

Point Reyes National Seashore  
General Management Plan Amendment  
Draft Environmental Impact Statement Correspondence  
March 2020  
Comments 5027 through 7624

All correspondence received during the public scoping comment period is presented in this and the accompanying machine-readable and text-searchable PDFs. They contain all of the correspondence that was entered into the National Park Service's [Planning, Environment, and Public Comment](#) (PEPC) website, including transcriptions of correspondence received via comment card, postal mail, or hand delivery. These documents have been modified to exclude any personal identifying information of individuals such as street address, email address, or telephone numbers. To search for a desired name or content, open and use the Find tool in your PDF reader. If you don't find the content in this file, download and search for it in the accompanying file. If you have any questions or would like a copy of any correspondence in its original form, please contact Melanie Gunn at 415-464-5131.

Due to limitations on the size of files that can be uploaded to nps.gov, this document has been divided into two 1181-page files (comments 1 through 5026 and comments 5027 through 7624).

Comments 5027 through 7624 are found in this file.

[Download comments 1 through 5026.](#)

#5027

Name: Davis-DeBella, Paula

Correspondence: The National Park Service must use it's authority to Save Pt. Reyes National Seashore for the use of the American Public whose tax dollars paid many of their Ranchers for their lands 47 years. Although many of the Ranchers were paid money years ago and have still continued to ranch, and profit at the expense American Public and all the wildlife on he the lands they are using, their ranching practices do not rise to the level of "Stewardship of the Land. Instead", they are destroying the land and, and some of the ranches are expanding. This behavior was not what was intended by the Federal Government when the leases were grated years ago.

Please do the right thing and assist in restoring Pt. Reyes national Seashore lands by following the 1962 Lease mandates, which would restore the lands. Only Management Plan F would accomplish this.

Thank you,

Paula

#5028

Name: Wald, Johanna

Correspondence: Please adopt Alternative F and abandon Alternative B. The ranchers time is up. Re-turn to the original plan and phase out all ranching. Instead image Point Reyes for the natural values it was created to protect, including wildlife, wildlife habitat + native plants. Do not expand ag uses or the area in which grazing can occur. Do not kill Tule elk and do not issue transferable or grazing leases.

#5029

Name: leroy, olivier

Correspondence: Please protect Tule Elk , do your Job !!!

#5030

Name: Todd, Anya

Correspondence: I care about protecting California's wildlife. I oppose the National Park Service's plan to kill native tule elk and expand commercial agriculture in Point Reyes National Seashore and Golden Gate National Recreation Area. I urge the National Park Service to instead restore the lands for wild animal habitat.

#5031

Name: N/A, N/A

Correspondence: Please keep the native elk alive and intact at the Point Reyes National Seashore. It is so very important to ecosystems, especially now when so many species are being lost globally, that we save all categories of life that we are able to.

#5032

Name: Simon, Dominique

Correspondence: I care about protecting California's wildlife. I oppose the National Park Service's plan to murder native tule elk and expand commercial cattle ranching and agriculture in Point Reyes National Seashore and Golden Gate National Recreation Area. I urge the National Park Service to instead restore the lands for wild animal habitat.

We should prioritize the preservation of our PUBLIC lands and wildlife, not the interests of private ranchers. Commercial cattle ranches have no place on public lands and park land. They cause negative environmental impacts on the park - polluting waterways, causing soil erosion, and harming the many endangered and threatened animals who live on Point Reyes. National parks exist to protect our natural resources and native wildlife. This park should be managed accordingly.

#5033

Name: Serazio, Charlotte

Correspondence: I care about protecting California's wildlife. I oppose the National Park Service's plan to kill native tule elk and expand commercial agriculture in Point Reyes National Seashore and Golden Gate National Recreation Area. I urge the National Park Service to instead restore the lands for wild animal habitat.

We should prioritize the preservation of our public lands and wildlife, not the economic interests of private ranchers. These commercial cattle ranches have serious negative environmental impacts on the park - polluting waterways, causing soil erosion, and harming the many endangered and threatened animals who live on Point Reyes. National parks exist to protect our natural resources and native wildlife. This park should be managed accordingly.

#5034

Name: Serazio, Sandra

Correspondence: I care about protecting California's wildlife. I oppose the National Park Service's plan to kill native tule elk and expand commercial agriculture in Point Reyes National Seashore and Golden Gate National Recreation Area. I urge the National Park Service to instead restore the lands for wild animal habitat.

We should prioritize the preservation of our public lands and wildlife, not the economic interests of private ranchers. These commercial cattle ranches have serious negative environmental impacts on the park - polluting waterways, causing soil erosion, and harming the many endangered and threatened animals who live on Point Reyes. National parks exist to protect our natural resources and native wildlife. This park should be managed accordingly.

#5035

Name: Friedenber, Sarah

Correspondence: Commercial agriculture shouldn't be valued over wildlife!!

I deeply care about protecting California's wildlife. I oppose the National Park Service's plan to kill native tule elk and expand commercial agriculture in Point Reyes National Seashore and Golden Gate National Recreation Area. I urge the National Park Service to instead restore the lands for wild animal habitat.

We should prioritize the preservation of our public lands and wildlife, not the economic interests of private ranchers. These commercial cattle ranches have serious negative environmental impacts on the park - polluting waterways, causing soil erosion, and harming the many endangered and threatened animals who live on Point Reyes. National parks exist to protect our natural resources and native wildlife. This park should be managed accordingly.

#5036

Name: Baxter, Joslyn

Correspondence: I care about protecting California's wildlife. I oppose the National Park Service's plan to kill native tule elk and expand commercial agriculture in Point Reyes National Seashore and Golden Gate National Recreation Area. I urge the National Park Service to instead restore the lands for wild animal habitat.

We should prioritize the preservation of our public lands and wildlife, not the economic interests of private ranchers. These commercial cattle ranches have serious negative environmental impacts on the park - polluting waterways, causing soil erosion, and harming the many endangered and threatened animals who live on Point Reyes. National parks exist to protect our natural resources and native wildlife. This park should be managed accordingly.

#5037

Name: Clifford, Nancy

Correspondence: The preservation of native wild species must take precedence over farming and ranching activities. Grazing negatively affects ecosystems, causing water pollution and soil erosion, spreading invasive species and disease, and harming endangered species.

This land belongs to the wildlife. Grazers are intruders, invasive species and should not be determining policies.

#5038

Name: Menard, Jana

Correspondence: Commercial grazing is what needs to go, not the elk.

#5039

Name: Costa, Gonzalo

Correspondence: The interests of those who want to gain more profits shouldn't be more important than the delicate balance that we share with our environment. We are on the elk and other animals land, not the other way around. This won't end of these farmers are given what they're asking for, once they expand they'll want to expand more. Please show respect to those we share our land with. Thank you.

#5040

Name: N/A, N/A

Correspondence: The elk deserve to live, it's their home.

#5041

Name: Sharp, Ethan

Correspondence: We can't keep paving animals out of the way for the convenience of humans. These elk are no less important than we are. They, and all other animals, have a right to their habitat.

#5042

Name: N/A, N/A

Correspondence: I care about protecting California's wildlife. I oppose the National Park Service's plan to kill native tule elk and expand commercial agriculture in Point Reyes National Seashore and Golden Gate National Recreation Area. I urge the National Park Service to instead restore the lands for wild animal habitat.

We should prioritize the preservation of our public lands and wildlife, not the economic interests of private ranchers. These commercial cattle ranches have serious negative environmental impacts on the park - polluting waterways, causing soil erosion, and harming the many endangered and threatened animals who live on Point Reyes. National parks exist to protect our natural resources and native wildlife. This park should be managed accordingly.

Wyoming has a short Elk season due to there not being many of them. This would make things worse for them!

#5043

Name: Brown, Diana

Correspondence: The primary use of our public lands should be to allow plants and animals to prosper. I urge you to put that goal above commercial enterprises.

#5044

Name: Ashton, Leo

Correspondence: I oppose the National Park Service's plan to kill native tule elk and expand commercial agriculture in Point Reyes National Seashore and Golden Gate National Recreation Area. I urge the National Park Service to instead restore the lands for wild animal habitat.

We should prioritize the preservation of our public lands and wildlife, not the economic interests of private ranchers. These commercial cattle ranches have serious negative environmental impacts on the park - polluting waterways, causing soil erosion, and harming the many endangered and threatened animals who live on Point Reyes. National parks exist to protect our natural resources and native wildlife. This park should be managed accordingly.

#5045

Name: Kirstin, Kristy

Correspondence: All non-human species were created, given breath to, and are Owned by GOD. NOT YOU. You have no right to kill, hunt, or abuse, ANY of GOD's creatures. They were made by GOD to enjoy their lives and are a gift for humans to enjoy. STOP worshipping MONEY. STOP murdering GOD's creatures. THEY ARE NOT YOURS.

#5046

Name: N/A, N/A

Correspondence: I care about protecting California's wildlife. I oppose the National Park Service's plan to kill native tule elk and expand commercial agriculture in Point Reyes National Seashore and Golden Gate National Recreation Area. I urge the National Park Service to instead restore the lands for wild animal habitat.

We should prioritize the preservation of our public lands and wildlife, not the economic interests of private ranchers. These commercial cattle ranches have serious negative environmental impacts on the park - polluting waterways, causing soil erosion, and harming the many endangered and threatened animals who live on Point Reyes. National parks exist to protect our natural resources and native wildlife. This park should be managed accordingly.

#5047

Name: korel, melek

Correspondence: I care about protecting California's wildlife. I oppose the National Park Service's plan to kill native tule elk and expand commercial agriculture in Point Reyes National Seashore and Golden Gate National Recreation Area. I urge the National Park Service to instead restore the lands for wild animal habitat.

We should prioritize the preservation of our public lands and wildlife, not the economic interests of private ranchers. These commercial cattle ranches have serious negative environmental impacts on the park - polluting waterways, causing soil erosion, and harming the many endangered and threatened animals who live on Point Reyes. National parks exist to protect our natural resources and native wildlife. This park should be managed accordingly.

#5048

Name: N/A, N/A

Correspondence: All wildlife must be permitted to show earth's compassion

#5048

Name: Beyer, Janice

Correspondence: Please do not destroy these beautiful elk that belong to all Americans in favor of agricultural private interests.

#5049

Name: McGee, Carolita

Correspondence: Please adopt Alternative F, which would discontinue farming and ranching opportunities in the park and expand visitor opportunities. The preservation of native wild species must take precedence over farming and ranching activities. Grazing negatively affects ecosystems, causing water pollution and soil erosion, spreading invasive species and disease, and harming endangered species.

#5050

Name: Gates, Genevieve

Correspondence: I care about protecting California's wildlife. I oppose the National Park Service's plan to kill native tule elk and expand commercial agriculture in Point Reyes National Seashore and Golden Gate National Recreation Area. I urge the National Park Service to instead restore the lands for wild animal habitat.

We should prioritize the preservation of our public lands and wildlife, not the economic interests of private ranchers. These commercial cattle ranches have serious negative environmental impacts on the park - polluting waterways, causing soil erosion, and harming the many endangered and threatened animals who live on Point Reyes. National parks exist to protect our natural resources and native wildlife. This park should be managed accordingly.

#5051

Name: Sambrano , Rocio

Correspondence: Please don't kill the Elk! It's madness!

#5052

Name: Willner, Marcia

Correspondence: If wolves & cougars were given free reign to roam their natural habitats you probably wouldn't think you need to cull a deer population.

Please, let nature be nature. Do not kill deer. Stop poisoning & trapping their natural predators for farmers. There are no more spare animals for random or targeted killings.

If you stop allowing the killing if wolves, bobcats & cougars the need for culls would end. But you already know this.

#5053

Name: oshea, maureen

Correspondence: How come domestic animals get precedence over native animals? This does not sound right at all. Please reconsider this "solution" and come up with a more viable one. Thank you

#5054

Name: Berry, Nina

Correspondence: I care about protecting California's wildlife. I oppose the National Park Service's plan to kill native tule elk and expand commercial agriculture in Point Reyes National Seashore and Golden Gate National Recreation Area. I urge the National Park Service to instead restore the lands for wild animal habitat.

We should prioritize the preservation of our public lands and wildlife, not the economic interests of private ranchers. These commercial cattle ranches have serious negative environmental impacts on the park - polluting waterways, causing soil erosion, and harming the many endangered and threatened animals who live on Point Reyes. National parks exist to protect our natural resources and native wildlife. This park should be managed accordingly.

#5055

Name: N/A, N/A

Correspondence: I do not believe that we should be killing any Tule Elk (Native or not) to create space for more ranch animals to be raised for food. I understand the ranchers want this space, however, our relationship with food needs to change before we start killing more other animals to make space to raise animals for food. Point Reyes is a National parkland it and the species that live there need to be treated as such. Are we going to simultaneously pass a bill to lower the amount of non-pasture raised animals allowed to hit the supermarkets in CA like we did with Chickens? Otherwise, what is the point? I am not seeing a shortage of pasture-raised animals for sale. If people want to eat that quality food it is available now.

**BE A LEADER CALIFORNIA - DON'T KILL ELK TO MAKE SPACE TO RAISE ANIMALS FOR FOOD!!**

#5056

Name: Gottlieb, Rabbi Lynn

Correspondence: Have you heard of climate devastation, and you want to contribute to it?

I am someone who spends a lot of time outdoors at PT Reyes National Seashore. The tule elk are a beautiful part of the park, and people come from around the world to see them. I honestly do NOT see any issue with the elk over-running the cattle there, and I hike all over the park! I care about protecting California's wildlife. I oppose the National Park Service's plan to kill native tule elk and expand commercial agriculture in Point Reyes National Seashore and Golden Gate National Recreation Area. I urge the National Park Service to instead restore the lands for wild animal habitat. We should prioritize the preservation of our public lands and wildlife, not the economic interests of private ranchers. These commercial cattle ranches have serious negative environmental impacts on the park - polluting waterways, causing soil erosion, and harming the many endangered and threatened animals who live on Point Reyes. National parks exist to protect our natural resources and native wildlife. This park should be managed accordingly.

#5057

Name: Cofresi, Shirley

Correspondence: We should be protecting our lands and wildlife's habitat! I oppose the National Park Service's plan to kill native tule elk and expand commercial agriculture in Point Reyes National Seashore and Golden Gate National Recreation Area. I urge the National Park Service to instead restore the lands for wild animal habitat.

Point Reyes National Seashore is for the public, not ranchers or other means of making money off the backs of our wildlife! Cattle are the most destructive animals, that's a fact. Water ways, lands, and air quality decreases whenever cattle or domestic herds are allowed to graze. A PROVEN FACT!

Your job is protecting our lands, air, waterways, and WILDLIFE! Do your job!

#5058

Name: Howard, Sharon

Correspondence: We lived in California for 5 years and drove from Folsom to Pt Reyes to show the elk to visiting family and friends ever year. These are beautiful as animals and found only here. Let them alone and commercial enterprise and ranchers need to realize they ate destroying wildlife habitat. There is no need for this.

#5059

Name: N/A, N/A

Correspondence: I care about protecting wildlife every where in this beautiful country and feel strongly about protecting OUR National Parks. It does not make sense to kill native tule elk for the safe of commercial agriculture in the Point Reyes National Seashore and Golden Gate National Recreational Ares. National parks exist for the protection of wildlife and for all of us to enjoy, not to be used for a few to make a profit. Please restore these lands for wild life habitat. Thank you.

#5060

Name: Dameron , Susan

Correspondence: Do not consider a plan that would permit elk to be killed while allowing the expansion of agricultural activities.

#5061

Name: Jammal, Anthony

Correspondence: Please value the wildlife such as the elk over farming and agriculture development. We need to preserve Point Reyes natural beauty and charm. Without it this area and the environment will suffer leading to a lower quality of life for its residents.

#5062

Name: B, A

Correspondence: Please don't allow this to take place and keep the elk safe

#5063

Name: N/A, N/A

Correspondence: Don't prioritize agriculture over the environment and wildlife. Point Reyes is a national treasure, and I've enjoyed visiting to see the elk and beautiful natural setting. They need to be protected and preserved, not further abused by ranchers.

I care about protecting California's wildlife. I oppose the National Park Service's plan to kill native Tule elk and expand commercial agriculture in Point Reyes National Seashore and Golden Gate National Recreation Area. I urge the National Park Service to instead restore the lands for wild animal habitat.

We should prioritize the preservation of our public lands and wildlife, not the economic interests of private ranchers. These commercial cattle ranches have serious negative environmental impacts on the park - polluting



waterways, causing soil erosion, and harming the many endangered and threatened animals who live on Point Reyes. National parks exist to protect our natural resources and native wildlife. This park should be managed accordingly.

#5064

Name: Nunez, Priscilla

Correspondence: Hi, I urge you to adopt Alternative F, which would discontinue farming and ranching opportunities in the park and expand visitor opportunities. The preservation of native wild species must take precedence over farming and ranching activities. Remind it that grazing negatively affects ecosystems, causing water pollution and soil erosion, spreading invasive species and disease, and harming endangered species.

#5065

Name: MacGregor, Steven

Correspondence: I care about protecting California's wildlife. I oppose the National Park Service's plan to kill native tule elk and expand commercial agriculture in Point Reyes National Seashore and Golden Gate National Recreation Area. I find this act absolutely deplorable and I urge the National Park Service to instead restore the lands for wild animal habitat.

I find even the thought of this awful and the National Park Service should truly be ASHAMED of itself for even contemplating this idea.

We should prioritize the preservation of our public lands and wildlife, not the economic interests of private ranchers. These commercial cattle ranches have serious negative environmental impacts on the park - polluting waterways, causing soil erosion, and harming the many endangered and threatened animals who live on Point Reyes. National parks exist to protect our natural resources and native wildlife. This park should be managed accordingly.

#5066

Name: Meyer, Jennifer

Correspondence: I think the best alternative for dealing with elk and cows is to build fences to separate them. I do not believe in killing any of the elk herd.

#5067

Name: Soares, David

Correspondence: This is a National Park, not farm, or range land. No culling of wildlife should be allowed that is not related to health and well being of the animals and/or habitat, period!

Thank you

#5068

Name: infield, maryan

Correspondence: This is a complete disaster for our environment-please reconsider

#5069

Name: Kilgore, Anne

Correspondence: This is absolutely appalling that my tax money is being used to pay people to kill animals so that ranchers (who apparently believe that are entitled to free stuff/help/land/benefits, otherwise know as welfare) can

benefit. If a company or entrepreneur can't make it financially without the government interfering that is not capitalism.

To be clear I don NOT want wildlife to be killed for anyone, much less ranchers who obviously believe they are entitled to my money. If they can't make it, then they need to out of business.

I do not understand why ranchers believe they deserve so much help while they do nothing for others. I am truly disgusted.

Parks are for the American people to enjoy, not for welfare ranchers to make a profit.

#5070

Name: infield, maryan

Correspondence: Please adopt alternative F

#5071

Name: Resa, Gloria

Correspondence: I care about protecting California's wildlife. I OPPOSE the National Park Service's plan to kill native tule elk and expand commercial agriculture in Point Reyes National Seashore and Golden Gate National Recreation Area.

We should prioritize the preservation of our public lands and wildlife, NOT the economic interests of private ranchers. Thank you for speaking up for the elk who call Point Reyes home!

#5072

Name: N/A, N/A

Correspondence: I care about protecting California's wildlife. I oppose the National Park Service's plan to kill native tule elk and expand commercial agriculture in Point Reyes National Seashore and Golden Gate National Recreation Area. I urge the National Park Service to instead restore the lands for wild animal habitat.

We should prioritize the preservation of our public lands and wildlife, not the economic interests of private ranchers. These commercial cattle ranches have serious negative environmental impacts on the park - polluting waterways, causing soil erosion, and harming the many endangered and threatened animals who live on Point Reyes. National parks exist to protect our natural resources and native wildlife. This park should be managed accordingly.

#5073

Name: Martins-Fernandes, Ana-Paula

Correspondence: I care about protecting California's wildlife. I oppose the National Park Service's plan to kill native tule elk and expand commercial agriculture in Point Reyes National Seashore and Golden Gate National Recreation Area. I urge the National Park Service to instead restore the lands for wild animal habitat.

We should prioritize the preservation of our public lands and wildlife, not the economic interests of private ranchers. These commercial cattle ranches have serious negative environmental impacts on the park - polluting waterways, causing soil erosion, and harming the many endangered and threatened animals who live on Point Reyes. National parks exist to protect our natural resources and native wildlife. This park should be managed accordingly.

#5074

Name: Cimino, Christine

Correspondence: I urge you to adopt Alternative F, which would discontinue farming and ranching opportunities in the park and expand visitor opportunities. The preservation of native wild species must take precedence over farming and ranching activities. Grazing negatively affects ecosystems, causing water pollution and soil erosion, spreading invasive species and disease, and harming endangered species.

#5075

Name: Little, Jacqueline

Correspondence: Please protect California's wildlife! I oppose the National Park Service's plan to kill native tule elk and expand commercial agriculture in Point Reyes National Seashore and Golden Gate National Recreation Area. I urge the National Park Service to instead restore the lands for wild animal habitat.

We should prioritize the preservation of our public lands and wildlife, not the economic interests of private ranchers. These commercial cattle ranches have serious negative environmental impacts on the park - polluting waterways, causing soil erosion, and harming the many endangered and threatened animals who live on Point Reyes. National parks exist to protect our natural resources and native wildlife. This park should be managed accordingly.

#5076

Name: Welker, Jeanne

Correspondence: PLEASE, Please adopt Alternative F.....

#5077

Name: Johnson, Jo

Correspondence: Please protect the elk at Point Reyes!

#5078

Name: Doyle, Gil

Correspondence: I care about protecting California's wildlife. I oppose the National Park Service's plan to kill native tule elk and expand commercial agriculture in Point Reyes National Seashore and Golden Gate National Recreation Area. I urge the National Park Service to instead restore the lands for wild animal habitat.

We should prioritize the preservation of our public lands and wildlife, not the economic interests of private ranchers. These commercial cattle ranches have serious negative environmental impacts on the park - polluting waterways, causing soil erosion, and harming the many endangered and threatened animals who live on Point Reyes. National parks exist to protect our natural resources and native wildlife. This park should be managed accordingly.

Get a clue and do your job.

#5079

Name: Keenan, Kathy

Correspondence: Rather than expanding ranching and eliminating the native tule elk, which do not destroy the

environment, please adopt measures that will expand wildlife habitat, expell ranching (which harms the environment), and increase visitor resources.

#5080

Name: G., Laura

Correspondence: The national Park service should focus on protecting parks, their Flora, and fauna. The national Park service should not defer to corporations, companies, businesses or ranchers. That is not their responsibility. Protect the land, the plants and the animals.

#5081

Name: Brewer, Anna

Correspondence: Please protect California's wildlife. I oppose the National Park Service's plan to kill native tule elk and to expand commercial agriculture in Point Reyes National Seashore and Golden Gate National Recreation Area. This is wildlife area. I urge the National Park Service to instead restore the lands for wild animal habitat.

We should prioritize the preservation of our public lands and wildlife, not the economic interests of private ranchers. These commercial cattle ranches have serious negative environmental impacts on the park - polluting waterways, causing soil erosion, and harming the many endangered and threatened animals who live on Point Reyes. National parks exist to protect our natural resources and native wildlife. This park should be managed accordingly.

#5082

Name: Tintle, Bob

Correspondence: I expect the NPS to manage the Point Reyes National Seashore as a park not as for-profit agricultural enterprises. As part of the national park system, the seashore should be managed for the benefit of all not for the profit of a few ranchers and farmers.

For this reason and more, I urge the NPS to adopt Alternative F, which would discontinue ranching and farming opportunities in the park and expand visitor opportunities. I believe that preservation of native wild species should take precedence over ranching and farming activities. Need I remind you that grazing negatively impacts ecosystems causing soil erosion and water pollution, harming endangered species, and spreading invasive organisms and disease.

Thank you for allowing me to express my values.

#5083

Name: Adkins, Susie

Correspondence: Please do not kill these Elks just to please the ranchers. Too many of our wildlife are being killed because us humans are greedy and sometimes we could care less about anything or one else. The Elks are God's creation and therefore we should do what we can to protect them. Thank you in advance for saving them.

#5084

Name: Egan, Michele

Correspondence: I strongly oppose the National Park Service's plan to kill the Tule Elk of Point Reyes. I support non-lethal means of managing the herd either birth control or moving some members of the herd to another herd or establishing a new herd on other national park properties. I also support the ongoing presence of the existing ranches within the Point Reyes area. The ranches were there first and can be good stewards of our land, operating their agricultural enterprises AND preserving wildlife. That being said, those ranches should be given every tool to

be good stewards. That does not involve culling the herd of Tule Elk. The park service can not shoot it's way out of these challenges. Try birth control on the herd and/or relocation. Please do not kill the Tule elk. Sincerely  
Michele Egan

#5085

Name: Shortle-Turner, Tracy

Correspondence: Help protect the Elk!

#5086

Name: Mcgrath, Kelly

Correspondence: Please dont kill any Tule Elk. There are other solutions to this issue. Look for them. Thank you.

#5087

Name: SHIELDS, ROBERTA

Correspondence: Please accept this as a heartfelt, rational and substantiated comment about the harm that commercial ranching can inflict on wildlife and wild places. There is absolutely no reason why any number of native tule elk should be sacrificed to allow cattle to graze or otherwise infringe on land that should be the realm of wildlife not commercial "crops". That said, I don't think I can state my opinion and concerns any better than is done in the following statement: I care about protecting California's wildlife. I oppose the National Park Service's plan to kill native tule elk and expand commercial agriculture in Point Reyes National Seashore and Golden Gate National Recreation Area. I urge the National Park Service to instead restore the lands for wild animal habitat.

We should prioritize the preservation of our public lands and wildlife, not the economic interests of private ranchers. These commercial cattle ranches have serious negative environmental impacts on the park - polluting waterways, causing soil erosion, and harming the many endangered and threatened animals who live on Point Reyes. National parks exist to protect our natural resources and native wildlife. This park should be managed accordingly.

#5088

Name: Wagner, David

Correspondence: I feel as if this plan is short-sighted and favors subsidized farmers and ranchers rather than wildlife.

#5089

Name: Friedmann, Michael

Correspondence: Please be kind to all the Animals and the Environment this is their Planet too, Thank You Very Much.

#5090

Name: Rice, Janet

Correspondence: I care about protecting California's wildlife. I oppose the National Park Service's plan to kill native tule elk and expand commercial agriculture in Point Reyes National Seashore and Golden Gate National Recreation Area. I urge the National Park Service to instead restore the lands for wild animal habitat.

We should prioritize the preservation of our public lands and wildlife, not the economic interests of private ranchers. These commercial cattle ranches have serious negative environmental impacts on the park - polluting waterways, causing soil erosion, and harming the many endangered and threatened animals who live on Point

Reyes. National parks exist to protect our natural resources and native wildlife. This park should be managed accordingly.

#5091

Name: Dundas, Ruth

Correspondence: \*Note - This is a COPY of a hand delivered comment with printed photos referred to in the text. There is no possibility for submission of photos online.

I DO NOT SUPPORT ALTERNATIVE B OF THE EIS GENERAL MANAGEMENT PLAN BECAUSE:

ENVIRONMENTAL VIOLATIONS " Creating a new ranchland zone encompassing one third of the Point Reyes National Seashore violates the mission of the National Seashore as written in the original 1962 Statute to provide for the maximum protection, restoration, and preservation of the natural environment.

Cattle and dairy ranching have contributed to the environmental degradation of the natural environment, including plant and wildlife:

" During the four years I worked in Point Reyes as a plant ecologist, I was not the only employee who believed the ranches had unacceptable environmental and social impacts. Barbara Moritsch Vegetation Management Branch Chief Point Reyes National Seashore

" The livestock polluted waters of Point Reyes National Seashore rank in the top 10 percent of US locations most contaminated by feces indicated by E. coli bacteria according to a report published by the Center for Biological Diversity

" The Park Services 2013 Coastal Watershed Assessment for Point Reyes National Seashore documented numerous examples of cattle ranching polluting water resources in the park and identified dairies and ranches as a principal threat to water quality.

" I submit 5 Photos as EXHIBIT A, taken in early September, 2019 which support this statement. Photos 1-3 from A ranch, B Ranch and E ranch show degradation of soil due to concentrated cattle movements. Photos 4-5 show water pollution with algal blooms on B Ranch where cattle come to water.

MAINTENANCE OF HISTORIC BUILDINGS MISLEADING AND INADEQUATELY PROVIDED FOR " Alternative B also violates the legislation of 1976, amendment directive to administer Point Reyes 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, and based upon, and supportive of the maximum protection, restoration, and preservation of the natural environment within the area (16 U.S.C. § 459c-6).

" The ranches have been listed on the National Register of Historic Places. The Ranchers themselves have been primarily responsible for maintaining their infrastructure including the historic homes and barns and this has been a failure. Only where the NPS has stepped in to provide skilled workers and funding has there been proper maintenance as in the case of the large Barn at the Home Ranch. There is no provision in the EIS to change this. The leases in the EIS appendices give the Ranchers primary responsibility for maintenance. The existing barns and home structures are an embarrassment to the National Park and the public visitors. The stench from Historic Ranch A is so overpowering at times, it can be smelled from Chimney Rock, where I work on Winter weekends. The abandoned cars and trailers being used as domiciles are not in keeping with Historic Place designation.

" It is the Historic BUILDINGS AND INFRASTRUCTURE that have been given Historic status, NOT THE CATTLE. This is MISLEADING to the public. The Cattle are not covered by the National Register of Historic Places.

" The reason for giving Ranchers 20 year leases is so that they feel that they are making a reasonable investment in keeping up their property. However, without owning the property to see a return on their investments, and the lack of assurance that they can continue ranching after the 20 year lease period is up, the Ranchers will not invest the needed funds into the preservation of historic buildings and agriculture. This concern was voiced by the Ranchers at the meeting of the Marin Conservation League at the Lagunitas School on September 5, 2019.

" There are many Historic Farms and Ranches in Marin County, such as the Jensen Ranch in Tomales, the Gale Ranch in Chileno Valley, the Burbank Ranch in Tomales, and the Parks Ranch in Tomales to name a few that predate most of the Point Reyes Ranches. These ranches are all privately owned and therefore privately maintained, with some help from MALT and similar organizations. There is no precedent for Ranchers paying for the cost of restoration while leasing land, even with 20 year leases. The investment is too great to justify.

" The Point Reyes Ranchers pay \$7-9 AUM for their grazing rights when average grazing fees in Marin County are \$15-20 AUM. The Ranchers also pay no property taxes. This is an unfair advantage to neighboring Marin County Ranchers, and should provide for ample funds for preserving buildings and infrastructure. However, over the years, the ranch buildings and infrastructure of the PR Ranches have suffered from neglect and disrepair. " No mention is made in the General Management Plan of the high cost of ranching to the Park and the Public. Marin County spent \$250,000 in legal fees of ranchers managed by PRNS in 2017 alone. The cost of the EIS so far is close to \$1,000,000. And there is no proposed budget for the hiring of staff and qualified professionals to oversee the ranching enterprises proposed in Alternative B.

" The responsibility of historic preservation and educational interpretation is the mandate of the NPS, not overseeing Commercial Ranching. The Park budget is so stretched that the educational services already present have been greatly curtailed. I see this as a volunteer. Our equipment is old and has not been replaced over the years. We have only one paid NPS ranger to oversee the work of the 75 volunteers that provide (for free) the educational interpretive services needed to handle the thousands of visitors we manage at the Outer Point in the winter months. There is no extra staff or financial resources to handle overseeing Ranchers. This is not addressed in the Proposed General Management Plan.

" There is no provision for ACCOUNTABILITY and TRANSPARENCY in the General Management Plan. Lease agreements, Regular Health Inspections and Inspections of Buildings with Updated Maintenance reports should be on the Parks website for the Public to access easily, as it is Public land that is supporting the Ranchers. This lack of transparency, at present and in the planning for the future, indicates the lack of staffing and funding for the NPS to adequately oversee the Ranching operations.

" One of the most prominent examples of the lack of resources for management of historic ranching buildings is the Home Ranch. The Rancher moved out two years ago and the park has let the buildings fall apart. The main house is overgrown with weeds and the fences are propped up with branches. This is the oldest and most historic Ranch in the Seashore, built in 1857, and yet it is the most disheveled and abandoned. I submit EXHIBIT B, 6 photos showing the current state of this most Historic of the ranches in Point Reyes.

" I also submit EXHIBIT C - 6 photos showing the disheveled condition of the buildings at B Ranch (showing a Trailer used for housing), A Ranch (with broken down cars in the yards) and the poor condition of the cattle guards at A Ranch, which have not been maintained for many years. The roads to the Outer Point are in terrible condition partly due to large dairy trucks and farm machinery that regularly use these roads.

**ELIMINATION BY LETHAL MEANS OF THE TULE ELK** " The Tule Elk are native to Point Reyes. The Cattle are not. Prioritizing commercial cattle ranching over the Wildlife is a violation of the founding mission of the National Seashore. " There are currently 660 Tule Elk in the Park. There are 5,196 cattle on land managed by the PRNS. " Tule Elk eat 9 lb. per day of dry forage. An average Adult Holstein eats 50 pounds daily of dry forage. " Cattle in the PRNS drink over 156,000 gallons of water per day. Yet 250 Tule elk were left to die in Pierce Point behind the fence that keeps them out of the range of the cattle. There were no cattle who died of the drought in the same year at PRNS.

These facts are not specified in the General Management Plan. And indicate that the Proposal B to cull the Tule Elk by lethal means is in violation of the founding mission of the PRNS.

DIVERSIFICATION " Johnes disease is a lethal disease threatening to all ruminants, including pigs, sheep, goats, cattle and elk. It is possible and perhaps likely that the JOHNES disease present in the Tule Elk came from the Cattle. Spreading manure on the fields may be spreading the disease as it is spread through fecal material and can lie dormant for 18 months. Bringing in additional species of animals may further spread the disease. " The idea of diversification opens up the possibility of grandfathering in the future of more farming activities. This could lead to further degradation of the environment. " There is no plan in the EIS to deal with predation by wild animals such as bobcats, mountain lions, weasels and coyotes on new animals such as chickens, sheep and goats, who are more vulnerable than cattle. This could lead to further problems with Ranchers vs. the Parks mission.

SUCCESSION " The three stage succession outlined in the Alternative B proposal is contrary to the founding legislation of the Point Reyes National Seashore. The original legislation provided for fair market price (\$340 million in today's value) paid to 27 ranchers for the purchase of their ranch lands. The 17 remaining families were allowed to continue ranching for their lifetime or 25 years, whichever was longer. It has now been 57 years and 31 ranches with 24 families are considered legacy families. Proposal B allows these 24 families to continue ranching for the 20 year lease period, and their families or neighboring ranchers to take over their leases if they decide to give them up. The third level of Succession in Proposal B is open to proposals from the community at large if the original families or neighbors do not want to take up the leases. This is in violation of the founding mission and even the enabling legislation of 1978 which entitled only the current families to continue ranching.

" In effect, Proposal B, assures that one third of the National Park will allow ranching to continue, whether of historical value, or not. And whether the damage to the environment and wildlife violates the Parks founding mission or not:

" Except for property which the Secretary specifically determines is needed for interpretive or resources management purposes of the seashore, the owner of improved property or of agricultural property on the date of its acquisition by the Secretary under sections 459c to 459c-7 of this title may, as a condition of such acquisition, retain for himself and his or her heirs and assigns a right of use and occupancy for a definite term of not more than twenty-five years, or, in lieu thereof, for a term ending at the death of the owner or the death of his or her spouse, whichever is later. " Enabling Legislation, Point Reyes National Seashore, 16 U.S. Code § 459c, September 16, 1962

## IMPACT ON VISITORS TO THE PARK

The EIS and General Management Plan makes no mention of the impact of the ranching on tourist visits to the Park and to the local economy.

" The number of annual visitors to Point Reyes in 2017 was 2,456,669. " 88.6% of annual visitors from 2017 were non-local " The economic value attributed to tourism at PRNS in 2017 was \$132,388,900 " Tourists come to Point Reyes for the purposes stated in the founding mission: recreational, educational, historic preservation, interpretation and to enjoy the environment and the wildlife. Tourists do not come to the National Seashore to see Commercial Cattle Ranching. There are 255 agricultural operations in Marin comprising 50 percent of Marin County. There is only one National Park.

MITIGATION AND RESTORATION IMPACT NOT ADEQUATELY ADDRESSED " None of the Parks Alternative Proposals discuss timelines or costs for mitigating the costs of addressing water pollution from cattle manure runoff, soil degradation and erosion from grazing cattle, impact to plant and wildlife, and pollution from greenhouse gases and Confined Animal Feeding Operations (CAFOs). There is no budget nor scope of focus on where to address staff and funds for a plan of action, and what the benefit would be to wildlife, water, climate change mitigation, or public visitation and use. This should be the core of an Environmental Impact Statement, especially dealing with Ranching in a National Park Wildlife Environment.



SUPPORT FOR ALTERNATIVE F, WITH REVISIONS " The only Alternative in the EIS General Management Plan which adheres to the founding mission of the Park, and supports environmental and wildlife over Commercial Ranching concerns, is F, with the provision of eliminating Ranching over a five-year period. But Alternative F has not seen the attention that Alternative B has, and needs revisions including the following: " A thorough Environmental Plan needs to be an integrated part of the Proposal. A budget and scope of work needs to be included, including impact to wildlife and plant life and assessment of and plans to restore the environmental damage caused by 150 years of cattle ranching.

" A plan of action with scope of work and budget needs to address the restoration and maintenance of the historic buildings that the NPS decides to save in its mandate of Historic and Cultural Education. An excellent example of this is seen at Pierce Point. Visitors can see the historic buildings, read the interpretive panels and come away with a very good idea of what dairy farming was like at the Historic Pierce Point Ranch. Historic buildings could likewise be repurposed for visitor services and much needed Park staff housing.

" There are many examples of Historic Ranch preservation and Educational and Cultural Resources throughout the National Park System. An excellent example is the Fruita Ranch at Capital Reef National Park, where a few livestock are kept and the apple orchards are maintained, along with well-kept historic buildings which house concessions and museums open to the public. The public can even pick apples in the orchard for a small fee. Everyone leaves Capital Reef with an understanding of what ranching was like in that Valley. This is in keeping with the mission and mandate of the NPS.

" If the Park is no longer embroiled in legal battles with the local community, environmental organizations and public at large, those funds could be used for more adequate staffing and funding of visitor programming in keeping with the National Parks mission: 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.

#5092

Name: Adler, Kini

Correspondence: The National Park Service is the first, last and only defense of protection against everything, but especially the Trump Administration, which is hellbent on opening up National and Public lands to oil, gas and coal devastation, damning wildlife and national resources forever. Please take your commitment to protect our lands very seriously because this administration sure doesn't. Between Interior Secretary David Bernhardt and EPA head Andrew Wheeler, Trump has positioned the federal government to rape and pillage our natural heritage, with the blessing of Republicans and an ineffective Democratic Senate minority. You are the last defense. We will work with you to protect our lands!!!

Thank you.

#5093

Name: Jennings , Kathleen

Correspondence: My visit to Point Reyes left a lasting impression on me. The wildlife there was magestic. The deer seemed healthy and contented. They are a national.treasure. Please do not change or interfere with the lives of these creatures. Leave Poknt Reyes as it is. Thank you.

#5094

Name: Wood, Peter

Correspondence: Let the Elk live in peace!

I care about protecting California's wildlife. I oppose the National Park Service's plan to kill native tule elk and expand commercial agriculture in Point Reyes National Seashore and Golden Gate National Recreation Area. I urge the National Park Service to instead restore the lands for wild animal habitat.

We should prioritize the preservation of our public lands and wildlife, not the economic interests of private ranchers. These commercial cattle ranches have serious negative environmental impacts on the park - polluting waterways, causing soil erosion, and harming the many endangered and threatened animals who live on Point Reyes. National parks exist to protect our natural resources and native wildlife. This park should be managed accordingly.

#5095

Name: Chase, Felicia

Correspondence: Please don't kill elk at a Point Reyes National Reserve.

#5096

Name: lacy, sharon

Correspondence: please adopt Alternative F, which would discontinue farming and ranching opportunities in the park and expand visitor opportunities. The preservation of native wild species must take precedence over farming and ranching activities. Grazing negatively affects ecosystems, causing water pollution and soil erosion, spreading invasive species and disease, and harming endangered species.

thank you for protecting the life left on this radiant planet.. sharon j. lacy

#5097

Name: Maughan, Lorrin

Correspondence: I vehemently oppose the National Park Service's plan to kill native tule elk and expand commercial agriculture in Point Reyes National Seashore and Golden Gate National Recreation Area. I urge the National Park Service to instead restore the lands for wild animal habitat.

We must prioritize the preservation of our public lands and wildlife over the economic interests of private ranchers. Commercial cattle ranches have serious negative environmental impacts on the park - polluting waterways, causing soil erosion, and harming the many endangered and threatened animals who live on Point Reyes. National parks exist to protect our natural resources and native wildlife. This park should be managed accordingly.

#5098

Name: Mason, Beth

Correspondence: Please adopt Alternative F! It would discontinue farming and ranching opportunities in the park and expand visitor opportunities. After all it is a park- -not a ranch or farm- -that could attract visitors and revenue from them.

The preservation of native wild species must take precedence over farming and ranching activities! It is actually the widespread grazing of cattle that negatively affects ecosystems. Grazing also causes water pollution and soil erosion, spreading invasive species and disease, and harming endangered species.

Please consider anything other than killing these elk! They deserve to exist in their habitat unharmed by people and the impact of people's eating habits (beef) on territory that they have innocently inhabited for decades and/or centuries.

Thank you for taking comments from the public on this matter.

#5099

Name: Macneill, Sandra

Correspondence: My opinion is that plan F is the best and most ecological and sensible way to go. We should not have cattle ranches persisting eternally at our coasts, with their methane gas and manure runoff and detrimental impact on the natural wildlife of the area. Manure runoff polluting the only marine wilderness south of Alaska is not sustainable. Illegally disposing of cattle carcasses around the national seashore is not sustainable. Allowing cattle to give elk and other wildlife life-threatening diseases is not sustainable. Subsidizing and endorsing methane-producing confined animal feeding operations (CAFOs) in an era of climate change is not sustainable. Trucking hay for hundreds of miles as a supplemental feed, because pastures are overstocked and overgrazed, is not sustainable. And yet these practices continue. The cost of ranching to our park. The National Park Service has not provided any information on the dollar amount or portion of its budget that goes to ranching-related expenses. Ranching places increasing demands on dwindling park budgets, while park improvements and a backlog of maintenance, along with public programs and interpretation, go unfunded. Meanwhile, scarce resources go to support 24 ranchers operating in the Seashore, including killing wildlife to benefit their operations.

Let's look at our situation more globally and take all sides into consideration, follow the original plan to buy out the ranchers, and "go natural."

#5100

Name: Nonnenberg, Mark

Correspondence: Adopt alternative F

#5101

Name: De Mink, Dianne

Correspondence: I lived in Oregon near the Elk 'hangout' and found them to be huge, majestic animals and friendly neighbors. In no way can I tolerate their killing of the surrounding neighbors. I got along with them, you can too.

#5102

Name: VanDieren, Holland

Correspondence: I oppose the National Park Service's plan to kill native tule elk and expand commercial agriculture in Point Reyes National Seashore and Golden Gate National Recreation Area. I urge the National Park Service to instead restore the lands for wild animal habitat.

We should prioritize the preservation of our public lands and wildlife, not the economic interests of private ranchers. These commercial cattle ranches have serious negative environmental impacts on the park - polluting waterways, causing soil erosion, and harming the many endangered and threatened animals who live on Point Reyes. National parks exist to protect our natural resources and native wildlife. This park should be managed accordingly.

#5103

Name: Molocher, Edith

Correspondence: Please do not permit tule elk to be killed while allowing the expansion of agricultural activities.

#5104

Name: Bagrosky, Candice

Correspondence: Please leave these elk alone, they belong to the American people and are part of our heritage. The ranchers are constantly trying to take over more and more public land and our native wildlife is suffering.

#5105

Name: Martinez, Janie

Correspondence: Please adopt Alternative F, which would discontinue farming and ranching opportunities in the park and expand visitor opportunities. NPS please preserve the native wild species that should take precedence over farming and ranching activities. I remind you that grazing negatively affects ecosystems, causing water pollution and soil erosion, spreading invasive species and disease, and harming endangered species. Thank you for your time.

#5106

Name: Hachey, Alma

Correspondence: As a member of the California-based international animal protection nonprofit organization In Defense of Animals with over 250,000 supporters, I oppose the National Park Service plan to kill native Tule elk, grow commercial crops, and permit ranchers to add chickens, turkeys, sheep, pigs, and goats to their exploitative operations.

As national park land, this property was specifically set aside to protect, restore, and preserve the natural environment including the wild animals who live there. The original intention was to phase out dairy and cattle ranching, not add more crops or animals to increase ranching profits.

The proposed plan does not address the damage from grazing, including water-quality degradation and soil erosion. Also, adding new crops will create more conflicts with native wild animals.

Please abandon this inhumane and destructive plan. I urge you to restore the Seashore's Pastoral Zone for wild animal habitat and repurpose historic ranch buildings for scientific research, interpretation, and public education.

#5107

Name: Keifner, Shannon

Correspondence: I care about protecting California's wildlife. I oppose the National Park Service's plan to kill native tule elk and expand commercial agriculture in Point Reyes National Seashore and Golden Gate National Recreation Area. I urge the National Park Service to instead restore the lands for wild animal habitat.

We should prioritize the preservation of our public lands and wildlife, not the economic interests of private ranchers. These commercial cattle ranches have serious negative environmental impacts on the park - polluting waterways, causing soil erosion, and harming the many endangered and threatened animals who live on Point Reyes. National parks exist to protect our natural resources and native wildlife. This park should be managed accordingly.

#5108

Name: N/A, N/A

Correspondence: I urge reconsideration of alternative B in the Point Reyes National Seashore regarding the Tule Elk. Alternative F sounds more reasonable and ecologically sound. Discontinuing farming and ranching would allow the land to be less damaged since grazing causes soil erosion and water pollution. The agreement for ranching and farming was to last 25 years not forever. I understand that discontinuing this would cause economic

hardship but we cannot continue to harm our planet. Many people have had to change careers and move to different locations to work for many reasons. The future of farming and ranching was never guaranteed. The Elk deserve to live in peace. Thank you

#5109

Name: Smith, Gary

Correspondence: please adopt Alternative F, which would discontinue farming and ranching opportunities in the park and expand visitor opportunities. Some things are more important than money, like preserving natural habitat which could be lost forever. Increasing visitors would help preserve the habitat, produce revenue and keep the park safe for future generations.

Regards GSmith

#5110

Name: Masterson, Irina

Correspondence: NA

#5111

Name: echo, jennie

Correspondence: the preservation of native wild species must take precedence over farming and ranching activities. Remind it that grazing negatively affects ecosystems, causing water pollution and soil erosion, spreading invasive species and disease, and harming endangered species.

#5112

Name: BEAULIEU, LINDA

Correspondence: RE: Tule Elk, Point Reyes National Seashore: Please adopt Alternative F, which would discontinue farming and ranching opportunities in the park and expand visitor opportunities. The preservation of native wild species must take precedence over farming and ranching activities. Grazing negatively affects ecosystems, causing water pollution and soil erosion, spreading invasive species and disease, and harming endangered species.

#5113

Name: Shipman, Kate

Correspondence: I care about protecting California's wildlife. I oppose the National Park Service's plan to kill native Tule elk and expand commercial agriculture in Point Reyes National Seashore and Golden Gate National Recreation Area. I urge the National Park Service to instead restore the lands for wild animal habitat.

We should prioritize the preservation of our public lands and wildlife, not the economic interests of private ranchers. These commercial cattle ranches have serious negative environmental impacts on the park - polluting waterways, causing soil erosion, and harming the many endangered and threatened animals who live on Point Reyes. National parks exist to protect our natural resources and native wildlife. This park should be managed accordingly.

Pretty sure cattle ranchers can adapt to a world where they don't get to decide what happens to wildlife in our national parks. There are plenty of other things we need than more cows.

Thank you in advance for your attention.

#5114

Name: Scott, Pippa

Correspondence: This is in addition to my e-mail of this morning, September 16th.

Beyond just advocating for the option I prefer, ALTERNATIVE F, a better plan of all has occurred to me.

You of the National Park Service understand better than any organization how wildly successful the Yellowstone National Park has become. Millions of people visit, tens of thousands each season. There is a growing hunger among human beings to see the wild. Wildlife, wild vistas, wild weather, pristine environments.

Television and film makers have understood this too, and create glorious and popular programs about all kinds of wild creatures, great and small. Delicious and powerful wild spaces, hardly touched. Serene and carefully protected. Very, very nourishing on this threatened busy planet.

Point Reyes National Seashore Park is such a fabulous possible candidate. Utterly beautiful land, beautiful ocean views, and perfectly marvelous wild Tule Elk herds. So enchanting to look at.

Why not a National Park devoted to these rare views.. And to entrancing Tule elk and whatever creatures ultimately come to co-exist with them. For visitors, for hikers, for children, for students. Work that you do so wonderfully well.

No more cows, no more farming, no pigs or sheep, or row crops. A cool deep breath on the California coast. Boy, I'd buy a membership. Wouldn't you? Yes? Thank you, Pippa Scott

#5115

Name: zimmerman, Diana

Correspondence: Please adopt Alternative F, which would discontinue farming and ranching opportunities in the park and expand visitor opportunities. The preservation of native wild species must take precedence over farming and ranching activities. Grazing negatively affects ecosystems, causing water pollution and soil erosion, spreading invasive species and disease, and harming endangered species.

#5116

Name: Ceithaml, Jim

Correspondence:

Save the elk! It is time we rein in the freeloaders in agriculture who expect all taxpayers across the USA to pick up the cost of their businesses. The destruction of wildlife to increase agricultural encroachment on public lands is the most extensive and expensive welfare program in the country.

#5117

Name: Cornwell, Yulia

Correspondence: Hi, I think it's important for the National Park Service to focus on preserving natural habitats and wildlife, and for that reason to vote for the alternative F

#5118

Name: Helbush, Eric

Correspondence: I am not comfortable riding on roads with traffic, there aren't enough loop options, poor connectivity, unsure of bike-legal routes, etc

#5119

Name: Friedman, Steven

Correspondence: Hi, I support the improvements in public and bicycle access outlined under Alternatives B, C, D, E, and F. I support for the following trail connections and plan elements:

A connection between Devil's Gulch and Platform Bridge Road using existing ranch roads.

A connection between Bolinas Ridge Trail at Olema Hill and Point Reyes Station to serve as an interim connection for the Cross Marin Trail.

A connection between Bolinas Ridge Trail and Five Brooks Stables using existing ranch roads.

A connection between Drakes Estero and Abbotts Lagoon Trail using existing ranch roads.

A connection between Marshall Beach Trailhead and Pierce Point Road using existing ranch roads.

An Estero Trail loop using existing ranch roads.

A permitting process for larger-scale bicycling and trail events.

Collaboration with ranchers and other stakeholders to educate the public and address concerns related to public access on working ranch lands.

All of these improvements would enable me to visit the Seashore by bike, rather than car.

I would feel much safer riding in Pt. Reyes National Seashore and surrounding areas on trails, pathways, and ranch roads, rather than on roads shared with fast-moving vehicular traffic.

Riding opportunities are currently very limited and fragmented; Improvements in connectivity and the creation of new loop options would enable me to enjoy more of the Seashore and surrounding areas by bike.

Thank you so much!

#5120

Name: Carbonell, David

Correspondence: I live in Marin, and regularly visit Pt Reyes National Seashore. I would prefer to visit and recreate by bike in Pt Reyes, but unfortunately access is so limited that I end up hiking. I am writing to request increased access as well as new bike trails. This would allow me to enjoy the seashore by hiking AND biking. Any and all ideas to increase trail access to bikes are welcomed wholeheartedly by me.

#5121

Name: LeMaster, Susan

Correspondence: I care about protecting California's wildlife. I oppose the National Park Service's plan to kill native tule elk and expand commercial agriculture in Point Reyes National Seashore and Golden Gate National Recreation Area. I urge the National Park Service to instead restore the lands for wild animal habitat.

We should prioritize the preservation of our public lands and wildlife, not the economic interests of private ranchers. These commercial cattle ranches have serious negative environmental impacts on the park - polluting waterways, causing soil erosion, and harming the many endangered and threatened animals who live on Point Reyes. National parks exist to protect our natural resources and native wildlife. This park should be managed accordingly.

Private ranchers already receive more than their share of public resources. I'm not here to help them make money. I'd rather my share of public resources be spent on the wildlife that belongs on public lands. Please manage public lands as such.

#5122

Name: Dalton, Craig

Correspondence: I support the improvements in public and bicycle access outlined under Alternatives B, C, D, E, and F. I've been riding the roads in Pt Reyes for the last 20 years and have found them more and more dangerous. I'd welcome the opportunity to get off-road if you were able to open up some of the existing ranch roads to public cycling use. I'd love to be able to reach the seashore.

Craig

#5123

Name: Kullaway, Tarrell

Correspondence: A connection between Devil's Gulch and Platform Bridge Road using existing ranch roads.

I support the preferred alternative for the NPS new plan. I would like to enjoy the area by bike but dont feel safe competing with cars.

I am specifically interested in:

A connection between Bolinas Ridge Trail at Olema Hill and Point Reyes Station to serve as an interim connection for the Cross Marin Trail.

A connection between Bolinas Ridge Trail and Five Brooks Stables using existing ranch roads.

A connection between Drakes Estero and Abbotts Lagoon Trail using existing ranch roads.

A connection between Marshall Beach Trailhead and Pierce Point Road using existing ranch roads.

An Estero Trail loop using existing ranch roads.

A permitting process for larger-scale bicycling and trail events.

Collaboration with ranchers and other stakeholders to educate the public and address concerns related to public access on working ranch lands.

#5124

Name: rose, james

Correspondence: I appreciate and support the improvements in public and bicycle access outlined under Alternatives B, C, D, E, and F.\*



I support the following trail connections and plan elements:

A connection between Devil's Gulch and Platform Bridge Road using existing ranch roads.

A connection between Bolinas Ridge Trail at Olema Hill and Point Reyes Station to serve as an interim connection for the Cross Marin Trail.

A connection between Bolinas Ridge Trail and Five Brooks Stables using existing ranch roads.

A connection between Drakes Estero and Abbotts Lagoon Trail using existing ranch roads.

A connection between Marshall Beach Trailhead and Pierce Point Road using existing ranch roads.

An Estero Trail loop using existing ranch roads.

A permitting process for larger-scale bicycling and trail events.

Collaboration with ranchers and other stakeholders to educate the public and address concerns related to public access on working ranch lands.

#5125

Name: Brinkman, Cheryl

Correspondence: Dear NPS, thank you for taking comments on this area and working on a plan for better and safer bicycle access. I don't ride in the area as much as I did when I was a bit younger, but at 55 years of age I'm not as comfortable riding on the edge of roads with frightening drivers on cell phones and speeding. I was bicycle camping with friends in the area last year after Thanksgiving and we all wished there was more opportunity for us to enjoy the area by bike. We all live car free and wish we could ride our bikes in that area more.

I appreciate and support the improvements in public and bicycle access outlined under Alternatives B, C, D, E, and F.

In particular I support and look forward to:

A connection between Devil's Gulch and Platform Bridge Road using existing ranch roads.

A connection between Bolinas Ridge Trail at Olema Hill and Point Reyes Station to serve as an interim connection for the Cross Marin Trail.

A connection between Bolinas Ridge Trail and Five Brooks Stables using existing ranch roads.

A connection between Drakes Estero and Abbotts Lagoon Trail using existing ranch roads.

A connection between Marshall Beach Trailhead and Pierce Point Road using existing ranch roads.

An Estero Trail loop using existing ranch roads.

A permitting process for larger-scale bicycling and trail events.

Collaboration with ranchers and other stakeholders to educate the public and address concerns related to public access on working ranch lands.

#5126

Name: Cavaliere, Courtney

Correspondence: I care about protecting California's wildlife. I oppose the National Park Service's plan to kill native tule elk and expand commercial agriculture in Point Reyes National Seashore and Golden Gate National Recreation Area. I urge the National Park Service to instead restore the lands for wild animal habitat.

We should prioritize the preservation of our public lands and wildlife, not the economic interests of private ranchers. These commercial cattle ranches have serious negative environmental impacts on the park - polluting waterways, causing soil erosion, and harming the many endangered and threatened animals who live on Point Reyes. National parks exist to protect our natural resources and native wildlife. This park should be managed accordingly.

#5127

Name: Meares, Robin

Correspondence: I am appalled with your plan to kill the Tule Elk in Point Reyes to make room for grazing. This is California. We cherish our natural inhabitants not kill them. DO NOT DO THIS

#5128

Name: Rivers, William

Correspondence: I am writing to you about access to Point Reyes National Seashore for cycling. Whenever bike paths are connected up and extended they get used by more and more people. It is hugely encouraging for kids to have safe bike routes away from cars, it gives them confidence (and decreases my level of worry) and gets them out into nature to properly experience it.

Adding such paths hardly any impact on the environment and decreases car impact.

Typically any concerns of people ranching on the land can be addressed with consultation and pragmatism.

Please help increase this access to this beautiful space for us and our child and children's children.... a legacy to be proud of.

Many thanks for your consideration

#5129

Name: Becker, Charles

Correspondence: Hi,

I appreciate and support the improvements in public and bicycle access outlined under Alternatives B, C, D, E, and F.

Including: A connection between Devil's Gulch and Platform Bridge Road using existing ranch roads.

A connection between Bolinas Ridge Trail at Olema Hill and Point Reyes Station to serve as an interim connection for the Cross Marin Trail.

A connection between Bolinas Ridge Trail and Five Brooks Stables using existing ranch roads.

A connection between Drakes Estero and Abbotts Lagoon Trail using existing ranch roads.

A connection between Marshall Beach Trailhead and Pierce Point Road using existing ranch roads.

An Estero Trail loop using existing ranch roads.

A permitting process for larger-scale bicycling and trail events.

All of these improvements would enable me to visit the Seashore by bike, rather than car.

I would feel much safer riding in Pt. Reyes National Seashore and surrounding areas on trails, pathways, and ranch roads, rather than on roads shared with fast-moving vehicular traffic.

Thank you

#5130

Name: Alaway, Brian

Correspondence: Our national parks belong to ALL Americans not just commercial interests. I care about protecting California's wildlife. I oppose the National Park Service's plan to kill native tule elk and expand commercial agriculture in Point Reyes National Seashore and Golden Gate National Recreation Area. I urge the National Park Service to instead restore the lands for wild animal habitat.

We should prioritize the preservation of our public lands and wildlife, not the economic interests of private ranchers. These commercial cattle ranches have serious negative environmental impacts on the park - polluting waterways, causing soil erosion, and harming the many endangered and threatened animals who live on Point Reyes. National parks exist to protect our natural resources and native wildlife. This park should be managed accordingly.

#5131

Name: N/A, N/A

Correspondence: Thank you for working to open up new trails. Please do all you can to prohibit electric bikes at PT Reyes and other places of nature. These motor bikes will eventually ruin what we all want to preserve

#5132

Name: N/A, N/A

Correspondence: The Pt Reyes are is beautiful. I ride my road bike through that area (Olema, Pt Reyes Station, up toward Tomales, etc.) once a week and have done a couple of gravel rides coming down from Mt Tam. Heading over the road into Olema is very crowded on the weekends. The road itself is very rough and the cars are constantly whizzing by.

The dirt trail that drops from Mt Tam onto Sir Francis Drake gets pretty awful as you head down the hill to the road/parking area. Its over grown and rutted. It was be awesome to improve these trails and make more of the area open to riding.

The following connections would be awesome -Between Devil's Gulch and Platform Bridge Road using existing ranch roads. -Between Bolinas Ridge Trail at Olema Hill and Point Reyes Station to serve as an interim connection for the Cross Marin Trail. -A connection between Bolinas Ridge Trail and Five Brooks Stables using existing ranch roads. -Between Drakes Estero and Abbotts Lagoon Trail using existing ranch roads. -Between Marshall Beach Trailhead and Pierce Point Road using existing ranch roads. -An Estero Trail loop using existing ranch roads.

I love spending my free time outside and these improvements would enable me to do more exploring by bike and in a much safer way.

#5133

Name: N/A, N/A

Correspondence: more bicycle access on public lands would enhance the public's access and enjoyment of that land

#5134

Name: Lanier, Warren

Correspondence: Having recently tried to find easily accessible loops for riding Mt. Bikes in the park, it quickly became obvious that there was almost no options to see very much of Pt. Reyes by bike that weren't simple "out and backs" on a single trail, and even more disheartening, there were incredibly limited places to ride at all.

I'm in support of more bike options to allow greater access to these amazing park lands, including the following objectives supported by MCBC:

- A connection between Devil's Gulch and Platform Bridge Road using existing ranch roads.
- A connection between Bolinas Ridge Trail at Olema Hill and Point Reyes Station to serve as an interim connection for the Cross Marin Trail.
- A connection between Bolinas Ridge Trail and Five Brooks Stables using existing ranch roads.
- A connection between Drakes Estero and Abbotts Lagoon Trail using existing ranch roads.
- A connection between Marshall Beach Trailhead and Pierce Point Road using existing ranch roads.
- An Estero Trail loop using existing ranch roads.
- A permitting process for larger-scale bicycling and trail events.
- Collaboration with ranchers and other stakeholders to educate the public and address concerns related to public access on working ranch lands.

Let work together to get out of our cars and get out into nature. The conflicts between trail users of the 80s and 90s have given way to a mutual love and respect of our wildlands. The easier and more accessible our public parks are, the more people will be invested in protecting and maintaining them.

The narrow highway and roads through the park are dangerous and uninviting to cyclists and Mt. Bikers. Loop trails, connections, ranch roads, and access to the coast would each improve park experiences and increase exposure for the public.

Please act to increase access and bring in more advocates for our National Parks and wildlands.

Best,

w

#5135

Name: Kallins, Wendi

Correspondence: I support the continued ranching in the Point Reyes National Seashore and mostly support the

preferred alternative. However, I do believe that it needs some refinement. Once a family has decided to quit ranching The ranch should revert to national park and not be passed on to a new rancher. This will allow some attrition without causing undo hardship to the current ranching families and can ultimately reduce the cattle to a more manageable level.

I'd like to see a relocation program for the Elk if possible. Most people simply don't understand why the culling is necessary to the health of the herd and relocation would help to address public outcry.

I support diversification of ranching but only if done in a sustainable manner using regenerative agricultural practices. Carbon sequestration should be a vital piece of ranching practices. Ranches outside the park are already showing how ranching can be done in a way that protects the local ecology and can reduce the carbon footprint.

I also support expanding the bicycle and pedestrian access to the park. Specifically I support: A connection between Devil's Gulch and Platform Bridge Road using existing ranch roads - I bike this all the time to get to Point Reyes and would love to do it off road.

A connection between Bolinas Ridge Trail at Olema Hill and Point Reyes Station to serve as an interim connection for the Cross Marin Trail.

A connection between Bolinas Ridge Trail and Five Brooks Stables using existing ranch roads.

A connection between Drakes Estero and Abbotts Lagoon Trail using existing ranch roads.

A connection between Marshall Beach Trailhead and Pierce Point Road using existing ranch roads.

An Estero Trail loop using existing ranch roads.

A permitting process for larger-scale bicycling and trail events.

Collaboration with ranchers and other stakeholders to educate the public and address concerns related to public access on working ranch lands.

#5136

Name: Valdivia, Lynn

Correspondence: Hi,

I ride on roads in the Pt Reyes area, but it is often unnerving to ride with the cars. Many drivers aggressively pass cyclists, which is very dangerous and detracts from the enjoyment of a bike ride. I would ride in the Pt Reyes area more often if there were safer and less car-filled routes.

I want to express my support and appreciation for improvements in access for the public and bicycles as outlined in alternatives B, C, D, E, and F. Additionally, support the following trail connections and plan elements:

\* A connection between Devil's Gulch and Platform Bridge Road using existing ranch roads.

\* A connection between Bolinas Ridge Trail at Olema Hill and Point Reyes Station to serve as an interim connection for the Cross Marin Trail.

\* A connection between Bolinas Ridge Trail and Five Brooks Stables using existing ranch roads.

\* A connection between Drakes Estero and Abbotts Lagoon Trail using existing ranch roads.

- \* A connection between Marshall Beach Trailhead and Pierce Point Road using existing ranch roads.
- \* An Estero Trail loop using existing ranch roads.
- \* A permitting process for larger-scale bicycling and trail events.
- \* Collaboration with ranchers and other stakeholders to educate the public and address concerns related to public access on working ranch lands.

These improvements would increase my enjoyment of the area for cycling and improve my safety by getting me out of the car traffic. Cycling opportunities are already very limited and fragmented. Connectivity improvements and the creation of new loop options would enable me to enjoy more of the Seashore and surrounding areas by bike.

Thank you.

#5137

Name: CASSEL, GILLIAN

Correspondence: Whenever people get out of their cars to walk, cycle, run, paddle, swim or just sit with nature, there is a ripple effect that is positive for the Earth and our communities in many ways. People enjoy themselves more, take time to "smell the roses", appreciate and respect nature, and pass on their appreciation of the beauty and importance of preserving nature in many ways: financial and other. Simply getting to know and appreciate nature improves knowledge, insight and thus the importance to human, plant, and animal long term existence.

Cycling through carefully planned trails in our National Parks is a wonderful way to facilitate this type of knowledge, appreciation and ongoing support.

Cycling through beautiful parts of the National Seashore in Marin would add so much pleasure and appreciation and do no harm to the park. The more people can experience nature without cars, with less gasoline, noise, congestion, and pollution, the better off are our parks and our planet.

Thank you, Gillian Cassel

#5138

Name: Stanley, Chris

Correspondence: I am writing to express my support for expanded access for mountain bikes in the Pt. Reyes National Seashore.

While always difficult to manage multiple user groups, the efforts of the park service to manage and consider increased access is appreciated.

While I do love the Pt Reyes National Seashore, I rarely visit due to the lack of access for bikes. While numerous trails exist, there is very limited access to bikes and those that are accessible do not have a sufficient length or loop option to make them very worthwhile. For other combinations, requiring riding on roads without significant bike lanes or room for bikes the preference is to avoid the area.

There are such great opportunities there that I feel would allow more access to bikes while still maintaining some horse only / hiker only access where deemed appropriate.

Please consider expanded access for some key areas such as these proposed improvements:

-A connection between Devil's Gulch and Platform Bridge Road using existing ranch roads.

-A connection between Bolinas Ridge Trail at Olema Hill and Point Reyes Station to serve as an interim connection for the Cross Marin Trail.

-A connection between Bolinas Ridge Trail and Five Brooks Stables using existing ranch roads.

-A connection between Drakes Estero and Abbotts Lagoon Trail using existing ranch roads.

-A connection between Marshall Beach Trailhead and Pierce Point Road using existing ranch roads.

Thank you for all of your help and consideration Chris

#5139

Name: Mackibben, Jacob

Correspondence: As someone who grew up backpacking in point Reyes as a young scout and later as a college student back home on break, i'm ecstatic that you're increasing access to the point Reyes landscape. Currently, enjoying point Reyes via bike puts riders at undue risk via the lack of separate, dedicated bike paths. We're forced to ride in the road with vehicles that occupy the vast majority of the road driven by drivers who are more likely to run you off the road than they are to give you the three feet mandated by the state when passing. We as a society need to start making travel by bike more accessible and more fun if we want a chance of combatting climate change. Encouraging the local population and visitors to enjoy the natural splendor that point Reyes provides is a great way to help others realize the benefits of traveling via bike.

Thanks fo much for listening to another idiot on a bike!

#5140

Name: Harris, Aprille

Correspondence: I care about protecting California's wildlife. I oppose the National Park Service's plan to kill native tule elk and expand commercial agriculture in Point Reyes National Seashore and Golden Gate National Recreation Area. I urge the National Park Service to instead restore the lands for wild animal habitat.

We should prioritize the preservation of our public lands and wildlife, not the economic interests of private ranchers. These commercial cattle ranches have serious negative environmental impacts on the park - polluting waterways, causing soil erosion, and harming the many endangered and threatened animals who live on Point Reyes. National parks exist to protect our natural resources and native wildlife. This park should be managed accordingly.

Thank you, Aprille Harris

#5141

Name: Rademacher , Catherine

Correspondence: I care about protecting wildlife. I oppose the National Park Service's plan to kill native tule elk in California and expand commercial agriculture in Point Reyes National Seashore and Golden Gate National Recreation Area. I urge the National Park Service to instead restore the lands for wild animal habitat.

We should prioritize the preservation of our public lands and wildlife, not the economic interests of private ranchers. These commercial cattle ranches have serious negative environmental impacts on the park - polluting waterways, causing soil erosion, and harming the many endangered and threatened animals who live on Point

Reyes. National parks exist to protect our natural resources and native wildlife. This park should be managed accordingly.

#5142

Name: Brady, Nessa

Correspondence: Hi I live in Mill Valley but spend a significant amount of time in Stinson beach and regularly take my life in my hands and ride my road bike on hWY 1. I would much prefer to be riding my mountain bike however there are so few trails in west Marin that it is next to impossible for me to ride my Mountain Bike. I am so excited to hear about the possibility of all the following trail connectors which would make it possible for me to leave my road bike at home and get out of the crazy hwy 1 traffic.

A connection between Devil's Gulch and Platform Bridge Road using existing ranch roads.

A connection between Bolinas Ridge Trail at Olema Hill and Point Reyes Station to serve as an interim connection for the Cross Marin Trail.

A connection between Bolinas Ridge Trail and Five Brooks Stables using existing ranch roads.

A connection between Drakes Estero and Abbotts Lagoon Trail using existing ranch roads.

A connection between Marshall Beach Trailhead and Pierce Point Road using existing ranch roads.

An Estero Trail loop using existing ranch roads.

A permitting process for larger-scale bicycling and trail events.

Collaboration with ranchers and other stakeholders to educate the public and address concerns related to public access on working ranch lands.

All of these developments sound so awesome for everybody, getting bikes out of the traffic and freeing up the roads and reducing bike/car collisions.

Please move forward with these projects

Nessa Brady

#5143

Name: R, Cristina

Correspondence: To whom it may concern:

I ask that you please adopt Alternative F and discontinue farming and ranching opportunities in Point Reyes National Seashore. The preservation of native wild species must take precedence over farming and ranching activities, and grazing negatively affects ecosystems, causing water pollution and soil erosion, spreading invasive species and disease, and harming endangered species.

I thank you in advance for your time and consideration. Best, Cristina

#5144

Name: Bagley , Patricia



Correspondence: "The proposed plan includes the killing of native Tule elk to provide more grass for cattle which graze in the seashore, the introduction of sheep, goats, chickens and pigs and the conversion of grasslands to row crops such as I read a couple articles about this but it's been a few weeks and I forgot about the Expansion part! I don't agree with this expansion or preservation of agriculture in this plan! I know dealing with the long time ranchers is complex but you dealt with the Oyster Farm business and there're still such business nearby. I think you are leaning too far in pro-agribusiness. Just cuz of fall out, which wasn't from everyone by any means. I think people had a harder time understanding the problem with oysters. There's plenty of farms and cattle in that whole area surrounding the PR Preserve!

There are so few wild-er places for Plant and Wildlife Reserves/Preserves on public land where millions can appreciate and enjoy the land and stunning ecosystems, over the few in business there. We have a responsibility beyond ourselves, beyond our own species, we must be Land Stewards, that's your job in the Point Reyes National Seashore. Set aside in the first place for its unique and breathtaking beauty! That Is It's Purpose!

Thank you for your consideration.

#5145

Name: Warden, Lisa

Correspondence: As a Bay Area resident, taxpayer, and chronic voter, I care deeply about protecting California's wildlife. I strongly oppose the National Park Service's plan to kill native tule elk and expand commercial agriculture in Point Reyes National Seashore and Golden Gate National Recreation Area. I urge the National Park Service to instead restore the lands for wild animal habitat.

We should prioritize the preservation of our public lands and wildlife, not the economic interests of private ranchers. These commercial cattle ranches have serious negative environmental impacts on the park - polluting waterways, causing soil erosion, and harming the many endangered and threatened animals who live on Point Reyes. National parks exist to protect our natural resources and native wildlife. This park should be managed accordingly.

#5146

Name: N/A, C

Correspondence: Hi, I would like to request more bike routes in Point Reyes. I'm not comfortable riding on roads with traffic, there aren't enough loop options, there is poor connectivity, and I am unsure of bike-legal routes. Please help make more bike routes so people can get out of their cars and onto their bikes to help the environment, build community and stay healthy. Thanks you.

#5147

Name: Young, Kyle

Correspondence: Obviously they aren't happy with their \$50 million and they are continuing to make money using the countries land to make their product by letting their animals eat and grow letting them make even more money! I have one thing to say to ranchers and pretty much all ranchers: fuck you

#5148

Name: Hodge, Carolyn

Correspondence: As a resident of Marin County I am a frequent visitor at least 12x per year to the Pt. Reye Seashor, by bicycle and car. I ride at least monthly both off road (Bollinas Ridge) and on the road Rte 1 from Bollinas to Limantour and Pt Reyes Station and Pt Reyes Seashore.

I appreciate the NPS effort to expand recreation and access for all types of users, especially bicyclists and people with disabilities. I support the improvements in public and bicycle access outlined under Alternatives B, C, D, E, and F.

- A connection between Devil's Gulch and Platform Bridge Road using existing ranch roads.
- A connection between Bolinas Ridge Trail at Olema Hill and Point Reyes Station to serve as an interim connection for the Cross Marin Trail.
- A connection between Bolinas Ridge Trail and Five Brooks Stables using existing ranch roads.
- A connection between Drakes Estero and Abbott's Lagoon Trail using existing ranch roads.
- A connection between Marshall Beach Trailhead and Pierce Point Road using existing ranch roads.
- An Estero Trail loop using existing ranch roads.

Specifically expanding connections that would make cycling a better option to visit the seashore, and expanding off road connections for trail biking. I would feel much safer riding in Pt. Reyes National Seashore area on trails, pathways, and ranch roads, rather than on roads shared cars.

As a group cyclist with several local organizations, it would be a great way to get more visitors to enjoy Pt Reyes area NOT in a car if NPS allowed new permitting process for larger-scale bicycling and trail events.

Thank you!

#5149

Name: Watson, Jena

Correspondence: I support increasing the accessibility of Pt Reyes Station to bicycles and look forward to having the trailers connect in west Marin!

#5150

Name: Flores, Juliet

Correspondence: I care about protecting California's wildlife. I oppose the National Park Services plan to kill native Tule Elk and expand commercial agriculture in Point Reyes National Seashore and Golden Gate National Recreation Area. I urge the National Park Service to instead restore the lands for wild animal habitat.

#5151

Name: Škalič, Dita

Correspondence: I believe preserving wildlife and natural resources should be the top priority. Therefore, no elk should be shot and ranching should be phased out or reduced. Farmers should get opportunities to earn their income in other ways like hosting visitors or supervising the landscape.

#5152

Name: Philips, Andrew

Correspondence: Please provide bicycle access to Pt Reyes National Seashore for both mountain and road bikes. This is a beautiful place and I and my fellow bicyclists would very much appreciate riding through the park.

Thank you.

Andy Philips

#5153

Name: Samuels, Mike

Correspondence: Bikes are here to stay, and there will be more and more of them, with e-bikes, just general ridership increase, mountain bike teams in local High Schools, etc. So let's give all bikers safe trails (and lots of them) and roads.

Thanks,

Mike Samuels

#5154

Name: Hunt, John

Correspondence: I ride bicycles in the Pt. Reyes area and I would like to see more safe options and connecting trails.

I support for the following trail connections and plan elements:

A connection between Devil's Gulch and Platform Bridge Road using existing ranch roads.

A connection between Bolinas Ridge Trail at Olema Hill and Point Reyes Station to serve as an interim connection for the Cross Marin Trail.

A connection between Bolinas Ridge Trail and Five Brooks Stables using existing ranch roads.

A connection between Drakes Estero and Abbotts Lagoon Trail using existing ranch roads.

A connection between Marshall Beach Trailhead and Pierce Point Road using existing ranch roads.

An Estero Trail loop using existing ranch roads.

A permitting process for larger-scale bicycling and trail events.

Collaboration with ranchers and other stakeholders to educate the public and address concerns related to public access on working ranch lands.

Pt Reyes would be a safer and better place to ride with more connectors and trail options. This would also get more bikes off the paved roads and out of the way of cars.

#5155

Name: vricella-stokes, josephine

Correspondence: Please do not make everything about money and human interest. Protect the fate of tule elk at Point Reyes National Seashore in California. Farmers and ranchers who have been leasing thousands of acres of the park to graze cattle apparently don't want to share these grasslands with elk, so the National Park Service is considering a plan that would permit elk to be killed while allowing the expansion of agricultural activities. Please do not allow this to happen

#5156

Name: Thompson, Helen

Correspondence: I oppose Californias National Park Services plan to kill Tule Elk at Point Reyes National Seashore for the sole purpose of expanding Commercial Agriculture. Our job is to protect Wildlife, not destroy it for a select few. These are public lands that have been set aside for the public to enjoy. Since 1970, over 60% of Wildlife has already been killed off at the hands of man. Now you want to kill off MORE. Your job is to conserve and protect Wildlife, not cater to private farmers who pollute water, the environment, abuse animals, etc. I urge you to do your job and protect the Tule Elk i stead of murdering them.

#5157

Name: latimer, jon

Correspondence: To who it may concern: My name is Jonathan Latimer - a cyclist and bike-packer of the Bay Area for 25 years. There are few roads that I have never cycled in these areas, but this last weekend a friend and I biked from San Rafael to Point Reyes for the first time, enjoying a stay at Sammuel P Taylor as well as the beautiful and stress free ride on the Cross Marin Trail. The ride was fantastic all the way into Camp Taylor, but after we set up camp and continued on, we found the end of the trail at the Platform Bridge, and found our experience became dramatically less "stress-free", to put it mildly. There was no shoulder for most of the ride from Platform Bridge, on into Point Reyes Station, which was a beautiful town with lots to see and do, but I dare say I might not attempt it again. Coming back after dinner was perilous. Cars were moving very fast, and again, not much of shoulder to ride on. Even with very bright lights it was difficult to see. I heard from some local cyclists that there are several proposals on the table to connect various paths and improve cycling access to these areas using a combination of existing ranch roads and the addition of some new trails. I cannot stress enough what a great idea this would be! In particular, I've heard of the following: 1) a connection between Devils Gulch and Platform Bridge Road; 2) a connection between Bolinas Ridge Trail and Five Brooks Stables; 3) a connection between Drakes Estero and Abbotts Lagoon Trail; 4) a connection between Marshall Beach Trailhead and Pierce Point Road. These would enable cyclist to enjoy multiple loops in and around the area while minimizing exposure to traffic and congesting, while simultaneously improving traffic and congestion by offering a healthy, viable and safe alternative to driving in and out of the area (biking!). I have no doubt that this would improve commerce in Point Reyes and the surrounding towns, while also minimizing the problems of car parking. Cyclists are a hungry, thirsty people, and are generally very generous with their money while visiting, while leaving little to no carbon footprint. This is a no-brainer! Please, please please! I would love to return to point Reyes many times over, and would frequent the beaches in the area if riding were more safe. Thanks for your time and consideration. -JL

#5158

Name: Weber, Clark

Correspondence: Please provide greater bike access to Pt Reyes. So many of the trails are underutilized at Pt Reyes, and to open up more trails that include bikes will make more of the park more accessible for everyone. I'd love to see bike access for the following trails:

- A connection between Devil's Gulch and Platform Bridge Road using existing ranch roads. - A connection between Bolinas Ridge Trail at Olema Hill and Point Reyes Station to serve as an interim connection for the Cross Marin Trail. - A connection between Bolinas Ridge Trail and Five Brooks Stables using existing ranch roads. - A connection between Drakes Estero and Abbotts Lagoon Trail using existing ranch roads. - A connection between Marshall Beach Trailhead and Pierce Point Road using existing ranch roads. - An Estero Trail loop using existing ranch roads. - A permitting process for larger-scale bicycling and trail events.

Thank you for considering bikes at Pt Reyes. As a frequent visitor for hiking and trail running, I welcome the opportunity to ride my bike on the trails as well.

#5159

Name: Scruggs, Raymond

Correspondence: Hi Pt. Reyes Park Service,

Opening and developing more trails to bicycles on Pt. Reyes would be a great addition to other bicycle trails in Marin. Especially because Pt. Reyes trails would be rather flat and beginner "friendly". Most trails for bikes in Marin include much difficult climbing which are difficult for new riders other than those under about 25 years old to begin riding off road.

#5160

Name: Randolph, Patricia

Correspondence: I have written the Madravenspeak living wildlife column the past 9 years for The Capital Times one hundred year old newspaper out of Madison, Wisconsin. Science reveals that 60% of mammals on earth are now livestock, 36% humans and only 4% wild mammals remain on the planet. "Leadership" has killed off the wild to graze the tamed, to destroy ancient aquifers, desertify public lands and wipe out wildlife across the planet for deforestation, accelerating climate crisis and a million species going extinct now. All human decisions:

[https://madison.com/ct/opinion/column/patricia-randolph-s-madravenspeak-earth-s-mammals-humans-and-livestock/article\\_30903c45-4889-5cf7-aac8-a09e3e4b432e.html](https://madison.com/ct/opinion/column/patricia-randolph-s-madravenspeak-earth-s-mammals-humans-and-livestock/article_30903c45-4889-5cf7-aac8-a09e3e4b432e.html)

Evidently this land was licensed for 25 years to grazing for private profit back in the early 1960's...like much of our public lands in the Taylor Grazing Act. It is high time to reclaim our public lands, purge the scourge of livestock and private profit and return the land to the biodiversity that supports all life including humans. Even the Vatican met in February, 2017 ( hardly your animal rights organization ) and declared biodiversity destruction co-equal to climate heating as the crises that threaten human survival on the earth...and all life.

Rid the land of grazing livestock and the scourge of their contribution to biodiversity destruction and climate horrors facing all of us - and return it to indigenous and wild mammals. You have a responsibility to go beyond political self interest and ignorance and cruelty to represent the public good and the earth's survival as a living planet with some of the biodiversity we were blessed with 50 years ago. In that fifty years 2/3 of wildlife on this planet has been destroyed, with an emphasis on large mammals and natural carnivores who keep balance and health for people and wildlife.

Otherwise, you are encouraging more prion diseases like Chronic Wasting disease, lyme disease, West Nile disease, other tick diseases and bubonic plague found in mule deer out west where natural carnivores were purged.

#5161

Name: Grosse, Kati

Correspondence: I care about protecting California's wildlife. I oppose the National Park Service's plan to kill native tule elk and expand commercial agriculture in Point Reyes National Seashore and Golden Gate National Recreation Area. I urge the National Park Service to instead restore the lands for wild animal habitat.

We should prioritize the preservation of our public lands and wildlife, not the economic interests of private ranchers. These commercial cattle ranches have serious negative environmental impacts on the park - polluting waterways, causing soil erosion, and harming the many endangered and threatened animals who live on Point Reyes. National parks exist to protect our natural resources and native wildlife. This park should be managed accordingly.

#5162

Name: N/A, N/A

Correspondence: Please adopt Alternative F, which would discontinue farming and ranching opportunities in the park and expand visitor opportunities. The preservation of native wild species must take precedence over farming and ranching activities. Grazing negatively affects ecosystems, causing water pollution and soil erosion, spreading invasive species and disease, and harming endangered species.

#5163

Name: burns, roland

Correspondence: The elk deserve priority. The farmers have been given an opportunity to graze cattle. But the elk must come first!

#5164

Name: Gagne, Wendy

Correspondence: PLEASE stop the senseless killing of animals....they ttend to havee their own life cycle just as humans....be it old age or accidental....the killing of earths creatires for sport or fun or population control is so out dated....it must stop.... I personally ask you to reconsider your decision asap

#5165

Name: Trottier, Jaye

Correspondence: Regarding the conflict in Point Reyes National Seashore, CA between native Tule elk and cattle, I ask that the National Park Service NOT consider "Alternative B," which involves killing some of the elk and offering another 20-year lease agreement to the farming and ranching families.

The lessees would be allotted over 26,000 acres and allowed to maintain over 5,500 cows, while the Drakes Beach elk herd's population, which numbered a mere 124 animals in 2018, would be limited to 120 animals maximum, and the Limantour herd, which numbered 174 animals in 2018, would be "managed in consideration of ranch operations," meaning that there would be no limit to how many could be killed. Further, Alternative B allows for agricultural "diversification," so the lessees could even bring in pigs and sheep and plant row crops.

I instead strongly urge the NPS to adopt "Alternative F," which would discontinue farming and ranching opportunities in the park and expand visitor opportunities. The preservation of native wild species must take precedence over farming and ranching activities. Please note that grazing negatively affects ecosystems, causing water pollution and soil erosion, spreading invasive species and disease, and harming endangered species.

Please adopt Alternative F in place of Alternative B.

Thank you for your consideration. I respectfully ask that you withhold my personally identifiable information from public review. Thank you.

#5166

Name: Bregoff, Robert

Correspondence: I support whatever alternative would provide the most access to bicycle travelers on Wide trails and fire roads. I have always enjoyed bicycling to Pt. Reyes. Some road features that are necessary to herd management such as cattle guards, present a hazard to cyclists, and cattle can degrade existing fire roads and trails by increasing erosion and increasing the amount of animal excrement. Bike and pedestrian access is consistent with plans to return Pt. Reyes to a more natural area. Cars are cattle are not. With the limited roadway space it's important to support safe, quiet bicycle travel.

#5167

Name: Martin, Nola

Correspondence: Stop this insanity! Leave the wildlife alone and keep the money-hungry ranchers and their pastures off of our public lands!

#5168

Name: Lederer, Melissa

Correspondence: I care about protecting California's wildlife. I oppose the National Park Service's plan to kill native tule elk and expand commercial agriculture in Point Reyes National Seashore and Golden Gate National Recreation Area. I urge the National Park Service to instead restore the lands for wild animal habitat.

We should prioritize the preservation of our public lands and wildlife, not the economic interests of private ranchers. These commercial cattle ranches have serious negative environmental impacts on the park - polluting waterways, causing soil erosion, and harming the many endangered and threatened animals who live on Point Reyes. National parks exist to protect our natural resources and native wildlife. This park should be managed accordingly.

#5169

Name: N/A, N/A

Correspondence: I care about protecting California's wildlife. I oppose the National Park Service's plan to kill native tule elk and expand commercial agriculture in Point Reyes National Seashore and Golden Gate National Recreation Area. I urge the National Park Service to instead restore the lands for wild animal habitat.

We should prioritize the preservation of our public lands and wildlife, not the economic interests of private ranchers. These commercial cattle ranches have serious negative environmental impacts on the park - polluting waterways, causing soil erosion, and harming the many endangered and threatened animals who live on Point Reyes. National parks exist to protect our natural resources and native wildlife. This park should be managed accordingly.

Thank you, Jill

#5170

Name: N/A, N/A

Correspondence: I strongly urge the adoption of Alternative F, which would discontinue farming and ranching opportunities in the park and expand visitor opportunities. The preservation of native wild species must take precedence over farming and ranching activities. Farming negatively affects ecosystems, causing water pollution and soil erosion, spreading invasive species and disease, and harming endangered species.

#5171

Name: Polina, Nancy

Correspondence: As a lifelong Californian and frequent visitor to Point Reyes, I find it imperative that we start valuing this nation's wildlife and public lands as opposed to bending to the whims of private ranchers. The National Park Service's plan to kill native tule elk and expand commercial agriculture in Point Reyes National Seashore and Golden Gate National Recreation Area is abhorrent and will haunt us for generations to come should it proceed. The National Park Service should uphold its values by restoring the lands for wild animal habitat, rather than sanctioning such an arbitrary slaughter of these native creatures.

It is unsustainable to continuously prioritize the economic interests of private ranchers as these ranches cause irrevocable environmental damage. Please do not make the already vulnerable wildlife Point Reyes suffer for such an avaricious cause. National parks are meant to protect our natural resources and native wildlife, are they not? These elk are a part of what makes Point Reyes one of my favorite parks to visit. The majesty of California wildlife should be venerated, not exploited. Thank you for taking the time to read this, I sincerely hope that the National Park Service will recognize how vital it is that we work to preserve our national parks and the life that deserves to flourish within them.

#5172

Name: N/A, Dashi

Correspondence: Dear Superintendent,

I am a Petaluma & Inverness resident, and I visit Point Reyes National Seashore several times a week to hike trails and visit beaches to enjoy my public land and the native plants and wildlife. I have spent thousands of hours and miles walking in PORE and know the area very well. There are too many generalities in all the alternatives in the GMPA for me to endorse any one of them. Here are some of my concerns:

The dairy operations within the park, particularly near Drakes Bay and Pierce Point, are some of the most trampled, abused and unsightly areas of the park. Loafing and grazing have degraded the coastal prairie and invasive plant species are common where grazing has been heavy.

As for the Tule Elk, they are an ecologically important part of the landscape of Point Reyes National Seashore. It is a visitor's privilege to view the elk in the seashore and to hear them bugle. Their recovery is a success story for restoring native ecosystems, consistent with the mission of the National Park Service.

Ranching on public land is not a right, it is a privilege. Commercial lease holders should not dictate wildlife removal or exclusion policies. Confinement, fencing, removal, hazing, and killing of wildlife in the national park for the benefit private ranch operators is unacceptable.

Given the founding purposes of Point Reyes National Seashore, commercial leases or activities at the Seashore should not conflict nor interfere with the protection of natural or cultural resources or public access to the park.

Tax dollars subsidize ranching in the national park, but taxpayers have limited access to large parts of the Seashore, at times further limited by fences, locks, and signage posted by ranchers. The GMPA must ensure, and the NPS must enforce the public's right to access the park.

Allowing private ranches to expand operations at the Seashore would reduce public access to the park, damage wildlife habitat, and degrade water quality. I am opposed to the ranchers' demand to grow commercial row crops and introduce sheep, goats, pigs, turkeys or chickens to the national park, which could create conflicts with native wildlife and create pressure to kill native predators like bobcats, coyotes, and foxes.

I would like to see the Park provide the following information to support the best management decision:

- Provide the data that supports that the elk populations -as is- are causing a negative impact on park grasses. -
- Provide a complete management plan that addresses the impact on commercial traffic increases in the park to support new vegetable growing. -Provide a comprehensive plan on road damage and repairs that will be necessary with the increased commercial traffic to support vegetable growing, trucks to support the hauling of pigs, chickens, goat and sheep operations. -Provide a complete cost analysis to support the new land uses, including park staff, enforcement, fencing, pesticide use monitoring, and any additional cost associated with these land uses. -Explain why there is no mention of cattle reductions based on the smaller land available due to use for silage, new domestic animals and row cropping. -Provide a detailed report on the effect of silage mowing on nesting birds, deer, coyotes, badgers, weasels, and other native wildlife.



