

June 2, 2014

Cicely A. Muldoon
Superintendent
Point Reyes National Seashore
1 Bear Valley Road
Point Reyes, California 94956



**Re: *Point Reyes National Seashore Ranch Comprehensive Management Plan
Environmental Assessment***

Dear Superintendent Muldoon:

Thank you for providing this opportunity for Marin Conservation League to share concerns with the future management of the Seashore ranches through scoping comments on the plan to develop a ranch management plan and an environmental assessment of the plan. Preservation and protection of the National Park's natural and cultural resources, along with maintenance of a healthy and economically viable agricultural community, are key components in Marin County's scenic, historical, cultural and environmental landscape. The combination of these resources also attracts millions of visitors from around the world!

These ranches, in particular the dairies, were an important food source for San Francisco after the Gold Rush and have supplied quality dairy products for the following century and a half. They are a critical part of Marin agriculture and the Marin/Sonoma foodshed. The ranches in the Seashore are among the few, if not the only remaining, examples of California's ocean-side dairying region, a region extending from five to ten miles inland where the grass is best. As such, these ranches are rare representatives of California's rich dairy history that warrant preservation.

We urge that ranch management planning and environmental review proceed and be completed in a timely manner, and that it focus on new methods of managing the ranches in both the Point Reyes and Olema Valley Historic Ranch Districts. Ranchers need the leases in order to obtain financing for operations and capital improvements and so the "next generation" can know whether continuing the family ranching tradition is a realistic career choice. MCL believes that 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, since their presence in the pastoral zone is of fairly recent origin.

Tule elk were extirpated from the Pt. Reyes area more than 150 years ago by a combination of hunting, logging, and ranching. Therefore, until recent years, there were no tule elk to compete for forage or interfere with ranching activities. Allowing a free ranging herd of tule elk in the pastoral zone was rejected as an alternative in the 1998 Elk Management Plan and EA. The Seashore's 2001 "*Year in Review*" 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 Johne's disease." Nevertheless, beginning in about 2002, the park stopped actively managing the

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elk. Efforts to keep the elk out of the pastoral zone ceased. It is because some of the cattle in the pastoral zone may have Johnne's disease that that herd cannot be immediately transported to Wildlands Conservancy wilderness sites, at Wildlands Conservancy expense. 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.

MCL believes that current drought conditions have added a measure of urgency to the Ranch Planning process as it pertains to the immediate problem of free roaming elk; that the park service has an ethical duty to take effective and immediate steps to separate the elk from the cattle on the ranches; and, at the same time, a duty to take humane steps to provide for, and manage the size of, the herd confined at Tomales Point.

Finally, we urge that planners give serious consideration to the body of work on natural resource and agricultural planning and management for Marin County and California that is outlined in the University of California, Cooperative Extension, Marin County comments dated May 21, 2014.

The comments that follow are limited to areas in which we have specific concerns.

Purpose and Need Objectives

Suggest modifying the program objectives to encourage and support diversified agriculture, consistent with historic patterns, as follows:

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.

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.

Restore agricultural activities in areas within the Point Reyes and Olema Valley Historic Ranch Districts where they historically existed and are not otherwise prohibited by law or are no longer ecologically viable because rangeland was replaced by brush or forest long ago.

Ranch Operations/Activities

- Describe measures that would be needed to preserve and protect the ranches in the pastoral zone as part of a "cultural landscape," as defined by the UNESCO Convention on World Heritage Sites, that is, "a diversity of manifestations of the interaction between humankind and its natural environment." In particular, describe

measures that will enable these ranches to thrive, ranches now leased or worked by third, and fourth or fifth generations on the land. These ranches fall into the “continuing landscape” category, in which the ranches are to be managed so as to “retain an active social role in contemporary society closely associated with the traditional way of life, [one] in which the evolutionary process is still in progress.”

- Consider using long-term leasing regulations that could be modeled on the Cuyahoga Valley National Park’s Countryside Initiative. With Cuyahoga as precedent, the park could lease the land directly to ranchers and enter into an agreement for day-to-day management by a nonprofit partner whose board could include farm advisors and other Marin ranchers, who are peers within the local ranching community. In the Cuyahoga example, the nonprofit partner “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.”
- Consider granting “rolling leases,” perhaps based on the Williamson Act model, so that the ranchers always have a reason to invest for the future and the next generation can reasonably make a commitment to stay on or return to the land they know so intimately.
- Consider lease terms that support lessees in the continued adoption of farming practices considered to be ecologically sustainable, including organic and carbon-beneficial practices. In order to encourage a sustainable combination of agricultural land uses, allow a diversity of food and fiber crops, as appropriate in existing soils and water regimes. Provide financial and/or other incentives to ranchers for “best management practices” that provide particular environmental benefits, such as intensive grazing to restore native grasses or application of compost for carbon sequestration.
- Climate and rainfall are predicted to become more variable. In the event of multiple drought years, local water supplies may be unable to maintain pastureland. What measures can be taken to enable the ranches to continue to prosper in the face of climate uncertainty, for example, providing offsetting credits for water source development, and establishing best management practices that improve water use efficiency.
- What diversification and/or value-added activities could be used to bolster the long-term viability of the pastoral zone ranches, in accordance with policies also protecting park resources? For example, agro-tourism, farm stays, crop diversification, roadside markets where the ranchers can sell locally sourced products.
- What models are there to maintain a working ranch if the current rancher ceases operations, through death or retirement, and there are no heirs to carry on? How can the continued operation of a productive ranch be ensured with generational changes,

or if the Park Service wants to discontinue a lease? The relationship that successive generation ranchers in the park have with the land is a key aspect of this cultural landscape. Having family succession plans included in the leases and (NPS) working with a nonprofit partner, with a board of rancher peers and respected farm advisors, to deal with these issues would go a long way to improving the park's relationship with the local community.

