

CALIFORNIA COASTAL COMMISSION

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CD-0006-20 (National Park Service)
April 22, 2021

CORRESPONDENCE
(received as of March 26, 2021)

Individual Members of the Public
Part II

December 7, 2020

To: California Coastal Commission

RE: The Consistency Determination for the National Park Service Point Reyes National Seashore 2020 General Management Plan Amendments

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 will be discussed during your meetings in January.

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:

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. New development in highly scenic areas such as those designated in the California Coastline Preservation and Recreation Plan prepared by the Department of Parks and Recreation and by local government shall be subordinate to the character of its setting.

After living abroad for 15 years, we were excited to return to the Bay area and all that it has to offer. One of our favorite activities is to spend a day at Point Reyes National Seashore to enjoy the beautiful natural habitat and wildlife. We have made numerous visits to the park over the past two years, and find portions of the visit to be disappointing and disturbing. We visit a national park to be immersed in nature, but often find ourselves driving through what appears to be a barren wasteland. This is the case for most of the drive along Pierce Point Road on the way to the Tomales Point Elk Reserve. The view consists of Confined Animal Feeding Operations, trodden and barren dirt and/or weeds, areas filled with manure, miles of barbed wire fencing, and farm related buildings in various states of repair. This is not the view we expect to see in a National Park. In fact, we find the experience to be depressing and an example of extremely poor stewardship of the land. Although we haven't visited the entire park, we wonder if it is even possible to enjoy any of the coastal areas without being confronted with the stark views caused by the dairy and beef operations located within the park.

By law, the NPS is mandated to manage all national parks in a manner which provides maximum protection, restoration and preservation of the natural environment for generations to come. This is certainly not taking place on the land that one must view on the drive to Tomales Bay. Please see photos below:



Stark Views Along Pierce Point Road - Sep, 2020



Stark Views Along Pierce Point Road - And Strong Manure
Odor - Sep, 2020



Stark Views Along Pierce Point Road - Sep, 2020



Stark Views Along Pierce Point Road - Sep, 2020



Stark Views Along Pierce Point Road - Nov, 2020

In January of this year, we had the good fortune to attend a PRNS field trip led by Laura Cunningham, California Director of Western Watersheds Project. We learned that the barren and degraded landscapes that we view within PRNS are due to the grazing of cows. The barren and/or weed covered land that we view within the park should be covered in native coastal prairie, valley grassland, and coastal scrub. Ms. Cunningham also discussed the rare and biodiverse coastal prairie ecosystem. This native habitat contributes to the wellbeing of native animals and protects the soil from erosion. We also learned that the cattle areas are not only absent of native grasses, but the vast amounts of manure produced by the cows pollutes the streams, beaches and ocean. We should be protecting natural habitat within a National Park for the enjoyment of visitors and also preserve the natural environment. Below are photos taken during the field trip:



Non-Native Weeds In The Areas Containing Cows



An Unsightly Confined Animal Feeding Area



View Across to Large Cattle Operation Showing Non-Native Plants



A Small Area Of Undisturbed Native Plants



Native Grasses and Shrubs

Point Reyes National Seashore is the only national Seashore on the West Coast of the United States. It is a natural treasure that should be maintained as a haven for wildlife and wild habitat. The public should be able to visit this National Park to be immersed in nature without having to be confronted by scenes of destruction caused by agricultural operations.



What We Expect To See in PRNS



What We Expect To See in PRNS

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.

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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.¹

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:

¹ 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.² 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)
...

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

² 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).³ **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,⁴ which was renewed in 2015 and expires in 2020. A General Waste Discharge Requirements Waiver was

³ 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.

⁴ 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 . . .

The San Francisco RWQCB listed Tomales Bay, and major Tomales Bay tributaries, including Lagunitas Creek and Olema Creek,⁵ 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.

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 . . .

⁵ 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).⁶

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

⁶ 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).

Drakes Bay and Drakes Estero⁷ 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,⁸ 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.

⁷ Steelhead, a threatened species, use Drakes Estero. They have been observed in at 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.

⁸ 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 (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 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,⁹ 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.)

⁹ 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.¹⁰ 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).

¹⁰ 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).

PORE:¹¹ 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

¹¹ 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.¹² 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).

¹² “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 (N₂O)**, a product of **denitrification**, is a major **greenhouse gas**; **high nitrate estuaries** may be an important source of **N₂O** 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 (NH₄⁺)**. A small fraction occurs in the **un-ionized form (NH₃)**, 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 (NH₃)** 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 **NO₂**) 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 NO₃-)** 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 NO₃-)**.

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** (NH₄⁺) fairly consistently (N=390) and as **un-ionized ammonia** (NH₃) 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** (NH₄) 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

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 6.¹³

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:

¹³ 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.¹⁴ 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.

¹⁴https://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.¹⁵ 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

¹⁵ 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),¹⁶ Five Brooks (OLM14) and Lower Olema Creek (OLM10B), B Ranch (DBY2) and Creamery Creek (DES1)¹⁷ 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.

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

¹⁷ 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,¹⁸ 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

¹⁸ 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,¹⁹ 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

¹⁹ 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, 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

December 7, 2020

To: California Coastal Commission

RE: The Consistency Determination for the National Park Service Point Reyes National Seashore 2020 General Management Plan Amendments

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 will be discussed during your meetings in January.

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:

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. New development in highly scenic areas such as those designated in the California Coastline Preservation and Recreation Plan prepared by the Department of Parks and Recreation and by local government shall be subordinate to the character of its setting.

After living abroad for 15 years, we were excited to return to the Bay area and all that it has to offer. One of our favorite activities is to spend a day at Point Reyes National Seashore to enjoy the beautiful natural habitat and wildlife. We have made numerous visits to the park over the past two years, and find portions of the visit to be disappointing and disturbing. We visit a national park to be immersed in nature, but often find ourselves driving through what appears to be a barren wasteland. This is the case for most of the drive along Pierce Point Road on the way to the Tomales Point Elk Reserve. The view consists of Confined Animal Feeding Operations, trodden and barren dirt and/or weeds, areas filled with manure, miles of barbed wire fencing, and farm related buildings in various states of repair. This is not the view we expect to see in a National Park. In fact, we find the experience to be depressing and an example of extremely poor stewardship of the land. Although we haven't visited the entire park, we wonder if it is even possible to enjoy any of the coastal areas without being confronted with the stark views caused by the dairy and beef operations located within the park.

By law, the NPS is mandated to manage all national parks in a manner which provides maximum protection, restoration and preservation of the natural environment for generations to come. This is certainly not taking place on the land that one must view on the drive to Tomales Bay. Please see photos below:



Stark Views Along Pierce Point Road - Sep, 2020



Stark Views Along Pierce Point Road - And Strong Manure
Odor - Sep, 2020



Stark Views Along Pierce Point Road - Sep, 2020



Stark Views Along Pierce Point Road - Sep, 2020



Stark Views Along Pierce Point Road - Nov, 2020

In January of this year, we had the good fortune to attend a PRNS field trip led by Laura Cunningham, California Director of Western Watersheds Project. We learned that the barren and degraded landscapes that we view within PRNS are due to the grazing of cows. The barren and/or weed covered land that we view within the park should be covered in native coastal prairie, valley grassland, and coastal scrub. Ms. Cunningham also discussed the rare and biodiverse coastal prairie ecosystem. This native habitat contributes to the wellbeing of native animals and protects the soil from erosion. We also learned that the cattle areas are not only absent of native grasses, but the vast amounts of manure produced by the cows pollutes the streams, beaches and ocean. We should be protecting natural habitat within a National Park for the enjoyment of visitors and also preserve the natural environment. Below are photos taken during the field trip:



Non-Native Weeds In The Areas Containing Cows



An Unsightly Confined Animal Feeding Area



View Across to Large Cattle Operation Showing Non-Native Plants



A Small Area Of Undisturbed Native Plants



Native Grasses and Shrubs

Point Reyes National Seashore is the only national Seashore on the West Coast of the United States. It is a natural treasure that should be maintained as a haven for wildlife and wild habitat. The public should be able to visit this National Park to be immersed in nature without having to be confronted by scenes of destruction caused by agricultural operations.



What We Expect To See in PRNS



What We Expect To See in PRNS

To: The 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)

These comments are being submitted in reference to the upcoming Federal Consistency Determination request for the National Park Service at Pt. Reyes National Seashore (PRNS). I urge the Commissioners to reject this submission on the grounds that the Point Reyes National Seashore General Plan amendment is inconsistent with the California Coastal Act.

My experience stems from recent studies of the ecology, wildlife, history and legislative background of the creation and management of this park, as well as first-hand visits. In an attempt to better educate myself, I organized a series of webinars featuring scientists, biologists, legal experts, conservation advocates and other experts to share their specific knowledge on PRNS with the general public. During these webinars I joined hundreds of viewers in learning about the degradation of native vegetation, damage caused by invasive non-native plants, soil depletion and erosion, air and water pollution, restrictions to public access, ruined scenery and landscapes and the climate pollution occurring from large-scale ranching activities at PRNS. Presently, I am one of the many advocates for the protection and restoration of PRNS. This appeal to the CCC is critical in our plea for help in protecting this national treasure - - for the health and enjoyment of all people, for the survival of its threatened and endangered species, and for the future of our planet.

Point Reyes National Seashore is the ONLY national Seashore on the West coast of the United States. For this reason alone; it deserves to be protected, treasured and respected. This park was not created as rangeland...these ranches were not purchased so that lessees could pollute and destroy this land. And yet, they've been permitted to do so. This is an outright assault on Public Access, Public Rights and Public Safety. (California Coastal Act Section 30210). The pollution and devastation that these agricultural industries have caused to our public land and waters is an assault on our public health and damages environmentally sensitive habitat.

Below are just a few of the numerous failures of the proposed NPS Plan in meeting the articles of the California Coastal Act:

Policies – Article 4 addresses concern for the quality of coastal waters for the protection of human health, stating “... *it shall be maintained and where feasible restored through minimizing adverse effects of wastewater discharges, controlling runoff, etc.*” It is further stated that “*Coastal areas where water-oriented recreation activities can occur must be protected.*” (**Recreation: CCA Section 30220**)

The Point Reyes National Seashore General Plan amendment is inconsistent with the California Coastal Act because it continues to allow waste from cattle ranches to be dispersed through the watershed and into the sea, polluting the area.

In 2013, NPS scientists published these findings in the “Coastal Watershed Assessment for GGRNA and PRNS,” revealing that the conditions in the park dramatically exceed the articles of concern:

“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.” (NPS 2013)

Ranching activities produce over 133,000,000 lbs. of manure per year affecting erosion, runoff and the spread of e. Coli bacteria into streams, waterways and beaches. This is more than “*an impediment to water-oriented recreation activities*” that the Coastal Act is designed to protect...it is a direct threat to marine species and human health. (**Marine Environment, Section 30230**)

Sec. 30240(a) “Environmentally sensitive habitat areas shall be protected...”

But in fact, they have not been protected. The NPS has failed repeatedly to comply with monitoring fecal coliform and sediment as directed by the Dept. of Fish & Wildlife in the PRNS livestock grazing program. Manure covers the beaches in several areas, including beaches designated for public use all along Tomales Bay.

The NPS Coastal Watershed Assessment for PRNS also found severe pollution occurred at the following dairy locations: North Kehoe Creek, J Ranch and K Ranch property line, L Ranch Impact Yard, A and B dairy ranches, and the McClure's dairy swale. Each of the aforementioned dairies measured conductivity (an indicator of dissolved solids) above 1700 $\mu\text{S}/\text{cm}$. This is double the lethal level for freshwater fish. Streams and tributaries leading to Drake's Estero (a federally protected wilderness), adjacent to a number of the dairies mentioned above (A Ranch, B Ranch, and C Ranch), all had a significant number of dissolved oxygen samples below the optimum range, posing a potential threat fish in these streams. (NPS Coastal Watershed Assessment for PRNS 2013)

It is further stated in the Coastal Watershed Assessment for GGNRA & PRNS:

"The effects of historic grazing practices are evident and pervasive, including gully erosion, soil compaction, nutrient enrichment, altered hydrology, increased vegetation cover of non-native pest plant species, and non-native pasture species that have naturalized from plantings and are now expanding into adjacent areas." (NPS 2013)

The NPS plan is inconsistent with the California Coastal Act **Article 2– Public Access, Section 30210, Access; recreational opportunities; posting. In carrying out the requirement of Section 4 of Article X of the California Constitution, maximum access, which shall be conspicuously posted, and recreational opportunities shall be provided for all the people ...** (emphasis added).

PRNS currently has 340 miles of cattle fencing. The preferred alternative/plan would increase fencing to 399 miles over the 20-year leases. As stated above, the California Coastal Act requires "maximum access" for "all the people" to the coast. This amount of barbed-wire and other cow fencing prevents public access to almost 30% of the park, which is owned by the American people. Locked gates prevent access to trails and park visitors have been confronted by rancher – lessees when accessing trails, who have insisted that the public is not allowed, contrary to the express right of public access.

Proposed expansion allowing the inclusion of row crops will further diminish public access and critically endangered wildlife coming into conflict with farming activities in the midst of what was previously designated as 'wilderness.' The expansion of ranching will also cause more crowding on already strained public trails, facilities, streets and parking lots.

With millions of visitors per year coming to our National Seashore our focus should be on how best to achieve a sustainable balance of nature and access for public health, recreation, and inspiration. Private commercial industry does nothing to contribute to any of these and therefore, it does not belong in this park.

The earth is undergoing an unprecedented species die off and animal agriculture is a major cause of species loss globally. One hundred plants and animals at Point Reyes are listed as rare, threatened and endangered. More than 90 percent of comments received on the NPS's draft plan for ranching at the seashore opposed the continuation of ranching.

Once again, I appeal to you as stewards of the California Coastal Act to stand firm in protecting this national treasure by rejecting the Consistency Determination of the Record of Decision by the NPS in regards to Point Reyes National Seashore, thereby protecting PRNS for the benefit of the public for generations to come.

Thank you for your consideration and your service.

Diane Elise Gentile & John Crowley
411 Broadway St.
Petaluma, CA 94952

From: Robert Johnston <rajohnston@ucdavis.edu>
Sent: Saturday, December 5, 2020 10:51 AM
To: Coastal Point Reyes Management Plan <PointReyesManagementPlan@coastal.ca.gov>
Cc: Weber, John@Coastal <john.weber@coastal.ca.gov>
Subject: Comments on the CD for the PRNS Mgmt Plan

Coastal Commission Staff,

Please place this memo into the Commission docket for the January meeting on the Pt. Reyes Nat'l Seashore Mgmt. Plan Consistency Determination.

Also, pls verify that it got put into the correct file and tell me how to see all of the comments on this upcoming Commission action.

Thanks,

Bob

Robert A. Johnston
415 663-8305 landline
530 559-0032 cell/text
P.O. Box 579, Point Reyes
Station, CA 94956

For the California Coastal Commission's January, 2021 Meeting:

**Comments Re. the Consistency Determination for the National Park Service
Point Reyes National Seashore 2020 General Management Plan Amendments**

Robert A. Johnston, Inverness, CA. December 5, 2020.

Summary

1. This is a Coastal Commission review of a Federal Consistency Determination (CD) required by the Federal statute at CZMA Sec. 306(d)(6) and regulations at 15 CFR 930.11(o).
2. The NPS submittal, the CD, reviews their Federal Agency Activity (NPS General Management Plan proposed amendment) and their Federal Agency Development (improvements to ranch

buildings and other structures). The NPS CD refers to the GMP Amendment, described as the Proposed Action in the EIS. The EIS describes its impacts.

3. The State Coastal Management Program in this case is the California Coastal Act, Chapter 3., Objectives. This Federal Activity and Development are to be rigorously reviewed against each of the Objectives in the Coastal Act for consistency. For the CD to be accepted, it must be consistent with all of the Objectives “to the maximum extent practicable.”

4. The NPS lands in this proposed GMP amendment are legally excluded from the California Coastal Zone, but the impacts from these activities will affect the downstream and nearby coastal zone resources and the public visitors driving there. So, a CD review is required.

5. The GMP amendment substantially increases the number and intensity of activities at the 24 ranches in the park by adding small livestock, crops, visitor B&B stays, retail sales of ag products, camping, and meat and cheese processing facilities.

6. According to the proposed GMP Amendment, the EIS, and other referenced park data, these activities will certainly continue or worsen the degradation of: coastal grasslands, wildlife habitats, illegal levels of water pollution in several creeks running to the ocean and to Tomales Bay, air pollution and greenhouse gases, and the quality of scenic resources sought by visitors. Therefore, this proposed Federal Activity is not “consistent to the maximum extent practicable” with several mandates of the California Coastal Act.

7. These comments follow my comments of August 8, 2020 before the NPS CD was submitted. Those comments evaluated the effects of the draft GMP amendments as described in the Draft EIR. Since then, the Preferred Alternative has authorized even more activities that are not consistent with the Coastal Act. So, my earlier comments are still accurate. I state my qualifications at the end of this memo.

8. I urge the Commission to object to this submittal, as is normally done in cases where there are “significant concerns.” (CCC, Federal Consistency in a Nutshell, rev. 1/2001).

The Proposed Federal Activity

The GMP amendments propose to allow the intensification of land uses on 18,500 acres in the Pt. Reyes National Seashore (PRNS) and on 10,000 acres in the Northern section of the Golden Gate National Recreation Area (GGNRA), managed by the PRNS. These 24 ranches are currently

under agricultural leases for beef cattle and dairy grazing. The NPS Proposed Action (the preferred alternative B. in the EIS) will allow:

1. Increasing the acres legally devoted to ranching in the parks by 7,600 acres.
2. A new commercial land use, Small Retail, for stores and stands for agricultural products.
3. A new industrial land use, Ag Processing, for small cheese factories, and slaughtering livestock.
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 and up to 500 chickens per ranch).
10. The existing number of cattle will be allowed (5,500 head).
11. Elk will be shot, so as to be “compatible with authorized ranching operations.”

Comments

1. Soil Erosion, Water Quality, and Vegetation

Cal. Pub. Res. Code, Sec. 30243. “The long-term productivity of soils... shall be protected...”

Most of the dairies are so crowded near to the barns and feeding areas that the soils are impervious and biologically dead from trampling. The Nitrogen from spraying manure water on pastures also kills most organisms. Compared to the original coastal grasslands, these lands are clearly severely degraded. Pollutants run down to the coastal zone. The bare soils can be observed from satellite scenes on any map viewer such as Google Maps and from Street View in that software. Soil erosion in the dairy and beef ranch fields can be seen by “windshield survey,” supported by an examination of the Erosion Hazard map in the EIS, Appendix A, Figure 42. A large part of the ranch lands near Lagunitas Creek are rated Very Severe for erosion hazard and a large part of the other ranches are rated Severe and Very Severe. Most of these lands in the former area are also rated as Low Resistance to Soil Compaction, as are ranch lands in the N. half of the area on the peninsula. Local environmentalists and range specialists have

documented the severe soil compaction on many ranch fields. Dairies are especially prone to this problem, due to the concentration of the cows.

Sec. 30240. "Environmentally sensitive habitat areas shall be protected..."

The existing ranch practices in the PRNS have caused very poor range quality leading to widespread soil erosion, sedimentation, and manure pollution of nearby creeks. The PRNS' own ranch lands report shows a consistent lack of enforcement of their grazing rules, with too many cattle in many areas, year after year. A Summer or Fall drive through the ranch areas clearly shows hardened soil surfaces, gully erosion, creek eutrophication, and surface water pollution. Kehoe Creek is one of the most-polluted waterways in California. Children sometimes can be seen playing in its outlet, a small pond in the sand at Kehoe Beach. Tomales Bay is an impaired water body for nutrients, pathogens, and sediment and several ranches contribute sediment, nutrients, and fecal pathogens to it. The aquaculture farms in the Bay have to stop harvesting for a week or two after Winter rainstorms, due to the health hazards caused by the shellfish uptaking pathogens brought in with this runoff.

All of the ranches are prohibited from discharging any water pollutants to any surface or groundwaters by their Conditional Waivers imposed by the regional Water Board. Any observer, though, can see brown runoff after rainstorms flowing from the fields of the dairies and the beef ranches into swales and small creeks and thence into creeks that run to Tomales Bay, the Ocean, or Drakes Estero. See the Hydrology map in the EIS, App. A, Figure 44, for the locations of streams, which occur throughout the ranch lands.

Most dairy waste from barns and yards is scraped into settling ponds and the liquid part is sprayed onto fields in the dry season. So, that part of the manure discharges partly infiltrates to subsurface soils and groundwater. However, some of these sprayed fecal deposits and the manure piles ("cow pies") from milk cow pastures simply run off into surface waters. Most of the dairy cows are kept about a hundred yards away from Lagunitas Creek and Olema Creek, which run to Tomales Bay, and from Drakes Estero. But, all of the dairy fields drain into the Bay or Ocean.

The Proposed Action alternative will fence off some areas near to the Ocean, Drakes Estero, and Tomales Bay, but the remaining fields all still drain into surface waters. One can see the

detailed drainage patterns from the EIS (App. A, Figures 9-32, the Ranch Zoning maps that are overlaid on shaded terrain basemaps). Also, Appendix A, Figure 41 shows slopes over 20% with the runoff patterns on the ranches. Last, please see Appendix A., Figure 46, Wetlands, to see how all of the ranches have several riparian corridors, most with narrow wetlands, cutting through their lands. The NPS water quality research reported in Appendix L. is primarily a methods paper but shows that the State single-sample water quality standard for fecal coliform was violated in 6% to 38% of the samples taken, for the years 2000-2013. Best Management Practices improved compliance over this period. Also, see Appendix N., pg. 64 for corroboration by the USFWS.

The park's rangelands have been severely degraded in past years, according to the Bartolome report done for the NPS, and the numbers of cattle apparently were not sufficiently reduced, likely due to inadequate inspections and inadequate enforcement of existing leases. As a result of such poor management oversight, many ranches violated the rangeland conditions (for minimum levels of vegetation density in the Fall) for several years at a time. Appendix E. in the EIS examines only a few recent years, but likewise shows considerable violations of the NPS residual vegetation standard. The overgrazed areas are spread throughout the planning area (EIS, App. E, Figures 4 and 5). Barely mentioned in the GMP amendment and EIS is the fact that the park has not been able to fund a range scientist for the past 45 years, except for about 2 years in that period. This shows the dearth of funding for national parks and also the priorities for staffing in this park. Overall this GMP amendment will require a budget increase of half a million dollars and a one-time allocation of about \$5 million, both dubious expectations in light of larger national fiscal issues. The management measures that "would be implemented" to reduce pollution from ranchlands (EIS, App. F.; NPS CD submittal, pg. 27;) are not guaranteed in terms of an NPS commitment to enforce them. That is, there exist no legally binding commitments by the park and lessees and no guaranteed funding for the park to manage the increased activities on the ranches.

In addition, they put off to the future the identification of many 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 NEPA cases and most agencies do not try this trick anymore. Throughout this CD, the NPS states that various mitigation actions are “assumed” or “anticipated” without showing the reader how they are guaranteed with contract provisions in the leases and how the staffing required for the additional oversight required will be funded in the future. The NPS does not actually commit to most of these mitigation actions (called management actions here).

The Proposed Action has the largest adverse impacts of all alternatives in most categories, while Alternative F, no ranches, has the smallest adverse impacts and many positive impacts on the environment and on park visitors. Alternative F, which would terminate the ranch leases, would attempt to restore the coastal grasslands in these areas.

2. Coastal Visitor Quality of Experience

Sec. 30251. “ The scenic and visual qualities of coastal areas shall be considered and protected as a resource of public importance.”

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 NPS, Marin County Supervisors, and Marin County Farm Bureau maintain that the public wants a “balance” of natural landscapes and ranches. This is an outdated idea, derived from the early decades of Marin County, when ranching was economically important and from the second half of the 20th Century when ranches were found to be essential for the protection of open space. In a national park, of course, we don’t need ranches to stop subdivisions. Ranches are now a very small part of Marin County’s economy. (Total Gross Domestic Product for the County in 2018 was \$24B (BEA), while ag product in 2018 was \$94M (Marin Co.), or 0.4%.) The best measure of the public’s preference for elk and coastal prairie landscapes over ranches is the fact that only 2% of 7,600 comments on the DEIS supported the Preferred Alternative, B, keep the ranches. Of all comments that endorsed an alternative, 94% preferred Alternative F., no ranching. This is a phenomenally strong set of public opinions regarding alternatives in an EIS, opposing the Preferred Alternative.

The Marin County Local Coastal Program supports ranching and could be considered by the Coastal Commission in this CD review. The LCP, however, covers all of the Marin coastal zone

and the great majority of ranches in the coastal zone are outside of the park and have different environmental and economic circumstances. Within the park, the Coastal Act objectives should control the CD process where we can expect higher standards of environmental protection. With regards to the Coastal Act objective to protect agriculture, I note that Sec. 30007.5 requires that conflicts among objectives “be resolved in a manner which on balance is most protective of significant coastal resources.” So, the promotion of agriculture must be secondary to the protection of soils, habitats, wildlife, and scenic views. Also, none of the ranches contain prime agricultural soils.

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). From this discussion, it seems safe to say that the Proposed Activity will damage the scenic qualities viewed from the coastal zone in the park.

3. Air Pollution and Greenhouse Gases

Sec. 30250(a). “New residential, commercial, or industrial development... shall be located within, contiguous with, or in close proximity to, existing developed areas...”

Ranching in the park generates 6.5 times the greenhouse gases that are produced by all visitors’ vehicles. Greenhouse gases from the ranches affect our climate globally and specifically cause sea level rise along this coastline.

The proposed activity 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 and meat processing plants, and various tourist accommodations. These tourist attractions will bring people out to these two parks who are not coming primarily 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 next to Pt. Reyes Station or Tomales, existing village activity areas.

California has been a worldwide leader in trying to reducing automobile travel to reduce greenhouse gases. Most recently, 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. Earlier laws urge compact urban growth and transit development. These laws show the importance of compact development to California's world-leading efforts to reduce climate change. The NPS plan amendments will increase sprawl in the parks and the EIS should have evaluated this impact.

4. Wildlife Protection and Enjoyment

30001 (c). "That to promote the public safety, health, and welfare, and to protect public and private property, wildlife, marine fisheries, and other ocean resources, and the natural environment, it is necessary to protect the ecological balance of the coastal zone and prevent its deterioration and destruction."

In terms of the larger purposes of the California Coastal Act, to protect coastal natural resources for the long-term enjoyment of the public, protecting the elk seems to be critical. They are a popular sight from several coastal parking areas and beaches, Limantour especially. And elk can be seen from most of the approach roads leading to the Lighthouse, the Pierce Point trail, and the northern beaches (Abbotts, Kehoe, McClures). This overriding issue is discussed only indirectly in the description of the impacts of Alternative F., no ranches. Not renewing the ranch leases would allow the elk to expand their territory throughout the peninsular part of the park. These native mammals have been here for hundreds of thousands, and possibly several millions, of years. They were numerous during the time of Native American settlement in this area, at least 15,000 years ago. They have great significance to the California coastal prairie landscape. Indeed, the coastal scrub plant community co-evolved along with the elk. Cattle are an introduced species, are very detrimental to many native plant species, and have only been in this landscape for less than 200 years. This GMP amendment will protect the cattle, while keeping the elk populations under control with "lethal removal" so they do not eat more of the forage in the fields.

The S. half of the ranching area on the peninsula and the N. half of the ranching lands in the GGNRA are Red-Legged frog Critical Habitat. In spite of ranching lore about watering troughs

and in spite of the pass given to the NPS by the USFWS, most conservation biologists think that ranching harms this species.

This Federal Activity clearly impairs the park's habitats, which are protected by the Coastal Act. This Coastal Commission review also should acknowledge the standards described in the NPS submittal as their management objectives, which include "the preservation of native species" and "the management of invasive/non-native species." It should be clear to most observers that enlarging the area being ranched and extending the leases, originally intended in the mid-70s to go for 25 years or life tenancies, will worsen the environment for the native tule elk, increase the damage being done to these coastal prairie lands, and continuing to limit the enjoyment of the park's wildlife by the public.

5. Biased Evaluation of All Impacts

The EIS found several types of impacts to be significant, adverse, and unmitigated (air quality, water quality, vegetation, and wildlife). The EIS tries to portray these impacts, however, as "improvements" over the past conditions by using the "current conditions" as the baseline for impact analysis. That is, the NPS looked only at impacts at the margin, in terms of changes from the present state. This allows them to ignore the fact that many of the impacts are significant and adverse in absolute terms in their present state, which is what is experienced on the ground and what matters in terms of being consistent with the Coastal Act. The NPS should have evaluated the impacts absolutely. Standard practice under NEPA and CEQA is to use the original natural conditions as the Baseline whenever restoration to that original state is being evaluated as an alternative. Also, cumulative impacts are generally evaluated back to the natural conditions for the site. I will not comment on many other types of impacts, as experts will do that better than I can. Also, for the Commission to find the CD inadequate and to refuse acceptance, it only has to find one impact of the Federal Activity that is not consistent with the Coastal Act.

The NPS also asks the Commission to not evaluate the "programmatic actions" and their impacts as described in the EIS (CD, pg. 7). Programmatic actions are often only described in general terms, but that is usually sufficient to assess their impacts, at least qualitatively. All activities should be evaluated by the Commission staff and Commissioners in this review.

6. Summary

This Federal Activity 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 Proposed Action (“Activity” for CD purposes), Alternative B., caused the largest adverse impacts, compared to the No Action and all other alternatives. The Final EIS is not significantly different, but this comparison was dropped.

7. My Qualifications

Since this is a significant issue with major effects on California’s coastal environment, 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 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 and regional 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 early 80s. I have reviewed the LCP for Marin County in detail, read the PRNS GMP, and the current subject documents (the GMP amendments and related EIS, with many supporting documents).

Robert A. Johnston

rajohnston@ucdavis.edu

415 663-8305

National Park Service's General Management Plan Amendment - Point Reyes National Seashore

Gayle Cerri <gcerri847@gmail.com>

Sun 12/6/2020 5:45 PM

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

Dear Coastal Commission:

I urge the Commissioners to reject the National Park Service's (NPS') submittal because it misrepresents the consistency of the General Management Plan (GMP) with the California Coastal Act with respect to Chapter 3 Article 2, Article 3, Article 4, and Article 5.

The NPS lands in this proposed GMP amendment are legally excluded from the California Coastal Zone, but the impacts from these activities will affect the downstream and nearby coastal zone resources and the public visitors driving there. So, a CD review is required.

As you read this I ask that you remind yourself we are discussing a National Park. The Point Reyes National Seashore was established to protect the wildlife, land, and seashore. Our government paid millions of dollars to the ranchers so they would vacate the land at specified point in time, thus allowing all the people to enjoy the beauty and grandeur of nature at its very best.

Public Access

California Coastal Act - SECTION 30210

Development should not interfere with public access. Access should be provided for "all the people"

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 be provided for "all the people" (Section 30210).

The General Management Plan preferred alternative B provides access and opportunity to the ranching families that the public does not receive. The ranches have access to land (28,100 acres), access to ocean views, access to exploit natural resources on the land, and access to profits acquired from the resources that the public does not.

There are 340 miles of fencing in the parks and some of it prevents people from accessing areas which the CCC has jurisdiction over (beaches and other lands within 1,000 feet of the high tide line). The NPS' Final Environmental Impact Statement (FEIS) states another 59 miles of fencing is planned in unknown places.

There have been reported incidents of hikers being harassed by ranchers for being on ranch pastures which is contradictory to the law because they have the legal right to be there.

Protect natural resource areas from overuse

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.”

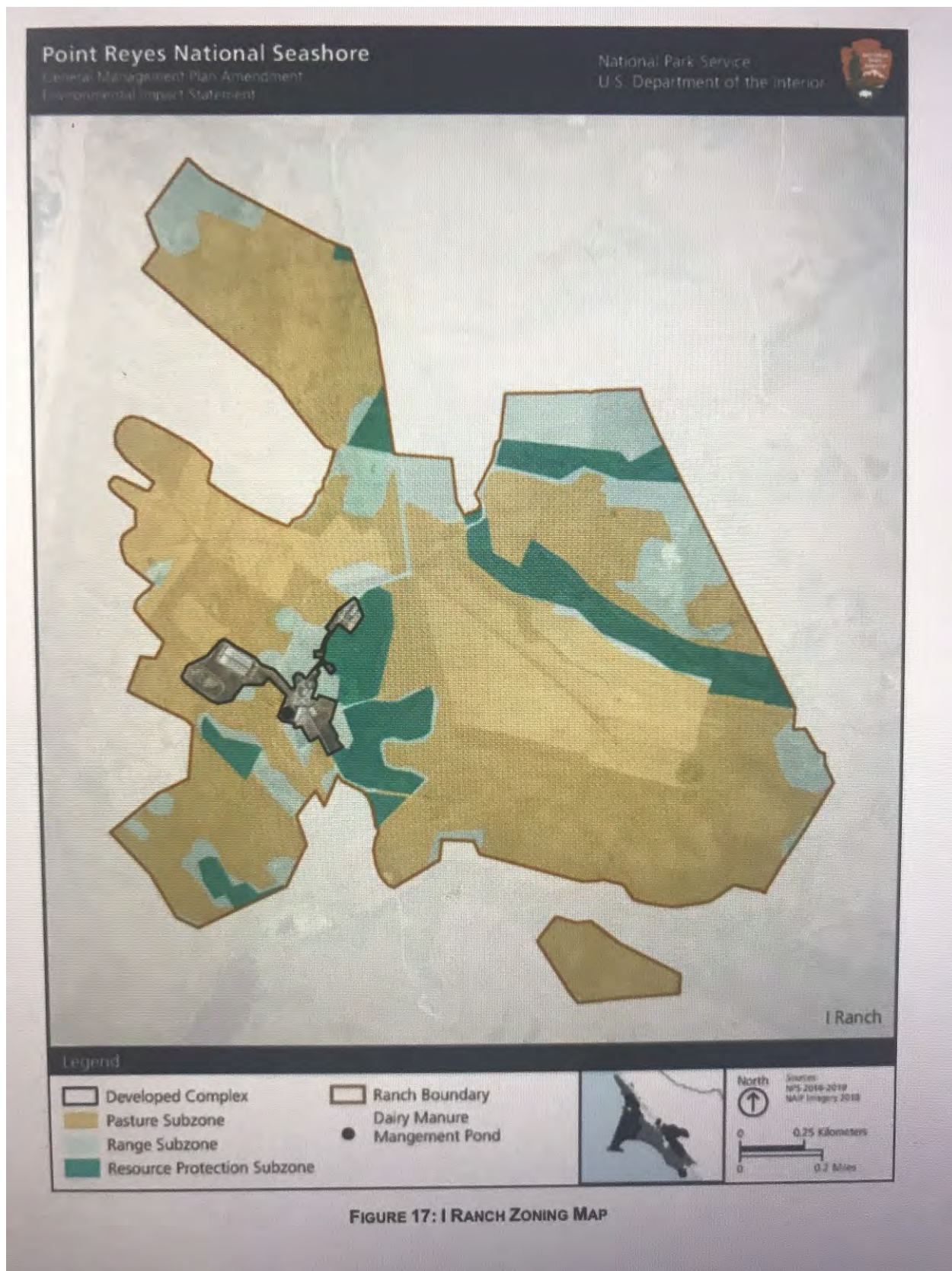
Article 4 Land Resources

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.

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From: Mark Bartolini <mark.bartolini1@gmail.com>
Sent: Friday, December 4, 2020 11:22 AM
To: Weber, John@Coastal <john.weber@coastal.ca.gov>
Subject: Submission for consideration re:Point Reyes National Seashore General Management Plan Amendment Consistency Determination

December 3, 2020

Mr. John Weber, Analyst
North Central Coast District
California Coastal Commission
Via email

Dear Mr. Weber,

I am writing to offer the California Coastal Commission input on The National Park Service's (NPS) General Management Plan Amendment for 18,000 acres of the Point Reyes National Seashore (PRNS) and 10,000 acres of the adjacent Golden Gate National Recreation Area (GGNRA). I am submitting a white paper I have been working on that I believe will be relevant to your review, in particular as it relates to CCS's mission on coastal access and environmental justice issues.

I apologize in advance for not having the time to synthesize my comments (I have, however, included both a table of contents and an executive summary.)

My professional background includes over 30 years of experience working with underserved communities around the world primarily in war zones and natural disasters. I have managed a wide range of humanitarian programs to assist the world's most vulnerable populations. These include medical and psychological trauma services, epidemic and pandemic response, disability programming, and economic development/livelihoods programs. For the past 7 years, I have focused my work on the nexus of climate change and disaster response. I am a native of Marin and began visiting PRNS with my mother as a three-year-old in 1962. I have lived (when not working overseas or in Washington, D.C.) in Inverness for 35 years. I am a past Executive Director of the Point Reyes National Seashore Association (PRNSA) and was a senior (appointed) official in the Obama Administration--Director, Office of U.S. Foreign Disaster Assistance in the United States Agency for International Development, (USAID).

I would be happy to follow up with the CCC on any aspects of my paper that might be of interest.

Sincerely yours,

Mark

Mark Bartolini

The Taking of Point Reyes:

A Case Study of White Privilege in a Time of Disaster

MARK BARTOLINI

About the Author:

Mark Bartolini has over 30 years of experience managing international relief programs in war zones and natural disasters. He has extensive experience working with underserved communities, and people with disabilities. He has managed large scale projects on community health, epidemics, pandemics, trauma, livelihoods and economic development. For the past seven years, he has focused on climate change and the challenge it poses to effective humanitarian response for the world's most vulnerable populations. Mark was a Vice-President at the International Rescue Committee, Director of the Office of U.S. Foreign Disaster Assistance in USAID and was appointed to the President's Advisory Committee on Voluntary Foreign Aid (ACVFA). He is a former Executive Director of the Point Reyes National Seashore Association.

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Executive Summary

The Trump administration is about to direct the National Park Service (NPS) to sign a "Record of Determination" allowing it to move forward with a controversial General Management Plan Amendment (GMPA) that will significantly expand both the timeframe and the extent of commercial ranching operations that already occur on over 28,000 acres of the Point Reyes National Seashore (PRNS) and Golden Gate Recreation Area (GGNRA).¹ The GMPA embodies two signature elements of the Trump era: it is an attack on diversity and it denies and ignores the reality of climate change.

This paper examines the history, policy considerations and politics behind this decision, while presenting an evidence-based rationale for removing the ranches, restoring PRNS and GGNRA lands currently being ranched, and recommitting the park to the vision of its early years: a wilderness oriented park that would have a special focus on people of color and underserved communities in the greater Bay Area. This paper submits that restoring PRNS will not only ensure the park's natural resources will be unimpaired, it will prove a forward looking disaster risk reduction and climate change mitigation strategy that by fostering a culture of health will produce far greater economic benefits while significantly improving the lives of millions in this and future generations.

At a time when Northern California is in the grip of two of the most severe disasters in its history, the coronavirus pandemic and unprecedented climate change-driven fires, a small group of well-connected and resourced ranchers have with the assistance of organizations dedicated to commercial use of public lands and deregulation lobbied the Trump Administration and two California members of Congress to greatly extend both the timeline and the scale of their commercial ranching operations in a National Seashore. While President Trump is the rancher's most powerful supporter, Senator Dianne Feinstein has been the most influential due to her persistence and her rank and position on the Senate Appropriations Subcommittee that funds Interior and NPS.