Thank you.

#5173

Name: Levine, William

Correspondence: I currently ride mountain bike in the Pt. Reyes area. I would you'd liketo ride more but there aren't enough loop options, trail and fire road options open to mountain bikes.

I am in favor of these options:

A connection between Devil's Gulch and Platform Bridge Road using existing ranch roads.

A connection between Bolinas Ridge Trail at Olema Hill and Point Reyes Station to serve as an interim connection for the Cross Marin

A connection between Bolinas Ridge Trail and Five Brooks Stables using existing ranch roads.

A connection between Drakes Estero and Abbotts Lagoon Trail using existing ranch roads.

A connection between Marshall Beach Trailhead and Pierce Point Road using existing ranch roads.

An Estero Trail loop using existing ranch roads.

Collaboration with ranchers and other stakeholders to educate the public and address concerns related to public access on working ranch lands.

These improvements would enable me to visit the Seashore by bike, rather than car. I would feel much safer riding in Pt. Reyes National Seashore and surrounding areas on trails, pathways, and ranch roads, rather than on roads shared with fast-moving vehicular traffic.

Bicycling opportunities are currently very limited and fragmented; connectivity improvements and the creation of new loop options would enable me to enjoy more of the Seashore and surrounding areas by bike.

#5174

Name: Bidgood, Mark

Correspondence: I support increased bicycle access to the Point Reyes National Seashore. I do currently ride the bicycle trails available at Stewart Ranch and Bear Valley. I would utilize Point Reyes are more if more trails were open to strictly pedal powered bicycles. I am a long time user of the park and have lived in the area and enjoyed the sea shore for over 50 years.

Sincerely, Mark Bidgood

#5175

Name: Irving, Daniel

Correspondence: Hi there - i would like to see increased trail access for bikes to Pt Reyes Natl Seashore. I have a very strong connection to the seashore, i have been going there since i was a toddler and it was also where i proposed to my wife. I would love to spend more time there and i would if there were more trails available for bikes. I could then visit the seashore by bike and not car. It would increase safety (less Bike vs car incidents) and enable cyclists to better experience the beauty of this great destination.

I support the improvements outlined under alternatives B, C, D, E and F.

#5176

Name: Lin, Doris

Correspondence: The NPS' preferred plan prioritizes the economic interests of the commercial cattle industry over the lives of wild animals and the integrity of natural habitats. In addition to allowing the NPS to kill elk, it would extend ranch leases to up to 20 years (currently five year terms are offered), expand leases into an additional 7,600 acres of the park, and allow ranchers to diversify their businesses beyond cows to include other farmed animals.

Many of the park's visitors come to see these beautiful animals. Yet the existing tule elk are already outnumbered nearly ten to one by cows.

These are terrible proposals. Please reject them. Thank you. Doris

#5177

Name: Nichols, Peggy

Correspondence: I am sick and tired of these RANCHERS Entitlement issues!! These Parks are for the safety of our wildlife in these Parks. These Parks are for the enjoyment of the American people and safety of the wildlife. Just because these RANCHERS want more land for their cattle, and for free, doesn't mean we change laws and let them in!!! They want more space for their cattle, then I would suggest they go BUY Land from a private land owner like the rest of us have to do, then move their cattle there. The State Parks are for the American peoples enjoyment and safety of wildlife. There is also NO REASON to kill off any wildlife in these parks. Let Nature take care of itself!

#5178

Name: Cohen, Nathan

Correspondence: Hello,

I support expanding all bicycle opportunities in Pt. Reyes (road, ranch/fireroads, and singletrack mountain biking). My wife and I have ridden most of the paved roads in Pt. Reyes. While they are great, we have serious concerns with drivers and their safety, so we avoid high traffic times. It would be great to have alternate routes to avoid some of the high-traffic areas. Petaluma-Pt.Reyes Rd is one thoroughfare that is especially dangerous and frustrating, given the amount of traffic and narrow nature from Platform Bridge to HWY 1 at Pt. Reyes Station. We also love the Cross Marin trail and would love to see it expanded to Olema and Pt. Reyes Station. It seems there are many options to utilize existed ranch roads to accommodate new routes and opportunities for bike access. This could allow for a lot more safe routes to and within Pt. Reyes area that would draw in more people on bikes and really advance the culture of the area away from being completely car-centric.

Thank you, Nathan

#5179

Name: N/A, N/A

Correspondence: Save the Elks

#5180

Name: Tartaro, Jeanne

Correspondence: I am deeply concerned about California wildlife (and wildlife, in general). I am strongly against

the National Park Service's plan to kill native tule elk. This plan also includes the expansion of commercial agriculture in Point Reyes National Seashore and Golden Gate National Recreation Area. Indeed, the killing of the tule elk is in response to the complaints of the ranchers, who apparently find their existence in THEIR natural habitat, inconvenient. These park areas are far more valuable as wild animal habitat and resource. The selfish interests of these ranchers is not even the slightest bit comparable to the needs of wildlife, like the tule elk, and the necessity of wild habitat. These commercial ranchers are having a disastrous impact on the parks by eroding soil, polluting water and harming endangered/threatened species. The idea that the parks would put commercial ranchers and their monetary interests ahead of the well-being of native wildlife is simply abhorrent as well as mind-boggling. These parks serve, first and foremost, as areas of protection for wildlife and natural resources. Shame on the National Park Service for even entertaining the idea of expanding commercial agriculture and killing tule elk. They are making a mockery of the reason why these parks exist.

#5181

Name: Hirsch, Eric

Correspondence: Please cancel plans to hunt for elk.

#5182

Name: armstrong, marsha

Correspondence: Please do not value commercial entities profits over the natural environment, ecology, wildlife (not only the Tule elk, but all the plants and animals that will be damaged by increased numbers of farm animals) of Point Reyes National Seashore.

#5183

Name: Henning, Blake

Correspondence: The Rocky Mountain Elk Foundation (RMEF) appreciates the opportunity to comment on the National Park Service (NPS) Point Reyes General Management Plan Amendment (Plan) and Draft Environmental Impact Statement (EIS). The mission of RMEF is to ensure the future of elk, other wildlife, their habitat and our hunting heritage. RMEF's 234,000 members include hunters, ranchers, guides, outfitters, other business owners, wildlife enthusiasts, and other conservationists who have both recreational and economic interests in hunting and enjoying elk on public lands. Since its creation in 1984, RMEF has permanently protected and enhanced more than 7.4 million acres of North America's most vital habitat for elk and other wildlife, including more than 170,000 acres in California. As such, RMEF has an interest in ensuring the future productivity of elk and other wildlife in California.

There are three herds of tule elk, numbering more than 600 animals within this National Park Service facility. All herds have Johnes disease, a contagious, chronic and sometime fatal infection, primarily impacting dairy cattle. Due to the high risk of transmitting the disease to other herds and livestock, RMEF does not support any Alternative within the Draft Plan that allows for movement or translocation of elk to areas outside of Point Reyes, as per California Department of Fish and Wildlife policy.

The Draft Plan and EIS withdrew recreational hunting from further analysis in the Plan. Targeted removals of elk and other game species via hunting have been successfully implemented in other states and RMEF encourages the NPS to reconsider recreational hunting (open to all public) as a viable management tool for future herd management within and outside of Point Reyes.

Thank you for the opportunity to comment on this important issue.

Sincerely, Blake L. Henning Chief Conservation Officer

#5184

Name: Goldin, Chris

Correspondence: Comments Regarding the current General Management Plan Amendment Draft Environmental Impact Statement for the Point Reyes National Seashore: 1. DIVERSIFICATION IMPACTS: Diversification represents a movement away from historic multi-generational beef and dairy ranching that is stated as a cultural and historic value in the Seashore. Commercial sustainability is not a legitimate NPS management goal. The Seashore lacks the authority to consider diversification and fails to analyze all foreseeable impacts of the proposed changes in use on Seashore resources. Diversification needs to be removed from all alternatives as it is outside the scope of the draft EIS.

2. SUCCESSION IMPACTS: Seashore's proposed policy moves away from historic and cultural values to allow existing ranch families to continue to operate and opens up the opportunity for anyone to come in and operate in the park. The framework allows for a future where the Seashore could be fundamentally altered and has a high potential to be incompatible with the purpose of the Seashore and the Organic Act to preserve the park unimpaired for the use and enjoyment of future generations.

3. INCREASED VISITOR USE IN MARINE WILDERNESS: The Seashore does not have the resources to manage the increased visitor usage in the marine wilderness and the draft EIS has failed to explore all of the environmental impacts to the marine wilderness area.

3. TULE ELK: Tule elk are considered a natural resource and constitute an important part of the Seashore's ecosystem. Any strategies to manage the elk populations should be in the context of managing resources like other natural resources within the Seashore and not for the benefit of commercial lease holders.

#5185

Name: Davis, Dylan

Correspondence: I find it to be unconscionable that as the protector of public lands you believe it is better to 'cull' the native Tule elk in favor of cows. The ranchers have more than enough land already, while our native species have almost none. Please do not allow the removal of more of our beautiful land for agricultural purposes. Farms and ranches are nice, but our National Parks are nicer.

#5186

Name: Fin, Amanda

Correspondence: I am fully support of developing alternative trails and routes for bicycling to point Reyes I have bicycled it many times with my two teenage sons and it stressful when the supported routes give to very fast cars and little shoulder Now my son rides this route and heads to Stimson with his friends all on bikes. Please please support bicycling in point Reyes area and open up routes. The more people who feel safe bicycling, the more that will do it.

Bicyclists are good for the local economy, they are hungry and thirsty and keep traffic lower

#5187

Name: Locke, Stephen

Correspondence: I wholeheartedly support the inclusion of bike pathways and rights-of-way into the Point Reyes National seashore. Riding out there on the roads is a hazard to both rider and driver. Having the alternative of bikeways consisting of trails and ranch roads would allow many people to experience the beauty and grandeur of the Point Reyes peninsula and ease road traffic at the same time. Having new connections and loop options would be a dream come true!

#5188

Name: Levin, Daniel

Correspondence: support the improvements in public and bicycle access outlined under Alternatives B, C, D, E, and F

A connection between Devil's Gulch and Platform Bridge Road using existing ranch roads.

A connection between Bolinas Ridge Trail at Olema Hill and Point Reyes Station to serve as an interim connection for the Cross Marin Trail.

A connection between Bolinas Ridge Trail and Five Brooks Stables using existing ranch roads.

A connection between Drakes Estero and Abbotts Lagoon Trail using existing ranch roads.

A connection between Marshall Beach Trailhead and Pierce Point Road using existing ranch roads.

An Estero Trail loop using existing ranch roads.

Collaboration with ranchers and other stakeholders to educate the public and address concerns related to public access on working ranch lands

All of these improvements would enable me to visit the Seashore by bike, rather than car.

I would feel much safer riding in Pt. Reyes National Seashore and surrounding areas on trails, pathways, and ranch roads, rather than on roads shared with fast-moving vehicular traffic.

Bicycling opportunities are currently very limited and fragmented; connectivity improvements and the creation of new loop options would enable me to enjoy more of the Seashore and surrounding areas by bike.

#5189

Name: Freeman, Lucy

Correspondence: This land was originally purchased from the farmers and ranchers to become a park for the use of all. Those ranchers were allowed to use the land for grazing even though they had sold and been paid for the land.

To now continue to let them have this service plus destroy the elk that live there naturally seems wrong in several ways.

#5190

Name: Levin, Sebastien

Correspondence: I have only been out to the Pt. Reyes Area a few times, but it has generally been a positive experience: beautiful area and huge potential for outdoor recreation. For background I am a bike; I enjoy mountain biking and gravel riding. With these two forms of biking, I am able to enjoy a multitude of trails, but still find it hard to get out Pt. Reyes for the following reasons: limited loop options, poor connectivity between trails, and it is unclear what is bike-legal. I would also encourage opening some areas to being developed for single track trails as this is generally done by local bike organizations who generally improve the quality of trails and environmental stewardship.

While the above is a pretty general comment, I also wanted to provide some specific feedback on current projects and plans being discussed. - I appreciate the additional bike and public access outlined under Alternatives B, C, D, E, and F. - I support the connection between Devil's Gulch to Platform Bridge Rd, Bolinas Ridge Trail to Five Brooks Stables, Drakes Estero to Abbotts Lagoon Trail, and Marshall Beach Trailhead to Pierce Point Rd. - The connection between Bolinas Trail at Olema Hill and Point Reyes Station seems like a good connection for the Cross Marin Trail. - The concept of an Estero Trail loop is also interesting to me. - I would also reiterate that I think we need better collaboration between ranchers and other stakeholders related to public access.

These changes would allow me to visit Pt. Reyes by bike rather than by car as well as improve the limited and fragment trail system, which would further encourage me to visit more.

#5191

Name: Popper, Steven

Correspondence: Folks at NPS:

Thank you for all you efforts to provide equal access to our local Parklands!

I enthusiastically support the fololwing:

A connection between Devil's Gulch and Platform Bridge Road using existing ranch roads.

A connection between Bolinas Ridge Trail at Olema Hill and Point Reyes Station to serve as an interim connection for the Cross Marin Trail.

A connection between Bolinas Ridge Trail and Five Brooks Stables using existing ranch roads.

A connection between Drakes Estero and Abbotts Lagoon Trail using existing ranch roads.

A connection between Marshall Beach Trailhead and Pierce Point Road using existing ranch roads.

An Estero Trail loop using existing ranch roads.

And, of course, Collaboration with ranchers and other stakeholders to educate the public and address concerns related to public access on working ranch lands.

These additional trail openings would enable me to visit the Seashore by bike, rather than car.

Also, I would feel much safer riding in Pt. Reyes National Seashore and surrounding areas on trails, pathways, and ranch roads, rather than on roads shared with fast-moving vehicular traffic.

And lastly, bicycling opportunities are currently very limited and fragmented; connectivity improvements and the creation of new loop options would enable me to enjoy more of the Seashore and surrounding areas by bike.

Thanks! Kind Regards- Steven Popper

#5192

Name: Gitschier, Jane

Correspondence: I have two issues with the EIS and its conclusions:

1. While the EIS concludes that the environmentally sound solution is option F, the National Park Service is promoting option B for the future. Clearly, there are parameters that are being considered "behind the report" that are not being revealed. If an option is to be promoted, then the public needs to be informed as to how that conclusion is made, and this report does not do that. What are the parameters that are being weighed OTHER than the Environmental Impact that leads to this proposed option? How are the various parameters weighed? The public must draw the conclusion from the disconnect between the obvious environmental benefits of F and the lack of such benefits in B that something else is at play, presumably the strong agricultural community support for the preservation of the ranches. Is this a rational decision? Is it in keeping with the goals and trajectories set out by the National Park Service in the early 1960's at the inception of PRNS, ie, to close the beef and dairy operations within 25 years? It does not appear so.

2. Second is that the environmental aspects of the cattle methane production through belching are not as clearly presented as they could be in this EIS. Methane has 23 times the effect of CO2 per molecule as a greenhouse gas. This means that every year, each cow in PRNS emits the equivalent of CO2 produced by a gasoline-powered car driven 7500 miles. Added to that is the issue of methane in the manure; how manure is managed in the dairies is not addressed in the report nor is any suggestion of regulating that. World-wide, agriculture, and particularly cattle, is a major contributor to climate change. The NPS has no business contributing to the destruction of our planet. The ranches are historic, but that is the past. Their day in the Seashore should be at an end.

#5193

Name: Gaponoff, Sharma

Correspondence: I first discovered the joys of visiting the Point Reyes National Seashore (PRNS) in the early 1970's when I was a college student. I was captivated by the surrounding beauty while riding equestrian trails and hiking. I have continued to enjoy many visits to the park, made memorable by observing small gatherings of magnificent Tule elk (this is the only National Park where these animals are found), and catching glimpses of bobcats, elephant seals and more in their native habitat. I especially enjoy my visits during the grey whale migration where I would go out to the point and watch mommas with calves heading north. But above all, I think it is the smell of the ocean wafting onshore as it mingles its perfume with that of the native plants. All of this makes me feel alive and happy. I have brought many guests, both US and international friends, to enjoy the magic of PRNS with me.

As a taxpayer to the State California and the Federal government, I fear all of this is about to change with the latest General Management Plans for continued care of PRNS. From what I read, all plans except one are the antithesis of how this National Seashore was established by Congress and how I expect my tax dollars to be spent by the National Park Service (NPS) in managing this unique publically owned area.

What I want: The NPS to due their duty for the benefit of the tax paying public for care and conservation of public lands, not for the benefit of private enterprises. Specifically, I expect my tax dollars for PRNS to be spent as spelled out in the purpose and establishment of PRNS by Congress in 1962 "to save and preserve, for the purposes of public recreation, benefit, and inspiration, a portion of the diminishing seashore of the United States that remains undeveloped.

Currently, there are approximately 35 ranch/dairy farms still operating on PRNS public lands. These private enterprises encompass a whopping 38% of PRNS land. They pay no property taxes. They are heavily subsidized by my tax dollars for personal profit while destroying natural habitat and displacing native species of plants and animals. According to the NPS August 2019 Environmental Impact Study (EIS), these private businesses "are causing extensive environmental damage", since much of the land they run their livestock on is consistently overgrazed. I find it astounding that according to NPS documents specific to PRNS, cattle and dairy cows on PRNS out-populate native Tule elk by 10:1. Despite this, the Tule elk are killed whenever they step on public PRNS land that these private enterprises are using. Also, NPS 2010 documents reveal that the cattle and dairy industries on PRNS produce over 133 hundred million tons of manure a year and account for 62% of carbon dioxide emissions (over 20 thousand metric tons).

Pt. Reyes National Seashore, which was once a rare coastal prairie ecosystem, has been transformed by 6,000 beef and dairy cows that eat, trample, and defecate on public PRNS land and the adjacent Golden Gate National Recreational Area (GGNRA) land 365 days a year. These ranch/dairy operations share the Seashore with one hundred native plant and animals species listed as rare, and threatened. These businesses continue to destroy a large portion of this unique habitat and associated species for personal gain. They also feel strongly that their businesses are entitled to be supported at taxpayers expense.

This is totally unacceptable.

The NPS pays well over 1/4 million dollars a year to help subsidize these 35 ranch/dairy operations. In contrast, over 2.5 million people visit PRNS every year, infusing literally hundreds of million dollars annually to the area. The NPS should be serving these 2.5 million visitors, rather than continue to serve the 35 ranch/dairy operations and push public interests far to the background.

As such, it makes complete business and environmental sense that the NPS take their responsibility for public service seriously, spending our tax money appropriately. It is the duty of the NPS to serve the public interest and not that of private for profit businesses at taxpayers expense. I strongly encourage the NPS to reject its A, B, C, D and E Point Reyes Seashore Draft Management Plans and adopt its Plan F. Plan F is the only plan that places the welfare of this tax-funded public treasure ahead of the unveiled benefit for 35 private ranch/dairy farm businesses. Plan F will secure for perpetuity, the restoration and preservation of the unique costal grassland environment, allowing all native plant and animal species to recover. All if this will benefit the public and be in complete compliance with the 1962 Congressional vision for PRNS in order to save and preserve, for the purposes of public recreation, benefit, and inspiration, a portion of the diminishing seashore of the United States that remains undeveloped.

Respectfully submitted, Sharma Gaponoff California and Federal taxpayer and frequent PRNS visitor

#5194

Name: McCann, Ellen

Correspondence: Stop favoring wildlife over cattle. Cattle aren't going to become extinct. Public land was intended to be just that, public land. We have very little say about how our land is used. Leasing to cattle ranchers is not a good use of public land. My choice, Tule deer over cows.

I read that only substantive comments will be considered. I'm just an every day citizen who is extremely concerned about the stewardship of our planet. It appears that we aren't doing a good job.

If you want substantive comments, listen to the scientists not the ranchers. It's time for the lawmakers to stand up for the people and do their job which is to look out for OUR best interest.

I don't know how many of these comments I fill out in a month; too many.

Do what you believe to be right. I vote for the planet.

#5195

Name: Otoole, Lynn

Correspondence: I care about protecting California's wildlife. I oppose the National Park Service's plan to kill native tule elk and expand commercial agriculture in Point Reyes National Seashore and Golden Gate National Recreation Area. I urge the National Park Service to instead restore the lands for wild animal habitat. That is why these publicly owned lands were created.



We should prioritize the preservation of our public lands and wildlife, not the economic interests of private ranchers. These commercial cattle ranches have serious negative environmental impacts on the park - polluting waterways, causing soil erosion, and harming the many endangered and threatened animals who live on Point Reyes. National parks exist to protect our natural resources and native wildlife. This park should be managed accordingly

#5196

Name: ROTH, TWILA

Correspondence: COMMERCIAL AGRICULTURE IS NOT NECESSARY HERE. THERE ARE MANY OTHERS PLACES AVAILABLE. PLEASE LEAVE THIS ARE FOR THE ELKS!!

#5197

Name: Severinghaus, Jean

Correspondence: I support wise access of biking to the Pt Reyes National Seashore, specifically for the following: 1) to enable people to enjoy this beautiful part of the County by bike, 2) to get people on bicycles off of busy roads, and onto pathways, trails, and unpaved ranch roads, 3) to create new loop options, and 4) to improve connectivity to existing routes on and adjacent to the Seashore.

As conditions currently stand I cannot ride my bicycle to access and to enjoy the seashore lands because it is unsafe to share the roads with car drivers.

And if I drive a car to bring a bike on a rack, I cannot make a simple loop outing by bike such as at the Estero Trail: I would like to do such a safe bike ride away from cars.

With global warming it is more critical than ever that we be able to access our public Park lands without driving a car. With non-car ranch roads connecting to get to the Seashore, and an electric bike, I would be able to access and enjoy the Seashore with my younger stronger family members! That would make us all happy.

Thank you.

#5198

Name: Grant, Carmen

Correspondence: The only 4 footed animals in these national treasures, should be the wildlife, NOT domestic 4 footed animals.

#5199

Name: NOWLAIN, ROB

Correspondence: Pt Reyes to my mind is a special place in Marin County. Due to the different geology it has a feel of another place. This is one of the reasons I love to hike there. However it is a ridiculous place to go for a mountain bike ride as there are so few places to go. This is a shame since mountain bikes are such a good way to enjoy the headlands, hills and the views. Thank you for your consideration.

#5200

Name: oster, darlene

Correspondence: most people come to Pt Reyes to see the Elk and not the cows.....cows dirty the water for wildlife of all types...No one should profit on public lands or disrupt wildlife even on there own land...

#5201

Name: Hickey, Deborah

Correspondence: Protect our Elk from culling for the benefit of ranchers. Beef is on the way out. Protecting our environment and national park's native wildlife matters. Shame if you sell it out to an industry which is only harmful to it!

#5202

Name: Abate, Johanna

Correspondence: I urge the NPS to adopt Alternative F, which would discontinue farming and ranching opportunities in the park and expand visitor opportunities. The preservation of native wild species must take precedence over farming and ranching activities. Grazing negatively affects ecosystems, causing water pollution and soil erosion, spreading invasive species and disease, and harming endangered species.

Please adopt Alternative F!

Thank-you for your consideration of this matter.

#5203

Name: Durkin, Barbara

Correspondence: Please adopt option F. Allow the native Elk population to exist as they currently do without killing any of them.

#5204

Name: Yarnell, cheri

Correspondence: I am opposed to the plan to assonate elk to benefit ranchers, I would hope that elk would be part of a natural ecosystem and not devalued for the benefit of a few.

#5205

Name: Townsend, Cherie

Correspondence: Save nature

#5206

Name: Lyon, Rachael

Correspondence: Commercial agriculture should NOT be given priority over wildlife. Cattle ranching is one of the biggest contributors to climate change and is endangering the lives of ALL living Beings. It is time to protect nature and wildlife over commercial interests!!! Thank you.

#5207

Name: Maslin, Linda

Correspondence: The goal of our national parks is to protect wildlife and preserve our wildlands - not financially benefit animal agriculture. I have always cared about protecting California's wildlife. I oppose the National Park Service's plan to kill native tule elk and expand commercial agriculture in Point Reyes National Seashore and Golden Gate National Recreation Area. I urge the National Park Service to instead restore the lands for wild animal habitat.

We should prioritize the preservation of our public lands and wildlife, not the economic interests of private ranchers. These commercial cattle ranches have serious negative environmental impacts on the park – polluting waterways, causing soil erosion, and harming the many endangered and threatened animals who live on Point Reyes. National parks exist to protect our natural resources and native wildlife. This park should be managed accordingly.

#5208

Name: Ayala, Mark

Correspondence: I'm writing to support the public access and bicycling improvements outlined under Alternatives B, C, D, E, and F. I strongly support proposals that would lead to the planning and implementation of bicycling routes on trails, ranch roads, and pathways throughout the planning area, including but not limited to: 1) a connection between Devil's Gulch and Platform Bridge Road using existing ranch roads, 2) a connection between Bolinas Ridge Trail at Olema Hill and Point Reyes Station to serve as an interim connection for the Cross Marin Trail, 3) a connection between Bolinas Ridge Trail and Five Brooks Stables using existing ranch roads 4) a connection between Drakes Estero and Abbotts Lagoon Trail using existing ranch roads, 5) a connection between Marshall Beach Trailhead and Pierce Point Road using existing ranch roads, and 6) an Estero Trail loop using existing ranch roads. I encourage NPS to collaborate with ranchers and other stakeholders to educate the public and address concerns related to public access on working ranch lands.

The improvements outlined above would enable and encourage me to visit the Seashore more regularly-and by bike, rather than car. I would feel much safer riding in the Seashore and surrounding areas on trails, pathways, and ranch roads, rather than on roads shared with fast-moving vehicular traffic. Bicycling opportunities are currently very limited and fragmented, so any improvements in connectivity and the creation of new loop options would enable me to enjoy more of the Seashore and surrounding areas by bike.

#5209

Name: Gulseth , Geralyn

Correspondence: Please protect native elk in Point Reyes National Seashore.

I was shocked to learn that the NPS is planning to kill elk to make more room for ranching. This is inhumane and unnecessary.

Farmed animals already significantly outnumber the elk and increased ranching can have harmful effects on the land.

In addition, Many visitors come to the park to see the elk. All Americans are stakeholders in these beautiful lands and wildlife.

Please reject this plan.

#5210

Name: Banaszynski, Tracy

Correspondence: To NPS Staff,

Thank you for all you do to responsibly steward the public park lands in your care. I appreciate your service.

I am writing to respectfully and strongly oppose the killing of elk in Point Reyes National Seashore. Additionally, I do not believe ranchers should be given a new lease to graze cattle on the land. When there is a conflict between wildlife and farmed animals on National Park Land, wildlife must be given priority in our protection of them. The preservation of native wild species must take precedence over farming and ranching activities. We must remain

mindful that we need biodiversity for our survival as humans and that means protecting natural spaces that serve as habitats for other animals, plants, and insects. Grazing negatively affects ecosystems, causing water pollution and soil erosion, spreading invasive species and disease, and harming endangered species. Please protect Point Reyes National Seashore as a sanctuary for wildlife and for passive recreation.

Thank you for taking the time to read my comment.

Sincerely, Tracy Banaszynski

#5211

Name: Mann, Doreen

Correspondence: The elk have been around a lot longer than the ranchers. I am so sick of people who feel wildlife interferes with their living like ranchers but it is the rancher who is affecting their lives.. They wanted the horses removed, elk, wolves, anything else they want removed. I am sick of people not trying to live along with wildlife. Save these animals !!!

#5212

Name: Laur, Janet

Correspondence: The deer are native. They have a right to live. We can't keep killing animals to make profits. Have a heart, be kind.

#5213

Name: Martinez , Kathleen

Correspondence: I do not support the needless killing of tule elk in Point Reyes, CA. I frequent National Parks to enjoy the beauty of nature and the beings who inhabit it. Please do not hurt the animals residing in the park.

#5214

Name: Daly, Tara

Correspondence: I oppose the National Park Service's plan to kill native tule elk and expand commercial agriculture in Point Reyes National Seashore and Golden Gate National Recreation Area. I urge the National Park Service to instead do the right thing and restore the land to wildlife.

The preservation of wildlife should be more important than the economic interests of the wealthy. We need to act now to protect our environment before it's too late.

Sincerely,

Tara Daly

#5215

Name: Kowalewski, Mary

Correspondence: I am writing in support of protecting the tule elk herds at Point Reyes National Seashore.

The National Park Service was established to "conserve the scenery and the natural and historic objects and the wild life therein and leave them unimpaired for the enjoyment of future generations."

The tule elk first roamed in this area 10,000 years ago. The elk have been saved from extinction.

Ranching began here less than 200 years ago.

It's time to consider ending the ranch leases if the ranchers are unable to coexist with the elk herds.

Thank you.

#5216

Name: Dorcas-Werner, Dawna

Correspondence: Please find a way to share the land. Elk have just as much of a right to live as cattle. Wildlife shouldn't be killed just because they've wandered into an area with other animals.

#5217

Name: Turner, Lisa

Correspondence: I think we should remember these elk have been on the land long before we all came to be. Focus on small tourism impact where people would come visit and sit and watch these elk. Spend tourism dollars in these communities and everyone stop being so greedy and uncaring with how the land is managed. We all should take a deep breath and observe the quiet stillness of pure freedom

#5218

Name: Wood, Neila

Correspondence: LEAVE the ELK ALONE- -I am SICK and TIRED of the DAMN CATTLE RANCHERS taking everything away from the WILDLIFE- -this LAND belongs to the American People- -NOT YOU or your DAMN COWS! The NPS needs to get some BALLS and STAND UP to these BULLY'S- -I can see a cow anytime but to truly see a magnificent animal like the TULE ELK is quite an experience! Say NO to the cattle ranchers!

#5219

Name: N/A, N/A

Correspondence: I care about protecting California's wildlife. I oppose the National Park Service's plan to kill native tule elk and expand commercial agriculture in Point Reyes National Seashore and Golden Gate National Recreation Area. I urge the National Park Service to instead restore the lands for wild animal habitat. We should prioritize the preservation of our public lands and wildlife, not the economic interests of private ranchers. These commercial cattle ranches have serious negative environmental impacts on the park - polluting waterways, causing soil erosion, and harming the many endangered and threatened animals who live on Point Reyes National parks exist to protect our natural resources and native wildlife This park should be managed accordingly.

#5220

Name: N/A, N/A

Correspondence: I am writing to make sure you take a stand to protect wildlife. Point Reyes National Seashore's preferred alternative hands over our public land to 24 ranching families. I visit the park to see wildlife, NOT the cows. I am AGAINST ranching in the seashore and want you to support Alternative F- - the only true alternative that will protect the land, the water, the biodiversity and the Tule Elk.

#5221

Name: Olenick, Roberta

Correspondence: I strongly support Alternative F, No Ranching, for Point Reyes National Seashore. This is a special area that I have visited on a number of occasions to view wildlife, including the native Tule elk.

The effects of cattle grazing, including associated calls for culling the elk, the impacts of proposed diversifying agriculture within the seashore and other developments allowed and/or promoted in the other alternatives all have significant negative impacts on the native plants and animals of the Seashore, water quality, soil/land protection - and visitor experience.

As a natural area established for the enjoyment of the general public (i.e. not just of ranchers and farmers) who flock to the area for wildlife viewing, hiking and other nature-related activities, it is time to return the Seashore back to nature.

The EIS says that the Seashore's land, water and wildlife would benefit were ranching to "cease."

I say, let the ranching cease.

#5222

Name: Rodriguez, Levinson

Correspondence: Do the right thing

#5223

Name: Marshall, Richard

Correspondence: I recently toured the Pt. Reyes National Seashore with some out of town visitors. They wanted to see the Tule Elk. As we drove through the area they mentioned how beautiful the area was and how nice it would be if the park could replace the unattractive ranches. I'm not sure they ever believed me when I tried to explain that the ranches were part of the park. They were certain that industrial farming would never be allowed in a national park such as ours. Unfortunately, we seem to be headed in the wrong direction. The natural environment will be sacrificed for the benefit of companies if the park service moves ahead with their plan to extend ranch leases and reduce the Elk herds.

Please use the same good judgment which was used when Johnson's Oysters was closed. The park is intended for nature, not commercial enterprises to profit.

Thank you, Richard Marshall

#5224

Name: Brouillet, Louis

Correspondence: I'm writing to support the public access and bicycling improvements outlined under Alternatives B, C, D, E, and F. I strongly support proposals that would lead to the planning and implementation of bicycling routes on trails, ranch roads, and pathways throughout the planning area, including but not limited to: 1) a connection between Devil's Gulch and Platform Bridge Road using existing ranch roads, 2) a connection between Bolinas Ridge Trail at Olema Hill and Point Reyes Station to serve as an interim connection for the Cross Marin Trail, 3) a connection between Bolinas Ridge Trail and Five Brooks Stables using existing ranch roads 4) a connection between Drakes Estero and Abbotts Lagoon Trail using existing ranch roads, 5) a connection between Marshall Beach Trailhead and Pierce Point Road using existing ranch roads, and 6) an Estero Trail loop using existing ranch roads. I encourage NPS to collaborate with ranchers and other stakeholders to educate the public and address concerns related to public access on working ranch lands.

The improvements outlined above would enable and encourage me to visit the Seashore more regularly-and by bike, rather than car. I would feel much safer riding in the Seashore and surrounding areas on trails, pathways, and ranch roads, rather than on roads shared with fast-moving vehicular traffic. Bicycling opportunities are currently very limited and fragmented, so any improvements in connectivity and the creation of new loop options would enable me to enjoy more of the Seashore and surrounding areas by bike

#5225

Name: Taylor, Janee

Correspondence: I oppose the National Park Service's plan to kill native tule elk in Point Reyes National Seashore and Golden Gate National Recreation Area. I urge the National Park Service to preserve our land, land that belongs to the American people, for wild animal habitat. Public land should be for wildlife and not for cattle ranchers whose only interest is profit.

#5226

Name: Sewald, Michelle

Correspondence: Does National Park or protected lands no longer mean anything? It has now become more important to let ranchers dictate where their livestock can graze than putting aside land that should be protected and enjoyed by everyone. Not to mention cattle and sheep are horrendously hard on the land and bring absolutely no biodiversity. Enough with a dying industry...let's bring balance back to the planet.

#5227

Name: Hassall, Michael

Correspondence: Plan F is the only alternative that will preserve and protect the native species of the park.

The ranchers were paid millions and given dozens of years to wind up their operations.

Why this even merits discussion defies logic.

#5228

Name: Lee, Heather

Correspondence: Dear Acting Director Smith: I am writing to submit my comments on the Point Reyes National Seashore General Management Plan Amendment Draft Environmental Impact Statement.

Under the Point Reyes Act, the Point Reyes National Seashore is to be managed for "maximum protection, restoration, and preservation of the natural environment." Prioritizing commercial agricultural leases, as currently is contemplated for these public lands, is inconsistent with the Act.

NEPA requires an equal, thorough and full evaluation of each action alternative. However, the current document improperly supports alternatives that perpetuate environmentally damaging ranching alternatives without sufficient analysis of the degradation these alternatives cause. Ranching has significant adverse environmental impacts to water quality, air quality, climate change, native species and their habitat (including species protected under the Endangered Species Act, the Migratory Bird Treaty and other laws) but fails sufficiently to evaluate these impacts. Foreseeable secondary impacts associated with animal agriculture, including transportation, water supply, as well as significant adverse impacts associated environmental justice and social issues related to subsidized animal agriculture also require analysis that has not been meaningfully provided. The document currently exhibits an improper bias toward continued and expanded ranching, without fully and fairly considering environmentally superior alternatives that will reduce or eliminate this unsustainable use.

Under federal laws governing the National Seashore, natural values, native wildlife, public access and enjoyment should take priority over commercial activities at Point Reyes. Animal agriculture, which is heavily subsidized at great taxpayer expense, is not economically or environmentally sustainable. The Point Reyes ranches enjoy not only subsidized grazing fees and housing, but also taxpayer-funded infrastructure and road improvements, and publicly funded projects.

Tule elk are an important native species, and a historical resource of great significance at Point Reyes. Their recovery is a result of successful native ecosystem restoration, which is a key element of the Park Service's mission. Tule elk should be allowed to roam free and forage in the park - not shot, removed, cruelly fenced to prevent them accessing water sources or otherwise improperly treated as a "problem" merely because they compete with non-native invasive domestic species. The Tule elk, not the ranched farm animals, are natural inhabitants of this land and should not be killed to perpetuate an industry that is not sustainable, destroys the native ecosystem, causes devastating and unmitigable harm to the environment and causes cruel treatment of domestic animals and wildlife. Cattle are the seashore's primary source of greenhouse gases; therefore, the Park Service's preferred alternative is inconsistent with its own "Climate Friendly Parks" plan.

Cattle ranching should only be allowed to the extent that it is fully consistent with preserving the natural environment, National Park purposes and federal law and regulations. Agricultural activities such as mowing and grazing must be prohibited to avoid harm to endangered species or wildlife habitat, impairment of water and air quality and other adverse impacts. Such activities also cause excessive erosion and the spread invasive plants/diseases and should be substantially reduced or avoided.

Any reasonable analysis would recognize that the animal agriculture should be amortized out of Point Reyes and the natural habitat restored. Planting artichokes or other row crops will attract birds and other native wildlife. In contrast, expanded ranching of cattle or any other domestic animals would only cause new wildlife conflicts, greater environmental damage and waste of taxpayer funds.

I appreciate the opportunity to comment. I urge the National Park Service to evaluate, fully consider and implement an alternative that will recognize the impropriety of continue or expanded ranching at Point Reyes and will restore and preserve this precious national treasure.

Very truly yours,

Heather Lee

#5229

Name: Page, Erik

Correspondence: I'm writing to support the public access and bicycling improvements outlined under Alternatives B, C, D, E, and F. I strongly support proposals that would lead to the planning and implementation of bicycling routes on trails, ranch roads, and pathways throughout the planning area, including but not limited to: 1) a connection between Devil's Gulch and Platform Bridge Road using existing ranch roads, 2) a connection between Bolinas Ridge Trail at Olema Hill and Point Reyes Station to serve as an interim connection for the Cross Marin Trail, 3) a connection between Bolinas Ridge Trail and Five Brooks Stables using existing ranch roads 4) a connection between Drakes Estero and Abbotts Lagoon Trail using existing ranch roads, 5) a connection between Marshall Beach Trailhead and Pierce Point Road using existing ranch roads, and 6) an Estero Trail loop using existing ranch roads. I encourage NPS to collaborate with ranchers and other stakeholders to educate the public and address concerns related to public access on working ranch lands.

The improvements outlined above would enable and encourage me to visit the Seashore more regularly-and by bike, rather than car. I would feel much safer riding in the Seashore and surrounding areas on trails, pathways, and ranch roads, rather than on roads shared with fast-moving vehicular traffic. Bicycling opportunities are currently very limited and fragmented, so any improvements in connectivity and the creation of new loop options would enable me to enjoy more of the Seashore and surrounding areas by bike.

#5230

Name: Pane, Brenda



Correspondence: Please don't permit elk to be killed for the expansion of agricultural activities at Point Reyes. Agricultural activities should be decreased.

#5231

Name: Mayeri, Beverly

Correspondence: Methane gas poses a serious danger to our climate because it traps heat in the atmosphere at more than 80 times the rate of carbon dioxide. Since cows belch methane and grass fed cows belch more than corn fed cows, it has been established that livestock produce 14 -18% of the greenhouse gases that cause global warming, more than cars, planes, and all other forms of transport put together. Our current system of meat and milk production is extremely damaging and we have to change how we think about cattle and cows because of the existential crisis of our planet. If we want our children to inherit a livable world and we want the oceans to be healthy and we want to protect the planet and diversity of living things on earth we need to make hard choices now like giving up all cow and cattle grazing on Pt Reyes National Park. Choosing packet F is the right choice because the mission of national parks is to protect native species, and cattle are harming the air, land, water and wildlife of the national seashore.

I have gotten information about cows' production of methane from [www.ecowatch.com](http://www.ecowatch.com), [www.scienceabc.com](http://www.scienceabc.com), [www.timeforchange.org](http://www.timeforchange.org)

#5232

Name: Volk-Anderson, Virginia

Correspondence: National parks exist to protect our natural resources and native wildlife. Since I moved to California, nearly 40 years ago, Pt. Reyes National Seashore has been a much loved destination and the park I have visited most frequently. And my favorite hike has been the Tomales Point Trail and the chance to see the iconic Pt. Reyes tule elk. I've taken a group of children from a Sacramento food bank program there and this summer walked the trail with my grandchildren, ages 9 and 3. We were all delighted to view the elk in their native habitat. I doubt that anyone visits Pt. Reyes to view the dairy farms and ranches that pollute this amazing natural resource. We should prioritize the preservation of our public lands and wildlife, not the economic interests of private ranchers I strongly oppose the National Park Service's plan to kill native tule elk and expand commercial agriculture in Point Reyes and Golden Gate National Recreation Area. I urge the National Park Service to instead restore the lands for wild animal habitat.

#5233

Name: Williams, Gerry

Correspondence: Wildlife can exist only in specific places that, due to human encroachment, are dwindling to next to nothing. This area must be preserved to save the Elk and other animals that live there.

On the other hand, agriculture to serve humans can and does exist most everywhere on earth. Please prize the wildlife over the agriculture which doesn't have to be produced in this location.

#5234

Name: Drechsler, Kyle

Correspondence: I'm writing to support the public access and bicycling improvements outlined under Alternatives B, C, D, E, and F. I strongly support proposals that would lead to the planning and implementation of bicycling routes on trails, ranch roads, and pathways throughout the planning area, including but not limited to: 1) a connection between Devil's Gulch and Platform Bridge Road using existing ranch roads, 2) a connection between Bolinas Ridge Trail at Olema Hill and Point Reyes Station to serve as an interim connection for the Cross Marin Trail, 3) a connection between Bolinas Ridge Trail and Five Brooks Stables using existing ranch roads 4) a connection between Drakes Estero and Abbotts Lagoon Trail using existing ranch roads, 5) a connection between

Marshall Beach Trailhead and Pierce Point Road using existing ranch roads, and 6) an Estero Trail loop using existing ranch roads. I encourage NPS to collaborate with ranchers and other stakeholders to educate the public and address concerns related to public access on working ranch lands.

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#5235

Name: EDWARDS, Franziska

Correspondence: Please adopt Alternative F to discontinue farming and ranching opportunities in the park and expand visitor opportunities!

#5236

Name: Freid, Jocelyn

Correspondence: I'm writing to support the public access and bicycling improvements outlined under Alternatives B, C, D, E, and F. I strongly support proposals that would lead to the planning and implementation of bicycling routes on trails, ranch roads, and pathways throughout the planning area, including but not limited to: 1) a connection between Devil's Gulch and Platform Bridge Road using existing ranch roads, 2) a connection between Bolinas Ridge Trail at Olema Hill and Point Reyes Station to serve as an interim connection for the Cross Marin Trail, 3) a connection between Bolinas Ridge Trail and Five Brooks Stables using existing ranch roads 4) a connection between Drakes Estero and Abbotts Lagoon Trail using existing ranch roads, 5) a connection between Marshall Beach Trailhead and Pierce Point Road using existing ranch roads, and 6) an Estero Trail loop using existing ranch roads. I encourage NPS to collaborate with ranchers and other stakeholders to educate the public and address concerns related to public access on working ranch lands.

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#5237

Name: Maddux, Susanne

Correspondence: It's time to end ranching in our Northern California National Parks. This was not the intended use and I would like to see this land open to the public and natural habitat as the law intended and for the future of my children. Please vote F

#5238

Name: Stover, Susan

Correspondence: Please consider the fate and plight of eliminating the Tule Elk in Point Reyes. They are a wonder to behold.

In our ever more threatened world, animal welfare seems not to be a high priority, but their lives are paramount to them. It is a significant issue to me and many others, who do not think that any business, even long-established dairies have the moral right to cull animals that compete for their ability to make a profit.

Point Reyes is a nationally protected park, thanks in large part to your predecessors. Please don't let killing or removing wild animals in our protection be a part of your legacy.

Sincerely, Susan Stover

#5239

Name: Hughes, N/A

Correspondence: I would like you to choose Alternative F.

#5240

Name: N/A, N/A

Correspondence: I'm writing to support the public access and bicycling improvements outlined under Alternatives B, C, D, E, and F. I strongly support proposals that would lead to the planning and implementation of bicycling routes on trails, ranch roads, and pathways throughout the planning area, including but not limited to: 1) a connection between Devil's Gulch and Platform Bridge Road using existing ranch roads, 2) a connection between Bolinas Ridge Trail at Olema Hill and Point Reyes Station to serve as an interim connection for the Cross Marin Trail, 3) a connection between Bolinas Ridge Trail and Five Brooks Stables using existing ranch roads 4) a connection between Drakes Estero and Abbotts Lagoon Trail using existing ranch roads, 5) a connection between Marshall Beach Trailhead and Pierce Point Road using existing ranch roads, and 6) an Estero Trail loop using existing ranch roads. I encourage NPS to collaborate with ranchers and other stakeholders to educate the public and address concerns related to public access on working ranch lands.

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#5241

Name: Cleveland, Randall

Correspondence: A deal is a deal is a deal. Get the cattle ranch OFF public property- -they've had their time extensions. Elk belong there from centuries ago, before ranchers "stole" the land from wildlife. It's time to take it back and get cattle or any other livestock out of there.

#5242

Name: Stradal, Carmen

Correspondence: Dear National Park Service:

Please have a heart and protect the tule elk.

Sincerely, C. M. Stradal

#5243

Name: Fregonese, Joy

Correspondence: Stop killing our beautiful native animals!!!!

#5244

Name: Sloane, Judith

Correspondence: I care about protecting California's wildlife. I oppose the National Park Service's plan to kill native tule elk and expand commercial agriculture in Point Reyes National Seashore and Golden Gate National Recreation Area. I urge the National Park Service to instead restore the lands for wild animal habitat.

We should prioritize the preservation of our public lands and wildlife, not the economic interests of private ranchers. These commercial cattle ranches have serious negative environmental impacts on the park - polluting waterways, causing soil erosion, and harming the many endangered and threatened animals who live on Point Reyes. National parks exist to protect our natural resources and native wildlife. This park should be managed accordingly.

Thank you for speaking up for the elk who call Point Reyes home!

For the animals and all of us who will come see them

#5245

Name: Shoberg, Lu

Correspondence: I come from a farming family. We never had public land available to graze our cattle on. I see no reason why these farmers should either.

#5246

Name: Chung, Ruby

Correspondence: Please do not kill these elks to make a way for ranchers. They belong there whereas ranchers do not. Government should protect wildlife, not run for profit

#5247

Name: N/A, N/A

Correspondence: The introduction of domestic animals other than cattle to Point Reyes National seashore as well as monoculture farming of crops such as artichoke will have major detrimental impacts to the ecosystems in the park. As Point Reyes currently sits, it is one of the best places to photograph badgers, bobcats and coyotes in all of the western United States. The farming of small domestic animals such as goats, chickens and pigs will cause immediate conflict with the native carnivores, as the domestic animals will be predated and the ranchers will likely terminate the natives using depredation permits. Monocultures of any variety will also be detrimental to the Point Reyes ecosystems, as monoculture crops tend to decrease biodiversity at all levels in the ecosystem. Any large scale use of pesticides will be detrimental to the endangered Red-legged frogs, and even organic fertilizers and pesticides can have negative impacts on amphibians. It is in the best interest of the park and the general public to preserve Point Reyes in its present state, as there are very few places left in California where native wildlife still flourishes.

#5248

Name: Larson, Scott

Correspondence: I support adoption of Alternative F.

Congress did not intend to support the ranches that encompasses Point Reyes National Seashore in perpetuity.

Alternative F is the only alternative that is in keeping with the enabling legislation and stated purposes of the park.

#5249

Name: Mallari, Melissa

Correspondence: Do not kill the elks!

#5250

Name: Zaharias, Stephen

Correspondence: 09/18/2019 To Everyone This Concerns: The Point Reyes National Seashore in California is home to very small Elk herds. In 2018 the Limantour Elk heard = 174. In 2018 the Drakes Elk herd = 124. Yet, ranchers who desire to lease this land OWNED BY THE PUBLIC AT LARGE, wish to graze 5,500 cattle and have the right to shoot off the elk. THIS IS WRONG!!! This LAND BELONGS TO THE ELK. My tax dollars and the stipulated agreement is to KEEP THIS LAND FOR THE ELK. NO COW GRAZING AND NO KILLING OFF ANY OF THE ELK. - - - - Citizen Stephen Zaharias of Lompoc, California

#5251

Name: N/A, N/A

Correspondence: Please! Stop this senseless idea! I care about protecting California's wildlife. I strongly oppose the National Park Service's plan to kill native tule elk and expand commercial agriculture in Point Reyes National Seashore and Golden Gate National Recreation Area. I urge the National Park Service to instead restore the lands for wild animal habitat.

We should prioritize the preservation of our public lands and wildlife, not the economic interests of private ranchers. These commercial cattle ranches have serious negative environmental impacts on the park - polluting waterways, causing soil erosion, and harming the many endangered and threatened animals who live on Point Reyes. National parks exist to protect our natural resources and native wildlife. This park should be managed accordingly.

#5252

Name: Kuamoo, Carla

Correspondence: PLEASE, PLEASE DO NOT KILL THE ELK!!!! Do NOT ALLOW the ELK to DIE! PLEASE!!

#5253

Name: JACKSON, MARY LEE

Correspondence: THE PARKS AND THE ANIMALS IN THEM NEED TO BE PROTECTED. NOT SHOT AT.

#5254

Name: Perino, Nina

Correspondence: I care about protecting California's wildlife. I oppose the National Park Service's plan to kill native tule elk and expand commercial agriculture in Point Reyes National Seashore and Golden Gate National Recreation Area. I urge the National Park Service to instead restore the lands for wild animal habitat.

We should prioritize the preservation of our public lands and wildlife, not the economic interests of private ranchers. These commercial cattle ranches have serious negative environmental impacts on the park - polluting waterways, causing soil erosion, and harming the many endangered and threatened animals who live on Point Reyes. National parks exist to protect our natural resources and native wildlife. This park should be managed accordingly.

#5255

Name: Leber, Susan

Correspondence: adopt Alternative F, which would discontinue farming and ranching opportunities in the park and expand visitor opportunities

#5256

Name: Scott, Laura

Correspondence: I urge the National Park Service to protect tule elk. Their removal to make way for cattle grazing will reduce biodiversity for a food (beef) that is not necessary for our health and all major health and government bodies around the world agree is putting our planet in peril. Laura Scott

#5257

Name: Hammond , David

Correspondence: We should be preserving the diversity of wildlife as a priority over ranchers profiting from the degradation of public lands for their personal profit.

#5258

Name: DA SILVA, DANIEL

Correspondence: I'm writing to support the public access and bicycling improvements outlined under Alternatives B, C, D, E, and F. I strongly support proposals that would lead to the planning and implementation of bicycling routes on trails, ranch roads, and pathways throughout the planning area, including but not limited to: 1) a connection between Devil's Gulch and Platform Bridge Road using existing ranch roads, 2) a connection between Bolinas Ridge Trail at Olema Hill and Point Reyes Station to serve as an interim connection for the Cross Marin Trail, 3) a connection between Bolinas Ridge Trail and Five Brooks Stables using existing ranch roads 4) a connection between Drakes Estero and Abbotts Lagoon Trail using existing ranch roads, 5) a connection between Marshall Beach Trailhead and Pierce Point Road using existing ranch roads, and 6) an Estero Trail loop using existing ranch roads. I encourage NPS to collaborate with ranchers and other stakeholders to educate the public and address concerns related to public access on working ranch lands.

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#5259

Name: N/A, N/A

Correspondence: livestock has NO place in our reserves and parks . please let elks stay

#5260

Name: Carter, William

Correspondence: Dear People,

I am hoping you will take a closer look (research) at the matter in hand.

William S Carter

#5261

Name: Fusilier, Gilda

Correspondence: Leave the animals alone.

#5262

Name: Wyatt, Janet

Correspondence: NPS<

I am a former resident of California. I used to love going to Pt. Reyes National Park to smell the soothing ocean air, see the native plants because they were there and occasionally see the Tule elk. Most Americans love seeing native animals on our lands. Cows are not an animal that is native to America but has taken over most of our parks and forests. Typically ranchers are getting a sweetheart deal, increasing herds, harming the environment without accountability and not paying taxes for such amenities. Ranchers seem to think they deserve to be able to do business in this fashion. What other American can go onto Public Lands, start a farm and have no accountability for water degradation, stomping out native plants, and deprive the other animal life of food and water? We are at a time in history when we must take bold steps and stand up to the ranchers and phase out operations on our beloved parks. Climate change is a serious issue that must be addressed without much compromise to ranchers. I am sorry if they have done business for decades. The intent of the park was not to allow cattle grazing in perpetuity. You must phase out cattle grazing and allow the park to recover from the harms already done. Methane gas is a potent greenhouse gas that is contributing greatly to our planet's demise. Please take the bold steps needed to help reverse these harms. Our future generations are depending on your decisions today.

#5263

Name: Cater, Amy

Correspondence: Hello, I'm writing to support the public access and bicycling improvements outlined under Alternatives B, C, D, E, and F. I strongly support proposals that would lead to the planning and implementation of bicycling routes on trails, ranch roads, and pathways throughout the planning area, including but not limited to: 1) a connection between Devil's Gulch and Platform Bridge Road using existing ranch roads, 2) a connection between Bolinas Ridge Trail at Olema Hill and Point Reyes Station to serve as an interim connection for the Cross Marin Trail, 3) a connection between Bolinas Ridge Trail and Five Brooks Stables using existing ranch roads 4) a connection between Drakes Estero and Abbotts Lagoon Trail using existing ranch roads, 5) a connection between Marshall Beach Trailhead and Pierce Point Road using existing ranch roads, and 6) an Estero Trail loop using existing ranch roads. I encourage NPS to collaborate with ranchers and other stakeholders to educate the public and address concerns related to public access on working ranch lands.

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Thank you for your consideration and this opportunity to weigh in on this issue.

Amy Cater

#5264

Name: Mitchell, Martha

Correspondence: I am a retired Federal Employee and have experience in the contracting of the grazing rights contracts. The cattlemen are a greedy bunch and want to expand their grazing rights over the national park. This

is nothing more than a GREEDY GRAB of FEDERAL Land committed for the welfare of WILDLIFE- I want to know WHY do they think that they have the right to DEMAND grazing on FEDERAL LAND. They DON't NEED to graze there and have their own land to grow cattle. The contracts were given on Gov't land and were a great deal cheaper for them and now they want to expand that resource for GREED to make money at the expense of the Wildlife in these National Parks. The NPS is a coward who is caving in to the MONEY of the Cattlemen. SHAME on them!!!!!! They have an obligation to protect Wildlife NOT to cave in to the Cattlemen's Association!!!! SHAME!!!!

#5265

Name: Thornton, Tara

Correspondence: Point Reyes National Seashore is supposed to be managed under the Point Reyes Act for "maximum protection, restoration, and preservation of the natural environment." There's no mandate for prioritizing commercial agricultural leases on these public lands.

Right now the Point Reyes ranches enjoy not only subsidized grazing fees and housing, but also taxpayer-funded infrastructure and road improvements, and publicly funded projects. But commercial activities at Point Reyes should be required to accommodate native wildlife - not the other way around.

We need a new vision for the Seashore: No ranching. (Alternative D) Phase out the ranches. Disallow all commercial livestock in the park. Prioritize wildlife over domestic cattle. Biodiversity should not be sacrificed to private ranching, Restore wildlife habitat and native plant communities Repurpose historic ranch buildings for scientific research, interpretation and public education.

#5266

Name: McKinnell, James

Correspondence: While I respect the interests of ranchers in Point Reyes, the Tule Elk are an important national resource. Restoring wild land and encouraging populations of wild life for future generations should be a primary goal for the Point Reyes National Park.

I would encourage you to end ranching in Point Reyes.

However, I would suggest you provide some option for the national park service to actively manage the elk population. One possible outcome from ending ranching is significant elk herd growth. Allowing the NPS to manage the herds in a sustainable fashion is a responsible next step. Furthermore, I would encourage you to specifically define hunting as the preferred means of herd management. The elk herd management programs on the National Elk refuge in Jackson Wyoming have been an important component of responsible herd management that still allows American citizens to appreciate the Elk herds. The same should be done at Point Reyes.

The Tule Elk are an important resource that should be conserved and protected. Dairy and cattle farming are important to the American way of life, but they do not belong in Point Reyes national park.

#5267

Name: N/A, N/A

Correspondence: It is appalling that ranchers feel entitled to continue using land in a national park for their private businesses. Plus ranchers have been grazing cows in Point Reyes subsidized by American taxpayers. They pay less than ranchers would have to pay to graze their cows on private land.

Cows and other livestock destroy the environment, polluting water, eroding soil, and emitting climate-harming gases. Point Reyes is not a place to run livestock or grow commercial crops. Private ranching must not take



precedence over protecting beautiful Point Reyes National Park and its native tule elk. Please adopt Alternative F. Discontinue farming and ranching in Point Reyes National Park.

#5268

Name: cruz, john

Correspondence: I'm writing to support the public access and bicycling improvements outlined under Alternatives B, C, D, E, and F. I strongly support proposals that would lead to the planning and implementation of safe and separate bicycling routes on trails, ranch roads, and pathways throughout the planning area, such as: 1) a connection between Devil's Gulch and Platform Bridge Road using existing ranch roads, 2) a connection between Bolinas Ridge Trail at Olema Hill and Point Reyes Station to serve as an interim connection for the Cross Marin Trail, 3) a connection between Bolinas Ridge Trail and Five Brooks Stables using existing ranch roads 4) a connection between Drakes Estero and Abbotts Lagoon Trail using existing ranch roads, 5) a connection between Marshall Beach Trailhead and Pierce Point Road using existing ranch roads, and 6) an Estero Trail loop using existing ranch roads. I encourage NPS to collaborate with ranchers and other stakeholders to educate the public and address concerns related to public access on working ranch lands. This infrastructure must be created in a way that does not negatively impact working ranches or the natural environment.

Currently, the paved roads in the Seashore can be busy with cars at time. The roads are narrow and rough in places. As we see there are many collisions between autos and cyclists on roads elsewhere in the county. The improvements outlined above would enable and encourage me to visit the Seashore more by bike, rather than car. I would feel much safer riding in the Seashore and surrounding areas on trails, pathways, and ranch roads, rather than on roads shared with fast-moving vehicular traffic. Bicycling opportunities are currently very limited and fragmented, so any improvements in connectivity and the creation of new loop options would enable me to enjoy more of the Seashore and surrounding areas by bike.

#5269

Name: GIFFORD, DEBORAH

Correspondence: Revolting.

Why must humans continue to destroy that which GOD has blessed us with to serve himself?

This rate, there will be nothing left and the world demise portrayed on t.v. in many futuristic movies will become a reality.

Our children deserve better, as wells as their offspring.

#5270

Name: French, Katherine

Correspondence: Choose Alternative F -

"It is not what we have that will make us a great nation; it is the way in which we use it." -Theodore Roosevelt

If he were alive today, Theodore Roosevelt would be urging you to stop farming and ranching in the park and focus on expanding visitor opportunities.

The preservation of native wild species must take precedence over farming and ranching activities. Grazing negatively affects ecosystems, causing water pollution and soil erosion, spreading invasive species and disease, and harming endangered species.

By allowing farmers to use these lands, we will lose more biodiversity. This biodiversity is so important for current and future generations. For example, numerous studies have found that lower biodiversity helps the transmission of diseases from animals to humans (e.g. mad-cow disease, bird flu, and swine-flu).

Thank you for your consideration

#5271

Name: Bogdan Tejeda, Victoria

Correspondence: The EIS fails to mention the impacts of the alternatives on climate change. In fact, the term "climate change" does not appear at all in the document. This is a mistake that fails to adequately inform the public and fails the agency's duties under NEPA. Climate change is regarded as a reasonably foreseeable impact of a project, and this EIS's analysis of GHGs and climate change impacts of the alternatives fails. See 40 C.F.R. §§ 1508.7 (defining "cumulative impact"), 1508.8 (defining "effects" as including direct and reasonably foreseeable indirect effects), 1508.25(c) (providing that EISs must consider direct, indirect, and cumulative impacts).

The EIS only blithely provides that "While emissions of criteria pollutants and greenhouse gases would vary among the alternatives, these emissions would continue to be a small contributor to overall impacts when compared to emission sources and transport of emissions from outside the planning area." EIS at ix. At this stage approaching the climate crisis, all projects that contribute greenhouse gases (GHGs) must be weighed. See Fourth National Climate Assessment, USGCRP (2018) <https://nca2018.globalchange.gov/>. Even incremental impacts to climate change are significant. See *Mass. v. Env't Prot. Agency*, 549 U.S. 497, 524 (2007) (the smallest GHG emission- -along with the emissions of other reasonably foreseeable actions- -incrementally leads to global climate change.).

It is helpful that the EIS provides a snapshot of the CO<sub>2</sub>e reductions associated with each alternative's livestock operations. See, e.g., EIS 192-93. This information is not enough, though. Associated ranch activities must be factored into the analyses of alternatives. Asserting that "[t]he additional time and cost of analyzing the emissions using methods that are more detailed would not be informative to decision making" is false and unlawful. EIS at 189. Cumulative impacts of each alternative need to be taken into account, even if the largest GHG contributors are regional. See *Ctr. for Biological Diversity v. Nat'l Highway Traffic Safety Admin.*, 538 F.3d 1172, 1215-1217 (9th Cir. 2008) (finding that "[t]he impact of greenhouse gas emissions on climate change is precisely the kind of cumulative impacts analysis that NEPA requires agencies to conduct"); *High Country Conservation Advocates v. United States Forest Serv.*, No. 13-CV-01723-RBJ, 2014 WL 2922751, at \*8-11, 13-15 (D. Colo. June 27, 2014) (holding that it was arbitrary and capricious for federal agencies to omit analysis of GHG emissions and related costs in EISs for mining exploration projects).

Last, none of alternatives require GHG reductions. This must be corrected. The EIS suggests measures, such as manure management, that are practical and could be required. See EIS at 190.

#5272

Name: Gaede, Marnie and Marc

Correspondence: No ranching. (Alternative F) Phase out the ranches. Disallow all commercial livestock in the park. Prioritize wildlife over domestic cattle. Biodiversity should not be sacrificed to private ranching, Restore wildlife habitat and native plant communities Repurpose historic ranch buildings for scientific research, interpretation and public education.

#5273

Name: Heiman, Phillip

Correspondence: I'm writing to support the public access and bicycling improvements outlined under Alternatives B, C, D, E, and F. I strongly support proposals that would lead to the planning and implementation of

bicycling routes on trails, ranch roads, and pathways throughout the planning area, including but not limited to: 1) a connection between Devil's Gulch and Platform Bridge Road using existing ranch roads, 2) a connection between Bolinas Ridge Trail at Olema Hill and Point Reyes Station to serve as an interim connection for the Cross Marin Trail, 3) a connection between Bolinas Ridge Trail and Five Brooks Stables using existing ranch roads 4) a connection between Drakes Estero and Abbotts Lagoon Trail using existing ranch roads, 5) a connection between Marshall Beach Trailhead and Pierce Point Road using existing ranch roads, and 6) an Estero Trail loop using existing ranch roads. I encourage NPS to collaborate with ranchers and other stakeholders to educate the public and address concerns related to public access on working ranch lands.

The improvements outlined above would enable and encourage me to visit the Seashore more regularly-and by bike, rather than car. I would feel much safer riding in the Seashore and surrounding areas on trails, pathways, and ranch roads, rather than on roads shared with fast-moving vehicular traffic. Bicycling opportunities are currently very limited and fragmented, so any improvements in connectivity and the creation of new loop options would enable me to enjoy more of the Seashore and surrounding areas by bike.

#5274

Name: N/A, N/A

Correspondence: Please rethink what you are doing here. Save the wildlife over ranching. Keep the Habitat wild and preserve what we have for the wildlife. PLEASE RETHINK WHAT YOU ARE DOING. Thank you for reading

#5275

Name: Goyer, Brandon

Correspondence: The idea of allowing cattle grazing into 1/3 of a National Seashore, displacing and negatively impacting the native species that live there, completely disregards the protected status of the area as a National Seashore. The National Park Service is charged with protecting this land in the public trust, not leasing it out to ranchers for a profit. I completely oppose any plans to allow ranching within the National Seashore, and implore the National Park Service to do its job to protect this area from commercial interests.

#5276

Name: Norstad, Mark

Correspondence: Although this is a canned response from MCBC, I'm not sure I could say it any better. My family and I love the Point Reyes National Seashore, and expanded bicycle access will make it that much better. Thanks, Mark.

I'm writing to support the public access and bicycling improvements outlined under Alternatives B, C, D, E, and F. I strongly support proposals that would lead to the planning and implementation of bicycling routes on trails, ranch roads, and pathways throughout the planning area, including but not limited to: 1) a connection between Devil's Gulch and Platform Bridge Road using existing ranch roads, 2) a connection between Bolinas Ridge Trail at Olema Hill and Point Reyes Station to serve as an interim connection for the Cross Marin Trail, 3) a connection between Bolinas Ridge Trail and Five Brooks Stables using existing ranch roads 4) a connection between Drakes Estero and Abbotts Lagoon Trail using existing ranch roads, 5) a connection between Marshall Beach Trailhead and Pierce Point Road using existing ranch roads, and 6) an Estero Trail loop using existing ranch roads. I encourage NPS to collaborate with ranchers and other stakeholders to educate the public and address concerns related to public access on working ranch lands.

The improvements outlined above would enable and encourage me to visit the Seashore more regularly-and by bike, rather than car. I would feel much safer riding in the Seashore and surrounding areas on trails, pathways, and ranch roads, rather than on roads shared with fast-moving vehicular traffic. Bicycling opportunities are currently

very limited and fragmented, so any improvements in connectivity and the creation of new loop options would enable me to enjoy more of the Seashore and surrounding areas by bike.

#5277

Name: N/A, N/A

Correspondence: As a lifelong Inverness resident, I have had access to trails I enjoyed freely as a child be taken from me by greedy equestrians collaborating with the National Park in closed door meetings. My dad told me that riding on the roads was not safe in the 1970s, and it has become significantly more dangerous with the advent of cell phones and other distractions coupled with increased speed limits and millions more drivers on these narrow roads. For over 35 years I have been a Fire Captain and EMT in West Marin, and have been on scene of many vehicle vs bike accidents. The bicyclist lost in every situation, many having to be flown out by helicopter to get definitive care at a hospital. Bicycling is my sport of choice since I was 3 years old, and the community benefits by me being in top fitness as a Firefighter and a leader. At one point in time, I was ambushed by 6 Rangers and a Sheriff (who drove to the ambush in 4 vehicles), saying I was causing erosion with my mountain bike on a formerly paved road in the wilderness. I was aghast, as they all know me by name, and know my ongoing commitment to bettering the lives of the community. After kidnapping my bike, holding it for ransom for 3 and 1/2 months, they extorted \$550 from me to return my bike. What kind of world do we live in where it is a crime to "Possess a bicycle in a Wilderness Area"? For the youth coming up today, I hope for a better, safer world, where law enforcement is utilized to go after real criminals such as the Mexican Drug Cartel doing massive grows in the National Park at threat to the environment and any casual passersby. I'm writing to support the public access and bicycling improvements outlined under Alternatives B, C, D, E, and F. I strongly support proposals that would lead to the planning and implementation of bicycling routes on trails, ranch roads, and pathways throughout the planning area, including but not limited to: 1) a connection between Devil's Gulch and Platform Bridge Road using existing ranch roads, 2) a connection between Bolinas Ridge Trail at Olema Hill and Point Reyes Station to serve as an interim connection for the Cross Marin Trail, 3) a connection between Bolinas Ridge Trail and Five Brooks Stables using existing ranch roads 4) a connection between Drakes Estero and Abbotts Lagoon Trail using existing ranch roads, 5) a connection between Marshall Beach Trailhead and Pierce Point Road using existing ranch roads, and 6) an Estero Trail loop using existing ranch roads. I encourage NPS to collaborate with ranchers and other stakeholders to educate the public and address concerns related to public access on working ranch lands.

#5278

Name: Chen, Bing

Correspondence: I'm writing to support the public access and bicycling improvements outlined under Alternatives B, C, D, E, and F. I strongly support proposals that would lead to the planning and implementation of bicycling routes on trails, ranch roads, and pathways throughout the planning area, including but not limited to: 1) a connection between Devil's Gulch and Platform Bridge Road using existing ranch roads, 2) a connection between Bolinas Ridge Trail at Olema Hill and Point Reyes Station to serve as an interim connection for the Cross Marin Trail, 3) a connection between Bolinas Ridge Trail and Five Brooks Stables using existing ranch roads 4) a connection between Drakes Estero and Abbotts Lagoon Trail using existing ranch roads, 5) a connection between Marshall Beach Trailhead and Pierce Point Road using existing ranch roads, and 6) an Estero Trail loop using existing ranch roads. I encourage NPS to collaborate with ranchers and other stakeholders to educate the public and address concerns related to public access on working ranch lands.

The improvements outlined above would enable and encourage me to visit the Seashore more regularly-and by bike, rather than car. I would feel much safer riding in the Seashore and surrounding areas on trails, pathways, and ranch roads, rather than on roads shared with fast-moving vehicular traffic. Bicycling opportunities are currently very limited and fragmented, so any improvements in connectivity and the creation of new loop options would enable me to enjoy more of the Seashore and surrounding areas by bike.

#5279

Name: McClure, Deborah

Correspondence: According to the original agreement for the Point Reyes National Seashore, ranching should be phased out completely. As a tax payer I expect my monies to be used as outlined in the original agreement therefore all ranching operations in the planning area need to be discontinued and visitor opportunities need to expand. The government has already paid the ranchers money for their ranches, so the ranches themselves are government property. And if the ranches are government property that means the ranchers are probably not paying property taxes but living free off the land. The ranchers have been paid and should have taken steps at that time to relocate their operations. The ranchers need to relocate to private lands and allow the other people of the United States to enjoy all of the Point Reyes National Seashore. It's time to enforce the original agreement! No more extensions!

#5280

Name: Barger, Matt

Correspondence: I am a member of the Marin Bicycling Coalition and an active cyclist. I support MBC's position on improving access and safety for cyclist in Point Reyes as suggested in alternatives B,C,D,E, and F.

#5281

Name: Leslie, Leslie

Correspondence: Point Reyes National Seashore is supposed to be managed under the Point Reyes Act for "maximum protection, restoration, and preservation of the natural environment." There's no mandate for prioritizing commercial agricultural leases on these public lands.

- Natural values, native wildlife, public access and enjoyment should take priority over commercial activities at Point Reyes.
- Tule elk are an important part of the landscape at Point Reyes. Their recovery is a result of successful native ecosystem restoration, which is a key element of the Park Service's mission. It's taken a lot of time, money and effort to restore tule elk to Point Reyes, the only national park where they live. Tule elk should be allowed to roam free and forage in the park - not shot, removed, fenced or treated as problem animals.
- Right now the Point Reyes ranches enjoy not only subsidized grazing fees and housing, but also taxpayer-funded infrastructure and road improvements, and publicly funded projects. But commercial activities at Point Reyes should be required to accommodate native wildlife - not the other way around.
- The Park Service shouldn't allow any new agricultural activities at Point Reyes. Planting artichokes or other row crops will attract birds. And introducing sheep, goats, pigs or chickens will attract native predators such as coyotes, bobcats and foxes. Expanded ranching would only create new wildlife conflicts.
- Cattle ranching should only be allowed if it's consistent with preserving the natural environment. And agricultural activities such as mowing shouldn't be allowed in park areas where they harm endangered species or wildlife habitat, impair water quality, cause excessive erosion or spread invasive plants/diseases.
- Cattle are the seashore's primary source of greenhouse gases. So the Park Service's preferred alternative is inconsistent with its own "Climate Friendly Parks" plan.

Please do the right thing. A National Park is for everyone. The animals should really come first . They were here first. Thank you, Leslie Leslie

#5282

Name: wilson, amelia

Correspondence: Regional Parks Association is a 67 year old organization spanning Alameda and Contra Costa counties who support the East Bay Regional Park District and other Bay Area environmental projects. We wish to be on record as supporting the no ranching alternative, phasing out the current owners whose 20 year lease has expired so that the national park service returns the area to the use it was intended - supporting wildlife and opportunity for the public to enjoy the natural environment.

Please approve the no ranching alternative.

Amelia Wilson, president

#5283

Name: colonius, cari

Correspondence: We are native Californian's (5th generation) that have enjoyed Point Reyes for many years.

I believe cattle to be detrimental to the land, especially Point Reyes. The native ecosystem should be restored to it's natural state and this can only be done if the livestock leave.

Thank you, Cari

#5284

Name: Raphael, Miles

Correspondence: I'm writing to support the public access and bicycling improvements outlined under Alternatives B, C, D, E, and F. I strongly support proposals that would lead to the planning and implementation of bicycling routes on trails, ranch roads, and pathways throughout the planning area, including but not limited to: 1) a connection between Devil's Gulch and Platform Bridge Road using existing ranch roads, 2) a connection between Bolinas Ridge Trail at Olema Hill and Point Reyes Station to serve as an interim connection for the Cross Marin Trail, 3) a connection between Bolinas Ridge Trail and Five Brooks Stables using existing ranch roads 4) a connection between Drakes Estero and Abbotts Lagoon Trail using existing ranch roads, 5) a connection between Marshall Beach Trailhead and Pierce Point Road using existing ranch roads, and 6) an Estero Trail loop using existing ranch roads. I encourage NPS to collaborate with ranchers and other stakeholders to educate the public and address concerns related to public access on working ranch lands.

The improvements outlined above would enable and encourage me to visit the Seashore more regularly-and by bike, rather than car. I would feel much safer riding in the Seashore and surrounding areas on trails, pathways, and ranch roads, rather than on roads shared with fast-moving vehicular traffic. Bicycling opportunities are currently very limited and fragmented, so any improvements in connectivity and the creation of new loop options would enable me to enjoy more of the Seashore and surrounding areas by bike.

Yes, I copied and pasted a form letter, but this in no way diminishes my strong support for access that would improve rider safety.

#5285

Name: N/A, Ali

Correspondence: I oppose the National Park Service's plan to kill native tule elk and expand commercial agriculture in Point Reyes National Seashore and Golden Gate National Recreation Area. Instead, I urge the National Park Service to restore the lands for wild animal habitat.

We should prioritize the preservation of our public lands and wildlife, not the economic interests of private ranchers. These commercial cattle ranches have serious negative environmental impacts on the park - polluting waterways, causing soil erosion, and harming the many endangered and threatened animals who live on Point Reyes. National parks exist to protect our natural resources and native wildlife. This park should be managed with that in mind.

#5286

Name: Gordon, Keith

Correspondence: As an American and a California I vehemently oppose the NPSs plan to kill native tule elk and expand commercial use of Point Reyes National Recreation Area.

The NPS must prioritize preserving and protecting what natural wildlife and animal habitat our country has left. Otherwise they serve no function.

When did management of national lands in this country become chiefly about making cattle ranchers and commercial interests happy? Is the NPS's job really to wipe away any 'inconvenience' to these profiteers who seek to use OUR public land to serve their own personal economic interests - like the native animals that were here long before their cattle. Cattle that pollute the water, erode the earth, and increase the ecologic pressure on the endangered animals who live in the park.

National parks exist to protect our natural resources and native wildlife. This park should be managed accordingly.

#5287

Name: Dwyer, Lindsay

Correspondence: I'm writing to support the public access and bicycling improvements outlined under Alternatives B, C, D, E, and F. I strongly support proposals that would lead to the planning and implementation of bicycling routes on trails, ranch roads, and pathways throughout the planning area, including but not limited to: 1) a connection between Devil's Gulch and Platform Bridge Road using existing ranch roads, 2) a connection between Bolinas Ridge Trail at Olema Hill and Point Reyes Station to serve as an interim connection for the Cross Marin Trail, 3) a connection between Bolinas Ridge Trail and Five Brooks Stables using existing ranch roads 4) a connection between Drakes Estero and Abbotts Lagoon Trail using existing ranch roads, 5) a connection between Marshall Beach Trailhead and Pierce Point Road using existing ranch roads, and 6) an Estero Trail loop using existing ranch roads. I encourage NPS to collaborate with ranchers and other stakeholders to educate the public and address concerns related to public access on working ranch lands.

The improvements outlined above would enable and encourage me to visit the Seashore more regularly-and by bike, rather than car. I would feel much safer riding in the Seashore and surrounding areas on trails, pathways, and ranch roads, rather than on roads shared with fast-moving vehicular traffic. Bicycling opportunities are currently very limited and fragmented, so any improvements in connectivity and the creation of new loop options would enable me to enjoy more of the Seashore and surrounding areas by bike.

#5288

Name: Falk, Frederick

Correspondence: I'm writing to support the public access and bicycling improvements outlined under Alternatives B, C, D, E, and F. I strongly support proposals that would lead to the planning and implementation of bicycling routes on trails, ranch roads, and pathways throughout the planning area, including but not limited to: 1) a connection between Devil's Gulch and Platform Bridge Road using existing ranch roads, 2) a connection between Bolinas Ridge Trail at Olema Hill and Point Reyes Station to serve as an interim connection for the Cross Marin Trail, 3) a connection between Bolinas Ridge Trail and Five Brooks Stables using existing ranch roads 4) a

connection between Drakes Estero and Abbotts Lagoon Trail using existing ranch roads, 5) a connection between Marshall Beach Trailhead and Pierce Point Road using existing ranch roads, and 6) an Estero Trail loop using existing ranch roads. I encourage NPS to collaborate with ranchers and other stakeholders to educate the public and address concerns related to public access on working ranch lands.

The improvements outlined above would enable and encourage me to visit the Seashore more regularly-and by bike, rather than car. I would feel much safer riding in the Seashore and surrounding areas on trails, pathways, and ranch roads, rather than on roads shared with fast-moving vehicular traffic. Bicycling opportunities are currently very limited and fragmented, so any improvements in connectivity and the creation of new loop options would enable me to enjoy more of the Seashore and surrounding areas by bike.

#5289

Name: Ungar, Jonathan

Correspondence: I strongly oppose the National Park Service's plan to kill native tule elk and expand commercial agriculture in Point Reyes National Seashore and Golden Gate National Recreation Area. I urge the National Park Service to instead restore the lands for wild animal habitat.

Our society should prioritize the preservation of our public lands and wildlife, not the economic interests of private ranchers. These commercial cattle ranching operations have serious negative environmental impacts: polluting waterways, causing soil erosion, and harming the many endangered and threatened animals who live on Point Reyes.

National parks exist to protect our natural resources and native wildlife; Point Reyes National Seashore and GGNRA should be managed accordingly.

#5290

Name: Chouinard, Fletcher

Correspondence: Point Reyes is one of those special places that deserve to be returned to its natural state and protected forever. Cattle farming is important, but cows can be raised anywhere. There's only one Point Reyes. It's time to give the grass and land back to the Elk.

#5291

Name: Shaw, Casey

Correspondence: Considerate Folks of the NPS

It has come to my attention that your proposed management plan for the Point Reyes Seashore has prioritized 24 individual, for profit entities, over generations of natural Flora & Fauna.

I haven't read the underlying foundational mandates of the NPS's primary role in this country, but I suspect placing profit above protection is not your mandate.

In life I look for litmus test moments as an indicator of appropriate choices or actions. The fact that I feel embarrassed for the NPS's current position to prioritize cattle over indigenous Elk is a clear sign the NPS has lost its compass bearings. I would encourage you to reflect for a few moments on the true purpose of the NPS, and then give yourself an honest scorecard rating on how well your choices regarding the Point Reyes Seashore management plan reflect this true purpose.

Thanks for your time and consideration. I sincerely hope you will continue the good work embodied in the idea of standing up for the landscapes, plants and species which have no voice in the political process.



Casey Shaw

#5292

Name: Vincenzi, Beba

Correspondence: Please save elks

#5293

Name: Beazley, Morris

Correspondence: I'm writing to support the public access and bicycling improvements outlined under Alternatives B, C, D, E, and F. I strongly support proposals that would lead to the planning and implementation of bicycling routes on trails, ranch roads, and pathways throughout the planning area, including but not limited to: 1) a connection between Devil's Gulch and Platform Bridge Road using existing ranch roads, 2) a connection between Bolinas Ridge Trail at Olema Hill and Point Reyes Station to serve as an interim connection for the Cross Marin Trail, 3) a connection between Bolinas Ridge Trail and Five Brooks Stables using existing ranch roads 4) a connection between Drakes Estero and Abbotts Lagoon Trail using existing ranch roads, 5) a connection between Marshall Beach Trailhead and Pierce Point Road using existing ranch roads, and 6) an Estero Trail loop using existing ranch roads. I encourage NPS to collaborate with ranchers and other stakeholders to educate the public and address concerns related to public access on working ranch lands.

The improvements outlined above would enable and encourage me to visit the Seashore more regularly-and by bike, rather than car. I would feel much safer riding in the Seashore and surrounding areas on trails, pathways, and ranch roads, rather than on roads shared with fast-moving vehicular traffic. Bicycling opportunities are currently very limited and fragmented, so any improvements in connectivity and the creation of new loop options would enable me to enjoy more of the Seashore and surrounding areas by bike.

#5294

Name: N/A, N/A

Correspondence: I support the public access and bicycling improvements outlined under Alternatives B, C, D, E, and F.

I strongly support proposals that would lead to the planning and implementation of bicycling routes on trails, ranch roads, and pathways throughout the planning area, including but not limited to: 1) a connection between Devil's Gulch and Platform Bridge Road using existing ranch roads, 2) a connection between Bolinas Ridge Trail at Olema Hill and Point Reyes Station to serve as an interim connection for the Cross Marin Trail, 3) a connection between Bolinas Ridge Trail and Five Brooks Stables using existing ranch roads 4) a connection between Drakes Estero and Abbotts Lagoon Trail using existing ranch roads, 5) a connection between Marshall Beach Trailhead and Pierce Point Road using existing ranch roads, and 6) an Estero Trail loop using existing ranch roads. I encourage NPS to collaborate with ranchers and other stakeholders to educate the public and address concerns related to public access on working ranch lands.

I would feel much safer riding in the Seashore and surrounding areas on trails, pathways, and ranch roads, rather than on roads which are far too narrow for bikes and cars to use at the same time.

I would ride my bike in the PT Reyes Seashore area on a regular basis if it was safe and separate from cars, and included some routes that are "relatively" flat. Thank you for soliciting comments.

#5295

Name: Pohl, Alyssum

Correspondence: I have a masters degree in International Environmental Policy from the Monterey Institute of

International Studies. I also went to veterinary school at Tufts University, and therefore have a keen understanding of both husbandry and ecology of dairy cattle and tule elk. My education provides strong recommendation AGAINST increasing dairy ranches in the Point Reyes National Seashore area, and MAINTAINING the Tule Elk reservation.

#5296

Name: Sykes, Wally

Correspondence: Public lands are under fierce pressure by exploitation interests and the livestock industry is particularly guilty of degrading our public forests, streams, and grass lands, a practice now underway for more than 100 years.

It is galling that even in our National Parks these interests hold sway at great cost to ecological and public good.

I urge the NPS to implement Alternative F and to:

Phase out the ranches. Disallow all commercial livestock in the park. Prioritize wildlife over domestic cattle. Biodiversity should not be sacrificed to private ranching, Restore wildlife habitat and native plant communities Repurpose historic ranch buildings for scientific research, interpretation and public education.

Our National Parks and Seashores are meant to preserve, protect and enhance culturally and environmentally vital qualities, not to aid in their destructive exploitation.

Please implement Alternative F!

P

#5297

Name: Vallejo, Jessie

Correspondence: The elk are native to the region and their numbers are small. Given issues of endangered species, extinctions, and the need to restore natural habitats and an ecological balance, we should be finding solutions that do not require systematic killings of endangered species like the elk. It behooves us to ensure that contemporary business practices like farming/ranching are not harmful to local species. We should question why the expense of prioritizing outdated (by more than a century) and ecologically unsustainable ranching methods is not being considered.

#5298

Name: Summers, Marcia

Correspondence: Please protect our Elk.

#5299

Name: Dutton, John

Correspondence: • Point Reyes National Seashore is supposed to be managed under the Point Reyes Act for "maximum protection, restoration, and preservation of the natural environment." There's no mandate for prioritizing commercial agricultural leases on these public lands.

• Natural values, native wildlife, public access and enjoyment should take priority over commercial activities at Point Reyes.

- Tule elk are an important part of the landscape at Point Reyes. Their recovery is a result of successful native ecosystem restoration, which is a key element of the Park Service's mission. It's taken a lot of time, money and effort to restore tule elk to Point Reyes, the only national park where they live. Tule elk should be allowed to roam free and forage in the park - not shot, removed, fenced or treated as problem animals.
- Right now the Point Reyes ranches enjoy not only subsidized grazing fees and housing, but also taxpayer-funded infrastructure and road improvements, and publicly funded projects. But commercial activities at Point Reyes should be required to accommodate native wildlife - not the other way around.
- The Park Service shouldn't allow any new agricultural activities at Point Reyes. Planting artichokes or other row crops will attract birds. And introducing sheep, goats, pigs or chickens will attract native predators such as coyotes, bobcats and foxes. Expanded ranching would only create new wildlife conflicts.
- Cattle ranching should only be allowed if it's consistent with preserving the natural environment. And agricultural activities such as mowing shouldn't be allowed in park areas where they harm endangered species or wildlife habitat, impair water quality, cause excessive erosion or spread invasive plants/diseases.
- Cattle are the seashore's primary source of greenhouse gases. So the Park Service's preferred alternative is inconsistent with its own "Climate Friendly Parks" plan.

#5300

Name: Gardner, Abe

Correspondence: I'm writing to support the public access and bicycling improvements outlined under Alternatives B, C, D, E, and F. I strongly support proposals that would lead to the planning and implementation of bicycling routes on trails, ranch roads, and pathways throughout the planning area, including but not limited to: 1) a connection between Devil's Gulch and Platform Bridge Road using existing ranch roads, 2) a connection between Bolinas Ridge Trail at Olema Hill and Point Reyes Station to serve as an interim connection for the Cross Marin Trail, 3) a connection between Bolinas Ridge Trail and Five Brooks Stables using existing ranch roads 4) a connection between Drakes Estero and Abbotts Lagoon Trail using existing ranch roads, 5) a connection between Marshall Beach Trailhead and Pierce Point Road using existing ranch roads, and 6) an Estero Trail loop using existing ranch roads. I encourage NPS to collaborate with ranchers and other stakeholders to educate the public and address concerns related to public access on working ranch lands.

The improvements outlined above would enable and encourage me to visit the Seashore more regularly-and by bike, rather than car. I would feel much safer riding in the Seashore and surrounding areas on trails, pathways, and ranch roads, rather than on roads shared with fast-moving vehicular traffic. Bicycling opportunities are currently very limited and fragmented, so any improvements in connectivity and the creation of new loop options would enable me to enjoy more of the Seashore and surrounding areas by bike.

#5301

Name: N/A, N/A

Correspondence: Please allow the elk grazing rights and do not cull them in the affected areas

#5302

Name: N/A, N/A

Correspondence: Commercial agriculture shouldn't be valued over wildlife. I oppose the National Park Service's plan to kill native tule elk and expand commercial agriculture in Point Reyes National Seashore and Golden Gate National Recreation Area. I urge the National Park Service to instead restore the lands for wild animal habitat. We should prioritize the preservation of our public lands and wildlife, not the economic interests of private ranchers. These commercial cattle ranches have serious negative environmental impacts on the park - polluting waterways,

causing soil erosion, and harming the many endangered and threatened animals who live on Point Reyes. National parks exist to protect our natural resources and native wildlife. This park should be managed accordingly. Thank you!

#5303

Name: N/A, N/A

Correspondence: Dear National Park Service,

First, thank you for providing Americans with access to wild and beautiful places to spend rejuvenating time outdoors. My family's life is immeasurably enriched by every minute we spend in our national parks. We've been to over half of them!

As a long-time Bay Area resident who makes frequent trips to Point Reyes (twice in the last 40 days!), I urge you to protect the Bay's remaining native species and adopt Alternative F. This plan discontinues farming and ranching opportunities in the park, to the benefit of this wildlife. As you know, grazing negatively affects ecosystems, causing water pollution and soil erosion, spreading invasive species and disease, and harming native (and often endangered) species.

Listen, I'm a big buyer of local dairy and produce, and will miss having Point Reyes represented in the marketplace. But these businesses will relocate to nearby pasture/fields, and wholesalers/retailers can continue to buy from a myriad of producers outside the park boundaries. It is absolutely worth it if we can make a dent in the relentless pursuit of human-focused activity in the Bay Area. We already have a massive footprint here though we're lucky enough to have preserved a meaningful amount of open space. We should aim to return some of that space to wildness whenever the opportunity arises- -here's one such opportunity.

The preservation of native wild species MUST take precedence over farming and ranching activities. This plan will also provide an increase in park visitors who will put dollars back into the area.

Thanks in advance for reading!

#5304

Name: Terry, Lauren

Correspondence: As a member of the California-based international animal protection nonprofit organization In Defense of Animals with over 250,000 supporters, I oppose the National Park Service plan to kill native Tule elk, grow commercial crops, and permit ranchers to add chickens, turkeys, sheep, pigs, and goats to their exploitative operations.

As national park land, this property was specifically set aside to protect, restore, and preserve the natural environment including the wild animals who live there. The original intention was to phase out dairy and cattle ranching, not add more crops or animals to increase ranching profits.

The proposed plan does not address the damage from grazing, including water-quality degradation and soil erosion. Also, adding new crops will create more conflicts with native wild animals.

Please abandon this inhumane and destructive plan. I urge you to restore the Seashore's Pastoral Zone for wild animal habitat and repurpose historic ranch buildings for scientific research, interpretation, and public education.

#5305

Name: Hancock, Melissa

Correspondence: Animal human conflict will always be a problem. But remember, the animals were there first. We, the humans, are encroaching upon them. We need to set in place a plan that will work for all involved.

#5306

Name: Gartland, Joel

Correspondence: Any improvements to allow and enable more and safer cycling in the park would be great and very much appreciated.

I would especially appreciate car-free connections from the Bolinas Ridge Trail to the park, which would really help wrt visiting the Seashore by bike, rather than car.

Joel Gartland

#5307

Name: haddon, susan

Correspondence: Please prioritize biodiversity and environmental health. Also, restore our coastal prairie habitat. And, please adopt "Alternative F".