- How can grazing be used to reduce fire risk in the Olema Valley? Can productive agriculture be restored in the Olema Valley Historic Ranch District to cost effectively make this area less of a fire risk as well as bring the park into compliance with historic preservation requirements?
- Please consider the benefits to coastal prairie grassland provided by properly managed livestock grazing on ranches within the Historic Ranch Districts where grazing has been removed in the last 15 years or so. Providing rancher stewardship to these coastal prairie livestock pastures at no cost to PRNS is both cost effective and more likely to further the NPS goal of preserving the coastal prairie grasslands than other measures, e.g., controlled burns, mowing.

Management of Elk

- What management models for balancing herd size with available resources exist for tule elk on other California sites? Please describe.
- Define the role of the California Department of Fish and Wildlife in management decisions regarding elk in the Seashore.
- Describe the measures the Park Service takes, and could take, to ensure that the Limantour wilderness area herd survives in a healthy state. What would be an optimal herd size in years with varying climate conditions, and what measures can be instituted to maintain a self-sustaining herd size in the absence of predators and in a landscape with vegetation that is becoming less and less similar to what it was when the elk roamed free in California centuries ago?
- What measures can and should be taken to reduce the number of tule elk in the Tomales and Limantour wilderness area to a self-sustaining size in their wilderness area? Discuss the various possibilities, e.g. culling techniques, fertility control, physically moving elk to another wilderness area, adequate fencing, periodic burns to refresh grassland and improve soil.
- Discuss types of fencing, and the costs, available that would confine elk and keep them out of the pastoral zone ranches.
- What provisions are there to ensure that free roaming elk infected with transmittable diseases do not infect ranch animals, which are confined? This should be considered in relation to varying climate conditions like drought that could exacerbate

the rate at which diseases spread among a population, such as by dehydration or starvation.

- What are best management practices to manage the population size of a confined herd, i.e., the herd confined at Tomales Point, to avoid starvation or dehydration as primary regulating factors?

Vegetation

- While the pastoral rangelands consist largely of long-established, non-native (“European”) grasses and herbs, there are areas where native plant species occur in variant soil and water regimes. To ensure the overall ecological integrity of both the natural and cultural landscape, invasive exotic species removal and native plant community enhancement efforts could be expanded. Individual rangeland management plans could be co-developed between the lessees, the NRCS and park staff in an adaptive management approach to link agriculture and pastoralism to ecological stewardship, restoration, and climate change resilience.
- Noxious invasive plants, such as thistles, are a threat to farming and ranching throughout Marin. What programs or measures can be implemented to control or eliminate noxious invasive plants in different landscapes in pastoral zone ranches? Should the park approve the use of herbicides when they are the best or safest management tools available, e.g., on steep hillsides or with extensive infestations? Should the park allow the no-till drill for seeding? Can managing for noxious invasive plants that endanger ranching and farming be given the highest priority for park resources for dealing with nonnative plants? This is another area where the park’s partnering with a nonprofit that reflects the concerns and experience of the larger Marin farming and ranching community could be helpful in coordinating efforts to abate invasive plants.

Biological Resources and Special-Status Species

The Pt. Reyes Peninsula is an area of extraordinary biological diversity. Almost of half of North American avian species have been observed on the Seashore, and roughly 18 percent of California floral species are found there. Many of these species exist within the otherwise ecologically -modified rangeland ecosystem characteristic of the pastoral zone. We are aware that Seashore staff has monitored species for many years. The EA should identify those plant and animal species that are present within the pastoral areas of the Seashore, describe the viability of populations in relation to the long history of grazing, and analyze how populations might be impacted by changes in grazing regime or other ranch management practices.

Historic Structures

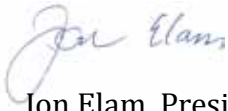
- Describe if, and how, standards for historic structures can be applied so that they

are consistent with maintaining the functionality of the structure. These two purposes should be mutually workable. Consider practicality and costs.

- Consider how the maintenance of ranch roads, and the material used for that purpose in the past, i.e., small on-farm rock resources, Monterey shale, which is softer than rock quarried elsewhere and presents less risk of injury to livestock hooves, would exhibit “significant material evidence of [the landscape’s] evolution over time” as required for World Heritage Site cultural landscapes.

We look forward to reviewing the draft Plan and Environmental Assessment. If you have questions, please address them to Judy Teichman or Sally Gale, Co-Chairs, Agricultural Land Use Committee, or to Nona Dennis, Chair, Parks and Open Space Committee, or Susan Stompe, Chair, Land Use and Transportation Committee, at MCL 415-485-6257 or mcl@marinconservationleague.org.

Sincerely,

A handwritten signature in blue ink that reads "Jon Elam". The signature is written in a cursive style.

Jon Elam, President