Staff of Senator Feinstein and Representative Huffman have met regularly with ranchers and their phalanx of lobbyists and experts. As their letters and comments demonstrate (as described and referenced in "The Taking of PRNS" section), they have adopted their requests often verbatim with the same deliberate inaccuracies and distortions of history meant to

¹ This includes 18,000 acres ranched in PRNS and 10,000 acres ranched in GGNRA—but on land administered by PRNS.

mislead the public with the intent of ranching becoming a permanent and expanded presence at PRNS.

The parents of the children now ranching these public lands sold their ranches at fair market value to the people of the United States with a binding agreement that (as with many other properties sold to create the park²) offered them the opportunity to live on the property (ROPs) until expiration at which time they and their operations were required to vacate. Many Californians would doubtless welcome the opportunity to revisit their parents real estate deals from half a century ago. But for millions of Californians who are getting short-changed in this deal--this is essentially a taking of their public lands.

The GMPA would provide ranchers with long-term multigenerational leases as well as allow a range of new activities that would have significant environmental impacts, would further reduce access for visitors and would further alter the pastoral zone in favor of commercial ranching. The GMPA would intensify the degradation of the more than 1/3 of the seashore currently being leased for ranching and, according to research described in this report, diminish the qualities of a national park or seashore that maximize health, and in particular mental health, benefits for visitors.

It will have the greatest impacts on underserved communities in the Bay Area who may lack the resources to visit other wilderness-oriented parks and will be denied the considerable health-related benefits that a restored PRNS could offer. The GMPA may also further alienate communities of color who may be offended by what ranchers are calling a "return to the Shafter era of ranching"--an era that coincided with the California Genocide (the state sponsored persecution and killing of 16,000 Indigenous Californians by white settlers). The fact that ranchers claim their 170-year history of European settlement on these lands is justification for their continuing commercial use of 28,000 acres when Indigenous Coast Miwok, with thousands of years of history, have been given just over an acre for Kule Loklo--a living history exhibit--is not a feature that is lost, or would be considered welcoming, in a state with the largest Indigenous American population and tribal representation in the United States.

² Ranchers object to the use of the word "park" to describe PRNS because they have attempted (inaccurately) to create a narrative whereby National Seashores are managed to a lower environmental standard than National Parks and must elevate the protection of cultural and historic values. 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). This paper will use Seashore, park and PRNS as all 3 designations are in common use and have no legal distinction relevant to the topics discussed in this paper.

Some may also feel that the mobile slaughter of animals, the sale of ranch products at farm stands on the ranches, and visitor lodging at the ranches--all new features in the GMPA--will further instill the ethos of a park that has assimilated the characteristics of one of the wealthiest, whitest counties in the country dedicated to high-priced food and luxury that attract primarily white visitors rather than fulfill its founder's vision which was a unique nature-oriented park accessible, *and welcoming*, to all.

The report demonstrates that even though Senator Feinstein, Representative Huffman and ranching supporters maintain that multigenerational diversified ranching is both ecologically and economically important to the region, there has been virtually no serious analysis to demonstrate that and there is overwhelming evidence to the contrary. The Final Environmental Impact Statement (FEIS) identifies numerous negative environmental impacts due to ranching with vague assurances some will improve.

There has been virtually no attention to the impacts of ranching on visitor access (other than a few references in the FEIS), health benefits and the overall economic value the park creates. According to analysis of the research cited in this report, ranching is a significant drain on the total annual economic impact of PRNS which is in the area of \$1.4 billion dollars annually. And it results in poorer health outcomes for visitors due to access restrictions and environmental impacts from ranching.

In the early 1970s as properties were acquired and the park became not only a legal reality but a functioning one, the NPS spent considerable time and money hiring consultants to reach out to communities of color and underserved communities because it recognized its need to overcome barriers created by its own troubled history including displacing Indigenous peoples to create national parks, segregating blacks during the Jim Crow era and disenfranchising underserved communities by creating a culture that reinforced both the color and class of its predominant visitors: the white middle class. This was reinforced by their remote locations, their entry and lodging fees, and their cultural exhibits which largely focused on white history.

Reaching out to these communities was a cultural shift in NPS thinking driven by the Civil Rights movement of the sixties and the indefatigable leadership on this issue by Interior Secretary Stuart Udall who from 1961-1969 set about making the nation's National Park's parks more accessible to all Americans by making them more welcoming and more diverse. He diversified

staff in an effort (still ongoing) to make the NPS look more like America.³ PRNS, which was only an hour from a major metropolitan area, was created in part to reach out to these communities and offer them an accessible first-rate national park experience. It's 1962 Enabling Act mandated: "(e) Fee or admission charge prohibited "

While the term "Environmental Justice" had not yet been coined, many progressives in the Bay Area understood that the cycle of poverty in which many of these communities found themselves was in part due to environmental impacts that impaired their health, their children's development , their prospects and their life expectancy.

With the establishment of the GGNRA in 1972, Point Reyes was reoriented to being the wilderness component of its much larger neighbor to the south. PRNS was going to offer these communities free of charge a first-class national park experience that would begin to address years of racial and social injustice foisted on their communities by dirty industries, commercial exploitation, institutionalized racism and social inequity.

But perhaps the historian John Hart was right, that it was just rhetoric, when he wrote:

the planners set out to draw the interest of people who would not ordinarily have been park-watchers--but for whom, in rhetoric at least, the park had been created. Chief among them were inner city people and their organizations--Blacks, Chinese, Japanese, Chicanos.⁴

It did not work out that way. John Sansing, PRNS's longest serving superintendant at 25 years, made common cause with the ranchers and encouraged them to seek new legislation that would allow 5-year leases after the finite terms to which they had agreed when they sold their properties, expired.

While this paper acknowledges the hard work and connection to the land of these families and their ancestors, this paper does challenge their coordinated campaign, replete with falsehoods, that attempts to secure a special privilege to allow them to degrade and diminish the benefits that would otherwise accrue to visitors on lands whose very purpose is to benefit *all* Americans in this and future generations.

³ Alan Lepore, "Secretary Stewart Udall - An Unsung Hero for Justice & Washington Football," SI.com, July 27, 2020, <https://www.si.com/nfl/washingtonfootball/news/secretary-stewart-udall-an-unsung-hero-for-justice-washington-football>.

⁴ John Hart, *San Francisco's Wilderness Next Door* (Presidio Press, 1979), 82.

It is a terrible irony that a park whose founders envisioned, because of its exceptional biodiversity, would become one of the crown jewels in the national park system while at the same time--due to its proximity to a major urban area-- be an opportunity to begin to address environmental and social discrimination against people of color and underserved communities should itself be degraded and restricted.

And it is a terrible indictment of our political system that as climate change driven fires burn four million acres in California's fifth consecutive year of unprecedented fire and smoke, as our kelp forests are dying, the coast is experiencing a dramatic loss of species and as the worst global pandemic in over a hundred years has already claimed 250,000 American lives--a small number of politicians have distorted the truth to advantage a handful of ranchers. In so doing, they have threatened the well being of millions of their constituents and the very premise of national parks as places that must be cared for unimpaired for future generations.

These properties were purchased with taxpayer dollars nearly sixty years ago and are still being heavily subsidized today. The public has expressed overwhelming opposition to continuing ranching;⁵ and there is an urgent need for the physical and mental health benefits national park's can deliver at a time of unprecedented crisis.

The report examines this last point through an evidence-based review of how national parks can improve both physical and mental health. The report describes how eliminating ranching would help foster a community of health integrated into the wider Bay Area health system which would more effectively address health disparity among underserved communities, people of color, children from underserved communities and people with disabilities.

The politicians who have turned Point Reyes into what it is today are suffering a failure of imagination. In fulfilling the rancher's dreams of returning the pastoral zone to the Shafter era of 150 years ago, they are reinstituting the very barriers that a community of health is meant to overcome: inequality, environmental degradation and a lack of diversity.

Such an approach ignores the reality around us and the invaluable opportunity we have to take steps now that will create far greater returns for all the people of the Bay Area by restoring PRNS. We are at the beginning phase of climate change driven events that will radically alter

⁵ 91% of the 7,627 respondents to the GMPA public scoping process were against ranching. Only 2.35% favored it. National polling shows the public, in the high 80s and low 90s percentile, consider preserving natural resources to be the most important management priority in our National Parks. The GMPA scoping analysis and the Hart National poll are linked in the bibliography.

life on this planet. California, for the foreseeable future, will be the epicenter of climate change in the United States. The mental health challenges we are currently facing with both unprecedented fires and Covid-19 are staggering. They will almost certainly grow even worse in the coming years.

President Trump was wrong, it's not getting colder. Once ranches are removed, it would take at least a decade to restore Point Reyes based on other such efforts. In 30 short years the impacts to the planet, and to the world's most vulnerable, will be almost unfathomable. The decision to restore Point Reyes, to work harder to make it a more welcoming and a more inspiring national seashore and to make it truly integrate into the region's community of health will, according to research cited in this report, pay dividends in the many billions of dollars for community health-- particularly mental health.⁶

Policy makers who fail to educate themselves on the research, to conduct a comprehensive economic analysis, to consult with scientists, with mental health professionals and with the communities that will be most impacted are doing a terrible disservice to their constituents and to the broader community. Our National Parks are not only places for enjoyment, inspiration and physical health--they are places for people to build mental health resilience and to find temporary refuge from the current and coming storm.

⁶ Cecily Maller et al., "Healthy Parks, Healthy People: The Health Benefits of Contact with Nature in a Park Context," in *The George Wright Forum*, vol. 26 (JSTOR, 2009).

I. Introduction

Since the founding of PRNS some 58 years ago, science has greatly advanced our knowledge of critical threats to, and the importance of, protecting biodiversity. It has also significantly deepened our knowledge of the benefits that we humans can derive from spending not just time--but quality time--in nature. The continued, and expanded, ranching operations promulgated in the GMPA are a display of raw power politics favoring special interests; they are an assault against America's Best Idea, our national parks. Some of the nonprofits that have helped ranchers carry their message to Washington are funded by the same donors that fund efforts to defund health care and appoint justices that promote deregulation and exploitation of our public lands. And officials in Marin County, asserting this is in the public interest, have used public funds to support the legal costs of private ranchers, leasing land that is not under their jurisdiction, to support these efforts and some of these organizations.

On one level, the issue of ranching in a national seashore is a small ripple among the rapids now roiling our lives. We are experiencing hundreds of thousands of Americans who've died of Covid-19, 1,200--3,000 Californians with preexisting conditions who've died of smoke-related causes due to unprecedented climate change-driven fires, and the death of George Floyd whose killing by law enforcement holding a knee on his neck for over 8 minutes has motivated a new, and reengaged an old, generation of activists committed to addressing the scourge of racial injustice. But on another level, as Norman Maclean wrote, "eventually all things merge into one." And in this decision drift some of the same societal ills and historical antecedents that have united millions of Americans in cries and concerns of "I can't Breathe!"

To nullify the public's right to seek legal redress Congressman Jared Huffman and Senator Dianne Feinstein worked together to craft a bill. H.R. 6687 that would have codified extending the operations of these ranches, prioritizing their extractive and destructive activities over wildlife, visitors, and one of the initial focus of the park: to serve people of color and underserved communities. The GMPA will limit and degrade public access and will reduce the considerable economic, physical and psychological benefits the park has to offer. It will make the park less welcoming to those who have been most marginalized in our communities and ensure that generations hence are denied the receipt of a park unimpaired. By ignoring the overwhelming public opposition expressed during the scoping process and national polls on how Americans want their parks to prioritize natural resource protection, a handful of politicians are diminishing our park, denying science and economics and the welfare of their own constituents in service of one small, but influential, special interest group.

This is taking place at an unprecedented time of global pandemic, climate change and racial injustice. It is an egregious assault on what Americans believe are the foundational principles governing our national parks, that they are meant for *all* Americans and that they are to be delivered to future generations unimpaired. The failure of comprehensive evidence-based analysis and inclusion in the decision-making process exposes the same institutionalized white privilege that sanctioned segregation in our national parks, the displacement of native and indigenous Americans, and an ethos of our parks as places for white, well-to-do, Americans. Rather than enriching the lives of all of us, it will only benefit a few and set the clock back to a time when rather than search for ways to make our society more equitable the power of government was used to perpetuate white privilege and profit at the considerable expense of the common good.

II. Conceiving and Creating the Point Reyes National Seashore, A brief History

The most authoritative accounting of the conception and creation of PRNS is Paul Sadin's, *Managing a Land in Motion*, an administrative history of the Point Reyes National Seashore commissioned by the NPS. Sadin describes in some detail the early framing of the seashore which was led by Conrad "Connie" Wirth (the NPS official whose depression--era study evaluated a national seashore on the Point Reyes peninsula). Wirth and his team saw the ranches as an impediment to visitors' enjoying the beauty of the peninsula:

The study narrative gave little attention to the ranches, noting only that the private holdings of the larger ranches "prevented the public from gaining any conception of the physical beauty of the region." NPS officials, the author [Wirth] acknowledged, might encounter "difficulties" trying to convince ranch owners to sell their property, but concluded that they would overcome any objection when the various parties paused to "think of the **great need of this breathing spot generations hence.** [*emphasis added*]"⁷

Of course, Wirth and his team were naive in their hope that the ranchers would ultimately see the future park as they did. But they were also eerily prescient, in their choice of words to describe their vision "the great need of this breathing spot generations hence."

They could not have foreseen a virus whose most feared symptom, the difficulty of breathing and being moved onto a ventilator, would kill hundreds of thousands of Americans and that the disparity in morbidity and mortality rates would highlight systemic inequities based on racial and social injustice; that smoke from unprecedented climate change-driven fires would kill thousands of Californians among the elderly and those with preexisting conditions; and that a man crying out to breathe would refocus the country on the continuing scourge of racial injustice and inequity.

They could not have known of the coming scientific and technological advances that would allow researchers to better understand how nature impacts health--even to identify precise neurological responses in the brain and how they respond to different natural settings. They did not know the existential threat a warming planet would pose to biodiversity, or the impact of

⁷ Paul Sadin, *Managing a Land in Motion: An Administrative History of Point Reyes National Seashore* (Historical Research Associates, Inc. 1904 Third Avenue, Suite 240 Seattle, Washington 98101, 2007), https://www.nps.gov/parkhistory/online_books/pore/admin.pdf.

methane from cows in promoting climate change. They would not have known of the importance of parks as places of refuge that promote health during a global pandemic where a virus is capable of airborne transmission; or the extraordinary economic and societal value of a pristine national park for promoting mental health.

However, in some ways the world in the late 50s and early 60s was not so different from today. Wirth and his team clearly articulated the importance of parks for the public's mental health. The Cold War was in full swing when Wirth and his team spoke out at hearings for creating the Point Reyes National Seashore in the late 1950s. Life on the planet was very much at stake and children were taught to "duck and cover" under their desks in case of attack. A "breathing space," "inspiration" and other such words and phrases were employed to describe what science is now explaining: that places of exceptional beauty and abundant wildlife, for many visitors, lift the human spirit and have benefits beyond simple enjoyment or recreation. When mankind through his own actions puts the survival of the human race and all life on earth at risk (as we have done through the development of nuclear weapons and through unchecked industrialization leading to a warming climate) these refuges of an earlier time can tie us back to our essential role in the universe and offer hope that their beauty, their abundance-- and our role in determining their future--will inspire and connect us to their, and our, salvation.

In 1957 the NPS Pacific Coast Seashore Survey, Point Reyes Peninsula, California, Seashore Area, also recognizes the unique characteristics:

The survey emphasized the significance and variety of the peninsula's unique combination of environments--forests, grasslands, dunes, freshwater marshes, and coastal estuaries--and of the abundance of wildlife found in each. The report concluded that the presence of these biological riches "most assuredly would justify every reasonable effort toward protection and preservation permanently as a public duty." This diversity of environments also added to the pleasing aesthetic qualities noted by the survey team. In fact the unusual combination of scenic, biological, and recreational resources in one coastal location, all in close proximity to an urban metropolis, created "significance" for the area that was greater than the simple sum of those parts.⁸

⁸ National Park Service, *Pacific Coast Seashore Survey*, (Point Reyes Peninsula, California , Seashore Area, , 1957).; Sadin, *Managing a Land in Motion*, 47.

The report planted the seeds for a vision embraced years later in 1972 when the NPS finally received the appropriations necessary to create in reality what for a decade had been a mismatch of properties and misguided recreational schemes promoted by park planners.⁹ The adjoining Golden Gate Recreation Area (GGNRA) was established. And PRNS was slated to become a wilderness-oriented seashore that would complement the adjoining more urban-oriented GGNRA whose northern reaches would fall under the administration of NPS staff at the Point Reyes National Seashore.

Ranch proponents claimed that because the 1962 Enabling Act promised ranchers the Government would not condemn their properties and allowed them to continue to ranch that this was proof that ranching was always meant to be a part of the park. There were ranch proponents at the time who were lobbying for such an outcome and some who may have believed it to be the case. There was also the NPS surveys that clearly omitted ranching in the park and a multitude of opponents including David Brower, the Director of the Sierra Club. The truth is in 1962, the ranchers did not want to sell and the park lacked the funds to purchase much of the land in the designated park area. The best play was to let ranching (and only ranching) continue as that would keep the land from being developed (and if a rancher tried to sell he would be in breach and the land could be condemned) while the Interior Department used its limited funds to purchase private land that might be developed.

A resolution to ranching would have to wait until they had more funds. In 1969 when the NPS was near selling off some of the property in the proposed seashore for development in order to acquire others, The Save Our Seashore movement was founded.¹⁰ Save our Seashore did just that, successfully lobbying for the funds to acquire the remaining properties.

The NPS came up with a proposal to ranchers to buy their properties at fair market value and then allow them to stay for their choice of 25-years or the remainder of the longer living spouse. It was a finite resolution of the issue of ranching in PRNS following the guidance issued in the early surveys. Ranching was to be eliminated. That was the USG's recorded legal resolution of the issue.¹¹ However, in the late 1970s, Superintendent Sansing, who favored a

⁹ Hill Gladwin, "Point Reyes in Trouble a Patchwork Park in Trouble," *The New York Times*, August 5, 1969, <https://www.nytimes.com/1969/08/05/archives/point-reyes-in-california-a-patchwork-park-in-trouble.html>.

¹⁰ Katy Miller Johnson, the widow of Rep. Clem Miller who fought so hard to create the park and then died just five weeks after the signing in a plane crash created the organization.

¹¹ Sadin *Managing a Land in Motion*, 177.

continuation of ranching, supported looking for ways to break that contract and the PRNS enabling legislation was amended to give the Secretary of Interior *limited* authority to issue leases for ranching. In the early 1990s, even before the ROPs which could not be renewed had expired, Sansing took it upon himself to begin negotiations with the ranchers about possibly extending 5-year leases with perfunctory consideration of compliance with the legal limitations that had been attached to the amended enabling legislation.¹²

While the founders in the late 50s and early 60s saw the importance of preserving the peninsula for future generations, and park planners in the 60s almost destroyed that vision with some of their grand plans, the 60s also brought arguably the most accomplished Secretary of the Interior in the nation's history: Stuart Udall. During his nine years as Secretary of the Interior, Secretary Udall would father not only seminal legislation protecting the environment such as The Wilderness Bill; The Wild and Scenic Rivers Act; and the Endangered Species Preservation Act he also brought a deep commitment to social and racial justice, equity and diversity. In fact, after leaving Interior in 1969 he went on to become a visiting Professor of Environmental Humanism at Yale.¹³ It was likely in no small part a product of his legacy that brought a renewed focus to the value of PRNS' s proximity to a major urban area that would make it 'greater than the sum of its parts.'

Udall had inherited an agency that just a decade earlier had sanctioned and enforced Jim Crow laws that mandated "separate but equal" facilities that barred blacks from accessing large areas of southern parks. And he knew that numerous national parks had come at the expense of indigenous communities driven from their native lands.¹⁴ This history had created cultural mindsets that national parks focused on white visitors and their history to the exclusion of all others. They were elitist, racist, dangerous, expensive and unwelcoming.

Udall understood when he became Secretary of the Interior in 1961 that to make national parks accessible to all Americans he would have to make them affordable and more welcoming. He also understood that with nearly all NPS staff being white as were the vast majority of visitors for many communities of color they were considered playgrounds for the entitled. He set about to diversify NPS staff and make it look more like the America whose birthright vested them with

¹² Ibid, 178.

¹³ Lepore, "Secretary Stewart Udall - An Unsung Hero for Justice & Washington Football."

¹⁴ Hanne Elisabeth Tidnam, "National Parks Are Beautiful—but the Way They Were Created Isn't," Medium, August 29, 2016, <https://timeline.com/national-parks-native-americans-56b0dad62c9d>; Kurt Repanshek, "National Parks," November 3, 2016, <https://www.nationalparkstraveler.org/2016/10/president-obamas-public-lands-legacy>.

title to the national parks.¹⁵ Udall understood that visiting our most iconic national parks, such as Yellowstone and Yosemite had become a rite of passage for millions of Americans families each year--but for millions more they were inaccessible places of white privilege whose cost of transportation, lodging, meals and entrance fees put them woefully out of reach.

PRNS offered a unique terrestrial and maritime wilderness smorgasbord, while at the same time being in close enough proximity that the park was accessible to some of the very populations that felt disenfranchised by the systems' more iconic parks.

Here was a peninsula whose geologic trajectory was separate from the rest of the country and the continent. It was slowly moving north every year while the country was moving south. It was home to an abundant array of wildlife and wilderness--both marine and terrestrial. Yet, it was in close proximity to an urban area of some 4.5 million (now almost 8 million) people for whom this was a relatively easy day trip. Visitors could even access the park by public transportation. On its inexorable journey north, the Point Reyes National Seashore would move the national park experience in the direction of equity. To leave no doubt that this was one of the central themes behind the creation of this park, the enabling legislation included this clause:

(e) Fee or admission charge prohibited Notwithstanding any other provision of law, no fee or admission charge may be levied for admission of the general public to the seashore.¹⁶

In the late 1960s and early 1970s the legacy of environmental humanism instilled by Secretary Udall met progressive thinkers in the San Francisco Bay Area. A focus on equity, underserved communities and people of color became clearly articulated within the goals of the new park. The NPS expended considerable resources to hire consultants and conduct extensive outreach to marginalized communities throughout the Bay Area.

The historian John Hart in his history of PRNS *San Francisco's Wilderness Next Door* describes the effort:

¹⁵ Lepore, "Secretary Stewart Udall - An Unsung Hero for Justice & Washington Football."

¹⁶ "An Act to Establish the Point Reyes National Seashore in the State of California, and for Other Purposes," Pub. L. No. S. 476 (87th) (1962).

planners set out to draw the interest of people who would not ordinarily have been park-watchers--but for whom, in rhetoric at least, the park had been created. Chief among them were inner city people and their organizations--Blacks, Chinese, Japanese, Chicanos.¹⁷

While the environmental justice movement would not be so-named until the 80s, and the vernacular used to discuss these issues has evolved, it was nonetheless a concept that many in the progressive San Francisco Bay Area were cognizant of in the early 60s. It is not coincidence that poorer communities are often co-located with heavy industry, that their air, water and services are degraded resulting in an array of negative impacts to their health, to their children's development, to their opportunities and to their life expectancy. These are elements in the circular vortex of extreme poverty and racial injustice is its eyewall.

Creating accessible (in the broadest sense of that term as will be defined in the section on health) national park's would not resolve these crushing forces affecting millions of Americans, but they are one step in the multitude that need to be taken to promote socio-economic equity for underserved communities as well as address racial inequities. Despite sincere efforts on the part of the NPS and a number of nonprofits whose mission is to reach out and introduce people of color to our parks, visitors to national parks remain predominantly white as do staff. It's a problem not just with the NPS, but throughout the environmental movement. Visitors to Yosemite National park are over 80% white and African Americans make up only about 1% even though they represent some 14% of California's total population. Armed law enforcement, a history of negative interactions, cultural histories that focus predominantly on whites, a feeling of being unwelcome --there are myriad issues that have created a cultural resistance in some communities to visiting national parks.

The vision of the founders of PRNS was to create a national seashore whose natural resources, including abundant marine and terrestrial wildlife, native plants and wilderness areas would rival some of the more iconic national parks and yet be more welcoming to constituencies that don't normally visit parks. The key to this was making Point Reyes both affordable and accessible. The founders clearly expressed their understanding that parks held special properties that had the potential to benefit the well-being of visitors and that these benefits should apply in a manner that was consistent with the underlying ideal of our national parks:

¹⁷ Hart, *San Francisco's Wilderness Next Door*.

that they are lands to which every American holds both title and trust to steward them without impairment for future generations.

III. Health and our National Parks

A significant amount of scientific evidence on the role that parks play in improving both mental and physical health has emerged over the 104 years since the NPS was founded. In recognition of this, the NPS has elevated the promotion of public health as a priority function.

Health (from the NPS website):

By promoting parks as a health resource, the National Park Service aims to bring about lasting change in American's lifestyle choices and their relationship with nature and the outdoors.

We have set in motion a 5-year Healthy Parks Healthy People Strategic Plan (2018-2023) complete with 10 guiding principles, 7 seven goals, and 1 vision—for parks to contribute to a healthy, just, and sustainable world.¹⁸ Although Healthy Parks Healthy People is based within the National Park Service, the program works with national, state, and local parks, as well as business innovators, healthcare leaders, scientists, foundations and advocacy organizations to advance the role that parks play in the health of our society. There are [more than 400 national parks](#) across the country with countless opportunities to find health, healing and happiness in a park near you.¹⁹

Promoting public health, as this paper describes, is a science-based natural fit for the national parks. It encourages visitation (access) and is clearly promoting a common good that (as studies

¹⁸ "Healthy Parks Healthy People (U.S. National Park Service)," National Park Service, September 18, 2019, <https://www.nps.gov/orgs/1078/index.htm>.

¹⁹ To read more about the considerable commitment the NPS has made to promoting health and why visit: <https://www.nps.gov/subjects/healthandsafety/healthy-parks-healthy-people-resources.htm>

cited in the economic section of this paper describe) has broader economic and societal implications which transcend the considerable benefits to the well being of the individual.

However, just as with the disparity in outcomes inherent in our health care system, race and poverty remain the primary factors underlying the inequities as to who actually receives the health benefits of visiting our national parks. The correlation relates to visitation numbers that show significant underrepresentation based on their proportional representation in society, particularly among African Americans, Indigenous Americans, Latinx Americans and underserved communities.

In the context of Point Reyes, there is another factor at work that impairs the potential of PRNS to improve public health: the presence and implications of ranching. The NPS's commitment to promote human health and to protect biodiversity are inexorably linked. The following sections will describe how ranching seriously degrades both, through limiting access, environmental degradation and making PRNS a less welcoming park. To a significant extent, this has the gravest implications for people of color and underserved communities--the very people--the historian John Hart wrote "for whom, in rhetoric at least, the park had been created" due to the impacts of disparity in our health system and society of which lower visitation numbers to national parks are just one factor.

There is abundant scientific evidence that demonstrates how spending time in nature improves one's mental and physical health. In healthcare terms, it's patient-funded therapy. Numerous initiatives such as the Global Healthy Parks/Healthy People movement supported by health organizations that include the Kaiser Family Foundation promote the considerable evidence-based health benefits that accrue to those who visit our national parks.²⁰

Studies have shown that people who visit parks are less likely to suffer from obesity, high blood pressure, high cholesterol, CPD, stress and a range of mental health conditions and have longer life expectancies. Moreover, they are more likely to experience a range of mental health benefits including better work productivity, relationships, social interactions, and less prone to depression.

A 30-minute visit to a park can improve heart health, circulation and lower cholesterol, blood glucose, and blood pressure. Walking in nature reduces inflammation and boosts your immune

²⁰ "Healthy Parks Healthy People (U.S. National Park Service)."

system, which decreases the risk of certain diseases and cancers. Interacting with a green space increases social interactions which can prevent diseases like dementia.

Listening to birdsongs and observing animals in nature have shown to promote well-being, reduce stress, improve mood, and reduce attention fatigue. Natural aromas from wood and plants have calming effects and viewing nature reduces mental fatigue.

These represent just a fraction of the health related-benefits researchers have ascribed to spending time in nature. Our National Parks can be a critical element in what the World Health Organization (WHO) calls "a culture of health" and PRNS, given its unique qualities, should be managed in a way that maximizes that potential benefit for all its visitors.

Health involves conditions relating not only to physiological and mental functions, but also to wider contextual factors, circumstances, and relations. This understanding forms the foundation for notions of a "culture of health" as a policy goal and ethical expression, providing a lens by which to assess COVID-19 effects. Referring broadly to "a set of social ideas and practices that promote healthy individuals, households, neighborhoods, communities, states, and nations," a culture of health depends particularly on notions of health equity.²¹ Health equity, which references fairness and social justice, "exists only when people have an equal opportunity to be healthy. Health inequity, therefore, is the unfair and avoidable difference in health status" seen within and across countries and societies, contradicting the realization of a culture of health.²²

Moreover, as a policy goal, a culture of health includes diversity as a core value, embodying inclusion and mutual respect. It is fundamental to health equity, "taking into account individual differences such as socioeconomic status, race, ethnicity, language, nationality, sex, gender identity, sexual orientation, religion,

²¹ Anita Chandra et al., "Building a National Culture of Health: Background, Action Framework, Measures, and next Steps," *Rand Health Quarterly* 6, no. 2 (2017).

²² Michael Marmot et al., "Closing the Gap in a Generation: Health Equity through Action on the Social Determinants of Health," *The Lancet* 372, no. 9650 (2008): 1661–69.; Connie L. McNeely, Laurie A. Schintler, and Bonnie Stabile, "Social Determinants and COVID-19 Disparities: Differential Pandemic Effects and Dynamics," *World Medical & Health Policy* 12, no. 3 (September 1, 2020): 206–17, <https://doi.org/10.1002/wmh3.370>.

geography, disability, and age.” Inclusion is a core element for successfully achieving and sustaining diversity.²³

The following four sections on race, underserved communities, children from underserved communities and people with disabilities will cursorily describe a few of the unique health-related inequities these groups face.

That will be followed by a section on barriers to access created by ranching and how removing those barriers could significantly increase the potential of the park to improve diversity, reduce inequity and promote public health through reimagining PRNS as park dedicated to a culture of health for all visitors and in particular residents of the greater Bay Area.

Racial and ethnic groups still tend to be segregated among the nine Bay Area counties, despite the fact that the overall demographics describe it as one of the most diverse areas of the country. The point in showing this data is to demonstrate that just saying the Bay Area is diverse does not imply equity, diversity or inclusion. And indeed within our counties diversity is limited. If, in building a community of health, inclusion is fundamental for a park to also be a locus for a community of health it too must be inclusive. Yet the segregation we see in our communities is not that different than the segregation we see in our national parks. And as discussed later in this paper, the GMPA will promote further segregation leading to more inequity in the health benefits derived by those who visit PRNS.

Racial and Social Justice

²³ “Human Rights and Health,” accessed November 21, 2020, <https://www.who.int/news-room/fact-sheets/detail/human-rights-and-health>.

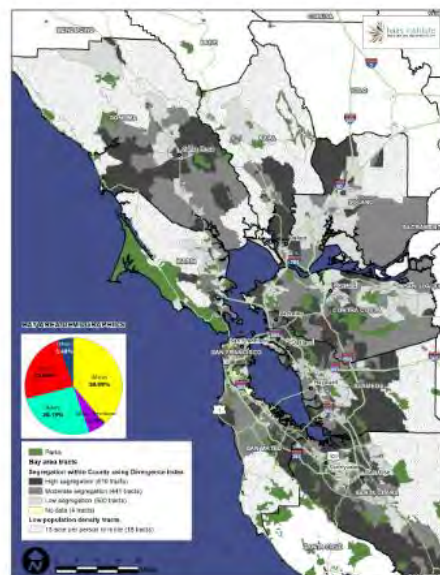


Figure 1: Map of the Bay Area²⁴

²⁴ “The Demographic Statistical Atlas of the United States - Statistical Atlas,” accessed November 23, 2020, <https://statisticalatlas.com/county/California/Marin-County/Race-and-Ethnicity>.

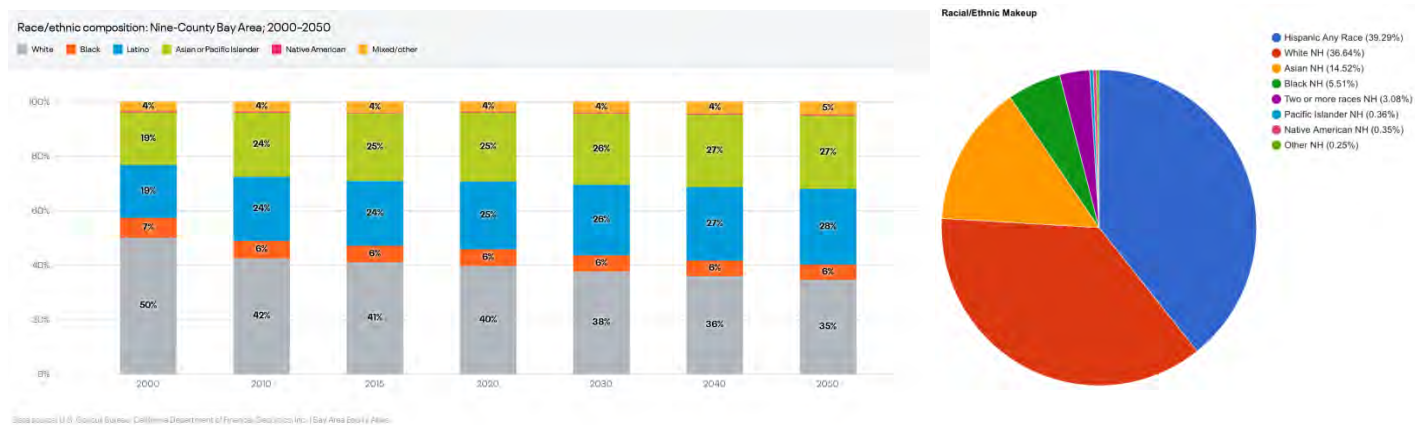


Figure 2 and 3: Race and Ethnic Composition of the Nine County Bay Area²⁵

The following link is to an interactive web site where readers can view race and ethnicity demographics and community location for the nine Bay Area counties:

<https://bayareaequityatlas.org/indicators/race-ethnicity#/>

Despite being significantly diverse as a region, every county shows significant racial and ethnic segregation.

Covid-19 has illuminated to a distressing degree the extent to which race plays a role in health outcomes. While I don't want to oversimplify or overstate the role parks can have in reducing health disparity related to Covid-19, it is striking how many of the comorbidities associated with complications from Covid-19 are the very ones that parks have been shown to mitigate and whose implications are being seen more in populations that visit parks the least.

Of course race and ethnicity account for myriad other risk markers for other underlying conditions that impact health. And the disparity in Covid-19 mortality rates suffered among African American, Indigenous American and Latinx Americans versus whites are certainly due to myriad interconnected factors in our society including socioeconomic status, access to health care, and increased

²⁵ PolicyLink/USC Equity Research Institute, "Bay Area Equity Atlas," 2019, <https://bayareaequityatlas.org>.

exposure to the virus due to occupation (e.g., frontline, essential, and critical infrastructure workers).²⁶

But embedded among these factors is the evidence-based reality that as a percentage of their respective demographic, whites who visit national parks at overwhelmingly higher numbers than Indigenous Americans, African Americans and Latinx Americans, live healthier lives and are less impacted. The correlation exists and relates not only to morbidity and mortality but also to the numerous mental health implications related to SARS CoV2.²⁷

Figure 3: COVID-19 Mortality Rate by Race/Ethnicity²⁸

Rate ratios compared to White, Non-Hispanic Persons	American Indian or Alaska Native, Non- Hispanic persons	Asian, Non- Hispanic persons	Black or African American, Non- Hispanic persons	Hispanic or Latino persons
Cases¹	2.8x higher	1.1x higher	2.6x higher	2.8x higher
Hospitalization²	5.3x higher	1.3x higher	4.7x higher	4.6x higher
Death³	1.4x higher	No Increase	2.1x higher	1.1x higher

²⁶ CDC, "Coronavirus Disease 2019 (COVID-19)," Centers for Disease Control and Prevention, February 11, 2020, <https://www.cdc.gov/coronavirus/2019-ncov/covid-data/investigations-discovery/hospitalization-death-by-race-ethnicity.html>.

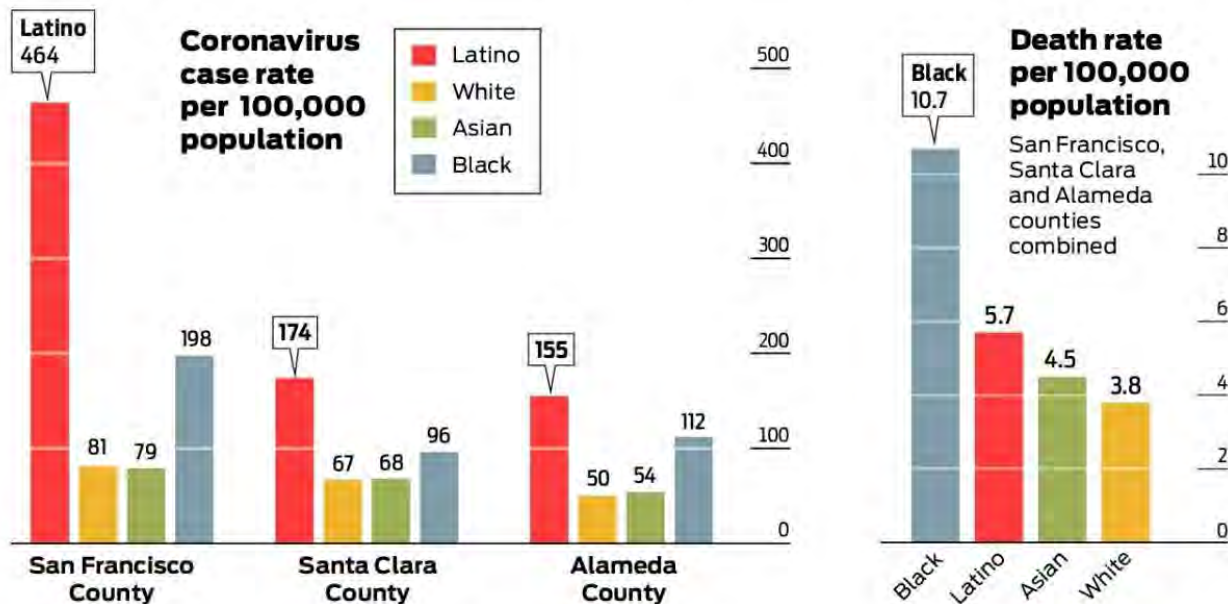
²⁷ [Shannon Firth](https://www.medpagetoday.com/infectiousdisease/covid19/89876), "Interplay of COVID-19, Substance Use and Mental Health— Minorities "doubly at risk" for long-term mental health consequences after surviving infection" MedPage Today November 24, 2020 <https://www.medpagetoday.com/infectiousdisease/covid19/89876>

²⁸ CDC, "Coronavirus Disease 2019 (COVID-19)," Centers for Disease Control and Prevention, February 11, 2020, <https://www.cdc.gov/coronavirus/2019-ncov/covid-data/investigations-discovery/hospitalization-death-by-race-ethnicity.html>.

Racial disparities in COVID-19

Latinos have disproportionately tested positive for COVID-19 in three of the Bay Area's largest counties, and black people have died from the disease at nearly twice the rate of any other race.

Data as of May 5



Note: The prevalence of testing in each county will likely influence case rates. Due to the relatively low number of deaths in each county, The Chronicle combined them for its analysis. In Santa Clara County, health officials grouped Asian and Pacific Islanders together.