My partner and I just returned from a visit to Point Reyes National Seashore. One of the highlights of our trip was seeing two Elk in the distance. Please protect them. Thank you! Sue Haddon

#5308

Name: Asuncion, Eric

Correspondence: I'm writing to support the public access and bicycling improvements outlined under Alternatives B, C, D, E, and F. I strongly support proposals that would lead to the planning and implementation of bicycling routes on trails, ranch roads, and pathways throughout the planning area, including but not limited to: 1) a connection between Devil's Gulch and Platform Bridge Road using existing ranch roads, 2) a connection between Bolinas Ridge Trail at Olema Hill and Point Reyes Station to serve as an interim connection for the Cross Marin Trail, 3) a connection between Bolinas Ridge Trail and Five Brooks Stables using existing ranch roads 4) a connection between Drakes Estero and Abbotts Lagoon Trail using existing ranch roads, 5) a connection between Marshall Beach Trailhead and Pierce Point Road using existing ranch roads, and 6) an Estero Trail loop using existing ranch roads. I encourage NPS to collaborate with ranchers and other stakeholders to educate the public and address concerns related to public access on working ranch lands.

The improvements outlined above would enable and encourage me to visit the Seashore more regularly-and by bike, rather than car. I would feel much safer riding in the Seashore and surrounding areas on trails, pathways, and ranch roads, rather than on roads shared with fast-moving vehicular traffic. Bicycling opportunities are currently very limited and fragmented, so any improvements in connectivity and the creation of new loop options would enable me to enjoy more of the Seashore and surrounding areas by bike.

#5309

Name: McCoy, Alisha

Correspondence: I believe that alternative D is the best choice for our National Seashore. The Tule Elk herds are a great national asset which cause less stress on the environment than do ranch animals such as cattle. The EIS shows the negative impacts cattle have. Point Reyes ecosystems should be protected and non-historic grazing lands should be reduced, not increased. Thank you.

#5310

Name: N/A, N/A

Correspondence: Get ranches off our public lands

#5311

Name: Caceres, Elena

Correspondence: I'm writing to support the public access and bicycling improvements outlined under Alternatives B, C, D, E, and F. I strongly support proposals that would lead to the planning and implementation of bicycling routes on trails, ranch roads, and pathways throughout the planning area, including but not limited to: 1) a connection between Devil's Gulch and Platform Bridge Road using existing ranch roads, 2) a connection between Bolinas Ridge Trail at Olema Hill and Point Reyes Station to serve as an interim connection for the Cross Marin Trail, 3) a connection between Bolinas Ridge Trail and Five Brooks Stables using existing ranch roads 4) a connection between Drakes Estero and Abbotts Lagoon Trail using existing ranch roads, 5) a connection between Marshall Beach Trailhead and Pierce Point Road using existing ranch roads, and 6) an Estero Trail loop using existing ranch roads. I encourage NPS to collaborate with ranchers and other stakeholders to educate the public and address concerns related to public access on working ranch lands.

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#5312

Name: Nicolas, Melvin

Correspondence: I'm writing to support the public access and bicycling improvements outlined under Alternatives B, C, D, E, and F. I strongly support proposals that would lead to the planning and implementation of bicycling routes on trails, ranch roads, and pathways throughout the planning area, including but not limited to: 1) a connection between Devil's Gulch and Platform Bridge Road using existing ranch roads, 2) a connection between Bolinas Ridge Trail at Olema Hill and Point Reyes Station to serve as an interim connection for the Cross Marin Trail, 3) a connection between Bolinas Ridge Trail and Five Brooks Stables using existing ranch roads 4) a connection between Drakes Estero and Abbotts Lagoon Trail using existing ranch roads, 5) a connection between Marshall Beach Trailhead and Pierce Point Road using existing ranch roads, and 6) an Estero Trail loop using existing ranch roads. I encourage NPS to collaborate with ranchers and other stakeholders to educate the public and address concerns related to public access on working ranch lands.

The improvements outlined above would enable and encourage me to visit the Seashore more regularly-and by bike, rather than car. I would feel much safer riding in the Seashore and surrounding areas on trails, pathways, and ranch roads, rather than on roads shared with fast-moving vehicular traffic. Bicycling opportunities are currently very limited and fragmented, so any improvements in connectivity and the creation of new loop options would enable me to enjoy more of the Seashore and surrounding areas by bike.

#5313

Name: Hustead, Lola

Correspondence: Please do not tell me that elk need to be less in their own environment and commercial farming needs to be more. How idiotic is this plan? There should be a limit on farm animals and the elk left alone on their own land. Commercial farming on Federal Park Land is not a good idea, to begin with. Who is paying the bribes on this expansion of damage caused by cows? This will end in a court fight and the elk will win because people

who love natural land will fight to keep it. Limit the farm animals and keep it wild for the elk and other forest critters.

#5314

Name: Cullen, Yvonne

Correspondence: Please adopt Alternative F to protect the park and allow people to use it as it should be used. Farming which would result in the culling of wildlife such as Elk is not appropriate in parkland which is there to preserve the environment and its wildlife for visitors, not to facilitate intensive farming.

#5315

Name: Schechs, Angelika

Correspondence: Please, save the Elk's.

#5316

Name: N/A, Natasha

Correspondence: The introduction of domestic animals other than cattle to Point Reyes National seashore as well as monoculture farming of crops such as artichoke will have major detrimental impacts to the ecosystems in the park.

As Point Reyes currently sits, it is one of the best places to see badgers, bobcats and coyotes in all of the western United States. The farming of small domestic animals such as goats, chickens and pigs will cause immediate conflict with the native carnivores, as the domestic animals will be predated and the ranchers will likely terminate the natives using depredation permits.

Monocultures of any variety will also be detrimental to the Point Reyes ecosystems, as monoculture crops tend to decrease biodiversity at all levels in the ecosystem. Any large scale use of pesticides will be detrimental to the endangered Red-legged frogs, and even organic fertilizers and pesticides can have negative impacts on amphibians.

It is in the best interest of the park and the general public to preserve Point Reyes in its present state, as there are very few places left in California where native wildlife still flourishes.

#5317

Name: Glazebrook, catriona

Correspondence: I am a long term resident of Marin County, have paid taxes here for over two decades and have Masters of Science in Resource Management & Administration and a Juris Doctorate. I oppose the continued use of the seashore for cattle ranching for environmental, social, and economic reasons.

As an outdoor enthusiast, and leader of nature hikes in Marin, many of the people who participate in my hikes, from all over the US and the world, come to California and Marin to enjoy and discover the natural beauty and enjoy the outdoors. Cattle ranching is Not a tourist attraction in the way that bird watching or enjoying pristine and protected coastlines are. I am impeded in enjoying the coastal lands due to those lands being used for the benefit of a few cattle ranchers. Participants that join me on my walks are unable to enjoy the protected coast that this area is meant to be. As the former executive director of the largest conservation organization in Texas I oversaw the The Great Texas Birding Classic in partnership with Texas Parks and Wildlife. This birding event, the largest in the country attracted many thousands of participants and raised money for conservation. Participants would identify as many different species of birds as possible. While the PRMS would be an ideal location for this type of activity - unfortunately it is tied up in cattle ranching.

The Birding Classic not only directly raised funds for conservation, but it drew in participants to travel throughout the region and generated revenue for local cities and towns and businesses all along the coastal corridor. The Birding Classic also had no negative impacts to the ecosystem.

This is only one potential way that local taxpayers and visitors could be enjoying our coast versus it being "closed" to cattle ranching. Birding would open the use and enjoyment of the area to many more people, and not impact the environment in the way that cattle grazing does.

#### ~~~~~Environmental Concerns

I managed one of the largest coastal sanctuaries in the United States stretching over 600 miles, & Sabal Palm Sanctuary, a 557-acre nature reserve. I developed habitat management plans and trail systems and directed species population surveys. I also advised private landowners and government agencies on species and habitat protection.

I am now the founder of Resilient Forests, developing and implementing habitat management plans for local and regional lands.

Cattle grazing is detrimental to native plant, bird and animal species and alters stream cover that can affect local fish populations. While I am sure you have many of the peer reviewed studies that prove these facts I turn attention to another pressing issue.

Habitat damage and loss today is far more serious given the increasing and rapid declines of national and local native species. A May 2019 report from the Intergovernmental Science-Policy Platform on Biodiversity and Ecosystem Services (IPBES) counted 1,000,000 species threatened with extinction, a record number in human history. California wildlife face the local manifestations of these global issues. A 2014 study by the National Audubon Society identified 314 species of birds as climate-threatened or climate-endangered. 170 of those birds commonly occur in California, including beloved species like the Barn Owl, the Western Bluebird and the Black-crowned Night Heron.

California deer populations have also fallen from a peak of about 2 million in the 1960s to around 500,000 in 2017. Increases in Wildlife Diseases: Epidemics among wildlife populations represent another major factor in California's declining biodiversity. Mange, a skin infection caused by parasitic mites, has become increasingly precarious for many furred animals like deer, bobcats, foxes and coyotes. Our local marin deer populations have been showing an alarming increase in mange over the past decade.

According to a study begun by the National Parks Service in 1996, notoedric mange killed more than 50% of radio-collared bobcats in the Santa Monica Mountains. Black-tailed deer face attacks from non-native lice like the exotic fallow deer louse and the African blue louse. Deer species are also dying increasingly from adenovirus hemorrhagic disease, and there are concerns that another fatal disease known as Chronic Wasting Disease (CWD). Bats are also dying from the fungus which is estimated to have killed more than six million in the United States. In July 2019, the California Department of Fish and Wildlife announced that the fungus is now present in California.

The die off and ill health of our California species is caused by a variety of factors including warming climates and unusual shifts in seasonal weather patterns.

What is especially alarming is the rapid rate of decline of many of these species. For example, the tri-colored blackbird - one of our states most prolific species - has nosedived with major population losses occurring in just the past 6 years! These types of rapid declines are unusual to say the least.

According to studies conducted by state and federal forest management agencies, more than 147 million trees have died, nearly a third of the states total forested land (33 million acres) in the last ten years.



Called the worst epidemic of tree mortality in modern history by former Governor Jerry Brown, this statewide tree die-off is already driving dramatic losses in biodiversity. While we have paid particular attention to trees and forests, based on habitat assessments coastal plant species are also declining.

These declines in native species populations are not likely to go away - but are in fact more likely to accelerate with global climate change.

Scientists have calculated the severity of the 2008-2010 California drought by combining the NOAAs estimates of the Palmer Drought Severity Index (PDSI), an index of soil moisture variability, with the existing North American Drought Atlas, a spatial tree-ring based reconstruction of droughts developed at Columbia Universitys Lamont-Doherty Earth Observatory.

These resources provided complementary data on rainfall and soil moisture over the past millennium. The scientists concluded that rainfall deficits, combined with record high temperatures, have brought about drought conditions not experienced for over 1,200 years.

Dry soil equals dry trees. An imaging spectrometer able to use sunlight to measure and determine the water content of trees was stationed on board the Carnegie Airborne Observatory to view over forest lands in California to help predict where the next major die-offs will occur. The spectrometer has been proven to be very accurate and indicated that a large percentage of the trees had low water reserves. It estimated that 66 million trees were too dry to survive, the following year, over 60 million trees did indeed perish. Drier soil conditions also impact coastal species.

Trees create local weather patterns through transpiration. With major tree die offs and fires occurring and likely to continue in California, transpiration led weather systems will change leading to further environmental problems.

The allowed die off of 250 tule elk inside the fenced Pierce Point Elk Preserve at Californias Point Reyes National Seashore from 2012 to 2014, due to lack of access to year-round water also reflects not just troubling weather patterns that will increase - but reflect an abnormally industry driven approach to managing lands held for the enjoyment of the public and protection of the environment. While Tule Elk may have been blamed for the extreme conditions, these conditions had nothing to do with the Tule Elk - and will likely return. As long as we continue to manage land oblivious to the rapid climate changes occurring - we will face more problems trying to do business as usual.

Cattle grazing is a water heavy industry that will no doubt require more subsidies to continue as weather changes continue.

In addition to greenhouse gases, cloud induced heat has been proven to be a major factor in the warming of the Earth. Scientists from the University of Bristol have indicated that Greenland Ice sheet is melting six times faster than it was during the 1980s. The increased melt is due to increased occurrence of clouds that act like a blanket causing strongest warming at the surface.

While most climate models evaluate the impact of greenhouse gases the study proves that clouds alone could equate to 40,000 gigatons of extra ice melt by the end of the 21st century. This is equivalent to 1,500 years of domestic water supply of the USA and 5 inches of global sea level rise. The warmer temperatures would also eliminate moisture held in soils making it more difficult for native plant species to survive.

Cattle are also a direct source of a methane, a greenhouse gas that is ten times more damaging than carbon dioxide. 5,000 cattle release 600,000 KG of methane annually.

Additionally, UV-B radiation from the sun is presently harming tree and forest health (Environmental Canada 1997). NASA scientists analyzing 30 years of satellite data have found that the amount of ultraviolet (UV) radiation reaching Earth's surface has increased markedly over the last three decades.

Although CFCs have not recently increased in the upper stratosphere it takes decades to cleanse CFCs and other ozone-depleting substances from the atmosphere. CFCs have a life-span of 50-100 years and will be present until at least 2070-2090. In addition, significant increases of aerosols and particulate matter in the lower and upper stratosphere increase UVB radiance back to the surface of the planet. UV-B, damages the DNA, proteins, lipids and membranes of humans, animals and plants. Studies suggest that increases in UV-B radiation hitting the earth's surface affects tree and forest health.

Plants, which use sunlight for photosynthesis and are unable to avoid exposure to enhanced levels of UV-B radiation, are especially at risk. UV-B inhibits the photosynthesis and that exposure to increased UV-B can sterilize trees.

The lower and upper atmosphere has been anthropogenically changed via a variety of causes, the combination of which is affecting the ability of native species accustomed to specific temperature, solar radiation and seasonal variations to survive. The global species extinction rates is proof that the Earth's biosphere has become less hospitable to support the variety of species that we and past generations have enjoyed in California.

As the recent disaster in the Bahamas, leaving 70% of its land mass under water, shows we live in a dramatically climate changed world. We must not only act to restore our atmosphere to health but we must change the way we have historically done business and managed the environment and native species.

Our national, state and regional wildlife policies are seriously out dated and do not address the significant declines in species and the significant changes that are going to continue to wipe out many of our native species.

Most plans and practices compromise biodiversity and long term sustainability. Management plans that focus primarily on supporting uses that are damaging to the land are out of step with a climate changed world. In this case, where the stated goal of the Management plan is to preserve the natural environment, current ranching operations are occurring against the wording of the law and given the added stresses to native species most stop!

Micheli et al. (2010) have shown how keeping forests and other wildlands resilient to the effects of climate change improves the capacity of flora and fauna to adapt to current and future climate-related changes.

A key requirement of ecosystem resiliency is healthy soil. Soil, along with the billions of bacteria, fungi, and other microbes that live within it, carries out a variety of important ecological roles: it provides and cycles nutrients, absorbs and holds rainwater, filters pollutants, and offers physical support for plant roots.

Cattle ranching leads to a decrease in bio-diversity and is damaging to the land. Domestic cattle that are fed specific non-wild - non native foods do not supply the soil with the range of microbes that a wild animal like a Tule Elk provides and their hoofs damage native plants.

We must act now to heighten our attention on preserving the Point Reyes National Seashore managed under the Point Reyes Act for maximum protection, restoration, and preservation of the natural environment.. Preservation of natural habitats like the PRNS is crucial to play a role in the survival of species threatened with extinction. If we can protect and restore these lands, and species like Tule Elk that belong there - we take a step in the right direction of stemming the tide of extinction and protecting native species for future generations to enjoy.

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Stop Economic Welfare for Cattle Ranching

As a local tax payer, I am incensed at the tax give aways provided to a few cattle ranchers at the Seashore. Without the economic subsidies provided by the state to benefit a few their ranching operations would not be sustainable. Ranches get subsidized grazing fees and housing, and enjoy taxpayer-funded infrastructure and other taxpayer funded projects.

Since when - are thousands of people and the government required to support an unsustainable industry on land that is supposed to be set aside and protected as a natural area? Government and tax payer subsidies and welfare for unsustainable and polluting industries is the reason why we are facing the terrible and globally reaching environmental problems, like climate change, we now face.

There are many environmental and health related problems with raising cattle for meat and milk. As we, and people of the world, face the tremendous changes occurring we must change our agricultural practices to be in greater alignment with restoring balance to our natural ecosystems. Providing government subsidies and tax dollars that I and other citizens pay to prop up unsustainable and ecologically damaging industries like cattle, and oil must end.

#5318

Name: LLoyd, Cynthia

Correspondence: I DO NOT AGREE WITH HE NPS'S CHOICE OF ALTERNATIVE B.

I do not support diversification activities that would allow the Seashore to authorize non-beef and dairy ranching agricultural practices in the future based on market conditions. The environmental impact of diversification has not been fully explored as required.

I do not support the leases moving beyond the the original ranch families

I do not support the culling of the Tule Elk

I do not support increase visitors traffic in designated wilderness areas such as Drake's Estero

#5319

Name: Palladini, Jennifer

Correspondence: Hello.

I am writing in response to the alternative management plans for elk and cattle. I am strongly against any plan that includes more long-term leases for cattle ranching or other agricultural activities on our public National Seashore. The cattle there have intense adverse effects on not just elk, but the vegetation communities and dependent insect and bird communities, water quality, and visitor access to our public lands.

I am in favor of plan F, which calls for a phasing out of cattle ranching and increasing visitor services and access to these regions of the Seashore. I frequent PRNS with my husband and two children ages 9 and 11. We've been coming regularly since they were infants. They know this park as well as anyone. We've hiked, backpacked, and kayaked many times.

I am consistently dismayed that so much of this property is off limits to the public, and for a purpose that is clearly incompatible with the National Park Service mission to "conserve the scenery and the natural and historic objects and the wild life 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."

The idea that we have to protect cattle ranches in California as historic is preposterous. First of all, these aren't historic - they are of industrial scale. Second, we need not look far to find cattle ranches doing just fine outside the

park boundary and all across the state. I understand that ranchers in the park pay no property taxes, pay below-market rents and pay discounted grazing fees, while the NPS pays for improvements to roads and buildings. Why should we continue to subsidize these ranchers at great expense, environmental destruction, and at the loss of enhanced visitor access to these regions?

Finally, I was discouraged to sense bias in the language of the proposals themselves. Why would there be no mention of increase in visitation levels and economic activities associated with enhanced visitor access under Plan F? We would come more often if there was someplace to stay overnight. Hotels and guest houses are expensive, the only local campground is often full during the high season and holidays, forcing us to drive there and back in one day. It seems as if the National Seashore has lost sight of its primary goals - conserving scenery, wildlife, and providing for the enjoyment of those resources for future generations."

I hope the Park Service will come to its senses and remember what its mission is, and what it is not.

#5320

Name: Loosli, Edward

Correspondence: As a former resident of the S.F. Bay area, I was a frequent visitor to Pt. Reyes National Seashore (PRNS). Like most tourists, I came to PRNS to see the wonders of its natural areas, which include the magnificent tule elk. I did not come to see cattle, which are ubiquitous throughout the western United States and which have destroyed almost 1/3 of PRNS from over-grazing and pollution. Where the privately owned cattle graze inside PRNS, the former coastal prairie has been severely degraded and unfortunately under the Park Service "preferred alternative", this natural resource degradation will continue indefinitely and actually worsen. I now live in Oregon and still visit PRNS to see the tule elk whenever I am in Northern California.

I support Alternative F and reject all the other alternatives. It is with this personal knowledge and including an understanding of the founding of PRNS, that Alternative F is the only possible alternative to bring PRNS into compliance with the mission of the National Park Service and the founding documents of PRNS.

These comments and my personal history at PRNS also establish that I have "standing" in case it is necessary to engage the court system in bringing about the proper management of PRNS.

Within Alternative F, I question the possible use of "prescribed grazing" by private livestock, as cattle have shown to be a destroyer of the natural environment at PRNS, not an enhancer of the environment, which is why Alternative F in my preferred alternative.

The mission of the National Park Service is to protect and conserve the natural resources of each designated area. The EIS clearly shows that every alternative except Alternative F will not allow for the adequate protection and conservation of PRNS's natural resources. So, I question how it is possible that a different alternative was picked, which clearly exacerbates the current unacceptable land uses by private livestock which also clearly are harming the natural resources of PRNS, as shown by the EIS.

Regarding the "historic ranches" at PRNS, let me submit that the true historic grazers of this land are tule elk who's ancestors have grazed this land for thousands of years. In contrast, human's have only been grazing and defouling this land for a couple hundred years - hardly fitting the term "historic". That said, The "historic" designation applies to the ranch buildings, not the former coastal prairie habitat that has been severely impaired by cattle grazing.

I question the very idea of expanding private agricultural uses at PRNS. As it has been stated in the EIS, this will make matters even worse for the natural environment, not better and will violate the mission of both the Park Service and PRNS.

The private cattle businesses were bought out by the National Park Service in the 1960s and 1970s for millions of dollars. The cattlemen were given the option of staying on their former ranches for 25 years or for the life of the former ranch owner. Both these options have long expired and it is high time for PRNS to be restored to its former glory, complete with uninhibited free-roaming tule elk, which is why you must support Alternative F (without prescribed cattle grazing).

#5321

Name: Shetty, Akash

Correspondence: I often ride bikes around Marin county but I'm currently uncomfortable riding around Pt. Reyes area.

I'm writing to support the public access and bicycling improvements outlined under Alternatives B, C, D, E, and F. I strongly support proposals that would lead to the planning and implementation of bicycling routes on trails, ranch roads, and pathways throughout the planning area, including but not limited to: 1) a connection between Devil's Gulch and Platform Bridge Road using existing ranch roads, 2) a connection between Bolinas Ridge Trail at Olema Hill and Point Reyes Station to serve as an interim connection for the Cross Marin Trail, 3) a connection between Bolinas Ridge Trail and Five Brooks Stables using existing ranch roads 4) a connection between Drakes Estero and Abbotts Lagoon Trail using existing ranch roads, 5) a connection between Marshall Beach Trailhead and Pierce Point Road using existing ranch roads, and 6) an Estero Trail loop using existing ranch roads. I encourage NPS to collaborate with ranchers and other stakeholders to educate the public and address concerns related to public access on working ranch lands.

The improvements outlined above would enable and encourage me to visit the Seashore more regularly-and by bike, rather than car. I would feel much safer riding in the Seashore and surrounding areas on trails, pathways, and ranch roads, rather than on roads shared with fast-moving vehicular traffic. Bicycling opportunities are currently very limited and fragmented, so any improvements in connectivity and the creation of new loop options would enable me to enjoy more of the Seashore and surrounding areas by bike.

#5322

Name: Weiner, Ben

Correspondence: Writing to support alternatives B, C, D, E, and F and would love to be able to bike throughout the park, especially: 1) a connection between Devil's Gulch and Platform Bridge Road using existing ranch roads, 2) a connection between Bolinas Ridge Trail at Olema Hill and Point Reyes Station to serve as an interim connection for the Cross Marin Trail, 3) a connection between Bolinas Ridge Trail and Five Brooks Stables using existing ranch roads 4) a connection between Drakes Estero and Abbotts Lagoon Trail using existing ranch roads, 5) a connection between Marshall Beach Trailhead and Pierce Point Road using existing ranch roads, and 6) an Estero Trail loop using existing ranch roads.

I really appreciate your work to make this happen so I can spend more time enjoying more of Pt Reyes. I bike on the roads now, but would visit much more often if trails and gravel roads were opened within it that I could ride. This would be incredible and make Pt Reyes even more of a treasure for me. Love Pt Reyes so much.

#5323

Name: Schiffman, Sheila

Correspondence: Regarding lethally removing the tule elk herds at Point Reyes National Seashore and replace them with grazing herds, I would like to register my absolute rejection to this ridiculous "management" plan. Maybe have the ranchers reduce their cattle herds? One is there naturally, the other is not.

#5324

Name: Hall, Brad

Correspondence: I love riding in the Pt Reyes area, but I rarely if ever go to the national seashore because it is super difficult to access by bike. I really support the improvements in public and bicycle access outlined under Alternatives B, C, D, E, and F, because it would bring me to the seashore more and expand on the of the nations best areas of biking even more! I ride in that area all the time, but never go to the seashore because of the lack of bike infrastructure. Please open it up!!!!

#5325

Name: N/A, Kasey

Correspondence: This allocation of land back to for profit ranchers is absurd for the NPS to ponder as an option. Livestock has adverse effects from an ecological standpoint on everything from plant species to the tule elk population that call the Point Reyes seashore home. We have pushed nature out of it's land for long enough, we do not need to continue human encroachment. Have these ranchers ever thought of the idea of becoming elk herders/ breeders as compared to cattle farmers? Let a local species thrive while still harvesting meat. Educate those that are unaware of what cattle grazing can do. Find alternative solutions between two opposing sides that benefit both. It is not hard, just takes more work.

#5326

Name: Barca, Erin

Correspondence: I am writing in support of free-roaming tule wapiti herds at Point Reyes National Seashore, and I object to any fencing, removal/relocation, sterilization or killing of wapiti in the park. Commercial lease holders on our public lands shouldn't dictate wildlife removal or exclusion policies. While in operation, any cattle ranching must be managed to accommodate wapiti and other native fauna (and flora!), and shouldn't harm habitat for endangered species. It is ever more egregious that this is being allowed in a National Park. The -only- National Park where tule wapiti can be found.

I further oppose "diversification" that would allow ranchers to grow crops or introduce new livestock animals into the park such as chickens, goats and sheep. This would be disastrous for the park's wildlife as it will create new conflicts by attracting more native species to crops and livestock. It would likely lead to the killing of the park's bobcats, foxes, coyotes and birds, etc. The potential for an increase in the usage of pesticide is another concern, as there is growing evidence of its role in invertebrate, amphibian and songbird declines. Ranching has already done unacceptable damage to the region's ecology. What I have personally witnessed over the years absolutely disgusts me.

Instead I urge you to adopt Alternative F. This option would phase out ranching entirely within the park, with the exception of two locations with life-estates that will eventually retire. And it would not remove or kill any tule wapiti, allowing them to naturally expand and no longer be treated like livestock.

The important thing is to restore native flora and the watershed from the overgrazing, trampling and pollution wrought by cattle ranching. It is important to remove competition with native wildlife such as tule wapiti who actually belong in the park. Commercial industries do not belong here. The Park Service should also move as quickly as possible to finalize a method for restoring grazing leases to wildlife habitat and public access when the final ranching families retire.

It has long been a dream of mine to see Point Reyes, a biodiversity hotspot, in its true, unrepressed colors. In the form of thriving native plants no longer trampled and consumed by livestock nor outcompeted by the invasives that gain ground in their hoof steps. No more denuded hills and fields. This alone would herald in a great pulse of invertebrate and vertebrate life. What a beautiful, lovely, scented dream. Finally free of the saturating stench of cow flop and piss. No one in their right mind seeks wilder reaches to smell that. It does not belong. It should not be here.

The decision to follow our nation's laws and protect wildlife, native plants, and the ecosystems they collectively represent, unimpaired, within our National Parks is important not only to the people of California, but to the entire United States. At stake is the integrity of ALL of America's National Parks.

The Park Service should prioritize protecting the natural values of Point Reyes National Seashore. Please, follow the rule of law and give tule wapiti and other native species precedence over commercial interests currently impoverishing our federally protected lands. Stop allowing private interests to abuse it. It has been a privilege for ranchers to remain in our National Seashore, NOT a right. With these most recent pushes to kill and even eradicate tule wapiti and expand their incompatible business with even more livestock and more crops, makes it crystal clear that they have stayed well past their welcome. There are a mere 5,700 tule wapiti left spread thin across the entire state in 22 herds. There are 5,250,000 cattle. Fair market value was paid for these ranches in the 1960s and 1970s. It is high time that we allow a battered Point Reyes National Seashore to recover and return to natural conditions. Point Reyes is one of America's most special places and is too important to sacrifice to power politics and special interests.

Please honor and protect Point Reyes National Seashore. We and future generations will thank you for your upholding the National Park System.

#5327

Name: Evens, Jules

Correspondence: Response to the Point Reyes National Seashore General Management Plan Amendment To: GMP Amendment % Superintendent From: Jules Evens, Citizen Date: September 12, 2019

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), 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 The Plan offer protection of natural resources or effective opportunities to manage the Park lands to promote ecological health. All but one of alternatives favor ranching interests over preservation of natural resources and ecological diversity. In its present iteration, this GMPA presents Hobson's choice to the public that provides no guidance toward protection and preservation of natural resources.

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.

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 Drakes 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 Parks 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 Parks 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 Parks auspices, they tend to 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 the adverse consequences of current ranching practices on plover reproductive success is 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.)

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 kowtow to political pressure and sacrifice ecological diversity to private agricultural interests on public lands.

The GMPA should strive to strengthen the intent of the Parks 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 Parks 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 Parks 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 Hobsons choice preferred by this citizen.

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 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.

Respectfully submitted-with concern, disappointment, and outrage-in honor those fought to protect this Island in Time. Jules Evens 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

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#5328

Name: Etter, John

Correspondence: Regarding the Elk herds in Point Reyes National Seashore, please adopt Alternative F. Our

family visits Point Reyes every year and enjoy watching and photographing the Elk, which we don't have where we live. We rather see the Elk herds and have the open space of Point Reyes than increased farming and grazing. Thank you!

John Etter

#5329

Name: N/A, N/A

Correspondence: Please adopt Alternative F, which would discontinue farming and ranching opportunities in the park and expand visitor opportunities.

#5330

Name: N/A, Brian

Correspondence: Aloha!

I'm writing to support the public access and bicycling improvements outlined under Alternatives B, C, D, E, and F!

I strongly support proposals that would lead to the planning and implementation of bicycling routes on trails, ranch roads, and pathways throughout the planning area, including but not limited to:

1) a connection between Devil's Gulch and Platform Bridge Road using existing ranch roads, 2) a connection between Bolinas Ridge Trail at Olema Hill and Point Reyes Station to serve as an interim connection for the Cross Marin Trail, 3) a connection between Bolinas Ridge Trail and Five Brooks Stables using existing ranch roads 4) a connection between Drakes Estero and Abbotts Lagoon Trail using existing ranch roads, 5) a connection between Marshall Beach Trailhead and Pierce Point Road using existing ranch roads, and 6) an Estero Trail loop using existing ranch roads. I encourage NPS to collaborate with ranchers and other stakeholders to educate the public and address concerns related to public access on working ranch lands.

The improvements outlined above would enable and encourage me to visit the Seashore more regularly-and by bike, rather than car.

I would feel much safer riding in the Seashore and surrounding areas on trails, pathways, and ranch roads, rather than on roads shared with fast-moving vehicular traffic. Bicycling opportunities are currently very limited and fragmented, so any improvements in connectivity and the creation of new loop options would enable me to enjoy more of the Seashore and surrounding areas by bike.

Thank you! Brian

#5331

Name: Fuchs, Elizabeth

Correspondence: Please adopt Alternative F to stop cattle ranching in the park and protect native species and elk.

#5332

Name: Mattison, Catherine

Correspondence: We need a new vision for the Seashore: No ranching. (Alternative F) - Phase out the ranches. - Disallow all commercial livestock in the park. - Prioritize wildlife over domestic cattle. - Biodiversity should not be sacrificed to private ranching.

• Point Reyes National Seashore is supposed to be managed under the Point Reyes Act for "maximum protection, restoration, and preservation of the natural environment." There's no mandate for prioritizing commercial agricultural leases on these public lands. • Natural values, native wildlife, public access and enjoyment should take priority over commercial activities at Point Reyes. • Tule elk are an important part of the landscape at Point Reyes. Their recovery is a result of successful native ecosystem restoration, which is a key element of the Park Service's mission. It's taken a lot of time, money and effort to restore tule elk to Point Reyes, the only national park where they live. Tule elk should be allowed to roam free and forage in the park - not shot, removed, fenced or treated as problem animals. • Right now the Point Reyes ranches enjoy not only subsidized grazing fees and housing, but also taxpayer-funded infrastructure and road improvements, and publicly funded projects. But commercial activities at Point Reyes should be required to accommodate native wildlife - not the other way around. • The Park Service shouldn't allow any new agricultural activities at Point Reyes. Planting artichokes or other row crops will attract birds. And introducing sheep, goats, pigs or chickens will attract native predators such as coyotes, bobcats and foxes. Expanded ranching would only create new wildlife conflicts.

#5333

Name: Weaver, Eric

Correspondence: I am writing to object to cattle ranching at the Point Reyes seashore. I ride my bike in the area and the stench of cattle manure is overwhelming. Even to a non-scientist it is apparent that the streams are polluted with runoff. Public lands should be dedicated to the public and not to a few private ranchers.

#5334

Name: Farnkopf, John

Correspondence: My parents were instrumental in the formation of Point Reyes National Seashore. I have been a lifelong visitor to the Park. It's a very special place. Oysters have been removed from the Estuary. The cows can be ranched somewhere else. I strongly endorse Alternative F.

#5335

Name: DURBIN, KIRA

Correspondence: adopt Alternative F, which would discontinue farming and ranching opportunities in the park and expand visitor opportunities. the preservation of native wild species must take precedence over farming and ranching activities. grazing negatively affects ecosystems, causing water pollution and soil erosion, spreading invasive species and disease, and harming endangered species.

#5336

Name: Swope, Robin

Correspondence: I am writing to urge NPS to adopt Alternative F, which would discontinue farming and ranching opportunities in the Point Reyes National Seashore and expand visitor opportunities. Our national parks belong to all Americans - not just those who pay to use the land and profit from it. Preservation of native wild species must take precedence over farming and ranching activities. As you know, grazing negatively affects ecosystems, causing water pollution and soil erosion, spreading invasive species and disease, and harming endangered species. As the climate crisis continues to worsen we have an obligation to do all we can to stop the destruction and reverse as much as possible. Numerous studies have shown how bad cattle are for the environment, Please do the right things and adopt Alternative F. Thank you.

#5337

Name: Andreas, Leticia

Correspondence: As someone who has enjoyed the tile elk in the past, I am hugely disappointed that the CA ranchers would act like TX ranchers, and kill wildlife at all costs. Are you truly so needy and greedy? We live in a

state that should not support actions like these as the cattle industry is a main polluter, and nobody needs that much meat in a society where we have meat spoiling in the stores. Maybe the ranchers should consider changing their job or lifestyle!

Thank you, Leticia Andreas

#5338

Name: Malaspina, James

Correspondence: I'm writing to support the public access and bicycling improvements outlined under Alternatives B, C, D, E, and F. I strongly support proposals that would lead to the planning and implementation of bicycling routes on trails, ranch roads, and pathways throughout the planning area, including but not limited to: 1) a connection between Devil's Gulch and Platform Bridge Road using existing ranch roads, 2) a connection between Bolinas Ridge Trail at Olema Hill and Point Reyes Station to serve as an interim connection for the Cross Marin Trail, 3) a connection between Bolinas Ridge Trail and Five Brooks Stables using existing ranch roads 4) a connection between Drakes Estero and Abbotts Lagoon Trail using existing ranch roads, 5) a connection between Marshall Beach Trailhead and Pierce Point Road using existing ranch roads, and 6) an Estero Trail loop using existing ranch roads. I encourage NPS to collaborate with ranchers and other stakeholders to educate the public and address concerns related to public access on working ranch lands.

The improvements outlined above would enable and encourage me to visit the Seashore more regularly-and by bike, rather than car. I would feel much safer riding in the Seashore and surrounding areas on trails, pathways, and ranch roads, rather than on roads shared with fast-moving vehicular traffic. Bicycling opportunities are currently very limited and fragmented, so any improvements in connectivity and the creation of new loop options would enable me to enjoy more of the Seashore and surrounding areas by bike.

This is a critical need given the continued challenges we have to keep our environment and residents healthy and sane.

#5339

Name: Schwerin, Rich

Correspondence: I'm writing to support the public access and bicycling improvements outlined under Alternatives B, C, D, E, and F.

I strongly support proposals that would lead to the planning and implementation of bicycling routes on trails, ranch roads, and pathways throughout the planning area, including but not limited to: 1) a connection between Devil's Gulch and Platform Bridge Road using existing ranch roads, 2) a connection between Bolinas Ridge Trail at Olema Hill and Point Reyes Station to serve as an interim connection for the Cross Marin Trail, 3) a connection between Bolinas Ridge Trail and Five Brooks Stables using existing ranch roads 4) a connection between Drakes Estero and Abbotts Lagoon Trail using existing ranch roads, 5) a connection between Marshall Beach Trailhead and Pierce Point Road using existing ranch roads, and 6) an Estero Trail loop using existing ranch roads. I encourage NPS to collaborate with ranchers and other stakeholders to educate the public and address concerns related to public access on working ranch lands.

The improvements outlined above would enable and encourage me to visit the Seashore more regularly-and by bike, rather than car. I would feel much safer riding in the Seashore and surrounding areas on trails, pathways, and ranch roads, rather than on roads shared with fast-moving vehicular traffic.

Bicycling opportunities are currently very limited and fragmented, so any improvements in connectivity and the creation of new loop options would enable me to enjoy more of the Seashore and surrounding areas by bike.

Thank you for considering my input.

#5340

Name: Gregor, Alex

Correspondence: I'm writing to support the public access and bicycling improvements outlined under Alternatives B, C, D, E, and F. I strongly support proposals that would lead to the planning and implementation of bicycling routes on trails, ranch roads, and pathways throughout the planning area, including but not limited to: 1) a connection between Devil's Gulch and Platform Bridge Road using existing ranch roads, 2) a connection between Bolinas Ridge Trail at Olema Hill and Point Reyes Station to serve as an interim connection for the Cross Marin Trail, 3) a connection between Bolinas Ridge Trail and Five Brooks Stables using existing ranch roads 4) a connection between Drakes Estero and Abbotts Lagoon Trail using existing ranch roads, 5) a connection between Marshall Beach Trailhead and Pierce Point Road using existing ranch roads, and 6) an Estero Trail loop using existing ranch roads. I encourage NPS to collaborate with ranchers and other stakeholders to educate the public and address concerns related to public access on working ranch lands.

The improvements outlined above would enable and encourage me to visit the Seashore more regularly-and by bike, rather than car. I would feel much safer riding in the Seashore and surrounding areas on trails, pathways, and ranch roads, rather than on roads shared with fast-moving vehicular traffic. Bicycling opportunities are currently very limited and fragmented, so any improvements in connectivity and the creation of new loop options would enable me to enjoy more of the Seashore and surrounding areas by bike.

#5341

Name: Leaf, Sheryl

Correspondence: Please protect the native elk in Pt.Reyes National Seashore. The interest of cattle ranchers should NOT determine policy or land use.

#5342

Name: Johnston, Robert

Correspondence: Comments to the PRNS On the Draft EIS for the General Management Plan Amendment

Robert A. Johnston Sept. 18, 2019

I emphasize the actions I want you to take with **\*\*...\*\***, since this form does not allow underlining.

1. The DEIS is legally inadequate in that the impacts of the ranching alternatives are described as being reduced, when compared to existing conditions (Alternative A), but not in absolute terms when compared to legal standards. **\*\*In the Final EIS, please provide additional assessment of all significant adverse impacts in absolute terms and then compare these impact levels to all existing State and Federal standards.\*\*** The NPS is legally compelled to not "impair" the "natural resources" in the Seashore and so this analysis is required. The data are available for water quality and soil erosion, two major impact types.
2. The DEIS makes it clear that Alternative F is superior in terms of all natural resources impacts. If some of the abandoned farm buildings are used in future years for interpreting ranching history, then this alternative is also superior in terms of historic structures and districts. Ranching was only ever guaranteed for the original families and so the NPS does not have to allow these environmentally destructive land uses to continue. (The Secretary's order does not supersede the PRNS organic law.) **\*\*Please adopt Alternative F in the Final EIS and ROD.\*\***
3. The NEPA regulations make it clear that agencies must adopt mitigation measures and enforce them. The CEQ Guidelines (NEPA regulations) state that an EIS must include "appropriate mitigation measures" (40CFR1502.14(f)). The purpose of an EIS is to "avoid or minimize adverse impacts" (40CFR1502.1). An EIS must include a discussion of "means to mitigate adverse environmental impacts" (40CFR1502.16(h)). In the Record of

Decision (ROD), the agency shall adopt a “monitoring and enforcement program...for any mitigation.” (40CFR1505.2(c)).

The DEIS states that all mitigation measures are mandatory (p. D-1). In the discussion of the impacts on water resources, the DEIS says that ranching will cause “long-term adverse impacts” but the “use of mitigation would minimize and/or avoid these impacts” (p. 115). No means of guaranteeing that the mitigation measures listed in the DEIS take place are identified. Similarly, on pg. 117 the DEIS states that “ROAs would include... standards and mitigation measures. . .that would be required. . .to minimize impacts.” \*\*The FEIS and ROD must include binding commitments and funding to assure enforcement all of the ranch standards and mitigation measures in the Draft.\*\* The NMFS and F&WS biological assessments state that these sister agencies will require full enforcement of all existing rules on the ranches and also will provide “numerous added mitigation measures” after reviewing the DEIS. So, the NPS will have to commit to enforcing all mitigation measures and standards that affect fisheries and water quality. The NPS must likewise commit to the enforcement of all of the ranching standards and mitigation measures. The regional water quality board will likewise require the NPS to manage the ranches so as to meet all of their rules and standards. 4. The NPS has a very poor record of not managing range conditions very well in the Seashore. Their Residual Dry Matter (RDM) report is found at [https://www.nps.gov/pore/getinvolved/upload/planning\\_ranch\\_cmp\\_background\\_report\\_ucberkeley\\_residual\\_dry\\_matter\\_analysis\\_150830.pdf](https://www.nps.gov/pore/getinvolved/upload/planning_ranch_cmp_background_report_ucberkeley_residual_dry_matter_analysis_150830.pdf) This study shows that from 1987-2014 the RDM values fell below the desired levels and blame this on the drought. In ranching it is generally taken as a given that in dry years you reduce your herds so as to not denude the land of grasses, thereby causing soil erosion and the spread of invasive plants. The Park seems to not follow this basic policy. Table 3.1 shows a Park-wide average RDM below the "target" of 1,200 lbs/ac. for two years, meaning that at least several ranches, and perhaps most, were below the target level. Table 3.4 shows these Park-wide average RDMs also below the target for 2008 and 2009.

The report goes on to describe the 15 transects where the RDM was below the target for two or three other years. One bad year (low RDM) is typically allowed by the Park, but not two or more, as reducing herd size on the problem fields immediately should fix the problem in the next year. These study transects represent about 15 fields where herd management was not sufficient to restore the grasses in one year. The Park's Range Management Guidelines of 1990 need to be updated, according to the authors in this 2015 report. The authors recommend that the Park adopt more-detailed ranch monitoring rules and that the Fall RDM values be used to determine herd size for the following year. This statement implies that the Park has not done this in the past, which is egregious. Rangelands in this Park look very bad on many ranches in the Summer and Fall.

The accompanying tables and graphs in the report show most ranches out of compliance in 1987 and 1988, but many ranches are also out of compliance in some of the following years, in most cases for two years or more in a row, indicating that herds were not reduced in time to protect the fields from erosion. This report clearly shows that the Park has not managed the ranches sufficiently in order to protect the public's lands from soil erosion. \*\*So, the FEIS and ROD must include strong NPS commitments to the enforcement of ranch standards and mitigation measures.\*\* 4. A more-difficult issue is how to modify the ranch standards and mitigation measures in the future as experience dictates, due to inadequate results on the ground. \*\*The FEIS and ROD must include a binding policy governing all ranch lands stating that adaptive management will be employed by the NPS and ranch standards will be modified, as needed, to minimize or avoid adverse impacts.\*\* Perhaps the funding for this additional monitoring and regulation can be obtained by requiring the ranches to fund this work.

Thanks for considering my comments. Robert A. Johnston

#5343

Name: Rodgers, Darrell  
Correspondence: Hello,

I'm a resident of Marin County and am in favor of expanded bicycle use in the Point Reyes National Seashore area. Currently there are few options for cyclists and many of the current options are overcrowded with vehicle

traffic and unsafe. Not only do myself and my family enjoy hiking off pavement roads we also enjoy riding our bikes in these places that expose us to the nature we value so much.

After researching what NPS has in consideration these are the plan elements we support:

- . A connection between Devil's Gulch and Platform Bridge Road using existing ranch roads.
- . A connection between Bolinas Ridge Trail at Olema Hill and Point Reyes Station to serve as an interim connection for the Cross Marin Trail.
- . A connection between Bolinas Ridge Trail and Five Brooks Stables using existing ranch roads.
- . A connection between Drakes Estero and Abbotts Lagoon Trail using existing ranch roads.
- . A connection between Marshall Beach Trailhead and Pierce Point Road using existing ranch roads.
- . An Estero Trail loop using existing ranch roads.
- Collaboration with ranchers and other stakeholders to educate the public and address concerns related to public access on working ranch lands.

Thank you for your time and considerations of shared use!

Darrell Rodgers

#5344

Name: Becker , Johnathan

Correspondence: Improve access for bikes in non-wilderness areas.

#5345

Name: Laurent, Bo

Correspondence: I have bicycled a few times on Point Reyes National Seashore, and I loved it! It's a beautiful place to ride.

However, what I didn't like was riding on roads with lots of car traffic and no bike lanes.

I support the public access and bicycling improvements outlined under Alternatives B, C, D, E, and F.

I strongly support proposals that would lead to the planning and implementation of bicycling routes on trails, ranch roads, and pathways throughout the planning area, including but not limited to: 1) a connection between Devil's Gulch and Platform Bridge Road using existing ranch roads, 2) a connection between Bolinas Ridge Trail at Olema Hill and Point Reyes Station to serve as an interim connection for the Cross Marin Trail, 3) a connection between Bolinas Ridge Trail and Five Brooks Stables using existing ranch roads 4) a connection between Drakes Estero and Abbotts Lagoon Trail using existing ranch roads, 5) a connection between Marshall Beach Trailhead and Pierce Point Road using existing ranch roads, and 6) an Estero Trail loop using existing ranch roads. I encourage NPS to collaborate with ranchers and other stakeholders to educate the public and address concerns related to public access on working ranch lands.

The improvements outlined above would enable and encourage me to visit the Seashore more regularly-and by bike, rather than car. I would feel much safer riding in the Seashore and surrounding areas on trails, pathways, and



ranch roads, rather than on roads shared with fast-moving vehicular traffic. Bicycling opportunities are currently very limited and fragmented, so any improvements in connectivity and the creation of new loop options would enable me to enjoy more of the Seashore and surrounding areas by bike.

#5346

Name: FOXX, N/A

Correspondence: I strongly oppose the National Park Service's plan to kill tule elk, a NATIVE species, in order to expand commercial agriculture for NON-NATIVE species, in Point Reyes National Seashore and Golden Gate National Recreation Area. The National Park Service is supposed to restore the lands for wild animal habitat, not cater to special interests. The preservation of our public lands and wildlife needs to be the PRIORITY, not the economic interests of private ranchers. National parks exist to protect our natural resources and native wildlife.

Cattle ranches have serious negative environmental impacts on the environment, including polluting waterways, causing soil erosion, and harming the many endangered and threatened animals who live on Point Reyes.

Please, get your priorities straight.

#5347

Name: Wauschek, Michael

Correspondence: We need to leave the elk alone let them be they were their first before any of those ranchers were even born. Yes you may gain \$ for letting allow cattle on our parks. It is time change we need our elk back. Everytime I go by that park I think of the elk not cattle.

#5348

Name: Muldoon, Matthew

Correspondence: Hi. I expect you're aware that Marin County Bicycle Coalition is encouraging the cycling community to write you guys about expanding access for bike at Point Reyes National Seashore.

I'll skip the talking points- hopefully you've seen them many times by now- and simply say that I fully support every one of their suggestions for expanded access.

All their proposals are on existing pathways/trails/roads on leased ranch land. Compared to the impact of cattle on land, the impact of bikes would be insignificant.

Current access is limited but what there is is stunning. Greater bicycle access would permit more people to enjoy this spectacular land and would offer safer alternatives to those of us (like me) who regularly ride there.

Please give the MCBC's proposals your thoughtful consideration.

Sincerely,

Matt Muldoon

#5349

Name: Ferre, Corinne

Correspondence: Please protect Tule elk as they are a unique species.

Thanks, Corinne

#5350

Name: Michaels, Brenda

Correspondence: Point Reyes National Park is public and belongs to all of us, including its natural habitants! Elk should be allowed to graze there. Farmers and ranchers using it, for grazing their cattle (which shouldn't be allowed in the first place), must allow Elk to graze. To kill these animals because of cattle grazing would be WRONG!

Please re-consider and allow Elk to graze on in their natural habitat!

#5351

Name: Freschet, Lorenzo

Correspondence: I'm writing to support the public access and bicycling improvements outlined under Alternatives B, C, D, E, and F. I strongly support proposals that would lead to the planning and implementation of bicycling routes on trails, ranch roads, and pathways throughout the planning area, including but not limited to: 1) a connection between Devil's Gulch and Platform Bridge Road using existing ranch roads, 2) a connection between Bolinas Ridge Trail at Olema Hill and Point Reyes Station to serve as an interim connection for the Cross Marin Trail, 3) a connection between Bolinas Ridge Trail and Five Brooks Stables using existing ranch roads 4) a connection between Drakes Estero and Abbotts Lagoon Trail using existing ranch roads, 5) a connection between Marshall Beach Trailhead and Pierce Point Road using existing ranch roads, and 6) an Estero Trail loop using existing ranch roads. I encourage NPS to collaborate with ranchers and other stakeholders to educate the public and address concerns related to public access on working ranch lands.

The improvements outlined above would enable and encourage me to visit the Seashore more regularly-and by bike, rather than car. I would feel much safer riding in the Seashore and surrounding areas on trails, pathways, and ranch roads, rather than on roads shared with fast-moving vehicular traffic. Bicycling opportunities are currently very limited and fragmented, so any improvements in connectivity and the creation of new loop options would enable me to enjoy more of the Seashore and surrounding areas by bike.

#5352

Name: Thorpe, James

Correspondence: I'm writing to support the public access and bicycling improvements outlined under Alternatives B, C, D, E, and F!

I strongly support proposals that would lead to the planning and implementation of bicycling routes on trails, ranch roads, and pathways throughout the planning area, including but not limited to:

1) a connection between Devil's Gulch and Platform Bridge Road using existing ranch roads, 2) a connection between Bolinas Ridge Trail at Olema Hill and Point Reyes Station to serve as an interim connection for the Cross Marin Trail, 3) a connection between Bolinas Ridge Trail and Five Brooks Stables using existing ranch roads 4) a connection between Drakes Estero and Abbotts Lagoon Trail using existing ranch roads, 5) a connection between Marshall Beach Trailhead and Pierce Point Road using existing ranch roads, and 6) an Estero Trail loop using existing ranch roads. I encourage NPS to collaborate with ranchers and other stakeholders to educate the public and address concerns related to public access on working ranch lands.

The improvements outlined above would enable and encourage me to visit the Seashore more regularly-and by bike, rather than car.

I would feel much safer riding in the Seashore and surrounding areas on trails, pathways, and ranch roads, rather than on roads shared with fast-moving vehicular traffic. Bicycling opportunities are currently very limited and

fragmented, so any improvements in connectivity and the creation of new loop options would enable me to enjoy more of the Seashore and surrounding areas by bike.

Thank you!

#5353

Name: Pfeiffer, Mindy

Correspondence: To Whom It May Concern:

I am writing today to urge you not to shoot and kill any of the tule elk living in the Point Reyes area. These beautiful animals deserve the right to continue to live in their area, and by killing them you will be upsetting the balance of nature, not to mention the fact that many people, such as my husband and me, come to the area to see the elk and spend our tourist dollars.

I urge you not to put the interests of commercial agriculture above that of the wildlife, such as the tule elk that live in the area. We should prioritize the preservation of our public lands and wildlife, not the economic interests of private ranchers. These commercial cattle ranches have serious negative environmental impacts on the park - polluting waterways, causing soil erosion, and harming the many endangered and threatened animals who live on Point Reyes. National parks exist to protect our natural resources and native wildlife. This park should be managed accordingly.

Thank you, Mindy Pfeiffer

#5354

Name: Barton, Jennifer

Correspondence: Point Reyes National Seashore is supposed to be managed under the Point Reyes Act for "maximum protection, restoration, and preservation of the natural environment." There's no mandate for prioritizing commercial agricultural leases on these public lands. Even so, Point Reyes ranches enjoy not only subsidized grazing fees and housing, but also taxpayer-funded infrastructure and road improvements, and publicly funded projects. But commercial activities at Point Reyes should be required to accommodate native wildlife - not the other way around. Natural values, native wildlife, public access and enjoyment should take priority over commercial activities at Point Reyes.

The Park Service shouldn't allow any new agricultural activities at Point Reyes. Planting artichokes or other row crops will attract birds. Activities such as mowing shouldn't be allowed in park areas where they harm endangered species or wildlife habitat, impair water quality, cause excessive erosion or spread invasive plants/diseases. And introducing sheep, goats, pigs or chickens will attract native predators such as coyotes, bobcats and foxes. Expanded ranching would only create new wildlife conflicts. Cattle ranching should only be allowed if it's consistent with preserving the natural environment. Cattle are the seashore's primary source of greenhouse gases, so the Park Service's preferred alternative is inconsistent with its own "Climate Friendly Parks" plan.

Tule elk are an important part of the landscape at Point Reyes. Their recovery is a result of successful native ecosystem restoration, which is a key element of the Park Service's mission. It's taken a lot of time, money and effort to restore tule elk to Point Reyes, the only national park where they live. Tule elk should be allowed to roam free and forage in the park - not shot, removed, fenced or treated as problem animals.

#5355

Name: Silver, Dan

Correspondence: I support phasing out of ranching, or Alternative F. It is time to prioritize native wildlife.

Thank you

#5356

Name: Handel, Brad

Correspondence: As a long time visitor of the park, I support the decision to cease all farming activities on the National Seashore. They have a negative impact on the local animal species, plants, and ocean life. Their existence is not compliant with the original goals of the park service when they bought the land from the farmers and created the National Seashore.

Another author was able to write out my views in a much better way. Please see the below and do your best to look at the situation with the lens of what's in the best interest of the land and the many animals who call the seashore their home.

All ranching operations in the planning area would be discontinued, and visitor opportunities on these lands would expand. The NPS would take no action to limit population growth or geographic extent of free-ranging elk in Point Reyes. Following cessation of ranching, the elk fence at Tomales Point would be removed, allowing that herd to be free-ranging as well.

Ranching was not one of the intended purposes of the parks. In the enabling legislation, Congress established Point Reyes National Seashore in 1962 "to save and preserve, for the purposes of public recreation, benefit, and inspiration, a portion of the diminishing seashore of the United States that remains undeveloped." The purchase of the ranches clearly indicates that the intent was to remove the ranching operations in support of the enabling legislation.

The parks were not intended to support ranching in perpetuity. To grant ranchers new 20-year leases and allow "diversification" by permitting pigs, chickens, sheep, and goats; horse boarding; row crops; processing of dairy products; and public farm stays and tours would be huge steps backwards, and will further harm the natural environment of the parks over the long term. If the NPS' Preferred Alternative is adopted it's likely that ranching on these park lands will never end, the land will continue to be degraded, and the millions of dollars the American people paid for these lands (money that has been kept by the ranchers) will be for naught. It's time to phase out the ranches and manage the parks for the superlative natural beauty and diversity they offer.

#5357

Name: Pagnini, Jen

Correspondence: The economic interests of cattle ranchers should not be what the National Park Service is trying to protect. Point Reyes National Seashore and Golden Gate National Recreation Area are places that need to be preserved for wild animal habitat. Please do not extend the use of anymore of our national lands to commercial agriculture business owners.

#5358

Name: gerber, robin

Correspondence: Please protect Point Reyes and the Tule Elk population. This is a precious, magnificent natural area. Thank you.

#5359

Name: Gallucci, Mike

Correspondence: Please let us ride da bikes!

#5360

Name: Lukanuski, Mary

Correspondence: Hi, I'm an avid road and MTB cyclist. I would love to see safer alternatives to cycling on the roads, which can get very busy over the weekends AND more loop options so we cyclists can safely experience the extent of the Seashore. I would support the following loops: A connection between Devil's Gulch and Platform Bridge Road using existing ranch roads.

A connection between Bolinas Ridge Trail at Olema Hill and Point Reyes Station to serve as an interim connection for the Cross Marin Trail.

A connection between Bolinas Ridge Trail and Five Brooks Stables using existing ranch roads.

A connection between Drakes Estero and Abbotts Lagoon Trail using existing ranch roads.

A connection between Marshall Beach Trailhead and Pierce Point Road using existing ranch roads.

An Estero Trail loop using existing ranch roads.

I would love to see these developed so my family and I could experience the beauty of Point Reyes safely without a car!

Your attention is much appreciated.

Mary

#5361

Name: Butera, Joseph

Correspondence: Dear National Park Service:

My comments are concerning Point Reyes Seashore. This protected place should be for people not ranches and livestock.

Its time the Ranches/livestock LEAVE!!

Sincerely.

#5362

Name: Va, Stina

Correspondence: I support an elk management plan prioritizes the native heritage of of Point Reyes, which means a plan and policy that prioritizes Tule Elk and a policy that is truly committed to phasing out agriculture/dairy farms. Plenty of scientific evidence exists that dairy farms are not sustainable. In Point Reyes, that could not be more true. Since the introduction of livestock grazing, 14 wildlife species have become listed as endangered or threatened because of this. Sustaining the heritage of Point Reyes means protecting these native wild species.

#5363

Name: Vahlberg, John

Correspondence: I visited Pt Reyes last weekend by car for the first time, thinking it could be a cool place to ride. The answer was a resounding "no" because of the condition, width, and high-speed vehicle use of the roads I'd

have to ride on. I'm a team director for a high school mountain bike team, so I'm always looking for new places to go, and to bring the team to. I found myself thinking for much of the drive back from the lighthouse how amazing it would be to have bike trails (preferably dirt) that gave access to this amazing place, and that it was truly shameful that it was so car-centric in its accessibility when more than half my team doesn't have a drivers license yet.

I don't go places that are car-centric, I don't have time to waste driving around in a metal box (no matter how beautiful the place) when I can be outside and exercising. And it has to be safe enough to ride, or I just spend all my time on high alert for cars and I can't relax and enjoy the place at all (or I'm not comfortable with the risk in this case). Then I got an email notifying me of an ongoing plan and I thought "there's hope! maybe they'll actually do something to increase access to this place!"

So I'm writing to support the public access and bicycling improvements outlined under Alternatives B, C, D, E, and F. I strongly support proposals that would lead to the planning and implementation of bicycling routes on trails, ranch roads, and pathways throughout the planning area, including but not limited to: 1) a connection between Devil's Gulch and Platform Bridge Road using existing ranch roads, 2) a connection between Bolinas Ridge Trail at Olema Hill and Point Reyes Station to serve as an interim connection for the Cross Marin Trail, 3) a connection between Bolinas Ridge Trail and Five Brooks Stables using existing ranch roads 4) a connection between Drakes Estero and Abbotts Lagoon Trail using existing ranch roads, 5) a connection between Marshall Beach Trailhead and Pierce Point Road using existing ranch roads, and 6) an Estero Trail loop using existing ranch roads. I encourage NPS to collaborate with ranchers and other stakeholders to educate the public and address concerns related to public access on working ranch lands.

If these improvements were made, Pt Reyes would become a regular destination for me - it is such an amazing place! I would have a safe pathway to the seashore on trails and ranch roads, and be able to stay off the narrow main road with the fast moving cars full of people who are watching their phones and the scenery. Bicycling opportunities are currently so limited and fragmented at Pt Reyes that they are useless to me and everyone I ride with. We're not talking about little kids riding half a mile on a dirt path out and back - we look for loops that are 15 miles minimum, and up to 60 miles. We particularly love loops and connections, not out-and-backs. Any improvements in connectivity and the creation of new loop options would enable me to enjoy more of the Seashore and surrounding areas by bike.

#5364

Name: Mullen, Paula

Correspondence: I and most California residents care about protecting California's wildlife, especially in areas set aside specifically for wildlife and land preservation. I oppose the National Park Service's plan to kill native tule elk in Point Reyes National Seashore and Golden Gate National Recreation Area. I do not want wildlife killed to help the economic interests of private ranchers, whose ranches adversely affect the environment. This goes against what national parks are all about - protecting our wild spaces and the wildlife who live and truly belong there. These parks need to be managed responsibly, always adhering to the primary mission of preserving the land and wildlife.

Sincerely, Paula Mullen

#5365

Name: N/A, N/A

Correspondence: I'm a periodic visitor to Pt. Reyes. It's about time that the Park Service quit "apologizing" for ensuring that the land that it legally and fairly obtained decades ago does not remain semi-privatized. I was disgusted regarding the so-called controversy regarding oyster farming, for example.

Cows are not a natural part of the environment. They cause damage, interfere with wildlife, and inhibit public access. Such activities belong on private land. Even worse is the plan to kill some Tule Elk, to accommodate cows/private uses of public land.

#5366

Name: Va, Stina

Correspondence: As a member of the California-based international animal protection nonprofit organization In Defense of Animals with over 250,000 supporters, I oppose the National Park Service plan to kill native Tule elk, grow commercial crops, and permit ranchers to add chickens, turkeys, sheep, pigs, and goats to their exploitative operations.

As national park land, this property was specifically set aside to protect, restore, and preserve the natural environment including the wild animals who live there. The original intention was to phase out dairy and cattle ranching, not add more crops or animals to increase ranching profits.

The proposed plan does not address the damage from grazing, including water-quality degradation and soil erosion. Also, adding new crops will create more conflicts with native wild animals.

Please abandon this inhumane and destructive plan. I urge you to restore the Seashore's Pastoral Zone for wild animal habitat and repurpose historic ranch buildings for scientific research, interpretation, and public education.

#5367

Name: Couch, Sandra

Correspondence: Adopt Alternative F, which would discontinue farming and ranching opportunities in the park and expand visitor opportunities. Tell the NPS that the preservation of native wild species must take precedence over farming and ranching activities. Remind it that grazing negatively affects ecosystems, causing water pollution and soil erosion, spreading invasive species and disease, and harming endangered species.

#5368

Name: Diaz, Henry

Correspondence: I am writing in support of safer riding and expanded access at Pt Reyes National Seashore. I ride in this area and west Marin at least twice each a month during the 'dry' season. I also encounter visitors from around the country who wish to see this magnificent area. All would be benefited from these improvements, both riders on/off road and those in vehicles if we had safer access for cyclists. I cherish this great park and would love to see more of it, as well as to share it with all our visitors. Thanks for your attention and interest in this plan. Henry A Diaz

#5369

Name: herron, elizabeth

Correspondence: I realize the ranches and dairy business will be affected. However, I feel there has been plenty of time for the family businesses to cope with the issue of the wild elk in a compromise. But I have not heard of a compromise forthcoming and I want to protect the native elk.

#5370

Name: Praetzel, Susanna

Correspondence: Please do not remove or harm the Elk in west Marin. These beautiful animals have more right to live here than cattle. And besides, the cattle very harmful to our climate crisis, and are murdered at a young age for human greed. No one needs to eat meat or drink cow's milk. Dairy cows suffer acute greed when their calves are

stolen. Dairy and Meat Production need to be phased out and replaced by environmentally safe alternatives.  
Leave the elk alone!!

#5371

Name: Altvater, Kurt

Correspondence: I'm writing to support the public access and bicycling improvements outlined under Alternatives B, C, D, E, and F. I strongly support proposals that would lead to the planning and implementation of bicycling routes on trails, ranch roads, and pathways throughout the planning area, including but not limited to: 1) a connection between Devil's Gulch and Platform Bridge Road using existing ranch roads, 2) a connection between Bolinas Ridge Trail at Olema Hill and Point Reyes Station to serve as an interim connection for the Cross Marin Trail, 3) a connection between Bolinas Ridge Trail and Five Brooks Stables using existing ranch roads 4) a connection between Drakes Estero and Abbotts Lagoon Trail using existing ranch roads, 5) a connection between Marshall Beach Trailhead and Pierce Point Road using existing ranch roads, and 6) an Estero Trail loop using existing ranch roads. I encourage NPS to collaborate with ranchers and other stakeholders to educate the public and address concerns related to public access on working ranch lands.

The improvements outlined above would enable and encourage me to visit the Seashore more regularly-and by bike, rather than car. I would feel much safer riding in the Seashore and surrounding areas on trails, pathways, and ranch roads, rather than on roads shared with fast-moving vehicular traffic. Bicycling opportunities are currently very limited and fragmented, so any improvements in connectivity and the creation of new loop options would enable me to enjoy more of the Seashore and surrounding areas by bike.

#5372

Name: N/A, N/A

Correspondence: Please adopt Alternative F, which would discontinue farming and ranching opportunities in the park and expand visitor opportunities. Tell the NPS that the preservation of native wild species must take precedence over farming and ranching activities. Remind it that grazing negatively affects ecosystems, causing water pollution and soil erosion, spreading invasive species and disease, and harming endangered species.

#5373

Name: Klein, JoAnne

Correspondence: Have humans gone mad? Displacing revered wildlife in favor of agricultural concerns? How about accommodating the wildlife and telling the agricultural community they are NOT more important than the ecology, environment, greed, and their careless disregard for the beauty in our country will no longer be tolerated. And further, WHY is the obvious always required to be objected to, why doesn't BLM and Park Services, etc., take the side of and step in to PROTECT what we old dear (deer?). Just how much money goes into "convincing" governments to side with the greed and grift and the pursuit of personal wealth? ENOUGH!!! PROTECT OUR WILDLIFE! NOT the moneygrabbers.

#5374

Name: Rabin, Ariel

Correspondence: As a cyclist, I have been biking in the Pt Reyes area for over a decade... While the roads are spectacular, they are also crowded and busy nearly every weekend. I believe the trails and fire roads around West Marin are some of the most beautiful in California... Bear Valley Trail, Wildcat Beach from Five Brooks, Drakes Estero Trail are all amazing. However, so many of the great trails lead to turnaround points and its hard to connect these trails to one another without riding on the highway or busy roads. I am excited by the possibility of new trail access and connectivity for cyclists. I support the cycling access improvements outlined in Alternatives B, C, D, E and F that create:



A connection between Devil's Gulch and Platform Bridge Road using existing ranch roads A connection between Bolinas Ridge Trail at Olema Hill and Point Reyes Station as a connection for the Cross Marin Trail. A connection between Marshall Beach Trailhead and Pierce Point Road using existing ranch roads. A connection between Drakes Estero and Abbotts Lagoon Trail using existing ranch roads An Estero Trail loop using existing ranch roads. A connection between Bolinas Ridge Trail and Five Brooks Stables using existing ranch roads. Collaborate with ranchers and other stakeholders to educate the public and address concerns related to public access on working ranch lands.

These connections would open a lot of off-highway bike connectivity in Pt Reyes that would get cyclists off busy highways and park roads and make everyone feel safer. I would love to see expanded bike access in one of my favorite places in CA. Thank you for the consideration and I hope to see these alternatives accepted and someday opened to the public.

#5375

Name: Eldredge, Jack

Correspondence: I'm writing to support the public access and bicycling improvements outlined under Alternatives B, C, D, E, and F. I strongly support proposals that would lead to the planning and implementation of bicycling routes on trails, ranch roads, and pathways throughout the planning area, including but not limited to: 1) a connection between Devil's Gulch and Platform Bridge Road using existing ranch roads, 2) a connection between Bolinas Ridge Trail at Olema Hill and Point Reyes Station to serve as an interim connection for the Cross Marin Trail, 3) a connection between Bolinas Ridge Trail and Five Brooks Stables using existing ranch roads 4) a connection between Drakes Estero and Abbotts Lagoon Trail using existing ranch roads, 5) a connection between Marshall Beach Trailhead and Pierce Point Road using existing ranch roads, and 6) an Estero Trail loop using existing ranch roads. I encourage NPS to collaborate with ranchers and other stakeholders to educate the public and address concerns related to public access on working ranch lands.

The improvements outlined above would enable and encourage me to visit the Seashore more regularly-and by bike, rather than car. I would feel much safer riding in the Seashore and surrounding areas on trails, pathways, and ranch roads, rather than on roads shared with fast-moving vehicular traffic. Bicycling opportunities are currently very limited and fragmented, so any improvements in connectivity and the creation of new loop options would enable me to enjoy more of the Seashore and surrounding areas by bike.

#5376

Name: moritsch, marc

Correspondence: Alternative F is the only correct answer. Stop the dairy and cattle ranching now, time is up. This park needs to be protected for everyone, not just welfare special interests. Come on NPS grow a pair and do the right thing!!!

Alternative F!

#5377

Name: N/A, N/A

Correspondence: I'm writing to support the public access and bicycling improvements outlined under Alternatives B, C, D, E, and F. I strongly support proposals that would lead to the planning and implementation of bicycling routes on trails, ranch roads, and pathways throughout the planning area, including but not limited to: 1) a connection between Devil's Gulch and Platform Bridge Road using existing ranch roads, 2) a connection between Bolinas Ridge Trail at Olema Hill and Point Reyes Station to serve as an interim connection for the Cross Marin Trail, 3) a connection between Bolinas Ridge Trail and Five Brooks Stables using existing ranch roads 4) a connection between Drakes Estero and Abbotts Lagoon Trail using existing ranch roads, 5) a connection between Marshall Beach Trailhead and Pierce Point Road using existing ranch roads, and 6) an Estero Trail loop using

existing ranch roads. I encourage NPS to collaborate with ranchers and other stakeholders to educate the public and address concerns related to public access on working ranch lands.

The improvements outlined above would enable and encourage me to visit the Seashore more regularly-and by bike, rather than car. I would feel much safer riding in the Seashore and surrounding areas on trails, pathways, and ranch roads, rather than on roads shared with fast-moving vehicular traffic. Bicycling opportunities are currently very limited and fragmented, so any improvements in connectivity and the creation of new loop options would enable me to enjoy more of the Seashore and surrounding areas by bike.

Thanks, Solon

#5378

Name: Nielsen, Kristina

Correspondence: Please protect the elk. There are better ways to meet the needs of ranchers while balancing biodiversity and natural habitats.

#5379

Name: Lesnick, Marc

Correspondence: I'm writing to support the public access and bicycling improvements outlined under Alternatives B, C, D, E, and F. I strongly support proposals that would lead to the planning and implementation of bicycling routes on trails, ranch roads, and pathways throughout the planning area, including but not limited to: 1) a connection between Devil's Gulch and Platform Bridge Road using existing ranch roads, 2) a connection between Bolinas Ridge Trail at Olema Hill and Point Reyes Station to serve as an interim connection for the Cross Marin Trail, 3) a connection between Bolinas Ridge Trail and Five Brooks Stables using existing ranch roads 4) a connection between Drakes Estero and Abbotts Lagoon Trail using existing ranch roads, 5) a connection between Marshall Beach Trailhead and Pierce Point Road using existing ranch roads, and 6) an Estero Trail loop using existing ranch roads. I encourage NPS to collaborate with ranchers and other stakeholders to educate the public and address concerns related to public access on working ranch lands.

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#5380

Name: Schiav, Cindy

Correspondence: I care about protecting California's wildlife. I oppose the National Park Service's plan to kill native tule elk and expand commercial agriculture in Point Reyes National Seashore and Golden Gate National Recreation Area. I urge the National Park Service to instead restore the lands for wild animal habitat.

We should prioritize the preservation of our public lands and wildlife, not the economic interests of private ranchers. These commercial cattle ranches have serious negative environmental impacts on the park - polluting waterways, causing soil erosion, and harming the many endangered and threatened animals who live on Point Reyes. National parks exist to protect our natural resources and native wildlife. This park should be managed accordingly.

#5381

Name: Wilkinson, Connie

Correspondence: Dear National Park Service,

I care about protecting California's wildlife. I oppose the National Park Service's plan to kill native tule elk and expand commercial agriculture in Point Reyes National Seashore and Golden Gate National Recreation Area. I urge the National Park Service to instead restore the lands for wild animal habitat.

We should prioritize the preservation of our public lands and wildlife, not the economic interests of private ranchers. These commercial cattle ranches have serious negative environmental impacts on the park - polluting waterways, causing soil erosion, and harming the many endangered and threatened animals who live on Point Reyes. National parks exist to protect our natural resources and native wildlife. This park should be managed accordingly.

Our wildlife need us to protect them, they do not have voices so we must act as their voices. Please help us restore their lands.

Thank You, Connie Wilkinson

#5382

Name: Connolly, Markham

Correspondence: I agree and support everything that is written below. I was purely a road cyclist for many years and now have almost gone exclusively to gravel/dirt to avoid the cars and enjoy the serenity and beauty of our off road surroundings. It would be amazing to open up these ranch roads and trails to allow us cyclist have more access to the incredible PRNS. Thank you!

I'm writing to support the public access and bicycling improvements outlined under Alternatives B, C, D, E, and F. I strongly support proposals that would lead to the planning and implementation of bicycling routes on trails, ranch roads, and pathways throughout the planning area, including but not limited to: 1) a connection between Devil's Gulch and Platform Bridge Road using existing ranch roads, 2) a connection between Bolinas Ridge Trail at Olema Hill and Point Reyes Station to serve as an interim connection for the Cross Marin Trail, 3) a connection between Bolinas Ridge Trail and Five Brooks Stables using existing ranch roads 4) a connection between Drakes Estero and Abbotts Lagoon Trail using existing ranch roads, 5) a connection between Marshall Beach Trailhead and Pierce Point Road using existing ranch roads, and 6) an Estero Trail loop using existing ranch roads. I encourage NPS to collaborate with ranchers and other stakeholders to educate the public and address concerns related to public access on working ranch lands.

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#5383

Name: McCrea, Karen

Correspondence: Dear Sir/Madam,

Re: National Park Service (NPS)

I believe the above organisation recently unveiled a draft plan to shoot and kill some of the tule elk living in Point Reyes National Seashore. PLEASE don't be cruel. These animal beings have every right to walk this planet, just

like us. Only unlike human beings they don't wreck & litter it. Think about what you are doing, you must know in your heart that this isn't godly or right.

Thank you for your time.

Sincerely Karen McCrea

#5384

Name: Ackerman, Lynn

Correspondence: Do Not kill the elk. All animals can share the land.

#5385

Name: Parekh, Aanika

Correspondence: I care about protecting California's wildlife. I am 13 years old and I know enough about the world to understand we shouldn't be killing animals just for human needs. I OPPOSE the national park services plan to kill elk and expand on commercial agriculture. We have enough land for agriculture. I implore you to instead expand the land for these beautiful animals. We must prioritize the wellbeing and safety of the wild animals that are under our care. Not the needs of private farmers. The effects of commercial cattle ranchers cannot be undone. They will ruin the park and every animal who depends on it. National Parks were created to protect our resources and the native wildlife. The park should be managed accordingly. When making this decision please think about more than just humans want or what humans need. Think about the animals who depend on this land- more so than the humans do. The only difference is that they don't have to voice to say what they want. That's why I'm here and so many more like me are here: to speak for those who cannot speak for themselves.

#5386

Name: Cunningham, Jennifer

Correspondence: Please protect the Tule Elk in Point Reyes National Seashore in California. Do not let them get gunned down/killed. Let them live in peace with their families, just like we wish to do. Thank you.

Sincerely,

Jennifer L Cunningham

#5387

Name: cockshott, shiela

Correspondence: This is a really terrible idea. The Tule Elk belong there. No more needs to be said.

#5388

Name: Waterman-Rose, Katherine

Correspondence: As a concerned citizen who loves and often visits Point Reyes Natural Seashore, I am shocked that the National Park Service would prioritize the preferences of private ranchers who should have been out of the area years ago over the needs of native tule elk and the enjoyment of park visitors. Fix this mistake, and choose Alternative F, which would restore the land to its originally intended purpose as a visitor-accessible park and wildlife habitat.

#5389

Name: Contreras, Cristian

Correspondence: Hello, my comment is in favor of Alternative F, which would discontinue farming and ranching opportunities in the park and expand visitor opportunities.

The preservation of native wild species must take precedence over farming and ranching activities. In addition, grazing negatively affects ecosystems, causing water pollution and soil erosion, spreading invasive species and disease, and harming endangered species.

#5390

Name: Gang, Peter

Correspondence: As a hiker, runner, and occasional mountain biker, I wholeheartedly support the use of existing roads within jurisdiction of Point Reyes National Seashore by non-motorized mountain bikes.

#5391

Name: Spotts, Richard

Correspondence: September 18, 2019

Dear NPS officials:

Please accept, carefully consider, thoroughly address, and include in the appropriate administrative record my following comments on the National Park Service's (NPS) Draft General Management Plan Amendment for Point Reyes National Seashore (PORE). I have visited PORE and I deeply care about its future management.

I previously submitted extensive scoping comments. I am frankly appalled and outraged that NPS apparently ignored my concerns in preparing its preferred alternative. NPS seems to have been captured by Trumpian forces that gleefully put narrow commercial interests well ahead of the broad public interest. As such, by giving short shrift to the relevant law and science, NPS is doing serious damage to its reputation and credibility. Instead of following the NPS organic act mandates to "preserve and enjoy", NPS now appears to favor "pollute and destroy" as its mission. This must not be allowed to stand.

As you know, under the NPS preferred alternative, fully one-third of PORE would be dedicated to cattle ranching for decades to come. The NPS' own Environmental Impact Statement (EIS) enumerates the impacts of cattle ranching to endangered species, wildlife habitat, water quality, and the climate. However, NPS seeks to ignore these impacts to satisfy 24 ranchers who sold their land to the public nearly 60 years ago yet still run their cattle in this national seashore. This is outrageous and a clear ripe-off of the taxpayers. Adding insult to injury, the NPS preferred alternative, on top of continuing the beef and dairy operations, would allow each rancher to expand to include commercial crops, pigs, sheep, goats, and up to 500 chickens-as well as open retail operations in the Seashore. The EIS avoids any discussion of how the NPS would respond when inevitable conflicts arise between livestock and native wildlife. But when conflicts arise, it could well mean a death sentence for bobcats, foxes, coyotes, raccoons, and birds that prey on the ranchers' small livestock. It is ridiculous for NPS to put itself in the bizarre position of having to approve killing of native wildlife to protect private livestock. This is backwards: the protection of native wildlife should always be a NPS and PORE priority.

I am especially concerned about the fate of native tule elk in PORE. This is reportedly the only NPS unit where these elk are present. This is a rare and iconic California species, which was once widespread but is now limited to a few key habitats. Given this rarity of a native species, I am appalled that cows reportedly outnumber tule elk 10 to 1 in PORE. This is already horribly backward, but the NPS preferred alternative would apparently allow culling 10-15 elk annually to maintain a population 120. Moreover, any free-roaming elk that forage on land leased for cattle would be shot.

The NPS preferred alternative would extend grazing leases from 5 to 20 years, with the addition of 7,600 more acres of the park currently unauthorized for cattle grazing. I understand that local ranches outside the park—that operate on their own land, not the public's land—are using more sustainable ranching practices in order to minimize their impacts to the environment. However, PORE ranchers do not. Under the NPS preferred alternative, methods to counter climate change, such as cutting methane and sequestering carbon, are voluntary.

The NPS preferred alternative talks about extensive monitoring of potential resource damage. However, I doubt that NPS would be able to "walk this talk." In reality, the NPS is already underfunded. Limited staff is already hard pressed to enforce existing grazing lease conditions, let alone the more intensive ranching foreseen under this plan. PORE has been overstocked and overgrazed. Poor ranching practices have led to soil erosion, water pollution, habitat destruction, invasive plants, and spreading cattle disease to the park's wildlife. How can NPS turn a blind eye to these harsh realities? Do NPS employees work for the private ranchers or the American people?

In addition, I concur with the following points:

- Point Reyes National Seashore is supposed to be managed under the Point Reyes Act for "maximum protection, restoration, and preservation of the natural environment." There's no mandate for prioritizing commercial agricultural leases on these public lands.
- Natural values, native wildlife, public access and enjoyment should take priority over commercial activities at Point Reyes. • Tule elk are an important part of the landscape at Point Reyes. Their recovery is a result of successful native ecosystem restoration, which is a key element of the Park Service's mission. It's taken a lot of time, money and effort to restore tule elk to Point Reyes, the only national park where they live. Tule elk should be allowed to roam free and forage in the park - not shot, removed, fenced or treated as problem animals.
- Right now the Point Reyes ranches enjoy not only subsidized grazing fees and housing, but also taxpayer-funded infrastructure and road improvements, and publicly funded projects. But commercial activities at Point Reyes should be required to accommodate native wildlife - not the other way around.
- The Park Service shouldn't allow any new agricultural activities at Point Reyes. Planting artichokes or other row crops will attract birds. And introducing sheep, goats, pigs or chickens will attract native predators such as coyotes, bobcats and foxes. Expanded ranching would only create new wildlife conflicts.
- Cattle ranching should not be allowed because it's inconsistent with preserving the natural environment. And agricultural activities such as mowing shouldn't be allowed in seashore areas where they harm endangered species or wildlife habitat, impair water quality, cause excessive erosion or spread invasive plants/diseases.
- Cattle are the seashore's primary source of greenhouse gases. So the Park Service's preferred alternative is inconsistent with its own "Climate Friendly Parks" plan.

In light of the above concerns, I strongly oppose and urge NPS to reject the preferred alternative. Indeed, the preferred alternative represents the opposite of what NPS and PORE should be doing.

Instead, I strongly support and urge NPS to adopt and implement Alternative F, for no more ranching. Consistent with the relevant law and science, and in recognition that these ranches were purchased long ago for public conservation purposes, the PORE ranches should be rapidly phased out. Commercial livestock grazing should be prohibited throughout PORE. The protection of native wildlife and plants, including special status species, should be the top priority. Biological diversity should be maintained and restored, and natural ecological processes allowed to occur without human interference. Degraded habitats should be restored to healthy conditions. Historic ranch buildings should be converted for public education or scientific research, or razed if they could not serve a legitimate public purpose.

Please include me on the notification list to be informed when the FEIS or a Supplemental DEIS becomes available for public review.

Thank you very much for considering my comments.

Sincerely,

Richard Spotts

#5392

Name: Waterman Rose, Aaron

Correspondence: I recently read the Op-Ed by Barbara Moritsch on the National Traveler and was alarmed to hear that the National Parks Service was seriously considering the reckless expansion of the cattle farms in Point Reyes. In this age where we can see the effects of climate change, we need every inch of parkland preserved. It is the moral imperative of the National Parks Service to preserve Point Reyes and the Tule Elk, and it is the law that the cattle ranchers should leave that land to its intended purpose. At least that was the intention when the NPS was given taxpayer money to buy the land from the cattle ranchers. It is time fulfill the promise that the NPS has made to the American people. The cattle ranchers have been given ample time to prepare themselves for this day. Adopt alternative F and discontinue all ranching operations at Point Reyes. It is not enough to just pay lip service to the ideals of environmentalism and preservation. The NPS must take action and do what is best for our country, and what is best for our planet! End cattle ranching in Point Reyes and we can begin to restore the park to its natural glory.

#5393

Name: N/A, Barbara

Correspondence: Please protect tule elk at Point Reyes National Seashore in California. Do not allow farmers and ranchers who have been leasing thousands of acres of the park to graze cattle to kill these beautiful, regal native animals.

Thank you.

#5394

Name: Holderfield, Shana

Correspondence: I don't think I'm a PETA member quite yet. I am a supporter, though.

#5395

Name: west, carrie

Correspondence: the preservation of native wild species must take precedence over farming and ranching activities. grazing negatively affects ecosystems, causing water pollution and soil erosion, spreading invasive species and disease, and harming endangered species.

#5396

Name: Moser, Bee

Correspondence: Dear Reader,

I am urging you to adopt Alternative F, which discontinues farming and ranching opportunities in the park and expand visitor opportunities. It is imperative that the preservation of native wild species must take precedence

over farming and ranching activities. Grazing does negatively affect ecosystems, causing water pollution and soil erosion, spreading invasive species and disease, and harming endangered species.

Thank you, Bee Moser

#5397

Name: Lasken, Andrew

Correspondence: I can't fathom how NPS could come to the conclusion that ranchers should be given priority over wildlife. Tule elk are one of the main reasons travelers visit Point Reyes. The elk are a benefit to the the public, whereas livestock only benefit the ranchers. In a time where the Amazon is burning to make room for livestock, shooting elk for ranchers would be a shameful step for our country to take.

#5398

Name: Davis, John

Correspondence: I'm writing to support the public access and bicycling improvements outlined under Alternatives B, C, D, E, and F. I strongly support proposals that would lead to the planning and implementation of bicycling routes on trails, ranch roads, and pathways throughout the planning area, including but not limited to: 1) a connection between Devil's Gulch and Platform Bridge Road using existing ranch roads, 2) a connection between Bolinas Ridge Trail at Olema Hill and Point Reyes Station to serve as an interim connection for the Cross Marin Trail, 3) a connection between Bolinas Ridge Trail and Five Brooks Stables using existing ranch roads 4) a connection between Drakes Estero and Abbotts Lagoon Trail using existing ranch roads, 5) a connection between Marshall Beach Trailhead and Pierce Point Road using existing ranch roads, and 6) an Estero Trail loop using existing ranch roads. I encourage NPS to collaborate with ranchers and other stakeholders to educate the public and address concerns related to public access on working ranch lands.

The improvements outlined above would enable and encourage me to visit the Seashore more regularly-and by bike, rather than car. I would feel much safer riding in the Seashore and surrounding areas on trails, pathways, and ranch roads, rather than on roads shared with fast-moving vehicular traffic. Bicycling opportunities are currently very limited and fragmented, so any improvements in connectivity and the creation of new loop options would enable me to enjoy more of the Seashore and surrounding areas by bike.

#5399

Name: Mckeag, Janet

Correspondence: The Elk are a native wild species and their protection should take precedence over farming activities that will, over time, erode the soil and damage the land.

#5400

Name: Lowers, William

Correspondence: Plan F is the only way to go... the National Park system should not be in the ranching business.

#5401

Name: Medina, Amy

Correspondence: Please don't do away with this park and the Tule Elk. We just visited there recently for the first time and were in awe of the natural beauty and the Elk. Places like this are rare and become fewer and fewer in this country. This is a special place mostly unspoiled by humans unlike other "parks" are littered with trash and graffiti. Also there are fewer and fewer safe places where nature can exist and aren't pushed out by humans.



#5402

Name: Taylor, Janee

Correspondence: I recently saw an old Huell Howser California Gold program where he visited the tule elk. They are magnificent animals and I don't know how you can even think of shooting them. The National Park is their home, not the commercially raised cattle. Please save them and their habitat.

#5403

Name: N/A, N/A

Correspondence: Thank you for the opportunity to comment on your plan.

After reading your general management plan, I support alternative "F" - the no ranching option. Livestock should not take priority over wildlife, and I do not believe livestock belongs in a national park, since according to your mission, the NPS '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.'

Please consider removing the livestock and allowing the land to recover from what appears to be immense damage so that wildlife might thrive and the land is there for all people to enjoy.

Thank you for your consideration. Jennifer Howe

#5404

Name: Hoff, Krista

Correspondence: I grew up visiting and volunteering in Point Reyes National Seashore. I do not support any lethal removal of the elk. I would like to see ranching operations decreased or eliminated entirely from the Seashore. Cattle have a negative impact on the local animal species, plants, and ocean life. Their existence is not compliant with the original goals of the park service when they bought the land from the farmers and created the National Seashore. Ranching was not one of the intended purposes of the parks. In the enabling legislation, Congress established Point Reyes National Seashore in 1962 "to save and preserve, for the purposes of public recreation, benefit, and inspiration, a portion of the diminishing seashore of the United States that remains undeveloped." The purchase of the ranches clearly indicates that the intent was to remove the ranching operations in support of the enabling legislation.

Therefore, I support Alternatives E and F.

Additionally, I would like to see increased access for bikes in the Seashore. Bike access improvements would enable me to visit the Seashore by bike, rather than car, reducing the carbon footprint needed to access the park. I would feel much safer riding with my family in Pt. Reyes National Seashore and surrounding areas on trails, pathways, and ranch roads, rather than on roads shared with fast-moving vehicular traffic.

#5405

Name: NETZLOFF-LUNA, MICHELLE

Correspondence: I am sickened and heartbroken to hear of the National Park Service's plan to kill native tule elk and expand commercial agriculture in Point Reyes National Seashore and Golden Gate National Recreation Area. The job of the National Park Service is to protect lands and the animal inhabitants, not destroy animal habitat.

I whole heartedly support the following statement: "We should prioritize the preservation of our public lands and wildlife, not the economic interests of private ranchers. These commercial cattle ranches have serious negative environmental impacts on the park - polluting waterways, causing soil erosion, and harming the many endangered and threatened animals who live on Point Reyes. National parks exist to protect our natural resources and native

wildlife. This park should be managed accordingly." There are plenty of cattle ranches in this country, we don't need more! These businesses have proven records of adding pollution, suffering and destruction. This is about money, not doing the right thing for the planet and the wildlife. Please do NOT approve of and execute this plan.

#5406

Name: Potter, Doris

Correspondence: I care deeply about California's wildlife. I oppose the National Park Service's plan to kill native tule elk and expand commercial agriculture in Point Reyes National Seashore and Golden Gate National Recreation Area. I urge the National Park Service to instead restore the lands for wild animal habitat.

We should prioritize the preservation of our public lands and wildlife, not the economic interests of private ranchers. These commercial cattle ranches have serious negative environmental impacts on the park - polluting waterways, causing soil erosion, and harming the many endangered and threatened animals who live on Point Reyes. National parks exist to protect our natural resources and native wildlife. This park should be managed accordingly.

#5407

Name: Botts, Lindsey

Correspondence: Why is a National Park that was bought and paid for still being treated as ranch land. When I visit Point Reyes, I don't want to see ranches. I want to visit for the elk and the natural beauty. It's time ranching be taken out of the park. That was the agreement and you should stick to it.

Alternative F is the only alternative that is in keeping with the enabling legislation and stated purposes of the parks. If you look carefully at the DEIS, the data all support the adoption of Alternative F, not Alternative B. Alternative F would benefit soils, water quality, air quality, elk, and the experience of park visitors. Impacts of Alternative F on vegetation and soils cannot be easily summarized, but if the NPS would commit to habitat restoration after the cows are removed, both vegetation and wildlife would benefit overall from cessation of ranching. The same cannot be said about any of the other alternatives.

The parks were not intended to support ranching in perpetuity. To grant ranchers new 20-year leases and allow "diversification" by permitting pigs, chickens, sheep, and goats; horse boarding; row crops; processing of dairy products; and public farm stays and tours would be huge steps backward and will further harm the natural environment of the parks over the long term. If the NPS' Preferred Alternative is adopted it's likely that ranching on these park lands will never end, the land will continue to be degraded, and the millions of dollars the American people paid for these lands (money that has been kept by the ranchers) will be for naught. It's time to phase out the ranches and manage the parks for the superlative natural beauty and diversity they offer - it's time to adopt Alternative F.

#5408

Name: Powell, Antonia

Correspondence: I care about protecting California's wildlife.

I strongly oppose the National Park Service's plan to kill native tule elk and expand commercial agriculture in Point Reyes National Seashore and Golden Gate National Recreation Area. I urge the National Park Service to instead restore the lands for wild animal habitat.

We should prioritize the preservation of our public lands and wildlife, not the economic interests of private ranchers. These commercial cattle ranches have serious negative environmental impacts on the park - polluting waterways, causing soil erosion, and harming the many endangered and threatened animals who live on Point Reyes.

National parks exist to protect our natural resources and native wildlife. This park should be managed accordingly.

#5409

Name: Lacoste, Sharon

Correspondence: Wildlife and habitat first! Get ranchers off public lands. The meat produced is tons of methane in the atmosphere. I'm tired of people trying to kill me in the name of their personal business interests. Ranchers are, I hope, headed for extinction. When it happens, it will be none too soon.

#5410

Name: Driest, Edith

Correspondence: To the National Park Service: Commercial agriculture shouldn't be valued over wildlife.

#5411

Name: BRUNE, LINDA

Correspondence:

I'm writing to support the public access and bicycling improvements outlined under Alternatives B, C, D, E, and F. I strongly support proposals that would lead to the planning and implementation of bicycling routes on trails, ranch roads, and pathways throughout the planning area, including but not limited to: 1) a connection between Devil's Gulch and Platform Bridge Road using existing ranch roads, 2) a connection between Bolinas Ridge Trail at Olema Hill and Point Reyes Station to serve as an interim connection for the Cross Marin Trail, 3) a connection between Bolinas Ridge Trail and Five Brooks Stables using existing ranch roads 4) a connection between Drakes Estero and Abbotts Lagoon Trail using existing ranch roads, 5) a connection between Marshall Beach Trailhead and Pierce Point Road using existing ranch roads, and 6) an Estero Trail loop using existing ranch roads. I encourage NPS to collaborate with ranchers and other stakeholders to educate the public and address concerns related to public access on working ranch lands.

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Let's help the earth, fight climate change, and promote access for all who want a healthy life.

Linda Brune

#5412

Name: Compton, Advocate/Activist/Humanist, Carla

Correspondence: PEPC

#5413

Name: N/A, N/A

Correspondence: I'm writing to support the public access and bicycling improvements outlined under Alternatives B, C, D, E, and F. I strongly support proposals that would lead to the planning and implementation of bicycling routes on trails, ranch roads, and pathways throughout the planning area, including but not limited to: 1) a connection between Devil's Gulch and Platform Bridge Road using existing ranch roads, 2) a connection

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#5414

Name: sambrano, barbara

Correspondence: The wild Mustangs are our heritage and should be given plenty of room to roam. A lot of people are not eating meat anymore so the rich ranchers don't need all that room. Protect the horses not the ranchers. Stop the slaughter of our heritage do birth control and actual sales not the slaughter houses auctions

#5415

Name: Firebaugh, John

Correspondence: I'm writing to support the public access and bicycling improvements outlined under Alternatives B, C, D, E, and F. I strongly support proposals that would lead to the planning and implementation of bicycling routes on trails, ranch roads, and pathways throughout the planning area, including but not limited to: 1) a connection between Devil's Gulch and Platform Bridge Road using existing ranch roads, 2) a connection between Bolinas Ridge Trail at Olema Hill and Point Reyes Station to serve as an interim connection for the Cross Marin Trail, 3) a connection between Bolinas Ridge Trail and Five Brooks Stables using existing ranch roads 4) a connection between Drakes Estero and Abbotts Lagoon Trail using existing ranch roads, 5) a connection between Marshall Beach Trailhead and Pierce Point Road using existing ranch roads, and 6) an Estero Trail loop using existing ranch roads. I encourage NPS to collaborate with ranchers and other stakeholders to educate the public and address concerns related to public access on working ranch lands.

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#5416

Name: N/A, N/A

Correspondence: I'm writing to support the public access and bicycling improvements outlined under Alternatives B, C, D, E, and F. I strongly support proposals that would lead to the planning and implementation of bicycling routes on trails, ranch roads, and pathways throughout the planning area, including but not limited to: 1) a connection between Devil's Gulch and Platform Bridge Road using existing ranch roads, 2) a connection between Bolinas Ridge Trail at Olema Hill and Point Reyes Station to serve as an interim connection for the Cross Marin Trail, 3) a connection between Bolinas Ridge Trail and Five Brooks Stables using existing ranch roads 4) a connection between Drakes Estero and Abbotts Lagoon Trail using existing ranch roads, 5) a connection between Marshall Beach Trailhead and Pierce Point Road using existing ranch roads, and 6) an Estero Trail loop using

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#5417

Name: Tamura, Marcus

Correspondence: I am a wildland seed collector in the park and see firsthand the effects of grazing on the natural ecosystem where grazing is allowed. I'd also like to say that I've worked in many BLM lands in the west and currently eat beef and dairy products. That being said I've come to learn and value the unique diversity Point Reyes has to offer. From a botanical perspective the ranch lands of point Reyes encompass some very threatened and continually degrading habitat. One example is Bull point trail around Creamery Bay. I have run across many rare plant species here but have also seen throughout the year cattle completely destroy a vibrant population. I am not calling for the complete eradication of cattle. I understand from the ranchers perspective this is their livelihood and way or life. If I had it my way I would compromise by allowing ranching in certain areas that are already degraded to the point of no return. Other areas that still host many populations of sensitive species like Bull Point should be permanently closed from grazing. To adequately access this threshold there needs to be extensive plant and animals surveys done across all current lands open to grazing. Another point to make is that with the human caused decline of natural predators of Tule Elk, their population does need to be human managed. Their current numbers likely don't need to be controlled with a decrease in cattle but will need management in the future. Also cattle managers NEED stricter policies when it comes to transferring nonnative plants and animals. In the current age of Sudden Oak Death and New Zealand Mud Snails we need to set a precedent in nonnative pest BPMs. Neither the cattle or elk will be leaving point Reyes in the near future so we need to set policies that allow them to coexist while protecting the natural wonders that have attracts thousands of people to this area.

#5418

Name: Perry, Brenda

Correspondence: I'm sure there are other methods of controlling animal populations besides killing them. It's time to get progressive about this rather than using antiquated and barbaric methods, I hope the PEPC can step up to find a civilized answer to their problem.

#5419

Name: kunstman, suzanne

Correspondence: please let's protect the Tule Elk.

thank you,

suzanne Kunstman

#5420

Name: Cummings, Earle

Correspondence: As a wildlife biologist, then employed by California DFG, I with my Supervisor, Oscar Brunetti, were involved in the removal of introduced exotic Fallow and Axis deer, in anticipation of the reintroduction of tule elk to the seashore. Among the things we learned, while autopsying the animals we killed was that livestock

pests, like liver flukes and lungworms were compromising the health of both the exotic deer and the resident native blacktail deer.

The only alternative that would correct this injury to native wildlife is Alternative F, but there would still need to be substantial work done on water sources that have been contaminated by livestock parasites, and treatment of the native wildlife that are hosting the parasites now. A source of funding for parasite management for wildlife is not discussed in any of the alternatives, and it is in the interest of the livestock operators to carry out pest remediation, so retaining some livestock grazing on the condition that pest and disease control are included might make those operations better in the interest of the elk, than complete elimination.

I write as a Certified Wildlife Biologist, and was alerted to this comment opportunity by The Wildlife Society, in which I maintain membership, though retired since 2002.

#5421

Name: N/A, N/A

Correspondence: We need a new vision for the Seashore: No ranching. (Alternative D) Phase out the ranches. Disallow all commercial livestock in the park. Prioritize wildlife over domestic cattle. Biodiversity should not be sacrificed to private ranching, Restore wildlife habitat and native plant communities Repurpose historic ranch buildings for scientific research, interpretation and public education.

**DON'T CATER TO THE RANCHERS BUT INSTEAD SAVE OUR WILDLIFE!**

#5422

Name: Tuorto, Vicky

Correspondence: To Whom It May Concern

Please don't shoot the elk at Pt. Reyes. Think of the afterlife.

#5423

Name: Fleming, Daniel

Correspondence: I'm writing to support the public access and bicycling improvements outlined under Alternatives B, C, D, E, and F. I strongly support proposals that would lead to the planning and implementation of bicycling routes on trails, ranch roads, and pathways throughout the planning area, including but not limited to: 1) a connection between Devil's Gulch and Platform Bridge Road using existing ranch roads, 2) a connection between Bolinas Ridge Trail at Olema Hill and Point Reyes Station to serve as an interim connection for the Cross Marin Trail, 3) a connection between Bolinas Ridge Trail and Five Brooks Stables using existing ranch roads 4) a connection between Drakes Estero and Abbots Lagoon Trail using existing ranch roads, 5) a connection between Marshall Beach Trailhead and Pierce Point Road using existing ranch roads, and 6) an Estero Trail loop using existing ranch roads. I encourage NPS to collaborate with ranchers and other stakeholders to educate the public and address concerns related to public access on working ranch lands.

The improvements outlined above would enable and encourage me to visit the Seashore more regularly-and by bike, rather than car. I would feel much safer riding in the Seashore and surrounding areas on trails, pathways, and ranch roads, rather than on roads shared with fast-moving vehicular traffic. Bicycling opportunities are currently very limited and fragmented, so any improvements in connectivity and the creation of new loop options would enable me to enjoy more of the Seashore and surrounding areas by bike.

Daniel Fleming

#5424

Name: Baldwin , Suzanne

Correspondence: I oppose the National Park Service's plan to kill native tule elk and expand commercial agriculture in Point Reyes National Seashore and Golden Gate National Recreation Area. I urge the National Park Service to instead restore the lands for wild animal habitat. We should prioritize the preservation of our public lands and wildlife, not the economic interests of private ranchers. These commercial cattle ranches have serious negative environmental impacts on the park - polluting waterways, causing soil erosion, and harming the many endangered and threatened animals who live on Point Reyes. National parks exist to protect our natural resources and native wildlife. This park should be managed accordingly. I am so tired of commercial interests taking precedence over natural resources and wildlife. Enough is enough!

#5425

Name: Dahl, Brenda

Correspondence: I'm writing to support the bicycling improvements outlined under Alternatives B, C, D, E, and F. I strongly support proposals that aid the planning and implementation of bicycling routes on trails, ranch roads, and pathways throughout the planning area, including but not limited to: 1) a connection between Devil's Gulch and Platform Bridge Road using existing ranch roads, 2) a connection between Bolinas Ridge Trail at Olema Hill and Point Reyes Station to serve as an interim connection for the Cross Marin Trail, 3) a connection between Bolinas Ridge Trail and Five Brooks Stables using existing ranch roads 4) a connection between Drakes Estero and Abbotts Lagoon Trail using existing ranch roads, 5) a connection between Marshall Beach Trailhead and Pierce Point Road using existing ranch roads, and 6) an Estero Trail loop using existing ranch roads. I encourage NPS to collaborate with ranchers and other stakeholders to educate the public and address concerns related to public access on working ranch lands.

The improvements outlined above would help motivate me to visit the Seashore more regularly by bike, rather than car. I would feel much safer riding in the Seashore and surrounding areas on trails, pathways, and ranch roads, rather than on roads shared with fast-moving vehicular traffic. As you are aware there have been many serious and sometimes deadly bike-car collisions in the area. There are some agitated drivers who do not want to share roads with bikes.

Bicycling opportunities around the Seashore are currently very limited and fragmented, so any improvements in connectivity and the creation of new connected options would make it more enjoyable and safer for bike riders.

Thanks for listening!

#5426

Name: Yost, Don

Correspondence: Adopt Alternative F. That will: • Phase out all ranching as was originally intended when the park was established, • Manage the Seashore for the natural values it was created to preserve - land, water, wildlife, • Protect wildlife over livestock, • Restore the pastoral zone for wildlife habitat, native plant communities, scientific research, & education;

#5427

Name: Leaverton, Daniel

Correspondence: I'm writing to support the public access and bicycling improvements outlined under Alternatives B, C, D, E, and F. I strongly support proposals that would lead to the planning and implementation of bicycling routes on trails, ranch roads, and pathways throughout the planning area, including but not limited to: 1) a connection between Devil's Gulch and Platform Bridge Road using existing ranch roads, 2) a connection between Bolinas Ridge Trail at Olema Hill and Point Reyes Station to serve as an interim connection for the Cross

Marin Trail, 3) a connection between Bolinas Ridge Trail and Five Brooks Stables using existing ranch roads 4) a connection between Drakes Estero and Abbotts Lagoon Trail using existing ranch roads, 5) a connection between Marshall Beach Trailhead and Pierce Point Road using existing ranch roads, and 6) an Estero Trail loop using existing ranch roads. I encourage NPS to collaborate with ranchers and other stakeholders to educate the public and address concerns related to public access on working ranch lands.

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#5428

Name: Marvell, Shelby

Correspondence: I'm writing to support the public access and bicycling improvements outlined under Alternatives B, C, D, E, and F. I strongly support proposals that would lead to the planning and implementation of bicycling routes on trails, ranch roads, and pathways throughout the planning area, including but not limited to: 1) a connection between Devil's Gulch and Platform Bridge Road using existing ranch roads, 2) a connection between Bolinas Ridge Trail at Olema Hill and Point Reyes Station to serve as an interim connection for the Cross Marin Trail, 3) a connection between Bolinas Ridge Trail and Five Brooks Stables using existing ranch roads 4) a connection between Drakes Estero and Abbotts Lagoon Trail using existing ranch roads, 5) a connection between Marshall Beach Trailhead and Pierce Point Road using existing ranch roads, and 6) an Estero Trail loop using existing ranch roads. I encourage NPS to collaborate with ranchers and other stakeholders to educate the public and address concerns related to public access on working ranch lands.

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Thanks, Shelby Kira Marvell

#5429

Name: Hutchinson, Nicole

Correspondence: I care about protecting California's wildlife. I oppose the National Park Service's plan to kill native tule elk and expand commercial agriculture in Point Reyes National Seashore and Golden Gate National Recreation Area. I urge the National Park Service to instead restore the lands for wild animal habitat.

We should prioritize the preservation of our public lands and wildlife, not the economic interests of private ranchers. These commercial cattle ranches have serious negative environmental impacts on the park - polluting waterways, causing soil erosion, and harming the many endangered and threatened animals who live on Point Reyes. National parks exist to protect our natural resources and native wildlife. This park should be managed accordingly.

Thank you for speaking up for the elk who call Point Reyes home!

#5430

Name: N/A, N/A

Correspondence: I'm writing to support the public access and bicycling improvements outlined under



Alternatives B, C, D, E, and F. I strongly support proposals that would lead to the planning and implementation of bicycling routes on trails, ranch roads, and pathways throughout the planning area, including but not limited to: 1) a connection between Devil's Gulch and Platform Bridge Road using existing ranch roads, 2) a connection between Bolinas Ridge Trail at Olema Hill and Point Reyes Station to serve as an interim connection for the Cross Marin Trail, 3) a connection between Bolinas Ridge Trail and Five Brooks Stables using existing ranch roads 4) a connection between Drakes Estero and Abbotts Lagoon Trail using existing ranch roads, 5) a connection between Marshall Beach Trailhead and Pierce Point Road using existing ranch roads, and 6) an Estero Trail loop using existing ranch roads. I encourage NPS to collaborate with ranchers and other stakeholders to educate the public and address concerns related to public access on working ranch lands.

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#5431

Name: Epstein, David

Correspondence: I'm writing to support the public access and bicycling improvements outlined under Alternatives B, C, D, E, and F. I strongly support proposals that would lead to the planning and implementation of bicycling routes on trails, ranch roads, and pathways throughout the planning area, including but not limited to: 1) a connection between Devil's Gulch and Platform Bridge Road using existing ranch roads, 2) a connection between Bolinas Ridge Trail at Olema Hill and Point Reyes Station to serve as an interim connection for the Cross Marin Trail, 3) a connection between Bolinas Ridge Trail and Five Brooks Stables using existing ranch roads 4) a connection between Drakes Estero and Abbotts Lagoon Trail using existing ranch roads, 5) a connection between Marshall Beach Trailhead and Pierce Point Road using existing ranch roads, and 6) an Estero Trail loop using existing ranch roads. I encourage NPS to collaborate with ranchers and other stakeholders to educate the public and address concerns related to public access on working ranch lands.

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#5432

Name: Dobroszczyk , Jennice

Correspondence: NO Ranching!! plan F. Leave The Elk Be!!!

#5433

Name: corvers, nady

Correspondence: Dear Sir, Madame,

Please adopt Alternative F, which would discontinue farming and ranching opportunities in the park and expand visitor opportunities. The preservation of native wild species must take precedence over farming and ranching activities. Grazing negatively affects ecosystems, causing water pollution and soil erosion, spreading invasive species and disease, and harming endangered species.

Kind Regards, Nady Corvers

#5434

Name: Levin, Jeff

Correspondence: September 18, 2019 Dear Sir:

Why in the world would anyone want to curtail one of the most successful wildlife reintroduction projects in California's history?

I have read there were once about 500,000 tule elk stretching from the lush floodplains of the Central Valley to the grassy coastal hills in California, but by 1874 they were thought to be extinct.

What I learned is that early mariners and explorers wrote about vast herds on the Point Reyes peninsula, but these herds were hunted relentlessly after the Gold Rush. Consequently, their habitat was converted to crops and cattle grazing land.

I understand that after a wealthy landowner, Henry Miller, discovered a dozen or so tule elk in Kern County, the herd grew. Gratefully, the elk became protected in 1971.

The effort to restore tule elk populations has progressed very well. I heard that in 1978, 10 tule elk were moved to the 2,600-acre Tomales Point Elk Reserve at Pierce Point. Apparently, their success there encouraged the Park Service to move 28 animals to the Limantour Beach area, in 1999.

According to what I read, within two years, the free-ranging herd had split up, with some apparently swimming across Drakes Estero, where they began grazing among the cows near the historic ranches.

There are now three elk herds. According to the winter count, 95 free-ranging elk live in the Drakes Beach area, and 130 hang out in the vicinity of Limantour Beach. There are 285 animals in the fenced reserve at Pierce Point.

It flies in the face of history to protect cattle grazing at the historic ranches when 500,000 tule elk narrowly escaped extinction because of it!

We now are graced by about 4,300 tule elk in 25 separate herds in California. Killing any of them in favor of cattle grazing is criminal.

Surely, our sacred public trust is honor, celebrate and protect the natural biodiversity of our national parks. Please do not constrict the long nurtured comeback of tule elk herds.

I can't imagine a single visitor to Pt. Reyes National Seashore just hoping to catch sight of cattle, or to see a ranch. In fact, I often travel to Pierce Point Road specifically in order to see at least one tule elk.

Please respect wildlife over cattle. The elk herd deserves and needs our protection. Their expansion is our success story. In good faith, we need to continue to support and celebrate their comeback from the brink of extinction.

Respectfully, Jeff Levin, LCSW

#5435

Name: Taylor, Rebecca

Correspondence: The Elk should be allowed to remain on the land without harm. Use the land for public access as a park or other community service. They should not be slaughtered so that farmers can raise cattle. There should be enough room for all of them

#5436

Name: Lopez , Theresa

Correspondence: Leave the Tule Elk alone in their natural environment. God placed it there for a reason. There is plenty of grazing land elsewhere. These amazing creatures need to remain where they are. These animals are special and don't easily adapt to different environments. Put your cows and pigs elsewhere. They are much more adaptable.

#5437

Name: Denunzio, Mike

Correspondence: Please adopt Alternative F, which would discontinue farming and ranching opportunities in the park and expand visitor opportunities. The preservation of native wild species must take precedence over farming and ranching activities; grazing negatively affects ecosystems, causing water pollution and soil erosion, spreading invasive species and disease, and harming endangered species. Thanks

#5438

Name: Prinzivalli , Caroline

Correspondence: I strongly oppose the Consideration by the NPS to offer any type of leases for farming or agricultural reasons. Can we please allow nature to flourish as it is with wildlife without more destruction or shrinking of land. If we continue on this type of path there will be no Tule Elk left for my children to see in the wild. They will be minimized to picture books.

#5439

Name: N/A, N/A

Correspondence: Please save the Tule Elk. Private cattle operations don't belong on the public lands if it only means profits for the ranchers and harm to wildlife. These ranchers could have kept their land. They need to fund their own operations and not rape public lands for their benefits. Thank you.

#5440

Name: Chu, Theodore

Correspondence: Elk yes, cows no. A national park should be managed for ecosystem health, not private profit from livestock grazing.

#5441

Name: calandrino van kleef, natasha

Correspondence: Please protect your wildlife

#5442

Name: N/A, N/A

Correspondence: These beautiful Elk are free roaming and have every right to live out their natural lives without fear of being killed because Farmers think they're eating too much of the resources. All living creatures need to eat and need to survive and live out their natural life. Please do not kill these incredible Elk. Why do some humans think killing solves all their problems? It doesn't. Thank you.

#5443

Name: Koved, Michael

Correspondence: I'm writing to support the public access and bicycling improvements outlined under Alternatives B, C, D, E, and F. I strongly support proposals that would lead to the planning and implementation of bicycling routes on trails, ranch roads, and pathways throughout the planning area, including but not limited to: 1) a connection between Devil's Gulch and Platform Bridge Road using existing ranch roads, 2) a connection between Bolinas Ridge Trail at Olema Hill and Point Reyes Station to serve as an interim connection for the Cross Marin Trail, 3) a connection between Bolinas Ridge Trail and Five Brooks Stables using existing ranch roads 4) a connection between Drakes Estero and Abbotts Lagoon Trail using existing ranch roads, 5) a connection between Marshall Beach Trailhead and Pierce Point Road using existing ranch roads, and 6) an Estero Trail loop using existing ranch roads. I encourage NPS to collaborate with ranchers and other stakeholders to educate the public and address concerns related to public access on working ranch lands.

The improvements outlined above would enable and encourage me to visit the Seashore more regularly-and by bike, rather than car. I would feel much safer riding in the Seashore and surrounding areas on trails, pathways, and ranch roads, rather than on roads shared with fast-moving vehicular traffic. Bicycling opportunities are currently very limited and fragmented, so any improvements in connectivity and the creation of new loop options would enable me to enjoy more of the Seashore and surrounding areas by bike.

#5444

Name: Marino, Leslie

Correspondence: I urge you to adopt Alternative F, which would discontinue farming and ranching opportunities in the park and expand visitor opportunities. The preservation of native wild species must take precedence over farming and ranching activities. Grazing negatively affects ecosystems, causing water pollution and soil erosion, spreading invasive species and disease, and harming endangered species.

#5445

Name: Barrett, Reginald

Correspondence: Reginald H. Barrett Certified Wildlife Biologist rbarrett@berkeley.edu November 15, 2019

National Park Service Point Reyes National Seashore 1 Bear Valley Road Point Reyes Station, CA 94956

Comments on Draft EIS for Seashore Management Plan:

I am an Emeritus Professor of Wildlife Management, Department of Environmental Science, Policy, and Management, College of Natural Resources, University of California, Berkeley. I have visited PRNS regularly since it was established in 1962 and carried out research on wildlife and range matters there for several decades. I am quite familiar with the whole Seashore.

The proposed management plan (Alternative B) is clearly biased towards the ranchers who should have been long gone by now. The dairy farms in particular could not exist there without major subsidies, which come from me the taxpayer. I personally would much prefer to see elk when I visit rather than cattle, fences, mud, exotic plants, erosion, and dilapidated houses. I see plenty such things getting there. I understand there are some 5,000 head of cattle on the Seashore now. Decades ago I estimated the carrying capacity for elk to be about 5,000 head. This would have been the most important population of Tule elk to insure this animal against extinction. I see no analysis of the importance of this population of Tule elk to its long term future. One hundred fifty head restricted to Tomales Point is totally inadequate. Therefore, I am strongly against removing any elk from anywhere on the Seashore at this time. Only after the population reaches 5,000 would I support lethal removal of excess animals.

I have taken hundreds of college students to PRNS and they all have been amazed and dismayed that they see way more cattle than wildlife on these field trips. I believe the public (which of course owns the land) feels the same way. It is high time you remove all ranchers from the Seashore (Alternative F).

Sincerely, Reginald H. Barrett

#5446

Name: Keehn, Terry

Correspondence: Please do not allow ranching and dairying to continue on Point Reyes National Seashore.

These agricultural lands were bought and paid for long ago. The ranching should have ended years ago. Just as the Oyster Farm operation should have ended 50 years ago, so must the cattle operations stop right now - it is already 50 years overdue.

Remember, it is Point Reyes National Seashore, NOT Point Reyes National Cattle Ranch.

The claim, oft made, that cattle and dairy ranching on Point Reyes are "Historical" operations is ludicrous. What is historical are the elk, bobcats, coyotes, and other naturally occurring wildlife, NOT CATTLE!

Thank you for your consideration.

#5447

Name: Barrett, Katharine

Correspondence: I am a citizen who has traveled to Pt. Reyes National Seashore several times a years for more than 30 years to view the magnificent Tule Elk. It has been heartening to observe the increase in numbers of this iconic species and look forward to a time when the elk population has returned to the historic level and distribution described by scientists. I honor the multiple-use needs of the park as long as the competing demands of the local ranching community do not impinge on the primary needs of the primary species (elk) being conserved for future generations.

The new information the EIS process must consider is the degree to which cattle numbers must be curtailed in our National Park to maximize the carrying capacity for elk. As a taxpayer, I come to see the native elk not the introduced cattle, which I can easily observe throughout California. One dairy farm or cattle ranch, which school children and the public can visit to learn about cows and local history, is sufficient to fulfill that multiple land use in the park. Elk and cattle compete for grass. When estimating carrying capacity for these two species, I noted that rangeland scientists project two elk for one cow. There are currently about 5,000 cattle grazing in the park, outnumbering the 500 elk ten to one. With the commonly accepted ratio of two to one, elk numbers should be encouraged to rise substantially and cattle numbers should be held to one working ranch. The livestock industry has been and continues to be subsidized at taxpayers' expense. The public's interest in wildlife and native species is at an all-time National high. National public support for cattle ranching is at an historic low. Pt. Reyes National Seashore needs to honor the mission and the supporting scientific research for expansion of elk numbers throughout the park.

#5448

Name: Hogan, Jack

Correspondence: I'm writing to support the public access and bicycling improvements outlined under Alternatives B, C, D, E, and F. I strongly support proposals that would lead to the planning and implementation of bicycling routes on trails, ranch roads, and pathways throughout the planning area, including but not limited to: 1) a connection between Devil's Gulch and Platform Bridge Road using existing ranch roads, 2) a connection between Bolinas Ridge Trail at Olema Hill and Point Reyes Station to serve as an interim connection for the Cross Marin Trail, 3) a connection between Bolinas Ridge Trail and Five Brooks Stables using existing ranch roads 4) a connection between Drakes Estero and Abbotts Lagoon Trail using existing ranch roads, 5) a connection between Marshall Beach Trailhead and Pierce Point Road using existing ranch roads, and 6) an Estero Trail loop using

existing ranch roads. I encourage NPS to collaborate with ranchers and other stakeholders to educate the public and address concerns related to public access on working ranch lands.

In addition to the options above, I would strongly support the consideration of connecting the Bear Valley trail with Stewart fire road, perhaps via Glen Camp. This connection would provide a major gap closure between the northern and southern portions of the park.

The improvements outlined above would enable and encourage me to visit the Seashore more regularly-and by bike, rather than car. I would feel much safer riding in the Seashore and surrounding areas on trails, pathways, and ranch roads, rather than on roads shared with fast-moving vehicular traffic. Bicycling opportunities are currently very limited and fragmented, so any improvements in connectivity and the creation of new loop options would enable me to enjoy more of the Seashore and surrounding areas by bike.

Best regards,

Jack Hogan

#5449

Name: Wixson, E S

Correspondence: Pls protect the elks

#5450

Name: Zelinski, Dawn

Correspondence: Preservation of native wild species must take precedence over farming and ranching activities. Grazing negatively affects ecosystems, causing water pollution and soil erosion, spreading invasive species and disease, and harming endangered species.

As someone who supports and visits National Parks regularly to see wildlife, I'm asking that you choose Alternative F for the Point Reyes National Seashore.

Sincerely, Dawn Zelinski

#5451

Name: Post, Thomas

Correspondence: I have followed this situation very closely for years as I appreciate the beauty of Pt. Reyes as it is truly a special place. I have been hiking out there for over 20 years and have covered much of it and have been leading day hikes for the Sierra Club out there for 14 years. No more as your preferred option is a complete disgrace. This is a national seashore after all.

I realize that you have a tremendous balancing act with accommodating all different groups and am also aware that the ranchers played an integral part in this becoming a national seashore. I am also aware that in order to make it financially, ranchers need to be able to have all sorts of revenue options other than just grazing and milk but this is a national seashore and why are you expanding for profit ventures and compromising wildlife for chickens and goats. Perhaps you are getting pressure from our current administration but your preferred option is a disgrace and makes me not want to visit your park again. Truly sickening.

#5452

Name: Krueger, Shari

Correspondence: We must release and protect our environment as the impact affects waterways, wildlife, as well as our future generations of children.

#5453

Name: Barrett, Paul

Correspondence: I am a citizen who has traveled to Pt. Reyes National Seashore several times a years for more than 30 years to view the magnificent Tule Elk. It has been heartening to observe the increase in numbers of this iconic species and look forward to a time when the elk population has returned to the historic level and distribution described by scientists. I honor the multiple-use needs of the park as long as the competing demands of the local ranching community do not impinge on the primary needs of the primary species (elk) being conserved for future generations. The new information the EIS process must consider is the degree to which cattle numbers must be curtailed in our National Park to maximize the carrying capacity for elk. As a taxpayer, I come to see the native elk not the introduced cattle, which I can easily observe throughout California. One dairy farm or cattle ranch, which school children and the public can visit to learn about cows and local history, is sufficient to fulfill that multiple land use in the park. Elk and cattle compete for grass. When estimating carrying capacity for these two species, I noted that range land scientists project two elk for one cow. There are currently about 5,000 cattle grazing in the park, out numbering the 500 elk ten to one. With the commonly accepted ratio of two to one, elk numbers should be encouraged to rise substantially and cattle numbers should be held to one working ranch. The livestock industry has been and continues to be subsidized at taxpayers' expense. The public's interest in wildlife and native species is at an all-time National high. National public support for cattle ranching is at an historic low. Pt. Reyes National Seashore needs to honor the mission and the supporting scientific research for expansion of elk numbers throughout the park.

Frankly, this new proposal is an outrage.

Sincerely, Paul Barrett

#5454

Name: Jacobs, E

Correspondence: I'm writing to support the public access and bicycling improvements outlined under Alternatives B, C, D, E, and F. I strongly support proposals that would lead to the planning and implementation of bicycling routes on trails, ranch roads, and pathways throughout the planning area, including but not limited to: 1) a connection between Devil's Gulch and Platform Bridge Road using existing ranch roads, 2) a connection between Bolinas Ridge Trail at Olema Hill and Point Reyes Station to serve as an interim connection for the Cross Marin Trail, 3) a connection between Bolinas Ridge Trail and Five Brooks Stables using existing ranch roads 4) a connection between Drakes Estero and Abbotts Lagoon Trail using existing ranch roads, 5) a connection between Marshall Beach Trailhead and Pierce Point Road using existing ranch roads, and 6) an Estero Trail loop using existing ranch roads. I encourage NPS to collaborate with ranchers and other stakeholders to educate the public and address concerns related to public access on working ranch lands.

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#5455

Name: Headley, Sara

Correspondence: I'm writing to support the public access and bicycling improvements outlined under Alternatives B, C, D, E, and F. I strongly support proposals that would lead to the planning and implementation of

bicycling routes on trails, ranch roads, and pathways throughout the planning area, including but not limited to: 1) a connection between Devil's Gulch and Platform Bridge Road using existing ranch roads, 2) a connection between Bolinas Ridge Trail at Olema Hill and Point Reyes Station to serve as an interim connection for the Cross Marin Trail, 3) a connection between Bolinas Ridge Trail and Five Brooks Stables using existing ranch roads 4) a connection between Drakes Estero and Abbotts Lagoon Trail using existing ranch roads, 5) a connection between Marshall Beach Trailhead and Pierce Point Road using existing ranch roads, and 6) an Estero Trail loop using existing ranch roads. I encourage NPS to collaborate with ranchers and other stakeholders to educate the public and address concerns related to public access on working ranch lands.

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Sincerely, Sara Headley

#5456

Name: Fraser, Susan

Correspondence: Alternative B, which involves killing some of the elk and offering another 20-year lease agreement to the farming and ranching families, is currently one of the options under consideration by the National Park Service at the Point Reyes National Seashore in California. The lessees would be allotted over 26,000 acres and allowed to maintain over 5,500 cows! Meanwhile, the Drakes Beach elk herd's population, which numbered a mere 124 animals in 2018, would be limited to 120 animals maximum-and the Limantour herd, which numbered 174 animals in 2018, would be "managed in consideration of ranch operations," meaning that there would be no limit to how many could be killed! Further, Alternative B allows for agricultural "diversification," so the lessees could even bring in pigs and sheep and plant row crops.

I am submitting my comment today to urge the National Park Service to adopt Alternative F, which would discontinue farming and ranching opportunities in the park and expand visitor opportunities. The preservation of native wild species must take precedence over farming and ranching activities. Grazing negatively affects ecosystems, causing water pollution and soil erosion, spreading invasive species and disease. Our wild areas are rapidly disappearing all over America. Please don't make Point Reyes another example of that.

Thank you.

Susan Bessire Fraser

#5457

Name: Steele, Lisa

Correspondence: I care about protecting California's wildlife. I oppose the National Park Service's plan to kill native tule elk and expand commercial agriculture in Point Reyes National Seashore and Golden Gate National Recreation Area. I urge the National Park Service to instead restore the lands for wild animal habitat.

We should prioritize the preservation of our public lands and wildlife, not the economic interests of private ranchers. These commercial cattle ranches have serious negative environmental impacts on the park - polluting waterways, causing soil erosion, and harming the many endangered and threatened animals who live on Point Reyes. National parks exist to protect our natural resources and native wildlife. This park should be managed accordingly



#5458

Name: Teed, Halcyon

Correspondence: This area is designated to protect WILDLIFE. ELK are WILDLIFE. Stop this insanity.

#5459

Name: Niles, Jackie

Correspondence: I support "Expanded Access to Point Reyes National Seashore".

#5460

Name: W, Jade

Correspondence: I'm in favor of protecting the park. Isn't the idea of having a NATIONAL PARK so that we the people can enjoy it? Why is this not a plan to make the park a more inviting place for we the people? Parks are supposed to be supported and wildlife championed, not slaughtered. This park could be the crown jewel of the National Parks, instead it is looked at as a political chess piece so that a few can profit and the many can suffer. This location and the wild beauty of the many habitats is priceless. It is wrong for some to feel entitled to it because of their own greed. Wasn't the original "plan" to phase out the dairy ranches? The ranches have gotten the sweetest deal in history so far and they ought to just be glad they got a good of a run as they have. For the common and greater good this park should be managed as the national treasure it is. The plan for explosive growth of commercial agricultural will be the biggest mistake in National Park history. Once that gets established it will be near impossible to remove. Once the habitat is degraded and Elk slaughter, fields built upon with more equipment it will be done. The park will never be the same again, what is done can not be undone. And what about the farm traffic? Inverness and Point Reyes Station are already having congestion issues. The amount of farm equipment and trucks going down those narrow lanes will be a safety hazard. It's hard enough to pull out of the roadside gravel pull outs and steep driveways on curves with regular traffic, trucks will have a much harder time slowing down to avoid a collision. This plan is ALL BAD, please do not let this happen. I'd much rather see a call for public comments on how to make the park great again. Thank you!

#5461

Name: N/A, N/A

Correspondence: I am writing to plead with Point Reyes National Seashore to prioritize biodiversity and environmental health. Adopt Alternative F now. We are from Illinois and amazed at The beauty of this seashore. To take away any land from this gem for mankind would be awful. Please preserve these lands.

#5462

Name: N/A, N/A

Correspondence: We are fully opposed to killing elks in order to expand areas for cattle

SAVE OUR PRECIOUS PARKS.

#5463

Name: Fouts, John

Correspondence: Pepperwood Preserve is a local expert in rangeland management and its experience and research should be utilized in regulating cattle grazing - rotating fields, etc. As for managing the Tule elk, looking to the Yellowstone experience would suggest that encouraging the "top predators" would be beneficial. In Yellowstone, it was the wolf, for Pt Reyes, it would be the mountain lion. If ranching is eliminated (my preference), there would not be a problem. If ranching is continued, the lease agreements should have restrictions

on the ability to kill mountain lions. Ranchers regularly can get a permit to kill predators of their livestock, including mountain lions. This should be prohibited in the lease agreements.

#5464

Name: Rattner, Beth

Correspondence: The DEIS is greatly lacking in detail around carbon emissions, undeniably the problem of our time. It would be irresponsible of the NPS to not measure the impact and benefits of cattle and Tule elk simultaneously. The DEIS should, at a minimum, require existing ranches to meet new grazing practices, and reduce the number in their herds. At the same time, it seems some independent studies have shown that the grazing practices of the Tule elk achieve the same carbon sequestration benefits as grazing cattle and if carbon is the primary unit of measure for this decision, as the science community indicates it should be, then the NPS is missing data.

There is no comparative analysis indicating that the ultimate ecological health of the region (and indeed the broader atmosphere) would benefit from allowing the cattle to remain in its current numbers. The elk eat less, weigh less, yet stimulate grass growing in sufficient amounts that may more than offset their methane emissions (perhaps be a net-carbon sink/store). To this end, the carbon math may show that consistently keeping more elk than cattle would allow both to co-exist. Again, without an analysis, one that allows for some dairy cows to remain to support local businesses, NPS will be making a decision based solely on short-term economic (or political) interests and not the entire carbon cycle. NPS should include this analysis in the next DEIS.

A second argument for supporting the elk is around natural capital, the economic benefits of ecosystem services, well established by Stanford professor Gretchen Daily ([www.naturalcapitalproject.org](http://www.naturalcapitalproject.org)). Professor Daily should be contacted and her services retained as part of the next report. From her academic website: "Daily's scientific research is on countryside biogeography and the future dynamics of biodiversity change; on the scope for harmonizing biodiversity conservation and agriculture; on quantifying the production and value of ecosystem services across landscapes; and on new policy and finance mechanisms for integrating conservation and human development in major decisions."

Finally, there is the sheer cruelty of not allowing a free-roaming species like elk to migrate to water. If cattle ranches remain, then free and safe passage to natural water sources must be part of the new plan. This would mean granting nature-based easements across existing ranch land. To learn more about nature corridors, see WWF's Freedom to Roam: <https://www.worldwildlife.org/projects/freedom-to-roam>

To be sure, the outcome of this policy will receive national attention given new carbon emission targets.

Thank you, Beth Rattner

#5465

Name: N/A, N/A

Correspondence: I'm writing to support the public access and bicycling improvements outlined under Alternatives B, C, D, E, and F. I strongly support proposals that would lead to the planning and implementation of bicycling routes on trails, ranch roads, and pathways throughout the planning area, including but not limited to: 1) a connection between Devil's Gulch and Platform Bridge Road using existing ranch roads, 2) a connection between Bolinas Ridge Trail at Olema Hill and Point Reyes Station to serve as an interim connection for the Cross Marin Trail, 3) a connection between Bolinas Ridge Trail and Five Brooks Stables using existing ranch roads 4) a connection between Drakes Estero and Abbotts Lagoon Trail using existing ranch roads, 5) a connection between Marshall Beach Trailhead and Pierce Point Road using existing ranch roads, and 6) an Estero Trail loop using existing ranch roads. I encourage NPS to collaborate with ranchers and other stakeholders to educate the public and address concerns related to public access on working ranch lands.

The improvements outlined above would enable and encourage me to visit the Seashore more regularly-and by bike, rather than car. I would feel much safer riding in the Seashore and surrounding areas on trails, pathways, and ranch roads, rather than on roads shared with fast-moving vehicular traffic. Bicycling opportunities are currently very limited and fragmented, so any improvements in connectivity and the creation of new loop options would enable me to enjoy more of the Seashore and surrounding areas by bike.

#5466

Name: Lindstrom, W

Correspondence: I oppose the National Park Service's plan to kill native tule elk and expand commercial agriculture in Point Reyes National Seashore and Golden Gate National Recreation Area. It is way past time to revert the properties back to the era before dairy and cattle ranching. More and more people are changing up their diets to plant-based meals, becoming vegetarians, and healthier eating habits. These commercial cattle ranches have serious negative environmental impacts on the park, they pollute the waterways, causing soil erosion, and harming the many endangered and threatened animals who live on Point Reyes. National parks exist to protect our natural resources and native wildlife. This park should be managed accordingly.

#5467

Name: lucas, debbie

Correspondence: Please protect the iconic Tule Elk of Point Reyes Seashore.

#5468

Name: John, Nathan

Correspondence: Hello,

I am writing today to express my strong support for "Alternative F" as outlined within the General Management Plan Amendment Draft Environmental Impact Statement for Point Reyes National Seashore and the North District of Golden Gate National Recreation Area. Barring "Alternative F", my secondary preference is for "Alternative E".

I am deeply opposed to any and all of the alternatives that contemplate reduction, lethal management, or removal of any existing or new Tule Elk herds within the area under consideration.

The reason for my position is simple: I am considering the questions under consideration within the current EIS within the broader land use and ecological context of the greater Bay Area.

It is undeniable that:

A) There currently exist many ranchlands of comparable quality and character to those found within the NPS-controlled lands under discussion within this EIS; B) The amount of ranching activity occurring on the NPS-controlled lands under consideration is fairly modest (i.e. impacts to ranching on these lands do not negatively impact the people or economy of the region as a whole); and C) That the current Tule Elk population is at roughly 1% of its pre-colonial levels; that therefore D) Opportunities for Californians to observe Tule Elk are extremely limited; and most importantly that E) Tule Elk are a significant missing link in the deeply damaged ecology of California's coastal ecosystems

Given the above, it seems unconscionable that Tule Elk populations should be either numerically reduced, or made more difficult to observe, within the approximately 30,000 acres of NPS-controlled land under discussion on behalf of a land use (ranching) which by most estimates occupies almost 40,000,000 acres of land in the state of California.

While I applaud the National Park Service's ethos of historical preservation, and their efforts to model the harmonious integration of human and natural use, it seems clear that in this case the needs of the very fragile Tule Elk population should be put before the needs of any individual or particular members of a group (ranchers) that is, on the whole, over-dominant within the larger framework of Californian land use.

Instead, the NPS should take this opportunity to send a clear message that it prioritizes the re-wilding of the public lands under its control, and the rehabilitation of species and ecosystems damaged by human activities.

The Alternatives that serve the broad public interest to the greatest degree are in this case those which expand access to (and the health of) a scant natural resource (Tule Elk) - that is to say Alternative F, or less-so, Alternative E - though this may cause some amount of economic distress to the particular ranchers whose operations occur within the EIS area.

Thank you for your attention to this matter; I sincerely hope that your group will take action to protect the continued re-habilitation of one of California's many unique native species.

Yours,

Nathan John

#5469

Name: Cobb, Margaret

Correspondence: PLEASE Save the ELK!!!!!!!!!!!!

#5470

Name: Richardson, Jennifer

Correspondence: I care about protecting California's wildlife. I oppose the National Park Service's plan to kill native tule elk and expand commercial agriculture in Point Reyes National Seashore and Golden Gate National Recreation Area. I urge the National Park Service to instead restore the lands for wild animal habitat.

We should prioritize the preservation of our public lands and wildlife, not the economic interests of private ranchers. These commercial cattle ranches have serious negative environmental impacts on the park - polluting waterways, causing soil erosion, and harming the many endangered and threatened animals who live on Point Reyes. National parks exist to protect our natural resources and native wildlife. This park should be managed accordingly.

#5471

Name: Sharp, Jennifer

Correspondence: As a member of the California-based international animal protection nonprofit organization In Defense of Animals with over 250,000 supporters, I oppose the National Park Service plan to kill native Tule elk, grow commercial crops, and permit ranchers to add chickens, turkeys, sheep, pigs, and goats to their exploitative operations.

As national park land, this property was specifically set aside to protect, restore, and preserve the natural environment including the wild animals who live there. The original intention was to phase out dairy and cattle ranching, not add more crops or animals to increase ranching profits.

The proposed plan does not address the damage from grazing, including water-quality degradation and soil erosion. Also, adding new crops will create more conflicts with native wild animals.

Please abandon this inhumane and destructive plan. I urge you to restore the Seashore's Pastoral Zone for wild animal habitat and re-purpose historic ranch buildings for scientific research, interpretation, and public education.

#5472

Name: Curtis, Hazel

Correspondence: Please Stop killing Tule Elk in national park to make way for livestock. This is ruthless and reckless especially, at a time when nature should be protected and preserved. These wild life ungulates are natural threads in ecosystem and national parks are meant to be safe havens for their preservation and continuance of life, not tampering and destroying it for give aways to ranchers who already minopolise. 70% of wild lufe habitat. Please leave them to live out their lives as they ought not squeeze them out to take away their only home and kill them to stock freezers. This is very distressing and disturbing.

#5473

Name: gallagher, shane

Correspondence: Hello,

I grew up in San Francisco and having spent a lot of time at Point Reyes I think the ONLY thing the NPS should be doing is trying to reduce the impact of or completely remove any ranching from the seashore. To consider increasing it is obviously the most shameful thing to do. It is truly an embarrassment what the NPS has become under the current administration. Do the right thing for the majority of people not the few ranchers.

-Shane

#5474

Name: Simon, Hiliary

Correspondence: As a member of the California-based international animal protection nonprofit organization In Defense of Animals with over 250,000 supporters, I oppose the National Park Service plan to kill native Tule elk, grow commercial crops, and permit ranchers to add chickens, turkeys, sheep, pigs, and goats to their exploitative operations.

As national park land, this property was specifically set aside to protect, restore, and preserve the natural environment including the wild animals who live there. The original intention was to phase out dairy and cattle ranching, not add more crops or animals to increase ranching profits.

The proposed plan does not address the damage from grazing, including water-quality degradation and soil erosion. Also, adding new crops will create more conflicts with native wild animals.

Please abandon this inhumane and destructive plan. I urge you to restore the Seashore's Pastoral Zone for wild animal habitat and repurpose historic ranch buildings for scientific research, interpretation, and public education.

#5475

Name: N/A, N/A

Correspondence: Please preserve one of the most beautiful places on the planet and prioritize wildlife over ranching domestic cattle.

#5476

Name: N/A, N/A

Correspondence: The introduction of domestic animals other than cattle to Point Reyes National seashore, as well as monoculture farming of crops such as artichoke will have major detrimental impacts to the ecosystems in the park. As Point Reyes currently sits, it is one of the best places to photograph badgers, bobcats and coyotes in all of the western United States. The farming of small domestic animals such as goats, chickens and pigs will cause immediate conflict with the native carnivores, as the domestic animals will be predated and the ranchers will likely terminate the native predators using depredation permits. Monocultures of any variety will also be detrimental to the Point Reyes ecosystems, as monoculture crops tend to decrease biodiversity at all levels in the ecosystem. Any large scale use of pesticides will be detrimental to the endangered Red-legged frogs, and even organic fertilizers and pesticides can have negative impacts on amphibians. It is in the best interest of the park and the general public to preserve Point Reyes in its present state, as there are very few places left in California where native wildlife still flourishes.

#5477

Name: Binnie, Stanley

Correspondence: My wife and I have visited Point Reyes National Seashore several times. Our most recent visit was in March of this year (2019) where we participated in a NPS sponsored invasive plant (ice plant) removal project. Our previous visit was some 6 years ago. Since our visit 6 years ago and the visit in March of this year we noticed several changes to the park. We hiked the Drakes Bay trail which we had done previously and observed that the fencing in several places had been changed. The most obvious was the damage done to the shoreline of a pond adjacent to the trail. On our previous hike the shoreline of the pond was heavily vegetated and we saw otters swimming in the pond. On our most recent hike fencing had been installed along the shoreline of the pond forcing cattle to walk along the shoreline and the result was the shoreline vegetation had been completely destroyed and there were no otters in the pond. The new fencing forced the cattle to walk along the narrow strip between the fence and the pond shore and it was obvious that the cattle were defecating directly into the pond or near enough to the pond that runoff during rainy periods polluted the pond. In addition there was a lot of erosion along the fence uphill from the pond resulting in heavily rutted ground resulting in lots of soil runoff into the pond. It was apparent that the cattle were doing lots of damage. We also noted that several ponds appeared to contain lots of algae growth likely caused by the high nitrogen levels as a result of cattle manure getting into the water.

We also noted that many of the farmsteads had a run-down appearance. It seemed apparent that there was little if any concern about how this affected the aesthetics of the park. It seems to be increasingly clear that there is a lack of concern about the native vegetation and wildlife of the park on the part of the ranchers. As this seems to be an incompatible situation, I prefer option F-resulting in phasing out of ranching activities within Point Reyes National Seashore.

#5478

Name: N/A, N/A

Correspondence: I'm writing to support the public access and bicycling improvements outlined under Alternatives B, C, D, E, and F. I strongly support proposals that would lead to the planning and implementation of bicycling routes on trails, ranch roads, and pathways throughout the planning area, including but not limited to: 1) a connection between Devil's Gulch and Platform Bridge Road using existing ranch roads, 2) a connection between Bolinas Ridge Trail at Olema Hill and Point Reyes Station to serve as an interim connection for the Cross Marin Trail, 3) a connection between Bolinas Ridge Trail and Five Brooks Stables using existing ranch roads 4) a connection between Drakes Estero and Abbotts Lagoon Trail using existing ranch roads, 5) a connection between Marshall Beach Trailhead and Pierce Point Road using existing ranch roads, and 6) an Estero Trail loop using existing ranch roads. I encourage NPS to collaborate with ranchers and other stakeholders to educate the public and address concerns related to public access on working ranch lands.

The improvements outlined above would enable and encourage me to visit the Seashore more regularly-and by bike, rather than car. I would feel much safer riding in the Seashore and surrounding areas on trails, pathways, and ranch roads, rather than on roads shared with fast-moving vehicular traffic. Bicycling opportunities are currently very limited and fragmented, so any improvements in connectivity and the creation of new loop options would enable me to enjoy more of the Seashore and surrounding areas by bike.

#5479

Name: Sears, Geoffrey

Correspondence: I and my family are avid cyclists and hikers and love the Pt Reyes area. We back any additional access you can make for pedestrians and cyclists.

#5480

Name: Thandi, Kirpal

Correspondence: Please adopt Alternative F, which would discontinue farming and ranching opportunities in the park and expand visitor opportunities. The NPS needs to know that the preservation of native wild species must take precedence over farming and ranching activities. Grazing negatively affects ecosystems, causing water pollution and soil erosion, spreading invasive species and disease, and harming endangered species.

#5481

Name: Perry, Andrew

Correspondence: I'm writing to support the public access and bicycling improvements outlined under Alternatives B, C, D, E, and F. I strongly support proposals that would lead to the planning and implementation of bicycling routes on trails, ranch roads, and pathways throughout the planning area, including but not limited to: 1) a connection between Devil's Gulch and Platform Bridge Road using existing ranch roads, 2) a connection between Bolinas Ridge Trail at Olema Hill and Point Reyes Station to serve as an interim connection for the Cross Marin Trail, 3) a connection between Bolinas Ridge Trail and Five Brooks Stables using existing ranch roads 4) a connection between Drakes Estero and Abbotts Lagoon Trail using existing ranch roads, 5) a connection between Marshall Beach Trailhead and Pierce Point Road using existing ranch roads, and 6) an Estero Trail loop using existing ranch roads. I encourage NPS to collaborate with ranchers and other stakeholders to educate the public and address concerns related to public access on working ranch lands.

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#5482

Name: Daigle, Douglas

Correspondence: Dear NPS and PRNS -

I'm writing to support the public access and bicycling improvements outlined under Alternatives B, C, D, E, and F. I strongly support proposals that would lead to the planning and implementation of bicycling routes on trails, ranch roads, and pathways throughout the planning area, including but not limited to: 1) a connection between Devil's Gulch and Platform Bridge Road using existing ranch roads, 2) a connection between Bolinas Ridge Trail at Olema Hill and Point Reyes Station to serve as an interim connection for the Cross Marin Trail, 3) a connection between Bolinas Ridge Trail and Five Brooks Stables using existing ranch roads 4) a connection between Drakes Estero and Abbotts Lagoon Trail using existing ranch roads, 5) a connection between Marshall Beach Trailhead and Pierce Point Road using existing ranch roads, and 6) an Estero Trail loop using existing ranch roads. I

encourage NPS to collaborate with ranchers and other stakeholders to educate the public and address concerns related to public access on working ranch lands.

The improvements outlined above would enable and encourage me to visit the Seashore more regularly-and by bike, rather than car. I would feel much safer riding in the Seashore and surrounding areas on trails, pathways, and ranch roads, rather than on roads shared with fast-moving vehicular traffic. Bicycling opportunities are currently very limited and fragmented, so any improvements in connectivity and the creation of new loop options would enable me to enjoy more of the Seashore and surrounding areas by bike.

Thanks for your time and consideration,

Doug

#5483

Name: Tilley, Kimberly

Correspondence: I oppose the National Park Service plan to kill native Tule elk, grow commercial crops, and permit ranchers to add chickens, turkeys, sheep, pigs, and goats to their exploitative operations.

As national park land, this property was specifically set aside to protect, restore, and preserve the natural environment including the wild animals who live there. The original intention was to phase out dairy and cattle ranching, not add more crops or animals to increase ranching profits.

The proposed plan does not address the damage from grazing, including water-quality degradation and soil erosion. Also, adding new farmed animals and crops will create more conflicts with native wild animals and erode and pollute the land.

Please abandon this inhumane and destructive plan. I urge you to restore the Seashore's Pastoral Zone for wild animal habitat.

#5484

Name: quann, matt

Correspondence: Hi,

I love Pt. Reyes, but don't ride my bicycle there too often because most of the riding is on roads and without loops or connections. I prefer to ride on trails or dirt roads away from cars. I'd also like to be able to take my kids on rides there without worrying about cars. Having connections to allow loops away from busy traffic would be great!

Thanks for your stewardship.

#5485

Name: Shelton, Matt

Correspondence: I'm writing to support the public access and bicycling improvements outlined under Alternatives B, C, D, E, and F. I strongly support proposals that would lead to the planning and implementation of bicycling routes on trails, ranch roads, and pathways throughout the planning area, including but not limited to: 1) a connection between Devil's Gulch and Platform Bridge Road using existing ranch roads, 2) a connection between Bolinas Ridge Trail at Olema Hill and Point Reyes Station to serve as an interim connection for the Cross Marin Trail, 3) a connection between Bolinas Ridge Trail and Five Brooks Stables using existing ranch roads 4) a



connection between Drakes Estero and Abbotts Lagoon Trail using existing ranch roads, 5) a connection between Marshall Beach Trailhead and Pierce Point Road using existing ranch roads, and 6) an Estero Trail loop using existing ranch roads. I encourage NPS to collaborate with ranchers and other stakeholders to educate the public and address concerns related to public access on working ranch lands. The improvements outlined above would enable and encourage me to visit the Seashore more regularly-and by bike, rather than car. I would feel much safer riding in the Seashore and surrounding areas on trails, pathways, and ranch roads, rather than on roads shared with fast-moving vehicular traffic. Bicycling opportunities are currently very limited and fragmented, so any improvements in connectivity and the creation of new loop options would enable me to enjoy more of the Seashore and surrounding areas by bike.

#5486

Name: Haag, Lance

Correspondence: I ride a bike in the park about 20 times per year, mainly in SF Drake and Bear Valley roads. Lack of shoulder and signage or enforcement of 3 foot rule makes things difficult and leads me to mostly avoid riding farther into the park. Specifically:

I'm writing to support the public access and bicycling improvements outlined under Alternatives B, C, D, E, and F. I strongly support proposals that would lead to the planning and implementation of bicycling routes on trails, ranch roads, and pathways throughout the planning area, including but not limited to: 1) a connection between Devil's Gulch and Platform Bridge Road using existing ranch roads, 2) a connection between Bolinas Ridge Trail at Olema Hill and Point Reyes Station to serve as an interim connection for the Cross Marin Trail, 3) a connection between Bolinas Ridge Trail and Five Brooks Stables using existing ranch roads 4) a connection between Drakes Estero and Abbotts Lagoon Trail using existing ranch roads, 5) a connection between Marshall Beach Trailhead and Pierce Point Road using existing ranch roads, and 6) an Estero Trail loop using existing ranch roads. I encourage NPS to collaborate with ranchers and other stakeholders to educate the public and address concerns related to public access on working ranch lands.

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#5487

Name: Evatz, Richard

Correspondence: I'm writing to support the public access and bicycling improvements outlined under Alternatives B, C, D, E, and F. I strongly support proposals that would lead to the planning and implementation of bicycling routes on trails, ranch roads, and pathways throughout the planning area, including but not limited to: 1) a connection between Devil's Gulch and Platform Bridge Road using existing ranch roads, 2) a connection between Bolinas Ridge Trail at Olema Hill and Point Reyes Station to serve as an interim connection for the Cross Marin Trail, 3) a connection between Bolinas Ridge Trail and Five Brooks Stables using existing ranch roads 4) a connection between Drakes Estero and Abbotts Lagoon Trail using existing ranch roads, 5) a connection between Marshall Beach Trailhead and Pierce Point Road using existing ranch roads, and 6) an Estero Trail loop using existing ranch roads. I encourage NPS to collaborate with ranchers and other stakeholders to educate the public and address concerns related to public access on working ranch lands.

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#5488

Name: Hauswald, Vanessa

Correspondence: Dear NPS,

Thank you for taking the time to review our community's input on the proposed expanded access to our beloved Point Reyes National Seashore. As an avid, local cyclist and hiker, I am thrilled at the opportunity to access more of Pt. Reyes by bicycle, as I currently find the road to be less and less hospitable to cyclists. I am also part of a large cycling community, and the majority of them are choosing to ride on the road less and less due to the ubiquity of distracted drivers. Having more cycling access to off-road options is a dream that I believe you can make a reality.

I would specifically like to voice my strong support for opening bicycling routes on trails, ranch roads, and pathways throughout the planning area, including but not limited to: 1) a connection between Devil's Gulch and Platform Bridge Road using existing ranch roads, 2) a connection between Bolinas Ridge Trail at Olema Hill and Point Reyes Station to serve as an interim connection for the Cross Marin Trail, 3) a connection between Bolinas Ridge Trail and Five Brooks Stables using existing ranch roads 4) a connection between Drakes Estero and Abbotts Lagoon Trail using existing ranch roads, 5) a connection between Marshall Beach Trailhead and Pierce Point Road using existing ranch roads, and 6) an Estero Trail loop using existing ranch roads. I encourage NPS to collaborate with ranchers and other stakeholders to educate the public and address concerns related to public access on working ranch lands.

Thank you for your consideration of the needs, wants, and safety of the cyclists in your community and beyond.  
Sincerely, Vanessa Hauswald

#5489

Name: Jessen, Thomas

Correspondence: I'm writing to support the public access and bicycling improvements outlined under Alternatives B, C, D, E, and F. I strongly support proposals that would lead to the planning and implementation of bicycling routes on trails, ranch roads, and pathways throughout the planning area, including but not limited to: 1) a connection between Devil's Gulch and Platform Bridge Road using existing ranch roads, 2) a connection between Bolinas Ridge Trail at Olema Hill and Point Reyes Station to serve as an interim connection for the Cross Marin Trail, 3) a connection between Bolinas Ridge Trail and Five Brooks Stables using existing ranch roads 4) a connection between Drakes Estero and Abbotts Lagoon Trail using existing ranch roads, 5) a connection between Marshall Beach Trailhead and Pierce Point Road using existing ranch roads, and 6) an Estero Trail loop using existing ranch roads. I encourage NPS to collaborate with ranchers and other stakeholders to educate the public and address concerns related to public access on working ranch lands.

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#5490

Name: Polick, Melissa

Correspondence: I am a Tax Payer In Marin County CA, and have been fo4 26 years. First, RECORD the Fact that I am 100% Against any Culling of Our Wild Elk in the Point Reyes Area, i.e. Point Reyes National Seashore. I am Against ANY killing of Elk in this area. In fact, We should significantly Reduce Farmland for Cows and Allow a NATURAL Environment again in this area. REMINDER: Cattle are Not wild. We cn live without them. We need to PROTECT Our Elk and never think about purposely killing them for a cow to graze. That is Outrageous! Also, I don't want farmers to be Allowed, ever, to "Diversify" by bringing in more sheep, goats, pigs, and chicken. NO!!!

The TRUE Intent of Point Reyes National Seashore is to PRESERVE the Natural seashore - -- Period! Again, NO Killing of ANY of OUR Elk!!! Not, ever!!!

#5491

Name: Melbosted, William

Correspondence: I'm writing to support the public access and bicycling improvements outlined under Alternatives B, C, D, E, and F. I strongly support proposals that would lead to the planning and implementation of bicycling routes on trails, ranch roads, and pathways throughout the planning area, including but not limited to: 1) a connection between Devil's Gulch and Platform Bridge Road using existing ranch roads, 2) a connection between Bolinas Ridge Trail at Olema Hill and Point Reyes Station to serve as an interim connection for the Cross Marin Trail, 3) a connection between Bolinas Ridge Trail and Five Brooks Stables using existing ranch roads 4) a connection between Drakes Estero and Abbotts Lagoon Trail using existing ranch roads, 5) a connection between Marshall Beach Trailhead and Pierce Point Road using existing ranch roads, and 6) an Estero Trail loop using existing ranch roads. I encourage NPS to collaborate with ranchers and other stakeholders to educate the public and address concerns related to public access on working ranch lands.

The improvements outlined above would enable and encourage me to visit the Seashore more regularly-and by bike, rather than car. I would feel much safer riding in the Seashore and surrounding areas on trails, pathways, and ranch roads, rather than on roads shared with fast-moving vehicular traffic. Bicycling opportunities are currently very limited and fragmented, so any improvements in connectivity and the creation of new loop options would enable me to enjoy more of the Seashore and surrounding areas by bike.

#5492

Name: Reynolds, Dan

Correspondence: Please allow bikes in point Reyes. Thank you

#5493

Name: Barbour, Frances

Correspondence: I'm writing to support the public access and bicycling improvements outlined under Alternatives B, C, D, E, and F. I strongly support proposals that would lead to the planning and implementation of bicycling routes on trails, ranch roads, and pathways throughout the planning area, including but not limited to: 1) a connection between Devil's Gulch and Platform Bridge Road using existing ranch roads, 2) a connection between Bolinas Ridge Trail at Olema Hill and Point Reyes Station to serve as an interim connection for the Cross Marin Trail, 3) a connection between Bolinas Ridge Trail and Five Brooks Stables using existing ranch roads 4) a connection between Drakes Estero and Abbotts Lagoon Trail using existing ranch roads, 5) a connection between Marshall Beach Trailhead and Pierce Point Road using existing ranch roads, and 6) an Estero Trail loop using existing ranch roads. I encourage NPS to collaborate with ranchers and other stakeholders to educate the public and address concerns related to public access on working ranch lands.

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#5494

Name: Hood, Valeri

Correspondence: As a hiker, in my late 60's I find that the bike 'culture' is out of hand. Our open spaces have been marketed/targeted to the tourism industry- and out of town, out of state, out of country bikers head here in

hordes. There is no ranger or police presence in the watershed. As my husband and I travel throughout the country, we are seeing this situation on the increase everywhere we go. People don't follow even the basic common courtesies: not slowing down when approaching pedestrians, illegally riding after hours, riding on single track, pedestrian only trails all over our county. Animals have very little area left to them- major wildlife corridors are disrupted by cars, bikes, people and increasingly, illegally ridden e-bikes and scooters. People also run their dogs along with their bikes, and pedestrians do not obey leash laws.

We also face extreme fire danger- across the country - -the more people in back country, the more risk- both of fire and the further complication and/or impossibility of evacuation. Imagine what would happen on any weekend if there was a fire and mass evacuation? There would be NO WAY bikes could exit- NO WAY fire trucks could manouever on the roads. We are already in a super dangerous position. No one claims that we have an emergency evacuation plan- there isn't one.

In our town of Fairfax, we are already maxed out in neighborhood parking, yet the cars with bikes keep coming in increasing numbers. The weekends are a gridlock- from San Anselmo, through Fairfax- up to Mount Tamalpais and out to west Marin. There is absolute gridlock every weekend on the road to Stinson. The traffic is becoming increasingly perilous on our emergency evacuation routes- Sir Francis Drake Blvd. and the Bolinas Fairfax Road. What is the emergency evacuation plan for any of our parklands?

Our local rangers have been decreased in number- cut in half. With no new rangers or any kind of enforcement, there is a push to increase the number of bikes. This makes no sense.

Please follow common sense policy. More rangers now-fire safety measures- - that's where the money should be spent- - fewer bikes, enforce leash laws- allow the wild animals declining in numbers, to have some place where they are not totally inundated with people yelling, running, biking and off leash dogs.

Bikes degrade trails. There are no laws enforced for bike riders. Our lands must not buckle to demands of this new lobby.

We are losing what was so precious- sense of place, sense of space, sense of quiet. And Common sense.

Respectfully yours,

Valeri Hood and Bert Bartsch

#5495

Name: Fiandaca, Anastasia

Correspondence: I'm writing today in support of public access and bicycling improvements outlined under Alternatives B, C, D, E, and F. I strongly support proposals that would lead to the planning and implementation of bicycling routes on trails, ranch roads, and pathways throughout the planning area, including but not limited to: 1) a connection between Devil's Gulch and Platform Bridge Road using existing ranch roads, 2) a connection between Bolinas Ridge Trail at Olema Hill and Point Reyes Station to serve as an interim connection for the Cross Marin Trail, 3) a connection between Bolinas Ridge Trail and Five Brooks Stables using existing ranch roads 4) a connection between Drakes Estero and Abbotts Lagoon Trail using existing ranch roads, 5) a connection between Marshall Beach Trailhead and Pierce Point Road using existing ranch roads, and 6) an Estero Trail loop using existing ranch roads. I encourage NPS to collaborate with ranchers and other stakeholders to educate the public and address concerns related to public access on working ranch lands.

The improvements outlined above would enable and encourage me to visit the Seashore more regularly- -and by bike, rather than car. Currently, I have not even attempted to cycle on the Seashore roads due to fear of cycling next to fast moving vehicular traffic. I would feel much, much safer cycling on trails, pathways, and ranch roads.

Bicycling opportunities are currently very limited and fragmented, so any improvements in connectivity and the creation of new loop options would enable me to enjoy more of the Seashore and surrounding areas by bike.

#5496

Name: Buchanan, Kathleen

Correspondence: Don't lease out more land than the wildlife can live on. I can't believe you are leasing out public lands. These lands belong to all the people and don't need to be shut out of public lands. Ranchers should have to buy their own feed for their livestock. Since they graze they can charge more for their product. It should be up to the American people to allow this to be done.

#5497

Name: church, j

Correspondence: Greetings.I'm writing to support the public access and bicycling improvements outlined under Alternatives B, C, D, E, and F. I strongly support proposals that would lead to the planning and implementation of bicycling routes on trails, ranch roads, and pathways throughout the planning area, including but not limited to: 1) a connection between Devil's Gulch and Platform Bridge Road using existing ranch roads, 2) a connection between Bolinas Ridge Trail at Olema Hill and Point Reyes Station to serve as an interim connection for the Cross Marin Trail, 3) a connection between Bolinas Ridge Trail and Five Brooks Stables using existing ranch roads 4) a connection between Drakes Estero and Abbotts Lagoon Trail using existing ranch roads, 5) a connection between Marshall Beach Trailhead and Pierce Point Road using existing ranch roads, and 6) an Estero Trail loop using existing ranch roads. I encourage NPS to collaborate with ranchers and other stakeholders to educate the public and address concerns related to public access on working ranch lands.

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#5498

Name: Zaitlin, J.A.

Correspondence: I wish to support the "no ranching" alternative. Ranching operations pollute the water with cow manure. I understand that 133 million pounds of cow manure is produced annually by ranches managed by PRNS. This activity does not belong in a national seashore.

The seashore was purchased for the public with the expressed intent of preserving to the maximum extent its natural state, not commercial operations that result in water pollution and habitat destruction.

#5499

Name: Jacobson, Edward

Correspondence: Beef production, with best practices grazing rotation, can probably be made compatible with healthy grasslands at Pt. Reyes. It is hard to imagine that dairy farming has been or can be. In any event, the existing elk herd(s) should be maintained, with lethal removal, when necessary, provided by citizen hunters who apply in a lottery and hunt managed by the California Department of Fish and Wildlife in conjunction with the National Park Service. NPS knows how to do this from its management of big game hunting on National Parks and Preserves in various states.

From the EIS: " Impacts on the Drakes Beach herd would be significant because it would no longer exist. Overall viability of the tule elk population in Point Reyes or in California would not be affected; however, removal of a

native species for ranching considerations would be unprecedented in the national park system and would be inconsistent with state management of elk on ranchlands outside the park. Under alternative D, cessation of ranching on 7,500 acres would have beneficial impacts on elk by removing existing fencing, reducing hazing, and providing additional grazing opportunities compared to existing conditions. Alternative E would reduce impacts from hazing. Alternative F would eliminate impacts on elk related to hazing and fencing and would allow for the free-range population to expand across the planning area"

#5500

Name: Rennacker , Ann

Correspondence: Save the Tule Elk and do not allow cattle to dominate the environment in this area!

#5501

Name: Fedorov, Karen

Correspondence: As a member of the California-based international animal protection nonprofit organization In Defense of Animals with over 250,000 supporters, I oppose the National Park Service plan to kill native Tule elk, grow commercial crops, and permit ranchers to add chickens, turkeys, sheep, pigs, and goats to their exploitative operations.

As national park land, this property was specifically set aside to protect, restore, and preserve the natural environment including the wild animals who live there. The original intention was to phase out dairy and cattle ranching, not add more crops or animals to increase ranching profits. This is OUR land, not farmers and ranchers!!

The proposed plan does not address the damage from grazing, including water-quality degradation and soil erosion. Also, adding new crops will create more conflicts with native wild animals.

Please abandon this inhumane and destructive plan. I urge you to restore the Seashore's Pastoral Zone for wild animal habitat and repurpose historic ranch buildings for scientific research, interpretation, and public education.

#5502

Name: N/A, N/A

Correspondence: I feel it's idiotic and illogical to consider culling the Tule Elk. Their Success Story coming back from the brink of extinction is a representative of how humans can occasionally reverse some of the damage they have done to the flora and fauna of the world. And this is in the name of ranching? Cattle ranching is a huge industry, not only in Marin County, but all of California and much of the US, Canada, etc. We're not hurting our economy by letting these go. Giving them favor over the natural aspects of Pt. Reyes is counter intuitive to what a Nat'l Seashore (Park) is supposed to be. Yes, many focus on history, and Pt Reyes has lots of that, but it is an incredibly unique part of the planet in terms of NATURAL history. I feel it's time to become less anthropocentric and show some caring for this place and what it holds. I'm not saying to immediately get rid of the ranches, but DO consider phasing them out. Turn their infrastructure into educational facilities, or something to that effect.

Also note that in terms of history, there is very little representation of the Coast Miwok, who thrived there much longer than we have.

FYI, I'm a 61 year old male; been visiting the Park since I was 8: Elementary School field trips, Cub Scouts, Boy Scouts, personal visits, etc. Now I volunteer there. I started out as a Winter Wildlife Docent, then did some Harbor Seal Monitoring, two seasons of being a Tule Elk Docent and I now volunteer at Bear Valley as an Interpretive Ranger. At the same time, I returned to school to study the Natural Sciences. I love this place and care deeply for it, including the history. I've heard many arguments about the issue of Ranching vs. Elk, and no one's ever convinced me that the ranches need to be there, nor have I seen any reason to remove the elk.

Stop thinking about humans so much. Use your brains and rethink this - - Please! Leave the Tule Elk be. Be nice. Be kind.

#5503

Name: Capra, Dina

Correspondence: Good Day, I am verily opposed to permit elk to be killed while allowing the expansion of agricultural activities. Please be responsible stewards of our native wild life. Tule Elk at Point Reyes National Seashore should be protected. Thank you.

Sincerely, Dina Capra

#5504

Name: N/A, N/A

Correspondence: I am writing to urge the National Park Service to discontinue the grazing of beef and dairy cattle at Point Reyes National Seashore. This precious area has been damaged by livestock grazing which poses a threat to the environment and local wildlife and it should be protected and used to serve the public good, and not for the benefit of the livestock industry.

I strongly oppose Option B and any other proposal that would be fatal to Tule Elk or other wildlife to the benefit of ranching operations, and encourage the agency to adopt Option F to discontinue grazing and allow members of the public to enjoy this beautiful park and to be enriched with opportunities to visit and appreciate this special place.

#5505

Name: Birkie, Wolfe

Correspondence: I'm writing to support the public access and bicycling improvements outlined under Alternatives B, C, D, E, and F. I strongly support proposals that would lead to the planning and implementation of bicycling routes on trails, ranch roads, and pathways throughout the planning area, including but not limited to: 1) a connection between Devil's Gulch and Platform Bridge Road using existing ranch roads, 2) a connection between Bolinas Ridge Trail at Olema Hill and Point Reyes Station to serve as an interim connection for the Cross Marin Trail, 3) a connection between Bolinas Ridge Trail and Five Brooks Stables using existing ranch roads 4) a connection between Drakes Estero and Abbotts Lagoon Trail using existing ranch roads, 5) a connection between Marshall Beach Trailhead and Pierce Point Road using existing ranch roads, and 6) an Estero Trail loop using existing ranch roads. I encourage NPS to collaborate with ranchers and other stakeholders to educate the public and address concerns related to public access on working ranch lands.

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#5506

Name: Gardner, Michele

Correspondence: am writing to urge the National Park Service to discontinue the grazing of beef and dairy cattle at Point Reyes National Seashore. This precious area has been damaged by livestock grazing which poses a threat to the environment and local wildlife and it should be protected and used to serve the public good, and not for the benefit of the livestock industry.

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#5507

Name: Mathews , Linda

Correspondence: I am a native Californian and my family has been here for generations. Our beautiful mountains, beaches, forests and our incredible wildlife are precious. The Tule Elk are a treasure and it sickens me to think of them being killed. Cattle already graze on millions of acres of public land. Please don't give in to greed. Tourists and residents want to enjoy nature, not see it destroyed.

#5508

Name: N/A, N/A

Correspondence: i am writing out of concern for native Tule Elk. I have read of the plan to kill at least a part of the herd and find that unacceptable. They are a natural part of the landscape and nature and should be left alone

Ranchers have enough land already and do not need more. They take habitat from other wildlife so they can grease more cows and that causes har to other species as well as adding more pollution. It is well documented that ranching causes ethane which affects the environment. It is time to stop catering to ranchers and start thinking of the wildlife and their needs as well as the effects of ranching on climate change which is upon us and is already causing harm to put it mildly.

I hope that you will do the ethical and responsible thing for wildlife and the planet.

Thank you for your time..

#5509

Name: Bruland, Andrew

Correspondence: I am writing to urge the National Park Service to discontinue the grazing of beef and dairy cattle at Point Reyes National Seashore. This precious area has been damaged by livestock grazing which poses a threat to the environment and local wildlife and it should be protected and used to serve the public good, and not for the benefit of the livestock industry.

I strongly oppose Option B and any other proposal that would be fatal to Tule Elk or other wildlife to the benefit of ranching operations, and encourage the agency to adopt Option F to discontinue grazing and allow members of the public to enjoy this beautiful park and to be enriched with opportunities to visit and appreciate this special place.

#5510

Name: Wilke, Dana

Correspondence: I strongly oppose allowing cattle and ranchers to put their animals on OUR PUBLIC lands to graze and destroy the fragile ecosystem that currently exists. These are public lands meant for recreation use and not to be privatized or for individuals to benefit from the use of PUBLIC lands. Cattle and farming significantly degrade land, reduce habitats, and the land is not available to individual users like me. Point Reyes is an incredibly beautiful area with so many natural spaces to hike and enjoy and so many amazing creatures like elk, sea birds, and more. These animals are already facing habitat loss and a host of other problems because of climate change. The least we can do is let them live in their homes for as long as possible before climate change disrupts that. If you



allow farming on OUR lands all of that will go away and no one will want to visit a beautiful place that was once beautiful but is no more.

It's a National Park and the National Park mission statement reads, "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." You are not living up to that mission if you allow agricultural practices onto the land. No one will be inspired, you will have forever degraded the land so future generations can no longer enjoy that beauty that was once there. Please do not allow agricultural practices on the lands. You are essentially saying that those farmers are more important and so are the cattle than the public's enjoyment and use of the space as a natural space for the current generation and all generations to come. Look back to your mission statement and ask yourself - does this decision fit within the means of what the National Park Service is meant to do?

#5511

Name: Gomez, Daniel

Correspondence: Don't kill animals for cattle grazing!!

#5512

Name: Abright, Bill

Correspondence: Dear National Park Service, I'm writing to support the public access and bicycling improvements outlined under Alternatives B, C, D, E, and F. I strongly support proposals that would lead to the planning and implementation of bicycling routes on trails, ranch roads, and pathways throughout the planning area, including but not limited to: 1) a connection between Devil's Gulch and Platform Bridge Road using existing ranch roads, 2) a connection between Bolinas Ridge Trail at Olema Hill and Point Reyes Station to serve as an interim connection for the Cross Marin Trail, 3) a connection between Bolinas Ridge Trail and Five Brooks Stables using existing ranch roads 4) a connection between Drakes Estero and Abbotts Lagoon Trail using existing ranch roads, 5) a connection between Marshall Beach Trailhead and Pierce Point Road using existing ranch roads, and 6) an Estero Trail loop using existing ranch roads. I encourage NPS to collaborate with ranchers and other stakeholders to educate the public and address concerns related to public access on working ranch lands.

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Recently I have transitioned from a regular Mountain bike to a Class 1, E-bike. It has been game changer in providing access to the point Reyes National Seashore from San Anselmo to Pt. Reyes by bike. I hop[e you will wonder Class 1 E-bikes the same as bicycles and allow their access as such. Thanks, Bill Abright

#5513

Name: Beacock, Craig

Correspondence: I'm writing to support the public access and bicycling improvements outlined under Alternatives B, C, D, E, and F.

As a lifelong Marin county resident, and frequent user of the area with my family, we take great joy in experiencing our natural resources - both by car, on foot and by bike. Sadly, traveling by bicycle is the most challenging, and least safe method of enjoying the Pt. Reyes area due to a combination of lack of trail access, heavy auto traffic and narrow shoulders on most roads.

I strongly support proposals that would lead to the planning and implementation of bicycling routes on trails, ranch roads, and pathways throughout the planning area, including but not limited to: 1) a connection between Devil's Gulch and Platform Bridge Road using existing ranch roads, 2) a connection between Bolinas Ridge Trail at Olema Hill and Point Reyes Station to serve as an interim connection for the Cross Marin Trail, 3) a connection between Bolinas Ridge Trail and Five Brooks Stables using existing ranch roads 4) a connection between Drakes Estero and Abbotts Lagoon Trail using existing ranch roads, 5) a connection between Marshall Beach Trailhead and Pierce Point Road using existing ranch roads, and 6) an Estero Trail loop using existing ranch roads. I encourage NPS to collaborate with ranchers and other stakeholders to educate the public and address concerns related to public access on working ranch lands.

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#5513

Name: N/A, N/A

Correspondence: We need to maintain this land as protected wildlife land!!! Point Reyes is a national Seashore and has many protected species and should not be subject to human development through industrialized agriculture. Our limited "wild" areas need to be protected because destroying and replacing them with commercial land them will cause humans more harm than good.

#5514

Name: Hauswald, Yuri

Correspondence: I'm writing to support the public access and bicycling improvements outlined under Alternatives B, C, D, E, and F. I strongly support proposals that would lead to the planning and implementation of bicycling routes on trails, ranch roads, and pathways throughout the planning area, including but not limited to: 1) a connection between Devil's Gulch and Platform Bridge Road using existing ranch roads, 2) a connection between Bolinas Ridge Trail at Olema Hill and Point Reyes Station to serve as an interim connection for the Cross Marin Trail, 3) a connection between Bolinas Ridge Trail and Five Brooks Stables using existing ranch roads 4) a connection between Drakes Estero and Abbotts Lagoon Trail using existing ranch roads, 5) a connection between Marshall Beach Trailhead and Pierce Point Road using existing ranch roads, and 6) an Estero Trail loop using existing ranch roads. I encourage NPS to collaborate with ranchers and other stakeholders to educate the public and address concerns related to public access on working ranch lands.

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Thank you for listening

#5515

Name: Norris, Madeline

Correspondence: I appose plan B. It's time to protect our parks and the beauty they hold. This park provides many benefits for the community. I do not support the takeover of dairy farmers continuing to pollute the land and waters.

#5516

Name: N/A, N/A

Correspondence: I agree with the comments from wildlife scientists in that the elk population must continue to grow while cattle can live almost anywhere.

#5517

Name: Karas, Katie

Correspondence: Our country's taxpayer-funded National Parks should be a safe haven for the wildlife we share this beautiful land with. Leasing it to ranchers and killing elk and any other animals who inhabit it is a cruel act that enables more cruelty. The cattle are bred to die violently. "Farming" them is destroying the planet. Please protect the sanctity of our National Parks and let this industry fend for itself. We already prop it up way too much. Thank you.

#5518

Name: N/A, N/A

Correspondence: I am writing to urge the National Park Service to discontinue the grazing of beef and dairy cattle at Point Reyes National Seashore. This precious area has been damaged by livestock grazing which poses a threat to the environment and local wildlife and it should be protected and used to serve the public good, and not for the benefit of the livestock industry.

I strongly oppose Option B and any other proposal that would be fatal to Tule Elk or other wildlife to the benefit of ranching operations, and encourage the agency to adopt Option F to discontinue grazing and allow members of the public to enjoy this beautiful park and to be enriched with opportunities to visit and appreciate this special place.

#5519

Name: martin, theresa

Correspondence: I'm writing to support the public access and bicycling improvements outlined under Alternatives B, C, D, E, and F. I strongly support proposals that would lead to the planning and implementation of bicycling routes on trails, ranch roads, and pathways throughout the planning area, including but not limited to: 1) a connection between Devil's Gulch and Platform Bridge Road using existing ranch roads, 2) a connection between Bolinas Ridge Trail at Olema Hill and Point Reyes Station to serve as an interim connection for the Cross Marin Trail, 3) a connection between Bolinas Ridge Trail and Five Brooks Stables using existing ranch roads 4) a connection between Drakes Estero and Abbotts Lagoon Trail using existing ranch roads, 5) a connection between Marshall Beach Trailhead and Pierce Point Road using existing ranch roads, and 6) an Estero Trail loop using existing ranch roads. I encourage NPS to collaborate with ranchers and other stakeholders to educate the public and address concerns related to public access on working ranch lands.

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#5520

Name: Hale, Margaret

Correspondence: Dear NPS: I am not an avid hiker but when my wine or hike group of women decides on the latter, we often head to the Estero Trail, at Pt. Reyes National Seashore. I have hiked there off and on for more than 20 years. It is a wonderful, very popular, trail in breathtaking country.

How distressing, then, to learn not just of the level of degradation this iconic national treasure has already suffered, but to also how much further compromised it might become if the National Park Service does not act in the best interests of the public and the parkland. In a time when elements in our national government are doggedly working to rollback environmental and public health protections, California must serve as a beacon for democratically and scientifically based decision-making - not special interests or those with the most power and money.

Please do not count me as a nuts-and-raisins tree hugger. I fully believe there can be a compromise - compromise being a solution that is greatly missing in our political and social worlds these days. But to think that the current situation should continue unabated, or that the true and original inhabitants of Pt. Reyes - the Tule Elk, found only at Pt. Reyes - might be culled or killed off to support or increase dairy and cattle farming does not fit with what has been long held to be the mission of our National Park Service. There is sufficient, indeed at times overwhelming, scientific evidence to show the damage Pt. Reyes has already suffered from overgrazing of cattle: loss of native species and the introduction of invasive species and, not least, damage and risk to sea life and ocean health.

In an ideal world, all ranching would simply be stopped, and the Tule Elk and other species allowed to reestablish themselves. But I understand this may not be feasible. Certainly, however, there can be reduced ranching, and dairy farms - the most destructive of all - phased out in reasonable but not lengthy times. When last I hiked the Estero Trail, my girlfriend and I were charged by a cow (protecting an unseen calf, assume) and had to pick our way through piles of fresh cow manure. We gave up before reaching Sunset Beach, where weve enjoyed many a picnic over the decades.

Please consider regular tax-paying folk like us, and our future generations, when you decide the future of this magnificent park.

Sincerely,

Margaret Ellen Hale

#5521

Name: Griffin, Joyce -Martin

Correspondence: Response to NPS update of EIS updating the Point Reyes National Seashore management plan to address cattle ranching impacts and grazing conflicts with native wildlife such as tule elk, & H.R.6687 - Jared Huffman, 115th Congress (2017-2018).

At Point Reyes National Seashore approximately 15 private ranching enterprises currently graze beef and dairy cattle on 24 lease units that make up more than 18,000 acres of the park's 71,000 acres.

Of the six alternatives, ABCDEF, only F is acceptable, which phases out cattle ranching in five years.

In this world undergoing accelerated convergence of environmental and technological movements more than ever people need the solace that only nature can give. And wild lands filled with native flora and fauna are even more necessary with our rapidly growing population, overcrowding, climate change, and job changes. Point Reyes National Seashore, which belongs to the public, was seen 60 years ago as a solution by local visionaries and politicians, who worked hard for an agreed upon deal to create a wild and natural seashore, while paying farmers and giving them 25 years to phase out their dairy and beef cattle farms, returning the land to nature.

Along the way, the vision was changed and deals were made to allow farmers to stay beyond their original paid contract. Now with serious threat of climate change and shift to technology, science tells us that growing dairy and beef cattle in a National Park is contrary to principal of National Parks, climate change and public health. "The livestock-polluted waters of Point Reyes National Seashore rank in the top 10 percent of U.S. locations most contaminated by feces indicated by E. coli bacteria, according to a new report published on the investigative journalism website The Revelator. 11/21/17 The livestock-polluted waters of Point Reyes National Seashore rank in the top 10 percent of U.S. locations most contaminated by feces indicated by E. coli bacteria, according to a new report published on the investigative journalism website The Revelator.11/21/17 If we rest on the history of ranching in PRNS we must first know the history of Miwok Native Americans, who lived and cherished the seashore of Point Reyes long before cattle ranching, and did so without pollution. They, like us, would like to see their presence honored, and allow the return of PRNS to its natural habitat.

PRNS cattle have become a public health issue. We cannot rest on our laurels and greed of romanticizing the history of decades of concentrated dairy farming and ranching to push forth the same worn ideas.

We must look at the science; and science tells us cattle ranching in concentrated form is a catastrophic burden to nature and high quality environmental health. We need all the natural nature we can get; and, we can return to the original national seashore park objective by holding the cattle ranchers to their original long-overdue contract. This is 2019 and we are in critical danger; PRNS is public lands and ranching is a private enterprise; they don't mix. Keeping large dairy and beef farmers in PRNS will not save us, or them; just say no.

#5522

Name: King, Steven

Correspondence: Native Elk over dairy & beef cattle ALL DAY LONG! The meat & dairy industry, arguably the most vile, repugnant "business model" in history has PLENTY of cows to abuse. Let these beautiful elk be!

#5523

Name: Van Zee, Ali

Correspondence: I care about protecting California's wildlife. I oppose the National Park Service's plan to kill native tule elk and expand commercial agriculture in Point Reyes National Seashore and Golden Gate National Recreation Area. I urge the National Park Service to instead restore the lands for wild animal habitat.

We should prioritize the preservation of our public lands and wildlife, not the economic interests of private ranchers. These commercial cattle ranches have serious negative environmental impacts on the park - polluting waterways, causing soil erosion, and harming the many endangered and threatened animals who live on Point Reyes. National parks exist to protect our natural resources and native wildlife. This park should be managed accordingly. Cattle have NO place on OUR lands!

#5524

Name: Ritchey, Jed

Correspondence: I'm writing to support the public access and bicycling improvements outlined under Alternatives B, C, D, E, and F. I strongly support proposals that would lead to the planning and implementation of bicycling routes on trails, ranch roads, and pathways throughout the planning area, including but not limited to: 1) a connection between Devil's Gulch and Platform Bridge Road using existing ranch roads, 2) a connection between Bolinas Ridge Trail at Olema Hill and Point Reyes Station to serve as an interim connection for the Cross Marin Trail, 3) a connection between Bolinas Ridge Trail and Five Brooks Stables using existing ranch roads 4) a connection between Drakes Estero and Abbotts Lagoon Trail using existing ranch roads, 5) a connection between Marshall Beach Trailhead and Pierce Point Road using existing ranch roads, and 6) an Estero Trail loop using existing ranch roads. I encourage NPS to collaborate with ranchers and other stakeholders to educate the public and address concerns related to public access on working ranch lands.

The improvements outlined above would enable and encourage me to visit the Seashore more regularly-and by bike, rather than car. I would feel much safer riding in the Seashore and surrounding areas on trails, pathways, and ranch roads, rather than on roads shared with fast-moving vehicular traffic. Bicycling opportunities are currently very limited and fragmented, so any improvements in connectivity and the creation of new loop options would enable me to enjoy more of the Seashore and surrounding areas by bike.

#5525

Name: Spycher, Pam

Correspondence: Dear National Park Service,

I am writing to urge the National Park Service to discontinue the grazing of beef and dairy cattle at Point Reyes National Seashore. This precious area has been damaged by livestock grazing which poses a threat to the environment and local wildlife and it should be protected and used to serve the public good, and not for the benefit of the livestock industry.

I strongly oppose Option B and any other proposal that would be fatal to Tule Elk or other wildlife to the benefit of ranching operations, and encourage the agency to adopt Option F to discontinue grazing and allow members of the public to enjoy this beautiful park and to be enriched with opportunities to visit and appreciate this special place.

Sincerely, Pam Spycher

#5526

Name: Wilkinson, Daniel

Correspondence: STOP KILLING NATIVE ANIMALS TO PROMOTE ENVIRONMENTAL DESTRUCTION AND GLOBAL WARMING!

#5527

Name: N/A, N/A

Correspondence: Protect the native Tulle Elk in Pt. Reyes.

#5528

Name: Azevedo, Tony

Correspondence: I am writing to urge the National Park Service to discontinue the grazing of beef and dairy cattle at Point Reyes National Seashore. This precious area has been damaged by livestock grazing which poses a threat to the environment and local wildlife and it should be protected and used to serve the public good, and not for the benefit of the livestock industry.

I strongly oppose Option B and any other proposal that would be fatal to Tule Elk or other wildlife to the benefit of ranching operations, and encourage the agency to adopt Option F to discontinue grazing and allow members of the public to enjoy this beautiful park and to be enriched with opportunities to visit and appreciate this special place.

#5529

Name: Garcia, Armando

Correspondence: I am writing to urge the National Park Service to discontinue the grazing of beef and dairy cattle at Point Reyes National Seashore. This precious area has been damaged by livestock grazing which poses a threat

to the environment and local wildlife and it should be protected and used to serve the public good, and not for the benefit of the livestock industry.