Source: County public health departments; American Community Survey

Todd Trumbull / The Chronicle

This is the United States Environmental Protection Agency definition of Environmental Justice:

Environmental justice is the fair treatment and meaningful involvement of all people regardless of race, color, national origin, or income, with respect to the development, implementation, and enforcement of environmental laws, regulations, and policies. This goal will be achieved when everyone enjoys the same degree of protection from environmental and health hazards, and equal access to the decision-making process to have a healthy environment in which to live, learn, and work.³⁰

²⁹ Ibid.

³⁰ OP US EPA, "Environmental Justice," Collections and Lists, US EPA, November 3, 2014, <https://www.epa.gov/environmentaljustice>.

Poverty, as discussed earlier in this paper, is often described in terms of a trap: caused by self-reinforcing factors such as lack of capital, education and connections that once they exist persist until there is outside intervention. But one of the most insidious factors that the environmental justice movement has identified relates to health and the environmental conditions existing in many underserved communities that impair it. These preexisting conditions, which can cause both mental and physical impairment, can affect entire families and be a major factor in generational cycles of poverty.

The agendas of reducing such unfairly distributed environmental exposures (environmental justice) and the inequitable burden of poverty are converging, as reflected in recent suggestions to integrate efforts to make equitable environmental health policies with action on social, economic, and political disparities.³¹

Generational poverty is distinguished from situational poverty which is typically caused by an event or series of events in a person's lifetime. Drivers of situational poverty include recession, climate change, disasters, loss of a business, disease, health care costs and epidemics (or in the current situation, pandemics).

The United States, and in particular Northern California, is facing a historic time of situational poverty. Tens of thousands have lost jobs, businesses, apartments and homes and loved ones from Covid-19. The elderly are especially at risk and suffering from isolation. Thousands of people in each of the last five years have lost homes due to climate change-driven fires. Rising insurance rates threaten to drive many from their homes. The ACA may be overturned or diminished, food banks are under tremendous pressure to meet growing needs. Income inequality is rapidly increasing. Infrastructure is suffering and the state and cities are under tremendous economic pressure due to lost revenue related to the pandemic and federal mismanagement of SARS-CoV-2. Mental health problems, including suicide, depression, substance abuse and domestic violence are all on the rise. Certain groups such as teens and the elderly are being disproportionately impacted.³²

³¹ O'Neill, Marie S.[†]; McMichael, Anthony J.[‡]; Schwartz, Joel[§]; Wartenberg, Daniel[¶] Poverty, Environment, and Health: The Role of Environmental Epidemiology and Environmental Epidemiologists, *Epidemiology*: November 2007 - Volume 18 - Issue 6 - p 664-668

³² Kate Larsen, "San Francisco Experts Describe 'perfect Storm' of Teen Suicides, Youth Mental Health Crisis during Pandemic," ABC7 San Francisco, November 19, 2020, <https://abc7news.com/8079510/>.

Health Inequities, Underserved Children and National Parks

During my two-year tenure as the Executive Director of the Point Reyes National Seashore Association (PRNSA is a nonprofit established to support elements of the NPS' mission such as education) , our highest priority was introducing children from underserved communities to PRNS. PRNS's Clem Miller Environmental Education Center has produced numerous case studies of the transformative power of nature to shape, and even save, children from that cycle of poverty. Without doubt the most rewarding aspect of the job was knowing that in some cases PRNS was that intervention that liberated a child from a generational cycle of poverty.

There is considerable scientific evidence describing the nexus between childhood development and time spent in nature. And while all children can benefit from this effect, children who have suffered trauma and/or come from underserved communities often demonstrate the most compelling impact. Thousands of such children from underserved Bay Area school districts attend these programs in PRNS each year.

Research has established that having access to natural areas is vital to our overall well-being," said Yener Balan, MD, FAPA, "However, while everyone can benefit from being outside, residents in many low-income communities face significant barriers in accessing safe outdoor spaces, and often times, can have higher rates of chronic stress and obesity."

A good resource on the issue of nature and child development is *Last Child in the Woods: Saving our Children from Nature Deficit Disorder* by Richard Louv. There are innumerable articles and books on the topic and on the NPS website they cite these benefits:

Just 20 minutes in nature improves concentration and reduces the need for ADHD and ADD medications in children. Walking through nature also improves cognitive function and memory. These benefits can greatly improve performance in school.³³

Through the insight and dedication of PRNSA's excellent environmental education staff, over 60% of the several thousand children, that attend these programs each year did so on scholarships. New programs and partnerships were developed, such as one with the International Rescue Committee, that introduced newly arrived refugee children (and their families) to the benefits of visiting a national park.

³³ National Park Service, "Nature Makes You... (U.S. National Park Service)," May 17, 2019, <https://www.nps.gov/articles/naturesbenefits.htm>.

Many of the attending children lived in areas that were only a few miles from the ocean yet had never been to a beach. Many had childhoods defined by trauma such as child abuse, abandonment, parental drug abuse, spousal abuse, extreme poverty, violent neighborhoods, pollution and environmental degradation and health issues related to all of the above. Newly arrived refugee children often suffered war-associated trauma and were often bewildered by the transition to a new culture and often new language. But they were also full of hope driven by the desire to create a better world than the one they fled.

As PRNSA staff can attest, the experience for some of these children was transformative. For many, the joy and enlightenment that came from learning about and experiencing nature brought them back to Point Reyes year after year. Their grades, their social skills, their relationships and their mental health all improved. Some came back to work as counselors in the program and many went on to college and impressive careers. At PRNSA's annual dinner, some of these inspiring stories were highlighted by inviting former and current students to describe in their own words the role PRNS had played in their own extremely challenging lives.

While there are many undeniably positive aspects to these programs, it must be said that ranching degrades, rather than supports the role of children's environmental education in the PRNS. Part of the summer program at Clem Miller includes field trips to the pastoral zone of the park. Children are taken canoeing on Abbotts lagoon. The lagoon itself has shown contamination and the area surrounding is heavily ranched. These children, many coming from the most underserved communities in the Bay Area deserve better. Imagine the impact of being surrounded by free-roaming herds of Tule Elk and native fields of bunch grasses, and pristine waters rather than commercial mowers, manure spreading trucks, miles of fencing, cows and the smell of manure.

For many of these children, this is their one shot at being immersed in something approaching a Yosemite or Yellowstone experience. Many of their families don't have the resources to take them to another national park where the managers don't fence in herds of native elk into a small preserve, shoot or "aggressively haze" them, allow heavy equipment to plow barren fields and establish point of sale stands that sell boutique food they and their families cannot afford. The experience of cows, sheep, goats, chickens, guard dogs and all their smells and noise will perhaps become the lingering impressions these children will carry with them for years as their only visit to a National Seashore. Go to Abbotts Lagoon and really look. You are not in a National Seashore, you are in a commercial ranch. As described in this paper, there are a multitude of opportunities for experiencing ranching in the Bay Area and throughout the state. Is this the best we can do for these children?

Health Inequities, People with Disabilities and National Parks

People with disabilities bring their own unique perspectives on access when visiting PRNS.

Under the Americans with Disability Act, National Parks are required to make reasonable accommodations for people with disabilities to access the park. There is little that can be done in the mountainous wilderness area of the Seashore to accommodate certain disabilities related to mobility. Other than the loop trail at Bear Valley, and a specialized wheelchair with balloon tires that a very strong person might help get to a beach, the pastoral zone is the likely destination for people with mobility issues. The Abbotts lagoon trail (through the generous donation of a retired doctor) is partially wheelchair accessible as is the Light House overlook and the Chimney Rock Elephant seal overlook. But a visit to Abbott's lagoon is less an experience of visiting a national park and more the experience of a series of large commercial ranches with the sights, smells, pollution, erosion, lack of native wildlife, introduction of non-native farm animals, invasive weeds, fencing and heavy equipment.

A visitor with impaired vision will hear, smell and feel the park: in a park without ranching they may hear only the sounds of ocean surf, the songs of birds, the rustling of leaves in a tree, an elk bugling or other sounds of rutting, a bull elephant seal trumpeting, the sway of bunch grasses in an open meadow. They will smell the sea air, the trees, grasses, they will feel the wetness of salt air being blown across an open field the feel of different native grasses as they traverse a field. But for the majority of the pastoral zone all these sensations will likely be intermingled and degraded (or removed altogether) by the barriers created by 349 miles (soon to be 399 under the GMPA) miles of fencing, the sounds of non-native animals such as cows, chickens, goats and sheep. Depending on the time of year, they may walk barren or muddy fields devoid of native plants covered with cow dung. They will likely smell fields covered in liquid manure and may well hear the sounds of trucks and other large machines used to service and work the ranches. They will be denied access to a traditional national park experience and instead experience the same sensations offered alongside the roads of the many hundreds of ranches comprising much of Marin and Sonoma. But they have no other option than PRNS for a visit to a national seashore on the entire Pacific Coast.

IV. Environmental Justice and the GMPA

The environmental justice, social justice and civil rights movements share the same principles of seeking social justice, equal protection, and an end to institutional discrimination.

Environmental justice depends on the fair distribution of environmental benefits and burdens. One of the hallmarks of both environmental and racial discrimination is denying meaningful participation in environmental decision-making and failing to recognize community or cultural differences.

In the context of the GMPA, only one voice was sought and only one voice was heard--that of the ranchers. The voices of other communities were not heard nor was the situation they face in many of their communities understood. Access to green spaces in some communities in the Bay Area can be limited, dangerous and /or otherwise unhealthy. There was no discussion of the many factors that drive their "poverty trap" and how they and their children might benefit from a more pristine PRNS. It is a bitter irony that while science's understanding of how a national park might help or even be that transformational intervention has evolved, for many their situations have not changed. And -PRNS, already degraded , is on a path to become even less of a park under the GMPA.

In the intervening years, and in particular around the issue of ranching and how it might impact these most vulnerable communities, there has apparently been no outreach beyond the public scoping that took place as part of the NEPA analysis.

It's hard to see how that meets NEPA and 23 U.S.C. 109(h), requirements to consider impacts on all communities including low-income communities that must be routinely identified and addressed.

The entire process appears to have violated all three fundamental principles of Environmental Justice:

1. To avoid, minimize, or mitigate disproportionately high and adverse human health or environmental effects, including social and economic effects, on minority populations and low-income populations.
2. To ensure the full and fair participation by all potentially affected communities in the transportation decision-making process.

3. To prevent the denial of, reduction in, or significant delay in the receipt of benefits by minority populations and low-income populations.³⁴

This does seem consistent with the myriad attacks this Administration has made against diversity. While NPS might claim they met what was legally required of the process, it stands in stark contrast to the considerable proactive outreach to people of color and underserved communities that occurred during the early formative years of PRNS where the NPS spent considerable sums hiring consulting firms and ensuring these communities had a voice.

Of course at that time Stuart Udall was the Secretary of the Interior and I have already described his estimable record which speak far louder than his words.

In June of this year the NPS deputy director David Vela in a public statement on June 9 said:

The National Park Service commits to lead change and work against racism. Specifically, we will work together in building strategies and tools that effectively engage all communities so that we become better allies for inclusion, equity, and equality. We commit to doing a better job of listening and building a genuinely more inclusive environment both within the agency and with external communities.³⁵

That certainly was not the case with this process. Vela's statement reflects the concept of anti-racism, a system of proactive policies and behaviors meant to correct racial bias and injustice. It's an idea President Barack Obama advanced via presidential memorandum to NPS and other public land agencies in January of 2017. Called "Promoting Diversity and Inclusion in Our National Parks, National Forests, and Other Public Lands and Waters," this document encourages parks stewards to advocate for a more inclusive and complete story of America, advocates including diverse voices in the decision-making process for new public lands and

³⁴ "Environmental Justice," Virginia Department of Transportation, October 30, 2019, http://www.virginiadot.org/business/resources/Civil_Rights/Environmental_Justice_Questions_and_Answers.pdf.

³⁵ David Vela, "Statement from Deputy Director David Vela - Office of Communications (U.S. National Park Service)," National Park Service, June 9, 2020, <https://www.nps.gov/orgs/1207/06-09-20-david-vela-statement.htm>.

waters, and recommends increasing the number of outreach programs dedicated to providing better access for diverse communities.³⁶

These recommendations aim to correct more than a century of land management policies that have long ignored people of color. Anti-racism in our national parks means telling the stories of everyone who contributed to the historic character of the land. In doing so, not only can all visitors be made to feel welcome, they may even be inspired to help preserve and protect our lands.

“We try to get people to have meaningful experiences in our parks so that they will remain culturally relevant for a population that [is becoming] more ethnically diverse,” says Alan Spears, senior director of cultural resources at the National Parks Conservation Association. “We do that by rolling up our sleeves and creating new sites and exhibits that show the American people a history that they are a part of.”³⁷

While I don't doubt the sincerity of both Vela and Spears, the fact is they are working in an Administration that has openly and consistently waged war on diversity and inclusion.

The Trump administration issued an [executive order](#) and [memorandum](#) in September, prohibiting any discussion in the federal workforce of concepts such as systemic racism, white privilege and unconscious bias during workplace diversity training.³⁸

Not only was history not corrected in this process, but diversity and inclusion were dismissed. Rather than the benefits of our parks being protected and accessible to all in equal measure, the Trump Administration's rejection of diversity and inclusion has trickled down through all the agencies it directs.

The following is a transcript of a question on white privilege asked by the journalist Bob Woodward to President Trump and his response:

³⁶ Barack Obama, “Presidential Memorandum -- Promoting Diversity and Inclusion in Our National Parks, National Forests, and Other Public Lands and Waters,” whitehouse.gov, January 12, 2017, <https://obamawhitehouse.archives.gov/the-press-office/2017/01/12/presidential-memorandum-promoting-diversity-and-inclusion-our-national>.

³⁷ James Edward Mills, “How Can the National Park Services Work to Be Anti-Racist?,” National Geographic, June 23, 2020, <https://www.nationalgeographic.com/travel/national-parks/more-diversity-how-to-make-national-parks-anti-racist/>.

³⁸ Joanne Lu, “Why Diversity Training Has Been Suspended At USAID,” NPR.org, October 27, 2020, <https://www.npr.org/sections/goatsandsoda/2020/10/27/927838397/why-diversity-training-has-been-suspended-at-usaid>.

...And do you have any sense that that privilege has isolated and put you in a cave, to a certain extent, as it put me – and I think lots of White, privileged people – in a cave and that we have to work our way out of it to understand the anger and the pain, particularly, Black people feel in this country? Do you see?" Woodward asked.

"No," the president said. "You, you really drank the Kool-Aid, didn't you? Just listen to you, wow. No, I don't feel that at all." ³⁹

Interior Secretary Ryan Zinke

Three high-ranking Interior officials from three different divisions said that Zinke has made several comments with a similar theme, saying "diversity isn't important," or "I don't care about diversity," or "I don't really think that's important anymore." In a hallway meet-and-greet shortly after Zinke was confirmed, one staffer told CNN that Zinke was asked about diversity at Interior, a department with about 68,000 employees, of which more than 70 percent are white, according to the Office of Personnel Management. "(Zinke) flat out said, 'I don't really think that's important anymore. We don't need to focus on that anymore.'" ⁴⁰

Speaking of Peaceful Black Lives Matter Protests Interior's deputy assistant secretary of fish, wildlife and parks has written:

(T) he non-violent protesters actually are far more damaging to the long-term fabric of our civil society than the rioters," he wrote. ⁴¹

House Natural Resources Chair Raul Grijalva (D-Ariz.) called Carl "an avowed white nationalist" and argued his hiring does further damage to an agency that is among the least diverse in government. "Hiring Jeremy Carl, an avowed white nationalist, to run major portions of the

³⁹ "Trump Dismisses Question on White Privilege: 'You Really Drank the Kool-Aid,'" CBS News, September 10, 2020, <https://www.cbsnews.com/news/trump-bob-woodward-george-floyd-black-lives-matter-60-minutes-2020-09-10/>.

⁴⁰ Sara Ganim, "Ryan Zinke to Employees: Diversity Isn't Important - CNNPolitics," March 27, 2018, <https://edition.cnn.com/2018/03/26/politics/ryan-zinke-diversity/index.html>.

⁴¹ "US Interior Official Called Black Lives Matter 'Racist,' Defended Kenosha Shooter," Tasnim News Agency, October 31, 2020, [/en/news/2020/10/31/2379985/us-interior-official-called-black-lives-matter-racist-defended-kenosha-shooter](https://en/news/2020/10/31/2379985/us-interior-official-called-black-lives-matter-racist-defended-kenosha-shooter).

Interior Department is the culmination of a long and intentional process that started early in the Trump administration," Grijalva said in a statement to The Hill.⁴²

The Trump administration is scrubbing diversity in word and in deed, and all the attacks on diversity throughout the federal government threaten the security of the country. Officials at the Centers for Disease Control and Prevention received in December of last year from the administration a list of "words to avoid" to improve chances of getting funding, including "diversity," "evidence-based" and "transgender."⁴³ Secretary of Housing and Urban Development Ben Carson has recently proposed to amend the department's mission statement, removing references to "sustainable, inclusive communities."⁴⁴ Education Secretary Betsy DeVos Education Secretary Betsy DeVos scaled back civil rights investigations. The numbers of black, Hispanic and female White House staffers have dropped significantly since Trump took office.⁴⁵

Polling has shown that our national parks enjoy significant bipartisan support. But this report can't fairly describe the process that led us to the GMPA without exploring the various political currents, and back-eddies, (on both side of the aisle) that have taken us to where we are. Just as sure as President's Kennedy and Johnson guided Stuart Udall's direction of the NPS so too has Donald Trump's vision driven Ryan Zinke's and Dave Bernhard's direction of the NPS.

⁴² Ibid.

⁴³ Elizabeth Cohen, "The Truth about Those 7 Words 'banned' at the CDC - CNN," January 31, 2018, <https://edition.cnn.com/2018/01/11/health/cdc-word-ban-hhs-document/index.html>.

⁴⁴ P. R. Lockhart, "Ben Carson Is Pulling HUD Away from Its Key Mission," Vox, March 8, 2018, <https://www.vox.com/identities/2018/3/8/17093136/ben-carson-hud-discrimination-fair-housing-anniversary>.

⁴⁵ Andre Perry, "Ryan Zinke Just Doesn't Get It on Diversity (Opinion) - CNN," CNN, March 27, 2018, <https://edition.cnn.com/2018/03/27/opinions/zinke-has-it-wrong-on-diversity-perry-opinion/index.html>.; Rebecca Harrington. "Here's How Trump's Cabinet Compares to Obama's - Business Insider," May 11, 2017, <https://www.businessinsider.com/trump-cabinet-compared-to-obama-diversity-women-minorities-2017-5?r=US&IR=T>.

V. How Ranching degrades both the National Park experience and the special role our National Parks have in promoting physical and mental health

I remarked earlier that if ranching operations ceased and PRNS was restored to its founders' vision it would improve visitors' mental and physical health outcomes. Researchers at Stanford have determined that the degree to which health benefits, especially mental health benefits, accrue is correlated less to the time you spend in nature and more to the *quality* of the nature you experience. Greater biodiversity equals greater benefit.

Experiencing nature not only reduces stress but also improves our cognitive ability. Gregory Bratman from Stanford University and his colleagues enlisted 60 participants who were randomly divided into two groups: The first group took a 50-minute “nature” walk surrounded by trees and vegetation, and the second group took an “urban” walk along a high-traffic roadway. The nature walkers showed cognitive benefits including an increase in working memory performance, “decreased anxiety, rumination, and negative effect, and preservation of positive effect.”

In a subsequent study, Bratman investigated the neurological mechanisms affected by being in nature by measuring the part of the brain (subgenual prefrontal cortex) that is activated by brooding. Our tendency to brood, referred to by cognitive scientists as “morbid rumination,” often makes us focus on the negative aspects of our lives and can lead to anxiety and depression. Bratman and his colleagues found that the participants who walked in the quieter, wooded portion of the campus had lower activity in the brooding portion of their brains than those who walked near the busy roadway.⁴⁶

The psychological benefits of being in nature are also affected by the biodiversity of the natural environment. As cities design urban green spaces, incorporating diverse vegetation and wildlife improves urban dwellers’ health and well-being. A study in Sheffield, UK, surveyed the effects of different habitat types such as amenity planting, mown grassland, unmown grassland, scrub and woodland and

⁴⁶ Gregory N. Bratman et al., “Nature and Mental Health: An Ecosystem Service Perspective,” *Science Advances* 5, no. 7 (2019): eaax0903, https://advances.sciencemag.org/content/5/7/eaax0903?utm_source=miragenews&utm_medium=miragenews&utm_campaign=news.

monitored the butterfly and bird species in these areas. Participants showed an increase in psychological well-being in habitats with greater species diversity.

As researcher Richard Fuller and his colleagues point out, “The degree of psychological benefit was positively related to species richness of plants and to a lesser extent of birds, both taxa where perceived richness corresponded with sampled richness.”

Additionally, “Our results indicate that simply providing green space overlooks the fact that green spaces can vary dramatically in their contribution to human health and biodiversity provision. Consideration of the quality of that space can ensure that it serves the multiple purposes of enhancing biodiversity, providing ecosystem services,⁴⁷ creating opportunities for contact with nature and enhancing psychological well-being.”⁴⁸ Fuller’s study suggests that the biodiversity in a habitat affects our well-being—the more species diversity, the greater the positive impact on our health.⁴⁹

This research is consistent with my own experience of introducing hundreds of people to the Point Reyes National Seashore over the 35 years I have lived here. Invariably, when I run through a list of sights we might see (unless I am talking to a serious birder) and where in the park they would like to visit, Tule Elk and Elephant seals rank first then Chimney Rock's wildflowers in the spring, whales, seals, coyotes, bobcats foxes and large raptors such as bald Eagles, Ospreys and Peregrine Falcons. As we drive through the pastoral zone, or smell, hear or see something unpleasant related to ranching most ask about how and why ranches are allowed in the park? When juxtaposed with the excitement they express at seeing any of their preferred sightings, the ranches and cows, I now know, have triggered the brooding portions of their brains due to this discordant note from what they expected in a national seashore.

⁴⁷ Chester L. Arnold Jr and C. James Gibbons, “Impervious Surface Coverage: The Emergence of a Key Environmental Indicator,” *Journal of the American Planning Association* 62, no. 2 (1996): 243–58.

⁴⁸ James R. Miller, “Biodiversity Conservation and the Extinction of Experience,” *Trends in Ecology & Evolution* 20, no. 8 (2005): 430–34.

⁴⁹ Andrés R. Edwards, “Why 30 Minutes of Nature a Day Is So Good for Your Health - Yes! Magazine,” *Yes Magazine*, April 10, 2019, <https://www.yesmagazine.org/health-happiness/2019/04/10/health-nature-science-outside/>.

The National Park Service is custodian of our most treasured landscapes, cityscapes, and seascapes. These resources-- that nurture, sustain, and inspire us are now being valued and understood for their collective benefits as a health resource to the American public. Explore [this site](#) to learn how national parks help people enjoy healthier, happier lives.⁵⁰

It's hard to read that and think of the implications of ranching and the degree to which they will be intensified by the GMPA and not wonder how in the world did it come to this? For many Americans who love our national parks, who recognize the benefits they provide to all citizens and who believe fervently in passing them on not only unimpaired but improved for future generations, the precedent being set by PRNS is anathema to what a national park or seashore is supposed to be and opens the door to other such practices in other national parks.

⁵⁰ "What Works for Health - Health & Safety (U.S. National Park Service)," National Park Service, August 3, 2020, <https://www.nps.gov/subjects/healthandsafety/what-works-for-health.htm>.

VI. How Ranching Impedes Access

PRNS comprises some 71,028 acres of which 17,000 are underwater. That's the buffer that runs out 1/4 mile seaward under the Pacific and Tomales Bay borders of the park leaving just 54,028 acres above the tide line. The pastoral zone has 18,000 acres of PRNS under lease to cattle (a little over 33% of the terrestrial areas of PRNS). An additional 10,000 acres are leased for ranching in adjoining GGNRA lands along highway 1. PRNS also administers these lands. This section will describe several ways that ranchers deny access within not just the 1/3 of PRNS they lease but also through a larger swath of PRNS due to the footprint of their operations. They physically block it, they restrict and lower visitor numbers. The degradation caused by the ranches impairs the visitor experience by diminishing potential benefits, such as health, reinforces cultural aspects that work against inclusion and focus on economic priorities that invite exclusion. Combined, these actions make the park less welcoming to underserved communities and people of color and establish an unequal burden on access.

Just as a seawall diminishes public access, the 349 miles of fencing (plus the 50 additional miles under the GMPA), nearly 6,000 cows, buildings, infrastructure, heavy equipment, trucking, plowed fields, and new additions including herding dogs, chickens, goats and sheep will all reduce access to PRNS. In addition, the GMPA prioritizes ranching operations over visitation giving the NPS authority to limit or cease visitation to the ranch areas if it impairs ranch operations.

The Final EIS envisions greater visitor access if ranching was eliminated:

If alternative F, which calls for the elimination of ranching and limited management of Tule elk, were to be selected, an implementation plan would be developed to provide additional detail about expanded visitor opportunities. At that time, the visitor capacity would also be updated.⁵¹

The EIS cites numerous impediments to visitor access relating to ranching:

This analysis area includes the north district of Golden Gate managed as a part of Point Reyes. This analysis area is also mostly ranching land; therefore, the

⁵¹ Point Reyes National Seashore et al., *General Management Plan Amendment Final Environmental Impact Statement*, 2020, <https://parkplanning.nps.gov/showFile.cfm?projectID=74313&MIMEType=application%252Fpdf&filename=Point%20Reyes%5FNorth%20District%20Golden%20Gate%20NRA%20GMP%20and%20EIS%5F508%2Epdf&sfid=440519>, 216.

amount of visitor use that can be accommodated is directly proportional to the types of visitor access that can be provided on ranching lands.⁵²

While the assessments mention the inability to create parking on ranch lands as a barrier to visitor access (with the exception of the assessment of greater visitor access if ranching was eliminated) the assessments fail to cite the extensive dairy and cattle operations, the 349 miles of fencing, the infrastructure, plowed or silage fields that all present barriers to public access. Rather they are referred to as the "desired conditions."

New structures also limit access:

PRNS has recently authorized and permitted tens of thousands of square feet of new building space on seashore dairies. PRSRA applauds PRNS for allowing these important buildings to be constructed in the coastal zone.⁵³

The most limiting attribute constraining visitor use throughout Pierce Point Road and L Ranch Road is the quality of the visitor experience. Currently, a lack of infrastructure to support diversification of recreation opportunities and/or expansion of visitors to the area affects the visitor experience. The character of the L Ranch Road is gravel rather than paved and the trailhead lacks restroom facilities, except for a restroom facility at the bottom of the trail. Roadside parking occurs frequently given the small size of existing parking lots and inability to expand onto ranching lands. Most beach access requires moderate to strenuous hiking.⁵⁴

The EIS also cites the potential for increase visitation due to the expansion of ranching, including farm stays and farm stands. Both of these may well draw new visitors. But as the NPS is considering limiting visitation in the ranching areas based on a quota/reservation system, this could prove another barrier for visitors from underserved communities to access the park as this once free for all park would accept reservations (NPS uses vendors that charges for reservations) for visitors who could afford lodging and the expensive "boutique" (based on

⁵² Ibid., 218.

⁵³ Point Reyes Seashore Ranchers Association, "Re: Ranch Comprehensive Management Plan Environmental Assessment (EA)," June 2, 2014, <http://savedrakesbay.com/core/wp-content/uploads/2016/08/PRSRA-Scoping-Letter-with-attachments.pdf>.

⁵⁴ Point Reyes National Seashore et al., *General Management Plan Amendment Final Environmental Impact Statement*, 217.

prices of local ranch products such cheese, meats, chickens and ice cream) foods currently available in nearby towns that will be sold at farm stands on the ranches under the GMPA.

Such an approach would create a country club like atmosphere in these areas. It could create a less welcoming atmosphere for certain visitors and could lead to making the park less welcoming to visitors whose access has never been restricted to date at PRNS.

VII. The Marginalization of Indigenous Peoples of California

One of the aspects that surveys have shown deter people of color from visiting national parks is the marginalization or outright exclusion of all but white history in park exhibits and the degree to which visitation and staff are predominantly white.

As one Indigenous American remarked: "think about it, if my family wants to go on a picnic would we really choose to go there? We have a ten thousand-year history in the place and when we go there all we see are white people and their culture being celebrated. I don't think so."

The way national parks retell the history of the land can have significant impacts on who visits. Issues like is the history accurate? Is the history weighted unfairly toward one group or another? How is history managed in the park?

No race has a longer presence or more tragic aspect to their history at Point Reyes than the Indigenous Coast Miwok. They lived on these and surrounding lands for thousands of years until during a relatively brief period from 1817-1846 their land was essentially stolen from them. The Tule Elk had been killed off and Indigenous Coast Miwok were forcibly removed from their aboriginal lands by the Missions, Mexican landholders and other California settlers. Many were sent as conscripted laborers to work on ranches or to the mission in San Rafael. Many died from diseases associated with the Spanish Missions and the ranches, and some were killed at the hands of European settlers and state-sponsored militias.

Scholars don't agree on the technical merits of the term genocide to describe a four hundred-year history following the arrival of white settlers to the Americas when the population of indigenous Americans fell from an estimate 5 to 15 million to just over 200,000 by the end of the 19th century.⁵⁵ Since the majority of the deaths were related to disease, some scholars argue the intent needed to constitute genocide "to destroy in whole or part" is missing. But there can be no question that policy and practices carried out against indigenous peoples during this time (to name just one, the killing of Buffalo to destroy Indigenous people's food

⁵⁵ Donald L. Fixico, "When Native Americans Were Slaughtered in the Name of 'Civilization,'" HISTORY, March 2, 2018, <https://www.history.com/news/native-americans-genocide-united-states>.

sources) constituted textbook genocide.⁵⁶ Moreover, there were recognized genocides within the larger genocide.

This historical fact is important to the GMPA for a number of reasons, the primary one perhaps being it demonstrates the importance of inclusion in not only fostering a culture of health but in developing and adopting major policies in a National Seashore. When it does not occur, as in this instance, the more powerful party tends to dominate and project—wittingly or not—superiority.

The June 2014 letter the Point Reyes Seashore Ranchers Association (PRSRA) wrote to the NPS Superintendent, their scoping comments and op-eds call for a return to Shafter era ranching (Please see Appendix A). The Shafter era refers to two brothers who were partners in a law firm in San Francisco. They and another partner owned virtually all of the Peninsula (during most of this period) and created a system of tenant ranches that were operated from approximately 1858-1920.⁵⁷

The timeline of the Shafter era partially coincides with one of the darkest periods in California history--the California Genocide committed by white European settlers and the State of California against Indigenous tribes that occurred between 1848-1879. In 2019, California's Governor Gavin Newsom formally recognized and apologized for the California Genocide.⁵⁸

[The]state's first governor, Peter Hardenman Burnett, in a State of the State address to California legislators in 1851 referred to "the Indian foe" and called Native people robbers and savages. "That a war of extermination will continue to be waged between the races until the Indian race becomes extinct must be expected. While we cannot anticipate this result but with painful regret, the inevitable destiny of the race is beyond the power or wisdom of man to avert."⁵⁹

⁵⁶ J. Weston Phippen, "'Kill Every Buffalo You Can! Every Buffalo Dead Is an Indian Gone' - The Atlantic," May 13, 2016, <https://www.theatlantic.com/national/archive/2016/05/the-buffalo-killers/482349/>.

⁵⁷ Sadin, *Managing a Land in Motion*, 21.

⁵⁸ Erin Blakemore, "California's Little-Known Genocide," HISTORY, July 1, 2019, <https://www.history.com/news/californias-little-known-genocide>.

⁵⁹ Ibid.

During this period, "white settlers and the California government [enslaved](#) native people and forced them to labor for ranchers through at least the mid-1860s." ⁶⁰

Native Americans had never before been exposed to the Old World pathogens spread by the settlers and their domesticated cows, pigs, sheep, goats, and horses. As a result, millions died from measles, influenza, whooping cough, diphtheria, typhus, bubonic plague, cholera, and scarlet fever. ⁶¹

About 16,000 Indigenous Californians were killed through violent acts in the genocide. The state's Indigenous population, which had already fallen dramatically during Spanish colonization, dwindled to just 30,000 from around 150,000 before statehood. And long after the genocide ended discrimination against Indigenous Americans persisted.

Native Californian children were forced to assimilate into white culture and attend "Indian assimilation schools" like the Sherman Indian School in Riverside, CA. ⁶² There, they were forbidden to speak their languages or take part in tribal ceremonies...Poverty, health disparities and limited opportunities were, and still are, common. ⁶³

The ranchers and the GMPA essentially glorify that era. The ranchers like to say there would have been no park without them. There is certainly merit in the claim that they protected the area from widespread development. But the acquiring of that land, as with much of the land on which the national parks were created, trampled on Indigenous people's rights.

While the ranchers' intent was doubtless a nostalgic reflection on a time of unregulated industry and not the darker history of that period, it's likely to add yet another layer of concern that will impact Indigenous Americans willingness to visit PRNS. And if PRNS is to be a park for all, it can't ignore the fact that California has the United States' largest Indigenous American

⁶⁰ Ibid.

⁶¹ "The Native American Genocide And Its Legacy Of Oppression Today," All That's Interesting, November 21, 2016, <https://allthatsinteresting.com/native-american-genocide>.

⁶² Becky Little, "How Boarding Schools Tried to 'Kill the Indian' Through Assimilation," HISTORY, November 1, 2018, <https://www.history.com/news/how-boarding-schools-tried-to-kill-the-indian-through-assimilation>.

⁶³ "The Native American Genocide And Its Legacy Of Oppression Today."

population and is home to 109 federally recognized tribes with another 78 tribes petitioning for recognition.⁶⁴

A visit to Point Reyes will introduce Indigenous Americans to some jarring juxtapositions. The history of the park is dominated by the 170-year history of white European settlers who ranched the land and some would argue participated in a land grab by leasing and ultimately buying land from which Indigenous populations were forcibly removed. The thousands of years of Indigenous history on this land is detailed in a few Bear Valley Visitor Center exhibits and the Kule Loklo village. An attempt to sell "Indian tacos" at the site was shut down due to it not meeting State Health Department requirements.⁶⁵

Europeans relatively small sliver of time on the Peninsula receives far more attention at the Bear Valley Visitor Center than the Coast Miwok's. And the descendants have, under the same legal authority that allowed about an acre of park land to be used to create the living history exhibit of Kule Loklo, been leased more than 1/3rd of the park, 28,000 acres on which they continue to live and profit as did their ancestors. A return to the Shafer era, an even more intensive period of ranching in the pastoral zone when their fellow white European neighbors committed genocide against indigenous Americans, will not make the park more welcoming.

The NPS staff hold regularly scheduled monthly meetings with ranchers as well as innumerable informal meetings. There were no such meetings with stakeholder groups to discuss the implications of continued, let alone significantly expanded, ranching by the NPS, the County of Marin, the political office holders supporting ranching, the Department of Interior or the White House.

The NPS would claim that it fulfilled its obligation under NEPA by holding scoping meetings and providing opportunities for public comment. But under NEPA they have an obligation to look beyond environmental impacts and consider human impacts as well. There was virtually no outreach to these communities to discuss the impact the GMPA would have on their lives. The only opportunity was the public scoping process where over 91% of respondents out of 7,627 opposed ranching and only 2.3% supported it.

⁶⁴ Judicial Council of California, "California Tribal Communities," California Courts: The Judicial Council of California, 2020, <https://www.courts.ca.gov/3066.htm>.

⁶⁵ Sadin, *Managing a Land in Motion*, 276.

National Parks and the Antecedents of Cultural Avoidance

While the Coast Miwok have the most complex legacy for the NPS to address, many other racial and ethnic groups also share a complicated history--if not with Point Reyes, with the National Park system itself. The enslavement of African Americans led to countless injustices and horrors from which the country has yet to fully address or recover from and for which African Americans continue to suffer. For decades, the NPS followed Jim Crow laws in southern parks and imposed "separate but equal" facilities.

The legacy of segregation, predominantly white visitors, the presence of predominantly white, armed law enforcement rangers, the treatment of African Americans in rural areas a denial or minimization of their history in parks alongside a glorification of whites, and high fees are just a few of the historical legacies that made African Americans feel unwelcome and created a cultural mindset that persists today.

The NPS has recognized this issue and in some cases such as through the inspiring work of Betty Reid Soskin at the Rosie the Riveter/WWII Home Front National Historical Park, has taken action to make our parks both more welcoming by being more inclusive and accurate in retelling of their history.

By providing only a glancing view of native American culture and history, of African American, Latinx, Chinese, Japanese and other people of color's experience in inhabiting these lands and dwelling almost exclusively on white European settlers our national parks have created a culture that is self-fulfilling: oriented toward the white visitor who in many parks make up over 80% of visitors and unwelcoming to the many people of color who see their own histories marginalized or excluded altogether.

Our national parks do represent a mirror into America's soul with all its suffering, sorrow, sin, hubris, greed, corruption, prejudice, exploitation and inequality as well as our joy, triumph, hope, goodwill, generosity, abundance, courage, renewal and beauty. The numerous organizations dedicated to encouraging and facilitating people of color and underserved communities to visit national parks urge the NPS to engage and listen to these communities and strive to use that information to make parks more welcoming.

Figure 5: Separate and not equal in NPS.



As Greg Sarris Chairman and Chief, Graton Rancheria a federation of Coast Miwok and Southern Pomo groups said, "We just want a seat at the table."

Surveys show that many of the issues that arise from ranching and these new activities including hotel, food or other costs that are too expensive , difficulty parking, crowding, accessibility, reservations required and a feeling of being uncomfortable (usually related to one's culture being minimized or armed white law enforcement presence) may be the new normal for PRNS if ranching continues under this new GMPA.

Figure 6: Surveys demonstrating park inaccessibility by race and ethnicity.⁶⁶

Table 3:
Closed-ended Responses for Not Visiting NPS Units More Often,
by Race and Ethnicity (All Respondents)

	Total	White Non-Hispanic	Hispanic American	African American
Hotel/food/other costs too expensive	62%	59%	74%	70%
Don't know much about the parks	61%	57%	71%	75%
Distance	54%	52%	67%	63%
Units are too crowded	49%	49%	49%	32%
Reservations needed too far in advance	48%	47%	58%	45%
Parking difficulties	42%	40%	50%	46%
Lack information once inside parks	27%	24%	40%	40%
Entrance fees are too high	27%	25%	38%	33%
Service fees are too high	24%	21%	36%	29%
Units are not accessible	24%	22%	26%	31%
Units are not safe	11%	9%	24%	9%
Employees give poor service	8%	6%	14%	18%
Units are uncomfortable places to be	7%	5%	9%	18%

⁶⁶ Frederic I. Solop, K. Hagen, and David Ostergren, "Ethnic and Racial Diversity of National Park System Visitors and Non-Visitors," *NPS Social Science Program, Comprehensive Survey of the American Public, Diversity Report*, 2003, 1–13, <http://npshistory.com/publications/social-science/comprehensive-survey/ethnic-racial-diversity.pdf>.

VIII. Environmental Degradation of Point Reyes

Access in a national park transcends the mere ability of a person to go somewhere. Access, as Dr. Bratman and Dr. Fuller's research describes, also must account for the type of stimuli you are exposed to. If greater biodiversity leads to improved mental health benefits than discordant notes, such as the landscapes one encounters in the pastoral zone, may trigger what the researchers describe as the "brooding response." The GMPA will add 59 miles of additional fencing in unspecified areas.⁶⁷ In addition new species of farm animals such as chickens, goats, sheep as well as dogs, llamas and row crops that will create conflicts with the park's native wildlife. The GMPA will allow mobile slaughtering of these animals and point of sale farm stands to sell meat and other products in the park. The report has already commented on the negative impacts these additions will have on access related to making PRNS a more welcoming park.