I strongly oppose Option B and any other proposal that would be fatal to Tule Elk or other wildlife to the benefit of ranching operations, and encourage the agency to adopt Option F to discontinue grazing and allow members of the public to enjoy this beautiful park and to be enriched with opportunities to visit and appreciate this special place.

Thank you very much for your time, consideration, and cooperation.

#5530

Name: winter, marie

Correspondence: I am writing to urge the National Park Service to discontinue the grazing of beef and dairy cattle at Point Reyes National Seashore. This precious area has been damaged by livestock grazing which poses a threat to the environment and local wildlife and it should be protected and used to serve the public good, and not for the benefit of the livestock industry.

I strongly oppose Option B and any other proposal that would be fatal to Tule Elk or other wildlife to the benefit of ranching operations, and encourage the agency to adopt Option F to discontinue grazing and allow members of the public to enjoy this beautiful park and to be enriched with opportunities to visit and appreciate this special place.

#5531

Name: Covert, Vicki

Correspondence: Do Not kill these animals. Cattle Grazing Is not Worth it. This Is not what people want. It's only for cattle ranchers profits. WRONG!

#5532

Name: Liroff, Willow

Correspondence: I'm horrified of the plan to destroy Point Reyes for use by our food industry. Our state treasure needs protection, especially vulnerable populations of elk, so please make sure not to devastate the wildlife depending on Point Reyes with this proposed plan!

#5533

Name: Murdoch, Sarah

Correspondence: Ptotect native wild life in Pt.Reyes

#5534

Name: N/A, N/A

Correspondence: I am writing to urge the National Park Service to discontinue the grazing of beef and dairy cattle at Point Reyes National Seashore. This precious area has been damaged by livestock grazing which poses a threat to the environment and local wildlife and it should be protected and used to serve the public good, and not for the benefit of the livestock industry.

I strongly oppose Option B and any other proposal that would be fatal to Tule Elk or other wildlife to the benefit of ranching operations, and encourage the agency to adopt Option F to discontinue grazing and allow members of

the public to enjoy this beautiful park and to be enriched with opportunities to visit and appreciate this special place.

#5535

Name: Alden, Roxanne

Correspondence: Thank you, Gene

#5536

Name: Thornhill, Robert

Correspondence: I am writing to urge the National Park Service to discontinue the grazing of beef and dairy cattle at Point Reyes National Seashore. This precious area has been damaged by livestock grazing which poses a threat to the environment and local wildlife and it should be protected and used to serve the public good, and not for the benefit of the livestock industry.

I strongly oppose Option B and any other proposal that would be fatal to Tule Elk or other wildlife to the benefit of ranching operations, and encourage the agency to adopt Option F to discontinue grazing and allow members of the public to enjoy this beautiful park and to be enriched with opportunities to visit and appreciate this special place.

#5537

Name: Jackson, Garry

Correspondence: As a resident of Marin County and frequent visitor all parts of Pt Reyes National Seashore, including the very popular Pierce Point trail, I am writing to urge the National Park Service to discontinue the grazing of beef and dairy cattle at Point Reyes National Seashore. This precious area has been damaged by livestock grazing which poses a threat to the environment and local wildlife and the area should be protected and used to serve the public good, and not for the benefit of the livestock industry. The cattle ranches already occupy tremendous acreage in the Park and surrounding Counties, they don't also need to eliminate these elk and take that land.

I strongly oppose Option B and any other proposal that would be fatal to Tule Elk or other wildlife to the benefit of ranching operations, and encourage the agency to adopt Option F to discontinue grazing and allow members of the public to enjoy this beautiful park and to be enriched with opportunities to visit and appreciate this special place.

#5538

Name: Koessel, Karl

Correspondence: I am writing to urge the National Park Service to discontinue the grazing of beef and dairy cattle at Point Reyes National Seashore. This precious area has been damaged by livestock grazing which poses a threat to the environment and local wildlife and it should be protected and used to serve the public good, and not for the benefit of the livestock industry.

I strongly oppose Option B and any other proposal that would be fatal to Tule Elk or other wildlife to the benefit of ranching operations, and encourage the agency to adopt Option F to discontinue grazing and allow members of the public to enjoy this beautiful park and to be enriched with opportunities to visit and appreciate this special place.

Thank you for your attention to my opinion.

Sincerely,



Karl Koessel

#5539

Name: Oelker, Gregg

Correspondence: I am writing to urge the National Park Service to discontinue the grazing of beef and dairy cattle at Point Reyes National Seashore. This precious area has been damaged by livestock grazing which poses a threat to the environment and local wildlife and it should be protected and used to serve the public good, and not for the benefit of the livestock industry. Cows do not belong in this beautiful area. It's time to let this area go back to its natural state.

I strongly oppose Option B and any other proposal that would be fatal to Tule Elk or other wildlife to the benefit of ranching operations, and encourage the agency to adopt Option F to discontinue grazing and allow members of the public to enjoy this beautiful park and to be enriched with opportunities to visit and appreciate this special place.

#5540

Name: La Belle, Deborah

Correspondence: I am writing to urge the National Park Service to discontinue the grazing of beef and dairy cattle at Point Reyes National Seashore. This precious area has been damaged by livestock grazing which poses a threat to the environment and local wildlife and it should be protected and used to serve the public good, and not for the benefit of the livestock industry.

I strongly oppose Option B and any other proposal that would be fatal to Tule Elk or other wildlife to the benefit of ranching operations, and encourage the agency to adopt Option F to discontinue grazing and allow members of the public to enjoy this beautiful park and to be enriched with opportunities to visit and appreciate this special place.

Deborah La Belle

#5541

Name: Betti, Mark

Correspondence: I am writing to urge the National Park Service to discontinue the grazing of beef and dairy cattle at Point Reyes National Seashore. This precious area has been damaged by livestock grazing which poses a threat to the environment and local wildlife and it should be protected and used to serve the public good, and not for the benefit of the livestock industry.

I strongly oppose Option B and any other proposal that would be fatal to Tule Elk or other wildlife to the benefit of ranching operations, and encourage the agency to adopt Option F to discontinue grazing and allow members of the public to enjoy this beautiful park and to be enriched with opportunities to visit and appreciate this special place.

Thank you for your consideration.

#5542

Name: Elliott, Ed

Correspondence: I am writing to urge the National Park Service to discontinue the grazing of beef and dairy cattle at Point Reyes National Seashore. This precious area has been damaged by livestock grazing which poses a threat to the environment and local wildlife and it should be protected and used to serve the public good, and not for the benefit of the livestock industry.

I strongly oppose Option B and any other proposal that would be fatal to Tule Elk or other wildlife to the benefit of ranching operations, and encourage the agency to adopt Option F to discontinue grazing and allow members of the public to enjoy this beautiful park and to be enriched with opportunities to visit and appreciate this special place.

#5543

Name: Callahan, CL

Correspondence: Stop using animals. EVOLVE already! You may not take more land for cattle.

#5544

Name: Shankar, Cheri

Correspondence: I am writing to urge the National Park Service to discontinue the grazing of beef and dairy cattle at Point Reyes National Seashore. This precious area has been damaged by livestock grazing which poses a threat to the environment and local wildlife and it should be protected and used to serve the public good, and not for the benefit of the livestock industry.

I strongly oppose Option B and any other proposal that would be fatal to Tule Elk or other wildlife to the benefit of ranching operations, and encourage the agency to adopt Option F to discontinue grazing and allow members of the public to enjoy this beautiful park and to be enriched with opportunities to visit and appreciate this special place.

This park belongs to the public, NOT cattle ranchers who are part of the destruction of our environment and the planet.

#5545

Name: Powell, Justina

Correspondence: I am writing to urge the National Park Service to discontinue the grazing of beef and dairy cattle at Point Reyes National Seashore. This precious area has been damaged by livestock grazing which poses a threat to the environment and local wildlife and it should be protected and used to serve the public good, and not for the benefit of the livestock industry.

I strongly oppose Option B and any other proposal that would be fatal to Tule Elk or other wildlife to the benefit of ranching operations, and encourage the agency to adopt Option F to discontinue grazing and allow members of the public to enjoy this beautiful park and to be enriched with opportunities to visit and appreciate this special place.

#5546

Name: Schuman, Laura

Correspondence: I am writing to urge the National Park Service to discontinue the grazing of beef and dairy cattle at Point Reyes National Seashore. This precious area has been damaged by livestock grazing which poses a threat to the environment and local wildlife and it should be protected and used to serve the public good, and not for the benefit of the livestock industry.

I strongly oppose Option B and any other proposal that would be fatal to Tule Elk or other wildlife to the benefit of ranching operations, and encourage the agency to adopt Option F to discontinue grazing and allow members of the public to enjoy this beautiful park and to be enriched with opportunities to visit and appreciate this special place.

#5547

Name: Brunner, Darla

Correspondence: GOOD GRIEF, DON'T KILL THE NATIRE TULE ELK SO RICH RANCHERS CAN GRAZE CATTLE AND THEN KILL THEM TOO. STOP THE CATTLE GRAZING AT POINT REYES!

WE MUST DISCONTINUE THE GRAZING OF CATTLE AT POINT REYES NATIONAL SEASHORE.

THE AREA IS ALREADY DAMAGED. I STRONG OPPOSE OPTION B AND ANY PROPOSAL THAT HARMS WILDLIFE INCLUDING THE TULE ELK JUST SO PEOPLE CAN KILL OTHER ANIMALS AND EAT THEM AND GET CANCER AND HEART DISEASE.

ONLY THE MEMBERS OF THE PUBLIC SHOULD BE ALLOWED TO ENJOY THIS BEAUTIFUYL SPOT. STOP CATTLE GRAZING ON PUBLIC LANDS! STOP CATERING TO RICH RANSHERS INTERESTS.

THANK YOU.

#5548

Name: Spencer, Adelaide

Correspondence: Definitely the natural animals are more important than cattle. the family has a house at Stinson Beach and we want to see the area kept as free from special interests as possible..

#5549

Name: Fromberg, Jeff

Correspondence: Protect Tule elk. Carlyle grazing should not be allowed in Pt. Reyes

#5550

Name: N/A, Kristen

Correspondence: I am writing to urge the National Park Service to discontinue the grazing of beef and dairy cattle at Point Reyes National Seashore. This precious area has been damaged by livestock grazing which poses a threat to the environment and local wildlife and it should be protected and used to serve the public good, and not for the benefit of the livestock industry.

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#5551

Name: N/A, N/A

Correspondence: I am writing to urge the National Park Service to discontinue the grazing of beef and dairy cattle at Point Reyes National Seashore. This precious area has been damaged by livestock grazing which poses a threat to the environment and local wildlife and it should be protected and used to serve the public good, and not for the benefit of the livestock industry.

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#5552

Name: Redish, Maryellen

Correspondence: I am writing to urge the National Park Service to discontinue the grazing of beef and dairy cattle at Point Reyes National Seashore. This precious area has been damaged by livestock grazing which poses a threat to the environment and local wildlife and it should be protected and used to serve the public good, and not for the benefit of the livestock industry.

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#5553

Name: Rolley, Dennis

Correspondence: I am writing to urge the National Park Service to discontinue the grazing of beef and dairy cattle at Point Reyes National Seashore. This precious area has been damaged by livestock grazing which poses a threat to the environment and local wildlife and it should be protected and used to serve the public good, and not for the benefit of the livestock industry.

I strongly oppose Option B and any other proposal that would be fatal to Tule Elk or other wildlife to the benefit of ranching operations, and encourage the agency to adopt Option F to discontinue grazing and allow members of the public to enjoy this beautiful park and to be enriched with opportunities to visit and appreciate this special place.

#5554

Name: flam, merrill

Correspondence: I am writing to urge the National Park Service to discontinue the grazing of beef and dairy cattle at Point Reyes National Seashore. This precious area has been damaged by livestock grazing which poses a threat to the environment and local wildlife and it should be protected and used to serve the public good, and not for the benefit of the livestock industry.

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Thank you,

Merrill Flam

#5555

Name: Ridder, Lynette

Correspondence: I am writing to urge the National Park Service to discontinue the grazing of beef and dairy cattle at Point Reyes National Seashore. This precious area has been damaged by livestock grazing which poses a threat to the environment and local wildlife and it should be protected and used to serve the public good, and not for the benefit of the livestock industry.

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the public to enjoy this beautiful park and to be enriched with opportunities to visit and appreciate this special place.

#5556

Name: Brent, Linda

Correspondence: I am writing to urge the National Park Service to discontinue the grazing of beef and dairy cattle at Point Reyes National Seashore. This precious area has been damaged by livestock grazing which poses a threat to the environment and local wildlife and it should be protected and used to serve the public good, and not for the benefit of the livestock industry.

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#5557

Name: Hillman, Sid

Correspondence: I am writing to urge the National Park Service to discontinue the grazing of beef and dairy cattle at Point Reyes National Seashore. This precious area has been damaged by livestock grazing which poses a threat to the environment and local wildlife and it should be protected and used to serve the public good, and not for the benefit of the livestock industry.

I strongly oppose Option B and any other proposal that would be fatal to Tule Elk or other wildlife to the benefit of ranching operations, and encourage the agency to adopt Option F to discontinue grazing and allow members of the public to enjoy this beautiful park and to be enriched with opportunities to visit and appreciate this special place.

Do not expose our natural resources to these brutal industries.

#5558

Name: Steele, Mary

Correspondence: Please end livestock grazing at Point Reyes National Park and allow this precious land to remain as wildlife habitat. National parks should be used for the public good, not for the benefit of the livestock industry.

#5559

Name: Harmison, Karlen

Correspondence: I am writing to urge the National Park Service to discontinue the grazing of beef and dairy cattle at Point Reyes National Seashore. This precious area has been damaged by livestock grazing which poses a threat to the environment and local wildlife and it should be protected and used to serve the public good, and not for the benefit of the livestock industry.

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#5560

Name: Vijayakumar, Vidhya

Correspondence: I am writing to urge the National Park Service to discontinue the grazing of beef and dairy cattle at Point Reyes National Seashore. This precious area has been damaged by livestock grazing which poses a threat to the environment and local wildlife and it should be protected and used to serve the public good, and not for the benefit of the livestock industry.

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#5561

Name: Mikus, Jordan

Correspondence: I am writing to urge the National Park Service to discontinue the grazing of beef and dairy cattle at Point Reyes National Seashore. This precious area has been damaged by livestock grazing which poses a threat to the environment and local wildlife and it should be protected and used to serve the public good, and not for the benefit of the livestock industry.

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Thank you, Jordan Mikus

#5562

Name: N/A, N/A

Correspondence: I am writing to urge the National Park Service to discontinue the grazing of beef and dairy cattle at Point Reyes National Seashore. This precious area has been damaged by livestock grazing which poses a threat to the environment and local wildlife and it should be protected and used to serve the public good, and not for the benefit of the livestock industry.

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#5563

Name: McMahon, =Carol

Correspondence: I am writing to urge the National Park Service to discontinue the grazing of beef and dairy cattle at Point Reyes National Seashore. This precious area has been damaged by livestock grazing which poses a threat to the environment and local wildlife and it should be protected and used to serve the public good, and not for the benefit of the livestock industry.

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Submit Comment

#5564

Name: Cochran, Jean G.

Correspondence: Do not allow cattle grazing where only native animals belong.

#5565

Name: s, c

Correspondence: Please protect Point Reyes and protect precious Tule Elk from greedy, avaricious, amoral ranchers. Do NOT kill Tule Elk!!!

#5566

Name: Trembly, Dennis

Correspondence: I am writing to urge the National Park Service to discontinue the grazing of beef and dairy cattle at Point Reyes National Seashore. This precious area has been damaged by livestock grazing which poses a threat to the environment and local wildlife and it should be protected and used to serve the public good, and not for the benefit of the livestock industry.

I strongly oppose Option B and any other proposal that would be fatal to Tule Elk or other wildlife to the benefit of ranching operations, and encourage the agency to adopt Option F to discontinue grazing and allow members of the public to enjoy this beautiful park and to be enriched with opportunities to visit and appreciate this special place.

#5567

Name: Beauchamp, Catherine

Correspondence: I'm writing to urge the National Park Service to discontinue the grazing of beef and dairy cattle at Point Reyes National Seashore. This precious area has been damaged by livestock grazing which poses a threat to the environment and local wildlife and it should be protected and used to serve the public good, and not for the benefit of the livestock industry.

I strongly oppose Option B and any other proposal that would be fatal to Tule Elk or other wildlife to the benefit of ranching operations, and encourage the agency to adopt Option F to discontinue grazing and allow members of the public to enjoy this beautiful park and to be enriched with opportunities to visit and appreciate this special place.

#5568

Name: Siminski, Julian

Correspondence: Please protect the deer from the dairy farmers at Point Reyes and please do not cull the deer. There are really not so many that it would warrant culling. This land is their natural home whereas the dairy farmers were paid many times over when the land was purchased from them so we have no obligation to them now, certainly not over the wildlife that calls Point Reyes their home. Thank you!

#5569

Name: Horwich, Annamaria

Correspondence: I am vegan for 40 years by now. Humans are so evil that kill animals just to feed themselves and get fat than die in a heart attack or other disease. I don't care if they die but I do care for the animals. Humans must stop breeding animals for food or entertainment industry. You must protect wildlife and their territory that is decreasing fast!

#5570

Name: Kowalski, Jeanne

Correspondence: I am writing to urge the National Park Service to discontinue the grazing of beef and dairy cattle at Point Reyes National Seashore. This precious area has been damaged by livestock grazing which poses a threat to the environment and local wildlife and it should be protected and used to serve the public good, and not for the benefit of the livestock industry.

I strongly oppose Option B and any other proposal that would be fatal to Tule Elk or other wildlife to the benefit of ranching operations, and encourage the agency to adopt Option F to discontinue grazing and allow members of the public to enjoy this beautiful park and to be enriched with opportunities to visit and appreciate this special place.

I am deeply alarmed that killing natural wild inhabitants of this area in service to the livestock industry is even being considered.

#5571

Name: Jagannath, Gautam

Correspondence: I am writing to urge the National Park Service to discontinue the grazing of beef and dairy cattle at Point Reyes National Seashore. This precious area has been damaged by livestock grazing which poses a threat to the environment and local wildlife and it should be protected and used to serve the public good, and not for the benefit of the livestock industry.

I strongly oppose Option B and any other proposal that would be fatal to Tule Elk or other wildlife to the benefit of ranching operations, and encourage the agency to adopt Option F to discontinue grazing and allow members of the public to enjoy this beautiful park and to be enriched with opportunities to visit and appreciate this special place.

#5572

Name: tarlow, kathleen

Correspondence: I am writing to urge the National Park Service to discontinue the grazing of beef and dairy cattle at Point Reyes National Seashore. This precious area has been damaged by livestock grazing which poses a threat to the environment and local wildlife and it should be protected and used to serve the public good, and not for the benefit of the livestock industry.

I strongly oppose Option B and any other proposal that would be fatal to Tule Elk or other wildlife to the benefit of ranching operations, and encourage the agency to adopt Option F to discontinue grazing and allow members of the public to enjoy this beautiful park and to be enriched with opportunities to visit and appreciate this special place.

#5573

Name: N/A, N/A

Correspondence: I am writing to urge the National Park Service to discontinue the grazing of beef and dairy cattle at Point Reyes National Seashore. This precious area has been damaged by livestock grazing which poses a threat to the environment and local wildlife and it should be protected and used to serve the public good, and not for the benefit of the livestock industry.

I strongly oppose Option B and any other proposal that would be fatal to Tule Elk or other wildlife to the benefit of ranching operations, and encourage the agency to adopt Option F to discontinue grazing and allow members of



the public to enjoy this beautiful park and to be enriched with opportunities to visit and appreciate this special place.

#5574

Name: Venezia, Sherri

Correspondence: I am writing to urge the National Park Service to discontinue the grazing of beef and dairy cattle at Point Reyes National Seashore. This precious area has been damaged by livestock grazing which poses a threat to the environment and local wildlife and it should be protected and used to serve the public good, and not for the benefit of the livestock industry.

I strongly oppose Option B and any other proposal that would be fatal to Tule Elk or other wildlife to the benefit of ranching operations, and encourage the agency to adopt Option F to discontinue grazing and allow members of the public to enjoy this beautiful park and to be enriched with opportunities to visit and appreciate this special place.

#5575

Name: McDowell, Kelley

Correspondence: I'm writing to urge National Park Service to discontinue the grazing of beef and dairy cattle at Point Reyes National Seashore. This area has been damaged by grazing and should be protected and used to serve the public good and not for the benefit of the livestock industry. I strongly oppose Option B and any other proposal that would be fatal to Tule Elk or other wildlife and encourage the agency to adopt Option F.

#5576

Name: N/A, N/A

Correspondence: I am writing to urge the National Park Service to discontinue the grazing of beef and dairy cattle at Point Reyes National Seashore. This precious area has been damaged by livestock grazing which poses a threat to the environment and local wildlife and it should be protected and used to serve the public good, and not for the benefit of the livestock industry.

I strongly oppose Option B and any other proposal that would be fatal to Tule Elk or other wildlife to the benefit of ranching operations, and encourage the agency to adopt Option F to discontinue grazing and allow members of the public to enjoy this beautiful park and to be enriched with opportunities to visit and appreciate this special place.

#5577

Name: N/A, N/A

Correspondence: I fervently oppose permitting public lands to be utilized for grazing of non-native species, especially where this will impinge upon the limited and dwindling territory that exists for native species to utilize. In particular, grazing of livestock serves no useful purpose for anyone but profiteers, a tiny fraction of the population. Allowing this to happen would be short-sighted and unethical and cause disastrous harm to our wild heritage. As stewards of our wild lands, the NPS must protect our natural heritage.

#5578

Name: N/A, N/A

Correspondence: I am writing to urge the National Park Service to discontinue the grazing of beef and dairy cattle at Point Reyes National Seashore. This precious area has been damaged by livestock grazing which poses a threat to the environment and local wildlife and it should be protected and used to serve the public good, and not for the benefit of the livestock industry.

I strongly oppose Option B and any other proposal that would be fatal to Tule Elk or other wildlife to the benefit of ranching operations, and encourage the agency to adopt Option F to discontinue grazing and allow members of the public to enjoy this beautiful park and to be enriched with opportunities to visit and appreciate this special place.

#5579

Name: Tremmel, Leonard

Correspondence: I am writing to urge the National Park Service to discontinue the grazing of beef and dairy cattle at Point Reyes National Seashore. This precious area has been damaged by livestock grazing which poses a threat to the environment and local wildlife and it should be protected and used to serve the public good, and not for the benefit of the livestock industry.

I strongly oppose Option B and any other proposal that would be fatal to Tule Elk or other wildlife to the benefit of ranching operations, and encourage the agency to adopt Option F to discontinue grazing and allow members of the public to enjoy this beautiful park and to be enriched with opportunities to visit and appreciate this special place. The Tule Elk were there first, and should be protected from encroachment by industrial operations.

#5580

Name: Wamsganz, Marlo

Correspondence: I am writing to urge the National Park Service to discontinue the grazing of beef and dairy cattle at Point Reyes National Seashore. This precious area has been damaged by livestock grazing which poses a threat to the environment and local wildlife and it should be protected and used to serve the public good, and not for the benefit of the livestock industry.

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#5581

Name: Buckley, Dianne

Correspondence: Enough Negative Impact has been committed due to Clearing (Brazil, Cattle vs Ozone Layer and Methane Gas Production. We have Lost 3 Billion Birds Alone since 1970, largely due to Habitat Destruction. There will soon be No Critical Biodiversity and Eventually No Healthy Food and No Earth at the Rate the Current Administration is Bent on Raping and Pillaging for TODAY with No Thought about Tomorrow.

#5582

Name: Visick, Buffy

Correspondence: We need less land used for animal exploitation, not more. Enough.

#5583

Name: Wayne, Lisa

Correspondence: I am writing to urge the National Park Service to discontinue the grazing of beef and dairy cattle at Point Reyes National Seashore. This precious area has been damaged by livestock grazing which poses a threat to the environment and local wildlife and it should be protected and used to serve the public good, and not for the benefit of the livestock industry.

I strongly oppose Option B and any other proposal that would be fatal to Tule Elk or other wildlife to the benefit of ranching operations, and encourage the agency to adopt Option F to discontinue grazing and allow members of the public to enjoy this beautiful park and to be enriched with opportunities to visit and appreciate this special place.

#5584

Name: White, Pamela

Correspondence: I am writing to urge the National Park Service to discontinue the grazing of beef and dairy cattle at Point Reyes National Seashore. This precious area has been damaged by livestock grazing which poses a threat to the environment and local wildlife and it should be protected and used to serve the public good, and not for the benefit of the livestock industry.

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Thank you for your attention to this important matter.

#5585

Name: McDonald, Lis

Correspondence: I am writing to urge the National Park Service to discontinue the grazing of beef and dairy cattle at Point Reyes National Seashore. This precious area has been damaged by livestock grazing which poses a threat to the environment and local wildlife and it should be protected and used to serve the public good, and not for the benefit of the livestock industry.

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#5586

Name: Whitaker, Howard

Correspondence: I am writing to urge the National Park Service to discontinue the grazing of beef and dairy cattle at Point Reyes National Seashore. This precious area has been damaged by livestock grazing which poses a threat to the environment and local wildlife and it should be protected and used to serve the public good, and not for the benefit of the livestock industry.

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#5587

Name: Fowler, Liz

Correspondence: I am writing to urge the National Park Service to discontinue the grazing of beef and dairy cattle at Point Reyes National Seashore. This precious area has been damaged by livestock grazing which poses a threat to the environment and local wildlife and it should be protected and used to serve the public good, and not for the benefit of the livestock industry.

I strongly oppose Option B and any other proposal that would be fatal to Tule Elk or other wildlife to the benefit of ranching operations, and encourage the agency to PLEASE adopt Option F to discontinue grazing and allow members of the public to enjoy this beautiful park and to be enriched with opportunities to visit and appreciate this special place.

#5588

Name: N/A, N/A

Correspondence: Please keep the Tule Elk herd at Point Reyes protected.

#5589

Name: Milliken, Rosalind

Correspondence: Ranchers may be used to using National Land at a discount, making a profit using our wealth to create their richness, but now that we have Tule Elk grazing, their profit no longer benefits the national need for wildlife. We cannot afford to let their personal profit diminish the national wealth. Less milk and beef herds means ranchers and dairy people can get more money for less work. That is how capitalism works. Restoring the Tule Elk and other wild life brings more wealth to the community as more people will make the park a destination. Ranchers won't lose if they lose their licenses. The communities around will gain if they do. It is a matter of who will profit, one industry vs another.

#5590

Name: Rodriguez, Sonia

Correspondence: I am writing to urge the National Park Service to discontinue the grazing of beef and dairy cattle at Point Reyes National Seashore. This precious area has been damaged by livestock grazing which poses a threat to the environment and local wildlife and it should be protected and used to serve the public good, and not for the benefit of the livestock industry.

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#5591

Name: Hopen, Penelope

Correspondence: I am writing to urge the National Park Service to discontinue the grazing of beef and dairy cattle at Point Reyes National Seashore. This precious area has been damaged by livestock grazing which poses a threat to the environment and local wildlife and it should be protected and used to serve the public good, and not for the benefit of the livestock industry.

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#5592

Name: elkhorn, slim

Correspondence: WE DONT NEED MORE BEEF THERES MORE meat everywhere and there is NO need for cattel grazing in this area at point reys NO NEED TO SUPORRT CATTEL INDUSTRY

#5593

Name: Hewitt, Linda

Correspondence: I am writing to urge the National Park Service to discontinue the grazing of beef and dairy cattle at Point Reyes National Seashore. This precious area has been damaged by livestock grazing which poses a threat to the environment and local wildlife and it should be protected and used to serve the public good, and not for the benefit of the livestock industry.

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#5594

Name: N/A, N/A

Correspondence: I am writing to urge the National Park Service to discontinue the grazing of beef and dairy cattle at Point Reyes National Seashore. This precious area has been damaged by livestock grazing which poses a threat to the environment and local wildlife and it should be protected and used to serve the public good, and not for the benefit of the livestock industry.

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#5595

Name: Schwartzbart, Tamar

Correspondence: Please do not allow agricultural endeavors such as livestock encroach in the habitat of the beautiful Point Reyes. The Tule Elk are beautiful and as a resident of the bay area and a lover of nature I am 100% apposed and appalled to hear people are proposing to slaughter these majestic animals who are also a crucial part of the ecosystem at Point Reyes

#5596

Name: Brunner, Darla

Correspondence: I care about protecting California's wildlife. I oppose the National Park Service's plan to kill native tule elk and expand commercial agriculture in Point Reyes National Seashore and Golden Gate National Recreation Area. I urge the National Park Service to instead restore the lands for wild animal habitat.

#5597

Name: N/A, N/A

Correspondence: I am writing to urge the National Park Service to discontinue the grazing of beef and dairy cattle at Point Reyes National Seashore. This precious area has been damaged by livestock grazing which poses a threat to the environment and local wildlife and it should be protected and used to serve the public good, and not for the benefit of the livestock industry.

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#5598

Name: N/A, N/A

Correspondence: I am writing to urge the National Park Service to discontinue the grazing of beef and dairy cattle at Point Reyes National Seashore. This precious area has been damaged by livestock grazing which poses a threat to the environment and local wildlife and it should be protected and used to serve the public good, and not for the benefit of the livestock industry.

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#5599

Name: Mapel, Alexis

Correspondence: I am writing to urge the National Park Service to discontinue the grazing of beef and dairy cattle at Point Reyes National Seashore. This precious area has been damaged by livestock grazing which poses a threat to the environment and local wildlife and it should be protected and used to serve the public good, and not for the benefit of the livestock industry.

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#5600

Name: Robins, Angel

Correspondence: Please don't renew or extend the lease of land to cattle ranchers. The Park is for wildlife to live their lives free from human harm, it is their home.

Again, Please, leave the wild animals alone. Please DON'T renew those leases!

Sincerely, Mrs. Angel Robinson

#5601

Name: Alexander, Mark

Correspondence: I am writing to urge the National Park Service to discontinue the grazing of beef and dairy cattle at Point Reyes National Seashore. This precious area has been damaged by livestock grazing which poses a threat to the environment and local wildlife and it should be protected and used to serve the public good, and not for the benefit of the livestock industry.

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Sincerely, Mark Alexander

#5602

Name: RICHMOND, LONNA

Correspondence:

I am writing to urge the National Park Service to discontinue the grazing of beef and dairy cattle at Point Reyes National Seashore. This precious area has been damaged by livestock grazing which poses a threat to the environment and local wildlife and it should be protected and used to serve the public good, and not for the benefit of the livestock industry.

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Sincerely,

Lonna Richmond

#5603

Name: PIERCE, ELAINE

Correspondence: For God's sake, haven't we human's killed enough! Stop! Stop! Let them live in peace.

#5604

Name: Tullsen-Chin, Sherrie

Correspondence: I am writing to urge the National Park Service to discontinue the grazing of beef and dairy cattle at Point Reyes National Seashore. This precious area has been damaged by livestock grazing which poses a threat to the environment and local wildlife and it should be protected and used to serve the public good, and not for the benefit of the livestock industry.

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#5605

Name: Davis, Scott

Correspondence: I am writing to urge the National Park Service to discontinue the grazing of beef and dairy cattle at Point Reyes National Seashore. This precious area has been damaged by livestock grazing which poses a threat to the environment and local wildlife and it should be protected and used to serve the public good, and not for the benefit of the livestock industry.

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#5606

Name: SCHACHTERLE, KENDA

Correspondence: I am writing to urge the National Park Service to discontinue the grazing of beef and dairy cattle at Point Reyes National Seashore. This precious area has been damaged by livestock grazing which poses a threat to the environment and local wildlife and it should be protected and used to serve the public good, and not for the benefit of the livestock industry.

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#5607

Name: Jacques, Karen

Correspondence: I am utterly opposed to this extremely cruel plan to kill a native species, tule elk, to allow still more cattle grazing at Point Reyes. A huge portion of our public lands, including Point Reyes already allow cattle grazing and there is already far too much cattle grazing at far too great a cost to native species on our public lands. I have visited point Reyes and one of the reasons is the tule elk. I consider the killing of the tule elk to be profoundly unethical and yet one more example of the contempt that the federal government shows toward wild life and wild places. Please stop putting cattle ranchers above the people who visit Point Reyes and above wildlife.

#5608

Name: Rubio, Karen

Correspondence: Dear National Park Service:

Please do not allow the grazing of beef and dairy Livestock grazing benefits only a few ranchers and degrades the environment. This area MUST be protected and used to serve the public good, and not for the benefit of the livestock industry.

I strongly oppose Option B and any other proposal that would be fatal to Tule Elk or other wildlife to the benefit of ranching operations. The agency MUST choose Option F to discontinue grazing and allow members of the public to enjoy this beautiful park and preserve it for future generations.

#5609

Name: Coe, Pin

Correspondence: Enough exploitation of wildlands for profit! Stop killing our legacy for money!

#5610

Name: Novak, Mike

Correspondence: I am writing to urge the National Park Service to discontinue the grazing of beef and dairy cattle at Point Reyes National Seashore. This precious area has been damaged by livestock grazing which poses a threat to the environment and local wildlife and it should be protected and used to serve the public good, and not for the benefit of the livestock industry.

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the public to enjoy this beautiful park and to be enriched with opportunities to visit and appreciate this special place.

#5611

Name: Sternin, Lesley

Correspondence: Please allow the Elk to continue to live out their lives in Pt Reyes. Pt Reyes is such a special place and the Elk are a part of it. Grazing for cattle should not come at the expense of the wildlife there.

#5612

Name: N/A, N/A

Correspondence: I am writing to urge the National Park Service to discontinue the grazing of beef and dairy cattle at Point Reyes National Seashore. This precious area has been damaged by livestock grazing which poses a threat to the environment and local wildlife and it should be protected and used to serve the public good, and not for the benefit of the livestock industry.

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#5613

Name: Khardina-Vaisman, Anna

Correspondence: I am writing to urge the National Park Service to discontinue the grazing of beef and dairy cattle at Point Reyes National Seashore. This precious area has been damaged by livestock grazing which poses a threat to the environment and local wildlife and it should be protected and used to serve the public good, and not for the benefit of the livestock industry.

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#5614

Name: Boswell, Adam

Correspondence: I am writing to urge the National Park Service to discontinue the grazing of beef and dairy cattle at Point Reyes National Seashore. This precious area has been damaged by livestock grazing which poses a threat to the environment and local wildlife and it should be protected and used to serve the public good, and not for the benefit of the livestock industry.

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#5615

Name: Menasco, Mika

Correspondence: Preserve out wild lands and wildlife!!!!!!!!!!

#5616

Name: McCullough, Kimberly

Correspondence: We need to protect nature and not kill native animals for no reason. Point Reyes National Park should be a wildlife habitat and not be "used" for profit for cattle grazing. NPS should be "serving" National Parks and caring for the land and the native animals on it.

#5617

Name: Diamante, Nina

Correspondence: No grazing ever of livestock, cattle in any parks.

#5618

Name: Getter, Camile

Correspondence: I am writing to urge the National Park Service to discontinue the grazing of beef and dairy cattle at Point Reyes National Seashore. This precious area has been damaged by livestock grazing which poses a threat to the environment and local wildlife and it should be protected and used to serve the public good, and not for the benefit of the livestock industry.

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#5619

Name: Bernstein, F.

Correspondence: Wildlife cannot speak for themselves, therefore, I am speaking for them. The wildlife in this area was here long before the cattle and deserve to stay. Cattle can graze in other areas. It is not reasonable to kill off animals that are natural to the area so other animals can be brought in and raised for someone's profit.

Protect the wildlife. Do not take their lives or the land they live on.

#5620

Name: Kramer, Ann

Correspondence: I recently visited Point Reyes NP Seashore for the second time. I've been making it a practice to visit the National Parks within the Western States as I'm a California resident and plan to retire soon. I enjoy the rolling hills of Point Reyes NP, the climate, the assorted wildlife, the Lagoon, and the city. It's a beautiful spot. I've seen, on my two visits, Bobcats, a Weasel, River Otters, Badgers, Hawks, Osprey, Elk, Coyotes, Herrier and a skunk! It is refreshing to see wildlife in it's natural habitat free from encroachment. I learned of the proposed changes to the park by the National Park Service. The plan to cull (kill) the elk herd to maintain 120 and to convert some of the land to crops and farm animals was stunning and sad to me. I had to read it a couple of times to believe what I was reading. It is incomprehensible to me how a National Park could be developing land with crops and more farm animals when there are abundant acres of farm crops all over California. I think it is the mission of National Parks to protect and preserve what is wild and natural. How do crops and farm animals serve that goal? My understanding of PRNS was that when the park became a dedicated national park, the ranches in the area were allowed to continue their ranches for 25 years or the life of the owner. That has long been surpassed and it looks as though there is no intention for the ranches to be eliminated or finished. It's an odd thing for me to drive through a NP with cows in every sector of the park. I have to surmise this tolerance and violation of the original agreement is a contributor to these current decisions which will further put the nature and wildlife at peril. How will a bobcat or a coyote or a hawk or any other predator be treated when they invade crops? What

about small animals? Is a predator likely to know this is hands off? There is already a bit of a war going on with ranchers and coyotes. How will these new rules provide sanctuary for wildlife? We are undergoing a reversal in our current political environment for concern for environment, protection of wildlife and endangered species, provision of migration paths, protection of national parks and wetlands. This administration has consistently catered to money and industry over the welfare of our country, it's people and our natural resources. I did not expect this to extend to California and I am further disheartened and angry to see these decisions. I'm strongly against what the National Park system is allowing here. This would be an opportunity in the least to set an example for the nation and how to manage cattle and nature in some coexistence, to live with respect for one another. We are, after all, on their land. Respect for the natural should, in the least, be a priority in a National Park. I implore you to reconsider this decision. It is obvious that these decisions are based on money and the undermining of what a National Park is intended to be.

A Cree proverb: "Only when the last tree has died and the last river has been poisoned and the last fish has been caught will we realize we can't eat money."

And, we can't breathe it, or visit it, or find our connection with ourselves and nature in it either.

Ann Kramer

#5621

Name: Ricewater, Robert

Correspondence: I am writing to urge the National Park Service to discontinue the grazing of beef and dairy cattle at Point Reyes National Seashore. This precious area has been damaged by livestock grazing which poses a threat to the environment and local wildlife and it should be protected and used to serve the public good, and not for the benefit of the livestock industry.

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#5622

Name: Clark, Robert

Correspondence: We enjoy the park on a weekly bases and have hiked most of the trails in the park. I have also in the past ridden my bike but find the traffic to be too much of a risk for me these days. We have ridden the trails that are available but would like to see more bike trails opened up for adventures throughout the park. I appreciate and support the improvements in public and bicycle access outlined under Alternatives B, C, D, E, and F. I also support the following trail connections and plan elements:

- A connection between Devil's Gulch and Platform Bridge Road using existing ranch roads. - A connection between Bolinas Ridge Trail at Olema Hill and Point Reyes Station to serve as an interim connection for the Cross Marin Trail. - A connection between Bolinas Ridge Trail and Five Brooks Stables using existing ranch roads. - A connection between Drakes Estero and Abbotts Lagoon Trail using existing ranch roads. -A connection between Marshall Beach Trailhead and Pierce Point Road using existing ranch roads. - An Estero Trail loop using existing ranch roads. - Collaboration with ranchers and other stakeholders to educate the public and address concerns related to public access on working ranch lands.

#5623

Name: Lee, Lily

Correspondence: I am writing to urge the National Park Service to discontinue the grazing of beef and dairy cattle

at Point Reyes National Seashore. This precious area has been damaged by livestock grazing which poses a threat to the environment and local wildlife and it should be protected and used to serve the public good, and not for the benefit of the livestock industry.

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#5624

Name: N/A, N/A

Correspondence: the preservation of native wild species must take precedence over farming and ranching activities. Remind it that grazing negatively affects ecosystems, causing water pollution and soil erosion, spreading invasive species and disease, and harming endangered species.

#5625

Name: Migas, Patrick

Correspondence: Alternative F is my choice. The cattle are destroying the land and endangering native, threatened species. The dairy lease should have been retired years ago!

#5626

Name: Shubert, Lois

Correspondence: All our wild animals that live through out this world need the protection of the human occupants. We must do everything possible to see that their ranges are protected and not destroyed by humans for their own purposes. GOD gave us this earth to take care of and we must protect all it's occupants, human or animal.

#5627

Name: de la Ossa, Brenda

Correspondence: Please please protect the wildlife at Point Raise. It is a part of California that is so beautiful. Please do not destroy the area by allowing cattle to graze. Thank you Brenda de la Ossa

#5628

Name: Owens, Paul

Correspondence: I am writing to urge the National Park Service to discontinue the grazing of beef and dairy cattle at Point Reyes National Seashore. This precious area has been damaged by livestock grazing which poses a threat to the environment and local wildlife and it should be protected and used to serve the public good, and not for the benefit of the livestock industry.

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#5629

Name: kremer, sue

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at Point Reyes National Seashore. This precious area has been damaged by livestock grazing which poses a threat to the environment and local wildlife and it should be protected and used to serve the public good, and not for the benefit of the livestock industry.

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Sue

#5630

Name: Mahrt, Jack

Correspondence: Please do not allow farm animals at Pt. Reyes. Thanks

#5631

Name: Owen, Anthony

Correspondence: Take the green position, support wildlife.

#5632

Name: Kersels, Kristina

Correspondence: I am writing to urge the National Park Service to discontinue the grazing of beef and dairy cattle at Point Reyes National Seashore. This precious area has been damaged by livestock grazing which poses a threat to the environment and local wildlife and it should be protected and used to serve the public good, and not for the benefit of the livestock industry.

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#5633

Name: Henley, Charlene

Correspondence: Please keep all grasslands open for wild animals, not for cattle grazing.

#5634

Name: Bernards, Teresa

Correspondence: The elk belong there, not cattle! Please let them live....

#5635

Name: Dunn, Kelly

Correspondence: I am writing to urge the National Park Service to discontinue the grazing of beef and dairy cattle at Point Reyes National Seashore. This precious area has been damaged by livestock grazing which poses a threat to the environment and local wildlife and it should be protected and used to serve the public good, and not for the benefit of the livestock industry.

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#5636

Name: Duon , Nicolas

Correspondence: I am writing to urge the National Park Service to discontinue the grazing of beef and dairy cattle at Point Reyes National Seashore. This precious area has been damaged by livestock grazing which poses a threat to the environment and local wildlife and it should be protected and used to serve the public good, and not for the benefit of the livestock industry.

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#5637

Name: N/A, N/A

Correspondence: Leave our land alone It is not for sale to you polluters & animal abusers. You torture & murder. It's amazing to me that industries like yours believe you can do whatever you want without the permission of the Ms y people who own the land - - public land. Before you try anything, Native Peoples have claim to these lands. To my fellow citizens, don't let these polluters destroy our lands, our water , our air.

#5638

Name: Risso, Susanne

Correspondence: I am writing to urge the National Park Service to discontinue the grazing of beef and dairy cattle at Point Reyes National Seashore. This precious area has been damaged by livestock grazing which poses a threat to the environment and local wildlife and it should be protected and used to serve the public good, and not for the benefit of the livestock industry.

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#5639

Name: Hecker, Dominique

Correspondence: Hello. I was born and raised in Petaluma and currently live I'm apart of Petaluma that is in Marin County. The great joy where I live is the native wildlife. I have lived a vegan lifestyle for eleven years. I do not agree with animal agriculture. It is a practice that has destructive impacts on our environment and thus, resources. I also don't agree with killing native animals to make way for people to make money off of raising animals for food/clothes/etc... please protect wildlife habitat and native Tule Elk, amongst many other native animals that cattle have an impact on. Please protect the land for the people, not for businesses to exploit animals and make money off of them. Please protect wildlife habitat for the sake of our resources (clean air, clean water, healthy soil...) as these should be for the people who live here instead of used or destroyed by animals for the sake of profit. Humans don't need to eat livestock to live healthy lives. I am currently enrolled in a food nutrition class and meat isn't even on the newest version of the periodic table. A non-necessity that is shrouded by so much

inhumanity and environmental destruction should not be protected by the government, our resources and wildlife habitat should.

#5640

Name: N/A, Athena

Correspondence: It is absolutely wrong on all levels to kill a herd of elk minding their business in their natural habitat so that YOU can attempt to breathe life back into the dying animal agriculture industry. We have too much meat as it is, billions of pounds of meat from cattle goes bad every year because PEOPLE DONT EAT THAT HORRIBLE SHIT ANYMORE! The world is dying because of people like you! Get your shit together!

#5641

Name: Baldwin, Paul

Correspondence: I am writing to urge the National Park Service to discontinue the grazing of beef and dairy cattle at Point Reyes National Seashore. This precious area has been damaged by livestock grazing which poses a threat to the environment and local wildlife and it should be protected and used to serve the public good, and not for the benefit of the livestock industry.

I strongly oppose Option B and any other proposal that would be fatal to Tule Elk or other wildlife to the benefit of ranching operations, and encourage the agency to adopt Option F to discontinue grazing and allow members of the public to enjoy this beautiful park and to be enriched with opportunities to visit and appreciate this special place.

#5642

Name: Scholar , Sarah

Correspondence: I am writing to urge the National Park Service to discontinue the grazing of beef and dairy cattle at Point Reyes National Seashore. This precious area has been damaged by livestock grazing which poses a threat to the environment and local wildlife and it should be protected and used to serve the public good, and not for the benefit of the livestock industry.

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#5643

Name: Duonn, Nico

Correspondence: I am writing to urge the National Park Service to discontinue the grazing of beef and dairy cattle at Point Reyes National Seashore. This precious area has been damaged by livestock grazing which poses a threat to the environment and local wildlife and it should be protected and used to serve the public good, and not for the benefit of the livestock industry.

I strongly oppose Option B and any other proposal that would be fatal to Tule Elk or other wildlife to the benefit of ranching operations, and encourage the agency to adopt Option F to discontinue grazing and allow members of the public to enjoy this beautiful park and to be enriched with opportunities to visit and appreciate this special place.

#5644

Name: Morris, SOPHIA

Correspondence: Please do not lease public land to farmers. Public lands are one of the few sacred things we have left in the US, and are far and few between. This land is meant for free flowing wildlife, not the damage cattle does to the land directly and indirectly. Thank you

#5645

Name: N/A, N/A

Correspondence: I am writing to urge the National Park Service to discontinue the grazing of beef and dairy cattle at Point Reyes National Seashore. This precious area has been damaged by livestock grazing which poses a threat to the environment and local wildlife and it should be protected and used to serve the public good, and not for the benefit of the livestock industry.

I strongly oppose Option B and any other proposal that would be fatal to Tule Elk or other wildlife to the benefit of ranching operations, and encourage the agency to adopt Option F to discontinue grazing and allow members of the public to enjoy this beautiful park and to be enriched with opportunities to visit and appreciate this special place.

#5646

Name: Bhence, Blaze

Correspondence: Please protect our National Parks. Please do not allow special interest groups (Mining, oil, and gas, etc.) to buy, build, and destroy our beautiful lands.

Thank you,

Blaze

#5647

Name: Dudda, Andreas

Correspondence: I am writing to urge the National Park Service to discontinue the grazing of beef and dairy cattle at Point Reyes National Seashore. This precious area has been damaged by livestock grazing which poses a threat to the environment and local wildlife and it should be protected and used to serve the public good, and not for the benefit of the livestock industry.

I strongly oppose Option B and any other proposal that would be fatal to Tule Elk or other wildlife to the benefit of ranching operations, and encourage the agency to adopt Option F to discontinue grazing and allow members of the public to enjoy this beautiful park and to be enriched with opportunities to visit and appreciate this special place.

Sincerely,

Andreas Dudda

#5648

Name: Cornelius, Marla

Correspondence: We need to reduce livestock not expand, this is unconscionable!

#5649

Name: Larson, Janet

Correspondence: I agree. We must protect and preserve.



#5650

Name: Adams, Jacqueline

Correspondence: I urge the NPS to end livestock grazing at Point Reyes National Park and to allow this precious land to remain as wildlife habitat and to be used for the public good, not for the benefit of the livestock industry.

I am aware that several NPS proposals include killing the native Tule Elk in order to continue grazing livestock. This is an abhorrent approach for a freaking cheese burger.

#5651

Name: Dored, L.L.

Correspondence: Enough cattle.

#5652

Name: Lindsay, Johanna

Correspondence: Leave the Tule elk alone.

#5653

Name: West, Heath

Correspondence: I am writing to urge the National Park Service to discontinue the grazing of beef and dairy cattle at Point Reyes National Seashore. This precious area has been damaged by livestock grazing which poses a threat to the environment and local wildlife and it should be protected and used to serve the public good, and not for the benefit of the livestock industry.

I strongly oppose Option B and any other proposal that would be fatal to Tule Elk or other wildlife to the benefit of ranching operations, and encourage the agency to adopt Option F to discontinue grazing and allow members of the public to enjoy this beautiful park and to be enriched with opportunities to visit and appreciate this special place.

Thank you, Heath West

#5654

Name: N/A, N/A

Correspondence: I am writing to urge the National Park Service to discontinue the grazing of beef and dairy cattle at Point Reyes National Seashore. This precious area has been damaged by livestock grazing which poses a threat to the environment and local wildlife and it should be protected and used to serve the public good, and not for the benefit of the livestock industry.

I strongly oppose Option B and any other proposal that would be fatal to Tule Elk or other wildlife to the benefit of ranching operations, and encourage the agency to adopt Option F to discontinue grazing and allow members of the public to enjoy this beautiful park and to be enriched with opportunities to visit and appreciate this special place.

#5655

Name: Waterbury, Marsha

Correspondence: I ask you, why are cattle grazing on public lands that WE are paying for? We are not getting a share of the profits from the slaughter of animals, and now you are considering the absolute stinking mess that is the cattle industry to pollute, disrupt, and murder other species just so somebody can have a hamburger. I say NO.

this is not right. This is not decent. This is a theft of land and of money from WE the TAXPAYERS. No. No. No. No.No.

Thank you for your consideration in this matter. I'm sure you will see the reasonableness of these statements. No cattle grazing on public lands. those are OURS> not THEIRS,

Sincerely,

Marsha Waterbury

#5656

Name: N/A, N/A

Correspondence: Please protect Point Reyes National Park wild habitat instead of continuing grazing livestock.

#5657

Name: Johnson, Wayne

Correspondence: Keep the polluting livestock industry out of Point Reyes

#5658

Name: Green, Jamie

Correspondence: I am writing to urge the National Park Service to discontinue the grazing of beef and dairy cattle at Point Reyes National Seashore. This precious area has been damaged by livestock grazing which poses a threat to the environment and local wildlife and it should be protected and used to serve the public good, and not for the benefit of the livestock industry.

I strongly oppose Option B and any other proposal that would be fatal to Tule Elk or other wildlife to the benefit of ranching operations, and encourage the agency to adopt Option F to discontinue grazing and allow members of the public to enjoy this beautiful park and to be enriched with opportunities to visit and appreciate this special place.

#5659

Name: NORDEMAN, VALERIE

Correspondence: Native plants and animals are more important in our national parks and forests than cattle. Even if cattle have been traditionally grazed in an area for many years, this does not make it right. Public lands are for wild animals, not for free grazing for ranchers.

#5660

Name: Shah, Nandita

Correspondence: All our national parks are public property and should not be given out to commercial interests like the dairy industry. How can it possibly be that elk are targetted to be killed in their own home to make way for the dairy cows in public land? National parks are supposed to preserve wildlife, aren't they? Please don't allow any killing of any wild animals at Point Reyes National Park or any other national park (including bison in Yellowstone for the same reason)

#5661

Name: Roberts, Gail

Correspondence: Why on earth should American tax payers support these wealthy cattle ranchers by letting their

cattle graze on publicly owned lands? No wonder they are wealthy - they are getting free food for their animals at the expense of the wild animals who Americans want to keep alive and well. Let the damn ranchers buy their own land and leave the National Lands for the animals who have a right to be there. I am so ashamed of America and the corruption and greed that is destroying this country.

#5662

Name: nagel, brandon  
Correspondence: bbb

#5663

Name: Vazquez, Ila  
Correspondence: We don't need or want livestock in our national parks, or near our marine sanctuary areas. These are jewels that need to be & stay protected from development by human beings or else they'll be destroyed forever.

#5664

Name: Sotelo, Anne  
Correspondence: I am writing to urge the National Park Service to discontinue the grazing of beef and dairy cattle at Point Reyes National Seashore. This precious area has been damaged by livestock grazing which poses a threat to the environment and local wildlife and it should be protected and used to serve the public good, and not for the benefit of the livestock industry. Cattle have damaged the natural flora, and it will be years before it can recover, with help.

I strongly oppose Option B and any other proposal that would be fatal to Tule Elk or other wildlife to the benefit of ranching operations, and encourage the agency to adopt Option F to discontinue grazing and allow members of the public to enjoy this beautiful park and to be enriched with opportunities to visit and appreciate this special place.

#5665

Name: Kerchevall, Charlene  
Correspondence: Thank You For This Opportunity. Point Reyes Is Sacred Ground. As A Former Resident Of The Bay Area, or You To Encroach On The Tule Deer and All Wildlife In Point Reyes Is Sacrilege... No More Cattle Privileges... This Is An Assault...

#5666

Name: N/A, N/A  
Correspondence: I am writing to urge the National Park Service to discontinue the grazing of beef and dairy cattle at Point Reyes National Seashore. This precious area has been damaged by livestock grazing which poses a threat to the environment and local wildlife and it should be protected and used to serve the public good, and not for the benefit of the livestock industry.

I strongly oppose Option B and any other proposal that would be fatal to Tule Elk or other wildlife to the benefit of ranching operations, and encourage the agency to adopt Option F to discontinue grazing and allow members of the public to enjoy this beautiful park and to be enriched with opportunities to visit and appreciate this special place.

#5667

Name: Baxter , Linda

Correspondence: Please protect natural lands

#5668

Name: Leflore-Huber , Elisa

Correspondence: I oppose the National Park Service's plan to kill native tule elk and expand commercial agriculture in Point Reyes National Seashore and Golden Gate National Recreation Area. Please restore those lands for the wild animals.

It is unfair that the interest of private ranchers come first.

Thank you for your consideration to this matter.

#5669

Name: Swartz, Jill

Correspondence: I am writing to urge the National Park Service to discontinue the grazing of beef and dairy cattle at Point Reyes National Seashore. This precious area has been damaged by livestock grazing which poses a threat to the environment and local wildlife and it should be protected and used to serve the public good, and not for the benefit of the livestock industry.

I strongly oppose Option B and any other proposal that would be fatal to Tule Elk or other wildlife to the benefit of ranching operations, and encourage the agency to adopt Option F to discontinue grazing and allow members of the public to enjoy this beautiful park and to be enriched with opportunities to visit and appreciate this special place.

#5670

Name: Flagg, Bob

Correspondence: The animal agriculture industry has routinely taken advantage of preferential access to land, water, and other resources, and that is currently the case in Point Reyes National Seashore in Marin County, CA. Over 5,000 cattle who are being exploited for beef and dairy production are grazing in the public park, and pose a threat to the environment, wildlife, and the public good.

The ranchers' leases are set to expire, and the National Park Service (NPS) is asking for public comments to help them determine whether or not to extend the leases or to take another approach. Shockingly, several NPS proposals include killing the native Tule Elk in order to continue grazing livestock. Please write and urge the NPS to end livestock grazing at Point Reyes National Park and to allow this precious land to remain as wildlife habitat and to be used for the public good, not for the benefit of the livestock industry.

#5671

Name: Maas, Nayomee

Correspondence: I am a citizen who has traveled to Pt. Reyes National Seashore several times a years for more than 30 years . The rule elk have become what I look forward to seeing the most. It has been heartening to observe the increase in numbers of this iconic species and look forward to a time when the elk population has returned to the historic level and distribution described by scientists. I honor the multiple-use needs of the park as long as the competing demands of the local ranching community do not impinge on the primary needs of the primary species (elk) being conserved for future generations.

The new information the EIS process must consider is the degree to which cattle numbers must be curtailed in our National Park to maximize the carrying capacity for elk. As a taxpayer, I come to see the native elk not the

introduced cattle, which I can easily observe throughout California. One dairy farm or cattle ranch, which school children and the public can visit to learn about cows and local history, is sufficient to fulfill that multiple land use in the park.

Elk and cattle compete for grass. When estimating carrying capacity for these two species, I noted that rangeland scientists project two elk for one cow. There are currently about 5,000 cattle grazing in the park, outnumbering the 500 elk ten to one. With the commonly accepted ratio of two to one, elk numbers should be encouraged to rise substantially and cattle numbers should be held to one working ranch. The livestock industry has been and continues to be subsidized at taxpayers' expense. The public's interest in wildlife and native species is at an all-time National high. National public support for cattle ranching is at a historic low. Pt. Reyes National Seashore needs to honor the mission and the supporting scientific research for expansion of elk numbers throughout the park.

#5672

Name: Barrett, Keiko

Correspondence: I am writing to urge the National Park Service to discontinue the grazing of beef and dairy cattle at Point Reyes National Seashore. This precious area has been damaged by livestock grazing which poses a threat to the environment and local wildlife and it should be protected and used to serve the public good, and not for the benefit of the livestock industry.

I strongly oppose Option B and any other proposal that would be fatal to Tule Elk or other wildlife to the benefit of ranching operations, and encourage the agency to adopt Option F to discontinue grazing and allow members of the public to enjoy this beautiful park and to be enriched with opportunities to visit and appreciate this special place.

Thank you for your consideration in this sensitive matter.

With compassion,

Keiko Barrett

#5673

Name: Harvey, Aileen

Correspondence: I am appalled every time I read an article about how the Nat. Park Service is considering killing elk in the Pt. Reyes Nat. Seashore so that they don't disturb cattle. Elk are native to the area. Cows are certainly not. Not to mention the negative impact cows have on the environment, creating green-house gasses, polluting the waterways and negatively impacting the health of the people who eat them and drink their milk...milk meant for the calves, who are taken away from their mothers.

#5674

Name: Jacobsen, Barbara

Correspondence: Please protect our beautiful Tule Elks.....don't give in to the cattle industry! Thank you, Barbara

#5675

Name: Riggelman, Nancy

Correspondence: I am writing to urge the National Park Service to discontinue the grazing of beef and dairy cattle at Point Reyes National Seashore. This precious area has been damaged by livestock grazing which poses a threat to the environment and local wildlife and it should be protected and used to serve the public good, and not for the benefit of the livestock industry.

I strongly oppose Option B and any other proposal that would be fatal to Tule Elk or other wildlife to the benefit of ranching operations, and encourage the agency to adopt Option F to discontinue grazing and allow members of the public to enjoy this beautiful park and to be enriched with opportunities to visit and appreciate this special place.

#5676

Name: Castro, Patricia

Correspondence: Please stop cattle grazing in Point Reyes. the grazing of beef and dairy cattle destroys the natural ecosystem and poses a threat to the environment, native wildlife and the public good.

I am especially concerned about Option B and any other proposal to kill the native Tule Elk or other wildlife just to benefit ranching operations.. Please adopt Option F to discourage grazing and allow this land to remain a wildlife habitat and not put it to use for the benefit of the livestock industry.

Point Reyes National Seashore is a family favorite to visit and my sisters and I love to to vacation there. It is a beautiful location and cannot be replaced or reproduced.

#5677

Name: Owen-Smith, Gail

Correspondence: I support protection of the Tule Elk in any future plans. Thank you for considering my position.

#5678

Name: Hedge, Joanne

Correspondence: Enough is enough with the cattle industry. Along with fossil fuel extraction, both contribute to what is now a climate crisis. Last time we checked, Tule Elk were useful, natural parts of the open space wild lands ecosystem. President Trump's Interior Department and the NPS are pushing in direct opposition to the park service's original mission. Species die-off is bad enough; this habitat damage is utterly wrong. Move the 5,000 cattle and cows to land zoned for agribusiness operations, and save Point Reyes National Park! Thank you.

#5679

Name: Watson, Mimi

Correspondence: Please make managing the park for the advantage of the general population of humans as well as the health an biodiversity of the animals your highest priority. The cattle grazers are NOT in anyone's best interest!

#5680

Name: Lecht, Paula

Correspondence: Please end livestock grazing at Point Reyes National Park and to allow the land to remain as wildlife habitat and to be used for the public good.

I strongly oppose Option B and any other proposal that would be fatal to Tule Elk or other wildlife to the benefit of ranching operations, and encourage the agency to adopt Option F to discontinue grazing and allow members of the public to enjoy this beautiful park and to be enriched with opportunities to visit and appreciate this special place.

#5681

Name: Tiefen, Loretta

Correspondence: Please end livestock grazing at Point Reyes National Park and to allow this precious land to remain as wildlife habitat and to be used for the public good, not for the benefit of the livestock industry.

Shockingly, several NPS proposals include killing the native Tule Elk in order to continue grazing livestock. This is not acceptable.

#5682

Name: Dunivant, Terre

Correspondence: Do not bend your knee to the ag industry.

You are the National Park Service, keepers of the public treasure. This is a sacred trust.

The Amazon is burning because cattle ranchers are always greedy for more and more resources.

Their way is not sustainable.

Do the right thing. Do not let the ranchers order your around any more. There are many, many more of us who value the land for its intrinsic worth than there are those who want a free hand to continue to exploit the land and waters.

No more.

#5683

Name: Himmel, Kerry

Correspondence: Unfukn real. Thats our govt got ya. As corrupt as ever. Always lying and renegeing on their deals. Again, just more proof our fucked up govt CANNOT BE TRUSTED. They act like they run the earth and whatever they say goes. They have NO right in the say of who should die and who should be able to live. The govt is made up of disgusting, shameful humans.

#5684

Name: N/A, N/A

Correspondence: It's called VEGAN"/PLANT N FRUIT DIET, EXAMPLE SOMEONE WHO TRULY CARES FOR THIS LIVING PLANET AND ALL OF HER GUESTS, AND WILL DEFEND THIS CONCEPT TO THE DEATH!

THIS IS MY RELIGION/SWANSONG! THIS SHOULD BE ALL HUMANS MOTIVE.

#5685

Name: Marina, Aida

Correspondence: I am submitting this comment to urge the National Park Service to discontinue the grazing of beef and dairy cattle at Point Reyes National Seashore. This precious area has long been damaged by livestock grazing which poses a threat to the environment, as well as to local wildlife, and should be protected and used to serve both the native wildlife and the public good, and No More for the benefit of the greedy and apathetic livestock industry.

I strongly oppose Option B, and any other proposal that would be fatal to Tule Elk or other wildlife, to the benefit of ranching operations. I strongly encourage the agency to adopt Option F to discontinue grazing, thus allowing

members of the public, and their descendants, to enjoy this beautiful park and be enriched with opportunities to visit and appreciate this special place over and over again.

#5686

Name: Casillas, Stella

Correspondence: The Tule Elk and the land belong to the people. They should be protected.

#5687

Name: Shulman, Joseph

Correspondence: I am writing to urge the National Park Service to discontinue the grazing of beef and dairy cattle at Point Reyes National Seashore. This precious area has been damaged by livestock grazing which poses a threat to the environment and local wildlife and it should be protected and used to serve the public good, and not for the benefit of the livestock industry.

I strongly oppose Option B and any other proposal that would be fatal to Tule Elk or other wildlife to the benefit of ranching operations, and encourage the agency to adopt Option F to discontinue grazing and allow members of the public to enjoy this beautiful park and to be enriched with opportunities to visit and appreciate this special place.

#5688

Name: Catron , Cheryl

Correspondence: Thin the heard by moving them to other places in California, not be killing them!

#5689

Name: N/A, N/A

Correspondence: I am writing to urge the National Park Service to discontinue the grazing of beef and dairy cattle at Point Reyes National Seashore. This precious area has been damaged by livestock grazing which poses a threat to the environment and local wildlife and it should be protected and used to serve the public good, and not for the benefit of the livestock industry.

I strongly oppose Option B and any other proposal that would be fatal to Tule Elk or other wildlife to the benefit of ranching operations, and encourage the agency to adopt Option F to discontinue grazing and allow members of the public to enjoy this beautiful park and to be enriched with opportunities to visit and appreciate this special place.

#5690

Name: CAPPER, NORMAN

Correspondence: I am writing to urge the National Park Service to discontinue the grazing of beef and dairy cattle at Point Reyes National Seashore. This precious area has been damaged by livestock grazing which poses a threat to the environment and local wildlife and it should be protected and used to serve the public good, and not for the benefit of the livestock industry.

I strongly oppose Option B and any other proposal that would be fatal to Tule Elk or other wildlife to the benefit of ranching operations, and encourage the agency to adopt Option F to discontinue grazing and allow members of the public to enjoy this beautiful park and to be enriched with opportunities to visit and appreciate this special place.



#5691

Name: Butler, Sam

Correspondence: Please discontinue cattle grazing at Point Reyes National Seashore to stop the damage caused by grazing to the environment, the wildlife and to the public. This is a public good and not a source of cheap fodder for livestock. It is critical that we protect public lands and stop their destruction by overuse by for-profit industry.

I am fully opposed to Option B or any other measure that would harm the Tule Elk. This park is for the benefit of the wildlife, not cattle.

#5692

Name: S., K.

Correspondence: Cattle destroy and alter natural environments. Point Reyes is a place of tremendous beauty. Please preserve it for current and future generations. Remove the cattle and let the native wildlife thrive. Biodiversity helps us all.

#5693

Name: Winnick, Karen

Correspondence: I am writing to urge the National Park Service to discontinue the grazing of beef and dairy cattle at Point Reyes National Seashore. This precious area has been damaged by livestock grazing which poses a threat to the environment and local wildlife and it should be protected and used to serve the public good, and not for the benefit of the livestock industry.

I strongly oppose Option B and any other proposal that would be fatal to Tule Elk or other wildlife to the benefit of ranching operations, and encourage the agency to adopt Option F to discontinue grazing and allow members of the public to enjoy this beautiful park and to be enriched with opportunities to visit and appreciate this special place.

#5694

Name: N/A, N/A

Correspondence: I am writing to urge the National Park Service to discontinue the grazing of beef and dairy cattle at Point Reyes National Seashore. This precious area has been damaged by livestock grazing which poses a threat to the environment and local wildlife and it should be protected and used to serve the public good, and not for the benefit of the livestock industry.

I strongly oppose Option B and any other proposal that would be fatal to Tule Elk or other wildlife to the benefit of ranching operations, and encourage the agency to adopt Option F to discontinue grazing and allow members of the public to enjoy this beautiful park and to be enriched with opportunities to visit and appreciate this special place.

#5695

Name: Allen, Ann

Correspondence: Thank please consider the many reasons for returning Pt Reyes National Seashore back to wildlife, the tule elk. There are many reasons, presented to you for now renewing to farming interests. Let us all enjoy the area. Thank you, Ann Allen

#5696

Name: Meyer, Lisa

Correspondence: I am writing to urge the National Park Service to discontinue the grazing of beef and dairy cattle at Point Reyes National Seashore. This precious area has been damaged by livestock grazing which poses a threat to the environment and local wildlife and it should be protected and used to serve the public good, and not for the benefit of the livestock industry.

I strongly oppose Option B and any other proposal that would be fatal to Tule Elk or other wildlife to the benefit of ranching operations, and encourage the agency to adopt Option F to discontinue grazing and allow members of the public to enjoy this beautiful park and to be enriched with opportunities to visit and appreciate this special place.

#5697

Name: Lewis, O

Correspondence: I am writing to urge the National Park Service to discontinue the grazing of beef and dairy cattle at Point Reyes National Seashore. This precious area has been damaged by livestock grazing which poses a threat to the environment and local wildlife and it should be protected and used to serve the public good, and not for the benefit of the livestock industry.

I strongly oppose Option B and any other proposal that would be fatal to Tule Elk or other wildlife to the benefit of ranching operations, and encourage the agency to adopt Option F to discontinue grazing and allow members of the public to enjoy this beautiful park and to be enriched with opportunities to visit and appreciate this special place.

#5698

Name: De Lafontaine, Erin

Correspondence: I am writing to urge the National Park Service to discontinue the grazing of beef and dairy cattle at Point Reyes National Seashore. This precious area has been damaged by livestock grazing which poses a threat to the environment and local wildlife and it should be protected and used to serve the public good, and not for the benefit of the livestock industry.

I strongly oppose Option B and any other proposal that would be fatal to Tule Elk or other wildlife to the benefit of ranching operations, and encourage the agency to adopt Option F to discontinue grazing and allow members of the public to enjoy this beautiful park and to be enriched with opportunities to visit and appreciate this special place.

#5699

Name: Papp, Zoltan

Correspondence: We all want to treat our animals well. Special when we raised them for food. Base of healthy food is , a happy and healthy animal. Properly raised them . If the food industry not be able rich that goal we have to find other alternative.

#5700

Name: N/A, N/A

Correspondence: I am writing to urge the National Park Service to discontinue the grazing of beef and dairy cattle at Point Reyes National Seashore. This precious area has been damaged by livestock grazing which poses a threat to the environment and local wildlife and it should be protected and used to serve the public good, and not for the benefit of the livestock industry.

I strongly oppose Option B and any other proposal that would be fatal to Tule Elk or other wildlife to the benefit of ranching operations, and encourage the agency to adopt Option F to discontinue grazing and allow members of

the public to enjoy this beautiful park and to be enriched with opportunities to visit and appreciate this special place.

#5701

Name: Kuklenski, Julie

Correspondence: Please save the habitat for wildlife NOT cattle.

#5702

Name: Hennebury, Wayne

Correspondence: I am writing to urge the National Park Service to discontinue the grazing of beef and dairy cattle at Point Reyes National Seashore. This precious area has been damaged by livestock grazing which poses a threat to the environment and local wildlife and it should be protected and used to serve the public good, and not for the benefit of the livestock industry.

I strongly oppose Option B and any other proposal that would be fatal to Tule Elk or other wildlife to the benefit of ranching operations, and encourage the agency to adopt Option F to discontinue grazing and allow members of the public to enjoy this beautiful park and to be enriched with opportunities to visit and appreciate this special place.

#5703

Name: Sobelson, Mark

Correspondence: I am writing to urge the National Park Service to discontinue the grazing of beef and dairy cattle at Point Reyes National Seashore. This precious area has been damaged by livestock grazing which poses a threat to the environment and local wildlife and it should be protected and used to serve the public good, and not for the benefit of the livestock industry.

I strongly oppose Option B and any other proposal that would be fatal to Tule Elk or other wildlife to the benefit of ranching operations, and encourage the agency to adopt Option F to discontinue grazing and allow members of the public to enjoy this beautiful park and to be enriched with opportunities to visit and appreciate this special place.

#5704

Name: Gnatek, Timothy

Correspondence: I'm writing to plea for expanded access to bicycles in the Point Reyes National Seashore. I am not a cyclist, however as an active hiker and runner on many public lands both here in Marin County and abroad I have the full confidence that bicyclists are fellow users of the park who should be welcomed and encouraged to participate in accessing these lands. I have many friendly interactions with cyclists and in my experience, increasing access to this user group only expands their engagement as stakeholders and willingness to advocate for more pressing matters affecting all us who hold these lands dear, including conservation and preservation.

In particular, bicycle access in Point Reyes is extremely limited compared to hikers and equestrians, and there are many immediate access points on RANCH ROADS that would not only create a more equal opportunity for these users, but also create important connector paths that can make cycling legitimate and safe for traveling through the park.

I believe these are sensible and conservative offers to provide riders with park access:

A connection between Devil's Gulch and Platform Bridge Road using existing ranch roads.

A connection between Bolinas Ridge Trail at Olema Hill and Point Reyes Station to serve as an interim connection for the Cross Marin Trail.

A connection between Bolinas Ridge Trail and Five Brooks Stables using existing ranch roads.

A connection between Drakes Estero and Abbotts Lagoon Trail using existing ranch roads.

A connection between Marshall Beach Trailhead and Pierce Point Road using existing ranch roads.

An Estero Trail loop using existing ranch roads.

Collaboration with ranchers and other stakeholders to educate the public and address concerns related to public access on working ranch lands.

I look forward to increasingly sharing my park visits with more cyclists.

Thank you for your attention.

Tim Gnatek

#5705

Name: N/A, N/A

Correspondence: Please STOP the animal agriculture en route to Point Reyes and save the natural beauty for all the visitors.

#5706

Name: Sullivan, Tad

Correspondence: I am writing to urge the National Park Service to discontinue the grazing of beef and dairy cattle at Point Reyes National Seashore. This precious area has been damaged by livestock grazing which poses a threat to the environment and local wildlife and it should be protected and used to serve the public good, and not for the benefit of the livestock industry.

I strongly oppose Option B and any other proposal that would be fatal to Tule Elk or other wildlife to the benefit of ranching operations, and encourage the agency to adopt Option F to discontinue grazing and allow members of the public to enjoy this beautiful park and to be enriched with opportunities to visit and appreciate this special place.

We need to protect our public spaces which are inseparable from the life within them. To kill life for private profit is damaging to us all.

Thank you,

Tad Sullivan

#5707

Name: Albright, Faith

Correspondence: I am writing to urge the National Park Service to discontinue the grazing of beef and dairy cattle

at Point Reyes National Seashore. This precious area has been damaged by livestock grazing which poses a threat to the environment and local wildlife and it should be protected and used to serve the public good, and not for the benefit of the livestock industry.

I strongly oppose Option B and any other proposal that would be fatal to Tule Elk or other wildlife to the benefit of ranching operations, and encourage the agency to adopt Option F to discontinue grazing and allow members of the public to enjoy this beautiful park and to be enriched with opportunities to visit and appreciate this special place.

#5708

Name: N/A, N/A

Correspondence: I am writing to urge the National Park Service to disallow the continued grazing of beef and dairy cattle at Point Reyes National Seashore. Point Reyes is a national treasure that must be protected and used to serve the public good, and not for the benefit of the livestock industry.

I strongly oppose Option B and any other proposal that would be fatal to Tule Elk or other wildlife. I encourage the agency to adopt Option F to discontinue grazing and allow members of the public to enjoy this beautiful park and to be enriched with opportunities to visit and appreciate this special place.

#5709

Name: Jacobs , Suzanne

Correspondence: As a taxpayer, I am tired of handing out subsidies by way of public lands to support ranching, an unsustainable and environmental hazard, especially at the cost of native wildlife like elk. Please do not renew grazing rights!!

#5710

Name: N/A, melinda

Correspondence: We must be a voice for the voiceless - please let the glory of Marin county continue to include the local elk populations. They were here first and they deserve their homes as much as we deserve ours.

#5711

Name: ,

Correspondence: I am writing to urge the National Park Service to discontinue the grazing of beef and dairy cattle at Point Reyes National Seashore. This precious area has been damaged by livestock grazing which poses a threat to the environment and local wildlife and it should be protected and used to serve the public good, and not for the benefit of the livestock industry.

I strongly oppose Option B and any other proposal that would be fatal to Tule Elk or other wildlife to the benefit of ranching operations, and encourage the agency to adopt Option F to discontinue grazing and allow members of the public to enjoy this beautiful park and to be enriched with opportunities to visit and appreciate this special place.

#5712

Name: Braunschweig, Breeze

Correspondence: I am writing to urge the National Park Service to discontinue the grazing of beef and dairy cattle at Point Reyes National Seashore. This precious area has been damaged by livestock grazing which poses a threat to the environment and local wildlife and it should be protected and used to serve the public good, and not for the benefit of the livestock industry.

I strongly oppose Option B and any other proposal that would be fatal to Tule Elk or other wildlife to the benefit of ranching operations, and encourage the agency to adopt Option F to discontinue grazing and allow members of the public to enjoy this beautiful park and to be enriched with opportunities to visit and appreciate this special place.

#5713

Name: N/A, N/A

Correspondence: I am writing to urge the National Park Service to discontinue the grazing of beef and dairy cattle at Point Reyes National Seashore. This precious area has been damaged by livestock grazing which poses a threat to the environment and local wildlife and it should be protected and used to serve the public good, and not for the benefit of the livestock industry.

I strongly oppose Option B and any other proposal that would be fatal to Tule Elk or other wildlife to the benefit of ranching operations, and encourage the agency to adopt Option F to discontinue grazing and allow members of the public to enjoy this beautiful park and to be enriched with opportunities to visit and appreciate this special place.

#5714

Name: Scheidt, Nancy

Correspondence: September 19, 2019

Dear Stewards of our native flora and fauna,

I am writing to urge the National Park Service to discontinue the grazing of beef and dairy cattle at Point Reyes National Seashore. This precious area has been damaged by livestock grazing which poses a threat to the environment and local wildlife and it should be protected and used to serve the public good, and not for the benefit of the livestock industry.

I strongly oppose Option B and any other proposal that would be fatal to Tule Elk or other wildlife to the benefit of ranching operations, and encourage the agency to adopt Option F to discontinue grazing and allow members of the public to enjoy this beautiful park and to be enriched with opportunities to visit and appreciate this special place.

Please protect our priceless legacy. Thank you for giving this responsibility serious consideration.

Sincerely Yours,

Nancy Scheidt

#5715

Name: Drabecki, Rachel

Correspondence: I am writing to urge the National Park Service to discontinue the grazing of beef and dairy cattle at Point Reyes National Seashore. This precious area has been damaged by livestock grazing which poses a threat to the environment and local wildlife and it should be protected and used to serve the public good, and not for the benefit of the livestock industry.

I strongly oppose Option B and any other proposal that would be fatal to Tule Elk or other wildlife to the benefit of ranching operations, and encourage the agency to adopt Option F to discontinue grazing and allow members of the public to enjoy this beautiful park and to be enriched with opportunities to visit and appreciate this special place.

#5716

Name: Mellen, Linda

Correspondence: Do not allow cattle grazing on public grounds. allow the Wild animals the flora the fauna to thrive

#5717

Name: Naser, Gida

Correspondence: We all need to save the wildlife and parks

#5718

Name: N/A, N/A

Correspondence: I am writing to urge the National Park Service to discontinue the grazing of beef and dairy cattle at Point Reyes National Seashore. This precious area has been damaged by livestock grazing which poses a threat to the environment and local wildlife and it should be protected and used to serve the public good, and not for the benefit of the livestock industry.

I strongly oppose Option B and any other proposal that would be fatal to Tule Elk or other wildlife to the benefit of ranching operations, and encourage the agency to adopt Option F to discontinue grazing and allow members of the public to enjoy this beautiful park and to be enriched with opportunities to visit and appreciate this special place.

#5719

Name: Matsuo, June

Correspondence: I am writing to urge the National Park Service to discontinue the grazing of beef and dairy cattle at Point Reyes National Seashore. This precious area has been damaged by livestock grazing which poses a threat to the environment and local wildlife and it should be protected and used to serve the public good, and not for the benefit of the livestock industry.

I strongly oppose Option B and any other proposal that would be fatal to Tule Elk or other wildlife to the benefit of ranching operations, and encourage the agency to adopt Option F to discontinue grazing and allow members of the public to enjoy this beautiful park and to be enriched with opportunities to visit and appreciate this special place.

#5720

Name: N/A, Eric

Correspondence: National Parks should be kept as close to their original natural state as possible, while allowing reasonable access to members of the public. Under no circumstances should National Park land be used for private or corporate profit while simultaneously limiting public access. There had already been you much damage done to our nation and or environment.

To that end, I am writing to urge the National Park Service to work to discontinue the grazing of beef and dairy cattle at Point Reyes National Seashore. This precious area has been damaged by livestock grazing which poses a threat to the environment and local wildlife. It should be protected and used to serve the public good, and not for the benefit of the livestock industry. For too long much of Point Reyes has been cut off from public access and wildlife had been threatened.

Particularly, I strongly oppose Option B and any other proposal that would be fatal to Tule Elk or other wildlife to the benefit of ranching operations, and encourage the agency to adopt Option F to discontinue grazing and allow

members of the public to enjoy this beautiful park and to be enriched with opportunities to visit and appreciate this special place.

Thank you.

#5721

Name: N/A, N/A

Correspondence: I am writing to urge the National Park Service to discontinue the grazing of beef and dairy cattle at Point Reyes National Seashore. This precious area has been damaged by livestock grazing which poses a threat to the environment and local wildlife and it should be protected and used to serve the public good, and not for the benefit of the livestock industry.

I strongly oppose Option B and any other proposal that would be fatal to Tule Elk or other wildlife to the benefit of ranching operations, and encourage the agency to adopt Option F to discontinue grazing and allow members of the public to enjoy this beautiful park and to be enriched with opportunities to visit and appreciate this special place.

#5722

Name: Rettig, Karin

Correspondence: I am writing to urge the National Park Service to discontinue the grazing of beef and dairy cattle at Point Reyes National Seashore. This precious area has been damaged by livestock grazing which poses a threat to the environment and local wildlife and it should be protected and used to serve the public good, and not for the benefit of the livestock industry.

I strongly oppose Option B and any other proposal that would be fatal to Tule Elk or other wildlife to the benefit of ranching operations, and encourage the agency to adopt Option F to discontinue grazing and allow members of the public to enjoy this beautiful park and to be enriched with opportunities to visit and appreciate this special place.

#5723

Name: Baker, Ann

Correspondence: It is completely absurd to protect cows over native elk in a NATIONAL SEASHORE! The natural environment should be preserved, not someone's commercial enterprise.

#5724

Name: Flack, Doug

Correspondence: I am writing to urge the National Park Service to discontinue the grazing of beef and dairy cattle at Point Reyes National Seashore. This precious area has been damaged by livestock grazing which poses a threat to the environment and local wildlife and it should be protected and used to serve the public good, and not for the benefit of the livestock industry.

I strongly oppose Option B and any other proposal that would be fatal to Tule Elk or other wildlife to the benefit of ranching operations, and encourage the agency to adopt Option F to discontinue grazing and allow members of the public to enjoy this beautiful park and to be enriched with opportunities to visit and appreciate this special place.

#5725

Name: Burke, Frank



Correspondence: I am writing to urge the National Park Service to discontinue the grazing of beef and dairy cattle at Point Reyes National Seashore. This precious area has been damaged by livestock grazing which poses a threat to the environment and local wildlife and it should be protected and used to serve the public good, and not for the benefit of the livestock industry.

I strongly oppose Option B and any other proposal that would be fatal to Tule Elk or other wildlife to the benefit of ranching operations, and encourage the agency to adopt Option F to discontinue grazing and allow members of the public to enjoy this beautiful park and to be enriched with opportunities to visit and appreciate this special place.

#5726

Name: N/A, N/A

Correspondence: Working farms are an educational tool for the many children in Bay Area cities and suburbs who have never set foot on a farm. Children can learn how the ranches and farms in the Point Reyes National Seashore benefit the local economy, and what it means to work the land responsibly.

#5727

Name: Chin, Michael

Correspondence: I am writing in response to a report that the National Park Service is considering shooting up to 15 tule elk per year to appease ranchers who want to graze livestock on public lands. The park belongs to the American people, not private entities. We visit Point Reyes to observe its wildlife and take in its natural beauty. The reintroduction and reestablishment of tule elk in the preserve is a great success story. Don't ruin it.

#5728

Name: Humrich, Gilia

Correspondence: Leave the Elk alone; they deserve to live their lives in peace. We need them.

#5729

Name: N/A, N/A

Correspondence: Please save the wildlife!

#5730

Name: N/A, N/A

Correspondence: I am writing to urge the National Park Service to discontinue the grazing of beef and dairy cattle at Point Reyes National Seashore. This precious area has been damaged by livestock grazing which poses a threat to the environment and local wildlife and it should be protected and used to serve the public good, and not for the benefit of the livestock industry.

I strongly oppose Option B and any other proposal that would be fatal to Tule Elk or other wildlife to the benefit of ranching operations, and encourage the agency to adopt Option F to discontinue grazing and allow members of the public to enjoy this beautiful park and to be enriched with opportunities to visit and appreciate this special place.

#5731

Name: Balocating, Samuel

Correspondence: The Tule Elk is such a beautiful animal and to know that their habitat and livelihood is being threatened is a sad sad day. Who knows how many will remain in the future?

The agriculture industry is already large enough and we do not need to hurt one set of species to make room for another.

The environment, pollution, wildlife will be severely affected. Let us not threaten anymore the fragile ecosystem and wildlife habitat that have roamed there for ages.

May we now continue with future generations enjoy these majestic creatures, let us be able to visit them with our families, school activity field trips, and only one trekkers be able to see these lovely Tule Elks and others in their full glory at peace with one and nature. In turn, giving us humans the same peace we observe from them.

-Samuel

#5732

Name: James, Jenni

Correspondence: I am writing to urge the National Park Service to discontinue the grazing of beef and dairy cattle at Point Reyes National Seashore. This precious area has been damaged by livestock grazing which poses a threat to the environment and local wildlife and it should be protected and used to serve the public good, and not for the benefit of the livestock industry.

I strongly oppose Option B and any other proposal that would be fatal to Tule Elk or other wildlife to the benefit of ranching operations, and encourage the agency to adopt Option F to discontinue grazing and allow members of the public to enjoy this beautiful park and to be enriched with opportunities to visit and appreciate this special place.

#5733

Name: N/A, N/A

Correspondence: Please let us enjoy the beautiful landscapes and grasslands instead of having to look at animals whose days are numbered to be slaughtered while on our way to Point Reyes.

#5734

Name: Mendoza , Miranda

Correspondence: I am writing to urge the National Park Service to discontinue the grazing of beef and dairy cattle at Point Reyes National Seashore. This precious area has been damaged by livestock grazing which poses a threat to the environment and local wildlife and it should be protected and used to serve the public good, and not for the benefit of the livestock industry.

I strongly oppose Option B and any other proposal that would be fatal to Tule Elk or other wildlife to the benefit of ranching operations, and encourage the agency to adopt Option F to discontinue grazing and allow members of the public to enjoy this beautiful park and to be enriched with opportunities to visit and appreciate this special place.

#5735

Name: Barrett, Heather

Correspondence: I am a citizen who has traveled to Pt. Reyes National Seashore several times a years for more than 15 years with family and friends to view the Tule Elk. It has been heartening to observe the increase in numbers of this iconic species and look forward to a time when the elk population has returned to the historic level and distribution described by scientists. I honor the multiple-use needs of the park as long as the competing demands of the local ranching community do not impinge on the primary needs of the primary species (elk) being conserved for future generations.

The new information the EIS process must consider is the degree to which cattle numbers must be curtailed in our National Park to maximize the carrying capacity for elk. As a taxpayer, I come to see the native elk not the introduced cattle, which I can easily observe throughout California. One dairy farm or cattle ranch, which school children and the public can visit to learn about cows and local history, is sufficient to fulfill that multiple land use in the park.

Elk and cattle compete for grass. When estimating carrying capacity for these two species, I noted that rangeland scientists project two elk for one cow. There are currently about 5,000 cattle grazing in the park, outnumbering the 500 elk ten to one. With the commonly accepted ratio of two to one, elk numbers should be encouraged to rise substantially and cattle numbers should be held to one working ranch. The livestock industry has been and continues to be subsidized at taxpayers' expense. The public's interest in wildlife and native species is at an all-time National high. National public support for cattle ranching is at an historic low. Pt. Reyes National Seashore needs to honor the mission and the supporting scientific research for expansion of elk numbers throughout the park.

#5736

Name: rolstone, darrell

Correspondence: Beef cattle can be raised anywhere....whereas the Tule Elk are very delicate and need their own natural environment. Please work toward a "harmony" with nature.....and not just the financial benefits of a few individuals! Thank you! Darrell Rolstone

#5737

Name: Smith, Joan

Correspondence: The livestock industry is particularly damaging to the environment. The area of Point Reyes must be protected and preserved. We cannot depend on industry and corporate farming practices to protect our land, water and air. We know that the cattle and dairy industry is the biggest contributor to methane production and climate disruption. We do not need such industry in Point Reyes.

#5738

Name: Bobek, Lu

Correspondence: Keep the Tule Elk, stop the cattle grazing.

#5739

Name: Adams, Reade

Correspondence: Please adopt Alternative F, which would discontinue farming and ranching opportunities in the park and expand visitor opportunities. The preservation of native wild species must take precedence over farming and ranching activities. Grazing negatively affects ecosystems, causing water pollution and soil erosion, spreading invasive species and disease, and harming endangered species. Please support Alternative F.

#5740

Name: Jones, Susan

Correspondence: Save precious wildlife. Do not pander to the destructive ranching industry. Move forward with preservation. Thank you.

#5741

Name: schuck, jacqueline

Correspondence: To whom it may concern,

I urge you not to renew and or extent the ranchers' leases and killing beautiful and native Tule Elk in order to continue grazing livestock is barbaric and outdated with what people that support national parks want.

I am writing to urge you to end livestock grazing at Point Reyes National Park and to allow this precious land to remain as wildlife habitat and to be used for the public good, not for the benefit of the livestock industry. The animal agriculture industry has routinely taken advantage of preferential access to land, water, and other resources for decades and currently over 5,000 cattle who are being exploited for beef and dairy production are grazing in the public park, and pose a threat to the environment, wildlife, and the public good.

Sincerely,

Jacqueline Schuck

#5742

Name: Desmond, Sheila

Correspondence: I am writing to urge the National Park Service to discontinue the grazing of beef and dairy cattle at Point Reyes National Seashore. This precious area has been damaged by livestock grazing which poses a threat to the environment and local wildlife and it should be protected and used to serve the public good, and not for the benefit of the livestock industry.

I strongly oppose Option B and any other proposal that would be fatal to Tule Elk or other wildlife to the benefit of ranching operations, and encourage the agency to adopt Option F to discontinue grazing of livestock and allow members of the public to enjoy this beautiful park and to be enriched with opportunities to visit and appreciate this special place.

Thank you.

#5743

Name: Dorr, Kathy

Correspondence: The US doesn't need any more space to breed and torture farm animals. Leave this beautiful land alone.

#5744

Name: Hawkins, Analicia

Correspondence: I am writing to urge the National Park Service to discontinue the grazing of beef and dairy cattle at Point Reyes National Seashore. This precious area has been damaged by livestock grazing which poses a threat to the environment and local wildlife and it should be protected and used to serve the public good, and not for the benefit of the livestock industry.

I strongly oppose Option B and any other proposal that would be fatal to Tule Elk or other wildlife to the benefit of ranching operations, and encourage the agency to adopt Option F to discontinue grazing and allow members of the public to enjoy this beautiful park and to be enriched with opportunities to visit and appreciate this special place.

#5745

Name: Gourley, Justin

Correspondence: I am writing to urge the National Park Service to discontinue the grazing of beef and dairy cattle at Point Reyes National Seashore. This precious area has been damaged by livestock grazing which poses a threat

to the environment and local wildlife and it should be protected and used to serve the public good, and not for the benefit of the livestock industry.

I strongly oppose Option B and any other proposal that would be fatal to Tule Elk or other wildlife to the benefit of ranching operations, and encourage the agency to adopt Option F to discontinue grazing and allow members of the public to enjoy this beautiful park and to be enriched with opportunities to visit and appreciate this special place.

#5746

Name: Darovic, Elizabeth

Correspondence: I am writing to urge the National Park Service to discontinue the grazing of beef and dairy cattle at Point Reyes National Seashore. This precious area has been damaged by livestock grazing which poses a threat to the environment and local wildlife and it should be protected and used to serve the public good, and not for the benefit of the livestock industry.

I strongly oppose Option B and any other proposal that would be fatal to Tule Elk or other wildlife to the benefit of ranching operations, and encourage the agency to adopt Option F to discontinue grazing and allow members of the public to enjoy this beautiful park and to be enriched with opportunities to visit and appreciate this special place.

#5747

Name: Hopkins, Dennis and Andrea

Correspondence: Please don't let cattle grazing take over Point Reyes and crowd out the Tule Elk! We love going up there for visits. It's a beautiful wild place but thousands of cattle grazing there would change all that.

#5748

Name: Willis, Sharman

Correspondence: I am writing to urge the National Park Service to discontinue the grazing of beef and dairy cattle at Point Reyes National Seashore. This precious area has been damaged by livestock grazing which poses a threat to the environment and local wildlife and it should be protected and used to serve the public good, and not for the benefit of the livestock industry.

I strongly oppose Option B and any other proposal that would be fatal to Tule Elk or other wildlife to the benefit of ranching operations, and encourage the agency to adopt Option F to discontinue grazing and allow members of the public to enjoy this beautiful park and to be enriched with opportunities to visit and appreciate this special place.

#5749

Name: N/A, N/A

Correspondence: I am writing to urge the National Park Service to discontinue the grazing of beef and dairy cattle at Point Reyes National Seashore. This precious area has been damaged by livestock grazing which poses a threat to the environment and local wildlife and it should be protected and used to serve the public good, and not for the benefit of the livestock industry.

I strongly oppose Option B and any other proposal that would be fatal to Tule Elk or other wildlife to the benefit of ranching operations, and encourage the agency to adopt Option F to discontinue grazing and allow members of the public to enjoy this beautiful park and to be enriched with opportunities to visit and appreciate this special place.

#5750

Name: Reale, Richard

Correspondence: Please end livestock grazing at Point Reyes National Park and allow this precious land to remain as wildlife habitat and to be used for the public good, not for the benefit of the livestock industry.

#5751

Name: Cofresi, Shirley

Correspondence: I am writing to urge the National Park Service to discontinue the grazing of beef and dairy cattle at Point Reyes National Seashore. This precious area has been damaged by livestock grazing which poses a threat to the environment and local wildlife and it should be protected and used to serve the public good, and not for the benefit of the livestock industry.

I strongly oppose Option B and any other proposal that would be fatal to Tule Elk or other wildlife to the benefit of ranching operations, and encourage the agency to adopt Option F to discontinue grazing and allow members of the public to enjoy this beautiful park and to be enriched with opportunities to visit and appreciate this special place.

The MAJORITY of Americans say NO to more cattle or domestic herd grazing on OUR public lands. You have an obligation to listen!

#5752

Name: N/A, N/A

Correspondence: I am writing to urge the National Park Service to discontinue the grazing of beef and dairy cattle at Point Reyes National Seashore. This precious area has been damaged by livestock grazing which poses a threat to the environment and local wildlife and it should be protected and used to serve the public good, and not for the benefit of the livestock industry.

I strongly oppose Option B and any other proposal that would be fatal to Tule Elk or other wildlife to the benefit of ranching operations, and encourage the agency to adopt Option F to discontinue grazing and allow members of the public to enjoy this beautiful park and to be enriched with opportunities to visit and appreciate this special place.

#5753

Name: N/A, N/A

Correspondence: I am writing to urge the National Park Service to discontinue the grazing of beef and dairy cattle at Point Reyes National Seashore. This precious area has been damaged by livestock grazing which poses a threat to the environment and local wildlife and it should be protected and used to serve the public good, and not for the benefit of the livestock industry.

I strongly oppose Option B and any other proposal that would be fatal to Tule Elk or other wildlife to the benefit of ranching operations, and encourage the agency to adopt Option F to discontinue grazing and allow members of the public to enjoy this beautiful park and to be enriched with opportunities to visit and appreciate this special place.

#5754

Name: Barraza, Anna

Correspondence: I am writing to urge the National Park Service to discontinue the grazing of beef and dairy cattle at Point Reyes National Seashore. This precious area has been damaged by livestock grazing which poses a threat

to the environment and local wildlife and it should be protected and used to serve the public good, and not for the benefit of the livestock industry.

I strongly oppose Option B and any other proposal that would be fatal to Tule Elk or other wildlife to the benefit of ranching operations, and encourage the agency to adopt Option F to discontinue grazing and allow members of the public to enjoy this beautiful park and to be enriched with opportunities to visit and appreciate this special place.

#5755

Name: N/A, N/A

Correspondence: I am writing to urge the National Park Service to discontinue the grazing of beef and dairy cattle at Point Reyes National Seashore. This precious area has been damaged by livestock grazing which poses a threat to the environment and local wildlife and it should be protected and used to serve the public good, and not for the benefit of the livestock industry.

I strongly oppose Option B and any other proposal that would be fatal to Tule Elk or other wildlife to the benefit of ranching operations, and encourage the agency to adopt Option F to discontinue grazing and allow members of the public to enjoy this beautiful park and to be enriched with opportunities to visit and appreciate this special place.

#5756

Name: Jurado, Jason

Correspondence: Nature over commerce. Please don't let money continue to skew our view.

#5757

Name: George, Catherine

Correspondence: I am writing to urge the National Park Service to discontinue the grazing of beef and dairy cattle at Point Reyes National Seashore. This precious area has been damaged by livestock grazing which poses a threat to the environment and local wildlife and it should be protected and used to serve the public good, and not for the benefit of the livestock industry.

I strongly oppose Option B and any other proposal that would be fatal to Tule Elk or other wildlife to the benefit of ranching operations, and encourage the agency to adopt Option F to discontinue grazing and allow members of the public to enjoy this beautiful park and to be enriched with opportunities to visit and appreciate this special place.

#5758

Name: benton, annette

Correspondence: Please keep the wild animals safe and in the wild!

#5759

Name: S, George

Correspondence: I am writing to urge the National Park Service to discontinue the grazing of beef and dairy cattle at Point Reyes National Seashore. This precious area has been damaged by livestock grazing which poses a threat to the environment and local wildlife and it should be protected and used to serve the public good, and not for the benefit of the livestock industry.

I strongly oppose Option B and any other proposal that would be fatal to Tule Elk or other wildlife to the benefit of ranching operations, and encourage the agency to adopt Option F to discontinue grazing and allow members of the public to enjoy this beautiful park and to be enriched with opportunities to visit and appreciate this special place.

#5760

Name: Chinn, Karen

Correspondence: I am writing to urge the National Park Service to discontinue the grazing of beef and dairy cattle at Point Reyes National Seashore. This precious area has been damaged by livestock grazing which poses a threat to the environment and local wildlife and it should be protected and used to serve the public good, and not for the benefit of the livestock industry.

I strongly oppose Option B and any other proposal that would be fatal to Tule Elk or other wildlife to the benefit of ranching operations, and encourage the agency to adopt Option F to discontinue grazing and allow members of the public to enjoy this beautiful park and to be enriched with opportunities to visit and appreciate this special place.

#5761

Name: Crase, Steven

Correspondence: I am writing to urge the National Park Service to discontinue the grazing of beef and dairy cattle at Point Reyes National Seashore. This precious area has been damaged by livestock grazing which poses a threat to the environment and local wildlife and it should be protected and used to serve the public good, and not for the benefit of the livestock industry.

I strongly oppose Option B and any other proposal that would be fatal to Tule Elk or other wildlife to the benefit of ranching operations, and encourage the agency to adopt Option F to discontinue grazing and allow members of the public to enjoy this beautiful park and to be enriched with opportunities to visit and appreciate this special place.

#5762

Name: Kind, Pamela

Correspondence: I am writing to urge the National Park Service to discontinue the grazing of beef and dairy cattle at Point Reyes National Seashore. This precious area has been damaged by livestock grazing which poses a threat to the environment and local wildlife and it should be protected and used to serve the public good, and not for the benefit of the livestock industry.

I strongly oppose Option B and any other proposal that would be fatal to Tule Elk or other wildlife to the benefit of ranching operations, and encourage the agency to adopt Option F to discontinue grazing and allow members of the public to enjoy this beautiful park and to be enriched with opportunities to visit and appreciate this special place.

#5763

Name: Chinn, Jeanne

Correspondence: I vote Alternative F - NO RANCHING.

Please take the cattle out of Pt. Reyes Na Seashore, take the fencing out, and it is time to let the Elk roam free of the hazing, yearly killing, and suffering caused by ranchers and farmers over way too much time. An agreement had been made, the NPS needs to back up their original agreement - 25 years has far passed and it is time now for ranching to leave and open the gates for the Elk to roam free. Do Not bring in more livestock. Do Not bring in



agriculture. This is Public Trust Lands, it is a place for wildlife to live in peace, and for our generations and future generations to enjoy the freedom of wildlife on their habitat. I vote ALTERNATIVE F - NO RANCHING Thank you, Jeanne Wetzel Chinn

#5764

Name: FORISTER, KRISTIN

Correspondence: Dear NPS,

I am writing to urge the National Park Service to discontinue the grazing of beef and dairy cattle at Point Reyes National Seashore. This precious area has been damaged by livestock grazing which poses a threat to the environment and local wildlife and it should be protected and used to serve the public good, and not for the benefit of the livestock industry.

I strongly oppose Option B and any other proposal that would be fatal to Tule Elk or other wildlife to the benefit of ranching operations, and encourage the agency to adopt Option F to discontinue grazing and allow members of the public to enjoy this beautiful park and to be enriched with opportunities to visit and appreciate this special place.

Thank you, Kristin Forister

#5765

Name: Morgaridge, Jeanne

Correspondence: I am writing to urge the National Park Service to discontinue the grazing of beef and dairy cattle at Point Reyes National Seashore. This precious area has been damaged by livestock grazing which poses a threat to the environment and local wildlife and it should be protected and used to serve the public good, and not for the benefit of the livestock industry.

I strongly oppose Option B and any other proposal that would be fatal to Tule Elk or other wildlife to the benefit of ranching operations, and encourage the agency to adopt Option F to discontinue grazing and allow members of the public to enjoy this beautiful park and to be enriched with opportunities to visit and appreciate this special place.

#5766

Name: Gillmeister , Susan

Correspondence: Let this be a sanctuary for the elk

#5767

Name: Vaughn, Amy

Correspondence: Please end livestock grazing at Point Reyes National Park and allow this precious land to remain as wildlife habitat, to be used for the public good, not for the benefit of the livestock industry.

Thank you -

Amy Vaughn

#5768

Name: N/A, N/A

Correspondence: I am writing to urge the National Park Service to discontinue the grazing of beef and dairy cattle

at Point Reyes National Seashore. This precious area has been damaged by livestock grazing which poses a threat to the environment and local wildlife and it should be protected and used to serve the public good, and not for the benefit of the livestock industry.

I strongly oppose Option B and any other proposal that would be fatal to Tule Elk or other wildlife to the benefit of ranching operations, and encourage the agency to adopt Option F to discontinue grazing and allow members of the public to enjoy this beautiful park and to be enriched with opportunities to visit and appreciate this special place.

#5769

Name: Elliott, Vincent

Correspondence: This is a national park, not a ranch. The cows can go somewhere else. We need to eat less beef anyway.

#5770

Name: Goldberg, Paula

Correspondence: To The Commission,

Please do not kill wildlife and the Tule Elk to make way for farm animals grazing. Please do not change or destroy this natural beauty and balance. Please keep California naturally beautiful and protect its wildlife animal population,

Thank you.Sincerely,

Paula Goldberg

#5771

Name: Guemmer, Kristi

Correspondence: I am writing to urge the National Park Service to discontinue the grazing of beef and dairy cattle at Point Reyes National Seashore. This precious area has been damaged by livestock grazing which poses a threat to the environment and local wildlife and it should be protected and used to serve the public good, and not for the benefit of the livestock industry.

I strongly oppose Option B and any other proposal that would be fatal to Tule Elk or other wildlife to the benefit of ranching operations, and encourage the agency to adopt Option F to discontinue grazing and allow members of the public to enjoy this beautiful park and to be enriched with opportunities to visit and appreciate this special place.

#5772

Name: Kurtz, Joanne

Correspondence: I am writing to urge the National Park Service to discontinue the grazing of beef and dairy cattle at Point Reyes National Seashore. This precious area has been damaged by livestock grazing which poses a threat to the environment and local wildlife and it should be protected and used to serve the public good, and not for the benefit of the livestock industry.

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#5773

Name: Bryson, Jenna

Correspondence: I am writing to urge the National Park Service to discontinue the grazing of beef and dairy cattle at Point Reyes National Seashore. This precious area has been damaged by livestock grazing which poses a threat to the environment and local wildlife and it should be protected and used to serve the public good, and not for the benefit of the livestock industry.

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#5774

Name: Lind, Michelle

Correspondence: I am writing to urge the National Park Service to discontinue the grazing of beef and dairy cattle at Point Reyes National Seashore. This precious area has been damaged by livestock grazing which poses a threat to the environment and local wildlife and it should be protected and used to serve the public good, and not for the benefit of the livestock industry.

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#5775

Name: K., Miriam

Correspondence: Point Reyes National Seashore is supposed to be managed under the Point Reyes Act for "maximum protection, restoration, and preservation of the natural environment." There's no mandate for prioritizing commercial agricultural leases on these public lands. Natural values, native wildlife, public access and enjoyment should take priority over commercial activities at Point Reyes. Tule elk are an important part of the landscape at Point Reyes. Their recovery is a result of successful native ecosystem restoration, which is a key element of the Park Service's mission. It's taken a lot of time, money and effort to restore tule elk to Point Reyes, the only national park where they live. Tule elk should be allowed to roam free and forage in the park - not shot, removed, fenced or treated as problem animals. Right now the Point Reyes ranches enjoy not only subsidized grazing fees and housing, but also taxpayer-funded infrastructure and road improvements, and publicly funded projects. But commercial activities at Point Reyes should be required to accommodate native wildlife - not the other way around. The Park Service shouldn't allow any new agricultural activities at Point Reyes. Planting artichokes or other row crops will attract birds. And introducing sheep, goats, pigs or chickens will attract native predators such as coyotes, bobcats and foxes. Expanded ranching would only create new wildlife conflicts. Cattle ranching should only be allowed if it's consistent with preserving the natural environment. And agricultural activities such as mowing shouldn't be allowed in park areas where they harm endangered species or wildlife habitat, impair water quality, cause excessive erosion or spread invasive plants/diseases. Cattle are the seashore's primary source of greenhouse gases. So the Park Service's preferred alternative is inconsistent with its own "Climate Friendly Parks" plan. Please... 'STOP' the SLAUGHTER of ALL animals!

Seriously, Miriam K.

#5776

Name: Horn, Suzanne

Correspondence: Please end livestock grazing at Point Reyes National Park and to allow this precious land to remain as wildlife habitat and to be used for the public good, not for the benefit of the livestock industry.

#5777

Name: Kane, Janice

Correspondence: 'F' is the only proposal that fulfills the original purpose of the park. I have been a rancher & understand the feelings of the ranchers but there has already been a 20 year extension. It is time to revert & To enforce the original intent. Thank you Janice Kane

#5778

Name: Barron, Lisa

Correspondence: Point Reyes is a treasure. We love to go there and see the wildlife. Please leave the wildlife untouched

#5779

Name: N/A, N/A

Correspondence: Public lands should not be exploited by private interests. And certainly wildlife should not be slaughtered on public lands for private gain. I wonder who's idea that was! End the cattle lease please!

#5780

Name: Slaughter, Kathleen

Correspondence: Preserve the park land for the elk and plover. Ranchers receive too much subsidy and access to public land. It should not endanger or hinder other wild species.

#5781

Name: Murray , Elizabeth

Correspondence: Please protect the native lands and wildlife, including the Tule Elk, at Point Reyes. They are a treasured public natural resource that should not be sacrificed to profit the cattle industry.

#5782

Name: Rogers, Pamela

Correspondence: Save the tule elk. Let our wildlife live in peace.

#5783

Name: Garcia, Christina

Correspondence: Please continue to protect the elk, do not allow the cows to graze this land. It can do instrumental damage to the wildlife dependent on this natural area. Please protect nature!

#5784

Name: Granucci , Gia

Correspondence: I do not support the expansion of cow grazing contacts in the park or others. The grazing will have irreparable damage on existing habitat and native animals

#5785

Name: Unser, Manda

Correspondence: I am writing to urge the National Park Service to discontinue the grazing of beef and dairy cattle at Point Reyes National Seashore. This precious area has been damaged by livestock grazing which poses a threat to the environment and local wildlife and it should be protected and used to serve the public good, and not for the benefit of the livestock industry.

I strongly oppose Option B and any other proposal that would be fatal to Tule Elk or other wildlife to the benefit of ranching operations, and encourage the agency to adopt Option F to discontinue grazing and allow members of the public to enjoy this beautiful park and to be enriched with opportunities to visit and appreciate this special place.

#5786

Name: Cartwright, Carl

Correspondence: Makes no sense to continue to allow grazing and all the damage that comes along with that.

#5787

Name: N/A, Lori

Correspondence: I am writing to urge the National Park Service to discontinue the grazing of beef and dairy cattle at Point Reyes National Seashore. This precious area has been damaged by livestock grazing which poses a threat to the environment and local wildlife and it should be protected and used to serve the public good, and not for the benefit of the livestock industry.

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#5788

Name: Meissenhalter, Jackie

Correspondence: I am writing to urge the National Park Service to discontinue the grazing of beef and dairy cattle at Point Reyes National Seashore. This precious area has been damaged by livestock grazing which poses a threat to the environment and local wildlife and it should be protected and used to serve the public good, and not for the benefit of the livestock industry.

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#5789

Name: Munroe, Patricia

Correspondence: I am writing to urge the National Park Service to discontinue the grazing of beef and dairy cattle at Point Reyes National Seashore. This precious area has been damaged by livestock grazing which poses a threat

to the environment and local wildlife and it should be protected and used to serve the public good, and not for the benefit of the livestock industry.

I strongly oppose Option B and any other proposal that would be fatal to Tule Elk or other wildlife to the benefit of ranching operations, and encourage the agency to adopt Option F to discontinue grazing and allow members of the public to enjoy this beautiful park and to be enriched with opportunities to visit and appreciate this special place.

#5790

Name: Berman, Rachel

Correspondence: I am writing to urge the National Park Service to discontinue the grazing of beef and dairy cattle at Point Reyes National Seashore. This precious area has been damaged by livestock grazing which poses a threat to the environment and local wildlife and it should be protected and used to serve the public good, and not for the benefit of the livestock industry.

I strongly oppose Option B and any other proposal that would be fatal to Tule Elk or other wildlife to the benefit of ranching operations, and encourage the agency to adopt Option F to discontinue grazing and allow members of the public to enjoy this beautiful park and to be enriched with opportunities to visit and appreciate this special place.

#5791

Name: Hall, Stacy

Correspondence: Over 5,000 cattle who are being exploited for beef and dairy production are grazing in Point Reyes National Seashore in Marin County, California, and they pose a threat to the environment, wildlife, and the public good.

The ranchers' leases are about to expire, and unfortunately several NPS proposals include slaughtering native Tule Elk in order to continue grazing livestock for profit. Please end livestock grazing at Point Reyes National Park and to allow this precious land to remain as wildlife habitat and for the public good, NOT for the benefit of the livestock industry. Thank you for your thoughtful consideration. :)

#5792

Name: Johnson, Rolf

Correspondence: Keep Pt. Reyes wild.

#5793

Name: Chan, Chungsze

Correspondence: I am writing to urge the National Park Service to discontinue the grazing of beef and dairy cattle at Point Reyes National Seashore. This precious area has been damaged by livestock grazing which poses a threat to the environment and local wildlife and it should be protected and used to serve the public good, and not for the benefit of the livestock industry.

I strongly oppose Option B and any other proposal that would be fatal to Tule Elk or other wildlife to the benefit of ranching operations, and encourage the agency to adopt Option F to discontinue grazing and allow members of the public to enjoy this beautiful park and to be enriched with opportunities to visit and appreciate this special place.

#5794

Name: Fite, Gregory

Correspondence: Point Reyes National Seashore is a unique treasure to all of us. The tule elk herd is one of its many special features. In order to protect and preserve this iconic and varied landscape, excessive cattle grazing must be curtailed. There are many other locations near there where it's better to run cattle, but not Point Reyes National Seashore.

#5795

Name: Pannell, Bonnie

Correspondence: The livestock industry, just like the fossil fuel industry, is heavily subsidized by tax payer dollars. Both negatively impact the environment. If we, as a state, country and world are going to take strong action to remediate global warming, then we need to cut back drastically on both. Since the lease is running out for cattle grazing at the Point Reyes National Seashore, I submit that this would be a good time to not renew it. I support the following scripted letter and recommendation.

I am writing to urge the National Park Service to discontinue the grazing of beef and dairy cattle at Point Reyes National Seashore. This precious area has been damaged by livestock grazing which poses a threat to the environment and local wildlife and it should be protected and used to serve the public good, and not for the benefit of the livestock industry.

I strongly oppose Option B and any other proposal that would be fatal to Tule Elk or other wildlife to the benefit of ranching operations, and encourage the agency to adopt Option F to discontinue grazing and allow members of the public to enjoy this beautiful park and to be enriched with opportunities to visit and appreciate this special place.

#5796

Name: Tabb, Linda

Correspondence: Please DO NOT KILL the natural wildlife for farms.

#5797

Name: N/A, N/A

Correspondence: I am writing to urge the National Park Service to discontinue the grazing of beef and dairy cattle at Point Reyes National Seashore. This precious area has been damaged by livestock grazing which poses a threat to the environment and local wildlife and it should be protected and used to serve the public good, and not for the benefit of the livestock industry.

I strongly oppose Option B and any other proposal that would be fatal to Tule Elk or other wildlife to the benefit of ranching operations, and encourage the agency to adopt Option F to discontinue grazing and allow members of the public to enjoy this beautiful park and to be enriched with opportunities to visit and appreciate this special place.

It is unbelievable that in today's world that someone would place profit over our environment. Let the Tule Elk and wildlife live in their natural habitat and discontinue cattle grazing.

#5798

Name: Campbell, Allan

Correspondence: Please to the National Park Service to discontinue the grazing of beef and dairy cattle at Point Reyes National Seashore. This precious area has been damaged by livestock grazing which poses a threat to the environment and local wildlife. Point Reyes should be protected and not damaged by livestock.

I strongly oppose Option B and any other proposal that would be fatal to Tule Elk or other wildlife to the benefit of ranching operations. I also encourage the National Park Service to adopt Option F to discontinue grazing and allow members of the public to enjoy this beautiful park and to be enriched with opportunities to visit and appreciate this special place.

#5799

Name: Paladin, John

Correspondence: I am writing to urge the National Park Service to discontinue the grazing of beef and dairy cattle at Point Reyes National Seashore. This precious area has been damaged by livestock grazing which poses a threat to the environment and local wildlife and it should be protected and used to serve the public good, and not for the benefit of the livestock industry.

I strongly oppose Option B and any other proposal that would be fatal to Tule Elk or other wildlife to the benefit of ranching operations, and encourage the agency to adopt Option F to discontinue grazing and allow members of the public to enjoy this beautiful park and to be enriched with opportunities to visit and appreciate this special place.

#5800

Name: Caploe, Fred

Correspondence: Demolition and Removal of Nike Missile Site Structures and Utilities, Sweeney Ridge Golden Gate National Recreation Area » Demolition and Removal of Nike Missile Site Structures and Utilities, Sweeney Ridge » Document List

Purpose and Need: The buildings associated with the Nike Missile Site at Sweeney Ridge were closed in 1974 and became part of GGNRA in 1984. The structures have deteriorated over time; although the walls remain in fair condition, the roofs are collapsing and lead paint is peeling from the walls, posing a safety hazard to the public and park staff. In addition, the site has become a popular location for graffiti and dumping. An effort was made in 2010 to stabilize the buildings, including boarding up doors and windows with plywood for public safety. Despite continued efforts by park staff to prevent entry into the buildings, the boards are repeatedly removed and the structures continue to be an attractive nuisance and safety hazard, diminishing the visitor experience at Sweeney Ridge.

Because of the safety risk these structures pose and the lack of integrity that keep them from being deemed historical, GGNRA will be removing all five structures and adjacent abandoned above ground utilities. Before work is started, hazmat testing will be required as there may be lead and asbestos to mitigate.

The structures planned for removal are: • Standby Generator Building • Interconnecting Corridor Building • Hipar Building • Readt Building • Sentry Station • Two water tanks. • Antennas, wood utility poles and cables southwest of Readt Bldg. • Trash and all loose debris within 30' radius of buildings

#5801

Name: Davenport, Susan

Correspondence: I am writing to urge the National Park Service to discontinue the grazing of beef and dairy cattle at Point Reyes National Seashore. This precious area has been damaged by livestock grazing which poses a threat to the environment and local wildlife and it should be protected and used to serve the public good, and not for the benefit of the livestock industry.

I strongly oppose Option B and any other proposal that would be fatal to Tule Elk or other wildlife to the benefit of ranching operations, and encourage the agency to adopt Option F to discontinue grazing and allow members of



the public to enjoy this beautiful park and to be enriched with opportunities to visit and appreciate this special place.

#5802

Name: Jones, Majda

Correspondence: Thank you for considering comments from the concerned public.

I visit PT Reyes at least once a year to hike and enjoy the natural beauty.

I grew up with a grandfather who farmed. I now live in a semi rural area. I used to live on and own a horse ranch. So I know and respect the farming life.

However, as I watch wilderness being constrained and plundered all over our country, I can no longer accept cattle ranching as more important than wildlife. Humans who farm have alternatives when they must constrain or eliminate their activities. Wildlife have no alternatives; they face death.

There is no excuse for shooting Tule Elk in favor of cattle. Cattle exist nearly everywhere there is farmland. Tule elk exist only here, at Point Reyes. Sometimes there are difficult choices to face, where humans must make sacrifices for the voiceless wild. This is one of those times.

Just because farming has existed for generations on Point Reyes does not mean it must always continue there. The trade offs here are clear: This is Tule Elks' only possible living place. Farmers can move.

Thank you, Majda Jones

#5803

Name: Yetter, Guadalupe

Correspondence: Please do not allow the ranchers at Point Reyes California to cull the Tule Elk. Piece by piece the natural beauty of California has been taken apart and with it the natural resources in it destroyed. The Tule Elk will continue to decline in numbers and future generations will never be able to enjoy them. Our family makes it a point to make the long 5 hour drive to see them in their natural habitat. We will spot a couple of Elk Bulls and then.. not to far off, a group of elk cows. I know my words do not carry any weight compared to that of the ranchers, but at least I can say that my family has seen the Tule elk live and unfettered and let me tell you what a sight that is.

#5804

Name: Segale, Ellen

Correspondence: Rule elk are native, ranchers are not. I support the elk!

#5805

Name: N/A, N/A

Correspondence: Please do not cull the Tule Elk for cattle. There's enough cattle but not enough native wildlife.

#5806

Name: Peters, Valerie

Correspondence: Please do not allow cattle grazing on this land. Leave the Elk there. Thank you.

#5807

Name: de Nijs, Sacha

Correspondence: Protect tule elk! They are a valuable treasure and deserve a place in this world... don't let the cattle industry destroy whatever habitat the Tule Elk need to survive!

#5808

Name: Yamada, June

Correspondence: Protect Point Reyes from livestock farming.

#5809

Name: Placone, Richard

Correspondence: To the NPS:

In determining whether or not to continue cattle grazing on the Point Reyes National Preserve, I remind you of this - science has demonstrated that one of the factors in Global Warming is the large consumption of beef cattle and other animals. AS a scientific organization I need not explain to you why this is so. But by stopping the grazing in this precious seaside reserve, you will be contributing to keeping this region open and free for public enjoyment and the protection of the plant and animal environment.

Industry of one sort or another already occupies much of the ecologically sensitive reserves in this country. Constant attempts at further encroachment are made every day - in the Grand Canyon for uranium mining; all over the mid-west and even in California for expanded fracking for oil and gas (both deadly greenhouse gas producers); in the few ocean sanctuaries we have for the protection of marine life and ecological systems.

These lands belong to the American people and not to any single or group of industrial interests. Ecologically sensitive and especially beautiful areas are preserved for the benefit of the American people now and for those to come.

Point Reyes is a very special place in California. It should not be pasture for some rancher's cattle.

Finally the fact that the NPS would even think of killing the native Elk to make room for cattle is beyond the pale.

Thank you.

Richard and Jeanne Placone Palo Alto, California

#5810

Name: Steigler, Susan

Correspondence: I am writing to urge the National Park Service to discontinue the grazing of beef and dairy cattle at Point Reyes National Seashore. This precious area has been damaged by livestock grazing which poses a threat to the environment and local wildlife and it should be protected and used to serve the public good, and not for the benefit of the livestock industry.

I strongly oppose Option B and any other proposal that would be fatal to Tule Elk or other wildlife to the benefit of ranching operations, and encourage the agency to adopt Option F to discontinue grazing and allow members of the public to enjoy this beautiful park and to be enriched with opportunities to visit and appreciate this special place.

#5811

Name: Cameron, Connie

Correspondence: I am writing to urge the National Park Service to discontinue the grazing of beef and dairy cattle at Point Reyes National Seashore. This precious area has been damaged by livestock grazing which poses a threat to the environment and local wildlife and it should be protected and used to serve the public good, and not for the benefit of the livestock industry.

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#5812

Name: N/A, N/A

Correspondence: I need to see that we protect National Parks for wildlife animals & not for farming animals because farmers didn't buy the acres from National Parks. I don't want to see that National Parks to be sold for any reason therefore No farming animals such as cows eat at National Parks.

#5813

Name: Wyatt, Wendy

Correspondence: I am writing to urge the National Park Service to discontinue the grazing of beef and dairy cattle at Point Reyes National Seashore. This precious area has been damaged by livestock grazing which poses a threat to the environment and local wildlife and it should be protected and used to serve the public good, and not for the benefit of the livestock industry.

I strongly oppose Option B and any other proposal that would be fatal to Tule Elk or other wildlife to the benefit of ranching operations, and encourage the agency to adopt Option F to discontinue grazing and allow members of the public to enjoy this beautiful park and to be enriched with opportunities to visit and appreciate this special place.

#5814

Name: N/A, N/A

Correspondence: Please adopt Alternative F, which would discontinue farming and ranching opportunities in the park and expand visitor opportunities. The preservation of native wild species must take precedence over farming and ranching activities. Grazing negatively affects ecosystems, causing water pollution and soil erosion, spreading invasive species and disease, and harming endangered species.

#5815

Name: Dr. Kingston Cataldo, Claudia

Correspondence: I am writing to urge the National Park Service to discontinue the grazing of beef and dairy cattle at Point Reyes National Seashore. This precious area has been damaged by livestock grazing which poses a threat to the environment and local wildlife and it should be protected and used to serve the public good, and not for the benefit of the livestock industry.

I strongly oppose Option B and any other proposal that would be fatal to Tule Elk or other wildlife to the benefit of ranching operations, and encourage the agency to adopt Option F to discontinue grazing and allow members of

the public to enjoy this beautiful park and to be enriched with opportunities to visit and appreciate this special place.

#5816

Name: Hayes, Christine

Correspondence: I am writing to urge the NPS to end livestock grazing at Point Reyes National Park and to allow this precious land to remain as wildlife habitat and to be used for the public good, not for the benefit of the livestock industry. This precious area has been damaged by livestock grazing which poses a threat to the environment and local wildlife and it should be protected and used to serve the public good, and not for the benefit of the livestock industry.

I strongly oppose Option B and any other proposal that would be fatal to Tule Elk or other wildlife to the benefit of ranching operations, and encourage the agency to adopt Option F to discontinue grazing and allow members of the public to enjoy this beautiful park and to be enriched with opportunities to visit and appreciate this special place.

Thank you for your consideration- -please be stewards of our parks for all the people not just farmers and ranchers.

#5817

Name: N/A, Cory

Correspondence: I am writing to urge the National Park Service to discontinue the grazing of beef and dairy cattle at Point Reyes National Seashore. This precious area has been damaged by livestock grazing which poses a threat to the environment and local wildlife and it should be protected and used to serve the public good, and not for the benefit of the livestock industry.

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#5818

Name: Tsomo, Karma Lekshe

Correspondence: I am writing to urge the National Park Service to discontinue the grazing of beef and dairy cattle at Point Reyes National Seashore. This precious area has been damaged by livestock grazing which poses a threat to the environment and local wildlife and it should be protected and used to serve the public good, and not for the benefit of the livestock industry.

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#5819

Name: Cornelius, Therese

Correspondence: I am writing to urge the National Park Service to discontinue the grazing of beef and dairy cattle at Point Reyes National Seashore. This precious area has been damaged by livestock grazing which poses a threat

to the environment and local wildlife and it should be protected and used to serve the public good, and not for the benefit of the livestock industry.

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#5820

Name: McDonald, Stacey

Correspondence: I am writing to urge the National Park Service to discontinue the grazing of beef and dairy cattle at Point Reyes National Seashore. This precious area has been damaged by livestock grazing which poses a threat to the environment and local wildlife and it should be protected and used to serve the public good, and not for the benefit of the livestock industry.

I strongly oppose Option B and any other proposal that would be fatal to Tule Elk or other wildlife to the benefit of ranching operations, and encourage the agency to adopt Option F to discontinue grazing and allow members of the public to enjoy this beautiful park and to be enriched with opportunities to visit and appreciate this special place.

#5821

Name: Wheeler, Terri

Correspondence: I am writing to urge the National Park Service to discontinue the grazing of beef and dairy cattle at Point Reyes National Seashore. This precious area has been damaged by livestock grazing which poses a threat to the environment and local wildlife and it should be protected and used to serve the public good, and not for the profit of the planet-killing and public health-threatening livestock industry.

I strongly oppose Option B and any other proposal that would be fatal to Tule Elk or other wildlife to the benefit of ranching operations, and encourage the agency to adopt Option F to discontinue grazing and allow members of the public to enjoy this beautiful park and to be enriched with opportunities to visit and appreciate this special place.

I have many fond memories from my own childhood of viewing the Tule Elk through binoculars from across Tomales Bay and of visiting Point Reyes, and it is important to preserve this public land and its native wildlife for future generations. I want my tax dollars to be used to preserve the Point Reyes National Seashore and its native wildlife, not to support the livestock industry's profit. Let's not follow the horrible example of the Brazilian government in burning down the Amazon rainforest so that the cattle industry can make money selling the flesh from the animals they graze there. Stop the damage to this beautiful area now; don't make it worse by killing the native wildlife and letting the ranchers destroy the natural beauty of the Point Reyes National Seashore.

#5822

Name: Pardo, Daniela

Correspondence: I really care about protecting California's nature, environment, and wildlife. I oppose the National Park Service's Plan to kill native tule elk and expand ranching land in Point Reyes National Seashore and Golden Gate National Recreation Area. I ask you please, National Park Service to instead restore the lands for wild animal habitat. Please preserve the public lands and wildlife. Do not expand the area for private ranchers. Commercial ranchers have serious environmental impacts on the park. They pollute waterways, cause soil erosion, and harm the many endangered and threatened animals who live on Point Reyes. National parks are supposed to exist to protect our national resources and native wildlife. thank you.

#5823

Name: Goatcher, Roxana

Correspondence: I'm am writing in opposition to culling the native wildlife of Point Reyes National Seashore. I live in Marin and frequent Tomales Bay and the beautiful seashore the National Park Service has preserved for so long. The culling of the native elk does not benefit the land, environment, or grand majority of residents. Expanding grazing land has been proven to be detrimental to the surrounding environments and habitats. We love our land and feel strongly about continuing its preservation and hope the NPS maintain their stewardship of the land that fewer and fewer native animals can call home. The state of land and animals should not be dictated by those few who stand to gain financially. Do not take these lives in vain. Thank you for all your hard work and all you do. We support the NPS and feel deeply that our country's richness & wealth does not lie in money alone but in our resources, our unique land and parks from sea to shining sea.

Sincerely with all my heart, Roxana Goatcher

#5824

Name: Silverman, Marc

Correspondence: The animal agriculture industry has routinely taken advantage of preferential access to land, water, and other resources, Over 5,000 cattle who are being exploited for beef and dairy production are grazing in Point Reyes National Seashore in Marin County, CA. I urge you to to end livestock grazing at Point Reyes National Park and to allow this precious land to remain as wildlife habitat and to be used for the public good, not for the benefit of the livestock industry.

#5825

Name: byers, sharon

Correspondence: Please protect Pt. Reyes from the livestock industry!

#5826

Name: Murti, Vasu

Correspondence: I am writing to urge the National Park Service to discontinue the grazing of beef and dairy cattle at Point Reyes National Seashore. This precious area has been damaged by livestock grazing which poses a threat to the environment and local wildlife and it should be protected and used to serve the public good, and not for the benefit of the livestock industry.

I strongly oppose Option B and any other proposal that would be fatal to Tule Elk or other wildlife to the benefit of ranching operations, and encourage the agency to adopt Option F to discontinue grazing and allow members of the public to enjoy this beautiful park and to be enriched with opportunities to visit and appreciate this special place.

#5827

Name: Bartlett, Linda

Correspondence: Pt. Reyes is for wild animals, not for grazing cows or any other agricultural purposes. Keep this land as it is.

#5828

Name: Herman, Gene

Correspondence: I am writing to urge the National Park Service to discontinue the grazing of beef and dairy cattle at Point Reyes National Seashore. This precious area has been damaged by livestock grazing which poses a threat

to the environment and local wildlife and it should be protected and used to serve the public good, and not for the benefit of the livestock industry.

I strongly oppose Option B and any other proposal that would be fatal to Tule Elk or other wildlife to the benefit of ranching operations, and encourage the agency to adopt Option F to discontinue grazing and allow members of the public to enjoy this beautiful park and to be enriched with opportunities to visit and appreciate this special place.

I have immensely enjoyed observing the Tule Elk the many times I have visited Point Reyes...please please keep it that way.

#5829

Name: Ricks, Meagan

Correspondence: I am writing to urge the National Park Service to discontinue the grazing of beef and dairy cattle at Point Reyes National Seashore. This precious area has been damaged by livestock grazing which poses a threat to the environment and local wildlife and it should be protected and used to serve the public good, and not for the benefit of the livestock industry.

I strongly oppose Option B and any other proposal that would be fatal to Tule Elk or other wildlife to the benefit of ranching operations, and encourage the agency to adopt Option F to discontinue grazing and allow members of the public to enjoy this beautiful park and to be enriched with opportunities to visit and appreciate this special place.

#5830

Name: Levinson, Ellis

Correspondence: Must the survival of wild animals always be at the pleasure of industrial influencers? I urge the National Park Service to discontinue the grazing of beef and dairy cattle at Point Reyes National Seashore. This precious area has been damaged by livestock grazing, which poses a threat to the environment and local wildlife. It should be protected to serve the public good, not for the benefit of the livestock industry.

I strongly oppose Option B and any other proposal that would be fatal to Tule Elk or other wildlife to the benefit of ranching operations, and encourage the agency to adopt Option F to discontinue grazing and allow members of the public to enjoy this beautiful park and to be enriched with opportunities to visit and appreciate this special place.

#5831

Name: Laur, Janet

Correspondence: Please do not allow the destruction of wildlife and their homes at Point Reyes. We do not need more grazing. Eating too much animal flesh is unhealthy and damages the earth. Please, be kind. Let all creatures live a natural life.

#5832

Name: White, BJ

Correspondence: NPS, please stop allowing non-native cattle to use and abuse the flora at Point Reyes National Seashore. This precious area has been damaged by livestock grazing. The cattle pose a threat to the environment and local wildlife. This natural resource should be protected and used to serve the public good, and not for the benefit of the livestock industry.

I strongly oppose Option B and any other proposal that would be fatal to Tule Elk or other wildlife to the benefit of ranching operations, and encourage the agency to adopt Option F to discontinue grazing and allow members of the public to enjoy this beautiful park and to be enriched with opportunities to visit and appreciate this special place.

#5833

Name: Firestone, Klara

Correspondence: I am writing to urge the National Park Service to discontinue the grazing of beef and dairy cattle at Point Reyes National Seashore. This precious area has been damaged by livestock grazing which poses a **THREAT TO THE ENVIRONMENT AND LOCAL WILDLIFE** and it should be protected and used to serve the public good, and NOT for the benefit of the livestock industry.

I STRONGLY OPPOSE Option B and any other proposal that would be fatal to Tule Elk or other wildlife to the benefit of ranching operations, and encourage the agency to adopt Option F to discontinue grazing and allow members of the public to enjoy this beautiful park and to be enriched with opportunities to visit and appreciate this special place.

#5834

Name: Dowling, Holly

Correspondence: I am opposed to culling or removing the Tule Elk so that ranchers can run their cattle on this land. The elk have been here a long time and deserve to remain where they are. We must resist efforts to remove native species simply in order to make the cattle industry happy. I grew up in Marin County and have many memories from childhood on of the Tule Elk. They are a part of our heritage and must be preserved.

Thank you for your consideration.

#5835

Name: Sanchez, Anna

Correspondence: I am writing to urge the National Park Service to discontinue the grazing of beef and dairy cattle at Point Reyes National Seashore. This precious area has been damaged by livestock grazing which poses a threat to the environment and local wildlife and it should be protected and used to serve the public good, and not for the benefit of the livestock industry.

I strongly oppose Option B and any other proposal that would be fatal to Tule Elk or other wildlife to the benefit of ranching operations, and encourage the agency to adopt Option F to discontinue grazing and allow members of the public to enjoy this beautiful park and to be enriched with opportunities to visit and appreciate this special place.

#5836

Name: Nelson, Brad

Correspondence: Cows are not native to the Point Reyes National Seashore. Tule elk are native. Thus Tule elk should remain at Point Reyes and the cattle should be expelled. Raising thousands of cows for meat adversely affects the health of our planet and the environment at the Point Reyes National Seashore, thus Option F is the option that should be enacted at Point Reyes.

#5837

Name: Jordan, Mark

Correspondence: Cattle destroy ecosystems. Leave beautiful areas for future generations.



#5838

Name: N/A, N/A

Correspondence: I am writing to urge the National Park Service to discontinue the grazing of beef and dairy cattle at Point Reyes National Seashore. This precious area has been damaged by livestock grazing which poses a threat to the environment and local wildlife and it should be protected and used to serve the public good, and not for the benefit of the livestock industry.

I strongly oppose Option B and any other proposal that would be fatal to Tule Elk or other wildlife to the benefit of ranching operations, and encourage the agency to adopt Option F to discontinue grazing and allow members of the public to enjoy this beautiful park and to be enriched with opportunities to visit and appreciate this special place.

#5839

Name: white, pam

Correspondence: I am writing to urge the National Park Service to discontinue the grazing of beef and dairy cattle at Point Reyes National Seashore. This precious area has been damaged by livestock grazing which poses a threat to the environment and local wildlife and it should be protected and used to serve the public good, and not for the benefit of the livestock industry.

I strongly oppose Option B and any other proposal that would be fatal to Tule Elk or other wildlife to the benefit of ranching operations, and encourage the agency to adopt Option F to discontinue grazing and allow members of the public to enjoy this beautiful park and to be enriched with opportunities to visit and appreciate this special place.

#5840

Name: Tompkins, Laura

Correspondence: I'm writing to support the public access and bicycling improvements outlined under Alternatives B, C, D, E, and F. STRONGLY support proposals that would lead to the planning and implementation of bicycling routes on trails, ranch roads, and pathways throughout the planning area, including but not limited to: 1) a connection between Devil's Gulch and Platform Bridge Road using existing ranch roads, 2) a connection between Bolinas Ridge Trail at Olema Hill and Point Reyes Station to serve as an interim connection for the Cross Marin Trail, 3) a connection between Bolinas Ridge Trail and Five Brooks Stables using existing ranch roads 4) a connection between Drakes Estero and Abbotts Lagoon Trail using existing ranch roads, 5) a connection between Marshall Beach Trailhead and Pierce Point Road using existing ranch roads, and 6) an Estero Trail loop using existing ranch roads. I encourage NPS to collaborate with ranchers and other stakeholders to educate the public and address concerns related to public access on working ranch lands.

The improvements outlined above would enable and encourage me to visit the Seashore more regularly-and by bike, rather than car. I would feel much safer riding in the Seashore and surrounding areas on trails, pathways, and ranch roads, rather than on roads shared with fast-moving vehicular traffic. Bicycling opportunities are currently very limited and fragmented, so any improvements in connectivity and the creation of new loop options would enable me to enjoy more of the Seashore and surrounding areas by bike.

#5841

Name: Abrams, Dr. Allan and Mrs Deborah

Correspondence: Please protect this special place for animals to continue grazing calmly and lovingly in this area. Protect the elk and other animals that live here. There are only certain areas where you can meditate, be peaceful and know that the universal spirit lives in a protected place. Save this area for all who come after us.,

#5842

Name: Due, Jessica

Correspondence: I am writing to urge the National Park Service to discontinue the grazing of beef and dairy cattle at Point Reyes National Seashore. This precious area has been damaged by livestock grazing which poses a threat to the environment and local wildlife and it should be protected and used to serve the public good, and not for the benefit of the livestock industry.

I strongly oppose Option B and any other proposal that would be fatal to Tule Elk or other wildlife to the benefit of ranching operations, and encourage the agency to adopt Option F to discontinue grazing and allow members of the public to enjoy this beautiful park and to be enriched with opportunities to visit and appreciate this special place.

#5843

Name: Harrop, Brenda

Correspondence: I am writing to INSTRUCT the National Park Service YOU ARE A PARK SERVICE!! to discontinue the grazing of beef and dairy cattle at Point Reyes National Seashore. STOP THE CATTLE AND DAIRY INDUSTRIES OF VIOLENT ABUSE, TORTURE AND MURDER OF INNOCENT ANIMALS!! This precious area has been damaged by livestock grazing which poses a threat to the environment and local wildlife and it should be protected and used to serve the public good, and not for the benefit of the GREEDY, EVIL, SICK livestock industry.

I strongly oppose Option B and any other proposal that would be fatal to Tule Elk or other wildlife to the benefit of A FEW GREEDY NEFARIOUS OWNERS OF ranching operations, and encourage the agency to adopt Option F to discontinue grazing and allow members of the public to enjoy this beautiful park and to be enriched with opportunities to visit and appreciate this special place.

#5844

Name: N/A, N/A

Correspondence: I am writing to urge the National Park Service to discontinue the grazing of beef and dairy cattle at Point Reyes National Seashore. This precious area has been damaged by livestock grazing which poses a threat to the environment and local wildlife and it should be protected and used to serve the public good, and not for the benefit of the livestock industry.

#5845

Name: Gehricke, Gina

Correspondence: Factory farming is one of the most insidious practices of our times. The incredible pain, suffering and indifference to sentient life is at its core.

We need to diminish not increase egregious factory farming, for the sake of animals, humans and the planet.

We are at a tipping point, and the more we ignore the planet and its inhabitants, for short term money making, the more we all lose in the long run.

I am imploring you to stop the planning of more destruction to our already suffering planet.

Thank you. Gina Gehricke

#5846

Name: Stanford, Jeff

Correspondence: For years I have been aware of the issue regarding cattle grazing on National Park Service Land at Point Reyes National Seashore. This is a significant time as it is allowing the public's input into the use of this National treasure.

Point Reyes, to the greatest extent possible, should be returned to a natural state. It is a public treasure and regardless of different issues regarding animal agriculture, the land should be returned to wildlife, and for the us, the public, to be able to witness what will be restored wilderness.

I recommend the adoption of Option F. Thank you for your consideration

#5847

Name: Milford, Mona

Correspondence: Keep Point Reyes wild and beautiful. Cattle belong on ranches, not on our wild lands. Killing wildlife for ranching would be wrong on every level

#5848

Name: Sullivan, Margaret

Correspondence: I am writing to urge the National Park Service to discontinue the grazing of beef and dairy cattle at Point Reyes National Seashore. This precious area has been damaged by livestock grazing which poses a threat to the environment and local wildlife and it should be protected and used to serve the public good, and not for the benefit of the livestock industry.

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#5849

Name: Ruston, Rene

Correspondence: I am writing to urge the National Park Service to discontinue the grazing of beef and dairy cattle at Point Reyes National Seashore. This precious area has been damaged by livestock grazing which poses a threat to the environment and local wildlife and it should be protected and used to serve the public good, and not for the benefit of the livestock industry.

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#5850

Name: WILSON, ARTHUR

Correspondence: I am writing to urge the National Park Service to discontinue the grazing of beef and dairy cattle at Point Reyes National Seashore. This precious area has been damaged by livestock grazing which poses a threat to the environment and local wildlife and it should be protected and used to serve the public good, and not for the benefit of the livestock industry.

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the public to enjoy this beautiful park and to be enriched with opportunities to visit and appreciate this special place.

#5851

Name: Young, Samuel

Correspondence: Treat all living animals equally.

#5852

Name: Bertoli, Chandler

Correspondence: I am writing to urge the National Park Service to discontinue the grazing of beef and dairy cattle at Point Reyes National Seashore. This precious area has been damaged by livestock grazing which poses a threat to the environment and local wildlife and it should be protected and used to serve the public good, and not for the benefit of the livestock industry.

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#5853

Name: green, christian

Correspondence: I am writing to urge the National Park Service to discontinue the grazing of beef and dairy cattle at Point Reyes National Seashore. This precious area has been damaged by livestock grazing which poses a threat to the environment and local wildlife and it should be protected and used to serve the public good, and not for the benefit of the livestock industry.

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#5854

Name: Gyll, Sabrina

Correspondence: I am writing to urge the National Park Service to discontinue the grazing of beef and dairy cattle at Point Reyes National Seashore. This precious area has been damaged by livestock grazing which poses a threat to the environment and local wildlife and it should be protected and used to serve the public good, and not for the benefit of the livestock industry.

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#5855

Name: N/A, N/A

Correspondence: SAVE THE TULE ELK DO NOT KILL THEM MARIN HEADLANDS MATTERS SAVE THE ELKS

#5856

Name: Stacks, Lani

Correspondence:

IT IS CRITICAL THAT ALL REYES POINT WILDLIFE BE PROTECTED IN THEIR OWN HABITAT.

#5857

Name: Peterson , Darci

Correspondence: I used to live in the Chula Vista area. I always loved taking a drive to See the elk, please preserve this area and the Elk! California leads the nation in preservation and intelligence Please keep leading the pack!!

#5858

Name: N/A, N/A

Correspondence: I am writing to urge the National Park Service to discontinue the grazing of beef and dairy cattle at Point Reyes National Seashore. This precious area has been damaged by livestock grazing which poses a threat to the environment and local wildlife and it should be protected and used to serve the public good, and not for the benefit of the livestock industry.

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#5859

Name: Yeh, Elaine

Correspondence: I am writing to urge the National Park Service to discontinue the grazing of beef and dairy cattle at Point Reyes National Seashore. This precious area has been damaged by livestock grazing which poses a threat to the environment and local wildlife and it should be protected and used to serve the public good, and not for the benefit of the livestock industry.

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#5860

Name: Hodges, Barbara

Correspondence: I am writing to urge the National Park Service to discontinue the grazing of beef and dairy cattle at Point Reyes National Seashore. This precious area has been damaged by livestock grazing which poses a threat to the environment and local wildlife and it should be protected and used to serve the public good, and not for the benefit of the livestock industry.

I strongly oppose Option B and any other proposal that would be fatal to Tule Elk or other wildlife to the benefit of ranching operations, and encourage the agency to adopt Option F to discontinue grazing and allow members of the public to enjoy this beautiful park and to be enriched with opportunities to visit and appreciate this special place.

#5861

Name: Gates, Jan

Correspondence: Tule Elk BELONG here; cattle do not. The greedy profits of a few should not outweigh the long term benefits to our native CA wildlife. Please do not be swayed by the money here.

#5862

Name: Hammonds, William

Correspondence: I'm writing to support the public access and bicycling improvements outlined under Alternatives B, C, D, E, and F. I strongly support proposals that would lead to the planning and implementation of bicycling routes on trails, ranch roads, and pathways throughout the planning area, including but not limited to: 1) a connection between Devil's Gulch and Platform Bridge Road using existing ranch roads, 2) a connection between Bolinas Ridge Trail at Olema Hill and Point Reyes Station to serve as an interim connection for the Cross Marin Trail, 3) a connection between Bolinas Ridge Trail and Five Brooks Stables using existing ranch roads 4) a connection between Drakes Estero and Abbotts Lagoon Trail using existing ranch roads, 5) a connection between Marshall Beach Trailhead and Pierce Point Road using existing ranch roads, and 6) an Estero Trail loop using existing ranch roads. I encourage NPS to collaborate with ranchers and other stakeholders to educate the public and address concerns related to public access on working ranch lands.

The improvements outlined above would enable and encourage me to visit the Seashore more regularly-and by bike, rather than car. I would feel much safer riding in the Seashore and surrounding areas on trails, pathways, and ranch roads, rather than on roads shared with fast-moving vehicular traffic. Bicycling opportunities are currently very limited and fragmented, so any improvements in connectivity and the creation of new loop options would enable me to enjoy more of the Seashore and surrounding areas by bike.

#5863

Name: McGuinness, CB

Correspondence: The new study focuses on the drop in sheer numbers of birds, not extinctions. The bird population in the United States and Canada was probably around 10.1 billion nearly half a century ago and has fallen 29% to about 7.2 billion birds, according to a study in Thursdays journal Science .

This is what I read in the Washington Post today, September 19, 2019. This is what I read before sitting down to write my comment about the management plan proposals for the Point Reyes National Seashore. This is what I read after I spent part of my day working on habitat restoration within the park. I am a volunteer, not an employee. My deep love for Point Reyes, my home for over 25 years, inspires me to spend hours pulling out weeds by hand with the hope that enough native plants will survive to make a difference. Sometimes visitors look around at the endlessness of ice plant and wonder why we bother. They only see an insurmountable problem. But we who actively love the park see possibilities in every single flower we save. If people like us gave up, those flowers wouldnt be here and all of the other species that depend on them would disappear, too.

The Washington Post article went on to report that Experts say habitat loss was the No. 1 reason for bird loss. Despite the increasingly obvious need to protect habitat and despite the national park mandate To conserve the scenery and the natural and historic objects and the wild life 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. (Organic Act of 1916 establishing the National Park Service), the Seashore is considering proposals that would most certainly destroy habitat and native species. Most of these proposals seem only to consider how a relatively small group of people can make the biggest profit possible off public land without considering the full cost (financially, environmentally, and socially) of the proposals to the rest of the community. If the ranchers were to honor the promise that they made over 50 years ago when the government bought their land, then only Alternative F should be considered. The ranches should be phased out, the old buildings saved for historic interest, and the park could then focus its resources on restoring the habitat damaged by overgrazing.

If that choice, though planned from the inception of PRNS, seems too dramatic, then Alternative E would be a less terrible choice. By phasing out some of the ranches, Alternative E could reduce their negative impacts while maintaining the benefit of grazing in pastures of invasive grasses. In addition, I think that the park needs to determine how many cows the land can support, and the ranchers must not exceed that number. I am, however, opposed to any measure that favors the cows over the elk. I do not want fences that would prevent the elk from reaching water sources, and I do not want elk killed to reduce competition with cattle. By granting shorter leases, the park would theoretically have the authority to ensure that the ranches adhere to the parks mandate. However, given the degraded condition of some of the ranches, the park doesnt seem to be doing enough currently to protect our natural resources.

The other proposals would dishonor the parks mandate further. I am appalled that a proposal to kill even more native elk on public land to gratify ranchers would be considered. Doing so would seem to undo the hard work the park did to reintroduce the elk. The website for PRNS describes Tule Elk as endemic to California, which makes protecting them far more imperative than maintaining unsustainably large herds of the ubiquitous cow.

There also seems to be little thought for how the plans would actually be implemented. Where would water for crops come from, and how would that increased water usage affect the native plants and animals that also rely on the water? How would growers protect their crops from deer, rabbits, gophers, and birds? Deer fencing would only keep out deer, but other hungry animals would find their way to the crops or chickens. Surely the national park would not permit the killing of even more native animals to protect farms that lack even the veneer of being historical as justification. Some of those crops could become invasive and decrease native plant diversity in the same way that ice plant does. Whoever brought those plants into this area either didnt consider the potential effects or believed theyd be negligible. But were still trying to undo the damage of this invasive plant, and the financial and environmental cost is enormous. We should not keep making the same foolish mistakes of assuming that the introduction of new plants, animals, and land management practices will have no negative consequences. Furthermore, even organic farms use fertilizers and pesticides. How would runoff would affect water quality? Excess nitrogen, even from organic sources, can result in algae blooms. Even carefully applied pesticides can harm beneficial insects and amphibians, which would have an impact on any creature that relies on them for food.

The presence of farm stands and B&Bs would most certainly increase traffic. Thats their purpose. But our community is already suffering from a huge increase in tourism and its associated evils: traffic, accidents, pollution from running or even idling cars, overburdened septic systems, noise... Where is the budget for more first responders? Infrastructure? We already subsidize the ranches, and the ranchers seem to thank us only by increasing their demands and acting as though theyre victims of government overreach.

There is great attention paid to the historical importance of ranches in this area. But why is there not the same attention given to the history of the Coast Miwok? Their history in this area stretches further back than that of the earliest ranches. What if we honored their history with the same dedication and resources that are generally paid to the relatively short ranching history?

Private profit on public land should not dictate park policy. Id rather see the parks limited resources go toward interpretation and conservation, which would also provide jobs. More rangers educating visitors, more signs, more programs to protect natives! Where else can people see Tule Elk or Point Reyes meadowfoam? Point Reyes National Seashore should be celebrated by everyone-not managed for profit for a minority.

#5864

Name: N/A, N/A

Correspondence: Please don't allow the cows to graze in the national park

#5865

Name: Sheehan, Katie

Correspondence: Do not kill the elk in point Reyes. That's a monstrous idea.

#5866

Name: Korney, Li

Correspondence: Please note that many California and US citizens appreciate the local elk and wildlife. We spend tourist dollars to enjoy area cabins, bed and breakfasts, eat at local restaurants, and enjoy quiet among the area National Mark lands.

I don't want to see more ranches, there are plenty in California. The ranch profits are also not growing locally, so why erode more Park land and nature to aid a dying interest? Some of the ranches can be converted to plant based farming, but then the elk shall be blamed for injuring the plants. We want the local elk populations preserved. Most have fenced territory that do not harm the existing ranches anyway.

I have friends in Asia who travelled to see the elk and visit the lovely redwoods nearby. The wildlife and parks are known further than you may realize. It is not right to destroy local tourism for the interests of a few selfish ranchers. Elk tourism creates money for numerous smaller businesses who sell smoked fish, fruit, antiques, Native American history, cabin rentals, hiking and fishing experiences.... do not kill the diversity of future tourism , and kill an important member of the local food chain / biodiversity, for the benefit of a few ranchers. This is public land, for the benefit of all citizens. Keep it that way.

#5867

Name: Esh, Michelle

Correspondence: I am writing to urge the National Park Service to discontinue the grazing of beef and dairy cattle at Point Reyes National Seashore. This precious area has been damaged by livestock grazing which poses a threat to the environment and local wildlife and it should be protected and used to serve the public good, and not for the benefit of the livestock industry.

I strongly oppose Option B and any other proposal that would be fatal to Tule Elk or other wildlife to the benefit of ranching operations, and encourage the agency to adopt Option F to discontinue grazing and allow members of the public to enjoy this beautiful park and to be enriched with opportunities to visit and appreciate this special place.

#5868

Name: Seltzer, Janet

Correspondence: I am writing to urge the National Park Service to discontinue the grazing of beef and dairy cattle at Point Reyes National Seashore. This precious area has been damaged by livestock grazing which poses a threat to the environment and local wildlife and it should be protected and used to serve the public good, and not for the benefit of the livestock industry.

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When the government purchased Pt. Reyes National Seashore, its purpose was "to protect and preserve the native flora and fauna." Overgrazing of cattle has resulted in soil erosion, degradation of water quality, damage to endangered species habitats, and the spread of invasive plants in the park.



The livelihood of the ranchers has taken precedence over the elk, as is evidenced by the drought of 2012-2014. During that time, the Tomales Point herd was fenced-in to keep them away from the cows. As a result, 46% of the elk died off because they were denied access to areas where they could reach water and food. The herd dropped from 540 to 286. No cows died during that same period of time. This is just one example of how the benefit of the ranchers is coming first, at the expense of the native elk and other native flora and fauna. I strongly urge the NPS to stand up for the intended use of the Park - - to protect and preserve the native flora and fauna.

Sincerely, Janet Seltzer

#5869

Name: pacheco, susan

Correspondence: I am writing to urge the National Park Service to discontinue the grazing of beef and dairy cattle at Point Reyes National Seashore. This precious area has been damaged by livestock grazing which poses a threat to the environment and local wildlife and it should be protected and used to serve the public good, and not for the benefit of the livestock industry.

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#5870

Name: N/A, N/A

Correspondence: I am writing to urge the National Park Service to discontinue the grazing of beef and dairy cattle at Point Reyes National Seashore. This precious area has been damaged by livestock grazing which poses a threat to the environment and local wildlife and it should be protected and used to serve the public good, and not for the benefit of the livestock industry.

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#5871

Name: Johnston, Naila

Correspondence: Please, cattle need to eat but not where other animals have their God-given right to be there!!! Elk, Deer, Horses, Burros, etc.. Please help ALL the animals!!

#5872

Name: Newman, Nancy

Correspondence: Please, please, please DO NOT KILL the TULE ELK. These elk are what a National Park is all about!!! There are plenty of other locations where agricultural etc. enterprises can locate without killing these wonderful animals. Why does the government always choose making MONEY over PRESERVING and PROTECTING our National Parks and it's animals? So many people, including myself, experience such pleasure, peace, and JOY when we observe these gorgeous animals.

#5873

Name: mccain, maggie

Correspondence: No ranching. This has to stop for Pt Reyes and the planet. Cattle add to climate warming and don't belong there.

#5874

Name: Stover, Jaye

Correspondence: ALTERNATIVE F. NO GRAZING MEANS A FUTURE for our Ecosystem. Choose Alternative F!

#5875

Name: Stover, Jaye

Correspondence: ALTERNATIVE F. NO GRAZING MEANS A FUTURE for our Ecosystem. Choose Alternative F!

#5876

Name: Mitchell, Lesley

Correspondence: Please do not allow any destruction of the Tule Elk at PT. Reyes.

#5877

Name: Knickerbocker, Deanna

Correspondence: I am writing to urge the National Park Service to discontinue the grazing of beef and dairy cattle at Point Reyes National Seashore. This precious area has been damaged by livestock grazing which poses a threat to the environment and local wildlife and it should be protected and used to serve the public good, and not for the benefit of the livestock industry.

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#5878

Name: Albanese, Elena

Correspondence: I am writing to urge the National Park Service to discontinue the grazing of beef and dairy cattle at Point Reyes National Seashore. This precious area has been damaged by livestock grazing which poses a threat to the environment and local wildlife and it should be protected and used to serve the public good, and not for the benefit of the livestock industry.

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#5879

Name: N/A, Elaine

Correspondence: I am writing to urge the National Park Service to discontinue the grazing of beef and dairy cattle at Point Reyes National Seashore. This precious area has been damaged by livestock grazing which poses a threat to the environment and local wildlife and it should be protected and used to serve the public good, and not for the benefit of the livestock industry.

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Thank you, Elaine

#5880

Name: bullock, tammy

Correspondence: why is the tule elk being hunted to make room for cattle this unexceptable and needs to stop the cattlemen need to feed their own cattle and stay off public lands and national parks

sincerely

tami bullock

#5881

Name: Hern, Avie

Correspondence: It's bad enough that ranchers are allowed to graze their livestock on public lands in exchange for token fees - - which some of them them even refuse to pay - - but to kill native wildlife that are an essential element of the land's ecology for the benefit of ranchers who should be have the resources to buy their animals feed should not be permitted.

#5882

Name: Mandal, Atashi

Correspondence: I am writing to urge the National Park Service to discontinue the grazing of beef and dairy cattle at Point Reyes National Seashore. This precious area has been damaged by livestock grazing which poses a threat to the environment and local wildlife and it should be protected and used to serve the public good, and not for the benefit of the livestock industry.

I strongly oppose Option B and any other proposal that would be fatal to Tule Elk or other wildlife to the benefit of ranching operations, and encourage the agency to adopt Option F to discontinue grazing and allow members of the public to enjoy this beautiful park and to be enriched with opportunities to visit and appreciate this special place.

#5883

Name: Sanford, Julie

Correspondence: .

I am writing to urge the National Park Service to discontinue the grazing of beef and dairy cattle at Point Reyes National Seashore. This precious area has been damaged by livestock grazing which poses a threat to the environment and local wildlife and it should be protected and used to serve the public good, and not for the benefit of the livestock industry.

I strongly oppose Option B and any other proposal that would be fatal to Tule Elk or other wildlife to the benefit of ranching operations, and encourage the agency to adopt Option F to discontinue grazing and allow members of the public to enjoy this beautiful park and to be enriched with opportunities to visit and appreciate this special place.

#5884

Name: Trice, Billy

Correspondence: I urge you to protect the elks at Point Reyes.

#5885

Name: Sullivan, Mary

Correspondence: I am urging the National Park Service to ADOPT OPTION "F" TO DISCONTINUE leasing the land for grazing beef and dairy cattle at Point Reyes National Seashore. Point Reyes National Seashore is a national treasure. This land should be protected and preserved for the public to enjoy as well as for the protection of the environment and local wildlife. I STRONGLY OPPOSE OPTION B and any other proposal that would kill the Tule Elk or other wildlife for the benefit of the cattle industry.

#5886

Name: Brasure, Trudy

Correspondence: I am writing to urge the National Park Service to discontinue the grazing of beef and dairy cattle at Point Reyes National Seashore. This precious area has been damaged by livestock grazing which poses a threat to the environment and local wildlife and it should be protected and used to serve the public good, and not for the benefit of the livestock industry.

I strongly oppose Option B and any other proposal that would be fatal to Tule Elk or other wildlife to the benefit of ranching operations, and encourage the agency to adopt Option F to discontinue grazing and allow members of the public to enjoy this beautiful park and to be enriched with opportunities to visit and appreciate this special place.

#5887

Name: Abrams , Allan

Correspondence: I and my family have vacationed at Pt. Reyes National Seashore (PRNS) annually for the past 6 years. We have visited every natural and manmade point of interest on the Pt.Reyes peninsula and surrounding natural areas in Marin County. According to the NPS Report on the Tule Elk reintroduction to PRNS, there is a scientific consensus that a healthy ecological balance can be maintained on existing wild range land, if the elk herd is limited to about 440 head.

What is happening to the local ecology where 5000 cattle graze? How has the numbers of commercial beef cattle increased since the elk were reintroduced?

I AM ABSOLUTELY AGAINST ANY REDUCTION OF THE ELK HERD AT PRNS BY FATAL MEANS OR BY TRANSPLANTING THEM TO OTHER WILD AREAS IF ITS GOAL IS TO MAINTAIN OR INCREASE THE EXISTING BEEF CATTLE FARMING PRACTICES.

#5888

Name: Bruinsma , Pamela

Correspondence: Cattle grazing is exhausting our environment. Please reconsider renewing any leases on this land regarding cattle. Let our native elk remain their natural habitat. Say NO to big \$\$\$, and preserve our land and resources. Thank You

#5889

Name: morgan, nancy

Correspondence: It is time the cattle were taken off all public lands. Only raise the number of cattle that your personal land can support. What gives you the right to force wildlife to give up their land so you can lease it. Keep your greedy money and stay off our public lands. You slaughter wolves and other wildlife on their own land and slaughter the wild horses for the same reason. STAY off my PUBLIC LAND and use your own.

#5890

Name: Villegas , Christine

Correspondence: Please remove the cattle and restore the land to its natural state.

#5891

Name: Meraz, Mary

Correspondence: I am writing to urge the National Park Service to discontinue the grazing of beef and dairy cattle at Point Reyes National Seashore. This precious area has been damaged by livestock grazing which poses a threat to the environment and local wildlife and it should be protected and used to serve the public good, and not for the benefit of the livestock industry.

I strongly oppose Option B and any other proposal that would be fatal to Tule Elk or other wildlife to the benefit of ranching operations, and encourage the agency to adopt Option F to discontinue grazing and allow members of the public to enjoy this beautiful park and to be enriched with opportunities to visit and appreciate this special place.

#5892

Name: Dapore, Wendy

Correspondence: I am writing to urge the National Park Service to discontinue the grazing of beef and dairy cattle at Point Reyes National Seashore. This precious area has been damaged by livestock grazing which poses a threat to the environment and local wildlife and it should be protected and used to serve the public good, and not for the benefit of the livestock industry.

#5893

Name: Oppenheimer, Peter

Correspondence: I'm writing to support the public access and bicycling improvements outlined under Alternatives B, C, D, E, and F. I strongly support proposals that would lead to the planning and implementation of bicycling routes on trails, ranch roads, and pathways throughout the planning area, including but not limited to: 1) a connection between Devil's Gulch and Platform Bridge Road using existing ranch roads, 2) a connection between Bolinas Ridge Trail at Olema Hill and Point Reyes Station to serve as an interim connection for the Cross Marin Trail, 3) a connection between Bolinas Ridge Trail and Five Brooks Stables using existing ranch roads 4) a connection between Drakes Estero and Abbotts Lagoon Trail using existing ranch roads, 5) a connection between Marshall Beach Trailhead and Pierce Point Road using existing ranch roads, and 6) an Estero Trail loop using existing ranch roads. I encourage NPS to collaborate with ranchers and other stakeholders to educate the public and address concerns related to public access on working ranch lands.

The improvements outlined above would enable and encourage me to visit the Seashore more regularly-and by bike, rather than car. I would feel much safer riding in the Seashore and surrounding areas on trails, pathways, and ranch roads, rather than on roads shared with fast-moving vehicular traffic. Bicycling opportunities are currently very limited and fragmented, so any improvements in connectivity and the creation of new loop options would enable me to enjoy more of the Seashore and surrounding areas by bike.

#5894

Name: N/A, N/A

Correspondence: I am writing to urge the National Park Service to discontinue the grazing of beef and dairy cattle at Point Reyes National Seashore. This precious area has been damaged by livestock grazing which poses a threat to the environment and local wildlife and it should be protected and used to serve the public good, and not for the benefit of the livestock industry.

I strongly oppose Option B and any other proposal that would be fatal to Tule Elk or other wildlife to the benefit of ranching operations, and encourage the agency to adopt Option F to discontinue grazing and allow members of the public to enjoy this beautiful park and to be enriched with opportunities to visit and appreciate this special place.

#5895

Name: Burns, Nora

Correspondence: I am saddened and disturbed that the Tule elk that I have been fortunate enough to experience might now be slaughtered to make room for increasing cattle deployment. It is bad enough that we over burden the area with more herds of cattle for our over consumption of animal meat which is cruel as well as increasing climate change. Killing Tule elk is not the answer. Changing the way we think away from over consumption of animal meat to a healthier diet would be a first step to saving the planet and the natural resources that are around us. We do not need more cattle and more methane gas!

Thank you

Nora Burns

#5896

Name: Karaba, Tammy

Correspondence: I am writing to urge the National Park Service to discontinue the grazing of beef and dairy cattle at Point Reyes National Seashore. This precious area has been damaged by livestock grazing which poses a threat to the environment and local wildlife and it should be protected and used to serve the public good, and not for the benefit of the livestock industry.

I strongly oppose Option B and any other proposal that would be fatal to Tule Elk or other wildlife to the benefit of ranching operations, and encourage the agency to adopt Option F to discontinue grazing and allow members of the public to enjoy this beautiful park and to be enriched with opportunities to visit and appreciate this special place.

#5897

Name: Brenza, Tina

Correspondence: Please end livestock grazing at Point Reyes National Park and allow this precious land to remain as wildlife habitat and to be used for the public good, not for the benefit of the livestock industry.

#5898

Name: Watkins, Anita

Correspondence: I am writing to urge the National Park Service to discontinue the grazing of beef and dairy cattle at Point Reyes National Seashore. This precious area has been damaged by livestock grazing which poses a threat to the environment and local wildlife and it should be protected and used to serve the public good, and not for the benefit of the livestock industry.

I strongly oppose Option B and any other proposal that would be fatal to Tule Elk or other wildlife to the benefit of ranching operations, and encourage the agency to adopt Option F to discontinue grazing and allow members of the public to enjoy this beautiful park and to be enriched with opportunities to visit and appreciate this special place.

#5899

Name: McCowan, Tracy

Correspondence: Please end livestock grazing at Point Reyes National Park and to allow this precious land to remain as wildlife habitat and to be used for the public good, not for the benefit of the livestock industry. Thank you.

#5900

Name: Katz, Barry

Correspondence: The Tule Elk is among those species threatened if we allow our State and National Parks, i.e., Point Reyes, to be misused for cattle grazing. Of all the short sided stupidest ideas this one wins the prize. Let the ranchers graze their cattle on other property like their own. Making money or raising livestock should not hold priority over preserving the ecosystem for this beautiful area of California. This is not a wise use of public lands created as a preserve for plants and animals. And we certainly don't need methane polluting cattle in this case contributing to the global warming of the planet. This conflict has been going on for more than a hundred years in this country. The beef lobby should quit trying to buy off the legislature and the respective bureaucrats. That's corruption and it needs to stop now!

#5901

Name: Clark, Bridget

Correspondence: As a native to Marin, I'm writing to support the public access and bicycling improvements outlined under Alternatives B, C, D, E, and F. I strongly support proposals that would lead to the planning and implementation of bicycling routes on trails, ranch roads, and pathways throughout the planning area, including but not limited to: 1) a connection between Devil's Gulch and Platform Bridge Road using existing ranch roads, 2) a connection between Bolinas Ridge Trail at Olema Hill and Point Reyes Station to serve as an interim connection for the Cross Marin Trail, 3) a connection between Bolinas Ridge Trail and Five Brooks Stables using existing ranch roads 4) a connection between Drakes Estero and Abbotts Lagoon Trail using existing ranch roads, 5) a connection between Marshall Beach Trailhead and Pierce Point Road using existing ranch roads, and 6) an Estero Trail loop using existing ranch roads. I encourage NPS to collaborate with ranchers and other stakeholders to educate the public and address concerns related to public access on working ranch lands.

The improvements outlined above would enable and encourage me to visit the Seashore more regularly-and by bike, rather than car. I would feel much safer riding in the Seashore and surrounding areas on trails, pathways, and ranch roads, rather than on roads shared with fast-moving vehicular traffic. Bicycling opportunities are fragmented, so any improvements in connectivity and the creation of new loop options would enable me to enjoy more of the Seashore and surrounding areas by bike.

Thank you for your consideration.

Bridget Clark

#5902

Name: Jamil, Sana

Correspondence: I am writing to urge the National Park Service to discontinue the grazing of beef and dairy cattle at Point Reyes National Seashore. This precious area has been damaged by livestock grazing which poses a threat

to the environment and local wildlife and it should be protected and used to serve the public good, and not for the benefit of the livestock industry.

I strongly oppose Option B and any other proposal that would be fatal to Tule Elk or other wildlife to the benefit of ranching operations, and encourage the agency to adopt Option F to discontinue grazing and allow members of the public to enjoy this beautiful park and to be enriched with opportunities to visit and appreciate this special place.

#5903

Name: N/A, N/A

Correspondence: I am writing to urge the National Park Service to discontinue the grazing of beef and dairy cattle at Point Reyes National Seashore. This precious area has been damaged by livestock grazing which poses a threat to the environment and local wildlife and it should be protected and used to serve the public good, and not for the benefit of the livestock industry.

I strongly oppose Option B and any other proposal that would be fatal to Tule Elk or other wildlife to the benefit of ranching operations, and encourage the agency to adopt Option F to discontinue grazing and allow members of the public to enjoy this beautiful park and to be enriched with opportunities to visit and appreciate this special place.

#5904

Name: Lomon, Deirdre

Correspondence: Please!!!! I love Point Reyes! I am writing to urge the National Park Service to discontinue the grazing of beef and dairy cattle at Point Reyes National Seashore. This precious area has been damaged by livestock grazing which poses a threat to the environment and local wildlife and it should be protected and used to serve the public good, and not for the benefit of the livestock industry.

I strongly oppose Option B and any other proposal that would be fatal to Tule Elk or other wildlife to the benefit of ranching operations, and encourage the agency to adopt Option F to discontinue grazing and allow members of the public to enjoy this beautiful park and to be enriched with opportunities to visit and appreciate this special place.

#5905

Name: van every, kathleen

Correspondence: Point Reyes is not a farm! The land belongs to the Elk & the visitors & locals who love love it. Send the cows home. Thank-You

#5906

Name: Manley, Harriot

Correspondence: Thanks for considering options for improving access and making safe routes for all kinds of bicycles in Point Reyes National Seashore. I grew up in Marin, and know what a treasured asset this gorgeous park is, for visitors and locals. If we can improve access without damaging the park or threatening wildlife, I'm all for it. I suspect that improving and enhancing existing routes through farmlands could actually reduce impacts. Win win all around.

In addition, I support the efforts of Marin's informed and passionate cycling community, which supports these points:



I'm writing to support the public access and bicycling improvements outlined under Alternatives B, C, D, E, and F. I strongly support proposals that would lead to the planning and implementation of bicycling routes on trails, ranch roads, and pathways throughout the planning area, including but not limited to: 1) a connection between Devil's Gulch and Platform Bridge Road using existing ranch roads, 2) a connection between Bolinas Ridge Trail at Olema Hill and Point Reyes Station to serve as an interim connection for the Cross Marin Trail, 3) a connection between Bolinas Ridge Trail and Five Brooks Stables using existing ranch roads 4) a connection between Drakes Estero and Abbotts Lagoon Trail using existing ranch roads, 5) a connection between Marshall Beach Trailhead and Pierce Point Road using existing ranch roads, and 6) an Estero Trail loop using existing ranch roads. I encourage NPS to collaborate with ranchers and other stakeholders to educate the public and address concerns related to public access on working ranch lands.

The improvements outlined above would enable and encourage me to visit the Seashore more regularly-and by bike, rather than car. I would feel much safer riding in the Seashore and surrounding areas on trails, pathways, and ranch roads, rather than on roads shared with fast-moving vehicular traffic. Bicycling opportunities are currently very limited and fragmented, so any improvements in connectivity and the creation of new loop options would enable me to enjoy more of the Seashore and surrounding areas by bike.

Thank you!!!!

#5907

Name: Sands, Jack

Correspondence: I am writing to urge the National Park Service to discontinue the grazing of beef and dairy cattle at Point Reyes National Seashore. This precious area has been damaged by livestock grazing which poses a threat to the environment and local wildlife and it should be protected and used to serve the public good, and not for the benefit of the livestock industry.

I strongly oppose Option B and any other proposal that would be fatal to Tule Elk or other wildlife to the benefit of ranching operations, and encourage the agency to adopt Option F to discontinue grazing and allow members of the public to enjoy this beautiful park and to be enriched with opportunities to visit and appreciate this special place.

#5908

Name: Goble , Allyson

Correspondence: Killing native Tule Elk to make oom for grazing beef and dairy cattle?? Insanity! Especially when the tides are turning for more plant-based diets. Especially when the public is now getting hip to the money and evil in Big Ag! NO!!

#5909

Name: Frame, Linda

Correspondence: Please do not allow the cattle industry access to Point Reyes. The wildlife needs to be protected. The cattle do not need to graze on anymore public land.

#5910

Name: Swanson, Maureen

Correspondence: Please do not use the Point Reyes land for raising cattle. I have visited this area since I was in my 20's and am now 60. I always enjoyed the natural habitat and hoping to spot wildlife. Don't ruin it! The world is changing. People are turning to healthier alternatives and meat is not one of them. We do not NEED more beef production. It doesn't make business sense. More people travel to that area to see wildlife than cattle. I just wouldn't bother to visit any longer so it's lost revenue from a tourist standpoint and gains nothing with beef

becoming less and less a part of a healthy diet. Or turn the cows loose to graze if they will mix with the elk and live out their lives there as a refuge. Now THAT I would visit!

#5911

Name: Miller, Joe

Correspondence: I am writing to urge the National Park Service to discontinue the grazing of beef and dairy cattle at Point Reyes National Seashore. This area has been damaged by livestock grazing which poses a threat to the environment and local wildlife. The wildlife should be protected and land should be used to serve the public good.

I strongly oppose Option B and any other proposal that would be fatal to Tule Elk or other wildlife to the benefit of ranching operations, and encourage the agency to adopt Option F to discontinue grazing and allow members of the public to enjoy this beautiful park and to be enriched with opportunities to visit and appreciate this special place.

#5912

Name: Boyd, Jeannie

Correspondence: I am writing to urge the National Park Service to discontinue the grazing of beef and dairy cattle at Point Reyes National Seashore. This precious area has been damaged by livestock grazing which poses a threat to the environment and local wildlife and it should be protected and used to serve the public good, and not for the benefit of the livestock industry.

I strongly oppose Option B and any other proposal that would be fatal to Tule Elk or other wildlife to the benefit of ranching operations, and encourage the agency to adopt Option F to discontinue grazing and allow members of the public to enjoy this beautiful park and to be enriched with opportunities to visit and appreciate this special place.

#5913

Name: Johnston, James

Correspondence: My name is James Johnston and I live in the San Francisco Bay Area. My wife & I have enjoyed visiting Point Reyes National Seashore on a number of occasions. Major ranching operations run by private owners, however, have not enhanced our enjoyment. The ranches, apart from the abandoned and interpretive Pierce Point Ranch, are private and not a part of the park I can freely explore and visit due to the fact that they are active, commercial ranches. Most importantly, it's clear from hiking through some of the areas that the cattle significantly degrade the ecosystem. Vegetation is trampled and soil is compacted, and considerable waste from the animals is scattered on the landscape. Picking my way through cattle manure was not great. Native tule elk, which were hunted to near-extinction, are forced to compete with a huge number of cattle for limited land.

I am therefore not in favor of the park's preferred plan. My preference is for alternative F, which is to completely phase out all ranching from Pt Reyes. Barring that, any plan which significantly reduces ranching from the status quo would be better than the NPS-preferred alternative B.

\* The NPS has a mandate to preserve cultural as well as natural features, for the general benefit of current and future generations who visit the park. The ranch buildings can be preserved, and interpretive exhibits set up - similar to Pierce Point Ranch. Very small numbers of cattle - perhaps a dozen or so at most - could even be kept in a small space so that visitors can get a better sense of what an active ranch was like. It is not necessary nor desirable, however, to keep thousands of cattle in a full-scale commercial ranching operation which is not generally open to visitors.

\* Pt Reyes is not the only location in California, or even Marin County, where ranching can take place. It is, however, one of the very few places left in the United States with undeveloped shoreline outside of Alaska. While many people consume the commercial products produced at Pt Reyes, these benefits can be obtained from raising cattle elsewhere, not on a national seashore and NPS site. It would be best to allow the park to recover to a more natural state, as it would be one of very few ocean-side places like that left in the United States.

\* Continued cattle grazing causes significant local environmental damage. Cattle manure pollutes the water. The vegetation is trampled, which reduces biodiversity and prevents the land from returning to the undisturbed state it was in before it was ranched. Cattle outnumber tule elk by a significant margin. The tule elk herd is kept to a very unnaturally small size in order to make room for cattle. If anything, this is severely unbalanced and the margin should be reversed, with the elk herd allowed to grow considerably.

\* Commercial cattle leasing is not contributing to the visitor experience. If anything, it detracts from it as visitors are not welcome on ranches. Alternative F clearly spells out that visitor facilities would be improved the most under that proposal - many would benefit instead of a select few commercial farmers. Existing camping facilities at Pt Reyes are extremely limited and competitive. Establishing new ones, as outlined in Alternative F, would significantly improve the visitor experience.

\* The park was established with the provision that existing ranches would be phased out after 25 years. The land was never intended to be leased out in perpetuity. This policy of continued leasing is not consistent with what took place in other NPS sites when private landowners were bought out. The National Park Service is not the Bureau of Land Management and should not be run as such. What is the difference between a National Park Service site and a BLM site if both are leasing land in perpetuity for commercial agricultural operations? I have never seen that done at other NPS sites I have visited - and I've been to many. Elsewhere, I usually see interpretive signs by old dwellings which were vacated long ago. That is how it should be here.

\* Expanding ranching operations by adding crops and other small livestock brings further negative environmental impacts to the park while offering the ranchers an increase in income. The National Park Service is not a welfare organization. The rights of the general public to enjoy the park and have it maintained in a pristine state should not be degraded for the financial benefit of a few private farmers running commercial agricultural operations.

\* Beef and dairy cattle are one of the leading causes of greenhouse gasses in our food supply. The National Park Service has many an exhibit explaining the problems we collectively face from global warming. As I recall, I found one such exhibit at Pt Reyes on a recent visit. The Pt Reyes NPS web site even has a page explaining how the Seashore is "doing its part" by using electric vehicles and solar panels. Yet, the climate impact of all the cattle farming vastly outweighs these small token things the park service is doing. If the park service is serious about doing its part to fight climate change, it must stop leasing to one of the largest polluters on the planet: animal agriculture. The EIS does not discuss how the greenhouse gasses from ranching are being offset in order to prevent further damage to our planet, and therefore, Pt Reyes itself.

In summary, please discontinue all leases to commercial ranching operations.

#5914

Name: Berman, Juliann

Correspondence: No cattle

#5915

Name: Delaney, Jeri

Correspondence: NPS,

I am writing to urge the adoption of plan F in regard to the Point Reyes Seashore matter. The preservation of native wild species must take precedence over farming and ranching activities. Grazing negatively affects ecosystems, causing water pollution and soil erosion, spreading invasive species and disease, and harming endangered species.

Thank you for your consideration.

#5916

Name: N/A, Sarah

Correspondence: Hello,

Please suspend livestock grazing on these lands, except when needed to help control brush in spring and early summer before fire season begins. And PLEASE do not go in favor of Proposition B and kill these poor Tule Elk! Please keep the wild life alive! Cattle will come and go but, our wild life is more fragile!

Thank you!

#5917

Name: Kuegeman, Sofia

Correspondence: I am writing to urge the National Park Service to discontinue the grazing of beef and dairy cattle at Point Reyes National Seashore. This precious area has been damaged by livestock grazing which poses a threat to the environment and local wildlife and it should be protected and used to serve the public good, and not for the benefit of the livestock industry.

I strongly oppose Option B and any other proposal that would be fatal to Tule Elk or other wildlife to the benefit of ranching operations, and encourage the agency to adopt Option F to discontinue grazing and allow members of the public to enjoy this beautiful park and to be enriched with opportunities to visit and appreciate this special place.

#5918

Name: Masters, Mathilda

Correspondence: I am writing to urge the National Park Service to discontinue the grazing of beef and dairy cattle at Point Reyes National Seashore. This precious area has been damaged by livestock grazing which poses a threat to the environment and local wildlife and it should be protected and used to serve the public good, and not for the benefit of the livestock industry.

#5919

Name: Kassin, Alec

Correspondence: As a San Anselmo native and NorCal High School Mountain Bike League alum, I'm writing to support the public access and bicycling improvements outlined under Alternatives B, C, D, E, and F.

I strongly support proposals that would lead to the planning and implementation of bicycling routes on trails, ranch roads, and pathways throughout the planning area, including but not limited to: 1) a connection between Devil's Gulch and Platform Bridge Road using existing ranch roads, 2) a connection between Bolinas Ridge Trail at Olema Hill and Point Reyes Station to serve as an interim connection for the Cross Marin Trail, 3) a connection between Bolinas Ridge Trail and Five Brooks Stables using existing ranch roads 4) a connection between Drakes Estero and Abbotts Lagoon Trail using existing ranch roads, 5) a connection between Marshall Beach Trailhead and Pierce Point Road using existing ranch roads, and 6) an Estero Trail loop using existing ranch roads. I

encourage NPS to collaborate with ranchers and other stakeholders to educate the public and address concerns related to public access on working ranch lands.

The improvements outlined above would enable and encourage me to visit the Seashore more regularly-and by bike, rather than car. I would feel much safer riding in the Seashore and surrounding areas on trails, pathways, and ranch roads, rather than on roads shared with fast-moving vehicular traffic. Bicycling opportunities are currently very limited and fragmented, so any improvements in connectivity and the creation of new loop options would enable me to enjoy more of the Seashore and surrounding areas by bike.

Sincerely, Alec

#5920

Name: N/A, N/A

Correspondence: I am writing to urge the National Park Service to discontinue the grazing of beef and dairy cattle at Point Reyes National Seashore. This precious area has been damaged by livestock grazing which poses a threat to the environment and local wildlife and it should be protected and used to serve the public good, and not for the benefit of the livestock industry.

I strongly oppose Option B and any other proposal that would be fatal to Tule Elk or other wildlife to the benefit of ranching operations, and encourage the agency to adopt Option F to discontinue grazing and allow members of the public to enjoy this beautiful park and to be enriched with opportunities to visit and appreciate this special place.

#5921

Name: Michael, Veronica

Correspondence: Please save this sacred space from the encroachment of livestock. Point Reyes has its magic and deserves to be protected.

#5922

Name: Dearing, Shari

Correspondence: I am writing to urge the National Park Service to discontinue the grazing of beef and dairy cattle at Point Reyes National Seashore. This precious area has been damaged by livestock grazing which poses a threat to the environment and local wildlife and it should be protected and used to serve the public good, and not for the benefit of the livestock industry.

I strongly oppose Option B and any other proposal that would be fatal to Tule Elk or other wildlife to the benefit of ranching operations, and encourage the agency to adopt Option F to discontinue grazing and allow members of the public to enjoy this beautiful park and to be enriched with opportunities to visit and appreciate this special place.

#5923

Name: Tomasello, Pela

Correspondence: I strongly oppose Option B and any other proposal that would be fatal to Tule Elk or other wildlife to the benefit of ranching operations, and encourage the agency to adopt Option F to discontinue grazing and allow members of the public to enjoy this beautiful park and to be enriched with opportunities to visit and appreciate this special place.

#5924

Name: Driver, Desiree

Correspondence: Tule Elk at Point Reyes National Seashore - I strongly urge you to adopt Alternative F as your solution for the Tule Elk, which would discontinue farming and ranching opportunities in the park and expand visitor opportunities. The preservation of native wild species must take precedence over farming and ranching activities. May I remind you that grazing negatively affects ecosystems, causing water pollution and soil erosion, spreading invasive species and disease, and harming endangered species.

#5925

Name: Hoffman, Marc

Correspondence: Point Reyes National Seashore in California was established as a national park.

I ask you to adopt Alternative F, which would discontinue farming and ranching opportunities in the park and expand visitor opportunities.

The preservation of native wild species must take precedence over farming and ranching activities. Grazing negatively affects ecosystems, causing water pollution and soil erosion, spreading invasive species and disease, and harming endangered species.