According to the research cited in this report they will also impact visitors' sensory experience in the park, negatively impacting the mental health benefits that might otherwise occur. And, as discussed earlier in the section on people with disabilities they may impact these visitors disproportionately.

Following are a small sampling of recent photographs providing visual evidence of how ranching degrades the environment, the visitor experience--including mental and physical health benefits. There is significant scientific evidence on the environmental impacts of ranching in PRNS. These have been identified in numerous public comments and the NPS's own Environmental Impact Statement (EIS) on the GMPA.

I will also reference two lengthy noteworthy comments on the topic: James Coda, a former Assistant U.S. Attorney in the Northern District of California (San Francisco) where he handled environmental and natural resources cases for the United States. for the Department of Interior mostly involving the Park Service. Coda in a 36-page December 7th, 2020 comment to the California Coastal Commission writes on the legal and environmental aspects of water pollution and usage in PRNS stating "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."

⁶⁷ Point Reyes National Seashore et al., *General Management Plan Amendment Final Environmental Impact Statement*,.110.

Laura Cunningham Director of the Western Watersheds Project's 86-page December 9th 2020 submission to the California Coastal Commission

Figure 7: Hale bays and cows in Point Reyes National Seashore.



Figure 8: A manure spreader spraying liquid manure on field



Figure 9: *A herd of cattle grazing on dry grass.*



Figure 10: *Cow manure and tracks through soil.*



Figure 11: 'Historic' farm in frame on dry grass near cows.



Figure 12: Cattle on the seashore.



Whose Land is it? Entitlement at PRNS

While the GMPA states that ranchers will not be able to kill coyotes, bobcats and other wildlife that might predate their newly introduced farm animals, no detailed plan is provided as to how this will be accomplished and enforced. In fact the NPS has consistently failed to enforce environmental and other regulatory violations at PRNS in large part due to fear of recrimination from NPS or Interior in Washington who don't want to antagonize politicians they know are not above punishing them through the appropriations process. (see The Politics of Point Reyes Section)

Despite language which attempts to reassure those who fear such actions, ranchers have already demonstrated their contempt for the park's wildlife by categorizing native Tule Elk as "invasive" and lobbying to have them shot. And the GMPA will allow them to employ dogs (otherwise forbidden in most of the park) to protect their stock and both "standard and aggressive hazing" of elk that interfere with their operations. Moreover, the driver of the GMPA, the Trump Administration, chief of public lands William Perry Pendley said in 2017: "This is why out west we say 'shoot, shovel and shut up' when it comes to the discovery of endangered species on your property." ⁶⁸

Overlooked violations include overgrazing of cows (exceeding regulatory thresholds of numbers permitted), storing heavy equipment from businesses located outside the park, assuring minimum standards for housing, using the properties for non-permitted commercial purposes such as weddings. In addition there have been instances of environmental regulations being violated , and denying public access on their leased land beyond the 500' privacy perimeter around residences. A number of visitors claim ranchers told them they were trespassing and to leave "their" property even though they were well outside any residential areas in fenced pasture land. All these violations have occurred without any enforcement. While this is not to say there has been no enforcement, it has been selective and at times ignored.

The attitude that this is "their land" is pervasive. Their successful lobbying for more control of visitor access as represented by the new proposed restrictions in the GMPA is indicative of past behavior where they have attempted to assert nonexistent rights to deny public access. A

⁶⁸ Cassidy Randall, "Trump's Public Lands Chief Refuses to Leave His Post despite Judge's Order," the Guardian, October 10, 2020, <http://www.theguardian.com/environment/2020/oct/10/william-perry-pendley-bureau-of-land-management-refuses-to-leave>.

recent example occurred in April 2020 when the following sign was posted at the second gate of L Ranch Road.

Figure 13: Sign at the second gate of L Ranch Road denying access to the public amidst the coronavirus pandemic



At the time this was posted, the NPS had adopted a Covid-19-related policy that restricted access to the park to bike and foot travel only. When contacted, NPS officials stated they were not aware of the sign and it was not an official park sign. Within a matter of days the park issued a new policy which closed all public access to this area of PRNS including all of Sir Francis Drake from the L Ranch road turnoff to the conclusion of Sir Francis Drake Blvd. at Pierce Point Ranch--the same area now being proposed to limit the number of visitors.

When contacted about this decision, senior NPS officials claimed it was a law enforcement issue--they lacked the capacity to patrol this area. PRNS has six law enforcement personnel that are required to live in the park. When the park is fully open, they must manage thousands of visitors a day. Doubtless, all six were deemed "essential personnel", yet they could not manage the handful of people that were coming to the park during this period? It seems more than a

coincidence that the only part of the park they closed outright was the area ranchers had already posted an illegal sign announcing its closure.

The incident highlights the clout of the ranchers, their willingness to use it, and just how damaging to the public good the ranchers' sense of entitlement can be. One of the reasons the park was closed was concerns expressed by Marin County Health officials that small towns surrounding the park such as Point Reyes, Bolinas and Stinson Beach would be inundated with visitors threatening local residents with a greater risk of contracting Covid-19. It was a reasonable concern and certainly it would put local residents at more risk as they faced greater exposure when shopping or by driving a half hour or more to a more populated area to shop.

While this was a fair point with respect to small towns (and there were avenues to address that through messaging and enforcement), it ignored the vital role parks can play in a public health crisis).⁶⁹ The public has a right to access *their* park in good times and especially in bad when it is most needed.

Another reason was that some NPS staff were expressing concern about the safety of going to work. Even though there is considerable research on the mental health implications of lockdowns and on stress-related to pandemics such as suicide, depression, substance abuse and domestic violence, the NPS chose to completely close this section of the park while grocery store workers, first responders, health care workers and many others put themselves at risk to provide critical services to the public.

The mental health consequences resulting from this pandemic related to the loss of loved ones, illness, isolation, job loss, small business closures, housing loss, food shortages, childhood anxiety and developmental challenges, stress caused caring for children who cannot go to school while working, lack of access to normal recreational outlets, "cabin fever" and myriad other factors is staggering.⁷⁰

⁶⁹ Zeynep Tufekci, "Keep the Parks Open," The Atlantic, April 7, 2020, <https://www.theatlantic.com/health/archive/2020/04/closing-parks-ineffective-pandemic-theater/609580/>.

⁷⁰ [Nirmita Panchal](#), [Rabah Kamal](#), [Kendal Orgera](#) Follow @ [KendalOrgera](#) on Twitter, [Cynthia Cox](#) Follow @[cynthiacox](#) on Twitter, [Rachel Garfield](#) Follow @[RachelLGarfield](#) on Twitter, [Liz Hamel](#) Follow @[lizhamel](#) on Twitter, [Cailey Muñana](#), and [Priya Chidambaram](#) The Implications of COVID-19 for Mental Health and Substance Use <https://www.kff.org/coronavirus-covid-19/issue-brief/the-implications-of-covid-19-for-mental-health-and-substance-use/>

Think of a single mother living in an urban underserved community locked in a small apartment with young children. She may have few options to safely take her children outdoors. Residents of underserved communities won't have the resources to travel to other parks that offer a traditional national park experience and their communities likely lack green spaces anything like those accessible to wealthier residents of the Bay Area.

A visit to PRNS could be tremendously therapeutic. And we know that with appropriate distancing and masks outdoor recreation is one of the safest activities in this pandemic. That the ranchers would post a sign without authorization claiming to prohibit such activity, that they have lobbied for and received authority for the NPS to kill native wildlife that are far below their carrying capacity, that they have lobbied for and received authority for the NPS to limit visitors based on the operational needs of ranching are just a few of the many actions they have taken that demonstrates how diametrically opposed their presence in the park is to ideal of parks being managed based on laws and norms that serve the common good.

Reimagining Point Reyes: 'Restore it and They Will Come'

With political will, foresight and the elimination of ranching, the future of Point Reyes could be not only an inspiring story of environmental restoration but a model for managing our national parks in a time of climate crisis. It would restore the park for the benefit of this and future generations in adherence to existing laws governing resource protection:

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**⁷¹(Emphasis added.)

The park could adopt additional foundational documents including an environmental justice policy, a strategy for integrating PRNS in the region's community of health, a commitment to proactively reaching out to vulnerable and underserved populations to create a more welcoming park for these communities, maximizing the potential of PRNS' natural values to

⁷¹ "16 U.S.C. 459c - Point Reyes National Seashore; Purposes; Authorization for Establishment," Pub. L. No. Y 1.2/5; § 459c (2002), https://www.nps.gov/pore/learn/management/upload/lawsandpolicies_usc16sec459c_enablingleg.pdf.

create a resilient community better prepared to address the mental health implications of current and future crises.

Based on the FEIS, the elimination of ranching would allow for increased visitor access in these areas.⁷² The creation of a "Lamar Valley on the Pacific" would almost certainly increase visitation.

Alternative F would eliminate impacts on elk related to hazing and fencing and would allow for the freeranging population to expand across the planning area. Under both alternatives E and F, given the absence of predators and the need to keep elk within Point Reyes, population management would be needed at some point in the future, likely beyond 20 years.

Under alternative F, removing ranching operations would eliminate a unique experience for visitors to experience the role of ranching in California and in the historic districts, resulting in an adverse effect for visitors seeking those opportunities. However, other visitor opportunities related to experiencing natural sights and sounds would be expanded, and there could be additional recreational trail linkages and public opportunities through the adaptive use of ranch complexes no longer used for active ranching, resulting in beneficial impacts for visitors seeking these experiences. Similarly, the potential expansion of the elk population under alternative F would result in long-term, beneficial impacts for visitor use and experience related to observing elk in their native habitat.⁷³

According to the GMPA's FEIS, the downside of removing ranches is that visitors would be denied a "unique" experience to see ranching in California in a historic district. Removing ranching would not deny Californians that opportunity. Ranches in Marin and Sonoma counties are ubiquitous. Many have histories as long as those in PRNS and there are many that offer public access—including farm stays. Even in West Marin's historic districts in the Point Reyes area just outside of the National Seashore there are a number of opportunities for the public to experience ranches with equal or greater historical value than those found in PRNS.⁷⁴ And when you include ranches statewide, the opportunities rise exponentially.

But when you consider the health benefits for visitors outlined by NPS coupled with the unique natural attributes of wilderness, wildlife and water, there is only one place in the entire

⁷² Point Reyes National Seashore et al., *General Management Plan Amendment Final Environmental Impact Statement*.

⁷³ GMPA FEIS, Executive Summary, IX.

⁷⁴ <https://foodandfarmtours.com/>

state this could occur: PRNS. The FEIS claims that (assuming no new predators were introduced) it would be at least twenty years before the elk population would grow to the point where it would need management (relocation or culling).

If the park was restored, it would offer a unique experience of being the only National Seashore on the Pacific Coast with visitors could hike on trails alongside free ranging herds of native Tule Elk. Such a unique experience would likely increase PRNS's total economic value for the region. An increase in 20% of visitation would result in an additional \$73.5 million to the annual total economic value calculated by the NPS plus an additional \$250 million in mental health value using a conservative conversion of the Griffiths study described in the economics section of this paper.

In order to include underserved and vulnerable communities in these benefits a more proactive approach in reaching out to these communities accompanied by a plan for monitoring and evaluation should be developed.

To get a sense of what this region of the park could be, compare *Figure 14*, the reality of the park today, with *Figure 15*, lush native plants and elk in the fenced Tule Elk "Preserve" at Tomales Point.

Figure 14: PRNS Patoral



Figure 15: *PRNS Elk "Preserve" at Tomales Point.*



Ranch supporters say the land has been forever altered and that the problems associated with returning it to its natural state would outweigh the benefits. But there are relevant examples demonstrating the success of such projects. PRNS's own highly successful Giacomini Wetland's restoration of wetlands that had been diked and the contours of the land altered in order to boost dairy production during WWII has seen a significant transformation since it was completed in 2010. [Here](#) is a link to Hart mountain restoration where cattle were removed and with time lapse photography you can view the progress of the restoration.⁷⁵

⁷⁵ "Hart Mountain: Restoration of Riparian Areas Following the Removal of Cattle," Oregon State University College of Forestry, accessed November 22, 2020, <http://www.cof.orst.edu/hart/index.html>.



Figure 16: *Yellowstone's Lamar Valley.*

Figure 18 is Yellowstone's Lamar Valley. A paved road to the left of this image transverses the valley all the way to the East Gate of the park. Visitors are able to hike numerous trails along and into the valley or adjoining valleys where roads disappear. Some chose to simply observe from their car the abundant free ranging wildlife which include bison, elk antelope, grizzly bears, wolves, coyotes and bald eagles to name but a few species found in this valley. But the experience for all visitors is consistent. They are experiencing a pre-industrial portrait of our country.

Imagine what this area of the park would be like were it to be restored. What if the one third of the park now fenced like a maze, much of it denuded or covered in manure and invasive species and occupied by thousands of cows and the industrial components that support them were all removed and the land was restored? What if Tule Elk were released from their fenced-in "preserve" were over half of them perished in the last drought and allowed to roam and graze like the Bison in Yellowstone's famous Lamar Valley? Visitors could hike unimpeded along newly established trails from Tomales Bay through native plant meadows grazed by herds of Native Elk and other wildlife across an open expanse to the Great Beach, Esteros or Drake's beach.

There would be no danger from cows, or heavy trucking and industry. Instead of smelling manure, visitors would smell only salt air and native grasses. They would not see cow patties, manure ponds, and cattle-caused erosion. There would be fewer ravens predating endangered species, a fraction of the current methane release and a fraction of the pollution. Visitors would no longer suffer harassment by ranchers (yes there are numerous instance of ranchers telling

hikers to "get off my land" as well as signs warning the public not to enter) along the 19-mile stretch between Tomales Point and the Point Reyes lighthouse and along Drake's and Limantour Esteros. This most visited area of the park would go from eyesore to iconic. And the benefits of a visit to PRNS would be significantly enhanced.

Those who derive mental health benefits from the park may be particularly affected by vast open spaces and roaming herds of wildlife recalling what it must have been like before man began exploiting the planet. As someone who has introduced numerous trauma survivors to PRNS, I think this aspect is particularly relevant in our national parks where wildlife and untrammelled spaces put life in perspective and help reconnect bonds that were broken during the traumatic (usually man-made) event.

That such a vision is not already in place and is about to become even more remote in a national seashore which is protected by the most robust level of regulation speaks to the influence of the local ranching community and their ability to sway politicians at the local, state, and federal level to achieve their ends (more on this in the Politics of PRNS section).

The environmental benefits of visiting the park are not equally distributed and the burdens of the environmental and scenic impacts of ranching fall exclusively on visitors. It is a terrible irony that a national seashore created with a purpose to address issues of racial and social inequity related to environmental injustice should itself be degraded by the same system that foisted environmental inequity on the communities it was meant to serve.

It may be that decision-makers driving ranching in the park never realized the magnitude of benefits that a national park offers a community; they never thought to have their staff review the mountains of research online of racial and social inequity in our parks, the link to poor health outcomes in these communities, and the importance of national parks in the promotion of public health.

And they clearly never thought to invite vulnerable communities to discuss the potential ramifications of their actions or what benefits might accrue to these communities if the weight of all that power was lifted, ranching was removed, and that energy was applied to restoring PRNS to the breathing spot Conrad Wirth intended.

This report has provided summaries and links to just a fraction of the evidence of the health benefits that would accrue to those that visit PRNS. Visitors would finally be able to visit a truly iconic national seashore and be enthralled by the herds of free roaming wildlife at this Lamar

Valley of the Pacific. For some, the experience would be transformative provoking the intervention that breaks the cycle of extreme poverty and despair.

As the region reels from two major disasters, Covid-19 and climate change-induced wildfires, a restored Point Reyes maximizes the value of the park--not just financially but in individual impact in building mental health resilience in visitors. It not only can have significant impact on visitors current mental health, but future mental health as well. Preparing for the impacts of future disasters in particular their impact on mental health can and should be a major focus of PRNS.

The increase in repeated disasters and associated social stressors linked to global warming is likely to affect the mental wellbeing of billions of persons in the 21st century, increasing risk for depression, anxiety, PTSD, anger and violence, social disruption and displacement, and social conflict. This means that our current conceptual frame of disaster response will be too narrow to address the many problems created and exacerbated by climate change-disaster mental health no longer should remain the sole model guiding our preparation and response. We need an expanded view that encompasses diverse responses to match a greatly expanded set of threats.⁷⁶

PRNS: A Park Divided

This report has detailed several examples of how some management policies at PRNS, such as those concerning ranching, have been directed by politics rather than best practices and law. Another telltale that something is amiss at PRNS is the schizophrenic nature of its management policies concerning resources.

PRNS has engaged in numerous laudatory efforts to promote native plant and animal species recovery. The original tension in the park was not about ranching, which the framers assumed would simply be removed as the park matured. It was between preservation and recreation. But since the park took nearly a decade before enough contiguous properties were purchased

⁷⁶ Josef I. Ruzek, PhD, "Disaster Response, Mental Health, and Community Resilience," *Psychiatric Times*, January 27, 2020, <https://www.psychiatrictimes.com/view/disaster-response-mental-health-and-community-resilience>.

the evolution in thinking within the NPS had changed--both legally and philosophically--in the direction of preservation.

To be sure that tension still exists, but in many instances PRNS has successfully managed both imperatives. Yet when it comes to commercial operations the NPS--doubtless due to their fear of recrimination from Washington and their understanding that they are not autonomous but part of a system that is directed by whatever Administration is in office and whatever political actors have the power to influence key decision-makers in the Department of Interior--has demurred in favor of commercial operations.

For instance, every year from March 1st through June 30th the NPS closes Drakes Estero (where only non-motorized vessels are allowed) to prevent flushing of Harbor-seals during their pupping season. Yet they allowed oyster operations--using boats with motors--to continue year-round before the closure of DBOC. The NPS closes parts of Drake's Beach to protect habitat for Elephant Seals which have made an impressive recovery at PRNS over the last 30 years; large areas of beaches throughout the park are closed during summer months to protect the nests of an endangered species--Snowy Plovers. Yet the NPS's own research has shown that ranching attracts ravens that predate eggs in the plovers' nests.

Tule Elk, one of the most iconic species in PRNS, once roamed this peninsula in the thousands. Like Bison, they were killed by hunters and ranchers to near extinction. The ranchers refer to them as "an invasive species" and have demanded their removal from all ranched lands. Under the GMPA, a small herd will be allowed to remain at Drakes Beach. But many from this herd have been authorized to be shot. In addition, "standard" and "aggressive" forms of hazing will be allowed to be used against elk that stray onto ranch lands. A "preserve" was created that fences the largest herd into a small area of the park's northernmost tip at Pierce Point. Elk have died in significant numbers from lack of water and other resources due to this artificial arrangement not found in other national parks/seashores. Nonnative privately-owned cows are guaranteed adequate water through lease agreements and provided for with both locally grown non-native feed and feed transported into the park from outside vendors.

Point Reyes host more species of birds than any other unit in the national park system.

Yet cats can be seen in fields predating birds and other native wildlife. And the GMPA will allow for dogs to roam freely on the ranches and protect the newly arrived goats, sheep, chickens and row crops. The pollution created by ranching which is allowed to occur through "waivers" flows into Tomales Bay and the Pacific Ocean. All these waters lie within the Gulf of the Farallones

National Marine Sanctuary where a citizen can receive a steep fine for tossing a crust of bread into the water. But as with all the other activities listed above, ranchers have been allowed to carry out activities that if committed by visitors could lead to stiff fines or jail sentences.

In January 2019, elephant seals occupied the section of Drakes Beach adjacent to the Kenneth C. Patrick Visitor Center, and, at times, the parking lot and wooden ramps leading up to the visitor center. As a result, the entire Drakes Beach area south of the junction of Sir Francis Drake Boulevard and Drakes Beach Road was closed to the public to better protect the elephant seals from disturbance. If you follow the logic of the ranchers, it would make sense to just shoot them because they are interfering with the operations of the general public who in theory are the real owners of the park. Of course, no park-loving visitor would want that to happen because viewing wildlife and protecting them are primary reasons for our parks to exist.

Yet the NPS allows ranchers to serially violate existing laws protecting these and many other species. They plow under native plants and plant invasive species. The park's own EIS has detailed significant negative environmental impacts from ranching, including pollution, erosion, soils degradation, loss of native plant species, introduction of invasive, predation by ravens on endangered snowy plover eggs, pollution of waters supporting endangered coho salmon, methane from cattle, impacts of expansive fencing and infrastructure on visitation, to name a few. It's list in the FEIS of "Desired Conditions"⁷⁷ is being trampled upon by the desired outcome of ranching. Politics, not NPS existing regulations, not best practices, not the common good drives what the FEIS describes as the "desired outcome:" multigenerational ranching in a national seashore.

PRNS: Ranching and Climate Change

The focus of this paper is on restoring PRNS as a strategy for adapting the park to mitigate current and future mental health impacts of climate change-driven events.

But, this paper would be remiss to not acknowledge that the most critical aspect of climate change mitigation is stopping, or greatly reducing, pollutants at their source and how ranching at PRNS contributes to this problem.

⁷⁷ GMPA FEIS "Desired Conditions" Chapter 1 pg.2

Congressman Jared Huffman has proclaimed "Addressing climate change is the greatest imperative of our time. The stakes are enormous for our environment, our economy, and our planet."⁷⁸ Yet, he also wrote in a letter to then NPS director Jon Jarvis:

I am also gratified to see you re-affirm the Secretary's commitment that "ranching operations have a long and important history on the Point Reyes peninsula and will be continued at Point Reyes National Seashore" (Secretary's 29 November 2012 memorandum to you re Drakes Bay Oyster Company). That commitment is in accord with Congressional intent that agriculture is a compatible activity in, and should continue as a permanent part of, the Point Reyes National Seashore.

While longer-term lease/permits provide the ranchers with greater legal certainty, I believe we can and should do even more to ensure the continuing economic viability of ranches in the Seashore. In recent years, ranchers have requested—and to its credit, the Seashore administration has generally granted—permissions to diversify their agricultural pursuits.⁷⁹

Climate experts⁸⁰ and the Intergovernmental Panel on Climate Change⁸¹ agree that

Half of global human-caused emissions of methane, a greenhouse gas roughly [30 times more potent than carbon dioxide](#), comes from agriculture, namely livestock and rice cultivation. Up to 75 percent of nitrous oxide emissions — almost 300 times the warming potential of carbon dioxide — comes from nitrogen fertilizer. Of the 1.9 billion acres in the [48 contiguous states](#), 654 million acres are used as pasture land for livestock, 538 million acres are forested, and 391.5 million acres are used to grow crops. But of that cropland, only one-fifth is

⁷⁸ "Environment and Climate Change," U.S. Congressman Jared Huffman, accessed November 30, 2020, <https://huffman.house.gov/policy-issues/environment-and-climate-change?latest=147>.

⁷⁹ Jared Huffman, "Huffman to Park Service: Provide Needed Flexibility to Point Reyes Agriculture," U.S. Congressman Jared Huffman, April 16, 2013, <https://huffman.house.gov/media-center/press-releases/huffman-to-park-service-provide-needed-flexibility-to-point-reyes-agriculture>.

⁸⁰ Fountain, Henry. "Cutting Greenhouse Gases From Food Production Is Urgent, Scientists Say - The New York Times." The New York Times, November 5, 2020. <https://www.nytimes.com/2020/11/05/climate/climate-change-food-production.html>

⁸¹ P.R. Shukla et. al, IPCC" Special Report on Climate Change and Land, 2019.

used for the food we directly eat. One-third of US cropland is allocated to growing feed for livestock, like corn and soy.⁸²

The PRNS contribution to greenhouse gases were addressed in the NPS's FEIS. They are:

Activities associated with ranching would continue to emit criteria pollutants and greenhouse gases associated with cattle grazing, manure management on dairies, fugitive dust, and mobile source emissions.

The GHG emissions from livestock under Alternative B would represent approximately 21% of agricultural sector emissions in Marin County and 5.7% of the total county emissions.

Figure 17: Emissions from ranching in Point Reyes National Seashore.⁸³

TABLE 12: ANNUAL EMISSIONS FROM RANCHING AND MOBILE SOURCES UNDER EXISTING CONDITIONS (TONS/YEAR)

Activity	NH ₃	VOC	PM _{2.5}	CO ₂ -Equivalent (metric tons per year)
Ranching/Livestock Emissions	104.9	46.9	0.671	24,601
Mobile Source Emissions*	0.27	0.56	1.6 (including dust)	3,734

Ranching in the Park generates the equivalent of 24 thousand metric tons of CO₂/year, six-and-a-half times the amount generated by all the car traffic of the over two million annual visitors.

⁸² Umair Irfan, "UN Climate Change Report: We Must Change How We Use Land and Grow Food - Vox," Vox, August 8, 2019, <https://www.vox.com/2019/8/8/20758461/climate-change-report-2019-un-ipcc-land-food>.

⁸³ Point Reyes National Seashore et al., *General Management Plan Amendment Final Environmental Impact Statement*, 2020, <https://parkplanning.nps.gov/showFile.cfm?projectId=74313&MIMEType=application%252Fpdf&filename=Point%20Reyes%5FNorth%20District%20Golden%20Gate%20NRA%20GMP%20and%20EIS%5F508%2Epdf&sfid=440519>.

IX. The Economics of Point Reyes

The Economic Benefits of Point Reyes: Two Studies

The EIS does not provide an economic analysis of ranching in PRNS. In fact it appears there has not been a comprehensive economic analysis of ranching in PRNS. To do so would require an analysis of the opportunity costs as well as total economic value to the community, market conditions for dairy and beef, impacts on the health benefits that would typically occur in this area of the park, and what other economic benefits might accrue if the land was restored.

Based on the two studies cited in this section the measurable economic benefits of PRNS in 2019 to the local, regional and national economy exceed \$1.469 billion. Of this, 369 million was determined by an NPS study that reviewed an 8-year history of the total economic value related to tourism/visitation generated by PRNS.

An additional \$1.1 Billion dollars for the total economic value related to the mental health-related benefits was extrapolated from a 2019 study conducted by a team of researchers at Griffiths University in Australia published in Nature. This study determined that national parks globally generated some 6 Trillion USD in total economic value based on improved mental health. The study quantified the impacts of increased productivity from workers, a reduction in government sponsored mental health care costs and reduced costs for law enforcement and the criminal justice system from mental health-related expenditures.

From a policy standpoint related to ranching in PRNS, the issue is not whether this number is 100% accurate, it is that it is unquestionably large--much larger than even the total economic value of the park's own tourism-related value. And while research described in this paper has unquestionably identified physical health benefits that result from visiting a national park, there are as yet no methodologies that have been developed to quantify that value. Moreover, the impacts of 1/3rd of the park being ranched as described in the Stanford study on the brooding effect, the NPS's own EIS, the numerous public comments expressing distress over the environmental degradation in the ranched areas of the park, the research on issues that make a park less welcoming to people of color and underserved communities all point to negative impacts on the total economic value for the park resulting from ranching as well as diminished mental-health related outcomes due to ranching.

The Marin County Gross Domestic Product (GDP) in 2018 was \$24 billion (U.S. Bureau of Economic Analysis (BEA)). That is the total production of monetized goods and services. The

total value of agricultural production in Marin County in 2018 was \$94 million (Marin Co. Agricultural Commission). The ranches in PRNS contribute \$16 million of that figure. Agriculture is a very small part of the economy of the County at 0.4%.

Subsidies Analysis of Ranches in the Park

In the process of amending the General Management Plan (GMP) of the PRNS, during 2015-2021, the amendments applied to an area called the “park” which consists of the PRNS and the N. District of the GGNRA (Golden Gate National Recreation Area). Data to support an analysis of the costs and benefits of the ranches in the park is not available, but national and California data show that, on average, dairy and beef cattle operations lose money, that is they are a net loss, due to the large subsidies taken by these businesses.

The average subsidy to dairies in Marin Co. from 1995 to 2019 was \$27,000.⁸⁴ Expressed in terms of milk prices in 2015, subsidies nationally accounted for 45% of production costs and 71% of gross income.⁸⁵ The cattle industry is subsidized to a lesser degree, mainly through feed subsidies, representing about 6 percent of the wholesale price of beef nationally. The general view of agricultural economists is that most small dairies, such as these, lose money. In the park, ranchers pay about a third of the local market value for access to rangelands, a huge subsidy from taxpayers. Since the land and structures are owned by the government, taxpayers also pay for most of the ranch improvements and maintenance to roads, buildings, fences, and other infrastructure. It seems fair to say, jut based on these numbers, that ranches are a net economic loss. This is likely only to grow. State air quality regulations will make dairying more expensive in the future as they seek to control methane pollution. Increasingly strict state water quality rules also will make dairies and ranches more costly to operate due to erosion controls and manure management. Adding to these costs are the considerable costs of NPS monitoring, evaluating and enforcing the new regulatory framework for ranching developed in the GMPA.

In addition the cost of the air, water and land pollution, erosion, and biodiversity loss caused by the ranches should be calculated as part of any economic analysis.

⁸⁴ Environmental Working Group (EWG) <https://www.ewg.org/about-us>

⁸⁵ Ibid.

To describe total economic value of ranching in PRNS, ranchers have suggested the \$16 million they generate be multiplied by a factor of 2.5. This would bring the total amount to \$40 million dollars which accounts for support the industry provides to services like veterinary services, restaurants, to feed suppliers and heavy machinery producers.

(It is important to point out that these benefits would not accrue exclusively to Marin but also Sonoma which shares a significant amount of the suppliers as do other area that may be used to purchase feed or machinery etc.)

Unlike the total economic value of tourism and the healthcare costs that accrue from visiting the park which have relatively low costs (such as the greenhouse gas emissions of vehicles which, while not insignificant, nonetheless account for less than a sixth of the greenhouse gas emissions generated from cows in the park).⁸⁶ Moreover the diesel powered semi-trucks which according to the FEIS presents a significant danger to cyclists and foot traffic in the park--are along with diesel powered farm equipment a source of gross vehicle pollution that would be eliminated with the removal of the ranches.

Determining value between the Ranches and Tourists

The GMP amendments propose to make the ranch leases permanent, by extending them for current owners to 20 years and when those owners sell, to envision them running with other owners forever. Since the ranches operate as a net loss and tourism and health-related benefits results in a far more substantial economic net benefit, a major issue is the effect of ranching on tourism.

The over 2.4 million tourists coming to the park in 2019 spent about \$102 million in West Marin Co. That spending supported about 1,090 jobs in this region.⁸⁷ In 2019, this value was \$54 million in labor income and an additional \$128 million in economic output plus \$85 million in value added bringing the total economic value of PRNS tourism to \$369 million in 2019.⁸⁸ (In 2017, all visitors to the County spent \$803 million⁸⁹ and in 2017 PRNS's total economic value was \$377.2 million⁹⁰). So, visitors to this park are a significant fraction of tourism in the County.

⁸⁶ Point Reyes National Seashore et al., *General Management Plan Amendment Final Environmental Impact Statement*.

⁸⁷ National Park Service and U.S. Department of the Interior, "2019 National Park Visitor Spending Effects: Economic Contributions to Local Communities, States, and the Nation," 2012-2019, April 2020.

⁸⁸ Ibid.

⁸⁹ Marin County Visitors Bureau

⁹⁰ National Park Service and U.S. Department of the Interior, "2019 National Park Visitor Spending Effects," 2020.

Tourists create relatively small costs that fall onto the park and the County, for roads, facilities, police, bathrooms, and other facilities.

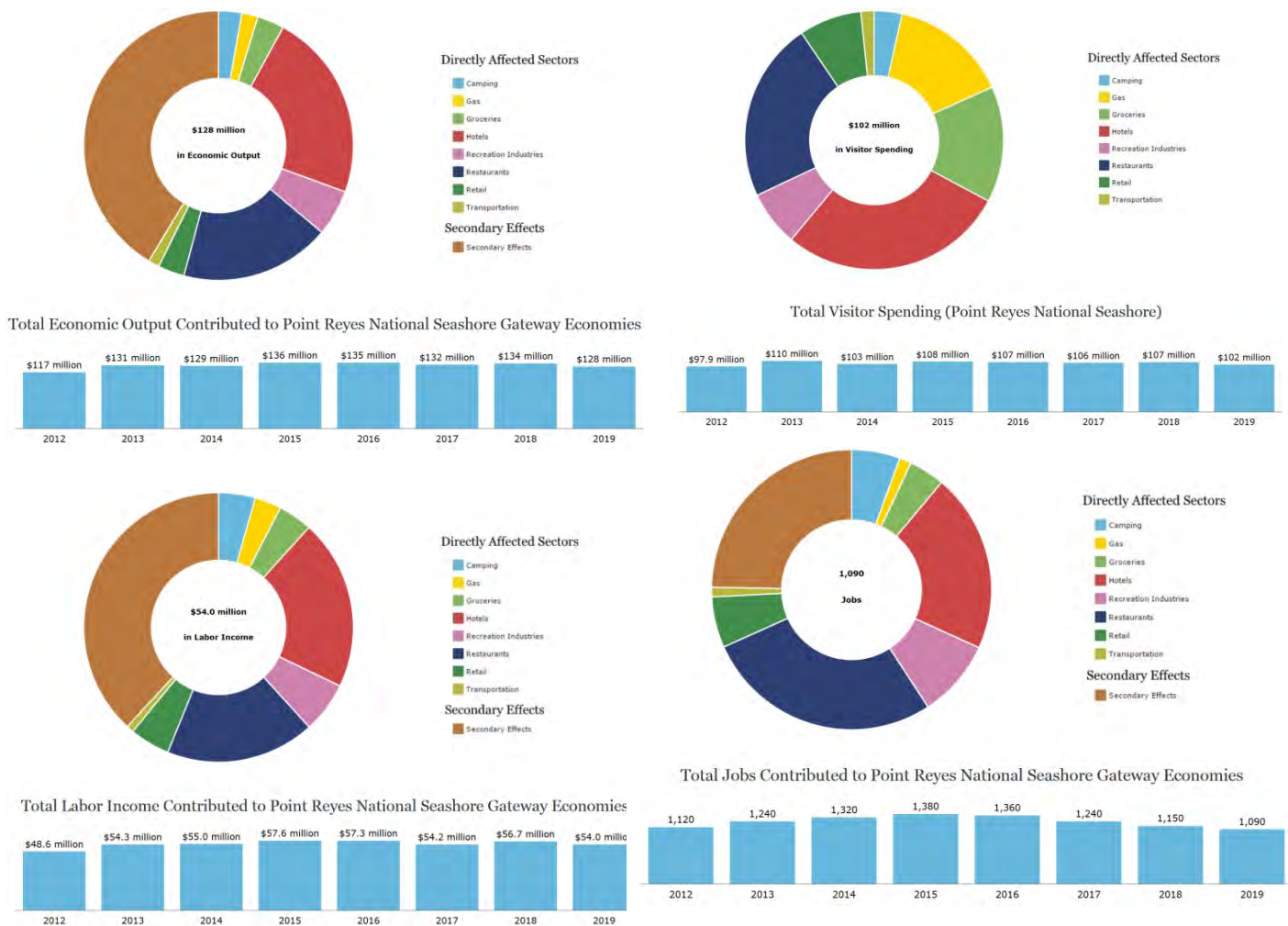
In summary, the ranches appear to be a net loss to the nation and County, while tourists and the considerable health benefits from a national park are a significant net benefit to the nation and County.

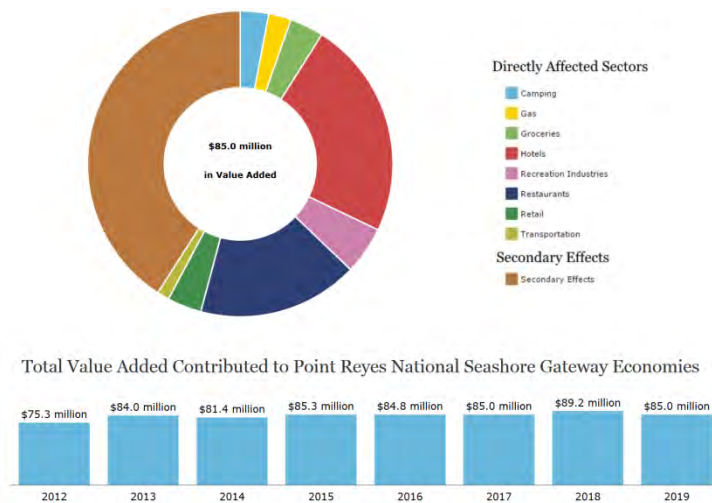
It is clear that ranching limits visitation as described in the chapter on access. To determine how removing ranching might increase visitation, the overwhelming public opposition to the proposed GMPA where 91.4% opposed ranching and only 2.3% of 7627 respondents supported continuing ranching is a strong indication. In fact, many commenter's stated that they disliked the ranches due to the widespread overgrazing, bare fields, manure piles, smells, and other nuisances. The ranches lead to a loss of tourist spending, which then make them an even larger net loss to the county and the nation.

The Studies

The two studies presented in this section quantify two different economic benefits of PRNS. The first is based on an interactive tool developed through a collaboration between the National Park Service and the U.S. Geological Survey that allows users to retrieve data for any national park unit from the Visitor Spending Effects report series. Below are a series of pie charts derived from this tool for 2012-2019. The figures have remained relatively consistent over this period, but as a reference PRNS created \$369 million in non-AG related economic benefits and 1,090 jobs in 2019.

The second study emanates from Australia and uses standard economic methodologies to calculate the monetary value of mental health benefits provided by national parks. Economic benefits from health are not included in the NPS analysis. Given the nature of the data and the fact that it originates from Australia, extrapolating these numbers is imprecise. However, the authors do state that given that the United States has the highest health care costs in the world (\$10,586) per capita annually, more than twice that of Australia's per-capita annual rate of (\$5,005) it is safe to assume that the quantifiable economic benefits resulting from improved mental health impacts are significantly higher in monetary terms in the U.S. than in Australia.

NPS Visitor Spending Effects Report.⁹¹⁹¹ Ibid.



"The methods used in this total economic value study are fully consistent with other valuation efforts within the federal government to analyze proposed regulations, evaluate environmental compliance alternatives, quantify losses of natural resources from oil spills, and other purposes. This study was peer-reviewed and will be submitted for publication in academic journals."⁹²

⁹² National Park Service, "National Park Foundation Announces Study Determining Value Of America's National Parks To Be \$92 Billion - Office of Communications (U.S. National Park Service)," National Park Service, June 30, 2016, <https://www.nps.gov/orgs/1207/06-30-2016a.htm>.

The text box summary below describes methodologies for quantifying the value of mental health benefits produced by nature exposure.

Nature and mental health: An ecosystem service perspective

Valuation and decision-making contexts.

Gregory N. Bratman, Christopher B. Anderson, Marc G. Berman, Bobby Cochran,

Sjerp de Vries, Jon Flanders, Carl Folke, Howard Frumkin, James J. Gross,

Terry Hartig, Peter H. Kahn Jr., Ming Kuo, Joshua J. Lawler, Phillip S. Levin, Therese Lindahl, Andreas Meyer-Lindenberg, Richard Mitchell, Zhiyun Ouyang, Jenny Roe,

Lynn Scarlett, Jeffrey R. Smith, Matilda van den Bosch, Benedict W. Wheeler, Mathew P. White, Hua Zheng, Gretchen C. Dail

There is a considerable literature describing the monetary valuation of mental health. Analyses have focused on the avoided costs of mental illness and on the economic benefits of happiness, well-being, and thriving. A range of methods has been used in these cases, including direct market valuation, indirect market valuation (avoided cost, factor income, hedonic pricing, etc.), and contingent valuation ([106](#)). In general, mental distress and mental illness account for considerable costs, and relief of such suffering yields large benefits for society and the individuals affected ([107](#), [108](#)). Improved learning and work productivity resultant from nature contact may also have positive economic impacts ([109](#)).