#5926

Name: Chang, Vivian

Correspondence: I am writing to urge the National Park Service to discontinue the grazing of beef and dairy cattle at Point Reyes National Seashore. This precious area has been damaged by livestock grazing which poses a threat to the environment and local wildlife and it should be protected and used to serve the public good, and not for the benefit of the livestock industry.

I strongly oppose Option B and any other proposal that would be fatal to Tule Elk or other wildlife to the benefit of ranching operations, and encourage the agency to adopt Option F to discontinue grazing and allow members of the public to enjoy this beautiful park and to be enriched with opportunities to visit and appreciate this special place.

#5927

Name: Campbell, Susan

Correspondence: I am writing to urge the National Park Service to discontinue the grazing of beef and dairy cattle at Point Reyes National Seashore. This precious area has been damaged by livestock grazing which poses a threat to the environment and local wildlife and it should be protected and used to serve the public good, and not for the benefit of the livestock industry.

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#5928

Name: Quiggle, Renee

Correspondence: Precious land is being destroyed along with our health. Promote plant based diet to save our planet.,

#5929

Name: Giandomenica, Steve

Correspondence: I'm writing to support the public access and bicycling improvements outlined under Alternatives B, C, D, E, and F. I strongly support proposals that would lead to the planning and implementation of bicycling routes on trails, ranch roads, and pathways throughout the planning area, including but not limited to: 1) a connection between Devil's Gulch and Platform Bridge Road using existing ranch roads, 2) a connection between Bolinas Ridge Trail at Olema Hill and Point Reyes Station to serve as an interim connection for the Cross Marin Trail, 3) a connection between Bolinas Ridge Trail and Five Brooks Stables using existing ranch roads 4) a connection between Drakes Estero and Abbotts Lagoon Trail using existing ranch roads, 5) a connection between Marshall Beach Trailhead and Pierce Point Road using existing ranch roads, and 6) an Estero Trail loop using existing ranch roads. I encourage NPS to collaborate with ranchers and other stakeholders to educate the public and address concerns related to public access on working ranch lands.

The improvements outlined above would enable and encourage me to visit the Seashore more regularly-and by bike, rather than car. I would feel much safer riding in the Seashore and surrounding areas on trails, pathways, and ranch roads, rather than on roads shared with fast-moving vehicular traffic. Bicycling opportunities are currently very limited and fragmented, so any improvements in connectivity and the creation of new loop options would enable me to enjoy more of the Seashore and surrounding areas by bike.

#5930

Name: Ward, Melissa

Correspondence: The Tule Elk at Point Reyes National Seashore California; Killing of these Elk is morally and economically wrong. Our country is moving away from animal proteins which benefit health and environment. Don't allow these bullieranchers to have their way with public land. It doesn't belong to them! It belongs to the people. Do the RIGHT thing. Stand up!

#5931

Name: Maschan, Connie

Correspondence: I am writing to urge the National Park Service to discontinue the grazing of beef and dairy cattle at Point Reyes National Seashore. This precious area has been damaged by livestock grazing which poses a threat to the environment and local wildlife and it should be protected and used to serve the public good, and not for the benefit of the livestock industry.

I strongly oppose Option B and any other proposal that would be fatal to Tule Elk or other wildlife to the benefit of ranching operations, and encourage the agency to adopt Option F to discontinue grazing and allow members of the public to enjoy this beautiful park and to be enriched with opportunities to visit and appreciate this special place.

#5932

Name: Simmons , Julia

Correspondence: Please do not kill the elk so cattle can graze. Please consider the preciousness of their existence and the wellbeing of our planet.

#5933

Name: Kulczyk, David

Correspondence: livestock should be allowed in any National Park, Seashore or monument. To kill the few Tule Elk left on Earth for a handful of rancher is insanity.

#5934

Name: Miller, Vicki

Correspondence: Regarding Point Reyes land lease:

I strongly oppose Option B and any other proposal that would be fatal to Tule Elk or other wildlife to the benefit of ranching operations, and encourage the agency to adopt Option F to discontinue grazing and allow members of the public to enjoy this beautiful park and to be enriched with opportunities to visit and appreciate this special place.

If any options to graze cattle remain on the table, I strongly urge you to limit the number of head to the current 5,000 or less. Cattle ranching is not a benefit to the climate or the environment at Point Reyes.

Thank you for considering my comment.

#5935

Name: Kashuba, David

Correspondence: I'm writing to support the public access and bicycling improvements outlined under Alternatives B, C, D, E, and F. I strongly support proposals that would lead to the planning and implementation of bicycling routes on trails, ranch roads, and pathways throughout the planning area, including but not limited to: 1) a connection between Devil's Gulch and Platform Bridge Road using existing ranch roads, 2) a connection between Bolinas Ridge Trail at Olema Hill and Point Reyes Station to serve as an interim connection for the Cross Marin Trail, 3) a connection between Bolinas Ridge Trail and Five Brooks Stables using existing ranch roads 4) a connection between Drakes Estero and Abbotts Lagoon Trail using existing ranch roads, 5) a connection between Marshall Beach Trailhead and Pierce Point Road using existing ranch roads, and 6) an Estero Trail loop using existing ranch roads. I encourage NPS to collaborate with ranchers and other stakeholders to educate the public and address concerns related to public access on working ranch lands.

The improvements outlined above would enable and encourage me to visit the Seashore more regularly-and by bike, rather than car. I would feel much safer riding in the Seashore and surrounding areas on trails, pathways, and ranch roads, rather than on roads shared with fast-moving vehicular traffic. Bicycling opportunities are currently very limited and fragmented, so any improvements in connectivity and the creation of new loop options would enable me to enjoy more of the Seashore and surrounding areas by bike.

-David Kashuba

#5936

Name: N/A, N/A

Correspondence: I am writing to urge the National Park Service to discontinue the grazing of beef and dairy cattle at Point Reyes National Seashore. This precious area has been damaged by livestock grazing which poses a threat to the environment and local wildlife and it should be protected and used to serve the public good, and not for the benefit of the livestock industry.

I strongly oppose Option B and any other proposal that would be fatal to Tule Elk or other wildlife to the benefit of ranching operations, and encourage the agency to adopt Option F to discontinue grazing and allow members of the public to enjoy this beautiful park and to be enriched with opportunities to visit and appreciate this special place.

#5937

Name: Clinton, Arthur

Correspondence: I care about protecting California's wildlife. I have hiked in this area on numerous occasions and love seeing the elk. The first time I saw the elk, a few hundred feet from me, I was mystified. I want others to



be able to have that same feeling. I oppose the National Park Service's plan to kill native tule elk and expand commercial agriculture in Point Reyes National Seashore and Golden Gate National Recreation Area. I urge the National Park Service to instead restore the lands for wild animal habitat.

We should prioritize the preservation of our public lands and wildlife, not the economic interests of private ranchers. These commercial cattle ranches have serious negative environmental impacts on the park - polluting waterways, causing soil erosion, and harming the many endangered and threatened animals who live on Point Reyes. National parks exist to protect our natural resources and native wildlife. This park should be managed accordingly.

#5938

Name: Roos, Irene

Correspondence: Please stop harming wildlife.

#5939

Name: Harned, Jacquie

Correspondence: I am writing to urge the National Park Service to discontinue the grazing of beef and dairy cattle at Point Reyes National Seashore. This precious area has been damaged by livestock grazing which poses a threat to the environment and local wildlife and it should be protected and used to serve the public good, and not for the benefit of the livestock industry.

I strongly oppose Option B and any other proposal that would be fatal to Tule Elk or other wildlife to the benefit of ranching operations, and encourage the agency to adopt Option F to discontinue grazing and allow members of the public to enjoy this beautiful park and to be enriched with opportunities to visit and appreciate this special place.

Please do not put money before lives.

Thank you!!!

#5940

Name: Venezia, Rachael

Correspondence: Please don't renew the lease! Protect the wildlife and don't kill any wildlife! Cattle and the meat industry are ruining our planet.

#5941

Name: Blair, Jen

Correspondence: I am writing to urge the National Park Service to discontinue the grazing of beef and dairy cattle at Point Reyes National Seashore. This precious area has been damaged by livestock grazing which poses a threat to the environment and local wildlife and it should be protected and used to serve the public good, and not for the benefit of the livestock industry.

I strongly oppose Option B and any other proposal that would be fatal to Tule Elk or other wildlife to the benefit of ranching operations, and encourage the agency to adopt Option F to discontinue grazing and allow members of the public to enjoy this beautiful park and to be enriched with opportunities to visit and appreciate this special place.

No grazing on public lands. I have enjoyed this space for most of my life. I'd hate to see it turn into an agricultural space.

#5942

Name: Martins-Fernandes, Ana-Paula

Correspondence: I am writing to urge the National Park Service to discontinue the grazing of beef and dairy cattle at Point Reyes National Seashore. This precious area has been damaged by livestock grazing which poses a threat to the environment and local wildlife and it should be protected and used to serve the public good, and not for the benefit of the livestock industry.

I strongly oppose Option B and any other proposal that would be fatal to Tule Elk or other wildlife to the benefit of ranching operations, and encourage the agency to adopt Option F to discontinue grazing and allow members of the public to enjoy this beautiful park and to be enriched with opportunities to visit and appreciate this special place.

#5943

Name: Miller, Carrie

Correspondence: I agree with the text provided by Farm Sanctuary below, but would like to state I am personally opposed to the act of killing wildlife to provide resources for ag-industry meat animals in a time we should be curtailing our production and consumption of said livestock.

I am writing to urge the National Park Service to discontinue the grazing of beef and dairy cattle at Point Reyes National Seashore. This precious area has been damaged by livestock grazing which poses a threat to the environment and local wildlife and it should be protected and used to serve the public good, and not for the benefit of the livestock industry.

I strongly oppose Option B and any other proposal that would be fatal to Tule Elk or other wildlife to the benefit of ranching operations, and encourage the agency to adopt Option F to discontinue grazing and allow members of the public to enjoy this beautiful park and to be enriched with opportunities to visit and appreciate this special place.

#5944

Name: McCanless, Tamara

Correspondence: I would like to ask that you don't use Plan B to kill off the Point Reyes Tule Elk so cattle can graze on these public lands. The cattle degrade the land and cost tax payers money since we subsidize the extremely cheap price the ranchers pay for this grazing . Please leave the native wildlife on the land and don't renew the grazing licenses. Thank you, Tamara McCanless

#5945

Name: Doherty, Pat

Correspondence: cattle grazing is destroying more land than any other element . Certainly wild horses ARE NOT doing what cattle are doing yet they are being removed and killed off because of cattle ranchers. DO NOT ALLOW THIS .

#5946

Name: Giffen, Phoenix

Correspondence: All living things deserve to be happy, healthy and free. Stop destroying wildlife!

#5947

Name: Selden, Tania

Correspondence: Do not kill the elk. The beef industry and the dairies do not belong on Pt. Reyes.

#5948

Name: Monroe, Amy

Correspondence: I am writing to urge the National Park Service to discontinue the grazing of beef and dairy cattle at Point Reyes National Seashore. This precious area has been damaged by livestock grazing which poses a threat to the environment and local wildlife and it should be protected and used to serve the public good, and not for the benefit of the livestock industry.

I strongly oppose Option B and any other proposal that would be fatal to Tule Elk or other wildlife to the benefit of ranching operations, and encourage the agency to adopt Option F to discontinue grazing and allow members of the public to enjoy this beautiful park and to be enriched with opportunities to visit and appreciate this special place. Amy

#5949

Name: Schiowitz, Julie

Correspondence: Please do not kill any wildlife for grazing cattle. Please keep the area habitable for all wildlife so our children will be able to enjoy it.

Thank you!

#5950

Name: Roberts, Julie

Correspondence: I am writing to urge the National Park Service to discontinue the grazing of beef and dairy cattle at Point Reyes National Seashore. This precious area has been damaged by livestock grazing which poses a threat to the environment and local wildlife and it should be protected and used to serve the public good, and not for the benefit of the livestock industry.

I strongly oppose Option B and any other proposal that would be fatal to Tule Elk or other wildlife to the benefit of ranching operations, and encourage the agency to adopt Option F to discontinue grazing and allow members of the public to enjoy this beautiful park and to be enriched with opportunities to visit and appreciate this special place.

#5951

Name: Martin, Ken

Correspondence: Leave the Elk alone... enough with the cattle already! All wildlife is being wiped out because of ranches and their cattle. It's time to consider the other animals that need to survive in 'their home' without killing them for ranchers!

#5952

Name: arquilla, vance

Correspondence: it is so important to not allow industrial cattle to destroy the land the wild life there...,

#5953

Name: Ericson, Hilarie

Correspondence: stop

#5954

Name: Robichek, Laura

Correspondence: We go to Point Reyes to enjoy its beauty, and Tule elk are an important part of the beauty of Point Reyes. They were recovered after successful native ecosystem restoration, a key element of the Park Service's mission.

It took a lot of time, money and effort to restore tule elk to Point Reyes, the only national park where they live.

Tule elk are beautiful animals and should be allowed to roam free and forage in the park - not shot, removed, fenced or treated as problem animals.

Thank you.

#5955

Name: BOIS, MYRIAM

Correspondence: don t touch this animals and all others

#5956

Name: Rush, Claude

Correspondence: Seriously? Are they working hand in hand with the Brazilian President? When greed is leading the world, respect vanishes. Shame on these scumbags!

#5957

Name: Graves, Caryn

Correspondence: Tule elk are an important part of the landscape at Point Reyes. Their recovery is a result of successful native ecosystem restoration, which is a key element of the Park Service's mission. It's taken a lot of time, money and effort to restore tule elk to Point Reyes, the only national park where they live. Tule elk should be allowed to roam free and forage in the park - not shot, removed, fenced or treated as problem animals.

The Park Service shouldn't allow any new agricultural activities at Point Reyes. Planting artichokes or other row crops will attract birds. And introducing sheep, goats, pigs or chickens will attract native predators such as coyotes, bobcats and foxes. Expanded ranching would only create new wildlife conflicts.

#5958

Name: Conroy, Thomas

Correspondence: I am writing to urge the National Park Service to discontinue the grazing of beef and dairy cattle at Point Reyes National Seashore. This precious area has been damaged by livestock grazing which poses a threat to the environment and local wildlife and it should be protected and used to serve the public good, and not for the benefit of the livestock industry.

I strongly oppose Option B and any other proposal that would be fatal to Tule Elk or other wildlife to the benefit of ranching operations, and encourage the agency to adopt Option F to discontinue grazing and allow members of the public to enjoy this beautiful park and to be enriched with opportunities to visit and appreciate this special place.

#5959

Name: Lee, Peter

Correspondence: Cattle ranching produces Methane!

#5960

Name: Neuhauser, Alice

Correspondence: I am writing to urge the National Park Service to discontinue the grazing of beef and dairy cattle at Point Reyes National Seashore. This precious area has been damaged by livestock grazing which poses a threat to the environment and local wildlife and it should be protected and used to serve the public good, and not for the benefit of the livestock industry.

I strongly oppose Option B and any other proposal that would be fatal to Tule Elk or other wildlife to the benefit of ranching operations, and encourage the agency to adopt Option F to discontinue grazing and allow members of the public to enjoy this beautiful park and to be enriched with opportunities to visit and appreciate this special place.

#5961

Name: Dearing, Deb

Correspondence: Climate Change ....more cattle ??? Really???

#5962

Name: Koessel, Karl

Correspondence: The wildlife and natural scenery motivate at Point Reyes and other national parks enables city dwellers a chance to experience nature devoid of human construction. Point Reyes National Seashore is supposed to be managed under the Point Reyes Act for "maximum protection, restoration, and preservation of the natural environment." There's no mandate for prioritizing commercial agricultural leases on these public lands. Natural values, native wildlife, public access and enjoyment should take priority over commercial activities at Point Reyes. Tule elk are an important part of the landscape at Point Reyes. Their recovery is a result of successful native ecosystem restoration, which is a key element of the Park Service's mission. It's taken a lot of time, money and effort to restore tule elk to Point Reyes, the only national park where they live. Tule elk should be allowed to roam free and forage in the park - not shot, removed, fenced or treated as problem animals. Right now the Point Reyes ranches enjoy not only subsidized grazing fees and housing, but also taxpayer-funded infrastructure and road improvements, and publicly funded projects. But commercial activities at Point Reyes should be required to accommodate native wildlife - not the other way around. The Park Service shouldn't allow any new agricultural activities at Point Reyes. Planting artichokes or other row crops will attract birds. And introducing sheep, goats, pigs or chickens will attract native predators such as coyotes, bobcats and foxes. Expanded ranching would only create new wildlife conflicts. Cattle ranching should only be allowed if it's consistent with preserving the natural environment. And agricultural activities such as mowing shouldn't be allowed in park areas where they harm endangered species or wildlife habitat, impair water quality, cause excessive erosion or spread invasive plants/diseases. Cattle are the seashore's primary source of greenhouse gases. So the Park Service's preferred alternative is inconsistent with its own "Climate Friendly Parks" plan.

Reject this proposed plan. Do not allow grazing to impact Point Reyes.

Thank you for your attention to my opinion.

Sincerely,

Karl Koessel

#5963

Name: Efimova, Valeriya

Correspondence: Please accept this as a comment opposing giving land to cattle at the expense of native animals. Tule elk are an important part of the landscape at Point Reyes. Their recovery is a result of successful native ecosystem restoration, which is a key element of the Park Service's mission. It's taken a lot of time, money and effort to restore tule elk to Point Reyes, the only national park where they live. Tule elk should be allowed to roam free and forage in the park - not shot, removed, fenced or treated as problem animals. Park Service shouldn't allow any new agricultural activities at Point Reyes. Planting artichokes or other row crops will attract birds. And introducing sheep, goats, pigs or chickens will attract native predators such as coyotes, bobcats and foxes. Expanded ranching would only create new wildlife conflicts. Cattle ranching should only be allowed if it's consistent with preserving the natural environment. And agricultural activities such as mowing shouldn't be allowed in park areas where they harm endangered species or wildlife habitat, impair water quality, cause excessive erosion or spread invasive plants/diseases.

Thank you

#5964

Name: BROWN, JAMES

Correspondence: Point Reyes National Seashore is supposed to be managed under the Point Reyes Act for "maximum protection, restoration, and preservation of the natural environment." There's no mandate for prioritizing commercial agricultural leases on these public lands.

Natural values, native wildlife, public access, and enjoyment should take priority over commercial activities at Point Reyes.

Tule elk are an important part of the landscape at Point Reyes. Their recovery is a result of successful native ecosystem restoration, which is a key element of the Park Service's mission.

It's taken a lot of time, money and effort to restore tule elk to Point Reyes, the only national park where they live. Tule elk should be allowed to roam free and forage in the park - not shot, removed, fenced or treated as problem animals.

Right now the Point Reyes ranches enjoy not only subsidized grazing fees and housing, but also taxpayer-funded infrastructure and road improvements, and publicly funded projects. But commercial activities at Point Reyes should be required to accommodate native wildlife - not the other way around.

The Park Service shouldn't allow any new agricultural activities at Point Reyes. Planting artichokes or other row crops will attract birds. And introducing sheep, goats, pigs or chickens will attract native predators such as coyotes, bobcats, and foxes. Expanded ranching would only create new wildlife conflicts.

Cattle ranching should only be allowed if it's consistent with preserving the natural environment. And agricultural activities such as mowing shouldn't be allowed in park areas where they harm endangered species or wildlife habitat, impair water quality, cause excessive erosion or spread invasive plants/diseases.

Cattle are the seashore's primary source of greenhouse gases. So the Park Service's preferred alternative is inconsistent with its own "Climate Friendly Parks" plan.

#5965

Name: N/A, N/A

Correspondence: Please do not exterminate these elk to benefit cattle ranchers!

#5966

Name: N/A, N/A

Correspondence: Time for cattle ranchers to start looking at alternatives. Need to stop producing gassy bovines.

#5967

Name: Klinke, Sally

Correspondence: PLEASE protect wildlife at Point Reyes!!!

#5968

Name: Troup, Brenda

Correspondence: Your job is to protect the wild animals in refuges of all sorts, not to attack them for the benefit of commercial organizations like ranches. Leave the animals alone; their situation has been truncated severely already.

#5969

Name: Anderson, Judith

Correspondence: I am writing to urge the National Park Service to discontinue the grazing of beef and dairy cattle at Point Reyes National Seashore. This precious area has been damaged by livestock grazing which poses a threat to the environment and local wildlife and it should be protected and used to serve the public good, and not for the benefit of the livestock industry.

I strongly oppose Option B and any other proposal that would be fatal to Tule Elk or other wildlife to the benefit of ranching operations, and encourage the agency to adopt Option F to discontinue grazing and allow members of the public to enjoy this beautiful park and to be enriched with opportunities to visit and appreciate this special place.

#5970

Name: chalmers, arlene

Correspondence: n/a

#5971

Name: Fontaine, Cheryl

Correspondence: Killing elk for cattle? Wrong-headed, evil, destructive - HIGHLY - destructive for the environment. Animal agriculture is the second leading cause of climate change, loss of vital environment and species, filthy water, and complete eradication of rare species.

To destroy wildlife for cattle is so ignorantly WRONG I wonder who benefits besides cattlemen and how much are they shoving in various pockets to get their way? If this country, indeed the whole world does not turn to more plant-based diets the planet we live on will be utterly destroyed - already millions of acres of forest, jungle, plains has been wiped out for cattle grazing. The grain that could be used to feed PEOPLE is instead being used to feed cattle.....

People with intelligence, courage, love of country and planet must ensure that cattle and cattlemen are NOT EVER allowed to destroy more precious wildlife flora and fauna to assure a steady stream of dollars in their bank accounts. No human on earth requires MEAT of any kind for health... it's propaganda fed to us since this country

began. It is way past time to realize what we are doing to our planet and ourselves by this never-ending, ever-expanding breeding, grazing, destruction that cattle and other livestock bring to our lives. NO MORE!

Plus the fact, need I mention AGAIN, that i strongly protest the use of my tax dollars for the killing of wildlife in order for cattlemen to make huge profits of endangering our planet and our lives!

#5972

Name: Angell, JL

Correspondence: Point Reyes National Seashore is supposed to be managed under the Point Reyes Act for "maximum protection, restoration, and preservation of the natural environment." There's no mandate for prioritizing commercial agricultural leases on these public lands. Follow your mandate please- -the cows have to go if there is a conflict with wildlife if you are actually doing your job.

My needs are not met by viewing cows- -yet visits to the area are worth it for elk viewing.

#5973

Name: Tuomi, R.

Correspondence: Elk need more protection then cattle farmers who don't even own the land they are using. They are part of the natural eco system, sorry to say cows aren't.

#5974

Name: Anderholm, Jon

Correspondence: Yes... we only have 1 environment.... 1 biosphere....

#5975

Name: Klipfel II, George

Correspondence: Wildlife and natural scenery motivate me to visit Point Reyes and other national parks. • Point Reyes National Seashore is supposed to be managed under the Point Reyes Act for "maximum protection, restoration, and preservation of the natural environment." There's no mandate for prioritizing commercial agricultural leases on these public lands. • Natural values, native wildlife, public access and enjoyment should take priority over commercial activities at Point Reyes. • Tule elk are an important part of the landscape at Point Reyes. Their recovery is a result of successful native ecosystem restoration, which is a key element of the Park Service's mission. It's taken a lot of time, money and effort to restore tule elk to Point Reyes, the only national park where they live. Tule elk should be allowed to roam free and forage in the park - not shot, removed, fenced or treated as problem animals. • Right now the Point Reyes ranches enjoy not only subsidized grazing fees and housing, but also taxpayer-funded infrastructure and road improvements, and publicly funded projects. But commercial activities at Point Reyes should be required to accommodate native wildlife - not the other way around. • The Park Service shouldn't allow any new agricultural activities at Point Reyes. Planting artichokes or other row crops will attract birds. And introducing sheep, goats, pigs or chickens will attract native predators such as coyotes, bobcats and foxes. Expanded ranching would only create new wildlife conflicts. • Cattle ranching should only be allowed if it's consistent with preserving the natural environment. And agricultural activities such as mowing shouldn't be allowed in park areas where they harm endangered species or wildlife habitat, impair water quality, cause excessive erosion or spread invasive plants/diseases. • Cattle are the seashore's primary source of greenhouse gases. So the Park Service's preferred alternative is inconsistent with its own "Climate Friendly Parks" plan.

Thank you for your consideration.

#5976



Name: Bostock, Vic

Correspondence: I am writing to urge the National Park Service to discontinue the grazing of beef and dairy cattle at Point Reyes National Seashore. This precious area has been damaged by livestock grazing which poses a threat to the environment and local wildlife and it should be protected and used to serve the public good, and not for the benefit of the livestock industry.

I strongly oppose Option B and any other proposal that would be fatal to Tule Elk or other wildlife to the benefit of ranching operations, and encourage the agency to adopt Option F to discontinue grazing and allow members of the public to enjoy this beautiful park and to be enriched with opportunities to visit and appreciate this special place.

#5977

Name: N/A, N/A

Correspondence: it is your job to protect wildlife and the forest. you are not suppose to kill our wildlife for cattle. the yule elk that live in point reyes must stay there.they are part of the ecosystem in a positive way. the cattle are destructive and not wanted. we want elk not cattle. do your job stop taking money from cattle ranchers.

#5978

Name: Osgood, Karen and

Correspondence: I strongly oppose Option B and any other proposal that would be fatal to Tule Elk or other wildlife to the benefit of ranching operations, and encourage the agency to adopt Option F to discontinue grazing and allow members of the public to enjoy this beautiful park and to be enriched with opportunities to visit and appreciate this special place.

These are places of sanctuary for wildlife and people and they should be left in peace.

#5979

Name: Carlton, Alan

Correspondence: SIERRA CLUB COMMENT ON POINT REYES GENERAL MANAGEMENT PLAN EIS

## INTRODUCTION

Thank you for the opportunity to comment on the Draft Environmental Impact Statement (DEIS) for a General Management Plan Amendment (GMPA) for the management of areas of Point Reyes National Seashore (PRNS) and Golden Gate National Recreation Area (GGNRA) now managed for dairy farming and beef cattle ranching and full-time residential use. The Sierra Club's position is that all the ranching alternatives involve the impairment of natural resources and that three NPS laws prohibit actions that will impair natural resources. Consequently, the Park Service should prepare a supplemental DEIS with ranching alternatives that comply with applicable laws requiring the protection of natural resources and it should then circulate that supplemental DEIS for public comment.

## APPLICABLE LAWS

PRNS and GGNRA are units of the national park system and, as such, must be managed primarily to protect the natural resources of the parks. The three applicable laws in this regard are as follows:

The first is the 1916 NPS Organic Act which applies to all units of the national park system, including PRNS and GGNRA. The Organic Act provides as follows: § 100101 (a) In General- The Secretary . . . shall promote and regulate the use of the National Park System by means and measures that conform to the fundamental purpose of the System units, which purpose is to conserve the scenery, natural and historic objects, and wild life in the System

units and to provide for the enjoyment of the scenery, natural and historic objects, and wild life in such manner and by such means as will leave them unimpaired for the enjoyment of future generations.54 U.S.C. § 100101(a). (Emphasis added.) With respect to the Organic Act, the Ninth Circuit Court of Appeals has held (in a case in which the Sierra Club was an intervening defendant, alongside NPS) that the language quoted above means 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).

The other two laws are the PRNS and GGNRA statutes. The PRNS legislation provides, in pertinent part, as follows: § 459c-6. Administration of property(a) Protection, restoration, and preservation of natural environment Except as otherwise provided in sections 459c to 459c-7 . . . the property . . . shall be administered by the Secretary without impairment of its natural values, in a manner which provides for such recreational, educational, historic preservation, interpretation, and scientific research opportunities as are consistent with . . . the maximum protection, restoration, and preservation of the natural environment within the area . . . 16 U.S.C. § 459c-6. (Emphasis added.) The GGNRA legislation provides, in pertinent part, as follows: §460bb - Establishment In order to preserve for public use and enjoyment certain areas of Marin and San Francisco Counties, California, possessing outstanding natural, historic, scenic, and recreational values, and in order to provide for the maintenance of needed recreational open space necessary to urban environment and planning, the Golden Gate National Recreation Area (hereinafter referred to as the "recreation area") is hereby established. In the management of the recreation area, the Secretary ... shall utilize the resources in a manner which will provide for recreation and educational opportunities consistent with sound principles of land use planning and management. In carrying out the provisions of this subchapter, the Secretary shall preserve the recreation area, as far as possible, in its natural setting, and protect it from development and uses which would destroy the scenic beauty and natural character of the area.16 U.S.C. § 460bb.

#### RANCHING'S IMPACTS ON NATURAL RESOURCES REQUIRE A NEW SUPPLEMENTAL EIS

The DEIS makes it clear that continued cattle ranching as proposed in the current ranching alternatives will have detrimental environmental consequences on all natural resources, including soils, water quality, air quality, vegetation and wildlife (especially elk). Consequently, all the ranching alternatives violate the Park Service's duties under the three statutes and are therefore unlawful. Under these circumstances it makes no sense for the Park Service to go forward with a Final EIS. In view of the above, the Park Service needs to develop new ranching alternatives that do not violate the three laws quoted above and recirculate a supplemental DEIS for public comment. It should provide that all ranching operations that are permitted to operate in the PRNS and GGNRA should be modified so that going forward there are no negative impacts on the water quality and that range condition improves to good or excellent condition throughout the entire pastoral zone.

In the new alternatives, the Sierra Club opposes any diversification in the pasture subzone. There is no reason to allow hay, haylage and silage, and chickens, sheep and goats outside the ranch core. Such activities will have detrimental environmental consequences and have no purpose other than to increase ranch revenue. The Sierra Club also opposes continued leasing of any ranches if the current lessee or family does not renew the lease.

The new alternatives must identify the source of funds to fully implement the alternative and the effects of any reduction in funding on any other existing programs must be described. The FEIS should assume no increase in overall funding for PORE to pay for the implementation of the selected alternative, since PORE funding in real dollars has been declining for some years.

#5980

Name: Blumenthal, Harry

Correspondence: I am totally against this plan. Point Reyes has long been a favorite unique place along the California Coast. I love visiting there and seeing the Tule Elk as well as the unique geology and beaches. It is a settled town and place that cannot be give up to cattle that will totally change the land, the wetlands and the uniqueness of this beautiful coastal extremely iconic place for most Californians and visitors from all over the

world. The Coastal Commission should NEVER approve such a plan that would ruin such a uniquely beautiful part of California's Coastline. Please do not implement these most horrid changes to this Environmental treasure! I consider it part on my home!

Harry Blumenthal

#5981

Name: Brewer, Georgia

Correspondence: I'm a California resident and US taxpayer. I strongly object to the proposal to dedicate one third of Point Reyes National Seashore to cattle ranching and other commercial agricultural activities.

Our national parks are supposed to be for the enjoyment of us all, rather than for the commercial gain of a few.

The Point Reyes Seashore - which I have visited numerous times - is supposed to be managed under the Point Reyes Act for "maximum protection, restoration, and preservation of the natural environment."

Preserving our national natural heritage, including the flora and fauna of Point Reyes, is what I expect the Park Service to do with the tax dollars that Americans like me pay you! For example, Tule elk should be allowed to roam free and forage in the park - not be shot, removed, fenced or otherwise treated as problem animals.

Tule elk are not the problem - the problem is cattle! Not only are cattle ranching and other agricultural activities harmful to the natural environment - by impairing water quality, creating erosion, spreading disease, etc - they also create unnecessary wildlife conflicts. Commercial activities at Point Reyes should be required to accommodate native wildlife - not lead to the unfair and inhumane eradication of that wildlife!

I say we've done enough for the Point Reyes ranches by subsidizing their grazing fees and housing, and funding infrastructure and road improvements.

I ask you, NPS, to do your job and preserve Point Reyes for all of us, and for the generations to come.

#5982

Name: Carlton, Alan

Correspondence: COMMENT ON POINT REYES GENERAL MANAGEMENT PLAN EIS

The statutory purpose of National Parks, including Seashores, under the National Parks Organic Act is: "To conserve the scenery and the natural and historic objects and the wild life 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." In 1976, Congress amended Point Reyes' legislation to address resource management. "[E]xcept as otherwise provided" NPS shall administer Point Reyes 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, and based upon, and supportive of the maximum protection, restoration, and preservation of the natural environment within the area" (16 U.S.C. § 459c-6).

The EIS makes it clear that continued cattle ranching will have detrimental environmental consequences on soils, water quality, vegetation, and wildlife, including tule elk. The preferred Alternative B is not the alternative that would do the most to reduce those detrimental consequences and meet the statutory purposes required by statute to be "supportive of the maximum protection, restoration, and preservation of the natural environment within the area"

The most protection and the least detrimental consequences to the environment from continued ranching are a combination of Alternatives D and E Alternative E would eliminate dairy ranching, which has more detrimental

consequences than beef ranching. Alternative D would reduce the detrimental consequences by reducing the grazing acreage by 7500 acres, eliminating the detrimental consequences of grazing on those acres. Thus, the least detrimental environmental consequences would result from adopting Alternative E with a reduction of 7500 acres of grazing land. Note that the historical dairy ranches can be preserved without cattle.

The Management Activities and Mitigation Measures must provide that ranching operations should be managed using Best Management Practices to avoid harm to natural resources from overgrazing, severe trampling, erosion, topsoil loss, air pollution, and water contamination by nitrates, phosphates and pathogens found in animal urine and feces. Grazing should be rotated periodically to allow rest and restoration of leased lands. All ranching activities should be managed in a way that minimizes impacts and improves and restores the native habitat values of the Seashore's grasslands and coastal prairies. There must be rigorous enforcement of all management regulations. Leases should be short term and not renewed if Best Management Practices have been violated.

There should be no diversification in the pasture subzone. There is no reason to allow hay, haylage and silage, and chickens, sheep and goats outside the ranch core. Such activities will have detrimental environmental consequences and have no purpose other than to increase ranch revenue. Nor should there be continued leasing of any ranches if the current lessee or family does not renew the lease.

#5983

Name: N/A, N/A

Correspondence: I am writing to urge the National Park Service to discontinue the grazing of beef and dairy cattle at Point Reyes National Seashore. This precious area has been damaged by livestock grazing which poses a threat to the environment and local wildlife and it should be protected and used to serve the public good, and not for the benefit of the livestock industry.

I strongly oppose Option B and any other proposal that would be fatal to Tule Elk or other wildlife to the benefit of ranching operations, and encourage the agency to adopt Option F to discontinue grazing and allow members of the public to enjoy this beautiful park and to be enriched with opportunities to visit and appreciate this special place.

#5984

Name: N/A, N/A

Correspondence: Seriously?? Putting cattle over native wildlife? Just think about that. You are the National Park Service. You protect lands that are refugia for wildlife. Recall NPS's mission statement. Yet, you are catering to the ranching industry. Have a freakin' backbone and stand up for what is right. Just a reminder that you all are supposed to protect fragile wildlife populations and not have people shoot down elk. Cattle are in the way of the park, not the other way around. Ranchers destroy the land and you're about to give them the green light to kill elk for their gain. Completely despicable. You have a chance to make a different decision and support Tule Elk. The public want them alive not dead. Ranchers and their livestock do not do anything to support the ecosystem, they make it worse. Elk do a far better job than cattle.

#5985

Name: N/A, N/A

Correspondence: I am writing to urge the National Park Service to discontinue the grazing of beef and dairy cattle at Point Reyes National Seashore. This precious area has been damaged by livestock grazing which poses a threat to the environment and local wildlife and it should be protected and used to serve the public good, and not for the benefit of the livestock industry.

I strongly oppose Option B and any other proposal that would be fatal to Tule Elk or other wildlife to the benefit of ranching operations, and encourage the agency to adopt Option F to discontinue grazing and allow members of

the public to enjoy this beautiful park and to be enriched with opportunities to visit and appreciate this special place.

#5986

Name: Huddleston, Molly

Correspondence: Please stop choosing the cattle over the natural wildlife in the area. This erodes the land and makes it hard for all living creatures to co-exist there.

#5987

Name: N/A, N/A

Correspondence: I am writing to urge the National Park Service to discontinue the grazing of beef and dairy cattle at Point Reyes National Seashore. This precious area has been damaged by livestock grazing which poses a threat to the environment and local wildlife and it should be protected and used to serve the public good, and not for the benefit of the livestock industry.

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#5988

Name: Blackwell-Marchant, Pat

Correspondence: We can oversee the demands of balancing wildlife and domestic land resources without relocating or killing elk in the process. Let's find the happy medium.

#5989

Name: zamit, norma

Correspondence:

I urge the National Park Service to discontinue the grazing of beef and dairy cattle at Point Reyes National Seashore.

Livestock grazing poses a threat to the environment and local wildlife. It is not the livestock's fault it simply is what happens to the environment. The Point Reyes area should be protected and used to serve the public good, and not for the benefit of the livestock industry.

I strongly oppose Option B and any other proposal that would be fatal to Tule Elk or other wildlife to the benefit of ranching. I encourage the agency to adopt Option F to discontinue grazing and allow members of the public to enjoy this beautiful park and to be enriched with opportunities to visit and appreciate this special place. Nature heals please protect it.

#5990

Name: Confectioner, Vira

Correspondence: I am writing to urge the National Park Service to discontinue the grazing of beef and dairy cattle at Point Reyes National Seashore. This precious area has been damaged by livestock grazing which poses a threat

to the environment and local wildlife and it should be protected and used to serve the public good, and not for the benefit of the livestock industry.

I strongly oppose Option B and any other proposal that would be fatal to Tule Elk or other wildlife to the benefit of ranching operations, and encourage the agency to adopt Option F to discontinue grazing and allow members of the public to enjoy this beautiful park and to be enriched with opportunities to visit and appreciate this special place.

#5991

Name: Edison, Miranda

Correspondence: Please take a stand for wildlife and support tulle Elk. These are creatures not meant for culling but to live in a harmony with an ecosystem that was once all theirs. On a day when people are protesting climate change, I believe it is more vital to support wild animals which contribute less to it than do cattle. How wonderful is it to see these subspecies? It reminds us in a larger way of who we are and what we need to do. Please save the tulle Elk.

#5992

Name: Hartung, Bridgette

Correspondence: I urge you to adopt Alternative F, which would discontinue farming and ranching opportunities in the park and expand visitor opportunities. The preservation of native wild species must take precedence over farming and ranching activities. Grazing negatively affects ecosystems, causing water pollution and soil erosion, spreading invasive species and disease, and harming endangered species.

#5993

Name: Bruce, Patrik

Correspondence: I'm writing to support the public access and bicycling improvements outlined under Alternatives B, C, D, E, and F. I strongly support proposals that would lead to the planning and implementation of bicycling routes on trails, ranch roads, and pathways throughout the planning area, including but not limited to: 1) a connection between Devil's Gulch and Platform Bridge Road using existing ranch roads, 2) a connection between Bolinas Ridge Trail at Olema Hill and Point Reyes Station to serve as an interim connection for the Cross Marin Trail, 3) a connection between Bolinas Ridge Trail and Five Brooks Stables using existing ranch roads 4) a connection between Drakes Estero and Abbotts Lagoon Trail using existing ranch roads, 5) a connection between Marshall Beach Trailhead and Pierce Point Road using existing ranch roads, and 6) an Estero Trail loop using existing ranch roads. I encourage NPS to collaborate with ranchers and other stakeholders to educate the public and address concerns related to public access on working ranch lands.

The improvements outlined above would enable and encourage me to visit the Seashore more regularly-and by bike, rather than car. I would feel much safer riding in the Seashore and surrounding areas on trails, pathways, and ranch roads, rather than on roads shared with fast-moving vehicular traffic. Bicycling opportunities are currently very limited and fragmented, so any improvements in connectivity and the creation of new loop options would enable me to enjoy more of the Seashore and surrounding areas by bike.

#5994

Name: Butler, Susan

Correspondence: Dear parks planning,I respectfully ask that you reconsider your plan to allow more grazing in the Pt Reyes area. at a time of extreme climate risk we do not need more cattle and less wildlife. wild species need more protected space. not less. don't make this decision from your desk go for a walk in nature and think about it and how your actions play into the bigger picture of our coast and our planet. regards, Susan Butler

#5995

Name: Bush, Sakina

Correspondence: Point Reyes National Park belongs to all of us. I value the few remaining wild and scenic places left in California and am writing to urge you to protect Point Reyes private business interests that would try to limit the protection, restoration, and preservation of this park. As a valuable part of our public heritage, wildlife and public access should take priority over commercial leases. I understand the value of agriculture, but it should not have undue influence in Point Reyes.

The recovery of Tule Elk is essential to native ecosystem restoration in Point Reyes which is an important to the Park's Service's mission. Tule Elk should not be shot, removed, or fenced. It is infuriating to me that private business people, ranchers, are subsidized. Our tax dollars should be funding the protection and restoration of our threatened ecologies, not promoting their demise.

#5996

Name: Tataranowicz, Thomas

Correspondence: Do not allow this senseless move.

#5997

Name: Penfield, Ralph

Correspondence: Its terrible that the NPS is putting the wants of commercial interests ahead of your mandate to protect and preserve the parks of our country. As a taxpayer I already resent the fact that I have to subsidize private businesses. Add the fact that apparently your going to kill elk on top of that. You are certainly not doing the job the American people expect of you.

#5998

Name: Sailer, Randy

Correspondence: i am very much against allowing commercial activities on point reyes national seashore. Their is no mandate for allowing commercial agriculture leases on public lands. the tule elk restoration is a successful program and is the only place these elk live. this is consistent with the point reyes act which calls for native ecosystem restoration. the american public wants their public lands managed based on sound science and public input, the owners, not politics. allowing cattle, sheep, etc. on this seashore will only cause conflict and big problems. our national parks, wildlife areas, public lands bring in millions/billions of dollars each year and pay for themselves. cattle grazing is a losing proposition and the taxpayers are losing millions of dollars each year to such programs. smart business people would have gotten out of cattle grazing a long time ago. grazing cattle, sheep etc. also raise hell on the ecosystems and destroy trees, and water sources. there are many examples throughout our public lands system where this is true. thank you

#5999

Name: Ridgway, Kathi

Correspondence: Protect the deer. Not cattle.

#6000

Name: Chismar, Nancy

Correspondence: Tule elk are an important part of the landscape at Point Reyes. Their recovery is a result of successful native ecosystem restoration, which is a key element of the Park Service's mission. It's taken a lot of time, money and effort to restore tule elk to Point Reyes, the only national park where they live. Tule elk should be allowed to roam free and forage in the park - not shot, removed, fenced or treated as problem animals.

The Park Service shouldn't allow any new agricultural activities at Point Reyes. Planting artichokes or other row crops will attract birds. And introducing sheep, goats, pigs or chickens will attract native predators such as coyotes, bobcats and foxes. Expanded ranching would only create new wildlife conflicts.

#6001

Name: Pritchett, Susan

Correspondence: Leave the elk where they are! Why do we always have to destroy one animal to accommodate ranching (i.e., wild horses, elk).

#6002

Name: N/A, N/A

Correspondence: I am writing to urge the National Park Service to discontinue the grazing of beef and dairy cattle at Point Reyes National Seashore. This precious area has been damaged by livestock grazing which poses a threat to the environment and local wildlife and it should be protected and used to serve the public good, and not for the benefit of the livestock industry.

I strongly oppose Option B and any other proposal that would be fatal to Tule Elk or other wildlife to the benefit of ranching operations, and encourage the agency to adopt Option F to discontinue grazing and allow members of the public to enjoy this beautiful park and to be enriched with opportunities to visit and appreciate this special place.

#6003

Name: Zeigfinger, Donna

Correspondence: I am writing to urge the National Park Service to discontinue the grazing of beef and dairy cattle at Point Reyes National Seashore. This precious area has been damaged by livestock grazing which poses a threat to the environment and local wildlife and it should be protected and used to serve the public good, and not for the benefit of the livestock industry.

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#6004

Name: peiris, ravi

Correspondence: I am writing to urge the National Park Service to discontinue the grazing of beef and dairy cattle at Point Reyes National Seashore. This precious area has been damaged by livestock grazing which poses a threat to the environment and local wildlife and it should be protected and used to serve the public good, and not for the benefit of the livestock industry.

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#6005

Name: Robson, Catherine

Correspondence: I am writing to urge the National Park Service to discontinue the grazing of beef and dairy cattle



at Point Reyes National Seashore. This precious area has been damaged by livestock grazing which poses a threat to the environment and local wildlife and it should be protected and used to serve the public good, and not for the benefit of the livestock industry.

I strongly oppose Option B and any other proposal that would be fatal to Tule Elk or other wildlife to the benefit of ranching operations, and encourage the agency to adopt Option F to discontinue grazing and allow members of the public to enjoy this beautiful park and to be enriched with opportunities to visit and appreciate this special place.

We're fighting for the future of the planet and animal agriculture is bringing us closer to its demise.

#6006

Name: Lundstrom, Robert

Correspondence: It is unclear to me as to why the NPS in the Point Reyes National Seashore appears to want to expand ranch and dairy activity through diversification within the park boundaries. For purposes of my comments when I refer to the park and NPS I mean Point Reyes National Seashore. As a local and frequent user of the park I have the following comments and questions: " Effect of cow waste on the water quality within the park affecting all native species, including seal pupping throughout the park. What studies show that effects and what are they? " Water quality in the park has tested very low in the past. What is the parks plan for improving water quality in the park and how ranches/dairies could possibly mitigate negative impact of cows on water quality? Has there been recent testing, what are the numbers, and how do they compare to past tests. " What is the effect of poor water quality on existing flora and fauna. Has it been studied? " The causal relationship of cow waste on the Johnes disease within the park: current infection rate in existing cow population and relationship to manure spreading in forage within the park. Has it been studied? " The practice of spreading cow manure slurry within the park and the effects of said activity on water quality, native flora and fauna, and the potential spreading of Johnes disease. Has it been studied? " What are the long term effects of bovine herds on erosion within the park? Has it been studied? " The lack of study of ranch/dairy operations on conflict with wild species other than elk. For example: What about the killing of native animals (nesting birds, juvenile mammals) when mechanically harvesting planted forage? How many animals have been killed during harvest? Has it been monitored and/or studied? " In discussions with park staff I was disappointed to hear that there has not been a program to monitor and hold responsible, with penalties, ranch/dairy conflicts with all wild species. " It has been reported that 112 native species compete with cows for forage. What are the negative effects on the native species of ranch/dairy? " With global warming affecting already unreliable rainfall in Northern California, how is it possible that the land can support ranches/dairies and native species? " A clear explanation of how ranch/dairy operations have become cultural as a mitigating factor while the oyster farm was not. It seems to me that the number of ranch/dairy operations in the area outside the park show that the ranch/dairy culture is secure in West Marin. " With park staff having been cut, how will the park monitor the expansion of permitted ranch/dairy operations and their effect on the flora and fauna in the park? Just trusting the ranch/dairy operation to comply is unacceptable. " If the operation of ranches/dairies is continued, what is the market rate for ranchland and how does the park determine fees to ranch/dairy operations. No discounts seem appropriate as the operators have been paid for the land. " Why has the NPS allowed existing ranches/dairies to take over land abandoned by family stakeholders instead of returning said lands to the public and native species? What benefits to the public or native species has this practice provided? " What benefit to the park and visitors would voiding the legislated requirement of ranch/dairy operators be kept in specific families. Should ranch/dairy leasing continue, there should be no open transfer of leases. " Why would it be beneficial to the public and native species to allow the planting of row crops within designated areas. What studies have been done on potential effects of said activities? Question of potential introduction of non-native flora. Would farm stands be allowed? " Within the published surveys done by the park I find no evidence that the continued existence of ranches/dairies is a priority to visitors to the park. " The surveys reveal that the greatest interest and desires of visitors is the preserved wildland and sanctuary for endangered Tule Elk. Why isnt that the main focus of the park? 41% of land in America is dedicated to cows; either their grazing or the raising of their food. What is the need to keep them in the park when so much of the country is already dedicated for cows. I think it is time for ranches/dairies within the park to end. Keep Point Reyes National

Seashore as wild as possible and protect the endangered Tule Elk. The land has been paid for and the need for ranches/dairies does not fill a cultural need significant enough that it requires the killing of Tule Elk as well as the negative impacts on the land and other wildlife in the park. The ranches/dairies should be gone within the proposed 5 year period without chance to rezone as implied (I believe to be Alternative F).

#6007

Name: N/A, N/A

Correspondence: I am writing in support of the free-roaming Tule elk herds at Point Reyes National Seashore. They don't have the ability to defend themselves against human insanity but I sure do. My voice is their voice and I'm using it to object to any fencing, removal, sterilization or killing of elk in the park.

The Tule elk recovery process has been a success story and putting an end to this story is a truly sickening display of how much some people care nothing for the natural world. Public lands by definition should be "open to all persons."

I am fully aware that cattle ranching and farming are needed to feed the community but that doesn't mean these operations get to dictate how PUBLIC lands are used. There are ways for commercial operations and wildlife to exist peacefully, it takes some ingenuity and serious conversations which I know for some people can be a daunting task but it needs to be figured out. I would like to know why Rep. Jared Huffman (D-Calif.) teamed up with Rob Bishop (R-Utah) to make an end run around an ongoing public-planning process. I don't think it's right on any level that congressional representatives are being given a say over a local issue when local voices are being ignored.

The mission of the National Park Service, as listed on your own site, is as follows: "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." I wanted to remind you of that as it seems like the new directive of the NPS is very much going against its own purpose for being. Prioritizing the protection of natural areas should be first and foremost, not an afterthought.

I don't know if you've ever been to Point Reyes so I'm going to tell you about a very powerful experience I had while hiking there one foggy morning. My boyfriend and I headed out on the Tomales Point Trail that morning and could barely see the trail ahead of us never mind off to the sides where we heard the Tule elk calling out to each other. Their bugling is eerie under normal circumstances and even more so when you can't see them through the fog. Upon hearing the sound we both stopped to appreciate the moment we were given. We continued on and out of the fog we started to see a dark shape materialize out of nowhere. A couple of the elk were making their way down the hill and across the trail to the other side to graze. The elk were just as surprised to see us as we were to see them as the fog hindered all visibility. Not wanting to scare the elk we stayed back to respect their space and waited until they passed to the other side. Before completely clearing the trail one of them spotted us, saw that we weren't a threat, and continued grazing. To be acknowledged in such a way by a majestic creature is an experience like no other. To honor that special moment I got a tattoo of a stag with magnificent antlers that provides me with a daily reminder that nature is both strong and fragile.

The lands that are designated as National Parks are treasures not to be squandered to the highest bidder. I urge you to remind yourself of the NPS mission and the real reason for your existence. I feel blessed to be able to access such natural beauty and can relate to Theodore Roosevelt when he said, "There are no words that can tell the hidden spirit of the wilderness, that can reveal its mystery, its melancholy, and its charm."

#6008

Name: Ketelsen, Deborah  
Correspondence: Dear NPS,

It has come to my attention that the NPS has placed a larger value on Cattle rather than Tule Elk which have been part of Pt. Reyes National Seashore for decades. The Tule Elk populations have dwindled since the 1800's due to hunting and cattle ranching and now you basically want to exterminate them. That is what will happen if the NPS continues to allow the killing of Tule Elk if they "happen" to wander onto cattle grazing lands.

I love the outdoors, nature and everything she provides, and it puzzles me that NPS would allow such a thing. Seriously? Cattle over ELk? How many people benefit off the Cattle? A few lucky ranchers that get to graze their cattle on Public Lands. If you surveyed all the taxpayers in CA, you really think we would agree to this behavior?

Please take some serious time to re-think your archaic philosophy. I believe it goes against everything the Nation Park Service stands for. It's time to make a change.

Deborah Ketelsen

#6009

Name: Muradian, Becky

Correspondence: I strongly oppose Option B and any other proposal that would be fatal to Tule Elk or other wildlife to the benefit of ranching operations, and encourage the agency to adopt Option F to discontinue grazing and allow members of the public to enjoy this beautiful park and to be enriched with opportunities to visit and appreciate this special place.

#6010

Name: N/A, N/A

Correspondence: I am writing to urge the National Park Service to discontinue the grazing of beef and dairy cattle at Point Reyes National Seashore. This precious area has been damaged by livestock grazing which poses a threat to the environment and local wildlife and it should be protected and used to serve the public good, and not for the benefit of the livestock industry.

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#6011

Name: Zawkiewicz, Bobbie

Correspondence: I am writing to urge the National Park Service to discontinue the grazing of beef and dairy cattle at Point Reyes National Seashore. This precious area has been damaged by livestock grazing which poses a threat to the environment and local wildlife and it should be protected and used to serve the public good, and not for the benefit of the livestock industry.

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#6012

Name: Mulato, Jill

Correspondence: I am writing to urge the National Park Service to discontinue the grazing of beef and dairy cattle at Point Reyes National Seashore. This precious area has been damaged by livestock grazing which poses a threat to the environment and local wildlife and it should be protected and used to serve the public good, and not for the benefit of the livestock industry.

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#6013

Name: Anacker, Celeste

Correspondence: Discuss how wildlife and natural scenery motivate you to visit Point Reyes and other national parks. Point Reyes National Seashore is supposed to be managed under the Point Reyes Act for "maximum protection, restoration, and preservation of the natural environment." There's no mandate for prioritizing commercial agricultural leases on these public lands. Natural values, native wildlife, public access and enjoyment should take priority over commercial activities at Point Reyes. Tule elk are an important part of the landscape at Point Reyes. Their recovery is a result of successful native ecosystem restoration, which is a key element of the Park Service's mission. It's taken a lot of time, money and effort to restore tule elk to Point Reyes, the only national park where they live. Tule elk should be allowed to roam free and forage in the park - not shot, removed, fenced or treated as problem animals. Right now the Point Reyes ranches enjoy not only subsidized grazing fees and housing, but also taxpayer-funded infrastructure and road improvements, and publicly funded projects. But commercial activities at Point Reyes should be required to accommodate native wildlife - not the other way around. The Park Service shouldn't allow any new agricultural activities at Point Reyes. Planting artichokes or other row crops will attract birds. And introducing sheep, goats, pigs or chickens will attract native predators such as coyotes, bobcats and foxes. Expanded ranching would only create new wildlife conflicts. Cattle ranching should only be allowed if it's consistent with preserving the natural environment. And agricultural activities such as mowing shouldn't be allowed in park areas where they harm endangered species or wildlife habitat, impair water quality, cause excessive erosion or spread invasive plants/diseases. Cattle are the seashore's primary source of greenhouse gases. So the Park Service's preferred alternative is inconsistent with its own "Climate Friendly Parks" plan.

#6014

Name: Collins, Carol

Correspondence: Wildlife and natural scenery motivate me to visit Point Reyes and other national parks. Point Reyes National Seashore is supposed to be managed under the Point Reyes Act for "maximum protection, restoration, and preservation of the natural environment." There's no mandate for prioritizing commercial agricultural leases on these public lands. Natural values, native wildlife, public access and enjoyment should take priority over commercial activities at Point Reyes. Tule elk are an important part of the landscape at Point Reyes. Their recovery is a result of successful native ecosystem restoration, which is a key element of the Park Service's mission. It's taken a lot of time, money and effort to restore tule elk to Point Reyes, the only national park where they live. Tule elk should be allowed to roam free and forage in the park - not shot, removed, fenced or treated as problem animals. Right now the Point Reyes ranches enjoy not only subsidized grazing fees and housing, but also taxpayer-funded infrastructure and road improvements, and publicly funded projects. But commercial activities at Point Reyes should be required to accommodate native wildlife - not the other way around. The Park Service shouldn't allow any new agricultural activities at Point Reyes. Planting artichokes or other row crops will attract birds. And introducing sheep, goats, pigs or chickens will attract native predators such as coyotes, bobcats and foxes. Expanded ranching would only create new wildlife conflicts. Cattle ranching should only be allowed if it's consistent with preserving the natural environment. And agricultural activities such as mowing shouldn't be allowed in park areas where they harm endangered species or wildlife habitat, impair water quality, cause

excessive erosion or spread invasive plants/diseases. Cattle are the seashore's primary source of greenhouse gases. So the Park Service's preferred alternative is inconsistent with its own "Climate Friendly Parks" plan.

#6015

Name: Bohl, Thomas

Correspondence: I am opposed to plans to expand cattle ranching or any other commercial agriculture into Point Reyes National Seashore and Golden Gate National Recreation Area. Cattle ranching is destructive to the environment, and the Park Service should preserve these natural habitats for wild animals and future generations, not allow them to be destroyed for ranchers' greed.

#6016

Name: Murch, Annette

Correspondence: I am writing to urge the National Park Service to discontinue the grazing of beef and dairy cattle at Point Reyes National Seashore. This precious area has been damaged by livestock grazing which poses a threat to the environment and local wildlife and it should be protected and used to serve the public good, and not for the benefit of the livestock industry.

I strongly oppose Option B and any other proposal that would be fatal to Tule Elk or other wildlife to the benefit of ranching operations, and encourage the agency to adopt Option F to discontinue grazing and allow members of the public to enjoy this beautiful park and to be enriched with opportunities to visit and appreciate this special place.

#6017

Name: Aguirre , Gloria

Correspondence: Dear NPS

I am writing to urge the National Park Service to discontinue the grazing of beef and dairy cattle at Point Reyes National Seashore. This precious area has been damaged by livestock grazing which poses a threat to the environment and local wildlife and it should be protected and used to serve the public good, and not for the benefit of the livestock industry.

I strongly oppose Option B and any other proposal that would be fatal to Tule Elk or other wildlife to the benefit of ranching operations, and encourage the agency to adopt Option F to discontinue grazing and allow members of the public to enjoy this beautiful park and to be enriched with opportunities to visit and appreciate this special place.

#6018

Name: Trost, Kimberly

Correspondence: To Whom It May Concern: I care about protecting California's wildlife. I oppose the National Park Service's plan to kill native tule elk and expand commercial agriculture in Point Reyes National Seashore and Golden Gate National Recreation Area. I urge the National Park Service to instead restore the lands for wild animal habitat.

We should prioritize the preservation of our public lands and wildlife, not the economic interests of private ranchers. These commercial cattle ranches have serious negative environmental impacts on the park - polluting waterways, causing soil erosion, and harming the many endangered and threatened animals who live on Point Reyes. National parks exist to protect our natural resources and native wildlife. This park should be managed accordingly.

Thank you.

#6019

Name: Stein, Alvin

Correspondence: Stop the proposal to kill wildlife at point Reyes or myself and others will start a campaign to reduce tax dollars to your agency. This is immoral, unnecessary and costly to most citizens who are aware of the situation. Besides, ranchers are failing to protect their own livelihoods and want we recreational folks to support them. Wrong on all fronts. Thanks for your consideration.

#6020

Name: Spisak, D J

Correspondence: Do not kill the wild animals who are still living. Move the ranchers and cows out of the wild areas. This is public land, not to be exploited for the profit of a few.

#6021

Name: Parsons, Susan

Correspondence: Do not allow any hunting of Tule Elk at this time.

Thank you, Susan Parsons

#6022

Name: Raw, Wendi

Correspondence: I am writing as a Californian who loves our parks and their role in public life. I support allowing the natural wild plants and animals live their natural lives for the enjoyment of all of us. I visit the parks to have this experience. I urge the National Park Service to discontinue the grazing of beef and dairy cattle at Point Reyes National Seashore. This precious area has been damaged by livestock grazing which poses a threat to the environment and local wildlife and it should be protected and used to serve the public good, and not for the benefit of the livestock industry.

I strongly oppose Option B and any other proposal that would be fatal to Tule Elk or other wildlife to the benefit of ranching operations, and encourage the agency to adopt Option F to discontinue grazing and allow members of the public to enjoy this beautiful park and to be enriched with opportunities to visit and appreciate this special place.

#6023

Name: Smith, Judith

Correspondence: I am writing to urge the National Park Service to discontinue the grazing of beef and dairy cattle at Point Reyes National Seashore. This precious area has been damaged by livestock grazing which poses a threat to the environment and local wildlife and it should be protected and used to serve the public good, and not for the benefit of the livestock industry.

I strongly oppose Option B and any other proposal that would be fatal to Tule Elk or other wildlife to the benefit of ranching operations, and encourage the agency to adopt Option F to discontinue grazing and allow members of the public to enjoy this beautiful park and to be enriched with opportunities to visit and appreciate this special place.

#6024

Name: N/A, N/A

Correspondence: Instead of constantly trying to steal land from native wildlife, why aren't we doing something to limit the unsustainable growth of human population?! The Earth is not infinitely large, and if we don't intelligently manage our own population Nature will do it for us by means of catastrophic ecological collapse!

#6025

Name: graham, barbara

Correspondence: Now is not the time. More people are replacing milk with alternatives. And most people would rather see elk than dairy cows.

#6026

Name: Burger, Bruce

Correspondence: Methane emissions, and environmental degradation from cattle....must be considered in a time of Climate Emergency.

Point Reyes National Seashore is supposed to be managed under the Point Reyes Act for "maximum protection, restoration, and preservation of the natural environment." There's no mandate for prioritizing commercial agricultural leases on these public lands.

Natural values, native wildlife, public access and enjoyment should take priority over commercial activities at Point Reyes.

The Park Service shouldn't allow any new agricultural activities at Point Reyes. Planting artichokes or other row crops will attract birds. And introducing sheep, goats, pigs or chickens will attract native predators such as coyotes, bobcats and foxes. Expanded ranching would only create new wildlife conflicts.

Cattle are the seashore's primary source of greenhouse gases. So the Park Service's preferred alternative is inconsistent with its own "Climate Friendly Parks" plan.

#6027

Name: Hiestand, Nancy

Correspondence: Last weekend I observed many Tule elk in Point in Point Reyes National Seashore as I hiked to Tomales Point. I was alarmed to learn today that the General Management Plan is proposing to dedicate one third of the national seashore to cattle ranching. Even more alarming is the plan to kill elk that are in that designated area. These are majestic animals whose population is already low. The Point Reyes Act calls for maximum protection and restoration of the natural environment. Making cattle ranching a priority does not fit with this mandate of protection.

I strongly support preservation of the natural ecosystem and the plants and animals that thrive there. Public access and enjoyment are also more important than commercial leases. The effort to aid the recovery of Tule elk by restoring the native ecosystem has so far been successful. Moving forward, the elk must be allowed to roam free, not fenced or shot. If there must be commercial enterprises, they must accommodate native wildlife.

I ask that the Park Service disallow any new agricultural activities at Point Reyes. Planting row crops will attract birds. Introducing additional domesticated farm animals will attract native predators such as coyotes, bobcats and foxes. More ranching would create new wildlife conflicts.

If cattle ranching should be allowed, it must be consistent with preserving the natural environment. Mowing shouldn't be allowed in park areas where it could harm endangered species or wildlife habitat, impair water quality, cause excessive erosion or spread invasive plants/diseases.

Please keep in mind the mission of the National Park Service.

#6028

Name: Michael, Shelby

Correspondence: I am writing to urge the National Park Service to discontinue the grazing of beef and dairy cattle at Point Reyes National Seashore. This precious area has been damaged by livestock grazing which poses a threat to the environment and local wildlife and it should be protected and used to serve the public good, and not for the benefit of the livestock industry.

I strongly oppose Option B and any other proposal that would be fatal to Tule Elk or other wildlife to the benefit of ranching operations, and encourage the agency to adopt Option F to discontinue grazing and allow members of the public to enjoy this beautiful park and to be enriched with opportunities to visit and appreciate this special place.

#6029

Name: Cummings, Susanna

Correspondence: Wild animals should always come before cattle in our parks. People do not visit parks to see cattle operations. This is so short sighted to favor cattle ranchers over the elk. I would like to see the cattle operations removed from the park entirely.

#6030

Name: Walton, John

Correspondence: As a frequent visitor to this park I encourage you to re-prioritize the National Park services mission to manage Point Reyes under the Point Reyes Act for "maximum protection, restoration, and preservation of the natural environment."

Tule elk are an important part of the landscape at Point Reyes. Their recovery is a result of successful native ecosystem restoration, which is a key element of the Park Service's mission. It's taken a lot of time, money and effort to restore tule elk to Point Reyes, the only national park where they live. Tule elk should be allowed to roam free and forage in the park - not shot, removed, fenced or treated as problem animals.

The impact from cattle ranching leads to soil erosion, water pollution, invasive plants, declines in fish and bird populations, conflicts with wildlife, and even more greenhouse gas emissions. Given our current climate crisis we should be doing EVERYTHING we can to decrease greenhouse gas.

Placing the financial interests of the ranchers above those of the public and the planet is simply wrong-headed and reckless. Please reconsider your plan and priorities.

Regards,

John Walton

#6031

Name: Massey, Gregory

Correspondence: Please refrain from killing any animals, especially the native elk. The cattle industry is not only exploitive, but is also the most destructive industry on the planet.

#6032



Name: Chirpin, Robert

Correspondence: "BE GOOD STEWARDS OF THE EARTH!"...CREATOR PROTECTING THE NATURAL WORLD FROM UNNECESSARY ASSAULTS ON IT'S ORDER IS A MUST IF WE ARE TO SURVIVE THE FUTURE!

PLEASE WAKE-UP AND USE YOUR POWER TO PROTECT NATURE AND NOTHING MORE!

THE TIME IS NOW!

#6033

Name: REMIEN, SUZANNE

Correspondence: We are at a point where the climate crisis is a top priority and should be particularly so for a federal agency like the National Park Service that is widely relied upon to maintain healthy environments and natural resources. Regrettably, the priority of the National Park Service appears to be profit over the protection of the Tule elk, and therefore other wildlife populations as part of the cascading effect of using lethal means to decrease the already small number of Tule elk we have left.

These Tule Elk are a National treasure, not unlike the Sea Lions at Fisherman's Wharf in San Francisco, these mammals should be celebrated rather than destroyed.

As wardens of our National Parks, please commit to protecting our parks' assets of which Tule Elk are part of our National Parks' assets.

#6034

Name: Hochendoner, Bernard

Correspondence: leave the elk as they are.

#6035

Name: Carder, Tiffany

Correspondence: I am writing to urge the National Park Service to discontinue the grazing of beef and dairy cattle at Point Reyes National Seashore. This precious area has been damaged by livestock grazing which poses a threat to the environment and local wildlife and it should be protected and used to serve the public good, and not for the benefit of the livestock industry.

I strongly oppose Option B and any other proposal that would be fatal to Tule Elk or other wildlife to the benefit of ranching operations, and encourage the agency to adopt Option F to discontinue grazing and allow members of the public to enjoy this beautiful park and to be enriched with opportunities to visit and appreciate this special place.

#6036

Name: Swift, Allen

Correspondence: Grow a spine and stand up to the cattle people. Next you'll allow them to burn the forests to make for more grazing land like they're doing in the Amazon. All to provide more beef for Burger King and McDonalds etc. I grew up on a cattle ranch.

#6037

Name: N/A, N/A

Correspondence: Point Reyes National Seashore is supposed to be managed under the Point Reyes Act for

"maximum protection, restoration, and preservation of the natural environment." There's no mandate for prioritizing commercial agricultural leases on these public lands. Natural values, native wildlife, public access and enjoyment should take priority over commercial activities at Point Reyes. Tule elk are an important part of the landscape at Point Reyes. Their recovery is a result of successful native ecosystem restoration, which is a key element of the Park Service's mission. It's taken a lot of time, money and effort to restore tule elk to Point Reyes, the only national park where they live. Tule elk should be allowed to roam free and forage in the park - not shot, removed, fenced or treated as problem animals. Right now the Point Reyes ranches enjoy not only subsidized grazing fees and housing, but also taxpayer-funded infrastructure and road improvements, and publicly funded projects. But commercial activities at Point Reyes should be required to accommodate native wildlife - not the other way around. The Park Service shouldn't allow any new agricultural activities at Point Reyes. Planting artichokes or other row crops will attract birds. And introducing sheep, goats, pigs or chickens will attract native predators such as coyotes, bobcats and foxes. Expanded ranching would only create new wildlife conflicts. Cattle ranching should only be allowed if it's consistent with preserving the natural environment. And agricultural activities such as mowing shouldn't be allowed in park areas where they harm endangered species or wildlife habitat, impair water quality, cause excessive erosion or spread invasive plants/diseases. Cattle are the seashore's primary source of greenhouse gases. So the Park Service's preferred alternative is inconsistent with its own "Climate Friendly Parks" plan.

#6038

Name: Holy, Dominique

Correspondence: I urge you to protect the Tule Elk in Point Reyes National Seashore park. National parks should be a refuge for wildlife and preserve the natural environment. It is shocking to hear that the elk might be killed just so that a few ranchers can profit from free grazing for their cattle! This is unacceptable! It took very long to restore the elk population, and the Tule Elk only live in this area. Commercial activities at Point Reyes should be required to accommodate native wildlife - not the other way around! Thank you for your consideration.

#6039

Name: Girvin, Darrylin

Correspondence: I am writing to urge the National Park Service to discontinue the grazing of beef and dairy cattle at Point Reyes National Seashore. This precious area has been damaged by livestock grazing which poses a threat to the environment and local wildlife and it should be protected and used to serve the public good, and not for the benefit of the livestock industry.

I strongly oppose Option B and any other proposal that would be fatal to Tule Elk or other wildlife to the benefit of ranching operations, and encourage the agency to adopt Option F to discontinue grazing and allow members of the public to enjoy this beautiful park and to be enriched with opportunities to visit and appreciate this special place.

#6040

Name: Glover, Storm

Correspondence: To whom it may concern:

My name is Storm Glover and I am an advocate for increasing bicycle access in the Pt. Reyes area.

I currently do not ride my bicycle in the area often, mostly due to the fast-moving vehicular traffic and limited trail access. I often ride past the area, wishing there was a way I could connect more of the roads and trails. I am also unsure of bike-legal routes and do not want to take those risks.

I appreciate and support the improvements in public and bicycle access outlined under Alternatives B, C, D, E and F. I strongly support proposals that would lead to the planning and implementation of bicycle routes on trails,

ranch roads, and pathways throughout the planning area, including but not limited to: 1) a connection between Devil's Gulch and Platform Bridge Road using existing ranch roads, 2) a connection between Bolinas Ridge Trail at Olema Hill and Point Reyes Station to serve as an interim connection for the Cross Marin Trail, 3) a connection between Bolinas Ridge Trail and Five Brooks Stables using existing ranch roads 4) a connection between Drakes Estero and Abbotts Lagoon Trail using existing ranch roads, 5) a connection between Marshall Beach Trailhead and Pierce Point Road using existing ranch roads, and 6) an Estero Trail loop using existing ranch roads. I encourage NPS to collaborate with ranchers and other stakeholders to educate the public and address concerns related to public access on working ranch lands.

These improvements are important to me because it would increase the ease of access for all bicycles to visit the Seashore. I would feel much safer riding in the Pt. Reyes and surrounding areas on trails, pathways and ranch roads, rather than on roads shared with fast-moving traffic. Bicycling opportunities are currently very limited and fragmented; connectivity improvements and the creation of new loop options would inspire me to spend more time at the Seashore and surrounding areas on my bike.

Looking forward to seeing the progress here.

Best, Storm Glover

#6041

Name: Lautze, Susan

Correspondence: Dear NPS,

I understand that you are reviewing the possibility of expanding bike access to the Pt. Reyes national seashore. I write as both an avid hiker and mountain biker. Please consider opening up more of the non wilderness parts of Pt. Reyes to mountain bikers. There simply are not enough places to ride - it's way out of balance with too many areas designated as off limited to mountain bikers. I enjoy sharing the trails with horses, hikers and bikers alike. Please do what you can to bring more balance to this, especially by opening up ranch roads to mountain bikers at Pt. Reyes.

Thanks for your consideration of my views.

#6042

Name: Jones, Geoff

Correspondence: Please note my support for opening more trails to bicyclists in Pt Reyes and other parts of the GGNRA.

#6043

Name: Irwin, Jonathan

Correspondence: I'm writing to support the public access and bicycling improvements outlined under Alternatives B, C, D, E, and F. I strongly support proposals that would lead to the planning and implementation of bicycling routes on trails, ranch roads, and pathways throughout the planning area, including but not limited to: 1) a connection between Devil's Gulch and Platform Bridge Road using existing ranch roads, 2) a connection between Bolinas Ridge Trail at Olema Hill and Point Reyes Station to serve as an interim connection for the Cross Marin Trail, 3) a connection between Bolinas Ridge Trail and Five Brooks Stables using existing ranch roads 4) a connection between Drakes Estero and Abbotts Lagoon Trail using existing ranch roads, 5) a connection between Marshall Beach Trailhead and Pierce Point Road using existing ranch roads, and 6) an Estero Trail loop using

existing ranch roads. I encourage NPS to collaborate with ranchers and other stakeholders to educate the public and address concerns related to public access on working ranch lands.

The improvements outlined above would enable and encourage me to visit the Seashore more regularly-and by bike, rather than car. I would feel much safer riding in the Seashore and surrounding areas on trails, pathways, and ranch roads, rather than on roads shared with fast-moving vehicular traffic. Bicycling opportunities are currently very limited and fragmented, so any improvements in connectivity and the creation of new loop options would enable me to enjoy more of the Seashore and surrounding areas by bike.

#6044

Name: N/A, N/A

Correspondence: PLEASE DO NOT ALLOW ANY FURTHER GRAZING OF LIVESTOCK/DAIRY CATTLE ON THE POINT REYES NATIONAL SEASHORE!!! THERE IS ABSOLUTELY NO REASON WHY ANY OTHER ANIMAL NEEDS TO BE TAKEN FROM ITS HOME TO ACCOMMODATE RANCHERS!!! LEAVE WILDLIFE ALONE...GET RID OF RANCHING, WHICH ONLY SERVES TO DAMAGE POINT REYES!!!

#6045

Name: Justus-Rusconi, Valerie

Correspondence: UNACCEPTABLE!

#6046

Name: Gergel, Inna

Correspondence: I am writing to urge the National Park Service to discontinue the grazing of beef and dairy cattle at Point Reyes National Seashore. This precious area has been damaged by livestock grazing which poses a threat to the environment and local wildlife and it should be protected and used to serve the public good, and not for the benefit of the livestock industry.

I strongly oppose Option B and any other proposal that would be fatal to Tule Elk or other wildlife to the benefit of ranching operations, and encourage the agency to adopt Option F to discontinue grazing and allow members of the public to enjoy this beautiful park and to be enriched with opportunities to visit and appreciate this special place.

#6047

Name: N/A, N/A

Correspondence: I would like to urge the National Park Service to discontinue the grazing of beef and dairy cattle at Point Reyes National Seashore. Point Reyes is one of the great treasures of California, and livestock grazing poses a serious threat to the environment and to the local wildlife who help make it so unique and valuable.

Specifically, I strongly oppose Option B as well as any other proposal that would threaten our magnificent tule elk or any other wildlife that make this area their home. Instead, I strongly support Option F.

#6048

Name: Caplan, Lana

Correspondence: I am writing to urge the National Park Service to discontinue the grazing of beef and dairy cattle at Point Reyes National Seashore. This precious area has been damaged by livestock grazing which poses a threat to the environment and local wildlife and it should be protected and used to serve the public good, and not for the benefit of the livestock industry.

I strongly oppose Option B and any other proposal that would be fatal to Tule Elk or other wildlife to the benefit of ranching operations, and encourage the agency to adopt Option F to discontinue grazing and allow members of the public to enjoy this beautiful park and to be enriched with opportunities to visit and appreciate this special place.

#6049

Name: N/A, N/A

Correspondence: I am writing to urge the National Park Service to discontinue the grazing of beef and dairy cattle at Point Reyes National Seashore. This precious area has been damaged by livestock grazing which poses a threat to the environment and local wildlife and it should be protected and used to serve the public good, and not for the benefit of the livestock industry.

I strongly oppose Option B and any other proposal that would be fatal to Tule Elk or other wildlife to the benefit of ranching operations, and encourage the agency to adopt Option F to discontinue grazing and allow members of the public to enjoy this beautiful park and to be enriched with opportunities to visit and appreciate this special place.

#6050

Name: Freedman, Terri

Correspondence: Protect the elk and all of the natural world!

The small, mostly isolated population of Tule Elk are in danger due to cattle ranching at Point Reyes National Seashore. Point Reyes is currently the only national park in the country that hosts this subspecies of elk. Today, there are around 4,000 Tule Elk in total, all residing in California. This is in stark contrast to the population of 500,000 that existed in California just over 100 years ago.

Natural values, native wildlife, public access and enjoyment should take priority over commercial activities at Point Reyes.

Thank you.

#6051

Name: McMullen, Marilyn

Correspondence: Please do NOT kill any Tule elk in CA ; period . Please relocate them - there has GOT to be National Park /State Park lands where they can be relocated to .

#6052

Name: Harris, Lacey

Correspondence: I am writing to urge the National Park Service to discontinue the grazing of beef and dairy cattle at Point Reyes National Seashore. This precious area has been damaged by livestock grazing which poses a threat to the environment and local wildlife and it should be protected and used to serve the public good, and not for the benefit of the livestock industry.

I strongly oppose Option B and any other proposal that would be fatal to Tule Elk or other wildlife to the benefit of ranching operations, and encourage the agency to adopt Option F to discontinue grazing and allow members of the public to enjoy this beautiful park and to be enriched with opportunities to visit and appreciate this special place.

#6053

Name: Syben, Gregor

Correspondence: To whom it may concern,

I am writing to voice my support for the public access and bicycling improvements outlined under the Alternatives B, C, D, E, and F. Although I no longer live in Marin, I still spend a great deal of time there and visit the seashore regularly.

I strongly support proposals that would lead to the planning and implementation of bicycling routes on trails, ranch roads, and pathways throughout the planning area, including but not limited to: 1) a connection between Devil's Gulch and Platform Bridge Road using existing ranch roads, 2) a connection between Bolinas Ridge Trail at Olema Hill and Point Reyes Station to serve as an interim connection for the Cross Marin Trail, 3) a connection between Bolinas Ridge Trail and Five Brooks Stables using existing ranch roads 4) a connection between Drakes Estero and Abbotts Lagoon Trail using existing ranch roads, 5) a connection between Marshall Beach Trailhead and Pierce Point Road using existing ranch roads, and 6) an Estero Trail loop using existing ranch roads. I encourage NPS to collaborate with ranchers and other stakeholders to educate the public and address concerns related to public access on working ranch lands.

The improvements outlined above would enable and encourage me to visit the Seashore more regularly-and by bike, rather than car. I would feel much safer riding in the Seashore and surrounding areas on trails, pathways, and ranch roads, rather than on roads shared with fast-moving vehicular traffic. Bicycling opportunities are currently very limited and fragmented, so any improvements in connectivity and the creation of new loop options would enable me to enjoy more of the Seashore and surrounding areas by bike.

#6054

Name: N/A, N/A

Correspondence: I'm writing to support the public access and bicycling improvements outlined under Alternatives B, C, D, E, and F. I strongly support proposals that would lead to the planning and implementation of bicycling routes on trails, ranch roads, and pathways throughout the planning area, including but not limited to: 1) a connection between Devil's Gulch and Platform Bridge Road using existing ranch roads, 2) a connection between Bolinas Ridge Trail at Olema Hill and Point Reyes Station to serve as an interim connection for the Cross Marin Trail, 3) a connection between Bolinas Ridge Trail and Five Brooks Stables using existing ranch roads 4) a connection between Drakes Estero and Abbotts Lagoon Trail using existing ranch roads, 5) a connection between Marshall Beach Trailhead and Pierce Point Road using existing ranch roads, and 6) an Estero Trail loop using existing ranch roads. I encourage NPS to collaborate with ranchers and other stakeholders to educate the public and address concerns related to public access on working ranch lands.

The improvements outlined above would enable and encourage me to visit the Seashore more regularly-and by bike, rather than car. I would feel much safer riding in the Seashore and surrounding areas on trails, pathways, and ranch roads, rather than on roads shared with fast-moving vehicular traffic. Bicycling opportunities are currently very limited and fragmented, so any improvements in connectivity and the creation of new loop options would enable me to enjoy more of the Seashore and surrounding areas by bike.

#6055

Name: Busiek, Julia

Correspondence: Good morning, I support the following trail connections and plan elements:

A connection between Devil's Gulch and Platform Bridge Road using existing ranch roads.

A connection between Bolinas Ridge Trail at Olema Hill and Point Reyes Station to serve as an interim connection for the Cross Marin Trail.

A connection between Bolinas Ridge Trail and Five Brooks Stables using existing ranch roads.

A connection between Drakes Estero and Abbotts Lagoon Trail using existing ranch roads.

A connection between Marshall Beach Trailhead and Pierce Point Road using existing ranch roads.

An Estero Trail loop using existing ranch roads.

Collaboration with ranchers and other stakeholders to educate the public and address concerns related to public access on working ranch lands.

For the following reasons: All of these improvements would enable me to visit the Seashore by bike, rather than car.

I would feel much safer riding in Pt. Reyes National Seashore and surrounding areas on trails, pathways, and ranch roads, rather than on roads shared with fast-moving vehicular traffic.

Bicycling opportunities are currently very limited and fragmented; connectivity improvements and the creation of new loop options would enable me to enjoy more of the Seashore and surrounding areas by bike.

#6056

Name: Kitts, Margaret

Correspondence: We must protect our national parks at all costs. They are the legacy of every citizen of the United States. Their preservation and the waterways, natural resources, forests and the wild life therein as well as any recreational facilities must be maintained in good faith for generations to come without the invasion or destruction by fossil fuel companies or any third party trying to their resources for their own advantage or gain. This was clearly the intent of our forefathers and honored until the present time when the economic interests fossil fuel industry, corporate greed and shortsightedness threaten their existence and maintenance. These properties were meant to be recreational, inspirational, and educational, not to be threatened as resources for economic gain. Many were reserved as cultural assets and for the benefit of Native American communities residing within or nearby. Furthermore, in this time of rapid, negative , they climate change, they are essential to preserve endangered ecosystems and the very air we breathe.

#6057

Name: Garza, Anna

Correspondence: I am writing to urge the National Park Service to discontinue the grazing of beef and dairy cattle at Point Reyes National Seashore. This precious area has been damaged by livestock grazing which poses a threat to the environment and local wildlife and it should be protected and used to serve the public good, and not for the benefit of the livestock industry.

My family, grandchildren, and I often spend time on the Point Reyes Peninsula. The land, natural habitats, and wildlife there is very important to us as Californian citizens. We want to see this area protected and preserved for generations to come. I am horrified at the suggestion that the Tule Elk be killed off for the personal benefit of cattle ranchers. One animal is not more important than another. The Tule have resided on this land long before ranchers began to take advantage of it.

I strongly oppose Option B and any other proposal that would be fatal to Tule Elk or other wildlife to the benefit of ranching operations, and encourage the agency to adopt Option F to discontinue grazing and allow members of

the public to enjoy this beautiful park and to be enriched with opportunities to visit and appreciate this special place.

#6058

Name: Lupenko, Andy

Correspondence: Point Reyes National Seashore is supposed to be managed under the Point Reyes Act for "maximum protection, restoration, and preservation of the natural environment." There's no mandate for prioritizing commercial agricultural leases on these public lands. Natural values, native wildlife, public access and enjoyment should take priority over commercial activities at Point Reyes. Tule elk are an important part of the landscape at Point Reyes. Their recovery is a result of successful native ecosystem restoration, which is a key element of the Park Service's mission. It's taken a lot of time, money and effort to restore tule elk to Point Reyes, the only national park where they live. Tule elk should be allowed to roam free and forage in the park - not shot, removed, fenced or treated as problem animals. Right now the Point Reyes ranches enjoy not only subsidized grazing fees and housing, but also taxpayer-funded infrastructure and road improvements, and publicly funded projects. But commercial activities at Point Reyes should be required to accommodate native wildlife - not the other way around. The Park Service shouldn't allow any new agricultural activities at Point Reyes. Planting artichokes or other row crops will attract birds. And introducing sheep, goats, pigs or chickens will attract native predators such as coyotes, bobcats and foxes. Expanded ranching would only create new wildlife conflicts. Cattle ranching should only be allowed if it's consistent with preserving the natural environment. And agricultural activities such as mowing shouldn't be allowed in park areas where they harm endangered species or wildlife habitat, impair water quality, cause excessive erosion or spread invasive plants/diseases. Cattle are the seashore's primary source of greenhouse gases. So the Park Service's preferred alternative is inconsistent with its own "Climate Friendly Parks" plan.

#6059

Name: N/A, N/A

Correspondence: I am writing to urge the National Park Service to discontinue the grazing of beef and dairy cattle at Point Reyes National Seashore. This precious area has been damaged by livestock grazing which poses a threat to the environment and local wildlife and it should be protected and used to serve the public good, and not for the benefit of the livestock industry.

I strongly oppose Option B and any other proposal that would be fatal to Tule Elk or other wildlife to the benefit of ranching operations, and encourage the agency to adopt Option F to discontinue grazing and allow members of the public to enjoy this beautiful park and to be enriched with opportunities to visit and appreciate this special place.

#6060

Name: Napier, Kimberly

Correspondence: I am writing to urge the National Park Service to discontinue the grazing of beef and dairy cattle at Point Reyes National Seashore. This precious area has been damaged by livestock grazing which poses a threat to the environment and local wildlife and it should be protected and used to serve the public good, and not for the benefit of the livestock industry.

I strongly oppose Option B and any other proposal that would be fatal to Tule Elk or other wildlife to the benefit of ranching operations, and encourage the agency to adopt Option F to discontinue grazing and allow members of the public to enjoy this beautiful park and to be enriched with opportunities to visit and appreciate this special place.

#6061



Name: Jessler, Darynne

Correspondence: I am writing to urge the National Park Service to discontinue the grazing of beef and dairy cattle at Point Reyes National Seashore. This precious area has been damaged by livestock grazing which poses a threat to the environment and local wildlife and it should be protected and used to serve the public good, and not for the benefit of the livestock industry.

I strongly oppose Option B and any other proposal that would be fatal to Tule Elk or other wildlife to the benefit of ranching operations, and encourage the agency to adopt Option F to discontinue grazing and allow members of the public to enjoy this beautiful park and to be enriched with opportunities to visit and appreciate this special place.

#6062

Name: covault, jonnell

Correspondence: I grew up in Marin. The day I got my driver's license I drove to Limantour. Whenever we could, our family enjoyed bicycling, hiking, beach walking and eating oysters in West Marin. When we would see Tule Elk, we would get so excited, because they are different and unique to the area. ANYTHING you do to curtail their freedom or harm them pisses me off. West Marin is one of the most beautiful places in the world and should not be regulated by cattle ranchers. The last time I was hiking in Marin I actually spent most of the time dodging cow patties! Elk are more harmonious with the natural environment than cows. You got rid of an oyster farm because it was not "natural". Get rid of the cows! Leave the Tule Elk to graze where they want. West Marin is a destination for tourists and nature lovers because of it's beauty and wildlife. Please protect the wild creatures that live there!

#6063

Name: Kelly, Erin

Correspondence: I am writing to urge the National Park Service to discontinue the grazing of beef and dairy cattle at Point Reyes National Seashore. This precious area has been damaged by livestock grazing which poses a threat to the environment and local wildlife and it should be protected and used to serve the public good, and not for the benefit of the livestock industry.

I strongly oppose Option B and any other proposal that would be fatal to Tule Elk or other wildlife to the benefit of ranching operations, and encourage the agency to adopt Option F to discontinue grazing and allow members of the public to enjoy this beautiful park and to be enriched with opportunities to visit and appreciate this special place.

#6064

Name: Crawford, Holly

Correspondence: Commercial agriculture should never be valued over wildlife. We are destroying our planet and everything on it!

#6065

Name: Wilson, Sam

Correspondence: I'm writing to support the public access and bicycling improvements outlined under Alternatives B, C, D, E, and F. I strongly support proposals that would lead to the planning and implementation of bicycling routes on trails, ranch roads, and pathways throughout the planning area, including but not limited to: 1) a connection between Devil's Gulch and Platform Bridge Road using existing ranch roads, 2) a connection between Bolinas Ridge Trail at Olema Hill and Point Reyes Station to serve as an interim connection for the Cross Marin Trail, 3) a connection between Bolinas Ridge Trail and Five Brooks Stables using existing ranch roads 4) a connection between Drakes Estero and Abbotts Lagoon Trail using existing ranch roads, 5) a connection between

Marshall Beach Trailhead and Pierce Point Road using existing ranch roads, and 6) an Estero Trail loop using existing ranch roads. I encourage NPS to collaborate with ranchers and other stakeholders to educate the public and address concerns related to public access on working ranch lands.

The improvements outlined above would enable and encourage me to visit the Seashore more regularly-and by bike, rather than car. I would feel much safer riding in the Seashore and surrounding areas on trails, pathways, and ranch roads, rather than on roads shared with fast-moving vehicular traffic. Bicycling opportunities are currently very limited and fragmented, so any improvements in connectivity and the creation of new loop options would enable me to enjoy more of the Seashore and surrounding areas by bike.

I also want to state my support for permitting e-bikes to have equal access to public lands. As someone entering the eighth decade of life my stamina has become diminished, yet I am still capable and am increasingly aware of the need to look for the safety of myself and others on the trails.

#6066

Name: Guy, Otis

Correspondence: I'm writing to support the public access and bicycling improvements outlined under Alternatives B, C, D, E, and F. I strongly support proposals that would lead to the planning and implementation of bicycling routes on trails, ranch roads, and pathways throughout the planning area, including but not limited to: 1) a connection between Devil's Gulch and Platform Bridge Road using existing ranch roads, 2) a connection between Bolinas Ridge Trail at Olema Hill and Point Reyes Station to serve as an interim connection for the Cross Marin Trail, 3) a connection between Bolinas Ridge Trail and Five Brooks Stables using existing ranch roads 4) a connection between Drakes Estero and Abbotts Lagoon Trail using existing ranch roads, 5) a connection between Marshall Beach Trailhead and Pierce Point Road using existing ranch roads, and 6) an Estero Trail loop using existing ranch roads. I encourage NPS to collaborate with ranchers and other stakeholders to educate the public and address concerns related to public access on working ranch lands.

The improvements outlined above would enable and encourage me to visit the Seashore more regularly-and by bike, rather than car. I would feel much safer riding in the Seashore and surrounding areas on trails, pathways, and ranch roads, rather than on roads shared with fast-moving vehicular traffic. Bicycling opportunities are currently very limited and fragmented, so any improvements in connectivity and the creation of new loop options would enable me to enjoy more of the Seashore and surrounding areas by bike.

I was a Boy Scout and witnessed Lady Bird Johnson dedicating Pt Reyes National Park. Please make it more accessible to cyclists. It is such a beautiful area.

Thanks, Otis

#6067

Name: Samuels, Mike

Correspondence: Bikes are here to stay and will only increase in popularity. Just more riders, more riders on e-bikes, high schools have mountain bike teams (whose riders will ride after high school). So we need to make more trails available. hey, and how about more bike lanes and safety measures for road riders.

#6068

Name: Busse, Millie

Correspondence: I am writing to urge the National Park Service to discontinue the grazing of beef and dairy cattle at Point Reyes National Seashore. This precious area has been damaged by livestock grazing which poses a threat to the environment and local wildlife and it should be protected and used to serve the public good, and not for the benefit of the livestock industry.