However, monetary value is only one of many ways to quantify the mental health benefits produced by nature exposure. Many noneconomic measures of quality of life, well-being, and happiness have been developed ([110](#)), both in clinical settings and in sustainability science, and these may have a role in valuing mental health as an ecosystem service. One example is the DALY, now a standard currency in quantifying burden of disease and potentially suitable in ecosystem services calculations. Another form of valuation includes a ranking approach (rather than absolute values) that projects the expected relative benefits of alternative scenarios of change in a specific location.

These valuation approaches can help reveal the contribution of ecosystems to mental health in decision-making. With a more complete picture, decision makers can more fully consider the repercussions of losing or enhancing access to nature, in the context of urban design, including the spatial layout of built and natural environments, and proximity to workplaces and homes. Valuation can help inform judgments of whether to invest in nature and how to do so while also considering other pressing needs. Our knowledge regarding the magnitude of mental health benefits on their own may not be enough to justify the costs associated with increasing nature within cities, but together with benefits such as water quality, flood security, urban cooling, and recreation, we can obtain a more complete picture of the impact of these types of decisions.

Nature and <https://pubmed.ncbi.nlm.nih.gov/31355340/%20mental%20health%20An%20ecosystem%20service%20perspective%20Science%20Advances.htm>

A study was done in Australia in 2019 by Griffith's University researchers and published in *Nature Communications* to ascertain the economic value of protected areas (e.g. National Parks) attributable to the improved mental health of visitors.⁹³ “Health services value” is defined as the reduction in costs to human economies via the improved human mental health and wellbeing associated with open-space visits.⁹⁴

The study found that “there is a direct link between protected area visits and individual human mental health and wellbeing, which translates to a very substantial but previously unrecognized economic value,” and that this value far exceeds that of both tourism to these areas and the budgets allocated to maintain them.

The study results ascribe a minimum of approximately \$500 health services value per visit to open spaces and a minimum of approximately \$9,100 visitor. There were 2.4 million visits to Point Reyes National Seashore in 2018, which is estimated as a turnstile-like figure by the National Park Service.⁹⁵ Therefore, the minimum health services value attributable to PRNS is \$1.15 billion. Depending on how many individual visitors accounted for the 2.4 million visits (considering how many people are repeat visitors in a year) the number could be significantly more. For example, if the average number of visits per visitor is 4, then the number of visitors is 600,000, and the associated health services value scaled on a per-visitor basis is \$5.46 billion. Even if the average number of visits per visitor is 10, the number of individual visitors is 240,000 and the associated health services value is \$2.18 billion.

These calculations assume the myriad relevant social and economic factors are equitable between Australia and the US. “Protected area visitation patterns, however, and the dependence of quality of life on age, income, education, gender, family factors, and exercise, may differ considerably between countries and cultures.” And whereas this is a broad assumption, one reliable and salient variable is that health care costs in the US are roughly twice that in Australia,⁹⁶ implying that, if anything, grafting this analysis on to the US discounts the associated economic value.

⁹³ Ralf Buckley et al., “Economic Value of Protected Areas via Visitor Mental Health,” *Nature Communications* 10, no. 1 (November 12, 2019): 5005, <https://doi.org/10.1038/s41467-019-12631-6>.

⁹⁴ *Ibid.*

⁹⁵ “Park Statistics - Point Reyes National Seashore (U.S. National Park Service),” National Park Service, June 22, 2020, <https://www.nps.gov/pore/learn/management/statistics.htm>.

⁹⁶ Roosa Tikkanen and Melinda K. Abrams, “U.S. Health Care from a Global Perspective, 2019 | Commonwealth Fund,” The Commonwealth Fund, January 30, 2020, <https://doi.org/10.26099/7avy-fc29>.

The study quantifies the economic value of mental health benefits that derive from visiting national parks. The researchers used the \$/QALY calculation a standard way to make decisions around healthcare spending priorities to determine that National parks worldwide are worth about \$8.7 trillion (\$US6 trillion) a year in the improved mental health of their visitors, according to initial estimates published by the team of Griffith University researchers. The study showed the mental health benefits lead to trillions of dollars of economic benefit from more productive economic output in addition to reduced health care and criminal justice system costs.⁹⁷

Currently, the costs of poor mental health in Australia amounts to approximately 10% of GDP, and the researchers' estimates indicate that these costs could be 7.5% higher without protected areas such as national parks. The economic costs of poor mental health include treatment, care and reduced workplace productivity and affect individuals, families, employers, insurers and taxpayers. The health-related benefits of spending time in nature are thought to include improved attention, cognition, sleep and stress recovery.

"This value already exists, it just was not recognized." People already visit parks to recover from stress. In healthcare terms, it's patient-funded therapy. Without parks, costs of poor mental health in Australia would rise by \$145 billion a year."

The economic costs of poor mental health include treatment, care and reduced workplace productivity and affect individuals, families, employers, insurers and taxpayers.

Mental Health in the United States

It was predicted (pre-Covid-19) that the 2020 total U.S. expenditure on mental health services will reach some 238 billion dollars. Common mental disorders in the U.S. include anxiety disorders, depression, bipolar disorder, obsessive compulsive disorder (OCD), and dementia. As of 2017, around 15 percent of males and 22 percent of females reported some mental illness in the past year.⁹⁸

⁹⁷ Carley Rosengreen, "Research Estimates Value of Impact National Parks Have on Mental Health," Griffith University News, accessed November 22, 2020, <https://news.griffith.edu.au/2019/11/13/research-estimates-value-of-impact-national-parks-have-on-mental-health/>.

⁹⁸ Statista Research Department, "Total Mental Health Services Expenditure U.S. 1986-2020," Statista, October 31, 2014, <https://www.statista.com/statistics/252393/total-us-expenditure-for-mental-health-services/>.

These disorders can lead to myriad other societal costs often involving the criminal justice system and include substance abuse, suicide, domestic violence, and child abuse.

Will Shafroth, president of the National Park Foundation here in the U.S. said of the Griffith University study:

Every day, we hear about the life-changing and enriching experiences of visitors to our national parks. While these experiences provide spiritual, emotional, and physical value to these visitors, this groundbreaking study documents the economic value the American public recognizes that our national parks give to our country.⁹⁹

Dr Ali Chauvenet, one of the co-authors of the study, said poor mental health lowered workplace productivity and was felt by everyone in the community.

Professor Buckley said he hoped the findings would give a good indication of the inherent value of national parks, which he feared was becoming overlooked.

He said many parks departments were under pressure to try to generate money from their parks by partnering with tourism operators, but the research showed the parks themselves should be the focus.

“From a state treasury perspective you get a bigger return from parks if you can get a lot of people to go for free,” he said.

“If you encourage people to enter parks and you pay the parks service to run those parks then the payback in terms of improved mental health and productivity is much, much bigger than anything you would get out of tourism development.”¹⁰⁰

“National parks were not created to be the economic contributors that they are. They were created to preserve and protect these wonderful, natural, historic and cultural landscapes of the country,” said Jeffrey Olson, chief of communications at the National Park Service’s Natural

⁹⁹ Sean Fleming, “This Is the Economic and Health Value of National Parks,” World Economic Forum, November 22, 2019, <https://www.weforum.org/agenda/2019/11/national-parks-mental-health-wellbeing/>.

¹⁰⁰ Stuart Layt, “The Simple Way National Parks Are Worth \$145 Billion to the Economy,” November 13, 2019, <https://www.brisbanetimes.com.au/national/queensland/the-simple-way-national-parks-are-worth-145-billion-to-the-economy-20191112-p539yi.html>.

Resource Stewardship and Science directorate. “It just so happens that because we get more than 300 million [people] that come visit us every year, there’s also this economic value that they leave behind in the communities they visit.”¹⁰¹

Total Economic Value for PRNS, 2019

The NPS defines economic output as “a measure of the total estimated value of the production of goods and services” supported by park visitor spending. The entire system of national parks had an economic output of \$37.8 billion in 2017,¹⁰² and as described above \$369 million for Point Reyes. But when we apply the Griffith methodology to PRNS we derive a conservative estimate of 1.1 Billion dollars in total annual economic value with a visitation number of 2.25 million annual visitors. This applies to health care costs savings, improved productivity, higher economic outputs due to improved worker productivity and a decrease in criminal justice-related costs. (the same areas analyzed in the Griffith study.)

These figures bring the total economic value for PRNS in 2019 to 1.469 billion dollars.

Jobs

PRNS generated over 1,090 jobs in 2019 according to the NPS analysis provided above. The ranches reportedly generate 63. If the ranches are removed it is likely visitation would go up and more jobs would be created. For those ranch workers who would lose their jobs, programs would need to be established to assist these workers with assistance, housing and training to ease their transition. The median salary of Agricultural workers (countywide) is \$13,000 a year. According to the Marin County Agricultural report, they are the lowest paid workers in the county. The opportunity exists to help these workers escape their own cycle of poverty.

The park was ostensibly created to address environmental justice issues related to people of color and underserved communities. Yet over time the very park that was mandated to be free and expected to be managed in a way that would ensure these communities a traditional national park experience, was itself allowed to be degraded by a small but powerful group of

¹⁰¹ Janet Nguyen, “What Are the Economic Benefits of a National Park?,” *Marketplace* (blog), February 26, 2019, <https://www.marketplace.org/2019/02/26/what-are-economic-benefits-national-park/>.

¹⁰² National Park Service and U.S. Department of the Interior, “National Park Visitor Spending Effects: Economic Contributions to Local Communities, States, and the Nation,” April 2020.

commercial stakeholders. Restoring PRNS could serve tens of thousands or more who for various reasons have felt excluded from this park or whose visits were tainted by what they saw as exploitation.

Public Opinion Research on Ranching in Point Reyes

There appears to be little in the way of credible public opinion polling to assess the public's position on continuing ranching in Point Reyes. The evidence that does exist consists of the following:

- 1) National public opinion polling on National Parks
- 2) Public comments on the NPS scoping process (the General Management Plan Amendment)
- 3) National Parks Foundation
- 4) YouGov Survey

Of the available data sets, the NPS scoping process provides the only data that was specifically focused on ranching in PRNS and where respondents were presented with a range of options as well as specific content regarding what those options entailed. Moreover, unlike surveys, which involved checking boxes in answer to multiple choice questions, there were no limitations for length of comments in the scoping process.

National Polling:

There are a number of national surveys available involving questions regarding support for National Parks and how Americans want them to be managed. These consistently show protecting wildlife and park resources for future generations as the highest priority.

1) The Hart Poll^{[1] 103} is of registered voters. It finds:

- 95% of voters agree that protecting and supporting National Parks is an appropriate role for the federal government today.

¹⁰³ Hart Research Associates and North Star Opinion Research, *Strong Bipartisan Support For National Parks*, 2012, <http://www.parkpartners.org/Strong-Bipartisan-Support-For-National-Parks.html>.

- Strong majorities of voters think it is very or fairly likely that a candidate who considers our National Parks to be important:
 - would be someone who cares about the environment (89%)
 - will protect our heritage for future generations (82%)
 - is a good steward of our nation's resources (76%)
 - is forward looking and thinks about the future (71%)
 - understands what makes America special (67%)
 - is patriotic (67%)

These associations are largely shared by Democrats, Independents, and Republican voters alike.

The YouGov survey^[2] review showed that 90% of Americans consider the conservation and preservation of US National Parks important and that a majority of Americans wanted more national parks.¹⁰⁴

A 2016 study by the National Parks Foundation provided the first ever comprehensive economic evaluation of the Americans National Parks. ([link here](#)) "The study, a reporting of total economic value, clearly demonstrates the public's shared perception of the incredible benefits of national parks and programs, whether they personally visit parks or not." It found that:

- 95% of the American public said that protecting National Parks for future generations was important
- 80% would pay higher federal taxes to ensure the protection and preservation of the National Park System.

GMPA Public Comments:¹⁰⁵

As part of the scoping process for the GMPA, the Park Service was legally obliged under NEPA to accept public comments on the Plan. More than 7,600 comments were received. They are available online from the NPS:

¹⁰⁴ Ibid.

¹⁰⁵ Appendix B Categorization of Public Comments on the Point Reyes National Seashore Draft Environmental Impact Statement for a General Management Plan Amendment

https://www.nps.gov/pore/getinvolved/planning_gmp_amendment_deis_public_comments.htm

There were two public meetings where the public was also invited to offer verbal and written comments, but these data is not publicly available.

An analysis of the comments as well as the methodology in analyzing and aggregating the data can be found at: <https://restoreptreyesseashore.org/comments-to-draft-plan/>.

The analysis showed that over 91% (6,969) of the 7,627 respondents opposed the preferred plan (Alternative B) on various grounds. Of all public comments which endorsed any specific plan explicitly (1,859), over 94% (1,751) endorsed the plan that removes ranching altogether (Alternative F). The report also notes that the comments convey “a strong sense of betrayal and cynicism regarding the perceived misuse of public lands, cruelty to wildlife, allegiance to commerce and politics over commonwealth, and shortsightedness with respect to climate change and endangered species.”

The operative legal process only required the NPS to consider “substantive” comments, which are defined as questioning the accuracy or adequacy of the plan, suggesting alternatives, or causing revisions ([link](#)). On this basis, a large number of the comments were ignored in the final plan, including value judgments such as “it’s wrong to kill native species in a national park,” etc. Nonetheless, the referenced analysis considered every comment submitted, since its goal was to gauge public sentiment rather than satisfy the letter of any law.

X. The Politics of Point Reyes

A Tale of Two Presidents

President Theodore Roosevelt:

I want to ask you to keep this great wonder of nature as it now is. I hope you will not have a building of any kind, not a summer cottage, a hotel or anything else, to mar the wonderful grandeur, the sublimity, the great loneliness and beauty of the canyon. Leave it as it is. You cannot improve on it. The ages have been at work on it, and man can only mar it.

Here is your country. Cherish these natural wonders. Do not let selfish men and greedy interests skin your country of its beauty, its riches, or its romance.

President Donald Trump:

You know, they came to my office, a lot of the senators that I just introduced and Ron and everybody. They came to my office. They said that this will make us and make you the number one environmental president since Teddy Roosevelt. I said, huh, that sounds good. Because I wasn't going to do it. I figured, you know, let's not do it. But when they said that, that was like a challenge. Number one since Teddy Roosevelt. Who would have thought, Trump is the great environmentalist? I am, I am.

I don't think science knows, actually, it'll start getting cooler. You just watch.

The PRNS GMPA will:

- Undercut environmental regulations safeguarding the most protected public lands in the nation
- Further diminish the critical role parks play in promoting and improving public health which will have its greatest negative impacts on underserved communities and people of color
- make PRNS less welcoming for underserved communities and people of color

- Further degrade the environment
- Mandate the government kill native species still in the process of recovery
- Exacerbate climate change
- Ignore significant financial losses due to ranching for the local, regional and national economy and diminish significant financial gains generated by PRNS
- Reinforce the stigma of our national parks being heavily weighted toward wealthier, white Americans
- Be a huge giveaway to a small group of ranchers (at least some of whom are wealthy) receiving government subsidies for over 50 years who have used anti-environmental legal and lobbying groups--some paid with public funds--to guarantee support for a plan that ranchers who wrote it say will return them to a period some 150 years ago described as the "Shafter era."
- In the ranched areas it will limit access and diminish the experience and benefits of visiting a national park at a time of great need

The issue of ranching at PRNS came to President Trump's attention through an invitation to PRNS rancher Kevin Lunny who appeared with the President at a White House event announcing an Executive Order on government transparency which the president characterized as "just the latest step in my administration's tireless fight to curtail job-killing, soul-crushing regulations."

Following Mr. Lunny's providing the American people with his version of the closure of Drake's Bay Oyster Company, he discussed his fear that the same thing could happen to PRNS's 24 ranches. President Trump responded, "We'll have somebody right here in the White House looking at it, Kevin, so this doesn't happen to other people."¹⁰⁶

Following that meeting the Trump administration's Interior Department, became the most powerful advocate for the GMPA. The directive by Interior to approve as requested almost everything the ranchers were asking for went from the Oval Office to the Department of Interior to the National Park Service whose job it was to carry out the Administration's policy for Point Reyes.

¹⁰⁶ Will Houston, "Trump Criticizes Drakes Bay Oyster Co. Closure before Signing Transparency Orders – Marin Independent Journal," Marin Independent Journal, October 12, 2019, <https://www.marinij.com/2019/10/10/video-trump-criticizes-drakes-bay-oyster-company-closure-before-signing-transparency-orders/>.

The Final EIS repeatedly cites, in almost Orwellian terms, the "desired outcome" as an explanation of why and how management decisions are being made by the NPS. Yet the selection of Alternative B clearly is the most contrary option to the "desired conditions " such as promoting native plants and protecting native species that comprise the list of desired conditions cited in the FEIS.¹⁰⁷ To understand the "desired outcome" one need not read through the entire GMPA or the Final EIS. One need only to read the 2014 PRSRA letter to the PRNS Superintendent and the comments they and individual ranchers submitted for the public scoping process. The short version of the "desired outcome" is that multi-generational ranching is important economically and ecologically in Point Reyes, that the ranchers want to go back in time 150 years and return to the "Shafter era" of ranching and all this is "fully consistent with Congress's intent for the management of Point Reyes National Seashore."

This evidence base compiled for this paper demonstrates that ranching is harming both the environment and the economic value of PRNS. It also points to the written history and legal documents which clearly demonstrate that , while there were and are certainly supporters of this desired outcome, the early framers of the park did not think ranching should remain in the park. And the 1962 Enabling Act did not address the issue of how and under what terms ranching would continue in the park--once/if they actually became part of the park. When the NPS and ranchers finally came to an agreement on the sale of their properties, the terms contained a finite date at which time ranching would be eliminated. There was no legal basis for them to stay once the ROP expired and ranchers agreed to that. It wasn't until years later that rancher's successfully lobbied for an amendment that allowed the Secretary of the Interior to allow 5-year leases under the constraint that they must not impair existing laws relating to natural resource protection.

That something so insulting to "America's Best Idea" should be proffered by the Trump Administration is not surprising. Under this administration we have seen national monuments reduced, regulations abandoned, endangered species delisted without a scientific basis, protections removed and now a handover to commercial interests of more than 1/3 of a park that 2.5 million people visit each year.

Jared Huffman and Diane Feinstein

¹⁰⁷ GMPA FEIS, "Desired Conditions" Purpose of and Need for Action Chapter 1

Although the Trump administration committed to the rancher's Shafter era plan, they came late to the party. There were a host of players whose decades long support provided the oxygen for the plan to survive into the Trump Administration.

First among them was PRNS Superintendent John Sansing who had a 25-year career at PRNS, retiring in 1995. Mr. Sansing supported the ranchers and encouraged ranchers to lobby Congress for legislation that would allow them to break the terms of their agreements to sell.

In 1992 Diane Feinstein was elected to the Senate. When Trump directed Interior to help the ranchers it was icing on the cake. Senator Feinstein, with a huge assist from Rep. Jared Huffman had already put that play in motion.

I firmly believe that multi-generational ranching and dairying is not only important both ecologically and economically for the area, but also entirely consistent with Congress's intent...I'm working with the National Park Service and surrounding communities to ensure that the Ranch Comprehensive Management Plan expected by the end of the year will allow for continued ranching at the Point Reyes National Seashore," she said. "I strongly believe that ranching in the area is entirely consistent with Congress's intent when it established Point Reyes and will continue to support that belief in Congress."¹⁰⁸

This paper describes how ranching does both serious ecological and economic harm to PRNS. It describes how some of the most impoverished children in the Bay Area receive scholarships to attend programs at PRNS and when they visit the pastoral zone they are experiencing a ranch and not a park. Senator Feinstein has used her influence and political savvy to maintain ranching at PRNS. For nearly 30 years, until President Trump's entry into this issue, Senator Feinstein with her powerful seat on the Senate Appropriations Subcommittee on Interior, Environment, and Related Agencies has been a singular force in defining that Congressional intent.

This subcommittee controls the Interior Department's (and NPS') budget and has made her the most feared political force at PRNS. She's held all the cards and she has consistently used her authority to influence NPS policy. Even though NPS had "full discretion" as to whether ranches

¹⁰⁸ Kevin Bogardus and Jeremy Jacobs, "NATIONAL PARKS: Feinstein Lends Support to Ranchers on Calif. Seashore -- Tuesday, April 19, 2016 -- www.eenews.net," E&E News, April 19, 2016, <https://www.eenews.net/stories/1060035882>.

should have their lease extended or not--it was not the NPS making this call but Interior at first responding to Senator Feinstein and then gaining the full support of the President.

Just a few years earlier Senator Feinstein attached a rider¹⁰⁹ to an important Senate appropriations bill that would have given a \$3,200- a-year, no-bid 10-year lease worth about \$20 million dollars to PRNS rancher Kevin Lunny. Mr. Lunny had purchased the remaining eight years of the Johnson Oyster Farm Lease despite being notified by an NPS attorney that as the oyster farm was considered a nonconforming use in an area designated by Congress (after a multiyear process that included an EIS and public scoping process) as a potential wilderness area the NPS would not renew the lease and would remove the oyster farm at the termination of the lease to fulfill Congress' intent to designate the bay full wilderness area status.

Mr. Lunny went ahead and purchased the remaining years of the lease determined to fight and unleashed one of West Marin's most bitter feuds. That Senator Feinstein was willing to have staff literally spend years on this issue for a rancher (there were several qualified oyster growers in the area that would have sought that opportunity) in an area that Congress had already conducted an expensive public process demonstrates her power and interest in commercializing PRNS.

One would hope that the issues raised in this paper will encourage many of the policy-makers who have expressed full-throated support for ranching in the park to task their staff to examine the issues raised and to hold hearings with representatives of the myriad stakeholders this plan will impact beyond just the ranchers.

As research, quantitative data, and climate change bring these issues into even clearer focus over the coming years, history and public opinion will be the ultimate judge of their legacy on this issue. With a new administration preparing to assume office, Senator Feinstein, who inserted a rider into an appropriations bill citing Congressional support for ranching in PRNS that the NPS cites as a basis for their GMPA, will play a critical role in determining the park's future. But so will her colleagues who have the power to stand up and block any attempt to codify this decision while holding hearings to consider the future of ranching in PRNS.

¹⁰⁹ Dennis Rodoni, "Marin Voice: Huffman's Point Reyes Bill Protects Ranches, Environment – Marin Independent Journal," Marin Independent Journal, October 28, 2018, <https://www.marinij.com/2018/10/28/marin-voice-huffmans-point-reyes-bill-protects-ranches-environment/>.

Another important political figure is California's 2nd Congressional District Congressman, Jared Huffman, whose district surrounds the Federal park. In 2018, Congressman Huffman introduced precedent- setting legislation H.R. 6687. Excerpts from a May 2018 article in the *Point Reyes Light* are revealing as to what drove the legislation:

Three members of RAG (Resilient Agriculture Group) —Dr. Watt, conservationist Phyllis Faber and rancher Kevin Lunny—wrote a letter to this newspaper

{From the Letter}

"Both Representative Jared Huffman and Senator Dianne Feinstein are on record repeatedly as to their unwavering support for agricultural uses remaining a permanent part of the Point Reyes working landscape, consistent with Congress's original intent," they wrote. "It is incumbent upon them to now move from words of support to collaborative legislative action."

RAG has recently announced the hiring of the lobbyist John Doolittle, a former House Republican who came under investigation in the early 2000s for his business relations with lobbyist Jack Abramoff, the prominent lobbyist who defrauded numerous clients.

In a conversation with the Light, Rep. Huffman confirmed that he is open to a legislative solution. He said that he has worked on drafting legislative language in close collaboration with Sen. Feinstein.

In speaking with the Light, Rep. Huffman remained critical. "It's very important to me that I have an open dialogue and working relationship with the ranching community, and it's easier to do that when the community is unified," he said. "When there are splinter groups and offshoots that go out and engage in secret lobbying agendas, it can complicate things and it can undermine the trust that is so important for us all to work together."¹¹⁰

The article also described concerns expressed by some ranchers. As one put it, "I think it can be dangerous to take the RAG path and hire a disgraced, far-right former Congressman to lobby

¹¹⁰ Anna Guth, "House Committee Hears Point Reyes Woes," The Point Reyes Light, May 3, 2018, <https://www.ptreyeslight.com/article/house-committee-hears-point-reyes-woes>.

for you in Washington.”¹¹¹ However, looking at some of the groups the PRSRA worked with, such concerns seemed to fade away as new allies were brought to the fold and the dream of returning to Shafter era ranching became ever closer.

Possibly worried they might suffer the same fate as DBOC, the RAG members--which included Mr. Lunny-- urged their representatives to introduce legislation in the face of a NEPA process that included public review. Had it been successful, it would have eliminated any avenues of public redress.

"In recent weeks, RAG, a new group of advocates and ranchers, has called for legislation that will guide the general management plan amendment process by clarifying Congress's intent that the working ranches continue."¹¹²

Rep. Huffman and Senator Feinstein, as the article states, worked together to craft just such legislation.

It was the same approach used by Rep. Rob Bishop of Utah to eliminate legal challenges to the Trump Administration's 85% reduction of Utah's Bears Ears Monument that exposed the land to oil drilling and uranium mining. Rep. Bishop introduced legislation to codify the Trump Administrations' actions. And Huffman and Feinstein worked together to craft H.R. 6687 which would have codified not only extractive commercial use in a national park, but its primacy.

Huffman and Feinstein's bill was so extreme it received the enthusiastic support of some of the most ardent anti-environmentalists in the House. Rep. Rob Bishop enthusiastically co-sponsored it. Huffman told his colleagues in the House that the bill had the support of his constituents (a stance he still maintains today) and he told his constituents that the bill would not impact the ongoing public scoping process even though it would have codified most of the key issues being reviewed by the public.

The bill would have also codified the killing or removal of a native species (free-ranging Tule Elk) because they interfered with commercial interests. Huffman (and according to the *Light* article, Feinstein's) bill would have radically changed existing law and management practices in our national parks.

¹¹¹ Ibid.

¹¹² Ibid.

Commercial extractive industry (not concessionaires) would be further sanctioned, their operations would take precedence over native wildlife and resources that could be destroyed or otherwise removed if they interfered with the operations. And under the GMPA a visitor's right to visit these areas of the park could be limited or denied if they were deemed to interfere with commercial operations

The following link is to a 3-minute clip of the House Natural Resource, National Park Subcommittee Unanimous Consent procedure on H.R. 6687:

[https://www.youtube.com/watch?v=zXcEMlb6-ik&feature=youtu.be&ab_channel=SavePointReyesNationalSeashore.](https://www.youtube.com/watch?v=zXcEMlb6-ik&feature=youtu.be&ab_channel=SavePointReyesNationalSeashore)

Congressman Garrett Graves of LA was astonished and requested clarification at the precedent the Huffman Bill would set while Rob Bishop, UT-- who co-signed the bill at Huffman's request-- (they have two of the worst anti-environment records in Congress), responds affirmatively about a joke Graves makes about making sausage from the Elk:

{Rep. Graves} So this bill actually protects commercial operations in the confines of a national seashore and to the extent you may have species infringe on commercial operations, the species are relocated?

Actually, the bill also permits the NPS to use lethal methods. Killing the Tule Elk is in fact the method of removal NPS adopts in the GMPA.

Delighted with the answer, Congressman Graves congratulates Congressman Huffman for his bill and when Huffman offers him some Tule Elk in Louisiana Graves and Congressman Bishop joke about making sausage from the elk.¹¹³

Congressman Huffman has stated that he has read the history of the park and he believes that ranching was always meant to stay. Perhaps he has relied on Dr. Laura Watt's history or another one of the pro-ranching advocates. But as stated earlier, finite leases, then authority given to the Interior Secretary to issue 5-year leases only if they are compliant with the resource protection goals described in the 1978 amended Enabling Legislation and a statement By NPS in the Final EIS that that the leases are discretionary, there are no legal requirements for

¹¹³ Save Point Reyes National Seashore, *Hypocrisy at Home*, 2020, [https://www.youtube.com/watch?v=zXcEMlb6-ik&feature=youtu.be&ab_channel=SavePointReyesNationalSeashore.](https://www.youtube.com/watch?v=zXcEMlb6-ik&feature=youtu.be&ab_channel=SavePointReyesNationalSeashore)

the NPS to issues lease. It is clear that both Senator Feinstein and Rep. Huffman would like to change that by codifying ranching in perpetuity at Point Reyes, but to date they have not succeeded in passing such legislation.

Congressman Huffman's stance on PRNS runs contrary to many of the positions he has taken on other environmental issues such as California's Salton Sea where he tweeted this after chairing a September 24, 2020 hearing on the issue (refer to *Figure 18*):

"Yesterday, I chaired the first federal hearing on the Salton Sea in 23 years, and it was revealing. My democratic colleagues and I want the federal government to partner with the state to address the air, water and wildlife disaster that is unfolding there and diproportionately impacting communities of color. Our GOP colleague, Rep. Tom McClintock, couldn't care less. He used the hearing to spout the most specious theories of climate change denial, thumb his nose at environmental justice concerns and he even managed to mix in some classic Trumpist medical quackery by trivializing the pandemic and claiming that masks do nothing to prevent the spread of Covid."

Figure 18: Jared Huffman's post on September 24th 2020, regarding the Salton Sea.¹¹⁴



¹¹⁴ Jared Huffman, "Huffman's Comments on the Saltan Sea," Facebook, September 27, 2020, https://l.facebook.com/l.php?u=https%3A%2F%2Fwww.desertsun.com%2Fstory%2Fnews%2Fenvironment%2F2020%2F09%2F24%2Fcalifornia-democrats-lambast-federal-inaction-salton-sea-hearing%2F5854882002%2F&h=AT1YDb_s4f9ONQhIuzQpkvV4Wa2TvTzar2AcIs_-EYUrXtahcg5ALFFrGqQj6HPwV6EdkxodbTMFcXz_uymhSaHU9ohlxCSEFR9MRxi92OASjwXKdMzPzKA7wDexLr01RMY&s=1.

The voting records and public statements of both Rep. Bishop and Rep. McClintock who receive significant funding from the fossil fuel industry place them in the extreme right of anti-environmentalist, climate change deniers in Congress:

The Republican members of the House Natural Resources Committee spent their years in power undermining and dismantling our most important wildlife laws, including the Endangered Species Act. Just last year, Representative Bishop and his colleagues introduced a package of nine bills that, in effect, would have gutted the ESA.¹¹⁵

Both Rep. Rob Bishop, who co-sponsored Huffman's bill, and Rep. McClintock who Huffman calls out for being a climate change denier congratulated Rep. Huffman for introducing H.R. 6687. During the same committee hearing meeting on H.R. 6687, Rep McClintock and Rep. Bishop commend Rep. Huffman for "finding local solutions to complex problem which the local people agree is the answer."

As this paper has noted, the only local people at the table were the ranchers and the politicians. The public spoke out during the scoping process with over 91% opposing ranching and was ignored. The reason why they supported H.R. 6687 was clear in the video clip: it set a new precedent in favor of commercial interests over native wildlife on public lands that receive the highest level of protection. A "no brainer" gift to the far right which they enthusiastically embraced.

Much of which Rep. Huffman says about McClintock and the Salton Sea applies to Rep. Huffman and PRNS. He has been no less blatant in thumbing his nose at environmental issues, people of color and Environmental Justice in how he has used his power to support ranchers at PRNS. Since he clearly demonstrates in this tweet that he understands these issues, one is left to assume that in his own district, and when his own political self-interest is in play, he simply does not care.

He tries to evade responsibility when asked by constituents saying thing like "it's not my decision it's the NPS's" when in this instance NPS is merely a vessel carrying out policy being directed from above. He also said when he introduced H.R. 6687 that it "would not impact the ongoing public scoping process" when in fact it would have made it completely irrelevant.

¹¹⁵ Jimmy Tobias, "Republicans Aren't Just Climate Deniers. They Deny the Extinction Crisis, Too," *The Guardian*, May 23, 2019, sec. Opinion, <https://www.theguardian.com/commentisfree/2019/may/23/republicans-arent-just-climate-deniers-they-deny-the-extinction-crisis-too>.

The Ranchers in Politics

The ranchers have made common cause with and availed themselves of the services of nonprofits who promote deregulation and the commercialization of public lands. The Pacific Legal Foundation has been supported by funding from the Koch brothers and Cause of Action, which has also received Koch brothers funding, was used by Mr. Lunny for his DBOC legal challenge. With the death of David Koch, the Charles Koch foundation has stepped up spending millions to try and defund the Affordable Care Act during a pandemic. The same multi-billionaires who spent lavishly to deregulate government including a range of long-standing environmental laws like the Endangered Species Act fund organizations dedicated to the commercial use of public lands. PRNS, as public land that receives the highest level of protection would be a coup to essentially turn back into private hands.

And the same dark money that has funded the Heritage Foundation's effort to seat anti-regulation, anti-climate change, business friendly justices and has for years funded legal challenges against the ACA that may strip healthcare from millions of Americans, lift the ban on denying coverage for pre-existing conditions, and remove lifetime caps have also funded legal support to ranchers that are degrading the health benefits accruing from a national seashore.

For some ranchers to have balked at hiring, according to one ranchers description, "a disgraced, far-right former Congressman to lobby for you in Washington," but to have stayed silent as these groups, extremist anti-environmentalists in the House and a white Supremacist Donald Trump rallied to their cause should make one think about their assurance that they are "stewarding these lands in the public interest."

The County of Marin

The Marin County Board of Supervisors unanimously passed a resolution supporting the GMPA with one supervisor referring to the action as "a no brainer."

Prior to his support of the Resolution Supervisor Dennis Rodoni, who has authored op-eds in support of the ranchers and whose 4th District abuts PRNS, accepted an invitation to join the board of the Marin Agricultural Land Trust (MALT). MALT is one of the county's most strident advocates for ranching in PRNS. They also receive millions of dollars in taxpayer funds through a Marin County sales tax that has funded both the Marin County Parks Department and Malt. (How Supervisor Rodoni managed to deconflict his fiduciary responsibilities as a board member

of a private nonprofit that also receives taxpayer funding for which he also bears a fiduciary responsibility has been the subject of recent concern resulting in his stepping off the Board of MALT after it was disclosed MALT had overcharged the County of Marin some \$800,000 on an easement transaction due to a "process" error.

When a group of environmentalists sued the NPS over its failure to update its Management Plan, Supervisor Rodoni helped engineer an extraordinary pay out of up to \$200,000 of public funds to cover the ranches legal fees so that they could join the lawsuit.¹¹⁶

The county provided the reimbursement— officially defined as 20 percent of ranchers' legal fees, up to a \$200,000 cap.

Two groups of ranchers were being represented separately. One group hired a private international law firm, Arnold & Porter Kaye Scholer. Another cohort was being represented by Western Resources Legal Center.¹¹⁷

In addition, according to the article, county legal staff had also spent over a hundred hours on the case.

What made these actions extraordinary included:

- The PRNS Ranchers and their PRNS-based ranches (several also own ranches outside the park) operate on federal lands not subject to the jurisdiction of Marin County.
- "two years ago the county had allocated \$125,000 to help ranchers with the difficult impacts of the drought. But then rain fell, and the funds were never paid out."¹¹⁸
(How does the county make that assessment over schools., roads, nonprofits, underserved communities, hospitals and the myriad other needs in the county?)
- Some of the ranchers are multi-millionaires. Does the county consider this in offering legal support and public funds?
- "The county has since been discussing how the money should be spent, and ultimately decided to repurpose it for the ranchers' legal fees, with an extra infusion of \$75,000."¹¹⁹

¹¹⁶ Samantha Kimmey, "Ranchers Get Legal Funding from County," The Point Reyes Light, January 12, 2017, <https://www.ptreyeslight.com/article/ranchers-get-legal-funding-county>.

¹¹⁷ Ibid.

¹¹⁸ Ibid.

- Where did these funds come from? Was there a public review process?

The county provided approximately \$100,000 (according to the article the funds were split) to "Western Resources Legal Center". WRLS lists Point Reyes Ranchers Association and Lunny Ranch as two of its 2018 supporters.

According to its website this organizations mission is:

Our mission is to provide skills and training for law students seeking careers representing oil and gas interests, farmers, ranchers, timber companies, water users, mining companies, and other businesses that provide the natural resources and productive land uses on which modern life depends.¹²⁰

What an irony that Marin County (whose Countywide Plan claims to be focused on climate change) should use public funds to support such an organization so that it can safeguard the interests of a handful of ranchers in a national seashore whose activities are degrading and devaluing public health and our local economy and exacerbating climate change based on the findings presented in this report.

The justification teh County used was based on the assertion that any decrease in ranching in PRNS threatens policy in the Countywide Plan and the Local Coastal Program that support the continuation of agriculture.

The Countywide Plan reads like a patient who takes multiple drugs for addressing multiple symptoms without consulting experts on how those drugs might interact and produce negative or fatal outcomes. For instance, the county has adopted policies related to inclusion, equity, racial discrimination, underserved communities health and the environment.

If the document was merely aspirational, perhaps it would not be so alarming. But it is a planning document and the county used this to justify expending public funds. The Marin County Board of Supervisors passed a resolution that affirms equity and inclusion as priorities in the county and takes a stand against all forms of discrimination and intolerance.

¹¹⁹ Ibid.

¹²⁰ "WRLC Mission Statement," Western Resources Legal Center, 2019 2007, <https://www.wrlegal.org/about-us>.

"We will fight for the rights, freedoms and interests of all members of our community. What resonates most for me now is the power of community and the importance of acting locally to protect the values we cherish: community, acceptance, respect, integrity and compassion," Sears said. "So let's join hands and go forward with energy and engagement, working together to creatively solve problems and enrich the lives of everyone in our community."¹²¹

It appears that in developing the Marin County's Countrywide plan (CWP) ranchers were consulted, but the communities that will be most negatively impacted by ranching remaining in the park were not. In fact, there is no mention of the distinction of ranching in a national park and ranching in general. The platitudes describing ranching are just that: there is no serious analysis of the myriad issues that arise with food production. Nor is there analysis of why or how, in a National Seashore that serves some 2.4 million visitors a year it might be problematic or contrary to the laws and policies governing national parks and seashores.

The 2007 CWP claims it "integrates sustainability principles, addresses climate change, and links equity, economy, and the environment in its policies and programs." In fact there appears to be little in the way of integration as issues are siloed resulting in a plan riddled with inconsistencies. Issues involving underserved communities are related only to housing. Since the document does not even bifurcate lands being ranched in Marin with federal lands that enjoy much higher legal protections, there is no mention or analysis of what ranching in the park might do to visitation, the accessibility of the park and the impacts on these communities to enjoy the health benefits of visiting a park. The focus on economic and cultural values of ranching overemphasizes the brief 150-year extractive uses of white European settlers on these lands over the many thousands of year history of Indigenous Coast Miwok. By deemphasizing their considerably longer history stewarding these lands, the CWP distorts history and institutes barriers for these communities to feel welcomed on their aboriginal lands.

The CWP states: "Although agriculture is not technically considered a 'natural system,' most ranchers and farmers in Marin conduct agricultural activities in a manner compatible with the natural environment." Again, the report offers no basis for making such an assertion, except for its clear intent to state unqualified and unexamined support for agriculture.

¹²¹ Katrina Houck and Patch Staff, "Marin County Board Adopts Resolution on Equity, Inclusion," San Rafael, CA Patch, December 14, 2016, <https://patch.com/california/sanrafael/board-adopts-resolution-equity-inclusion>.

Photos attached to this report demonstrate anything but a system compatible with the natural environment as does the parks own EIS --especially on lands that are supposed to be managed to the highest standards of protection. Ranches at PRNS receive waivers allowing them to pollute. It claims it wants to address climate change, but says nothing about the well-documented impacts of methane on climate change and the urgent need to reexamine our current agricultural practices.¹²²

The CWP also states:

The 21st century in Marin will include a restored natural environment that supports a rich array of native plants and animals, and provides for human needs. Residents and visitors will enjoy clean air and water. Native habitat and essential corridors for wildlife movement and plant dispersal will be protected. Watershed function will improve with enhancements to water infiltration, preservation of stream-flow capacity and riparian vegetation, and restoration of stream corridors, marshlands, and other natural wetlands.

Where is the evidence of this commitment in these photos (all taken in 2020) of the ranched lands in PRNS that the County of Marin has not only supported but heavily subsidized? What process did they follow to cite the CWP as the basis for approving support to ranching when it clearly violates the stated priorities of the CWP within the most protected of public lands?

¹²² Henry Fountain, "Cutting Greenhouse Gases From Food Production Is Urgent, Scientists Say - The New York Times," The New York Times, November 5, 2020, <https://www.nytimes.com/2020/11/05/climate/climate-change-food-production.html>.

Figure 19: Coyote searching for food in a barren field.



Figure 20: Manure piles and veal huts.



Figure 21: Plowed fields at Abbott Lagoon.



Figure 22: Barren fields.



Figure 23: *Silage fields.*



Figure 24: *A massive modern milking shed built on a bluff directly over the Great Beach.*



Figure 25: 4 Bull Tule Elk who wandered on to ranch lands where they can be "aggressively hazed" or shot according to the GMPA.



The CWP fails to examine through a holistic, rigorous analysis how its various components meet its objectives and how they interrelate to other goals and aspirations.

While it claims to support "a restored natural environment that supports a rich array of native plants and animals" and clean air and water, the County of Marin relied on this CWP to justify funding anti-environment groups to help ranchers in PRNS continue to degrade the land areas of a national park that tens of thousands of Marin residents frequently visit.

The fact that the county has based funding and policy decisions regarding supporting and subsidizing and continuing ranching in PRNS based on a CWP and LCP that are so deficient is deeply troubling. With no economic analysis, no community impact evaluation or statement, no discussion or Bay Area wide-outreach to fairly analyze the impacts of maintaining ranching decisions were made that could negatively impact millions for generations to come.

There is one shared characteristic of everyone that has been deeply involved in this issue (including this author¹²³) the entire Marin County Board of Supervisors, every rancher, politician, local journalist, county official, ranch supporter, the key members of Congress driving the issue, NPS officials, lobbyists, lawyers, professors, Interior Officials, --and certainly those who actually have the power to effect change, we are all white.

Congressman Huffman, in the *Light* article referenced above, advises the ranchers and their supporters about the importance of having a united ranching community to work with--implying that will better assist him in delivering on what *they* all want.¹²⁴

It appears that not one of these policy-makers or their staff even considered reaching out to communities of color or to underserved communities to get their input on this decision. Nor have I read anything specific to PRNS around the topics raised in this paper that will negatively affect these communities. Rep. Huffman commented about environmental justice issues that were impacting people around the Salton Sea. But he is apparently unaware of the environmental justice issues in his own backyard.

And as discussed earlier in developing a culture of health, one of the hallmarks of both environmental and racial discrimination is denying meaningful participation in environmental decision-making and failing to recognize community or cultural differences. It is also an example of how systemic racism in our society occurs through brute force--when one demographic group uses its power and its privilege to advantage themselves while disadvantaging others. How else can you explain a group with a 150-year history on these lands being given the opportunity to break their agreements to end ranching, receive ever expanding leases and privileges on over 28,000 acres of land while a historically oppressed indigenous group with 10,000-years of history on these lands is given an acre of land and is essentially dismissed in this process?

¹²³The author has reached out to several of these communities to hear their concerns and intends to continue to expand this effort.

¹²⁴ Anna Guth, "House Committee Hears Point Reyes Woes," The Point Reyes Light, May 3, 2018, <https://www.ptreyeslight.com/article/house-committee-hears-point-reyes-woes>."

XI. The Taking of Point Reyes

For the many people who visit PRNS and ask "how could this happen in a National Seashore," there are four documents (all of which are attached sequentially in Appendix A-D of this report) that describe the "how." The first is the June 2, 2014 PRSRA letter¹²⁵ to PRNS Superintendent Cicely Muldoon, where the ranchers set out their Shafter era plan. The second is a 2016 letter from Dianne Feinstein to Secretary of the Interior Sally Jewell¹²⁶ urging the Secretary to implement the Shafter era plan reiterating (in some cases almost verbatim) the ranchers requests. The third is a letter from the NPS's Western Region director Laura Joss¹²⁷ who was tasked with the response (doubtless reviewed and approved by Interior). She acknowledges Congressional intent to maintain ranching at PRNS, assures her NPS will continue their support of ranching , reminds her that PRNS staff are in regular contact with both the ranchers and her staff regarding the GMPA and thanks Senator Feinstein for her continued support of *sustainable* (emphasis added) ranching at PRNS.

These letters demonstrate how the review and subsequent response to a court ordered settlement were predetermined and not based on the outcomes of an impartial environmental review (even though the ability of the Secretary of Interior to authorize leases is constrained by a requirement that they be consistent with existing natural resource protection laws governing the management of such resources in National Parks and in PRNS own amended enabling legislation:

§459c–6. Administration of property

shall be administered by the Secretary without impairment of its natural values, in a manner which provides for such recreational, educational, historic preservation, interpretation, and scientific research opportunities as are consistent with, based upon, and supportive of the maximum protection, restoration, and preservation of the natural environment within the area (Emphasis added.)

¹²⁵ Point Reyes Seashore Ranchers Association. "Re: Ranch Comprehensive Management Plan Environmental Assessment (EA)," June 2, 2014. <http://savedrakesbay.com/core/wp-content/uploads/2016/08/PRSRA-Scoping-Letter-with-attachments.pdf>. (See Appendix A)

¹²⁶ Diane Feinstein, "Official Correspondence from Senator Diane Feinstein to Secretary of the Interior Sally Jewell," March 18, 2016, https://www.eenews.net/assets/2016/04/19/document_gw_01.pdf. (See Appendix B)

¹²⁷ Laura E. Joss, "Official Letter from NPS Regional Director, Pacific West Region, Laura E. Joss to Senator Dianne Feinstein," April 7, 2016.

Ms. Joss never mentions awaiting the final environmental assessment nor does she refer to awaiting determination based on the results of analyzing adverse impacts including, economic, environmental, or the considerable issues at stake regarding equity, diversity, and environmental justice and health. There was no discussion about awaiting feedback from the various stakeholders highlighted in this paper, only a clear line of communication between PRNS staff (with oversight from Interior) , Senator Feinstein's staff and the ranchers.

This predetermined outcome calls into question the validity of the NEPA process (which continuously refers to the "desired outcome"--which is clearly the outcome agreed to in these two letters). In response to a question in the FEIS, the NPS asserts that it has discretion as to whether or not to authorize leases in the park. That is accurate. As the statute above defines the Secretary of the Interior's authority to issue leases is dependent on such lease being compliant with existing law regarding the protection of natural resources.

The issue of Congressional intent is doubtless clear in Senator Feinstein's mind. As the ranking member of the subcommittee on Interior Appropriations she has every reason to believe the Interior Department will respond favorably to her "urging" them to take specific actions. But her characterization of this intent being extent in 1962 is simply not accurate. And given the constraints on the Interior Secretary's authority to issue leases, the lack of codified Congressional law on the issue and the fact of the significant misinformation Senator Feinstein and Congressman Huffman have provided their colleagues "congressional intent" is at best undetermined.

The fourth element of this taking is described in an article in the *Point Reyes Light*¹²⁸ which includes the demands by a ranching advocacy group that legislation be pursued to codify their plan and protect it from a legal challenge. Ostensibly this is for the purpose of "clarifying Congress's intent that the working ranches continue."¹²⁹ But the legislation that Feinstein and Huffman work on does much more than that. As discussed in the previous section, It would codify the primacy of commercial operations in a national park over existing laws that mandate natural resource protection be the highest priority. This is what so excited Republicans who favor the commercialization of all public lands and earned their full-throated support for the

¹²⁸ Anna Guth, "House Committee Hears Point Reyes Woes," 2018. (See Appendix D)

¹²⁹ Ibid.

bill. The Secretary of the Interior's authority to issues leases would be unbound from existing laws that have guided the NPS since its establishment. It would set a precedent that doubtless would be tested in other parks under future administrations.

In the article Rep. Huffman describes how closely Senator Feinstein and he are working on legislation to preempt any challenges, and where Rep. Huffman counsels the ranchers on how to work together so he can give them what they want.

To further elucidate these points, consider the following elements of each of the 4 documents.

The PRSRA letter is where the ranchers lay out the Shafter era plan. It describes the considerable resources that went into its development:

This letter also incorporates facts and information from PRSRA consultants, including lawyers, historians, NEPA experts, scientists and other resource management agencies.¹³⁰

The letter, which contains numerous inaccurate as well as debatable points describes elements of the Shafter era plan that become the verbatim talking points used by Senator Feinstein and Congressman Huffman in their many public and official statements on this issue as in this letter from Senator Feinstein to Secretary of the Interior Jewell:

[D]iversification of crops and income is now more important than ever," Feinstein wrote. The upcoming NPS ranch management plan, she added, "should allow for some level of agricultural diversification ... including small-scale row crop farming, production of different livestock species, and allowance of agricultural processing and sales.

These are points that derive from that letter that are all incorporated in the GMPA. Senator Feinstein goes on to say:

¹³⁰ Point Reyes Seashore Ranchers Association. "Re: Ranch Comprehensive Management Plan Environmental Assessment (EA)," June 2, 2014. <http://savedrakesbay.com/core/wp-content/uploads/2016/08/PRSRA-Scoping-Letter-with-attachments.pdf>.

lawsuit, I firmly believe that multi-generational ranching and dairying is not only important both ecologically and economically for the area, but also entirely consistent with Congress's intent when it established Point Reyes National Seashore in 1962 and subsequently amended the Act in 1978.

Allowing for continued ranching was a part of the deal Congress struck when it first established Point Reyes National Seashore as a national park. As part of a deal to persuade landowners to sell their property to create the National Seashore in 1962, the federal government assured residents they could continue ranching. And Congress subsequently reaffirmed the importance of agriculture in 1978 when it established the permitting system that now governs the leases.¹ We must keep that promise.

This is a completely inaccurate rendering of facts and history.

To the first point, at least some of the considerable environmental impacts of ranching are documented in the EIS and many more in numerous expert opinions on the topic. This paper has addressed the economic loss the ranches create for the community and the region as well as their negative impact on public health. Moreover as to the history that Senator Feinstein and Representative Huffman promote: There was no deal struck in 1962 between the government and ranchers that created a legal basis for the continuation of ranching in a National Seashore (which at the time was nowhere near fully formed due to property acquisition issues.) In 1962 the ranchers refused to sell their properties and the government did not have enough money to buy all the properties identified in the new park so they simply delayed the issue for almost 10 years until funds were forthcoming. They then purchased the properties under terms that set a finite term of "reservations of use and occupancy." It was a similar deal that homeowners and other ranches in GGNRA received who were forced to vacate per the terms of the ROP. According to the NPS's own history of the park, the 1962 Enabling Act (EA) did not provide any legal commitment to ranching continuing in a park that at the time the EA was signed existed only on paper:

The specific language in the founding act, Public Law 87-657, which states that the government may not acquire land in the pastoral zone without the consent of the owner, **"so long as it remains in its natural state, or is used exclusively for ranching and dairying purposes," was in no way a mandate for the NPS to continue agricultural activity at Point Reyes.**(Emphasis added). That language

described the terms by which a rancher would be allowed to maintain property ownership. In other words, if the rancher wanted to keep title to their property for a designated period of time, they had to keep the land in its traditional agricultural operations; otherwise the government could condemn the property in order to ensure that the NPS remained in control of the land. The point was to keep other inappropriate land uses—subdivisions, apartment buildings, Ferris wheels, and the like—from appearing in the center of a national seashore.

The authorizing act did not mandate the ranch owners, or the NPS, to keep the land in agricultural use; they did want to maintain undeveloped open space, the pastoral scene, and rights of the original property owners. **Many NPS officials and members of Congress assumed that once the government purchased the land in the pastoral zone, it would eventually be allowed to return to its natural state, as that term was then understood.(Emphasis added)**¹³¹

Senator Feinstein's letter claimed:

These operations are not only an important cultural and economic underpinning in the area, they also sustain a healthy and well-balanced ecosystem. Sound, sustainable farming practices help with—not hinder—the management of vast grasslands under threat from non-native plants.



invasive shallow-rooted plants



a coyote searches for food on a barren field

¹³¹ Sadin, Paul. *Managing a Land in Motion: An Administrative History of Point Reyes National Seashore*. pg. 177 Historical Research Associates, Inc. 1904 Third Avenue, Suite 240 Seattle, Washington 98101, 2007. https://www.nps.gov/parkhistory/online_books/pore/admin.pdf.

Another gross inaccuracy as the photos above reveal. Ranching has introduced invasive species which the ranchers claim cows are now needed to suppress. This report describes successful restoration efforts. Ranchers have claimed the pastoral zone would be impossible to restore.

Sustainable ranching in the Seashore also provides an excellent opportunity to educate the millions of visitors who come visit each year. In these unique working landscapes, visitors can witness for themselves how locally-produced food reduces greenhouse gas emissions by reducing the distance traveled from farm to table.

One half of Marin County's landmass and perhaps even more in Sonoma are in agriculture. There are endless opportunities for visitors to experience ranching and farming in the Bay Area through farm stays, food tours and other programs. Many of these tours are conducted on ranches that are just as historic and are just outside the park on the East shore of Tomales Bay.

¹³²PRNS is the only National Seashore on the Pacific Coast.



To suggest that ranching in a National Park helps combat climate change is not accurate. From the NPS EIS: ¹³³

¹³² <https://foodandfarmtours.com/>

¹³³ Point Reyes National Seashore et al., *General Management Plan Amendment Final Environmental Impact Statement*, 107.

**TABLE 12: ANNUAL EMISSIONS FROM RANCHING AND MOBILE
SOURCES UNDER EXISTING CONDITIONS (TONS/YEAR)**

Activity	NH₃	VOC	PM_{2.5}	CO₂-Equivalent (metric tons per year)
Ranching/Livestock Emissions	104.9	46.9	0.671	24,601
Mobile Source Emissions*	0.27	0.56	1.6 (including dust)	3,734

Activities associated with ranching would continue to emit criteria pollutants and greenhouse gases associated with cattle grazing, manure management on dairies, fugitive dust, and mobile source emissions.

The GHG emissions from livestock under Alternative B would represent approximately 21% of agricultural sector emissions in Marin County and 5.7% of the total county emissions.

The NPS Regional Director for the West Coast Region, Laura E. Joss was tasked to respond to this letter. Her response is devoid of any suggestion that there will be any result other than the one Feinstein has "urged." As is standard bureaucratic practice in any U.S. government agency when dealing with high profile or sensitive issues it would have been sent to Interior for review and clearance as it was a response to an official request being made by a Senator with tremendous influence over Interior and NPS's budgets who has for years weighed in on issues at this park. This is where NPS's "Alternative B" was determined. Not by the extensive NEPA process or the thousands of citizens who spent countless hours providing earnest comments as part of the public scoping process which the NPS pointed out was not "a popularity contest." The decision was made based on a series of false premises created by a team assembled by the ranchers to reach out to their most reliable Congressional allies. These two letters formed the basis of the "desired outcome" referenced throughout the FEIS.

The partnership between the National Park Service and the park ranchers to preserve the vibrant ranching and dairying tradition at Point Reyes National Seashore and adjacent park lands has endured for more than 50 years. Point Reyes National Seashore staff today is proud to work together with the children and grandchildren of those ranching families who sold their lands to the National Park Service decades ago. We are committed to honoring Congress' intent regarding these beef and dairy ranches when it passed and updated Point Reyes National Seashore's enabling legislation, and intend to honor existing ranching and dairy authorizations.

The National Park Service believes that the Ranch Comprehensive Management Plan under development will strengthen both the historic working ranches and the superlative natural and cultural resources of Point Reyes National Seashore. The process is well underway, and we anticipate release of the plan for public review in late 2016. Point Reyes staff has met with your staff throughout this planning process, and will be pleased to continue to keep you and your staff updated as the plan progresses.

At the end of Senator's Feinstein's letter to the Interior Secretary expressing her series of false assertions she closes with this quote:

I would like to close with a quote from the National Park Service's General Management Plan of 1980: "There is no better place for man to contemplate his origins, the factors that sustain him, and the threats that may destroy him, than at the edge of the sea." I am now more convinced than ever that this national treasure and its lessons should be preserved for our children.

What are the lessons that children and future generations will learn from this as they face the unprecedented and existential challenges ahead? That 99 colleagues of Senator Feinstein and 434 of Representative Huffman supported this taking of a National Seashore because they failed to learn what the broader implications might be and to listen to the communities that would be most impacted? Our systems of checks and balances often becomes short-circuited in Congress when a determined, and immensely influential, politician such as Senator Feinstein is determined to get their way on an issue that is seen as local. Other politicians, even if they disagree, may choose not to oppose because they don't want to expend political capital and/or they may need that person's support to legislate on their own local issue. That's our system.

As Swedish activist Greta Thunberg so clearly observed this has terrible societal costs given the reality we now face:

And yet there are the Australia wildfires, the California wildfires, severe climate events all there for us to see. Is it that even more individuals have to experience cataclysmic events in order for them to take the climate crisis more seriously? Many people say that. They say it's not until it's burning in our own backyard that we will start to act. But that's not true. If you look at Australia, did they change? No. Look at California. Did they change? No. We have lost contact with nature so much that even when it's burning right in front of us, we don't care. We care more about this social system, this political system that we've built up.¹³⁴

¹³⁴ David Marchese, "Greta Thunberg Hears Your Excuses. She Is Not Impressed.," *The New York Times*, November 2, 2020, sec. Magazine, <https://www.nytimes.com/interactive/2020/11/02/magazine/greta-thunberg-interview.html>.

What is occurring is a systemic failure of government. This is a case study in how imbedded white privilege in one small very wealthy and very white county sanctions and sustains systemic racial and economic injustice. While everyone who visits the park will suffer, people of color and underserved communities will suffer the most. There may be no other options available to many in these underserved communities in the Bay Area or along the entire coast of California to experience a national park with an area like Yellowstone's Lamar Valley--but with the added maritime wonder of the Pacific Ocean, Tomales Bay and all their marine life. It could only happen at PRNS. People of color will be less likely to feel welcomed at a park that is more white person's ranch than park. And the end results for both these communities will be more pressure applied to the grip of gross inequity.

XII. Conclusion: Through the Looking Glass—The Future of the Point Reyes National Seashore

This moment and the movement it has inspired is about making the choice to confront the uncomfortable truths about a continuing legacy of systemic racism, implicit bias and racial and cultural division within our social, economic and political systems. The commission is committed to being part of this conversation, to not only giving voice but taking responsibility to act in our service to the public.

Steve Padilla Chair, California Coastal Commission

It is a terrible irony that a park whose founders envisioned would become one of the crown jewels in the national park system while at the same time--due to its proximity to a major urban area-- be an opportunity to begin to redress environmental and social discrimination against people of color and underserved communities should--through a pernicious display of white privilege--itself be degraded and restricted. And it is a terrible indictment of our political system that as climate change driven fires burn four million acres in California's fifth consecutive year of unprecedented fire and smoke, as our kelp forests are dying and the coast is experiencing a dramatic loss in species and as the worst pandemic in over a hundred years has already claimed 250,000 American lives our politicians have decided that the financial

interests of a handful of ranchers should be supported over the overwhelming public need for a park of this unique character at a time of unprecedented crisis.

For the past eight years I have examined the global humanitarian response system and how we can better adapt elements of the system to meet the intensifying impacts from climate change. At its core it is simply a study about systems and people--particularly the world's most vulnerable who with diminished resources and coping skills are the most at risk. There's no question that ranching in Point Reyes contributes to climate change and the park's EIS acknowledge this in its attribution of the methane produced from cows. The time is running out to address the root causes of climate change. But we are also on the clock for developing strategies to prepare ourselves to become more resilient in the face of coming challenges. It's as if a train is bearing down on us and we are frozen like a deer in the headlights on the track.

The international and domestic disaster response community spent decades preparing for not an if, but a when a global pandemic would emerge. We built early warning systems like the World Health Organization's GORAN and the United States Agency for International Development's PREDICT; we created the National Strategic Stockpile to have masks gloves and other Personnel Protective Equipment ready to distribute to states around the country and we developed planning roadmaps to detail the critical steps in the early day weeks and months of a pandemic.

When SARS CoV2 arrived, it caught us flat-footed. Our early warning systems had been defunded or degraded. Much of the inventory in the National Strategic Stockpile had been used and not replenished. And much of the planning was largely disregarded.

We suffered from our systems breaking down; and we certainly suffered from a lack of clear, competent and courageous leadership. But we also suffered from a failure of imagination as to just how challenging and complex a global pandemic would prove to effective response.

The politicians who have turned Point Reyes into what it is today are suffering a similar failure of imagination. In fulfilling the rancher's dreams of returning the pastoral zone to the Shafter-era of 150 years ago they are reinstituting the very barriers that a culture of health is meant to overcome: inequality, environmental degradation and a lack of diversity.

Such an approach ignores the reality around us and the invaluable opportunity we have to take steps now that will create far greater returns for all the people of the Bay Area and beyond by

restoring PRNS so that it maximizes its potential as a critical element in the region's and nation's Community of Health.

California's future is one that will be challenged as never before by water (mostly the lack of it) fire, economic instability, sea level rise, salinization, even greater inequity and migration at historic levels. And there will be disasters that we don't yet have the ability to predict. We are at the beginning phase of climate change driven events that will radically alter life on this planet.

Research has shown that the cumulative impact of multiple disasters reduces a person's coping abilities.¹³⁵ By refocusing our parks as places managed to foster mental health resilience we can help better prepare all Americans to withstand these oncoming disasters. To make such an effort relevant to all Americans the nexus between environmental justice, poverty, race, social equity and health must be addressed by making our parks more welcoming to these communities through outreach and targeted programs.

The inspiring quote above from the California Coastal Commission's Chair Steve Padilla was written about the Black Lives Matter Movement, but it also speaks to the need of society, and the structures that govern it, to put principles and results ahead of rhetoric and to never waiver from serving the common good.

California, for the foreseeable future, will be the epicenter of climate change in the United States. The mental health challenges we are currently facing with both unprecedented fires and Covid-19 are staggering. They will almost certainly grow even worse in the coming years.

Once ranches are removed, it would take at least a decade to restore Point Reyes based on the timeline of other such efforts. President Trump was wrong, it's not getting colder. In 30 short years the impacts to the planet, and to the world's most vulnerable, will be almost unfathomable. The decision to restore Point Reyes, to work harder to make it a more welcoming and a more inspiring national seashore and to make it truly integrate into region's

¹³⁵ Chas Danner, "California's Disaster Overload: Wildfires, Hazardous Air, and COVID-19" *New York Inteligencer* Aug. 24, 2020

community of health will pay dividends in the many billions of dollars for community health particularly mental health.

Policy makers who fail to educate themselves on the research, to conduct a comprehensive economic analysis, to consult with scientists, with mental health professionals and with the communities that will be most impacted are doing a terrible disservice to their constituents and to the broader community. Our National Parks are not only places for enjoyment, inspiration and health-- they are places people need to find temporary refuge from the current and coming storm.

The perilous situation we now find ourselves in and the good that can come of restoring Point Reyes National Seashore calls for us after 58 years to heed the words of Conrad Wirth, the man who first recognized that this geologically contrarian peninsula was indeed greater than the sum of its parts. **We** are the "generations hence" in "great need of this breathing spot."

Acknowledgements:

The author would like to thank Kat Despain for her generous, and extremely helpful, contribution in formatting this document and assembling various elements including the Table of Contents, Appendix and Bibliography.

Appendix A

Point Reyes Seashore Ranchers Association 15020 Sir Francis Drake Blvd.
Inverness, CA 94937

Hand delivered

June 2, 2014

Cicely A. Muldoon, Superintendent

Point Reyes National Seashore One Bear
Valley Road

Point Reyes Station, CA 94956

Re: Ranch Comprehensive Management Plan Environmental Assessment (EA)

Dear Superintendent Muldoon,

The Point Reyes Seashore Ranchers Association (PRSRA) appreciates the opportunity to comment on the Ranch Comprehensive Management Plan (CMP) during the current public scoping period.

I. INTRODUCTION

Ranching and farming families have been the stewards of the beautiful lands and waters of the Point Reyes peninsula and surrounding rangelands for many generations. It has been widely recognized that because of the careful management by these families, these cultural and natural resources were preserved. As ranchers know well, we must take very good care of the land we love so that it will remain productive for future generations. In the 1950s and 1960s, Congress recognized that this land and water preserved by these enduring, committed families should be protected into the future---not protected from the long standing land stewards and their historic businesses, but protected from new development. Congress created the Point Reyes National Seashore (PRNS or seashore) to protect not only the natural resources, but also the agriculture, mariculture and fisheries that had shaped the landscapes for the previous century. The relationship to the land of the historic families who had been caring for the land for previous generations was also to be protected.

The members of the PRSRA provide a number of important environmental, educational and economic benefits to the area. Ranchers have had most of the agricultural land within the seashore certified organic. Ranchers work closely with the Marin County Resource Conservation District (MRCD) and the Natural Resources Conservation Service (NRCS) to adopt new conservation practices and implement on the ground projects to protect and improve natural resources. Most of these beneficial projects come by choice, and at the financial expense of the historic rancher or farmer. PRSRA members provide exceptional educational opportunities. Members of PRSRA partner with other organizations and agencies to help inform the public about the benefits of family farming. One PRSRA member, the Drakes Bay Oyster Farm, provides on-farm educational opportunities for schools, organizations and roughly

50,000 members of the visiting public annually. PRSRA members produce over 20% of Marin County's agricultural products, generally, and more than half of Marin County's oysters, specifically. The land in the Olema Valley and Point Reyes Historic Ranch Districts constitutes approximately 25% of the land available for agriculture in Marin County today. The ranchers within the project area provide a significant number of jobs as well as affordable housing for their employees. The milk, beef and other farm products flowing into our local region provide more economic opportunities for the region through distribution, retail and restaurants featuring local farm products.

Over the past 50 years, since the creation of PRNS, National Park Service (NPS) managers and staff have continually come and gone. Each time new NPS staff arrive at PRNS to regulate the ranching and farming activities, the seashore ranchers provide the necessary education and background for them to begin to understand the historic operations. Only on very rare occasions have we ranchers seen any NPS staff with any background or education in agriculture – and we have seen hundreds of NPS officials and employees pass through PRNS. For longer than anyone at the NPS, the seashore ranchers have known the seashore's history, and have known and cared for both the natural resources and the local community and the people in the county we serve. The current staff at PRNS, together with the contractors they have hired and the experts with whom the PRNS will consult with during this EA should listen carefully and give special importance to the comments by the most experienced PRNS land managers, the Point Reyes Seashore Ranchers.

PRSRA represents and supports all ranchers and farmers in the project area. This scoping letter has been written by the historic ranchers with collaborative conservation in mind. PRSRA has taken this EA very seriously. PRSRA has had several membership meetings over the past month to work on our scoping comments. This letter reflects hundreds of suggestions and edits from the affected ranchers. Almost every rancher was engaged in the development of these scoping comments and almost every rancher has signed this letter. This letter also incorporates facts and information from PRSRA consultants, including lawyers, historians, NEPA experts, scientists and other resource management agencies. The purpose of PRSRA is to work with PRNS to achieve a relationship that protects both the ranchers' livelihoods as well as the natural resources. PRSRA believes these goals are not mutually exclusive, but, in the case of the project area, both are required to achieve either goal.

Many of the Special Use Permits (SUP) traditionally issued to the historic ranchers and farmers within the seashore have expired and have not been renewed. PRSRA does not concur with NPS that issuing 20-year permits as directed by the Secretary of the Interior would require an EA pursuant to the National Environmental Policy Act (NEPA). Furthermore, PRSRA does not agree that a new EA is required to allow PRNS to employ the tools already authorized in a previous EA and management plan to remove the elk from the ranchlands. Nevertheless, because PRNS decided that an EA would be undertaken, PRSRA will participate in the NEPA process as the most experienced and most affected stakeholder.

PRNS is a unit of the national park system and PRNS is a "National Seashore", not a "National Park." PRSRA asks that all EA documents, publications and communications be corrected.

Currently, there are many references to "park" or "park resources." These should be changed to "seashore" or "seashore resources." This error, if not corrected, could cause the public and consultants to apply the wrong standards to this environmental review.

PRSRA is the voice of the ranchers in the seashore. The undersigned members of PRSRA ask that during this Ranch CMP EA and into the future after this process is complete, PRNS and its contractors communicate with the ranchers through PRSRA on any regional issue – any issue that is not absolutely specific to one ranch. PRSRA as a group is conversant in most, if not all issues affecting multiple ranchers whereas individual ranchers may not be.

II. THE PURPOSE AND NEED AND OBJECTIVES SHOULD BE MODIFIED

a. Purpose & Need

A need for action should be limited to new activities, with new federal action required, with the potential for effects on the human environment. The NPS clearly states that this EA is to “Identify collaborative management opportunities that promote protection of Shafter era ranching.” In order to properly state this clearly, one of the needs that should be amended now reads: “To provide clear guidance and streamline processes for park and regulatory review of proposed ranching activities, including best management practices that promote protection of park resources.” PRSRA suggests that this need should be re-stated as: “To provide clear guidance and streamline processes for PRNS and regulatory review of proposed **new** ranching activities consistent with Shafter era ranching and farming activities, including best management practices that promote the addition of culturally appropriate agricultural practices and promote protection of seashore resources.” (See PRSRA legal analysis, attachments A and B)

b. Plan Objectives

The plan objective: “Clarify NPS expectations and rancher commitments to ensure consistency of agricultural lease/permits” should be amended. PRSRA believes a more collaborative approach to ensure consistency would improve this objective. PRSRA suggests changing this objective to: “Clarify NPS and Ranchers’ expectations and commitments to ensure consistency of agricultural lease/permits.”

The plan objective: “Identify and evaluate activities that provide operational flexibility to support long-term dairy and beef cattle operations in a manner consistent with the protection of park resources” should be amended. This narrow view of only providing operational flexibility to a dairy and beef ranching monoculture misses the true objective of supporting, encouraging and celebrating the truly diversified and dynamic Shafter era agriculture. PRSRA suggests that this objective should be re-written as: “Identify and evaluate activities that provide operational flexibility to support the dairy and beef cattle operations as well as the diversified agricultural activities that were present during the Shafter era in a manner consistent with the protection of seashore resources and World Heritage Site management principles that recognize ‘continuing landscapes.’”

NEPA requires an agency to review the effects of its federal action on the whole human environment, not just the effects its action may have on the natural environment. The viability of the ranchers is part of the human environment that this CMP must consider. PRSRA suggests another plan objective: “To create a plan that will allow current practices to continue, allow for long term leases/permits, allow for the addition of new practices consistent with Shafter era agriculture and to ensure ranchers’ financial viability in a manner consistent with the protection of seashore resources.”

Certain seashore ranch lands have recently been taken out of agricultural production, completely changing the land use and its intensity of use, without any environmental review or public process. In some cases, historic families have been displaced. PRSRA asks that one more plan objective be added: “Restore agricultural activities in the Olema Valley and Point Reyes Historic Ranch Districts where they historically existed and are not otherwise prohibited by law or are no longer agriculturally viable in areas where grasslands were replaced by dense brush or forest long ago.” This EA should consider the benefits of having PRSRA members---familiar with these rangelands--involved in the decision-making about which areas are agriculturally viable and which are not.

III. THE APPROPRIATE ENVIRONMENTAL BASELINE

Ranching and farming activities have been present in the subject area for at least 150 years. During the cultural period focused upon in this assessment, the Shafter era, an extremely diversified agricultural network existed. During this period there were thousands of acres in crop production, a myriad of livestock species being raised,

oysters being harvested, processing facilities for milk, cheese, butter, meat and crops and spring forages were being harvested and stored for winter livestock feeding.

The current baseline looks very similar to what has existed for 150 years, with a few exceptions. Today most of those activities are permitted by PRNS on some ranches, but not all. If an activity is currently allowed, it should be part of the current environmental baseline. For example, the current baseline includes dairy and beef operations, storage of on-farm harvested forage for livestock feeding, small scale row crops, poultry raising, oyster farming, bed and breakfast operations, on-farm sales of products raised in the seashore, horse boarding and onfarm tours and interpretation. Allowing all ranchers the same authorizations to undertake activities that PRNS already allows for some ranchers should not require an EA. Only new activities, not a part of the current baseline, should be the subject of this EA.

Tule elk were extirpated from the subject area by the 1860s. Tule elk were not present during the Shafter era. Tule elk were not present when Congress entrusted the NPS to protect the seashore, the ranches and farms and the people on the ranches and farms. Only a few years ago, NPS decided to re-introduce tule elk to the 18,000 acre designated elk range located entirely within the Limantour wilderness area. By this time (1998), it was well known that introduced tule elk in an area without predators could become highly invasive. The current elk management plan reassured seashore ranchers at the time that the ranch lands would be protected because the plan stated that the elk would not negatively affect any other permitted use (long-standing ranch SUPs) and the plan included tools to manage elk overpopulation, including contraception, relocation and culling. For some years, PRNS interpreted the plan just as the ranchers interpret it and kept the elk off of the ranch lands.¹³⁶ The Seashore's 2001 *"Year in Review"* (attachment D) acknowledged the need to "carefully monitor" to keep the elk outside the pastoral zone, to prevent their interfering with the cattle ranches and to ensure that the elk "are not shedding the organism that causes Johnne's disease." Nevertheless, beginning in about 2002, the park stopped actively managing the elk. Efforts to keep the elk out of the pastoral zone ceased. Under these circumstances, the development of a herd of tule elk in the pastoral zone must be recognized as a temporary condition and not taken into account in establishing the baseline for environmental review of a ranch management plan.

For 150 years there were no tule elk damaging ranchers' rangelands and livelihoods.

Assurances were given that there would be no conflicts. The new change in PRNS management of the invasive species PRNS reintroduced has led to the recent elk devastation resulting in the current elk emergency. Elk and cattle cannot coexist as was implicitly recognized in the current plan by its provision of tools and assurances. Elk do not belong in the pastoral zone and their current existence should be temporary. A recent lack of management should not change the true and honest environmental baseline.

The environmental baseline for this EA should include all of the ranching, farming, interpretive, visitor serving and retail activities that exist today, without tule elk.

IV. IMPACT TOPICS THAT SHOULD BE ADDRESSED BY THIS EA

It is crucial that the EA provide an objective, fair and thorough analysis of the positive effects of the agricultural operations situated within the project area. These ranches and farms not only preserve for the public the cultural heritage of the working landscapes of the project area, they do much more. This EA must evaluate the ecosystem

¹³⁶ PRNS 2001 A year in Review

services provided by the grazing livestock as well as the environmental, educational, economic and scientific contributions made by these historic family farms.

1) Ranch Operations / Activities

a) Review of permit structure

- i) Historically and currently, PRNS has issued SUPs to ranch operators for terms from five to twenty years. The November, 2012 memorandum from the Secretary of the Interior directed the NPS to consider offering 20 year leases/permits to all ranchers.

As PRNS has already offered 20 year agreements to some ranchers without a formal NEPA process, PRSRA believes PRNS could similarly offer 20 year leases/permits to all ranchers without initiating the current EA. However, because PRNS included the review of permit structure as an issue to cover in this EA, PRSRA will provide some guidance for the process. This EA should fully evaluate the concept of a 20 year “rolling renewal” agreement. In this type of agreement, at the end of each year the lease is automatically renewed for the length of the initial 20 year term, unless either the landowner or the farmer decides that the current term will be last term. In this way, the parties can continuously capture the benefits of a long term lease. The benefits include:

- (1) More commitment by the rancher to invest in infrastructure and repairs;
- (2) Improved public enjoyment of the seashore because ranches would more likely be maintained better;
- (3) More likely that banks will offer loans to the rancher;
- (4) More likely that ranchers will invest in long term rangeland improvements;
- (5) More likely that ranchers will invest in resource conservation projects;
- (6) More rancher eligibility for resource conservation project grants;
- (7) Reduced NPS staff time and paperwork;
- (8) Reduced rancher stress as permits near expiration;
- (9) Facilitated meeting of project objectives into the future;
- (10) Creation of more public trust that NPS actually does support the long term continuation of ranching and farming in the project area; and
- (11) Increased security and incentive for the next generation ranchers within the project area to continue the family farming tradition.

This appears to be a perfect place and opportunity to utilize a rolling renewal agreement because the park has respected the relationship of the families with the land as part of the cultural landscape, and the leases/permits have never been put to public bid and have always been renewed with the historic families that pre-existed the seashore. A process that would allow the parties to meet every five years to review compliance with conditions, amendments and lease/permit payment rates should be evaluated to support the mutual benefit of a rolling renewal agreement. The NPS and the public would be protected from a failure to comply with permit requirements, just as they are protected today. Currently, the PRNS imposes a 30day cancellation clause for any rancher not complying with lease/permit conditions, a form of landowner protection that could also be included in a new rolling renewal agreement. PRSRA recognizes the fact that the mutual benefits of a rolling renewal agreement far outweigh any imagined negatives.

Rolling renewal agreements have already been recognized by Congress as a valuable concept and tool to preserve agriculture. The Williamson Act is a perfect example of how a commitment to the long-term continuation of agriculture can be accomplished through rolling renewals.

This EA should evaluate the benefits of a creating and contracting with a third party non-profit with a board consisting of local agriculturalists, local range managers who regularly work with seashore ranchers, and agency representatives to manage the day-to-day administration of the range management plan as an NPS partner. Board members would be familiar with agricultural practices in the Marin and Sonoma foodsheds and with the culture, climate, soil and market conditions that impact the ranches in the seashore.

This model is consistent with NPS policies supporting local community involvement and with the UNESCO principles for World Heritage Site cultural landscapes. It is particularly appropriate for "working" or "continuing" landscapes, which are often part of larger communities. The Cuyahoga Valley Rural Initiative serves as precedent.¹³⁷ In that instance, NPS entered into an agreement with a non-profit to manage all agricultural lands and leases within this unit. PRSRA believes that this model should be analyzed as a solution for the project area. The benefits could include:

- (1) Improved relationship and trust between parties;
- (2) Day-to-day oversight provided by individuals with experience in dealing with local conditions in an agricultural community recognized nationally and internationally as a leader in sustainable and ecologically sound agricultural practices;
- (3) More continuity, as members of the non-profit will likely have less turnover than PRNS staff;
- (4) Community involvement with the future of food production in the project area; and
- (5) Reinforced public commitment to continue viable agriculture in the project area in perpetuity.

ii) Specifically, this EA should evaluate the alternative that the new long term leasing regulations could be modeled on Cuyahoga Valley National Park's "Countryside Initiative." Lessees would be supported in the continued adoption of farming practices considered to be ecologically sustainable, including organic and carbonbeneficial practices if requested by the rancher. In order to encourage a sustainable combination of agricultural land uses, a diversity of food and fiber crops could be allowed. With Cuyahoga as precedent, the NPS could lease the land directly to the ranchers and enter into a Cooperation Agreement for day-to-day ranch management by a nonprofit partner, whose board could include farm advisors and other Marin ranchers. In the case of Cuyahoga, the non-profit partner:

- (1) . . . provides technical information and guidance on sustainable agriculture, helps prioritize rehabilitation of farm properties, recruits and evaluates prospective farm lessees, and will evaluate and monitor each farm's annual operation plan.

b) World Heritage Site Status. The Point Reyes and Olema Valley Historic Ranch

¹³⁷ www.nps.gov/cuva/historyculture/the-countryside-initiative.htm

Districts, located within Point Reyes National Seashore, are eligible for listing on the National Register of Historic Places. This EA should evaluate the nomination of these historic Ranch Districts for World Heritage Site status. PRSRA believes that NPS can nominate these ranch districts for World Heritage Site Status and that this status would further the plan objective of preserving ranching and farming in the project area in perpetuity. In the meantime, with Cuyahoga as precedent, NPS could and should manage the lands consistent with World Heritage Site principles for managing “continuing” cultural landscapes.

This EA should also consider the effects on the human environment by evaluating compensation, perhaps via rent reduction, for ecosystem services provided by ranchers. If a rancher, with NPS approval, voluntarily goes above and beyond what is required by agreement for resource conservation, a monetary value can be attached to those services. The ranchers can be reimbursed through credits toward rent. This concept has been used by land managers in other situations. PRSRA believes that this concept could be useful to build collaboration between ranchers and PRNS to further the natural resource conservation and greenhouse gas (GHG) reduction goals of PRNS.

c) Operational Flexibility

i) Currently, PRNS has allowed operational flexibility unequally. PRSRA submits that conditions should be similar for all lease/permit holders. PRSRA believes that PRNS could allow for all what it has allowed for some without a NEPA process. However, because PRNS decided to initiate this CMP EA, PRSRA will provide comments to help inform and requests review by the process.

(1) Uniformity – all ranchers should be treated equally

- (a) Same conditions
- (b) Same duration
- (c) Same authorizations

(2) The following operational flexibility has been allowed for some ranchers without any NEPA process and should be allowed for all ranchers without a NEPA process.

- (a) Harvest and storage of on-farm planted and volunteer forage for feeding livestock during times of the year when little forage is available on ranch rangelands. This normal farm practice of tilling, planting and fertilizing most likely occurred on every ranch during the Shafter era and still occurs as a permitted use on several seashore ranches. Traditionally and currently, harvested forage is stored on-farm as dry hay, silage and haylage. It is well known that in the project area most native coastal prairie grassland plant species have been replaced by non-native species, due to factors such as 150 years of active ranching, farming, planting of non-native annual and perennial pasture species, and accidental introduction of other non-native species brought in with livestock feed. Continuing the historic practice of storing feed will not likely result in a further loss of native plant species; rather, the opposite more likely could occur. Forage planting, on what has been determined as highly erodible soil, can be limited to no-till practices. There are many resource and economic benefits of allowing this historic practice to continue and it should be allowed on every ranch instead of only a few selective ranches. It is critical that the rancher or farmer be allowed to harvest forages when the plants are at the proper growth stage. Harvesting either too early or too late results in a dramatic loss in feed value. Restricting harvest timing would be a change to the environmental baseline and the adverse effects of such restrictions should be analyzed in this EA.

Harvesting and storage benefits include:

- (i) Represent the true cultural heritage of the Shafter era ranching through the present time;
- (ii) Are already permitted uses within the seashore;
- (iii) Can be used effectively as range management tools to reduce nonnative, invasive plants;
- (iv) Have been shown to be effective management tools to control and reduce the highly invasive velvet grass (*hulcus lanadis*);
- (v) Reduce the carbon footprint of the project area by reducing the miles traveled by large trucks that would otherwise deliver purchased forage;
- (vi) Reduce feed costs for PRSRA member ranchers;
- (vii) Allow seashore ranchers and farmers to compete economically with farmers and ranchers outside of the project area;
- (viii) Improve seashore visitor experience by demonstrating an interesting, culturally appropriate and viable working landscape; and
- (ix) Improve seashore visitor experience by reducing large livestock feed truck traffic.

Forage produced on a farm or ranch is a farm product – just as are milk, beef, chicken, eggs, pork, oysters, artichokes, peas and beans. Forage is a very traditional crop. Historically, including within the working landscapes of the project area, ranchers and farmers produced feed crops and sold some of those crops to neighbors who needed the extra forage. PRNS has permitted such sales and off-farm use of forage crops in the same way it permits the sale of other farm products. The working landscape of the project area is a traditional food producing region. Allowing the ranchers and farmers to work together to best utilize and protect the resources is vital to the long term survival of the cultural resource PRNS is entrusted to protect. PRSRA suggests that the sale of any farm product, including forage, be allowed by PRNS for every rancher or farmer in the project area. Disallowing a rancher or farmer the ability to sell their farm products would be a burden not faced by agriculturists outside of the project area. An EA should not be required for this management strategy to be immediately implemented project area wide.

- (b) Range management practices known to be effective for improving forage quality and quantity should be allowed for all ranchers and farmers in the project area. For centuries, these coastal prairie grasslands have been carefully managed by humans interested in preserving the productivity of these rangelands. Careful management using tools including fire, mowing, grazing and planting rangeland forages have resulted in preserving the lush, productive and bio-diverse grasslands Congress meant to protect. PRNS contains perfect examples of how vital this rancher stewardship is. Where the NPS has allowed ranchers and farmers in the project area to do their jobs, using the above tools, the resource has been protected and is largely unchanged since the Shafter era and when Congress recognized the good stewardship of the Point Reyes ranchers. In essentially every place where NPS decided to end livestock grazing and evict the ranch families, the land stewardship ended. These locations without the ranchers' rangeland management have lost their historic grassland character. With the loss of livestock grazing, a change in both plant and animal species assemblages occurred. Where the NPS has chosen to end ranching and the rangeland stewardship provided by the ranchers, the ungulate carrying capacity has largely decreased. The loss of forage due to the lack of land stewardship and lack of range management in these former ranch lands have now contributed to the tule elk crisis. Invasive brush and weeds have invaded these areas to a point that seashore visitors have largely lost access.

PRSRA does not believe that the objective of Congress was to allow these fantastic, sweeping, well managed, accessible grasslands to be lost. PRNS allows some ranchers to use appropriate range management tools and is prohibiting others from using these scientifically proven tools. PRSRA suggests that PRNS treat ranchers and farmers equally and allow every rancher or farmer in the project area to do their jobs, preserving these precious landscapes using the best available range management tools - responsible tools used by land managers everywhere. Allowing ranchers to make range management decisions as they have for generations will help meet the objective stated by PRNS. An EA should not be required for this management strategy to be immediately implemented project area wide.

- (c) Farm product diversification is fast becoming a necessity for the survival of small family farms everywhere. PRNS, in recognition of this fact, has already allowed some ranchers to diversify. Currently permitted for some ranches are small scale row crop operations, chicken operations, farm tours and interpretation and farm stays (ranch bed and breakfast operations). Additionally, diversification helps to achieve the NPS objective of preserving the Shafter era ranching and farming. PRSRA believes that PRNS could, and should, without an EA, allow similar diversification opportunities for all interested ranchers and farmers in the project area so that all ranchers and farmers are treated equally.
- (d) Lodging and public education on seashore ranches and farms are already permitted activities on some ranches and farms. This use should be allowed on any seashore ranch or farm if an operator requests permission. PRSRA understands that environmental review was required when PRNS gave approvals to some, so none should be necessary to issue other approvals. The visiting public is extremely interested in learning about the historic farming and ranching operations and activities. Allowing visiting families to experience the farm through organized tours and to actually stay at the farm are important visitor serving activities. Currently, thousands of visitors are provided tours and educational opportunities yearly at the oyster farm buildings located within the pastoral zone in the project area. Here, the public can learn about the history of PRNS, the value of cooperative conservation where both food production and natural resource conservation coexist in harmony. Allowing more seashore ranchers the ability to offer these kinds of services would be a public benefit. It would also add to the viability of the ranch operation if other seashore ranching families were allowed to provide temporary lodging for individuals and families interested in an actual farm experience. PRSRA does not believe that all PRSRA members would be interested in obtaining permission to provide these

services, but does believe the option should be open to all interested, to create equality among lease/permit holders.

- (e) Best Management Practices (BMP) listed in the EA materials should not only be allowed by PRNS, they should be encouraged and perhaps incentivized by PRNS. All of these practices are implemented to improve environmental quality while preserving seashore ranchers' livelihoods. Added to the list of BMPs should be management intensive grazing (MIG) for those ranchers interested. MIG provides a multitude of rangeland, wetland and riparian zone benefits when planned and implemented properly. MIG is allowed on some seashore ranches and should be allowed for all interested ranchers in the project area. Another emerging, yet crucial BMP is managing the rangelands in a fashion proven to sequester carbon. By following standards set by the Marin Carbon Project (MCP), supported by peer-reviewed science, the project area rangelands could offset all GHG production emitted from PRNS. PRNS should encourage the seashore ranchers interested in employing these MCP practices. The results of following the MCP practices are:

- (i) Increased organic matter in the soil;
- (ii) Increased soil carbon as a result of increased photosynthesis;
- (iii) A reduction in atmospheric CO₂;
- (iv) Increased soil water holding capacity;
- (v) Improved water quality in storm water runoff; (vi) Reduced storm water runoff; and
- (vii) Improved forage production.

There is some potential for rangeland managers to be monetarily compensated for the carbon they sequester. PRNS should allow all credit and compensation to go to the seashore ranchers that have implemented this important BMP, should the opportunity arise in the future. PRNS should also consider compensating seashore ranchers, through rent reduction, for offsetting the PRNS carbon footprint. This ecosystem service provided by the seashore ranchers could allow PRNS to become the example of how a unit of the NPS can become carbon neutral, even carbon beneficial – an important part of a solution to climate change and ocean acidification. BMPs have recently languished at PRNS during an approval process instead of being quickly authorized. One of the stumbling blocks is the unnecessary requirement imposed by PRNS to repeat a NEPA analysis that had already been accomplished by another federal agency. There is only one NEPA. Most of the BMP proposals brought to the PRNS by a PRSRA member have been designed and analyzed by NRCS. NRCS is a federal agency that has significant, long term experience with the project area. NRCS is authorized and fully capable of completing appropriate and legally sufficient NEPA review. PRSRA suggests the new ranch CMP include a provision that PRNS will accept the NEPA review prepared by NRCS and the recommendations by NRCS on any BMP evaluated by NRCS. This agreement will result in:

- A more streamlined process;
- BMPs being implemented more quickly and more often;
- More natural resources protection;
- More experienced individuals analyzing BMPs and making decisions;
- More rancher willingness to initiate a less onerous process to do the right thing for the environment; and
- Less taxpayer dollars wasted by avoiding unnecessary, duplicative review.

- (3) The following operational flexibility should be fully analyzed in the EA, as this historically and culturally appropriate flexibility will provide the necessary options for the ranching families in the project area to remain viable. Agriculture is a dynamic land use. Changes in markets, feed prices, consumer interest and new opportunities require flexibility in agricultural operations. PRSRA ranchers and farmers should be allowed the same flexibility as family farmers outside the project area so that seashore ranchers can remain competitive in the local agricultural marketplace. The flexibilities required to remain viable will not only meet the needs of the seashore ranchers, it will also contribute to the PRNS' stated objectives of preserving the Shafter era cultural landscape and improving visitor experience. PRSRA requests that the following operational flexibilities be fully analyzed in the EA.

- (a) Farm product diversification that was common during the Shafter era (and throughout time due to the dynamic nature of agriculture) is no longer occurring within the project area.

- (i) Diversified livestock species. During the Shafter era, multiple livestock species existed in the project area. Hogs, sheep, goats, chickens, and turkeys all had their place on the farm. PRSRA asks that this historic use be returned to the project area. Ranchers may choose to companion graze sheep with the cattle, others may choose to add pasture raised poultry – both good range management choices that will demonstrate the pastoral zone’s cultural heritage while helping the economics of the ranches or farms. Other ranchers may choose to raise row crops for market and hogs to eat the spoiled vegetables while producing local food and reducing our carbon footprint. PRSRA suggests that PRNS allow seashore ranchers to diversify into additional livestock species. As the grassland resource is best suited for cattle, and a significant population of coyotes exists, it would be expected that the percentage of other livestock used on the ranches would be low, yet important. Ranchers and farmers should be allowed to choose what livestock or poultry species, within the limits of the Shafter era to current, they raise on their farms and ranches. PRNS has allowed ranching operations to change from dairy to beef. PRNS has also recently allowed ranchers to convert their beef operations to dairy operations where a dairy previously existed. PRSRA applauds this flexibility and expects that other ranchers will be allowed the same options and operational flexibility into the future.
- (ii) Diversified crop species. During the Shafter era, the ranches and farms were necessarily diversified to fit into a local food system. Many different crops were grown both for feeding the large staff on these diversified farms and ranches and for sale to the public. Thousands of acres of the project area were under cultivation growing many different crop species. During the Shafter era and after, Point Reyes became the “artichoke capital” of California. Today, reminiscent of the Shafter era, vast fields that once grew artichokes still have the beds and furrows created by the farmers. Presently, thousands of crop acres in the project area produce only forage for cattle. Only a tiny portion of the project area remains in traditional row crop or traditional crop species field crop production. PRSRA ranchers know the history of their ranches or farms, know their soils, know their water availability, know what crops can be dry farmed and know where to find assistance in recovering small scale crop production within the project area. PRSRA suggests that this EA consider allowing seashore ranchers to diversify their family farms by adding small scale crop production, with a selection of crop species appropriate and within the limits of the Shafter era to current time. It is unlikely that all ranchers will choose to diversify into crop production, yet it is vitally important that the choice is available. To avoid the unlikely event that a rancher would like to plant too many acres, PRSRA suggests that row crop production be limited to no more than 15% of the total farm or ranch acreage. This allowance, with the 15% cap, will not only allow the seashore ranchers to remain competitive economically, it will contribute to the PRNS objective of preserving the Shafter era agriculture. It will also benefit the gateway communities surrounding the project area by allowing seashore ranchers to once again be a lively and important part of the local food system and more directly influence the local economy. Allowing the recovery to the Shafter era crop production will also help to meet the PRNS stated objective to reduce its overall carbon footprint.
- (iii) Grazing strategies need to be flexible. Much of the project area has been continuously grazed since livestock were introduced in the 1850s. Rangeland ecologists and scientists have discovered that other grazing systems can be more effective in preserving native plant species, preserving and sequestering carbon, reducing non-native invasive plant species, reducing impacts to wetlands and riparian areas, reducing internal parasite infestation and increasing forage production. PRSRA members have many resources available, including the Marin County Ag

Commissioner, the NRCS, and the University of California Cooperative Extension office (UCCE) to help them choose and implement new grazing techniques that further the dual goals of resource conservation and increased ranch profitability. To implement grazing practices that would result in improved rangeland conservation often requires additional fencing and water sources so that livestock can be managed and rotated in a system that meets these resource and economic goals. PRNS has allowed some ranchers to improve water distribution systems and add fencing to achieve these goals. PRSRA suggests that PRNS allow all ranchers to use these appropriate tools and techniques to improve rangeland conservation and productivity. PRSRA believes that the temporary impacts of placing pipelines, water troughs or fence posts are far outweighed by the improvements to the grassland and wetland ecology. Ranchers should be required to provide evidence that they have consulted with a certified rangeland ecologist to create a grazing plan with improvements to minimize impacts to special status species and special habitat. Ranchers should also be required to provide public access through any new fences that cross PRNS established trails. PRSRA believes that allowing all ranchers to implement these conservation practices when requested would further the PRNS objectives.

- (iv) Remove maximum stocking rates and stocking densities currently imposed on some, but not all, ranchers and farmers within the project area and use Residual Dry Matter (RDM) and other resource monitoring tools to ensure that ranchers are managing responsibly. There is no known basis for, or value in, limiting livestock numbers or animal unit months (AUM)¹³⁸ on some of the ranches. There is also no justification given for the vastly different livestock and AUM restrictions between similar ranches or for the fact that some ranches have no maximum AUM use limits. Rangelands can be more properly managed by understanding the resource and setting resource management goals, including RDM. Stocking rates must be adjusted to compensate for annual weather variations, grazing regime adjustments, pasture improvements through good rangeland stewardship and climate change effects to achieve the targeted RDM. Stocking rate and stocking density restrictions are antithetical to collaborative, resource based rangeland management. Simply counting cows and alleging violations by any rancher exceeding an arbitrary number, even when excess forages exist, serves no purpose. Arbitrary cow limits fundamentally discourage good rangeland stewardship. If a rancher is restricted to a low number of AUMs that is easily achievable without exotic weed management, or soil carbon consideration, that rancher would have no incentive to improve the resource or help to sequester carbon. By removing limits on AUMs or actual maximum livestock headcounts, a rancher is incentivized to improve land stewardship because of the resultant increase in carrying capacity. Lifting these unequal, arbitrary and unnecessary conditions and shifting to a focus on resource condition and RDM will help to achieve the PRNS objectives. PRNS should allow the rancher with the experience on the land to decide how to manage the livestock density on the rangelands while meeting PRNS RDM and other resource goals. Larger carrying capacity is usually related to good pasture management. Ranchers should not be penalized for increasing carrying capacity by increasing the soil and forage health by

¹³⁸ Animal Unit (AU) = 1 cow with calf. Animal Unit Month (AUM) = the amount of feed consumed by one animal unit in a one month period.

charging more rent due to increased AUM usage. This, again, could discourage good stewardship. This EA should consider charging seashore ranchers, into the future, the

same total price for forage consumption that they are currently paying. This could serve two purposes: 1) all ranchers would be incentivized to improve the health of the rangeland resource because it will increase carry capacity for no extra fee to PRNS; and, 2) ranchers will more likely help PRNS to meet resource conservation objectives. This would also be a small way to reward good land stewards for the ecosystem services they and their grazing livestock provide the PRNS and the public.

- (v) On farm borrow sites should be allowed for PRNS rancher rock needs. Historically, seashore ranchers have utilized small on-farm rock resources to serve the needs of the rancher, including road maintenance and armoring high traffic livestock areas including gateways, water troughs and holding pens. The native Monterey shale present on some of the ranches is softer and less angular than typical purchased crushed rock, making it the perfect choice for livestock. A few years ago, PRNS decided to close these important local resources. This taking has caused ranchers to spend significant amounts of money to purchase rock and to have the rock trucked long distances to the seashore ranches. The purchased rock is generally hard, crushed rock with angles and sharp points risking injury to livestock hooves. PRSRA suggests that the EA consider allowing seashore ranchers to resume the historic use of at least one, two or three of the many sites that have recently been disallowed by PRNS. This NEPA process should consider the benefits of using on-farm resources in lieu of long distance trucking. PRSRA is willing to assure PRNS that the required reclamation plan is in place with the California Department of Conservation. This will give the guarantee to PRNS and the public that the small quarries will eventually be properly reclaimed with soil cover and appropriate vegetation. PRSRA suggests that the rock can be used only within the project area and could not be sold for any other purpose. This is an opportunity for PRNS to collaborate with the seashore ranchers to improve ranch conditions and profitability while furthering the PRNS' stated plan objectives. Restoring this historic activity would result in:

1. Improved ranch road maintenance resulting in less erosion and resource damage;
2. Reduced large truck traffic on the narrow PRNS roads;
3. Gateway communities appreciation of the elimination that the new rock truck traffic has caused by the ranch resource closure;
4. Increased visitor enjoyment by limiting truck traffic;
5. Demonstrated PRNS / PRSRA member collaborative management;
6. Reduced injury to, and thus more humane treatment of, livestock;
7. Reduced potential for introduction of exotic invasive weed seeds with rock delivered from outside the project area;
8. Better access for PRNS staff that continuously use ranch roads maintained by ranchers;
9. Improved rancher ability to meet the requirement in their current SUPs to maintain the ranch roads;
10. Reduced PRNS carbon footprint; and,
11. Increased viability of the seashore ranchers.

- (vi) Family succession plans should be included in PRNS' leases/permits. In recent years, PRNS evicted the Horick family, a multi-generational seashore ranching family, after the permit/leaseholder (Vivian Horick) was unexpectedly killed in an auto accident. Even though the ranch in question, the D Ranch, is located within the pastoral zone (a zone set aside by Congress to continue the traditional ranching at Point Reyes) PRNS has disallowed much of the ranch, and most of its buildings, to continue in agriculture. After evicting the Horicks, PRNS unilaterally decided to completely change the use---and the intensity of use---of a significant portion of this agricultural land without initiating a public process pursuant to NEPA. Instead of allowing ranching to continue on all of the D Ranch as decreed by Congress, and thus expected by the public, PRNS---without the agreement or participation of the public--allowed tule elk to proliferate on this ranch located within the pastoral zone. This significant federal action clearly had the potential for adverse impacts to the human environment and those impacts should have been studied before the action was taken. This federal action has resulted in a temporary loss of agricultural production on this historic ranch. PRSRA believes that if a succession plan was in place at the time of Vivian Horick's death, the same historic family would still be ranching on their historic family ranch that they built with their own hands in the late 1800s and the tule elk would not have invaded the D ranch and the surrounding ranches. The long term viability of the small family farms located in the project area depends on good succession planning. PRNS should require that every seashore farmer or rancher has a plan that describes who will succeed the current lease/permit holder. This would avoid problems that will invariably arise if a permit/leaseholder unexpectedly dies or if a current permit/leaseholder is evicted by PRNS. The required planning process should also include provisions for who may assume the agricultural permit/lease if a current ranching family decides it does not want to continue its family farming tradition. It is of critical importance to PRSRA that former ranches be returned to production and that no other ranches be arbitrarily or otherwise removed from agricultural production. A clear planning process can help to avoid future conflicts.

This is example of where a non-profit made up of local experts, managers and community members, as in Cuyahoga Valley, could recognize the value of the existing multi-generational families' experience and connection to the land in choosing who will be selected to operate the ranches within the working landscapes.

This EA should also analyze all the adverse effects that would result from a loss of even one ranch or farm within the project area, including:

1. Loss of public trust in NPS and PRNS;
2. Damage to the regional agricultural infrastructure by reducing critical mass to support:
 - a. Processors of farm products
 - b. Distributors of farm products
 - c. Vendors of farm equipment and machinery
 - d. Consultants, and

- e. Veterinarians; and
 - 3. A precedent for anti-agriculture groups and individuals to use to continue to attempt to remove agriculture from the project area.
- (vii) On-farm value added opportunities should be considered in this

EA. In its printed materials PRNS has suggested for review, under Ranch Operations/Activities, "Diversification (small scale row crop, value added operations within existing structures, etc.)" PRSRA believes that this language is unnecessarily restrictive and should be broadened and rewritten. PRNS has recently authorized and permitted tens of thousands of square feet of new building space on seashore dairies. PRSRA applauds PRNS for allowing these important buildings to be constructed in the coastal zone as it has allowed those dairies to milk more cows, to reduce the water quality impacts caused by the dairy livestock, and to increase the profitability of the dairy. PRSRA questions why PRNS would want to limit value added facilities to only existing structures. In the region surrounding the project area, both the Marin Countywide plan and the local coastal plan allow for new structures to house value added facilities, because those jurisdictions understand the need to allow these sorts of activities to keep agriculture in Marin viable. The project area is in Marin and the seashore ranchers have the same needs as those outside the project area. The Shafter era agriculture within the project area was replete with almost every kind of on-farm processing. On the ranches and farms, there were vegetable packing facilities, butter churning facilities, cheese making facilities, slaughterhouses, butchering and packing facilities---all a part of a thriving, local food system---the kind of local food system that our nation is recognizing we ought to return to and embrace going forward (and a system that the European nations, and much of the world, have never lost sight of). The infrastructure to accommodate these kinds of activities no longer exists on many of the seashore ranches. This EA should not only consider allowing these sorts of uses within existing ranch structures, but also contemplate the effects of replacing buildings and infrastructure lost over time, or that have not previously existed. PRSRA does not expect all seashore ranchers will be interested in using an existing structure, or in building a new structure, to commence on-farm processing. However, for those ranchers that are interested, PRNS should give permission to do so. Allowing value added on-farm processing would:

1. Help to achieve the objective of preserving Shafter era agriculture;
2. Improve the economics and profitability of seashore ranchers;
3. Allow interested seashore ranchers to become an important part of the local food system by moving away from a monoculture commodity based agricultural system and back a locally focused system;
4. Promote opportunities for young ranching family members to become excited about the farm and allow for a viable future;
5. Be consistent with PRNS policy to allow on-farm processing as it has always allowed the oyster farm to process, pack and ship oysters from its buildings located in the pastoral zone within the project area;
6. Allow all ranchers and farmers interested in on-farm processing to grow, process, pack and ship farm products (simply treating each permit/lease holder equally);
7. Improve the gateway community's access to wholesome, locally produced food;

8. Reduce the trend of small family farms ceasing operations due to the inability to compete with large operations on commodity priced products.

Additionally, seashore ranchers should be allowed to process local farm products from outside the project area. The seashore ranchers are part of a larger, local food system. The seashore boundary should not separate the seashore ranchers from the larger local agricultural community.

This EA must also evaluate the benefits of allowing not only the products grown on a particular ranch unit for on-farm processing but also for products produced on ranches and farms in the region. The benefits of allowing seashore farm product processing include; 1. Opportunities for collaboration between seashore ranchers;

2. More accurate representation of the Shafter era agriculture and agricultural product processing;
3. Reduction of the overall number of on-farm processing facilities; and,
4. Allowance for more expensive processing to be accomplished than a single seashore rancher could not justify on a one ranch basis.

(viii) On-farm retail sales should be allowed on all ranches and farms within the project area. PRNS has consistently, since the formation of PRNS, allowed on-farm sales at the oyster farm, located within the pastoral zone within the project area. To create uniformity and equality, other interested seashore ranchers should also be allowed to sell their products at the farm. This EA should assess the benefits of on-farm sales, including:

1. New visiting public opportunities to taste and take home the products of the PRNS regional, historic working landscapes;
2. New marketing opportunities for vegetables and value added products;
3. New educational opportunities for the visiting public and seashore ranching families to connect;
4. Improved economic opportunities for seashore ranchers; and,
5. Renewed opportunities for seashore ranching family members to become/stay involved in the family farm.

This authorization would be consistent with what is sold at the on-farm retail shop at the oyster farm. The oyster farm currently sells, and has recently sold, shellfish it grows on-farm as well as flowers grown at the M Ranch, salmon, halibut and crab landed at the historic fish dock near Chimney Rock, and certified organic beef, artichokes and other row crop vegetables grown on the G Ranch. Allowing retail outlets, or "farm stands" on ranches within the project area to sell more than what is simply grown on that specific farm or ranch will result in the following benefits:

1. Allow for collaboration between PRSRA members;
2. Reduce the number of on-farm sales locations;
3. Add variety to the farm stands, thereby improving visitor experience; and, 4. Provide consistency, uniformity and fairness to all seashore ranching and farming families with permits/leases.

Additionally, seashore ranchers should be allowed to sell local farm products from outside the project area. The seashore ranchers are part of a larger, local food system. The seashore boundary should not separate the seashore ranchers from the larger local agricultural community and local food system.

PRSRA fully supports equal treatment and expects that opportunities given to one permit/lease holder will be offered to all other lease/permit holders. PRSRA does not expect all seashore ranchers will be interested in initiating on-farm sales, but those interested should be given the permission. This EA must consider on-farm sales locations sited in temporary structures, permanent existing structures and new structures. Given the extreme weather conditions in most of the project area, a safe, indoor facility is most likely the most appropriate location.

- (ix) D Ranch conflict solution. PRNS evicted the Horick family in late 1999. The D Ranch remains an historic piece of the agricultural land located within the pastoral zone. PRSRA is unaware of a NEPA process undertaken at the time to consider the effects of changing its use - to remove agriculture from a significant portion of the D Ranch located within the congressionally designated pastoral zone specifically authorized for its continued agricultural use. Resuming the historic agricultural activities on the entire D Ranch is an important step in preserving this historic working landscape as a complete unit. Since PRNS ended the historic use of agriculture in the pastoral zone, apparently without the required public process or environmental review under NEPA, PRSRA presumes that resuming the designated, historic land use will also not trigger a NEPA review. PRSRA requests that PRNS issue permits for the building complex and the entirety of the rangeland at the D Ranch. This would go a long way to reassure the public that PRNS is truly committed to preserving agriculture in the project area, rather than dismantling it.
- (x) New worker housing and upgrading existing worker housing where necessary should be allowed and encouraged by PRNS. As agriculture changes, staffing levels need to change as well. For example, a rancher currently producing only beef may be interested in restoring some of the agricultural diversity that one occurred on the ranch – perhaps 15 acres of row crops. This recovery of the Shafter era agriculture would most certainly require that additional farm workers also return to the landscape. Over the decades, PRNS has allowed ranchers to add housing on the ranches and farms without initiating a NEPA process. Given this fact, an EA is probably not necessary to allow other interested ranchers and farmers to add housing. Nevertheless, PRSRA would like the new CMP to expressly authorize additional worker housing on the ranches if the rancher can demonstrate the need. All new housing could be limited to housing necessary for rancher family members and required farm workers. Benefits of new housing to meet the needs of the ranchers include:

1. Reduced traffic on seashore access roads;
2. Reduced GHG production from commute traffic;
3. Reduced danger to employees expected to commute during odd hours:

- a. For example, an employee may need to arrive at 2:00AM to be at the ranch in time for milking. This condition could lead to more hazards, including hazards caused by, and injury to nocturnal wildlife on roadways;
4. Continued Shafter-era agriculture where ranch workers live and work on the ranch;
5. Increases affordable housing in West Marin county, rather than exacerbating the affordable-housing shortage;
6. Improved seashore ranchers and farmers competition with ranchers and farmers outside the seashore for skilled employees;
7. Reduced adverse effects to the rancher, the livestock and or the employee if an employee meets difficulty during commute and is late, or misses work; and
8. Improved living conditions and lifestyle of the ranch workers if they do not have to commute from long distances.

2) Management of Tule Elk on Ranchlands

PRSRA objects to the section entitled “Management of Tule Elk on Ranchlands” found in the materials describing the current ranch CMP EA. These materials were prepared by PRNS with the intent to educate the public of the elk “issue” and to encourage public comment. This PRNS description of the issue implies that PRNS has a plan objective of keeping tule elk on the ranchlands and managing them there. It appears as if PRNS is soliciting public comments about managing elk *on* the ranchlands. PRSRA opposes this language and suggests that this sentence be changed to the more accurate and legally correct requirement to which PRNS must comply: “Update the 1998 Environmental Assessment and Elk Management Plan.” Unfortunately, damage has already been done by suggesting to the public, during this important comment period, that the new existence of the invasive tule elk on to the pastoral zone is a done deal. The PRNS, its contractors and its experts must consider the fact that the public was given this misleading statement prior to commenting.

In 1998, an environmental assessment, pursuant to NEPA, was undertaken by PRNS to consider alternatives about how to manage the overpopulated elk on Tomales Point that were known carriers of the dreaded Johne’s disease, a serious disease transmittable to cattle. One plan alternative that would have allowed the tule elk to roam on the ranchlands in the pastoral zone was rejected by the public.

The 1998 Elk Management includes a map that clearly describes, with a distinct line around the perimeter, the 18,000 acre designated elk range. The 1998 plan states that the PRNS would establish the free ranging elk herd “*within*” those 18,000 acres. This range intended for the elk does not include any ranch land and is fully located within the Limantour wilderness area. The current CMP EA materials include a similar map showing where the elk currently exist, but now excludes the designated elk range. This is misleading. The public may not know that the elk have been allowed to proliferate outside the limits of the designated elk range found in the current elk management plan. By failing to include the designated elk range in the map, the public has not been properly informed to provide meaningful comments on the EA. The PRNS, its contractors and its experts must consider the fact that the public was given this misleading map prior to commenting.

The 1998 Elk Management Plan recognizes the fact that introduced tule elk can become invasive and have the potential to adversely affect seashore resources, including cattle. The plan is clear that PRNS is to manage the elk so that they do not harm any other permitted use within the seashore. To manage the expected elk proliferation and to avoid harm to other permitted uses, the plan allows the PRNS and CDFW to use capture and relocation of wayward elk, contraception of elk, and even lethal culling. For the first several years following the 1998 public process and plan approval, PRNS utilized *all* of these approved tools to manage the

elk and kept them off the pastoral zone. During these years there was no controversy because everyone interpreted the plan the same way. The contraception program appeared to be hugely successful (see Science & Conservation Center letter, Attachment C). When a rogue elk appeared on a ranch, the rancher called the seashore staff and the animal was tranquilized and brought back to the designated elk range. In at least one case, a repeat intruder was shot and killed by PRNS. The PRNS was quite clear, and understood their responsibility when they looked back at 2001 in the PRNS publication *"Point Reyes National Seashore 2001 Year in Review"* (attachment D) where PRNS stated *"Since their release, the new herd has been carefully monitored to ensure animals remain within Seashore boundaries, do not interfere with cattle ranches within the park and are not shedding the organism that causes Johnne's disease."* (emphasis added) Unfortunately, and still without explanation, sometime around 2002, PRNS ceased management of the tule elk. Contraception ceased. Relocation ceased. Culling ceased. At the time tule elk management ended, PRNS began to allow tule elk to proliferate in the pastoral zone and harm the ranchers---the very permitted use the plan set out to protect.

Since PRNS reversed its management of tule elk and allowed the elk to invade the pastoral zone, PRSRA members---as well as PRSRA itself---have made dozens of attempts to inform the seashore staff and management of the devastation caused by the tule elk. Additionally, both individual ranchers and the association have made repeated requests to have the elk managed per the elk management plan as PRNS did for the first few years following the public NEPA process and plan approval in 1998. The unauthorized elk herd on the pastoral zone is growing at a rate of 12% per year, a full doubling of population every 6 years. The damage caused by the elk invasion to the ranchers is now catastrophic. PRSRA considers this invasion now an emergency---a crisis that must be addressed immediately.

PRSRA strongly opposes the new PRNS efforts to enhance tule elk habitat within the pastoral zone. These PRNS efforts, including the creation of new water sources, are changing the use of an area within the pastoral zone, without the required public process necessary to make such dramatic changes. The PRNS has chosen to create an elk attractant within the pastoral zone meant to be used by the ranchers in the working landscapes, rather than improving the habitat in the designated elk range where the elk belong. This EA must not be used to validate improper management practices just because PRNS has unilaterally initiated those practices outside of, and in conflict with, the current elk management plan. This EA must fully evaluate the benefits of habitat enhancement within the elk range and the adverse effects to the project area if elk habitat enhancements continue within the ranch lands.

PRSRA strongly opposes the current elk hazing by PRNS. This EA should evaluate the adverse effects to the elk, the ranchers' fences, the ranchers' water systems, the ranchers' livestock and the continuous cost to the taxpayer to run elk in circles.

This EA must evaluate whether the PRNS has the authority to immediately resume the management of the tule elk, using the tools already authorized in a previous EA and current operative elk management plan. These are the same tools PRNS previously used pursuant to the current plan to ensure the elk "do not interfere with cattle ranches within the park and are not shedding the organism that causes Johnne's disease" that can be transmitted from elk to cattle. If PRNS believes that it does not currently have the authority to remove the tule elk from the pastoral zone, the seashore superintendent can sign the proposed amendment¹³⁹ and the problem could be immediately solved.

¹³⁹ Attachment B - addendum to management plan

PRSRA believes that the only solution that will meet the objectives of this plan is to build a fence on the boundary between the subject area ranch land and the wilderness area that contains, in its entirety, the designated tule elk range. The free ranging elk could continue to thrive in the area where they were intended to be and the ranchers could get back to providing stewardship for the resources and food for the community. This EA should fully consider the adverse effects of allowing the violation of the 1998 elk management plan to be validated by allowing any elk to remain on the pastoral zone, including: a) Ongoing harm to ranchers and their livelihoods;

- b) Ongoing risk of injury, disease or death to cattle;
- c) Ongoing risk of disease to tule elk from cattle;
- d) Increased taxpayer expense to manage elk within a ranching zone; and,
- e) Ongoing conflict with congressionally established permitted ranchers.

This EA must also recognize that the seashore ranchers are more endangered than the tule elk. The dairies within the project area represent some of the last remaining dairies in the ocean side dairy region of the north coast of California. In contrast, tule elk population in California is rapidly expanding, with over 4000 elk on 22 different sites.

3) Floodplains, Wetlands, Riparian Areas

PRSRA is unaware of any new ranching or farming activities requested within floodplains, wetlands or riparian areas. The ranching and farming activities that may be occurring within these areas have been part of the environmental baseline for around 150 years. PRSRA ranchers, in collaboration with NPS, NRCS, RCD and others have made many modifications over the years to reduce impacts to these important areas. PRSRA commits to continuing its partnership with agencies and organizations with the goal of reducing negative environmental impacts to floodplains, wetlands and riparian areas. Any existing (current environmental baseline) effects should be excluded from this process. NEPA requires a federal agency to evaluate only new effects that have the potential of altering the status quo.

4) Species of Special Concern

NEPA requires a federal agency to analyze the effects of new activities on the human environment. Ranching and farming activities are a part of the environmental baseline. The status quo of continuing ranching should not be evaluated within this environmental assessment process; it should be categorically excluded, pursuant to NEPA. Special status species or species of special concern analysis should be limited to new activities with a potential to have effects on the environmental baseline. This CMP EA should be limited in scope to the effects of new effects anticipated from new development and changes from the status quo only. During analysis of potential impacts to species of special concern by new activities, the plan objectives should be kept in mind. Using potential adverse impacts to special status species to block requested changes to the status quo, especially for activities allowed elsewhere in Marin County, would create further unfair disadvantage to seashore ranchers and undermine the plan objective.

5) Health and Safety

- Standards for operator and worker housing.

PRSRA is puzzled by this section that PRNS has identified as an issue to be included in the Ranch CMP EA.

The worker housing on the ranches and farms have health and safety standards that must be followed. PRNS and the United States Public Health Department (USPH), on an annual basis, inspect all worker housing on every historic ranch or farm located within the working landscapes of GGNRA and PRNS. PRNS and USPH then provide inspection reports to the ranchers and farmers that provide and maintain the housing. If the agencies find any health or safety non-compliance, they require the rancher or farmer to correct the deficiency. This regulatory oversight seems to be appropriate in assuring health and safety standards are met for worker housing.

PRSRA is concerned that because PRNS listed worker housing health and safety as an “*issue*”, the public perception may be that there is a problem with health and safety of the workers’ housing on the ranches or that the changes contemplated by this EA may result in adverse effects to worker housing health and safety.

PRSRA does not believe a public process is necessary to ensure that the existing health and safety standards be applied to new housing. It seems self-evident that the existing standards and inspection protocols would apply.

6) Vegetation

- a) Restoration of native prairie. It is widely recognized that most of the native plant species once found in the coastal prairie grasslands within the subject area have been replaced by non-native species, either intentionally or accidentally, over the past 150 years of European-American land use. PRSRA believes that true restoration of native coastal prairie is only possible in rare locations within the ranch lands in the subject area. Generations of livestock grazing, exotic seed planting, tilling, crop production, imported feed with exotic plant seeds have all contributed to this shift. These practices, which have changed the landscape and the plant communities beginning 150 years ago, have continued shaping the landscape through the Shafter era and into the present.

This EA should study negative effects to the ranchers and their livelihoods if restoration of native plant species takes priority over the continuation of the normal ranch practices that have been part of the working landscapes from the Shafter era through the present time. PRSRA is willing to work with rangeland ecologists and certified rangeland managers to locate areas best suited for row crop production, forage crop production, rangeland planting, rangeland mowing to control invasives, waterline placement, water trough placement, fence installations and other BMP implementation. PRSRA recognizes that there are a few rare locations where native vegetation dominates and areas where special status species exist. PRSRA commits to working with NPS, NRCS and others to carefully and appropriately manage these sensitive areas. These rare areas have been identified over the years and ranchers and farmers already cooperate with agencies to help preserve these resources.

PRSRA observes that the most serious threat to the native coastal prairie *grassland* (a system that has been managed by humans for centuries, perhaps millennia) is the NPS’ removal of ranches and farms that formerly provided the necessary stewardship. In areas that have been renamed “wilderness,” a tragic shift has occurred or is occurring. Instead of the traditional, native grassland, these areas have become a brush covered landscape. A landscape (Limantour wilderness) that has facilitated catastrophic fires resulting in private property devastation at the wildland-urban interface. A landscape that no longer supports the same assemblage of wildlife species that the native coastal prairie grasslands once supported. A landscape that does not resemble what the NPS is asking ranchers to accomplish within the project area. This unmanaged grassland likely contributed to the 24% loss of tule elk in the Limantour elk range during last year’s drought. PRSRA suggests that NPS allows the historic ranchers to continue the same rangeland stewardship practices, working with the agencies and experts, as they have for

generations. PRSRA also recommends that NPS focus their rangeland restoration efforts on the most critical areas – the Limantour and Tomales Point elk ranges.

This EA should also consider the benefits that could be provided to coastal prairie grassland by properly managed livestock grazing on ranches within the project area where grazing has recently ceased. Returning rancher stewardship to these coastal prairie livestock pastures at no cost to PRNS (actually PRNS would collect SUP fees) are likely to further the NPS goal to preserve the coastal prairie grasslands. PRSRA supports the applications by the historic families in the project area to resume historic grazing operations on these ranch lands in desperate need of rangeland management.

- b) Dunes.** The sand dunes located within the pastoral zone have long played a role in the cultural working landscapes of the Shafter era agriculture through to the present. Thankfully, PRNS has included the dune management in this NEPA process. This process may now work to improve the earlier NEPA process undertaken by PRNS. The working landscapes – ranch CMP EA is the proper context to evaluate the effects of the dune management. The sand dunes have always been a threat due to the highly erosive nature of the sand. High winds can easily result in significant sand movement, potentially covering valuable pastureland.

The sand dunes have been managed by European-Americans for a long time. To reduce the shifting sand, people have planted vegetation to hold the sand in place. After establishment of PRNS, NPS also planted beach grasses and ice plant to hold back the blowing sand.

Recently, PRNS, at the objection of PRSRA, has initiated projects to remove the vegetation that was planted to hold the sand in place. Erosion control measures implemented by PRNS have failed. The result was exactly what PRSRA was concerned about. The moving sand covered valuable pasture land, fences and endangered plant species, including the endangered grass species Sonoma Alopecurus as well as the rare habitat for the Myrtle's Silverspot Butterfly. PRSRA asks that this EA properly consider the dunes as part of the cultural working landscape with non-native plant species. This EA should consider the adverse effects of removing the non-native vegetation from the dunes.

- c) Non-native species management.** PRSRA members are committed to work with rangeland managers, NPS, NRCS, UCCE, Marin County Ag Commissioner and others to employ best management practices to help manage non-native plant species. PRSRA requests that this EA study the well-established benefits of using livestock grazing, multi-species grazing, MIG grazing, tilling, mowing, mechanical harvesting, fencing and other agricultural practices on control and management of non-native invasive plants.

PRNS currently uses herbicides for the control of non-native invasive plants within the project area. PRSRA request that the EA study the benefits of allowing ranchers, in certain circumstances, to use herbicides to control invasive weeds. On occasion, invasive weeds may begin to invade areas inaccessible to mechanical control. Sometimes the invasive is not palatable to cattle. In these circumstances, PRSRA members believe that the use of an herbicide may have less adverse environmental impact than the rampant proliferation a non-native invasive weed may have. Although it may be only on rare occasions, PRSRA asks that PRNS authorize the use of herbicides when necessary.

- d) Brush management.** Both native and non-native brush species require management in coastal prairie grasslands. Without brush control, the grasslands will likely become lost to brush invasion. This loss of native habitat due to brush invasion has already been demonstrated at PRNS in areas where NPS has removed ranching. Coastal prairie grasslands require management. For hundreds of years, or perhaps millennia, humans have facilitated the persistence of this important ecosystem, through fire, grazing and

mowing. PRSRA requests that this EA fully evaluate the fact that brush management has occurred on coastal prairies for all recorded history, a fact that has also been identified through anthropological review. This EA should also consider the ecosystem benefit of preserving the grassland habitat by allowing ranchers to control invasive brush from their pasture lands. PRSRA is committed to work with the agencies to identify the best timing for brush removal to reduce adverse effects to other species.

Rangeland ecologists and watershed managers understand that nutrients and sediments are better controlled and better treated by grass covered soil than brush covered soil. The bare soils often found in the shade of the invasive brush allow water to travel more quickly and with less absorption and less plant nutrient uptake. PRSRA requests that the EA study the water quality benefits of allowing ranchers to continue the tradition of brush control as well as the degraded water quality that would result in any prohibition of brush control.

e) Fire regime. Coastal prairie grasslands require disturbance and invasive species control.

Native Americans used fire as a tool to manage the project area before European-Americans arrived. The record tells us that the Point Reyes peninsula and surrounding rangelands were covered with lush grasses and full of wildlife – largely due to the regular burning. European-Americans continued to employ fire as a rangeland tool.

Most current PRSRA members used fire extensively for brush control on these ranches until the NPS stopped the use of fire. PRSRA believes that fire is an appropriate tool to control brush in certain circumstances and, because of the risk of wildfires, not in others.

The cessation of use of fire and grazing has led to an increase in fire fuel loads, especially in the Olema Valley. Grazing can reduce fire fuel loads in these areas. PRSRA requests that the EA study the benefits of re-introducing grazing to these areas and how this could reduce the risk of catastrophic fires causing harm to the resource, personal property and the potential personal injury or death resulting from avoidable wildfires.

PRSRA suggests that in wilderness areas, where almost all native grassland and the species assemblages it supports have been largely lost (especially due to unmanaged brush invasion), fire be considered as a restoration tool. PRSRA asks that this EA also consider the benefits to the human environment resulting from fire fuel reduction and minimizing the risk of more PRNS catastrophic wildfires that prescribed burning could provide. This EA should also analyze the increased wildlife carrying capacity, including that of the tule elk, that would result if PRNS began to manage the now threatened coastal prairie grasslands in the wilderness areas.

7) Visitor Use / Recreation

a) Interpretive / educational programs regarding historic and contemporary ranching operations.

Historically and currently, interpretive and visitor serving programs within the project area are provided by Drakes Bay Oyster Farm. Approximately 50,000 visitors per year are invited to farm tours as well as other interpretive and educational services at the oyster farm. The oyster farm educational services are part of the curriculum of many elementary schools, high schools and colleges. At the oyster farm, the visiting public is able to learn about the history of the working landscapes and the responsibility NPS and the ranchers have to preserve and protect the working landscapes as an important part of our cultural heritage. PRSRA recognizes that a NEPA process previously began to evaluate the interpretive services at the oyster farm. One of the provisions of NEPA is that this EA can re-evaluate what was done in a

previous document (just as with the previous elk EA). The interpretive services currently provided by the oyster farm on a daily basis are most certainly an important part of the current ranch CMP EA baseline.

Public education has always been a central interest to PRSRA and is prominently featured in PRSRA's mission statement. PRSRA believes that PRNS does not currently provide any meaningful interpretation of the ranching and farming within PRNS or GGNRA. PRSRA worked for years to arrive at one temporary poster that would be periodically displayed at the PRNS headquarters visitor center. PRSRA believes that the visiting public deserves the interpretation and educational programs now provided by the historic oyster farm and that those programs should be allowed to continue. Because the oyster farm buildings, where the visitor serving activities are provided, are located within the pastoral zone fully surrounded by the other farm and ranch land project area and is easily accessible to the public, this EA must include this vital public education resource. PRSRA not only supports the continuation of the oyster farm interpretation within the working landscapes, it believes that ranch land interpretive and educational programs should be expanded.

PRSRA requests that this EA fully evaluate the benefits of the existing interpretive and educational services provided by a PRSRA member at no cost to the visiting public or the taxpayer. This EA should fully consider what it would cost the taxpayer if NPS were to replicate the oyster farm interpretive center to celebrate the working landscapes of the project area. The costs include rent, electricity, a public water system, a waste water treatment system, building maintenance, restroom maintenance, staff time and materials to host over 50,000 visitors per year, 7 days a week. The EA should evaluate the benefit of having the public interpretive center in the middle of the working landscapes. It should consider the educational value of having the center on a working farm where children can see and learn about where their food comes from. It should also evaluate the benefits of having a traditional multi-generational ranching family leading the educational programs.

The EA should also consider the fact that people passionate about agriculture may not choose NPS for their career. This EA should evaluate the adverse effects of NPS employees, generally more interested in natural resources, providing agricultural interpretive services.

- b) Access. PRSRA members are always willing to cooperate with preserving existing public access through the ranch and farm lands in the subject area. Any contemplated changes to the current access baseline should be evaluated in this EA. New public access through ranch land usually results in more work for the rancher. These challenges could include new gates, gates being left open, prohibition on new important fencing or other BMP, parking challenges, disturbance to livestock, wildlife disturbance, and loss of privacy.

This EA should also analyze the fact that new access could also lead to potential risk to the visiting public. New public access through historic livestock pastures could disrupt normal animal behavior. Changes in stimuli and disturbance can lead to increased anxiety and, in some instances, aggression in domestic livestock.

This EA should also evaluate the benefits of NPS providing indemnification to the ranchers in case of injury to members of the public caused by livestock. PRSRA believes that this would be fair because it is NPS that is encouraging public access through ranchers' livestock, not the ranchers.

- c) Recreational opportunities. PRSRA is fully aware of the public's support of continued agriculture in the subject area and public's desire to know more, and to experience more about the historic working landscapes. The following are two examples of recreational opportunities already allowed in the

seashore within the project area. An EA was not initiated to allow these activities to be conducted in the past, therefore it should not be required now. PRSRA believes that simple fairness would suggest that if others are interested in similar activities, PRNS should permit those as well.

Today, the oyster farm is the only member of PRSRA organized and permitted to offer regular farm tours. The oyster farm does not currently charge any fee for the tours. This EA should consider the effects on the human environment of allowing other ranches and farms to provide farm tours if requested. If NPS would allow other ranchers and farmers to offer tours at a fee, the public would benefit from the recreational value and the rancher would benefit from the income generated.

Today, the Mendoza family (B Ranch) is the only member of PRSRA allowed to have farmstays. Overnight stays on other working ranches within the project area would offer more recreational opportunities for visiting families interested in experiencing the working landscape culture with the families that have been a part of the landscape and history for generations. This EA should evaluate the public benefit of the ranchers offering daytime farm work experiences and overnight on-farm accommodations as well as the benefit to the ranching family by allowing additional farm income.

Today, the oyster farm is the only PRSRA member permitted to sell its products to the visiting public in its on-farm store. This is a valuable recreational opportunity for the visiting public. It is truly exciting for families and children to experience a visit to the working landscape, see the farm and have the opportunity to purchase the farm product at its source. This EA should evaluate the benefits of on-farm product purchasing opportunities for the visiting public. These opportunities provide the following to the visiting public: education, recreation and a connection to a historic, yet fully active food producing region. All the while, these opportunities also help the ranchers and farmers connect with the public that appreciates their work and provides additional farm income.

8) Planning & Protection of Ranch Complexes

- a) Define areas for ranch infrastructure improvements. PRNS has recently allowed large expansions of ranch infrastructure well outside of the general cluster of buildings or previously improved area. On one ranch in the pastoral zone, PRNS facilitated the permitting and authorization, including permit from the California Coastal Commission, for the construction of two large barns for animal housing and a new manure pit for additional waste storage. This new development outside of the building complex was necessary to improve water quality and to allow the dairy to increase herd size and increase profitability of the dairy. Even though this project expanded the previous boundaries of the ranch complex, the expansion area represents only a small fraction of the ranch area. This EA should recognize the dynamic nature of agriculture within the project area and recognize the benefit of remaining flexible to add ranch infrastructure outside of an existing building complex or an imaginary future complex limit. This EA should consider the adverse effects that could result if new ranch complex limits are established without the full understanding of what the future may bring. PRSRA supports the notion that new building and development be situated within the existing ranch complex as possible. As in the above example, it is unlikely that any ranch or

farm within the subject area could fit this extensive development within its current building complex. Therefore, the same flexibility that was offered to that rancher should be offered to other ranches and farms as necessary.

- b) Define roles and responsibilities for maintenance of existing infrastructure. The roles and responsibilities for maintenance and repairs of existing infrastructure are clearly defined in the SUPs issued to ranchers

and farmers within the subject area. PRNS applies the rules unequally between the permit holders. Over the years, PRSRA members have asked PRNS to adhere to the conditions in the permit for each and every permit holder. PRSRA does not believe that a NEPA process is necessary to compel PRNS to uphold the agreements in the SUPs equally among all permit holders. Similar to other “issues”, PRSRA is unaware of any changes in roles or responsibilities regarding infrastructure maintenance or repairs contemplated by this ranch CMP EA. If NPS is proposing changes to the roles and responsibilities, it should identify those proposed changes in the purpose and need or in the plan objectives. Once the NPS has established a defined project that can be evaluated, PRSRA and the commenting public can provide meaningful comments.

Generally, PRSRA accepts the roles and responsibilities for maintenance and repair of existing infrastructure as agreed upon in the current SUPs and opposes the unequal performance of PRNS responsibilities under those permits. The permits require the ranchers and farmers to be fully responsible for cyclic maintenance including fencing, painting, water system maintenance, road maintenance and other items. The permits also state that the NPS is responsible for capital improvements. PRNS should be paying for major, long term infrastructure repairs. The common practice is that PRNS refuses to pay for capital improvements as set forth in the permits. Occasionally, however, PRNS has agreed to pay for capital improvements. One example is that requests for roof replacements with 30-year life expectancies are regularly denied, yet PRNS has recently paid for new roofs for one rancher. There are other examples of such unequal performance of PRNS responsibilities.

PRSRA is concerned that when rural land appraisals are completed by PRNS contractors, the appraisers are unaware that it is the rancher or farmer that has usually paid for capital improvements, not the NPS as the permits suggest. The resulting appraisal may be higher than if the appraiser knew the rancher actually has to pay for capital improvements.

If this EA actually does contemplate a change to the roles and responsibilities for maintenance and repairs of existing infrastructure, PRSRA asks that it be informed of the desired changes. PRSRA commits to working collaboratively with PRNS on any appropriate changes to the current agreements. With or without changes that may or may not trigger NEPA, PRSRA expects that full, fair and even implementation will be established throughout the project area.

9) Floodplains, Wetlands, Riparian Areas

- a) Buffers for water quality protection. PRSRA members have been working and will continue to work with NRCS, RCD and NPS to establish appropriate buffers for sensitive riparian areas. PRSRA is not aware of any PRNS plan to change the existing protections. If NPS has a proposal to change the existing baseline with new restrictions it should make that proposal available to the public so that meaningful comments can be given. If NPS does not have a proposal to change the status quo, PRSRA will continue to collaborate with the agencies to protect sensitive habitats and no evaluation is necessary in this EA.
- b) Habitat enhancement. PRSRA members have been working and will continue to work with NRCS, RCD and NPS to enhance habitat in sensitive riparian and wetland areas. PRSRA is not aware of any PRNS plan to change the existing PRNS/PRSRA collaborations. If NPS has a proposal to change the existing baseline with new requirements or restrictions it should make that proposal available to the public so that meaningful comments can be given. If NPS does not have a proposal to change the status quo, PRSRA will continue to collaborate with the agencies to enhance sensitive habitats and no evaluation is necessary in this EA.

V. CONCLUSION

Attached to this scoping letter is a PRSRA letter identifying the process anomalies of this current ranch CMP EA. Although PRSRA has pledged to cooperate in an honest process that can result in positive change, PRSRA is still unclear about what triggered this current NEPA process and why it has been initiated by NPS.

Many serious social, cultural, economic and environmental issues have been identified to be reviewed in this process. Some of these issues have already been analyzed by previous NEPA processes. From these processes, management plans have been approved. PRSRA recognizes that PRNS chooses to follow a plan in some cases, and chooses not to follow a plan in other cases. These PRNS decisions can be catastrophic to the ranchers and/or the ranch lands that NPS is entrusted to protect. One example is the PRNS decision to ignore the established purpose of the pastoral zone, a zone set aside by Congress to continue commercial agriculture due to its local importance and cultural value. PRNS, without a public process, removed the Horick family from the pastoral zone and changed the use and the intensity of use of the historic D Ranch from the authorized agricultural use to an unauthorized elk range in the middle of the pastoral zone. Another example is the PRNS decision to follow the 1998 elk management plan that was approved through a NEPA process for several years, only to stop following the plan without another NEPA process.

PRSRA requests that this EA analyze how the agency, NPS and PRNS, will inform PRSRA and the public about any changes to the ranch management plan that results from this process. It should detail a roll-out process with target dates to accomplish any changes. Furthermore, this EA should analyze and share with the public a process for PRSRA and/or the public to initiate if they have reason to believe that the plan that comes out of this process is not being followed by PRNS. A commitment to delegate day-to-day oversight and management decisions to a nonprofit partner with a board of local farm advisors and ranchers would reassure PRSRA that the park service will follow through on the plan approved as a result of this process, a necessity if agriculture in the Historic Ranch Districts is to survive and thrive into the future.

PRNS staff has repeatedly reassured PRSRA that ranchers and farmers will have a meaningful seat at the "NEPA table." We have been told that our voices are important, that we will be invited to special meetings to discuss plan alternatives and to have an active role in the process. PRSRA will participate in an honest and open process in good faith.

Sincerely Yours,

Point Reyes Seashore Ranchers Association

cc: US Senator, Dianne Feinstein
US Senator, Barbara Boxer

US Congressman, Jared Huffman

State Assembly Member, Marc Levine

Marin County Supervisor, Steve Kinsey

Appendix B

March 18, 2016

The Honorable Sally Jewell
Secretary
U.S. Department of the Interior
1849 C Street N.W.
Washington, D.C. 20240

Dear Secretary Jewell:

I write to urge the National Park Service to continue to honor existing ranching and dairy leases at Point Reyes National Seashore in your development of the upcoming Ranch Management Plan. While I am disappointed by the recent lawsuit, I firmly believe that multi-generational ranching and dairying is not only important both ecologically and economically for the area, but also entirely consistent with Congress's intent when it established Point Reyes National Seashore in 1962 and subsequently amended the Act in 1978.

Allowing for continued ranching was a part of the deal Congress struck when it first established Point Reyes National Seashore as a national park. As part of a deal to persuade landowners to sell their property to create the National Seashore in 1962, the federal government assured residents they could continue ranching. And Congress subsequently reaffirmed the importance of agriculture in 1978 when it established the permitting system that now governs the leases.¹ We must keep that promise.

Congress's intent that agriculture continue at Point Reyes has been reflected by various members of the administration throughout the years. Then-Secretary of the Interior Ken Salazar observed in 2012, for instance, that "working ranches are a vibrant and compatible part of Point Reyes National Seashore, and both now and in the future represent an important contribution to Point Reyes' superlative natural and cultural resources." The Secretary then directed the National Park Service to fully consider the values of ranching and farming in future planning efforts.

Point Reyes now has a total of 35 leasing or permitting instruments that allow ranching, of which 29 are for beef cattle and 6 are for dairy cattle. These operations are not only an important cultural and economic underpinning in the area, they also sustain a healthy and well-balanced ecosystem. Sound, sustainable farming practices help with—not hinder—the management of vast grasslands under threat from non-native plants.

Sustainable ranching in the Seashore also provides an excellent opportunity to educate the millions of visitors who come visit each year. In these unique working landscapes, visitors can witness for themselves how locally-produced food reduces greenhouse gas emissions by reducing the distance traveled from farm to table.

I firmly believe that not only must the National Park Service provide for continued ranching, but the National Park Service should do so in a manner that places these ranchers on sound footing. We must provide farmers and ranchers assurance that the land they are investing in today will be there tomorrow for their children, let alone around long enough for them to recoup their investments.

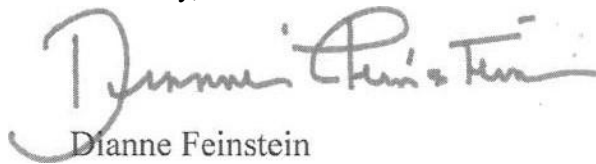
That is why I asked for, and former National Park Service Director Mary Bomar agreed to issue, ten-year leases. That the National Park Service subsequently decided to issue twenty-year leases is another step in the right direction. These types of leases will allow ranchers to amortize the costs of vital capital improvements, like installing fencing and developing water sources for livestock.

I am also acutely aware that this drought has taken its toll on farming in the area. As a result, diversification of crops and income is now more important than ever. The upcoming Ranch Management Plan should allow for some level of agricultural diversification within the special use permit, including small-scale row crop farming, production of different livestock species, and allowance of agricultural processing and sales. Not only would these types of allowances afford ranch families stability, but they would also provide the local community with diversity of local foods.

At a time when climate change highlights the importance of local food sources, we should be applauding, not vilifying, farmers at Point Reyes. I ask that you please keep me and my staff updated as you continue to develop the Ranch Management Plan.

I would like to close with a quote from the National Park Service's General Management Plan of 1980: "There is no better place for man to contemplate his origins, the factors that sustain him, and the threats that may destroy him, than at the edge of the sea." I am now more convinced than ever that this national treasure and its lessons should be preserved for our children.

Sincerely,

A handwritten signature in dark ink, appearing to read "Dianne Feinstein". The signature is fluid and cursive, with a large initial "D" and a long, sweeping underline.

Dianne Feinstein
Dianne Feinstein
United States Senator

Appendix C

United States Department of the Interior

NATIONAL PARK SERVICE
Pacific West Region
333 Bush Street, Suite 500
San Francisco, CA 94104-2828

IN REPLY REFER TO:

IO.B. (PWR-PI)

0 7 APR 2016

The Honorable Dianne Feinstein
331 Hart Building
Washington, DC 20510

Dear Senator Feinstein:

Thank you for your March 18, 2016 letter to Secretary Jewell concerning existing ranching and daily leases at Point Reyes National Seashore. Secretary Jewell has asked that we respond to you on her behalf.

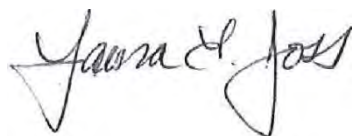
The partnership between the National Park Service and the park ranchers to preserve the vibrant ranching and dairying tradition at Point Reyes National Seashore and adjacent park lands has endured for more than 50 years. Point Reyes National Seashore staff today is proud to work together with the children and grandchildren of those ranching families who sold their lands to the National Park Service decades ago. We are committed to honoring Congress' intent regarding these beef and dairy ranches when it passed and updated Point Reyes National Seashore's enabling legislation, and intend to honor existing ranching and dairy authorizations.

The National Park Service believes that the Ranch Comprehensive Management Plan under development will strengthen both the historic working ranches and the superlative natural and cultural resources of Point Reyes National Seashore. The process is well underway, and we anticipate release of the plan for public review in late 2016, Point Reyes staff has met with your staff throughout this planning process, and will be pleased to continue to keep you and your staff updated as the plan progresses.

In the interim, the park has continued to work closely with park ranchers to support ongoing and new projects and improvements. For example, in summer 2015, the National Park Service received a \$570,000 grant from the State of California to implement water quality best management practices on a number of ranches, thereby supporting the sustainability of these ongoing operations..

We appreciate your continued support of sustainable ranching at Point Reyes National Seashore. If we can provide any further information, please do not hesitate to contact Superintendent Cicely Muldoon at (415) 464-5101.

Sincerely,

A handwritten signature in dark ink, appearing to read "Laura E. Joss". The signature is fluid and cursive, with the first name "Laura" and last name "Joss" clearly distinguishable.

Laura E. Joss

Regional Director, Pacific West Region cc: Point Reyes National

Seashore Superintendent Cicely Muldoon

Appendix D

POINT REYES LIGHT

House committee hears Point Reyes woes

By Anna Guth

05/03/2018

A growing rift among ranchers in the Point Reyes National Seashore over whether to trust the park service to support their ongoing operations took a national stage last week.

During a hearing held by the House Committee on Natural Resources, Representative Jared Huffman sparred with Professor Laura Watt, a member of the recently formed Resilient Agriculture Group based in West Marin, over whether the park's current process to amend the seashore's general management plan will result in the protection of the historic ranches—a goal that they share.

In recent weeks, RAG, a new group of advocates and ranchers, has called for legislation that will guide the general management plan amendment process by clarifying Congress's intent that the working ranches continue.

Yet their tactics, including hiring a Republican lobbyist, have moved others in the ranching community to speak out, disassociating from the group and arguing for a more collaborative approach with the park.

Rep. Huffman, who meets regularly with the ranchers and the park service, challenged Dr. Watt's testimony at the hearing, in which she described an agency bias that has resulted in poor management of the ranchlands.

The congressional hearing, which was held to question the efficacy of the National Environmental Policy Act, was an odd setting for the dispute between Rep. Huffman and Dr. Watt—neither of whom support rolling back environmental regulations, as does the committee's Republican majority.

Dr. Watt is a Sonoma State University professor with a background in environmental planning for federal agencies and the author of "The Paradox of Preservation: Wilderness and Working Landscapes at Point Reyes National Seashore." She told the committee that she believes the park service has injured the Point Reyes ranches through an inconsistent application of NEPA, thereby forcing advocates to look for legislative solutions.

She pointed to the fact that the park service required an environmental impact statement for the now-defunct Drakes Bay Oyster Company to transfer from its reservation of use and occupancy to a special use permit, though the agency had not conducted environmental reviews for ranches to do so.

She also described how permits were cancelled for D Ranch and Rancho Baulines in the early 2000s without an environmental review, despite the major changes in land use that ensued.

Dr. Watt was critical of the park service for issuing a finding of no significant impact for the 1998 elk management plan that allowed for relocating animals from Tomales Point to Limantour, but declining to take any action to resolve conflicts with ranchlands without further review.

Lastly, she questioned why the park service had initiated the ranch comprehensive management plan, with an associated environmental review, to address former Secretary of the Interior Ken Salazar's prompt to extend leases to 20 years.

Dr. Watt characterized these actions as intentionally neglectful of the ranches.

She said the park failed to update the 1980 general management plan and to manage and control the elk population, meanwhile "pushing several permittees to discontinue ranching and accede to the cancellation of their permits, resulting in serious degradation of historic buildings and increases in fire hazard from unmanaged pastures being taken over by brush and weeds."

When it came time for his comments, Rep. Huffman said he appreciated Dr. Watt's research. Still, he said, "It is important to clarify that her testimony, at least in some elements, does not reflect what I believe to be the prevailing view of ranching families in Point Reyes today."

He continued, "It's not a perfect relationship, but in my experience, most ranchers regard the park service as a more or less decent landlord—not the capricious, heavy-handed and anti-agriculture agency that is sometimes portrayed by its critics."

Specifically, Rep. Huffman took issue with Dr. Watt's criticism of the consistency of NEPA analyses, which he said she had suggested was "driven, basically, simply by whether they like a project." That was an oversimplification, he said.

The level of NEPA review depends on all sorts of different requirements in different circumstances, he argued, including that the significance of environmental impacts vary from one situation to another and that in some instances case law requires that even continuing uses require a review.

He also asked Dr. Watt to clarify a few points for the room. She confirmed for him that she does not support waiving or weakening NEPA reviews of timber harvesting or oil and gas drilling, as the committee majority has repeatedly proposed, or the recent legislation to take carbon pollution and climate change out of future NEPA analyses.

On a few other important points, the congressman and the professor were in agreement.

"I agree that the park service has shortcomings: their management of the tule elk—the very successful reintroduction of the tule elk—has created some real challenges for some ranches and dairies, and this has

to be addressed sooner rather than later,” he said. “Senator Feinstein and I are working on this and pushing the park service, and we are going to continue to do that.”

Importantly, he said, “I also agree that in a perfect world, the enabling act of the seashore would be a little more direct about the preservation of the historic ranches and dairies.”

In a conversation with the Light, Rep. Huffman confirmed that he is open to a legislative solution. He said that he has worked on drafting legislative language in close collaboration with Sen. Feinstein, though there is no bill at this time.

“I would only support very carefully crafted clarifying legislation,” he added.

Three members of RAG—Dr. Watt, conservationist Phyllis Faber and rancher Kevin Lunny—wrote a letter to this newspaper in early April in response to a story about the general management plan amendment.

“Both Representative Jared Huffman and Senator Dianne Feinstein are on record repeatedly as to their unwavering support for agricultural uses remaining a permanent part of the Point Reyes working landscape, consistent with Congress’s original intent,” they wrote. “It is incumbent upon them to now move from words of support to collaborative legislative action.”

The letter concluded, “As long as the statutory language remains subject to competing interpretations, these endless planning and litigation battles will continue, resulting in perpetual uncertainty for both ranchers and the seashore-using public.”

RAG has recently announced the hiring of the lobbyist John Doolittle, a former House Republican who came under investigation in the early 2000s for his business relations with lobbyist Jack Abramoff, the prominent lobbyist who defrauded numerous clients.

Chris Carr, RAG’s attorney, worked with Mr. Doolittle previously in litigation that resulted in the park service abandoning a dog management plan in the Golden Gate National Recreation Area after the plaintiffs uncovered the use of private email between park employees.

As far as Mr. Doolittle’s role, Mr. Carr said there is a Republican majority in the House, “and so we brought him on board for obvious reasons. To say the least, it’s helpful to have someone who works with those folks and is familiar with the legislative process.”

He added, “We are talking with everyone—Congressman Huffman, Senator Feinstein, Republicans in the House. We don’t view this as a partisan issue.”

Mr. Carr has also been driving an extensive Freedom of Information Act request to the park service that has so far provided thousands of documents in an interim response. (The vast majority of those

documents were simply pulled from the legislative record from the 2016 lawsuit rather than newly collected.)

Part of a rare influx of letters from the ranching community in this newspaper in the last month, ranchers David Evans and Claire Herminjard wrote a letter to the editor in early April criticizing RAG over what they believe are tactics that threaten the current process to amend the general management plan.

Though a settlement with three environmental groups that sued the park in 2016 mandates that three out of the park's proposed scenarios involve reducing or eliminating ranching and dairying, the agency has also put forward the idea of 20-year leases, increased elk management and operational diversification.

"We understand that these may be well-intentioned citizens and fellow ranchers and we appreciate their support of ranching in the seashore," Mr. Evans and Ms. Herminjard wrote. "That said, we are deeply concerned by their methods and believe their contentious actions are wholly counter-productive to completing the management plan update and securing long-term leases for ranchers."

Their sentiments were echoed a week later by a host of ranching families, including Bill and Nicolette Niman, Bob and Ruth McClure, Dan and Dolores Evans, Julie Rossotti, Betty Nunes, Bob Giacomini, and Tim, Tom and Mike Kehoe.

"We feel the need to step out of comfort zone and make our views on the planning process clear," they wrote. They emphasized their "positive" and "mutually respectful relations" with park staff as well as their commitment to the amendment process.

"We believe promoting exchanges between environmentalists, ranchers and the N.P.S. will lead to a better understanding of the issues around ranching and the environment in the seashore—resulting in a G.M.P.A. that will help the seashore become a model for productive agriculture on public lands throughout the United States, a long-term benefit for all," they wrote.

Mr. Lunny, vice president of the Point Reyes Seashore Ranchers Association, who joined RAG in March, offered his perspective on the reservations regarding the group.

"The people who are hesitant might not yet understand RAG's efforts, our goals and plans fully," he said.

Yet he also added, "The park service hasn't treated everybody the same—there are different experiences and different loyalties. That should be respected, and that's okay."

In speaking with the Light, Rep. Huffman remained critical. "It's very important to me that I have an open dialogue and working relationship with the ranching community, and it's easier to do that when the community is unified," he said. "When there are splinter groups and offshoots that go out and engage in secret lobbying agendas, it can complicate things and it can undermine the trust that is so important for us all to work together."

Burr Heneman, who believes the seashore's enabling legislation and subsequent amendments are ambiguous as to the future of the working ranches in the seashore, agreed with his representative. He is optimistic that the park service plan will provide continued strong support for ranching. Though he acknowledges there may be a time and place for legislation, he is also critical of RAG—in particular its choice for a lobbyist.

“If there is going to be legislation, we all should be working together with our very capable and involved elected representatives,” he said. “I think it can be dangerous to take the RAG path and hire a disgraced, far-right former Congressman to lobby for you in Washington.”

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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.

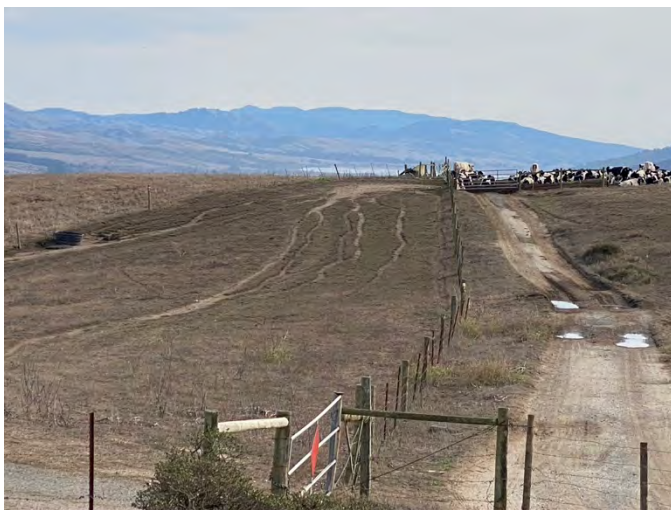
Article 5, Land Resources Sec. 30240(a). “Environmentally sensitive habitat areas shall be protected...” The NPS GMP proposes to implement a “subzoning framework” to designate areas where cattle can be pastured and other areas where “resources” will be protected. Resource protection zones are so scattered 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.

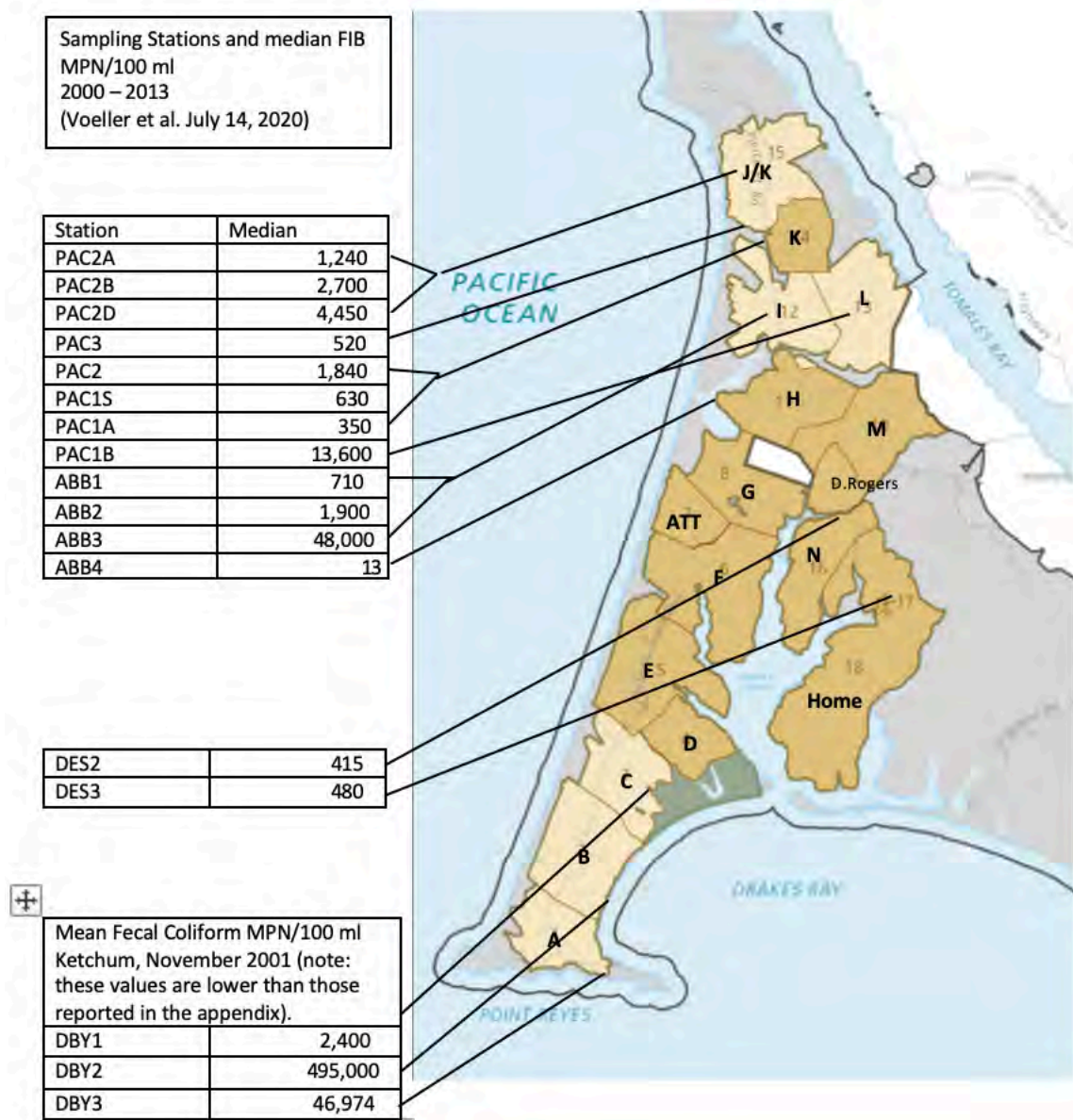


The National Park Service has had ample time to address these issues. Coastal Act consistency should not be considered until the NPS implements a multi-year water monitoring plan and takes the comprehensive corrective actions needed to ensure that coastal waters meet water quality standards for the 2.5 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 ceanthos	RHAMNACEAE		18.2	
<i>Chorolopyron 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> ²	<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> ²	<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	

¹ Names follow The Jepson Manual (Baldwin et al. 2012) unless otherwise noted² 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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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 <eberle16@comcast.net>

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

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

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; Ryan_olah@few.gov; Carey_feierabend@nps.gov

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

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.¹

¹ 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.”²

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.

² <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

Alberti, M. et al. 2011. Research on coupled human and natural systems (CHANS): approach, challenges, and strategies. *Bulletin of the Ecological Society of America* 92:218–228.

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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

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

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

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

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

Protect the Tule Elk AT PRNS

JULIE PHILLIPS <tuleelk@comcast.net>

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

<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

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

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."

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/>

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

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.

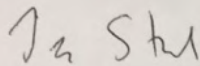
The biodiversity is what makes Point Reyes great, it is what brings in tourists and income from tourism, it is why PRNS is an international destination for birdwatchers. PRNS was bought by the public from the ranchers in 1962. They were generously given 25 years to gradually relocate the ranches. Thanks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

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 signature is written in a cursive, flowing style.

Jeanine Strobel

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.

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

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
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

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

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

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

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

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

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, 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: careyfeierabend@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: 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

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

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 <rscimino@gmail.com>
Sent: Friday, August 7, 2020 3:17 PM
To: Weber, John@Coastal <john.weber@coastal.ca.gov>
Cc: rscimino@gmail.com <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

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: 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>

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