I strongly oppose Option B and any other proposal that would be fatal to Tule Elk or other wildlife to the benefit of ranching operations, and encourage the agency to adopt Option F to discontinue grazing and allow members of the public to enjoy this beautiful park and to be enriched with opportunities to visit and appreciate this special place.

#6069

Name: Fisch, Steve

Correspondence: I fully support increased access for bicycles in the national seashore. I support Marin County Bicycle Coalition's position on these proposed improvements. Thank you for considering expanded access - it will greatly increase my family's enjoyment of the park.

I'm writing to support the public access and bicycling improvements outlined under Alternatives B, C, D, E, and F. I strongly support proposals that would lead to the planning and implementation of bicycling routes on trails, ranch roads, and pathways throughout the planning area, including but not limited to: 1) a connection between Devil's Gulch and Platform Bridge Road using existing ranch roads, 2) a connection between Bolinas Ridge Trail at Olema Hill and Point Reyes Station to serve as an interim connection for the Cross Marin Trail, 3) a connection between Bolinas Ridge Trail and Five Brooks Stables using existing ranch roads 4) a connection between Drakes Estero and Abbotts Lagoon Trail using existing ranch roads, 5) a connection between Marshall Beach Trailhead and Pierce Point Road using existing ranch roads, and 6) an Estero Trail loop using existing ranch roads. I encourage NPS to collaborate with ranchers and other stakeholders to educate the public and address concerns related to public access on working ranch lands.

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#6070

Name: Neeley, Thomas

Correspondence: I'm writing to support the public access and bicycling improvements outlined under Alternatives B, C, D, E, and F. I strongly support proposals that would lead to the planning and implementation of bicycling routes on trails, ranch roads, and pathways throughout the planning area, including but not limited to: 1) a connection between Devil's Gulch and Platform Bridge Road using existing ranch roads, 2) a connection between Bolinas Ridge Trail at Olema Hill and Point Reyes Station to serve as an interim connection for the Cross Marin Trail, 3) a connection between Bolinas Ridge Trail and Five Brooks Stables using existing ranch roads 4) a connection between Drakes Estero and Abbotts Lagoon Trail using existing ranch roads, 5) a connection between Marshall Beach Trailhead and Pierce Point Road using existing ranch roads, and 6) an Estero Trail loop using existing ranch roads. I encourage NPS to collaborate with ranchers and other stakeholders to educate the public and address concerns related to public access on working ranch lands.

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#6071

Name: Nawbary, Susan

Correspondence: I'm writing to support the public access and bicycling improvements outlined under

Alternatives B, C, D, E, and F. I strongly support proposals that would lead to the planning and implementation of bicycling routes on trails, ranch roads, and pathways throughout the planning area, including but not limited to: 1) a connection between Devil's Gulch and Platform Bridge Road using existing ranch roads, 2) a connection between Bolinas Ridge Trail at Olema Hill and Point Reyes Station to serve as an interim connection for the Cross Marin Trail, 3) a connection between Bolinas Ridge Trail and Five Brooks Stables using existing ranch roads 4) a connection between Drakes Estero and Abbotts Lagoon Trail using existing ranch roads, 5) a connection between Marshall Beach Trailhead and Pierce Point Road using existing ranch roads, and 6) an Estero Trail loop using existing ranch roads. I encourage NPS to collaborate with ranchers and other stakeholders to educate the public and address concerns related to public access on working ranch lands.

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#6072

Name: Devlin, Summer

Correspondence: This country, and our politicians, are starting to be run by wealthy ranchers and cattlemen. They want to decimate native wildlife and our wild horses and burros. When are our politicians going to put their foots down and say "NO MORE"?

#6073

Name: Raymond, David

Correspondence: I am writing to urge the National Park Service to discontinue the grazing of beef and dairy cattle at Point Reyes National Seashore. This precious area has been damaged by livestock grazing which poses a threat to the environment and local wildlife and it should be protected and used to serve the public good, and not for the benefit of the livestock industry.

I strongly oppose Option B and any other proposal that would be fatal to Tule Elk or other wildlife to the benefit of ranching operations, and encourage the agency to adopt Option F to discontinue grazing and allow members of the public to enjoy this beautiful park and to be enriched with opportunities to visit and appreciate this special place.

I go to Point Reyes regularly and I have always been disturbed that much of this public land is given over to dairy and cattle farming. I am outraged about this. Buy them out, let the people living there now stay for the rest of their lives - give them jobs in the park if they want; but get rid of all the cattle and then restore the land. You could get thousands of volunteers from the Bay Area to participate in restoration activities; there are millions of people in the Bay Area.

#6074

Name: McGinness, Macy

Correspondence: I am writing to urge the National Park Service to discontinue the grazing of beef and dairy cattle at Point Reyes National Seashore. This precious area has been damaged by livestock grazing which poses a threat to the environment and local wildlife and it should be protected and used to serve the public good, and not for the benefit of the livestock industry.

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the public to enjoy this beautiful park and to be enriched with opportunities to visit and appreciate this special place.

#6075

Name: Melton, William

Correspondence: Dear NPS,

I wholeheartedly support any expanded biking access in Pt Reyes NS. I would not be in favor of ebikes however having access to trails in the park. Thank you for your careful thought and consideration to expanded bike access.

Best,

Bill Melton

#6076

Name: Dagher, Carrie

Correspondence: Please stop using wildlife habitat for livestock and never kill wildlife for any purpose.

#6077

Name: Jones, Dane

Correspondence: I urge you to NOT do anything to harm the tule elk population of Point Reyes National Seashore. These animals are vital to the long-term conservation of the invaluable resources. The tule elk should be protected at all costs. Commercial activities should not take priority over natural species protection and preservation.

Thank you.

#6078

Name: Laxier, Scott

Correspondence: What is sustainable? That is the prism through which all of our decisions should be considered. Lobbyists, politicians, dark money is not integral; it depends on greed and deceit. If Science is perpetually marginalized and discounted, our once-decent country will continue to slide towards peril and quantified destruction. This is not an opinion. It is a universal truth. Who has the courage to stand up to greed and deceit.

Too many humans too comfortable. And we all pay the price.

#6079

Name: Gaiser, Jörg

Correspondence: Dear Ladies and Gentlemen,

Thank you for the possibility to comment this issue.

Point Reyes National Seashore is supposed to be managed under the Point Reyes Act for "maximum protection, restoration, and preservation of the natural environment." There's no mandate for prioritizing commercial agricultural leases on these public lands, so I think that natural values, native wildlife, public access and enjoyment should take priority over commercial activities at Point Reyes.

Tule elk are an important part of the landscape at Point Reyes. Their recovery is a result of successful native ecosystem restoration, which is a key element of the Park Service's mission. It's taken a lot of time, money and effort to restore tule elk to Point Reyes, the only national park where they live. Tule elk should be allowed to roam free and forage in the park - not shot, removed, fenced or treated as problem animals.

Right now the Point Reyes ranches enjoy not only subsidized grazing fees and housing, but also taxpayer-funded infrastructure and road improvements, and publicly funded projects. But commercial activities at Point Reyes should be required to accommodate native wildlife - not the other way around. The Park Service shouldn't allow any new agricultural activities at Point Reyes. Planting artichokes or other row crops will attract birds. And introducing sheep, goats, pigs or chickens will attract native predators such as coyotes, bobcats and foxes. Expanded ranching would only create new wildlife conflicts.

Cattle ranching should only be allowed if it's consistent with preserving the natural environment. And agricultural activities such as mowing shouldn't be allowed in park areas where they harm endangered species or wildlife habitat, impair water quality, cause excessive erosion or spread invasive plants/diseases.

Cattle are the seashore's primary source of greenhouse gases. So the Park Service's preferred alternative is inconsistent with its own "Climate Friendly Parks" plan.

Sincerely,

Jörg Gaiser Baiersbronn Germany

#6080

Name: Biggins, Sean

Correspondence: I am writing to urge the National Park Service to discontinue the grazing of beef and dairy cattle at Point Reyes National Seashore. This precious area has been damaged by livestock grazing which poses a threat to the environment and local wildlife and it should be protected and used to serve the public good, and not for the benefit of the livestock industry.

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#6081

Name: Marrow, Madeline

Correspondence: I am writing to urge the National Park Service to discontinue the grazing of beef and dairy cattle at Point Reyes National Seashore. This precious area has been damaged by livestock grazing which poses a threat to the environment and local wildlife and it should be protected and used to serve the public good, and not for the benefit of the livestock industry.

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A national park is no place for livestock! I love seeing the wild tule elk there! Cattle contribute to global warming too, the world needs to learn to eat less meat.

A National Park should be a model for ecological principles.

#6082

Name: Movsesyan, Greg

Correspondence: Point Reyes belongs to the wildlife there, not the moneyed interests in the rest of the country.

#6083

Name: Kelso-Haines, Sue

Correspondence: To Whom it May Concern,

I am writing to OPPOSE The Point Reyes National Seashore General Management Plan Amendment and Environmental Impact Statement proposal that will dedicate one third of Point Reyes National Seashore to cattle ranching and includes plans to kill Tule elk that use the area. The stated mission of The National Park Service (NPS) is to preserve unimpaired the natural and cultural resources and values of the National Park System. When so many, many wildlife species are in steep decline in North America and worldwide, I am stunned to learn that the NPS is considering actions that could negatively effect the Tule Elk population when they number only around 600 animals. Expanding livestock grazing and shooting/hunting elk that wander into grazing areas is a despicable policy. Wildlife populations are at a significant and critical turning point due to loss of habitat and poor decisions and pressure by humans. Point Reyes National Seashore needs to focus on enhancing and protecting the Tule Elk and their habitat, not selling out to livestock interests! The National Parks are national treasures. Further erosion of ideals and policies related to preserving and managing these amazing assets is a sad statement about humanity. I implore the National Park Service to fulfill its mission!

#6084

Name: Langille , Celeste

Correspondence: My family of four recently visited Pt Reyes and the Tule Elk preserve in August. We loved our time hiking and listening to the sound of the Tule Elk. We visited Pt Reyes specifically because of the beauty of the park and the unique and wild majesty of the Tule elk. Pt Reyes National Seashore must be managed under the Point Reyes Act for "maximum protection, restoration, and preservation of the natural environment." The public interest, including taxpayer values, and protection of natural resources must be top priorities-and not the protection of a few private commercial interests. There is plenty of agricultural land and cows nearby on non-public land. Tule elk are an essential visitor draw and an important part of the landscape at Point Reyes. Their recovery is a result of successful native ecosystem restoration, which is a key element of the Park Service's mission. Tule elk should be allowed to roam free and forage in the park - not killed to allow domestic cattle. That is a horrible and tragic choice. Stop subsidizing private cattle owners and grazing fees and housing. Follow the Park Service mandate and protect public resources including the tule elk-a national treasure. The Park Service shouldn't allow any new private ventures in public land. Expanded ranching or agriculture would only create new wildlife conflicts. Analyze the cost to taxpayers to subsidize these private interests Analyze climate change impacts: Cattle are the seashore's primary source of greenhouse gases. So the Park Service's preferred alternative is inconsistent with its own "Climate Friendly Parks" plan. Protecting wildlife at a time of changing climate must be a federal agency priority.

#6085

Name: Sugarman, Stevie

Correspondence: You are going to shoot, and allow shooting, of Tule Elk to benefit the dairy industry?? Are you kidding me?

The National Park Service is siding with cattle ranching over the sole remaining and dwindling population of endemic Tule Elk?

What the hell is wrong with you? More to the point, how much are you being paid (bribed) to push this ill-fated plan?

#6086

Name: Lundquist, Sabrina

Correspondence: To Whom It May Concern,

I recently heard that there is discussion that you may hunt/kill the Native Elk to allow more grazing for exploited cows, etc. This is very concerning to me given that this is public land. Please let the native elk live and wander in their natural habitat and stop leasing our public land for more cattle. The Elk deserve their land and it is not for you to decide to kill them so more private companies exploiting animals can prosper even more than they already are. I strongly urge you to take care of the native animals on our land and let the Elk stay.

Thank You, Sabrina Lundquist

#6087

Name: Kellen, Ric

Correspondence: Hello,

I'm writing to support the public access and bicycling improvements outlined under Alternatives B, C, D, E, and F. I strongly support proposals that would lead to the planning and implementation of bicycling routes on trails, ranch roads, and pathways throughout the planning area, including but not limited to: 1) a connection between Devil's Gulch and Platform Bridge Road using existing ranch roads, 2) a connection between Bolinas Ridge Trail at Olema Hill and Point Reyes Station to serve as an interim connection for the Cross Marin Trail, 3) a connection between Bolinas Ridge Trail and Five Brooks Stables using existing ranch roads 4) a connection between Drakes Estero and Abbotts Lagoon Trail using existing ranch roads, 5) a connection between Marshall Beach Trailhead and Pierce Point Road using existing ranch roads, and 6) an Estero Trail loop using existing ranch roads. I encourage NPS to collaborate with ranchers and other stakeholders to educate the public and address concerns related to public access on working ranch lands.

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Thank you, Ric Kelen

#6088

Name: Braunschweig, Brook

Correspondence: Hello. I am writing to urge the National Park Service to discontinue the grazing of beef and dairy cattle at Point Reyes National Seashore. This precious area has been damaged by livestock grazing which poses a threat to the environment and local wildlife and it should be protected and used to serve the public good, and not for the benefit of the livestock industry.

I strongly oppose Option B and any other proposal that would be fatal to Tule Elk or other wildlife to the benefit of ranching operations, and encourage the agency to adopt Option F to discontinue grazing and allow members of the public to enjoy this beautiful park and to be enriched with opportunities to visit and appreciate this special place.



#6089

Name: Wolcott, James

Correspondence: <https://default.salsalabs.org/Te955a8bf-9832-4912-b93c-3c0aaea8cc44/52a8bf4-475a-4323-9d5b-6622a63feef>

#6090

Name: Freeman, Sherry

Correspondence: I am writing to urge the National Park Service to discontinue the grazing of beef and dairy cattle at Point Reyes National Seashore. This precious area has been damaged by livestock grazing which poses a threat to the environment and local wildlife and it should be protected and used to serve the public good, and not for the benefit of the livestock industry.

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#6091

Name: Porro, John

Correspondence: I frequently hike in Pt Reyes and see great potential in opening the land to bicycles. It will draw more visitors to the park and increase its support.

#6092

Name: Morton, Tiffany

Correspondence: Thank you for taking public comments about Point Reyes National Park. To begin I am a huge fan of the outdoors and frequent our national parks and recreation areas with my family and friends. I'm very concerned about the elk population and what opening this area up to ranchers will do to the natural habitat. Please consider what we really need globally is to reduce greenhouse gases. Cattle farming will only increase these gases and add to the decline of the human race. We need to be progressive on a local level and promote leaving the natural habitat in place for future generations. You can be the forward thinking and acting force for others to follow. It will let the elk breed freely and let us all enjoy this pristine land for generations to come. This is an important issue and I'm so thankful you are open to hearing all sides.

#6093

Name: Travers, Chris

Correspondence: I'm writing to support the public access and bicycling improvements outlined under Alternatives B, C, D, E, and F. I strongly support proposals that would lead to the planning and implementation of bicycling routes on trails, ranch roads, and pathways throughout the planning area, including but not limited to: 1) a connection between Devil's Gulch and Platform Bridge Road using existing ranch roads, 2) a connection between Bolinas Ridge Trail at Olema Hill and Point Reyes Station to serve as an interim connection for the Cross Marin Trail, 3) a connection between Bolinas Ridge Trail and Five Brooks Stables using existing ranch roads 4) a connection between Drakes Estero and Abbotts Lagoon Trail using existing ranch roads, 5) a connection between Marshall Beach Trailhead and Pierce Point Road using existing ranch roads, and 6) an Estero Trail loop using existing ranch roads. I encourage NPS to collaborate with ranchers and other stakeholders to educate the public and address concerns related to public access on working ranch lands.

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ranch roads, rather than on roads shared with fast-moving vehicular traffic. Bicycling opportunities are currently very limited and fragmented, so any improvements in connectivity and the creation of new loop options would enable me to enjoy more of the Seashore and surrounding areas by bike.

#6094

Name: Wilcox, Antoinette

Correspondence: Tule elk are an important part of the landscape at Point Reyes. Their recovery is a result of successful native ecosystem restoration, which is a key element of the Park Service's mission. It's taken a lot of time, money and effort to restore tule elk to Point Reyes, the only national park where they live. Tule elk should be allowed to roam free and forage in the park - not shot, removed, fenced or treated as problem animals.

#6095

Name: Stark, Mary

Correspondence: I am writing to urge the National Park Service to discontinue the grazing of beef and dairy cattle at Point Reyes National Seashore. This precious area has been damaged by livestock grazing which poses a threat to the environment and local wildlife and it should be protected and used to serve the public good, and not for the benefit of the livestock industry.

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#6096

Name: Adelman, Ryan

Correspondence: I'm writing to support the public access and bicycling improvements outlined under Alternatives B, C, D, E, and F. I strongly support proposals that would lead to the planning and implementation of bicycling routes on trails, ranch roads, and pathways throughout the planning area, including but not limited to: 1) a connection between Devil's Gulch and Platform Bridge Road using existing ranch roads, 2) a connection between Bolinas Ridge Trail at Olema Hill and Point Reyes Station to serve as an interim connection for the Cross Marin Trail, 3) a connection between Bolinas Ridge Trail and Five Brooks Stables using existing ranch roads 4) a connection between Drakes Estero and Abbotts Lagoon Trail using existing ranch roads, 5) a connection between Marshall Beach Trailhead and Pierce Point Road using existing ranch roads, and 6) an Estero Trail loop using existing ranch roads. I encourage NPS to collaborate with ranchers and other stakeholders to educate the public and address concerns related to public access on working ranch lands.

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I often ride my road bike through the park and have for years looked for options off-road that are safer and more varied and that provide different entry/exit points to the park from highway 1 and Bolinas ride so I can take my family on safer bike route.

Thank you,

Ryan Adelman

#6097

Name: barakat, angelica

Correspondence: I am writing to urge the National Park Service to discontinue the grazing of beef and dairy cattle at Point Reyes National Seashore. This precious area has been damaged by livestock grazing which poses a threat to the environment and local wildlife and it should be protected and used to serve the public good, and not for the benefit of the livestock industry.

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#6098

Name: I, R

Correspondence: Please do not kill wildlife for commercial agriculture any more. Save the elks!!!

#6099

Name: Maurer, James

Correspondence: I visit my cousins Ginny, Mary Kay and their families who live in Sonoma County every few years. Although that is the primary reason for my trips to California from Wisconsin the natural beauty and temperate climate is an extra bonus. I have been to Point Reyes National Seashore many times alone and with my cousins when they are off work. It is a place that has a wide diversity of habitats and stunning vistas. When Ginny emailed me information concerning the expansion of agricultural grazing on PRNS property I was extremely dismayed.

After studying the details I believe that it is obvious that expanding cattle and or dairy cow grazing is in direct conflict with the preservation of the native wildlife habitat which includes the fragmented habitat of the fragile population of the Tule elk. I also understand that the preferred plan of the National Park Service includes culling the already low population of Tule Elk by encouraging shooting Tule elk that cross into areas specifically designated for ranching. The NPS should put the sustainability of wildlife and their habitats as their top priority on PRNS property and not succumb to pressure from local cattle ranchers. To be clear I am in complete opposition to this grazing expansion option.

#6100

Name: Springsteen, Norma

Correspondence: I am writing to urge the National Park Service to discontinue the grazing of beef and dairy cattle at Point Reyes National Seashore. This precious area has been damaged by livestock grazing which poses a threat to the environment and local wildlife and it should be protected and used to serve the public good, and not for the benefit of the livestock industry.

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#6101

Name: Wallace, Holly

Correspondence: Federal land is land that belongs to the public. It is not public land that may be used by a few ranchers on which they can profit. We must preserve our open spaces, not destroy the natural habitat for personal gain. I urge you to protect the native flora and fauna for the benefit of all.

#6102

Name: N/A, N/A

Correspondence: I am writing to urge the National Park Service to discontinue the grazing of beef and dairy cattle at Point Reyes National Seashore. This precious area has been damaged by livestock grazing which poses a threat to the environment and local wildlife and it should be protected and used to serve the public good, and not for the benefit of the livestock industry.

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#6103

Name: Moeller, Richard

Correspondence: I'm writing to support the public access and bicycling improvements outlined under Alternatives B, C, D, E, and F. I strongly support proposals that would lead to the planning and implementation of bicycling routes on trails, ranch roads, and pathways throughout the planning area, including but not limited to: 1) a connection between Devil's Gulch and Platform Bridge Road using existing ranch roads, 2) a connection between Bolinas Ridge Trail at Olema Hill and Point Reyes Station to serve as an interim connection for the Cross Marin Trail, 3) a connection between Bolinas Ridge Trail and Five Brooks Stables using existing ranch roads 4) a connection between Drakes Estero and Abbotts Lagoon Trail using existing ranch roads, 5) a connection between Marshall Beach Trailhead and Pierce Point Road using existing ranch roads, and 6) an Estero Trail loop using existing ranch roads. I encourage NPS to collaborate with ranchers and other stakeholders to educate the public and address concerns related to public access on working ranch lands.

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#6104

Name: Moran, Julie

Correspondence: I am writing to urge the National Park Service to discontinue the grazing of beef and dairy cattle at Point Reyes National Seashore. This precious area has been damaged by livestock grazing which poses a threat to the environment and local wildlife and it should be protected and used to serve the public good, and not for the benefit of the livestock industry.

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#6105

Name: Meyer, Eric

Correspondence: Cows do not belong in a natural area. Harm the plants and erode land.

#6106

Name: P, M

Correspondence: I am writing to urge the National Park Service to discontinue the grazing of beef and dairy cattle at Point Reyes National Seashore. This precious area has been damaged by livestock grazing which poses a threat to the environment and local wildlife and it should be protected and used to serve the public good, and not for the benefit of the livestock industry.

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#6107

Name: Baik, Hejin

Correspondence: Do some to protect and save our California Tule Elk. My family visited Pointey Reyes last week to visit elephant habitat, near the Chimney Road. Thankfully, we could see two big groups of them by the beach.

On the way back in the car, my father -in-law has found a mother and a young Tule Elks standing, watching us in the distance on top of a small hill. They have been the owner of this land, since before we human build our own houses here. It's sad that their habitat is threatened as times goes, while people have rifles.

We visited bear camp visitor center, met this campaign front of the yard.

#6108

Name: Albertine , Gisele

Correspondence: To Whom it May Concern,

Thank you for accepting my comments on the NPS DEI on Point Reyes National Seashore.

I am strongly against using National Park Land for grazing cattle. Cattle are bad for our air and native wildlife. I don't go to National Parks to see cattle, but to see native wildlife, which will be damaged, even destroyed, by cattle grazing as a direct result of trampling land, polluting our water, and indirectly by the management involved in raising cattle..

My question is, why are a few ranchers getting priority over the public at large, and on PUBLIC land? Why are they even subsidized by taxpayer money?

Tule Elk are native animals, and should be given priority in our National Parks. We have already destroyed so many non-human species, for the sake of a few humans' wealth.

Please do as you state in your mission, protect and conserve "native species and ecosystem processes."

Prioritize and protect Tule Elk and all native species.

#6109

Name: Couch, Crystal

Correspondence: I am writing to STRONGLY URGE the National Park Service to discontinue the grazing of beef and dairy cattle at Point Reyes National Seashore. This precious area has been damaged by livestock grazing and poses a threat to the environment and local wildlife. The land must be protected and used to serve the public good; the public land does not exist just for the financial benefit of the livestock industry. Decisions must be made that consider the common good - not just the bank accounts of an industry.

I STRONGLY OPPOSE Option B AND ANY OTHER PROPOSAL that would negatively impact Tule Elk or other wildlife to the SOLE benefit of ranching operations, and encourage the agency to adopt Option F to DISCONTINUE GRAZING and allow members of the public to enjoy this beautiful park and to be enriched with opportunities to visit and appreciate this special place.

#6110

Name: Smith, Nancy

Correspondence: I am writing to urge the National Park Service to discontinue the grazing of beef and dairy cattle at Point Reyes National Seashore. This precious area has been damaged by livestock grazing which poses a threat to the environment and local wildlife and it should be protected and used to serve the public good, and not for the benefit of the livestock industry.

I strongly oppose Option B and any other proposal that would be fatal to Tule Elk or other wildlife to the benefit of ranching operations, and encourage the agency to adopt Option F to discontinue grazing and allow members of the public to enjoy this beautiful park and to be enriched with opportunities to visit and appreciate this special place.

#6111

Name: Middlesworth, Steven

Correspondence: Please preserve wildlife at Point Reyes. Livestock are not a replacement.

#6112

Name: N/A, Marina

Correspondence: I am writing to urge the National Park Service to discontinue the grazing of beef and dairy cattle at Point Reyes National Seashore. This precious area has been damaged by livestock grazing which poses a threat to the environment and local wildlife and it should be protected and used to serve the public good, and not for the benefit of the livestock industry.

I strongly oppose Option B and any other proposal that would be fatal to Tule Elk or other wildlife to the benefit of ranching operations, and encourage the agency to adopt Option F to discontinue grazing and allow members of the public to enjoy this beautiful park and to be enriched with opportunities to visit and appreciate this special place.

Growing up in the Bay Area and seeing all the land developed for housing/retail has made me more passionate about preserving our natural land and native species. Grazing of cattle is not more important than the lives and homes of our native species.

#6113

Name: Adams, Samuel

Correspondence:

I'm writing to support the public access and bicycling improvements outlined under Alternatives B, C, D, E, and F. I strongly support proposals that would lead to the planning and implementation of bicycling routes on trails,

ranch roads, and pathways throughout the planning area, including but not limited to: 1) connecting Devil's Gulch to Platform Bridge Road using existing ranch roads, 2) connecting Bolinas Ridge Trail at Olema Hill to Point Reyes Station 3) connecting Bolinas Ridge Trail to Five Brooks Stables using existing ranch roads 4) connecting Drakes Estero and Abbotts Lagoon Trail using existing ranch roads, 5) connecting Marshall Beach Trailhead and Pierce Point Road using existing ranch roads, and 6) an Estero Trail loop using existing ranch roads.

I encourage NPS to collaborate with ranchers and other stakeholders to educate the public and address concerns related to public access on working ranch lands.

The improvements outlined above would enable and encourage me to visit the Seashore more regularly-and by bike, rather than car. I would feel much safer riding in the Seashore and surrounding areas on trails, pathways, and ranch roads, rather than on roads shared with fast-moving vehicular traffic. Bicycling opportunities are currently very limited and fragmented, so any improvements in connectivity and the creation of new loop options would enable me to enjoy more of the Seashore and surrounding areas by bike

#6114

Name: Springstead, Wendy

Correspondence: Why were they put there in the 1st place? It's not right to just kill them out-right. There has to be another way to "thin" the herd(s).

#6115

Name: Shumaker, H. Dennis

Correspondence: Please do not favor cattle grazing to the detriment of the Tule Elk at Point Reyes.

- Wildlife and natural scenery are the primary reason I & my family visit National Monuments & National Parks. • Point Reyes National Seashore is supposed to be managed under the Point Reyes Act for "maximum protection, restoration, and preservation of the natural environment." The NPS has no mandate for prioritizing commercial agricultural leases on these public lands.

- The natural beauty of a National Monument or Park and the health & welfare of its native wildlife must take priority in NPS planning over any commercial activities at Point Reyes. • Tule elk are an important part of the landscape at Point Reyes. Their recovery is a direct result of the successful native ecosystem restoration by the NPS, which is a key element of the its Congressionally mandated mission. It has taken a lot of time, money and effort to restore tule elk to Point Reyes, the only national park where they live. Tule elk must continue to roam free and forage in the park - not shot, removed, fenced or treated as problem animals. The only problem here is cattle. • Right now the Point Reyes ranches enjoy not only subsidized grazing fees and housing, but also taxpayer-funded infrastructure and road improvements, and publicly funded projects. But commercial activities at Point Reyes must be required to accommodate native wildlife - not the other way around. • The NPS should never allow any new agricultural activities at Point Reyes. Planting artichokes or other row crops will attract birds. And introducing sheep, goats, pigs or chickens will attract native predators such as coyotes, bobcats and foxes. Expanded ranching would only create new wildlife conflicts. • Cattle ranching should only be allowed at Point Reyes if it's consistent with preserving the natural environment. And agricultural activities such as mowing must never be allowed in park areas where they harm endangered species or wildlife habitat, impair water quality, cause excessive erosion or spread invasive plants/diseases. • Cattle are the seashore's primary source of greenhouse gases. So the Park Service's preferred alternative is inconsistent with its own "Climate Friendly Parks" plan.

#6116

Name: Gillette, Dan

Correspondence: I'm writing to support the public access and bicycling improvements for Pt. Reyes, outlined under Alternatives B, C, D, E, and F. I strongly support proposals that would lead to the planning and

implementation of bicycling routes on trails, ranch roads, and pathways throughout the planning area, including but not limited to: 1) a connection between Devil's Gulch and Platform Bridge Road using existing ranch roads, 2) a connection between Bolinas Ridge Trail at Olema Hill and Point Reyes Station to serve as an interim connection for the Cross Marin Trail, 3) a connection between Bolinas Ridge Trail and Five Brooks Stables using existing ranch roads 4) a connection between Drakes Estero and Abbotts Lagoon Trail using existing ranch roads, 5) a connection between Marshall Beach Trailhead and Pierce Point Road using existing ranch roads, and 6) an Estero Trail loop using existing ranch roads. I encourage NPS to collaborate with ranchers and other stakeholders to educate the public and address concerns related to public access on working ranch lands.

The improvements outlined above would enable and encourage me to visit the Seashore more regularly-and by bike, rather than car. I would feel much safer riding in the Seashore and surrounding areas on trails, pathways, and ranch roads, rather than on roads shared with fast-moving vehicular traffic. Bicycling opportunities are currently very limited and fragmented, so any improvements in connectivity and the creation of new loop options would enable me to enjoy more of the Seashore and surrounding areas by bike.

#6117

Name: Tigerlily, Eliot

Correspondence: Ranchers should never take priority in our parks. Wildlife and endangered wildlife needs these spaces to survive and thrive. Stop managing our public lands for corporate profits and protect them for the people and the planet.

#6118

Name: Pfeffer, Martin

Correspondence: I am writing to urge the National Park Service to discontinue the grazing of beef and dairy cattle at Point Reyes National Seashore. This precious area has been damaged by livestock grazing which poses a threat to the environment and local wildlife and it should be protected and used to serve the public good, and not for the benefit of the livestock industry.

I strongly oppose Option B and any other proposal that would be fatal to Tule Elk or other wildlife to the benefit of ranching operations, and encourage the agency to adopt Option F to discontinue grazing and allow members of the public to enjoy this beautiful park and to be enriched with opportunities to visit and appreciate this special place.

#6119

Name: Polick, Jeffrey

Correspondence: Please Record My Comments as follow: I am a Taxpayer of Marin County for the past 25 years. I am very familiar with this beautiful area And Ask that it Remains WILD for the Elk and all wild animals. I do NOT want any more cows/cattle Grazing in Our Pt. Reyes area. Its a land grab that is Unacceptable! No Killing of the Elk that are In or Residents in this area and NO Transfer to "Indian Land" as Mr. Huffman recently discussed. NO! WE want Our tax \$\$\$\$ to PROTECT this pristine area - - NOT have it be a dirty, Agricultural area with cows and cow dung going into our ocean - NO! PROTECT the roaming ELK there and again NO Transfer of any of the Elk to a different area - THAT is a waste of \$\$ and NOT Fair to Our beautiful ELK and All of the wild life.

#6120

Name: D, Lll

Correspondence: To Whom It May Concern... Please protect Point Reyes from the livestock industry. To be blessed with such natural beauty as Point Reyes National park area.... as good stewards of this land.... we need to keep it clean, pristine and wild.The animal agricultural industry should not be allowed to graze cattle across protected lands. Other animals, such as the Tule Elk, should not be destroyed in order to promote cattle grazing



and slaughter for the meat industry. Please protect Point Reyes Please protect the Elk on this land Please keep Point Reyes National park lands wild, clean and protected habitats Thank You, Ms LD

#6121

Name: Brewer, Anna

Correspondence: I object! For "maximum protection, restoration, and preservation of the natural environment" , Point Reyes National Seashore has to be managed under the Point Reyes Act! grazing is a private enterprise, what right do these ranchers have to put their cattle out in this protected natural area! This is unheard of and outright ILLEGAL! We want native wildlife protected at Point Reyes and Tule elk are an important part of this landscape now that they have recovered. No way to have them killed or fenced in again, this is truly contrary to the original plans. leave them be, and let them live without any disturbances from 2 legged invaders with their to be slaughtered cattle which does not belong here!

#6122

Name: Khalsa, Arjan

Correspondence: I ride my road bike from my San Rafael home to Point Reyes once a week. I wish there were bike trails within the park. My total ride is usually around 50 miles. When I arrive in the park, usually entering from the Olema hill and turning towards Bear Valley, I need to adjust to poor road conditions and limited shoulder space on the roads. Samuel P Taylor has better road conditions now and also has a bike path. Pt. Reyes generally has neither.

When I ride out towards Inverness and the northern beaches, the road conditions are terrible. Terrible. That said, Abbots Lagoon, Kehoe Beach, McClures Beach, and the Pierce Point areas are precious. I wish there was better bike access.

To me, the Bear Valley Visitors Center area is the heart of the park. I have taken school children (I used to teach), family, colleagues, and friends to this area for 40 years. I have seen fox, osprey, and white deer, along with countless other birds, mammals, and reptiles. I love the acorn woodpeckers right in the picnic area. But bike access is poor. Wouldn't it be great if family's could safely ride into Bear Valley and then onto the Miwok Village, and more easily make their way to Arch Rock?

I have visited Point Reyes National Seashore on a regular basis since the 1970's. I must have entered the park close to 750 times in my adult life and have visited most every portion of park. Our family moved to San Rafael in 1994 in large part because of our desire to visit Point Reyes often. We are avid hikers, bikers, bird-watchers, and nature lovers.

#6123

Name: Gaztanaga, Susan

Correspondence: Whatever you do, please continue to protect the habitat of the Tule elk population.

#6124

Name: Sobo, Naomi

Correspondence: We need to preserve Pt. Reyes in it's natural state. Cattle will destroy the environment and put a further burden on our atmosphere by emitting greenhouse gasses which contribute to climate change.

#6125

Name: Turner, Gabrielle

Correspondence: I am writing to urge the National Park Service to discontinue the grazing of beef and dairy cattle

at Point Reyes National Seashore. This precious area has been damaged by livestock grazing which poses a threat to the environment and local wildlife and it should be protected and used to serve the public good, and not for the benefit of the livestock industry.

I strongly oppose Option B and any other proposal that would be fatal to Tule Elk or other wildlife to the benefit of ranching operations, and encourage the agency to adopt Option F to discontinue grazing and allow members of the public to enjoy this beautiful park and to be enriched with opportunities to visit and appreciate this special place.

#6126

Name: Lawson, Carol

Correspondence: Dear NPS why can't you let these beautiful Tule elk live like they always have and not try to treat them like livestock. We always enjoy seeing them when we visit the Pt. Reyes lighthouse. Nature will thin the herd. Protect the Tule elk.

#6127

Name: Gee, Megan

Correspondence: I'm writing to support the public access and bicycling improvements outlined under Alternatives B, C, D, E, and F. I strongly support proposals that would lead to the planning and implementation of bicycling routes on trails, ranch roads, and pathways throughout the planning area, including but not limited to: 1) a connection between Devil's Gulch and Platform Bridge Road using existing ranch roads, 2) a connection between Bolinas Ridge Trail at Olema Hill and Point Reyes Station to serve as an interim connection for the Cross Marin Trail, 3) a connection between Bolinas Ridge Trail and Five Brooks Stables using existing ranch roads 4) a connection between Drakes Estero and Abbotts Lagoon Trail using existing ranch roads, 5) a connection between Marshall Beach Trailhead and Pierce Point Road using existing ranch roads, and 6) an Estero Trail loop using existing ranch roads. I encourage NPS to collaborate with ranchers and other stakeholders to educate the public and address concerns related to public access on working ranch lands.

The improvements outlined above would enable and encourage me to visit the Seashore more regularly-and by bike, rather than car. I would feel much safer riding in the Seashore and surrounding areas on trails, pathways, and ranch roads, rather than on roads shared with fast-moving vehicular traffic. Bicycling opportunities are currently very limited and fragmented, so any improvements in connectivity and the creation of new loop options would enable me to enjoy more of the Seashore and surrounding areas by bike.

#6128

Name: Trunzo, Adrian

Correspondence: National Parks are for the use and enjoyment of the general public, not private industries! Why do we continue to subsidize ranching and agriculture on public lands when the only benefits are for those private industries? I have been to Point Reyes many times and loved seeing the elk on the coastal prairie. Expanded ranching and agriculture can only help degrade that environment, the very environment the National Seashore was meant to protect. Moreover, a management plan that includes killing a native species, elk, in favor of an invasive one, cows, seems completely contrary to the goals of national protected area.

In short, I do not agree with replacing conservation with cows and agriculture. Point Reyes National Seashore should not become Point Reyes National Cow and Farm Land.

#6129

Name: rinne, fred

Correspondence: Commercial activities must be required to accommodate the needs of native plants and wildlife not the other way around.

#6130

Name: Dmitriev-Odier, Ludmila

Correspondence: excellent initiative!!!

#6131

Name: Seltzer, Shaiyel

Correspondence: To add to my letter: I choose Alternative "F." I am grateful that you are willing to give all Tule Elks their - Home back. They will be able to intermingle, and interbreeding, hence diseases will stop. There is other land for cattle, but not for the Tule Elk, especially the Drakes Beach Elk.

Dear National Parks Service, I am for Tule Elk to live since the dawning of their existence. As you know, but is worth a review, according to California Department of Fish and Wildlife, there are only approximately 5,700 Tule Elk today, while back in 1800, there were approximately 500,000 living in California, still - their only home. By 1870, only a few pair of Tule Elks were alive, but most believed that they were completely hunted to extinction. The protected status of Tule Elks still have not achieved their collective true herd status. According to The Sacramento Bee, at the end of 2018, Drakes Beach herd is comprised of only 124 Tule Elks, and in total 21 herds totaling 3,800 (so I don't know which is correct). Tule Elks are not only to be saved from death, but should be given the land their home as in year 1800. The Tule Elk (*Cervus canadensis nannodes*), the Flagship species for the California Floristic Province, one of the world's 25 biodiversity hotspots and most endangered Eco regions in North America need to continue to have their own space - their own home in order to connect with other Tule Elks for "managing" them is leading to inbreeding, which can have diseases. It is not about "deserve," but the right to - live. Cattle are considered invasive species, no matter what kind. So, especially when Tule Elk are listed as a protective species, I am alarmed and shocked that there is any question to not only end the killings of Tule Elk, but to find new places for the cattle to be, that actually may be better for the cattle in the first place. Please end the killings of Tule Elk, and focus on relocating the cattle, who again, are invasive species to there part of California, and were never meant to live together in the first place.

Sincerely, Shaiyel Seltzer

#6132

Name: Sudlow , David

Correspondence: I'm writing to support the public access and bicycling improvements outlined under Alternatives B, C, D, E, and F. I strongly support proposals that would lead to the planning and implementation of bicycling routes on trails, ranch roads, and pathways throughout the planning area, including but not limited to: 1) a connection between Devil's Gulch and Platform Bridge Road using existing ranch roads, 2) a connection between Bolinas Ridge Trail at Olema Hill and Point Reyes Station to serve as an interim connection for the Cross Marin Trail, 3) a connection between Bolinas Ridge Trail and Five Brooks Stables using existing ranch roads 4) a connection between Drakes Estero and Abbotts Lagoon Trail using existing ranch roads, 5) a connection between Marshall Beach Trailhead and Pierce Point Road using existing ranch roads, and 6) an Estero Trail loop using existing ranch roads. I encourage NPS to collaborate with ranchers and other stakeholders to educate the public and address concerns related to public access on working ranch lands.

The improvements outlined above would enable and encourage me to visit the Seashore more regularly-and by bike, rather than car. I would feel much safer riding in the Seashore and surrounding areas on trails, pathways, and ranch roads, rather than on roads shared with fast-moving vehicular traffic. Bicycling opportunities are currently very limited and fragmented, so any improvements in connectivity and the creation of new loop options would enable me to enjoy more of the Seashore and surrounding areas by bike.

#6133

Name: N/A, N/A

Correspondence: I am writing to urge the National Park Service to discontinue the grazing of beef and dairy cattle at Point Reyes National Seashore. This precious area has been damaged by livestock grazing which poses a threat to the environment and local wildlife and it should be protected and used to serve the public good, and not for the benefit of the livestock industry.

I strongly oppose Option B and any other proposal that would be fatal to Tule Elk or other wildlife to the benefit of ranching operations, and encourage the agency to adopt Option F to discontinue grazing and allow members of the public to enjoy this beautiful park and to be enriched with opportunities to visit and appreciate this special place.

As a frequent consumer of grass-fed beef, free-range meats etc, I regularly support local businesses such as those ranching in Point Reyes. However I strongly believe the tule elk have eminent domain so to speak. They were here first, and we need to make every effort to return open space to as wild a condition as possible, as a bulwark against the rapid disappearance of species due to human activity. Ranchers can ranch elsewhere in Marin and Sonoma counties- -let the tule elk have Point Reyes back. Please adopt Option F- -thank you!

#6134

Name: N/A, N/A

Correspondence: I'm writing to support the public access and bicycling improvements outlined under Alternatives B, C, D, E, and F. I strongly support proposals that would lead to the planning and implementation of bicycling routes on trails, ranch roads, and pathways throughout the planning area, including but not limited to: 1) a connection between Devil's Gulch and Platform Bridge Road using existing ranch roads, 2) a connection between Bolinas Ridge Trail at Olema Hill and Point Reyes Station to serve as an interim connection for the Cross Marin Trail, 3) a connection between Bolinas Ridge Trail and Five Brooks Stables using existing ranch roads 4) a connection between Drakes Estero and Abbotts Lagoon Trail using existing ranch roads, 5) a connection between Marshall Beach Trailhead and Pierce Point Road using existing ranch roads, and 6) an Estero Trail loop using existing ranch roads. I encourage NPS to collaborate with ranchers and other stakeholders to educate the public and address concerns related to public access on working ranch lands.

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#6135

Name: Foster, Andrew

Correspondence: Hello, I am a Marin resident (Corte Madera). I would like to visit the Point Reyes seashore area more often, but I also use cars as little as possible, and would like to travel by bike. However, I do not do so now because existing routes are too dangerous for bikers - - I would prefer a "gravel" route that is not open to cars.

I'm writing to support the public access and bicycling improvements outlined under Alternatives B, C, D, E, and F. I strongly support proposals that would lead to the planning and implementation of bicycling routes on trails, ranch roads, and pathways throughout the planning area, including but not limited to: 1) a connection between Devil's Gulch and Platform Bridge Road using existing ranch roads, 2) a connection between Bolinas Ridge Trail at Olema Hill and Point Reyes Station to serve as an interim connection for the Cross Marin Trail, 3) a connection between Bolinas Ridge Trail and Five Brooks Stables using existing ranch roads 4) a connection between Drakes Estero and Abbotts Lagoon Trail using existing ranch roads, 5) a connection between Marshall Beach Trailhead

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#6136

Name: Ardell, Jon

Correspondence: I'm writing to support the public access and bicycling improvements outlined under Alternatives B, C, D, E, and F. I strongly support proposals that would lead to the planning and implementation of bicycling routes on trails, ranch roads, and pathways throughout the planning area, including but not limited to: 1) a connection between Devil's Gulch and Platform Bridge Road using existing ranch roads, 2) a connection between Bolinas Ridge Trail at Olema Hill and Point Reyes Station to serve as an interim connection for the Cross Marin Trail, 3) a connection between Bolinas Ridge Trail and Five Brooks Stables using existing ranch roads 4) a connection between Drakes Estero and Abbotts Lagoon Trail using existing ranch roads, 5) a connection between Marshall Beach Trailhead and Pierce Point Road using existing ranch roads, and 6) an Estero Trail loop using existing ranch roads. I encourage NPS to collaborate with ranchers and other stakeholders to educate the public and address concerns related to public access on working ranch lands.

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#6137

Name: N/A, Brian

Correspondence: I'm writing to support the public access and bicycling improvements outlined under Alternatives B, C, D, E, and F. I strongly support proposals that would lead to the planning and implementation of bicycling routes on trails, ranch roads, and pathways throughout the planning area, including but not limited to: 1) a connection between Devil's Gulch and Platform Bridge Road using existing ranch roads, 2) a connection between Bolinas Ridge Trail at Olema Hill and Point Reyes Station to serve as an interim connection for the Cross Marin Trail, 3) a connection between Bolinas Ridge Trail and Five Brooks Stables using existing ranch roads 4) a connection between Drakes Estero and Abbotts Lagoon Trail using existing ranch roads, 5) a connection between Marshall Beach Trailhead and Pierce Point Road using existing ranch roads, and 6) an Estero Trail loop using existing ranch roads. I encourage NPS to collaborate with ranchers and other stakeholders to educate the public and address concerns related to public access on working ranch lands.

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#6138

Name: Williams, Rebecca

Correspondence: I am writing to urge the National Park Service to discontinue the grazing of beef and dairy cattle at Point Reyes National Seashore. This precious area has been damaged by livestock grazing which poses a threat to the environment and local wildlife and it should be protected and used to serve the public good, and not for the benefit of the livestock industry.

I strongly oppose Option B and any other proposal that would be fatal to Tule Elk or other wildlife to the benefit of ranching operations, and encourage the agency to adopt Option F to discontinue grazing and allow members of the public to enjoy this beautiful park and to be enriched with opportunities to visit and appreciate this special place.

#6139

Name: Smith, Yvonne

Correspondence: I am writing to urge the National Park Service to discontinue grazing beef and dairy cattle at Point Reyes National Seashore. This precious area has been damaged by livestock grazing that poses a threat to the environment and local wildlife. The land should be protected and used to serve the public good and not solely to benefit the livestock industry.

I strongly oppose Option B and any other proposal that would be fatal to Tule Elk or other wildlife for the benefit of ranching operations. I encourage the National Park Service to adopt Option F to discontinue grazing and, instead, allow members of the public to enjoy this beautiful park and to be enriched with opportunities to visit and appreciate this special place.

Thank you for your care, concern, and consideration of this important issue.

#6140

Name: Thompson, Lawrence

Correspondence: When I visit Point Reyes, I want a nature experience. I don't want to see cattle, which are a major contributor to global warming. The Park Service's preferred alternative is INCONSISTENT with its own "Climate Friendly Parks" plan. Agricultural activities such as mowing shouldn't be allowed in park areas where they harm endangered species or wildlife habitat, impair water quality, cause excessive erosion or spread invasive plants/diseases. Mowing should be minimized because it contributes to global warming from fossil fuel use. No new agricultural activities should be allowed.

Tule elk are an enjoyable part of the landscape; their recovery is a result of successful native ecosystem restoration, which is a key element of the Park Service's mission. This is the only national park where they live, so they should be allowed to roam free and forage in the park, not bothered in any way.

#6141

Name: Esteve, Gregory

Correspondence: Tule elk are an important part of the landscape at Point Reyes. Their recovery is a result of successful native ecosystem restoration, which is a key element of the Park Service's mission. It's taken time, money and effort to restore tule elk to Point Reyes, the only national park where they live. Tule elk should be allowed to roam free and forage in the park - not shot, removed, fenced or treated as problem animals.

Cattle ranching should only be allowed if it's consistent with preserving the natural environment. And agricultural activities such as mowing shouldn't be allowed in park areas where they harm endangered species or wildlife habitat, impair water quality, cause excessive erosion or spread invasive plants/diseases. Commercial activities at Point Reyes should be required to accommodate native wildlife - not the other way around.

Cattle are the seashore's primary source of greenhouse gases. So the Park Service's preferred alternative is inconsistent with its own "Climate Friendly Parks" plan.

Point Reyes National Seashore is supposed to be managed under the Point Reyes Act for "maximum protection, restoration, and preservation of the natural environment." Natural values, native wildlife, public access and enjoyment should take priority over commercial activities at Point Reyes. There's no mandate for prioritizing commercial agricultural leases on these public lands.

#6142

Name: Lea, Susan

Correspondence: Hello, for more than 50 years I have headed out to Pt. Reyes and enjoyed the seashore and running paths. I personally observed cattle ranching in balance with the Tule Elk, so I wonder how it got to a place where there is an imbalance and lack of harmony? For 40 years, I heard of NO problems, so what is going on that has changed??? What are the optimum numbers for the elk and for the cattle that work so both can share this habitat? Please provide us with the studies and reports from which you are making your decisions. Of course, Tule Elk were present before cattle, but cattle make it possible for the ranchers to remain on the land, and we'd rather have ranchers than commercial resorts.

#6143

Name: Lowry, Marsha

Correspondence: The Point Reyes National Seashore is supposed to be managed under the Point Reyes Act for "maximum protection, restoration, and preservation of the natural environment." To use the lands for commercial agricultural uses is not what the area is supposed to be used for. It took a lot of hard work to reestablish the Tule elk in the area and are an important part of the landscape at Point Reyes. They are the natives, and should NOT have to justify their existence there. NOT treated as a pest. Agricultural grazing should only be allowed to keep Non native grasses & weeds in "check" Please consider the ramifications of these actions on the natural wildlife of the area, which you are entrusted to protect for ALL the community/public. Thank you for considering my views... Marsha Lowry

#6144

Name: Pierce, Nuri

Correspondence: Dear Sirs,

I see with alarm that our wild lands still insisting in giving priority to ranchers even if they sold their rights for their cattle to forage at Point Reyes to the people of America years ago.

It is time to face the fact that we are losing biodiversity at an alarming scale and cattle or sheep will not protect us from a future of diminishing returns and impoverished environment. As a botanist I have seen first hand the damages from cattle and the need for wild areas to safeguard our future. As I understand it has taken many years to restore the elk to the area, and they should be allowed to behave as wild animals that they are and not pursued and eliminated for getting in the way of business. No mowing, crops or alteration of the landscape should be allowed.

Businesses are the reasons why we are losing our natural world and we are in the situation we are today. It is the small decisions, keeping places wild at the local level that will permit the situation to improve. People want their businesses to survive and if they get more and more advantages there will be more and more people every time asking for more and more until there is not more wild left.

Please respect the Parks mission and support a natural environment, safeguarding the land for future generations. Thank you

#6145

Name: N/A, N/A

Correspondence: I am writing to urge the National Park Service to discontinue the grazing of beef and dairy cattle at Point Reyes National Seashore. This precious area has been damaged by livestock grazing which poses a threat to the environment and local wildlife and it should be protected and used to serve the public good, and not for the benefit of the livestock industry.

I strongly oppose Option B and any other proposal that would be fatal to Tule Elk or other wildlife to the benefit of ranching operations, and encourage the agency to adopt Option F to discontinue grazing and allow members of the public to enjoy this beautiful park and to be enriched with opportunities to visit and appreciate this special place.

#6146

Name: Tilmans, Nicolas

Correspondence: I'm a long time resident of the bay area and ride in Marin all the time. I love the Point Reyes area and would love to enjoy the spectacular views on my mountain bike. Expanded access can be done responsibly and won't harm the area if done right while getting more people outdoors in our magnificent public lands.

#6147

Name: Marker, Anne

Correspondence: I am writing to urge the National Park Service to discontinue the grazing of beef and dairy cattle at Point Reyes National Seashore. This precious area has been damaged by livestock grazing which poses a threat to the environment and local wildlife and it should be protected and used to serve the public good, and not for the benefit of the livestock industry.

I strongly oppose Option B and any other proposal that would be fatal to Tule Elk or other wildlife to the benefit of ranching operations, and encourage the agency to adopt Option F to discontinue grazing and allow members of the public to enjoy this beautiful park and to be enriched with opportunities to visit and appreciate this special place.

#6148

Name: Dean, Kathleen

Correspondence: I am writing to urge the National Park Service to discontinue the grazing of beef and dairy cattle at Point Reyes National Seashore. This precious area has been damaged by livestock grazing which poses a threat to the environment and local wildlife and it should be protected and used to serve the public good, and not for the benefit of the livestock industry.

I strongly oppose Option B and any other proposal that would be fatal to Tule Elk or other wildlife to the benefit of ranching operations, and encourage the agency to adopt Option F to discontinue grazing and allow members of the public to enjoy this beautiful park and to be enriched with opportunities to visit and appreciate this special place.

The Tule Elk cannot speak for themselves but I and others speak for them!

The livestock industry is harming our environment and definitely needs to be discontinued in its use of Point Reyes National Seashore.



Thank you for your attention to this.

#6149

Name: Davis, Angelique

Correspondence: I just visited Point Reyes two weeks ago and hiked through the early morning mist watching the Tule elk and listening to their bugles. They are beautiful, majestic and a large part of what makes this area so magical. It would be devastating to witness their loss merely for the sake of profit. We are moving beyond this way of thinking and California should lead the way in preserving life.

#6150

Name: N/A, Sue

Correspondence: Please do not kill wild animals for cattle ranching interests. Cattle are not native species. We should be reducing the impact of cattle instead of expanding it. Please do not use my tax dollars to do the bidding of the cattlemen's lobbyists and industry interests.

#6151

Name: Soldera, Barbara

Correspondence: I am writing to urge the National Park Service to discontinue the grazing of beef and dairy cattle at Point Reyes National Seashore. This precious area has been damaged by livestock grazing which poses a threat to the environment and local wildlife and it should be protected and used to serve the public good, and not for the benefit of the livestock industry.

I STRONGLY OPPOSE Option B and any other proposal that would be fatal to Tule Elk or other wildlife to the benefit of ranching operations, and encourage the agency to adopt Option F to discontinue grazing and allow members of the public to enjoy this beautiful park and to be enriched with opportunities to visit and appreciate this special place.

It would be a (preventable) tragedy to lose the Tule Elk. Please KEEP THE OPEN SPACE OPEN FOR NATURE  
Thank you

#6152

Name: Lyons, Donna

Correspondence: I am writing to urge the National Park Service to discontinue the grazing of beef and dairy cattle at Point Reyes National Seashore. This precious area has been damaged by livestock grazing which poses a threat to the environment and local wildlife and it should be protected and used to serve the public good, and not for the benefit of the livestock industry.

I strongly oppose Option B and any other proposal that would be fatal to Tule Elk or other wildlife to the benefit of ranching operations, and encourage the agency to adopt Option F to discontinue grazing and allow members of the public to enjoy this beautiful park and to be enriched with opportunities to visit and appreciate this special place.

We must move away from the use of animals for food. It is destroying our health and our planet. More than that, it is just wrong to kill animals for food, or for any reason. They deserve to live their whole lives, in peace, without fear or abuse. The animal agriculture business is a vile one, mainly for how it treats animals. Despicably. We must move towards a plant based approach to eating. If not, our world cannot be saved. I know that you know this. Please do the right thing and oppose Option B.

Thank you.

#6153

Name: Jones, Jerry

Correspondence: I am writing to urge the National Park Service to discontinue the grazing of beef and dairy cattle at Point Reyes National Seashore. This precious area has been damaged by livestock grazing which poses a threat to the environment and local wildlife and it should be protected and used to serve the public good, and not for the benefit of the livestock industry.

I strongly oppose Option B and any other proposal that would be fatal to Tule Elk or other wildlife to the benefit of ranching operations, and encourage the agency to adopt Option F to discontinue grazing and allow members of the public to enjoy this beautiful park and to be enriched with opportunities to visit and appreciate this special place.

#6154

Name: Cleeves, James

Correspondence: Oyster farmers were judged to be inconsistent with the National park and were removed. Precedent has been established. In the 60's the ranchers were judged inconsistent with the National Park and were paid to move. It is past time that they actually follow through on what they were paid to do. It is past time for the NPS to follow through on the directives to remove the cattle ranches.

#6155

Name: van der wal, susan & john

Correspondence: After careful consideration of all the alternatives, we support Alternative C.

There is a severe impact by the elk to the dairy cows/beef cattle grazing on the ranch lands competing for food and water (plus the added risk of Johne's disease). Fencing has been destroyed by the elk at great cost to the ranchers. Ranching is hard work, long hours, and does not make a lot of money. The arrival of the elk on the grazing lands has caused enormous stress and financial loss for the Pt. Reyes National Seashore ranches.

We support the 20-year leases and they should have been implemented shortly after Salazar's visits in 2012. This is crucial for the ranchers' planning financially.

You talk about the "Drakes Beach herd" of 120. I assume this includes the Estero bull herds seen from the trail in groups of 4, 9, & 12 in a wide area in the hills and by the old ranch road looking far south. We have seen as many as 36 bulls above the Estero. Also, there have been up to 10 bulls on the Mendoza ranch's west side. There are way too many bulls.

Susan and John Van Der Wal

#6156

Name: Engle, Theresa

Correspondence: I am writing to urge the National Park Service to discontinue the grazing of beef and dairy cattle at Point Reyes National Seashore. This precious area has been damaged by livestock grazing which poses a threat to the environment and local wildlife and it should be protected and used to serve the public good, and not for the benefit of the livestock industry.

I strongly oppose Option B and any other proposal that would be fatal to Tule Elk or other wildlife to the benefit of ranching operations, and encourage the agency to adopt Option F to discontinue grazing and allow members of

the public to enjoy this beautiful park and to be enriched with opportunities to visit and appreciate this special place.

#6157

Name: Kramer, Matthew

Correspondence: Greetings, I ride bicycles on the roads and trails of Marin County, where I live with my wife and two elementary-school-aged children. My family also enjoys all sorts of bicycling, yet we seldom ride to or within Pt. Reyes National Seashore, because of poor connectivity of routes and because, especially with children involved, pedaling there alongside high-speed traffic does not feel safe.

I'm writing to voice my support for the improvements in bicycle and public access that are outlined under Alternatives B, C, D, E and F. Specifically, I am in favor of the following plan elements and trail connections:

- Collaboration with ranchers and other stakeholders to educate the public and address concerns related to public access on working ranch lands
- A connection between Devil's Gulch and Platform Bridge Road using existing ranch roads
- A connection between the Bolinas Ridge Trail at Olema Hill and Point Reyes Station to serve as an interim connection for the Cross Marin Trail
- A connection between Bolinas Ridge Trail and Five Brooks Stables using existing ranch roads
- A connection between Drakes Estero and Abbotts Lagoon Trail using existing ranch roads
- A connection between the Marshall Beach Trailhead and Pierce Point Road using existing ranch roads
- An Estero Trail loop using existing ranch roads

These improvements would make it much safer and more feasible for my family to travel by bicycle to and within Pt. Reyes National Seashore.

#6158

Name: Lafaver, Barbara

Correspondence: I am writing to urge the National Park Service to discontinue the grazing of beef and dairy cattle at Point Reyes National Seashore. This precious area has been damaged by livestock grazing which poses a threat to the environment and local wildlife and it should be protected and used to serve the public good, and not for the benefit of the livestock industry.

I strongly oppose Option B and any other proposal that would be fatal to Tule Elk or other wildlife to the benefit of ranching operations, and encourage the agency to adopt Option F to discontinue grazing and allow members of the public to enjoy this beautiful park and to be enriched with opportunities to visit and appreciate this special place.

#6159

Name: Isaac , Marian

Correspondence: Cattle grazing at Point Reyes??? Government agencies protecting the beef industry instead of a beautiful, unique part of our environment???

This has to stop.

#6160

Name: Lowrey, Paul

Correspondence: I am writing to urge the National Park Service to discontinue the grazing of beef and dairy cattle at Point Reyes National Seashore. This precious area has been damaged by livestock grazing which poses a threat to the environment and local wildlife and it should be protected and used to serve the public good, and not for the benefit of the livestock industry.

I strongly oppose Option B and any other proposal that would be fatal to Tule Elk or other wildlife to the benefit of ranching operations, and encourage the agency to adopt Option F to discontinue grazing and allow members of the public to enjoy this beautiful park and to be enriched with opportunities to visit and appreciate this special place.

#6161

Name: Beddow, Kristan

Correspondence: I am writing to urge the National Park Service to discontinue the grazing of beef and dairy cattle at Point Reyes National Seashore. This precious area has been damaged by livestock grazing which poses a threat to the environment and local wildlife and it should be protected and used to serve the public good, and not for the benefit of the livestock industry.

I strongly oppose Option B and any other proposal that would be fatal to Tule Elk or other wildlife to the benefit of ranching operations, and encourage the agency to adopt Option F to discontinue grazing and allow members of the public to enjoy this beautiful park and to be enriched with opportunities to visit and appreciate this special place.

Thank you for your consideration to the natural environment we must protect from human destruction. Kind Regards, Kristan Beddow

#6162

Name: jenkins, heide

Correspondence: Stop before California becomes an agricultural state like TEXAS with dead zones in our ocean waters, toxic algae blooms, and a major contributor to unbearable climate change.

#6163

Name: Kern, Casey

Correspondence: I strongly OPPOSE the National Park Service's proposal to continue livestock grazing within the Point Reyes National Seashore and North District Golden Gate National Recreation Area. I support Alternative F that would discontinue ranching operations and visitor opportunities would be expanded.

The Park Service confines the tule elk to under 3,000 acres of the 28,000-acre park, while allowing beef and dairy ranching to use more than one-third of the park. It's time our federal government stop propping up and using tax dollars to subsidize animal agriculture on PUBLIC lands.

Alternative F will serve the greatest number of Americans - - the vast majority of Americans want to visit a pristine Point Reyes National Seashore, not a park littered with animal agriculture. Animal agriculture or ranching is not a cultural resource - - rather it is an industry that has destroyed vast swaths of public and private lands, destroyed riparian areas and rangeland health, contributes to the climate crisis and causes immeasurable suffering to the animals exploited and killed.

Thank you! Casey Kern California Resident & National Park Enthusiast

#6164

Name: Curtis, Chris

Correspondence: Please don't permit livestock grazing at Point Reyes National Park. Beyond the negative effects on wildlife and the landscape, we should not be encouraging the devastating environmental impact that animal agriculture makes, especially in regard to the climate crisis.

#6165

Name: Kite, Richard

Correspondence: Discuss how wildlife and natural scenery motivate you to visit Point Reyes and other national parks. Point Reyes National Seashore is supposed to be managed under the Point Reyes Act for "maximum protection, restoration, and preservation of the natural environment." There's no mandate for prioritizing commercial agricultural leases on these public lands. Natural values, native wildlife, public access and enjoyment should take priority over commercial activities at Point Reyes. Tule elk are an important part of the landscape at Point Reyes. Their recovery is a result of successful native ecosystem restoration, which is a key element of the Park Service's mission. It's taken a lot of time, money and effort to restore tule elk to Point Reyes, the only national park where they live. Tule elk should be allowed to roam free and forage in the park - not shot, removed, fenced or treated as problem animals. Right now the Point Reyes ranches enjoy not only subsidized grazing fees and housing, but also taxpayer-funded infrastructure and road improvements, and publicly funded projects. But commercial activities at Point Reyes should be required to accommodate native wildlife - not the other way around. The Park Service shouldn't allow any new agricultural activities at Point Reyes. Planting artichokes or other row crops will attract birds. And introducing sheep, goats, pigs or chickens will attract native predators such as coyotes, bobcats and foxes. Expanded ranching would only create new wildlife conflicts. Cattle ranching should only be allowed if it's consistent with preserving the natural environment. And agricultural activities such as mowing shouldn't be allowed in park areas where they harm endangered species or wildlife habitat, impair water quality, cause excessive erosion or spread invasive plants/diseases. Cattle are the seashore's primary source of greenhouse gases. So the Park Service's preferred alternative is inconsistent with its own "Climate Friendly Parks" plan

#6166

Name: London, Diane

Correspondence: Animals and environment are more important than ranchers and farmers for profit

#6167

Name: Evans, Bronwen

Correspondence: Discuss how wildlife and natural scenery motivate you to visit Point Reyes and other national parks. Point Reyes National Seashore is supposed to be managed under the Point Reyes Act for "maximum protection, restoration, and preservation of the natural environment." There's no mandate for prioritizing commercial agricultural leases on these public lands. Natural values, native wildlife, public access and enjoyment should take priority over commercial activities at Point Reyes. Tule elk are an important part of the landscape at Point Reyes. Their recovery is a result of successful native ecosystem restoration, which is a key element of the Park Service's mission. It's taken a lot of time, money and effort to restore tule elk to Point Reyes, the only national park where they live. Tule elk should be allowed to roam free and forage in the park - not shot, removed, fenced or treated as problem animals. Right now the Point Reyes ranches enjoy not only subsidized grazing fees and housing, but also taxpayer-funded infrastructure and road improvements, and publicly funded projects. But commercial activities at Point Reyes should be required to accommodate native wildlife - not the other way around. The Park Service shouldn't allow any new agricultural activities at Point Reyes. Planting artichokes or other row crops will attract birds. And introducing sheep, goats, pigs or chickens will attract native predators such

as coyotes, bobcats and foxes. Expanded ranching would only create new wildlife conflicts. Cattle ranching should only be allowed if it's consistent with preserving the natural environment. And agricultural activities such as mowing shouldn't be allowed in park areas where they harm endangered species or wildlife habitat, impair water quality, cause excessive erosion or spread invasive plants/diseases. Cattle are the seashore's primary source of greenhouse gases. So the Park Service's preferred alternative is inconsistent with its own "Climate Friendly Parks" plan.

#6168

Name: N/A, N/A

Correspondence: Please protect the native wild life in Point Reyes National Seashore. The animal agriculture industry should not take precedence in the management of land at the cost of degrading natural habitats.

#6169

Name: Rawlings, Alex

Correspondence: I am writing to urge the National Park Service to discontinue the grazing of beef and dairy cattle at Point Reyes National Seashore. This precious area has been damaged by livestock grazing which poses a threat to the environment and local wildlife and it should be protected and used to serve the public good, and not for the benefit of the livestock industry.

I strongly oppose Option B and any other proposal that would be fatal to Tule Elk or other wildlife to the benefit of ranching operations, and encourage the agency to adopt Option F to discontinue grazing and allow members of the public to enjoy this beautiful park and to be enriched with opportunities to visit and appreciate this special place.

#6170

Name: N/A, N/A

Correspondence: I'm writing to support bicycling and public access improvements in the Point Reyes National Seashore to encourage healthy, safe and low-carbon methods of enjoying this amazing place.

I support the public access and bicycling improvements detailed under Alternatives B, C, D, E, and F under consideration and proposals that lead to planning and implementation of bicycling routes on trails, ranch roads, and pathways throughout the planning area, including but not limited to:

- 1) Connecting Devil's Gulch and Platform Bridge Road using existing ranch roads.
  - 2) Connecting Bolinas Ridge Trail at Olema Hill and Point Reyes Station to serve as an interim connection for the Cross Marin Trail.
  - 3) Connecting Bolinas Ridge Trail and Five Brooks Stables using existing ranch roads.
  - 4) Connecting Drakes Estero and Abbotts Lagoon Trail using existing ranch roads.
  - 5) Connecting Marshall Beach Trailhead and Pierce Point Road using existing ranch roads.
- and-
- 6) establishment of an Estero Trail loop using existing ranch roads.

I encourage NPS to collaborate with ranchers and other stakeholders including birders, nature lovers, hikers, bicyclists, and others to educate the public and address concerns related to public access on working ranch lands.

Also, I encourage the NPS to consider access bikes including Class A e-Bikes that can assist people who have some mobility limitations such as myself (mid-50s avid bicyclist) now purchasing a class A (<20mp, pedal assist) gravel eBike due to recent knee surgery. Such eBikes can coexist with regular bicycle and walking traffic since they have limited speed and require the bicyclist to pedal in order to engage the battery assist.

Since my injury, I have not been able to bike at or near the seashore, and I am no longer comfortable biking on paved roads with the increase in car traffic and incredible poor driving habits I see of people taking pictures with their smartphones while driving.

However, I do drive to the seashore to go birdwatching. Increased bicycling opportunities which currently are very limited and fragmented, would enable me to transfer my birdwatching to a more environmentally and physically sustainable form of transportation.

The improvements I support above would enable me and encourage my family to visit the Seashore more regularly-and by bike, eBike or both rather than by our electric car.

Thank you for considering my comments.

#6171

Name: MAYBURY, JOHN

Correspondence: Please maintain a healthy population of tule elk and other wildlife in this beautiful nature preserve.

#6172

Name: Evans, Bronwen

Correspondence: Tule elk are an important part of the landscape at Point Reyes. Their recovery is a result of successful native ecosystem restoration, which is a key element of the Park Service's mission. It's taken a lot of time, money and effort to restore tule elk to Point Reyes, the only national park where they live. Tule elk should be allowed to roam free and forage in the park - not shot, removed, fenced or treated as problem animals. Right now the Point Reyes ranches enjoy not only subsidized grazing fees and housing, but also taxpayer-funded infrastructure and road improvements, and publicly funded projects. But commercial activities at Point Reyes should be required to accommodate native wildlife - not the other way around. The Park Service shouldn't allow any new agricultural activities at Point Reyes. Planting artichokes or other row crops will attract birds. And introducing sheep, goats, pigs or chickens will attract native predators such as coyotes, bobcats and foxes. Expanded ranching would only create new wildlife conflicts.

#6173

Name: Satake, Den

Correspondence: I am fully in support of expanded bicycle trails in Pt Reyes National Seashore. It is nearly impossible to ride anywhere in the park without running afoul of bike restricted trails. With more trails and connectors, it would be possible to ride to and enjoy the beauty of the park without having to drive a car or ride along the dangerous shoulder of Highway 1. I love Pt Reyes and would love to be able to experience its beauty without having to drive there. Please open more of the park up to bicycles!

#6174

Name: Hunter, Susan

Correspondence: There is enough environmental degradation happening with out adding to a very fragile state of the planet. The elk are important to the area and must not be killed. How many species to be killed before we get it? Wild horses to be slaughtered. Now elk. This is outrageous. Wake up!

#6175

Name: N/A, N/A

Correspondence: I am writing to urge the National Park Service to discontinue the grazing of beef and dairy cattle

at Point Reyes National Seashore. This precious area has been damaged by livestock grazing which poses a threat to the environment and local wildlife and it should be protected and used to serve the public good, and not for the benefit of the livestock industry.

I strongly oppose Option B and any other proposal that would be fatal to Tule Elk or other wildlife to the benefit of ranching operations, and encourage the agency to adopt Option F to discontinue grazing and allow members of the public to enjoy this beautiful park and to be enriched with opportunities to visit and appreciate this special place.

#6176

Name: White, Michel

Correspondence: The Park Service shouldn't allow any new agricultural activities at Point Reyes. Planting artichokes or other row crops will attract birds. And introducing sheep, goats, pigs or chickens will attract native predators such as coyotes, bobcats and foxes. Expanded ranching would only create new wildlife conflicts. Cattle ranching should only be allowed if it's consistent with preserving the natural environment. And agricultural activities such as mowing shouldn't be allowed in park areas where they harm endangered species or wildlife habitat, impair water quality, cause excessive erosion or spread invasive plants/diseases. Cattle are the seashore's primary source of greenhouse gases. So the Park Service's preferred alternative is inconsistent with its own "Climate Friendly Parks" plan.

#6177

Name: Shubin, Neil

Correspondence:

I write in opposition to Option B and any other proposal that would be detrimental to Tule Elk or other wildlife and flora to the benefit of ranching operations. Expanded ranching operations will only serve to depress faunal and floral diversity, enhance runoff, and depress the quality of the Pt. Reyes ecosystems in general.

As this Seashore is a precious resource, and a fragile one, Option B does not serve the region or the broad user community of the Seashore at all.

#6178

Name: Williams, Christina

Correspondence: I am writing to urge the National Park Service to discontinue the grazing of beef and dairy cattle at Point Reyes National Seashore. This precious area has been damaged by livestock grazing which poses a threat to the environment and local wildlife and it should be protected and used to serve the public good, and not for the benefit of the livestock industry.

I strongly oppose Option B and any other proposal that would be fatal to Tule Elk or other wildlife to the benefit of ranching operations, and encourage the agency to adopt Option F to discontinue grazing and allow members of the public to enjoy this beautiful park and to be enriched with opportunities to visit and appreciate this special place.

#6179

Name: Park, Jeannie

Correspondence: Tule elk are an important part of the landscape at Point Reyes. Their recovery is a result of successful native ecosystem restoration, which is a key element of the Park Service's mission. It's taken a lot of time, money and effort to restore tule elk to Point Reyes, the only national park where they live. Tule elk should



be allowed to roam free and forage in the park - not shot, removed, fenced or treated as problem animals. We should support the natural ecosystems and not cattle and farmers only.

#6180

Name: Snavely, Irene

Correspondence: Once again, I will state my opposition against this awful plan to kill the Tule Elk. These are public lands - - not private lands to be used for the gain of a few select individuals. We the taxpayers pay for these lands which means they are to be used by all. Native species should be protected on NPS land.

#6181

Name: miller, ray

Correspondence: Continuing to allow cattle ranching on any national park in 2019 is absurd. Doing this in Point Reyes National Park and the surrounding environs where Tule Elk live is even a worse idea. The world does not need another beef or dairy cow, probably ever, really. But there will probably always be enough cows to go around. Growing cattle is best done on private land. Public land should be just that, for the public and the flora and fauna that are native to that land. Why should we, or the elk be submitted to some domestic beast that eats all the native plants and fouls the water? I am so sick of the attitude of farming and farmers/ranchers, especially in the West, to claim that they need more land for their own benefit. What a selfish and self-serving and ignorant and greedy attitude. Please, for heaven's sake, have some back bone and do the right thing and cancel all the 'rights' and claims the 'farmers' have to this PUBLIC land and leave us a place to enjoy the natural beauty of the world, WITH THE NATIVE ELK ON IT. Jeepers, should we really have to keep campaigning for this stuff? Shouldn't it just be a little obvious now that this is the right thing to do?

#6182

Name: Baxter, Joslyn

Correspondence: I am writing to urge the National Park Service to discontinue the grazing of beef and dairy cattle at Point Reyes National Seashore. This precious area has been damaged by livestock grazing which poses a threat to the environment and local wildlife and it should be protected and used to serve the public good, and not for the benefit of the livestock industry.

I strongly oppose Option B and any other proposal that would be fatal to Tule Elk or other wildlife to the benefit of ranching operations, and encourage the agency to adopt Option F to discontinue grazing and allow members of the public to enjoy this beautiful park and to be enriched with opportunities to visit and appreciate this special place.

#6183

Name: Rhoten, Ruth

Correspondence: Please work with Ranchers to minimize impact on native animals and the beautiful land.

#6184

Name: Votek, Joe

Correspondence: Dear Point Reyes National Seashore Superintendent, Please select the preferred alternative, "Alternative B" for the future of ranching in the Point Reyes National Seashore. I support agriculture in the Seashore and think it is a vital part of the region's history, culture, and current economy. I appreciate the time and effort that has gone into researching all options for the draft EIS. I support 20-year leases, the ability for farmers and ranchers to succession plan, and the opportunity for farms and ranches to diversify their operations to viability and sustainability adapt their operations for generations to come. I wish that the diversification was not so limited in scope or size, 2.5 acres around structures in ranch core with no irrigation and other restrictions is

cumbersome. In addition, the draft EIS would have been more complete if research was done on an option that includes an Elk Fence between the agriculture and wilderness area or Elk relocation to the wilderness area. Agriculture is a partner in natural resource conservation and preserving open spaces. Many of the beautiful natural landscapes in the US near large urban areas are preserved because agriculture was there first to curb development. Agriculture and nature do co-exist, we support the farmers and ranchers in the Seashore for their part in providing for the local foodshed in a sustainable way. Agriculture plays an important role in combating Climate Change by providing local food and carbon and greenhouse gas drawdown. Agriculture is important to me in the Point Reyes National Seashore, the preferred alternative B is the best option from the draft EIS.

#6185

Name: Streblov, Doug

Correspondence: Hello,

I'm writing to support the public access and bicycling improvements outlined under Alternatives B, C, D, E, and F. I strongly support proposals that would lead to the planning and implementation of bicycling routes on trails, ranch roads, and pathways throughout the planning area, including but not limited to: 1) a connection between Devil's Gulch and Platform Bridge Road using existing ranch roads, 2) a connection between Bolinas Ridge Trail at Olema Hill and Point Reyes Station to serve as an interim connection for the Cross Marin Trail, 3) a connection between Bolinas Ridge Trail and Five Brooks Stables using existing ranch roads 4) a connection between Drakes Estero and Abbotts Lagoon Trail using existing ranch roads, 5) a connection between Marshall Beach Trailhead and Pierce Point Road using existing ranch roads, and 6) an Estero Trail loop using existing ranch roads. I encourage NPS to collaborate with ranchers and other stakeholders to educate the public and address concerns related to public access on working ranch lands.

The improvements outlined above would enable and encourage me to visit the Seashore more regularly-and by bike, rather than car. I would feel much safer riding in the Seashore and surrounding areas on trails, pathways, and ranch roads, rather than on roads shared with fast-moving vehicular traffic. Bicycling opportunities are currently very limited and fragmented, so any improvements in connectivity and the creation of new loop options would enable me to enjoy more of the Seashore and surrounding areas by bike.

Thank you,

Doug

#6186

Name: Olson, Inger

Correspondence: I am writing to urge the National Park Service to discontinue the grazing of beef and dairy cattle at Point Reyes National Seashore. This precious area has been damaged by livestock grazing which poses a threat to the environment and local wildlife and it should be protected and used to serve the public good, and not for the benefit of the livestock industry.

I strongly oppose Option B and any other proposal that would be fatal to Tule Elk or other wildlife to the benefit of ranching operations, and encourage the agency to adopt Option F to discontinue grazing and allow members of the public to enjoy this beautiful park and to be enriched with opportunities to visit and appreciate this special place.

#6187

Name: Baker, Jeannie

Correspondence: Please protect the native wildlife!!

#6188

Name: Lochtie, Byrd

Correspondence: It is my understanding that the National Park Service is dedicated to accommodating and protecting the natural environment of all our national parks. I am writing in favor of true protection for the Tule Elk at Point Reyes National Seashore Park, and I request that you consider the following points in your care and maintenance of Point Reyes and the Tule Elk there. The Tule Elk are found only at Point Reyes. The Tule Elk numbers have decreased dramatically over the last few years. The Park Service is allowing hunting of the elk when they stray into land that the Park Service has leased to ranchers. It appears that the commercial value of leasing has taken precedence over the health of the elk herd. I love visiting National Parks, but I do not want them given over to commercial pursuits or to grazing. The Park Service should not allow any more agricultural activities on park land. The Park Service should maintain all parks for maximum protection, restoration and preservation of the natural environment.

Please put the health of our National Parks before any commercial or financial gain.

Thank you, Byrd A. Lochtie

#6189

Name: Lord, Patrice

Correspondence: Please do not promote cattle grazing over the rights of the Tule Elk. I am writing to urge the National Park Service to discontinue the grazing of beef and dairy cattle at Point Reyes National Seashore. This precious area has been damaged by livestock grazing which poses a threat to the environment and local wildlife and it should be protected and used to serve the public good, and not for the benefit of the livestock industry.

I strongly oppose Option B and any other proposal that would be fatal to Tule Elk or other wildlife to the benefit of ranching operations, and encourage the agency to adopt Option F to discontinue grazing and allow members of the public to enjoy this beautiful park and to be enriched with opportunities to visit and appreciate this special place.

#6190

Name: Koteen, Peggy

Correspondence: I urge the National Park Service to stop using the National Parks land for any cattle grazing at Point Reyes National Seashore. This precious area has been damaged by livestock grazing which poses a threat to the environment and local wildlife and it should be protected and used to serve the public good, and not for the benefit of the livestock industry.

I OPPOSE Option B and any other proposal that would be fatal to Tule Elk or other wildlife to the benefit of ranching operations. I urge your agency to ADOPT Option F to discontinue grazing.

Thank you for your time,

Peggy Koteen

#6191

Name: Feemster, Gary

Correspondence: Please keep cattle out of our national Parks.

#6192

Name: BEARD, David

Correspondence: I have used the Point Reyes NP since the 1960's. I visit to enjoy open spaces, natural non-commercial areas with plentiful natural wildlife. Farms and ranches with domesticated commercialized animals do not meet these requirements. I am surprised these commercial agricultural leases on our public lands continue to be tolerated and haven't been eliminated by eminent domain. I don't see how allowing their operations in PRNP meets the stated "maximum protection, restoration, and preservation of the natural environment" requirements of your Point Reyes Act. Your planned actions seem to conflict with the Park Service's stated mission. Tule Elk are an integral part of the Park wildlife. With their range and numbers critically reduced your discussing commercial shooting, removal, and fencing clashes with their preservation and are an ecological outrage. Ranches and farms subsist on taxpayer-funded infrastructure and roads and subsidized grazing fees and housing. Pursuing such policy changes may result in revising public funding code eliminating these benefits. an angry taxpayer

#6193

Name: Shomer, Forest

Correspondence: Point Reyes is absolutely unique and deserves the greatest possible protection, including from non-native grazing animals. It's where I began to learn plant identification over 50 years ago. I hope to preserve that possibility for generations yet to come.

#6194

Name: Nichols, Beverly

Correspondence: As a member of the California-based international animal protection nonprofit organization In Defense of Animals with over 250,000 supporters, I oppose the National Park Service plan to kill native Tule elk, grow commercial crops, and permit ranchers to add chickens, turkeys, sheep, pigs, and goats to their exploitative operations. For this reason, I support Alternative F.

As national park land, this property was specifically set aside to protect, restore, and preserve the natural environment including the wild animals who live there. The original intention was to phase out dairy and cattle ranching, not add more crops or animals to increase ranching profits.

The proposed plan does not address the damage from grazing, including water-quality degradation and soil erosion. Also, adding new crops will create more conflicts with native wild animals.

Please abandon this inhumane and destructive plan by selecting Alternative F. I urge you to restore the Seashore's Pastoral Zone for wild animal habitat and repurpose historic ranch buildings for scientific research, interpretation, and public education.

#6195

Name: Elias, Jim

Correspondence: Pt. Reyes National Seashore is a public jewel. I visit frequently and especially enjoy the park from the seat of my bike. I am however concerned about my safety when riding the busy roadways, particularly on the weekends. My experience of these tremendous public lands would be greatly enhanced, and made safer, if there were more and better riding opportunities for cycling environmentalists like myself.

In particular, I want to voice my support for Alternatives B, C, D, E & F. I enthusiastically support trails, pathways and ranch roads that would enable me to get off crowded roadways and take in the park's natural beauty without fearing distracted motorists. Like other cyclists, I'd be especially thrilled to do loops rather than rides that terminate in dead-ends. Fortunately, multiple loops can be created by simply connecting existing routes and ranch roads, as outlined in Alternatives B-F.

Thank you for considering my comments. Please move toward making Pt. Reyes National Seashore a model of shared use that both protects and celebrates this public treasure by enabling and enhancing the visitor experience for people on bikes.

Jim Elias

#6196

Name: Acuna, Ana

Correspondence: Please have the National Park Service discontinue the grazing of beef and dairy cattle at Point Reyes National Seashore. This precious area has been damaged by livestock grazing which poses a threat to the environment and local wildlife and it should be protected and used to serve the public good, and not for the benefit of the livestock industry.

I strongly oppose Option B and any other proposal that would be fatal to Tule Elk or other wildlife to the benefit of ranching operations, and encourage the agency to adopt Option F to discontinue grazing and allow members of the public to enjoy this beautiful park and to be enriched with opportunities to visit and appreciate this special place.

#6197

Name: Cook, Cheryl

Correspondence: I am writing to urge the National Park Service to discontinue the grazing of beef and dairy cattle at Point Reyes National Seashore. This precious area has been damaged by livestock grazing which poses a threat to the environment and local wildlife and it should be protected and used to serve the public good, and not for the benefit of the livestock industry.

I strongly oppose Option B and any other proposal that would be fatal to Tule Elk or other wildlife to the benefit of ranching operations, and encourage the agency to adopt Option F to discontinue grazing and allow members of the public to enjoy this beautiful park and to be enriched with opportunities to visit and appreciate this special place.

#6198

Name: Bugga, Hannah

Correspondence: Hello. I was horrified to hear that you were considering killing native elk. Wild animals deserve our protection, while ranching operations are disastrous for the environment. I would really expect a lot more compassion and understanding from a park.

#6199

Name: West, Brian

Correspondence: I'm writing to support the public access and bicycling improvements outlined under Alternatives B, C, D, E, and F. I strongly support proposals that would lead to the planning and implementation of bicycling routes on trails, ranch roads, and pathways throughout the planning area, including but not limited to: 1) a connection between Devil's Gulch and Platform Bridge Road using existing ranch roads, 2) a connection between Bolinas Ridge Trail at Olema Hill and Point Reyes Station to serve as an interim connection for the Cross Marin Trail, 3) a connection between Bolinas Ridge Trail and Five Brooks Stables using existing ranch roads 4) a connection between Drakes Estero and Abbotts Lagoon Trail using existing ranch roads, 5) a connection between Marshall Beach Trailhead and Pierce Point Road using existing ranch roads, and 6) an Estero Trail loop using existing ranch roads. I encourage NPS to collaborate with ranchers and other stakeholders to educate the public and address concerns related to public access on working ranch lands.

The improvements outlined above would enable and encourage me to visit the Seashore more regularly-and by bike, rather than car. I would feel much safer riding in the Seashore and surrounding areas on trails, pathways, and ranch roads, rather than on roads shared with fast-moving vehicular traffic. Bicycling opportunities are currently very limited and fragmented, so any improvements in connectivity and the creation of new loop options would enable me to enjoy more of the Seashore and surrounding areas by bike.

#6200

Name: Davies, Lynne

Correspondence: I am writing to urge the National Park Service to discontinue the grazing of beef and dairy cattle at Point Reyes National Seashore. This precious area has been damaged by livestock grazing which poses a threat to the environment and local wildlife and it should be protected and used to serve the public good, and not for the benefit of the livestock industry.

I strongly oppose Option B and any other proposal that would be fatal to Tule Elk or other wildlife to the benefit of ranching operations, and encourage the agency to adopt Option F to discontinue grazing and allow members of the public to enjoy this beautiful park and to be enriched with opportunities to visit and appreciate this special place.

#6201

Name: Baumsteiger, Josh

Correspondence: Thank you for considering bicycle use in the national park!!

I'm writing to support the public access and bicycling improvements outlined under Alternatives B, C, D, E, and F. I strongly support proposals that would lead to the planning and implementation of bicycling routes on trails, ranch roads, and pathways throughout the planning area, including but not limited to: 1) a connection between Devil's Gulch and Platform Bridge Road using existing ranch roads, 2) a connection between Bolinas Ridge Trail at Olema Hill and Point Reyes Station to serve as an interim connection for the Cross Marin Trail, 3) a connection between Bolinas Ridge Trail and Five Brooks Stables using existing ranch roads 4) a connection between Drakes Estero and Abbotts Lagoon Trail using existing ranch roads, 5) a connection between Marshall Beach Trailhead and Pierce Point Road using existing ranch roads, and 6) an Estero Trail loop using existing ranch roads. I encourage NPS to collaborate with ranchers and other stakeholders to educate the public and address concerns related to public access on working ranch lands.

The improvements outlined above would enable and encourage me to visit the Seashore more regularly-and by bike, rather than car. I would feel much safer riding in the Seashore and surrounding areas on trails, pathways, and ranch roads, rather than on roads shared with fast-moving vehicular traffic. Bicycling opportunities are currently very limited and fragmented, so any improvements in connectivity and the creation of new loop options would enable me to enjoy more of the Seashore and surrounding areas by bike.

Thank you!!

#6202

Name: N/A, N/A

Correspondence: I strongly support the public access and bicycling improvements outlined under Alternatives B, C, D, E, and F. I strongly support proposals that would lead to the planning and implementation of bicycling routes on trails, ranch roads, and pathways throughout the planning area. Please do your best to make these and other bike friendly legislation become law.

#6203

Name: N/A, Francis  
Correspondence: Hello,

I'm writing to support the public access and bicycling improvements outlined under Alternatives B, C, D, E, and F. I strongly support proposals that would lead to the planning and implementation of bicycling routes on trails, ranch roads, and pathways throughout the planning area, including but not limited to: 1) a connection between Devil's Gulch and Platform Bridge Road using existing ranch roads, 2) a connection between Bolinas Ridge Trail at Olema Hill and Point Reyes Station to serve as an interim connection for the Cross Marin Trail, 3) a connection between Bolinas Ridge Trail and Five Brooks Stables using existing ranch roads 4) a connection between Drakes Estero and Abbotts Lagoon Trail using existing ranch roads, 5) a connection between Marshall Beach Trailhead and Pierce Point Road using existing ranch roads, and 6) an Estero Trail loop using existing ranch roads. I encourage NPS to collaborate with ranchers and other stakeholders to educate the public and address concerns related to public access on working ranch lands.

The improvements outlined above would enable and encourage me to visit the Seashore more regularly-and by bike, rather than car. I would feel much safer riding in the Seashore and surrounding areas on trails, pathways, and ranch roads, rather than on roads shared with fast-moving vehicular traffic. Bicycling opportunities are currently very limited and fragmented, so any improvements in connectivity and the creation of new loop options would enable me to enjoy more of the Seashore and surrounding areas by bike.

Thank you, Francis

#6204

Name: Mirzayan, Tenny

Correspondence: I am writing to urge the National Park Service to discontinue the grazing of beef and dairy cattle at Point Reyes National Seashore. This precious area has been damaged by livestock grazing which poses a threat to the environment and local wildlife and it should be protected and used to serve the public good, and not for the benefit of the livestock industry.

I strongly oppose Option B and any other proposal that would be fatal to Tule Elk or other wildlife to the benefit of ranching operations, and encourage the agency to adopt Option F to discontinue grazing and allow members of the public to enjoy this beautiful park and to be enriched with opportunities to visit and appreciate this special place.

#6205

Name: Frisk, Laura

Correspondence: I am writing to urge the National Park Service to discontinue the grazing of beef and dairy cattle at Point Reyes National Seashore. This precious area has been damaged by livestock grazing which poses a threat to the environment and local wildlife and it should be protected and used to serve the public good, and not for the benefit of the livestock industry.

I strongly oppose Option B and any other proposal that would be fatal to Tule Elk or other wildlife to the benefit of ranching operations, and encourage the agency to adopt Option F to discontinue grazing and allow members of the public to enjoy this beautiful park and to be enriched with opportunities to visit and appreciate this special place.

#6206

Name: Patrick , Janice

Correspondence: As this is definitely the Year of the Vegan all efforts to provide more land for cattle and other farm animals will, in the end, be fruitless. People are switching their diets away from the flesh of animals.

#6207

Name: Gredzinski, Sheila

Correspondence: There's no need to kill to eat. We have to progress and learn to coexist or this planet die. Us with it, deservedly.

#6208

Name: Zaninovich, Sandra

Correspondence: I am writing to urge the National Park Service to discontinue the grazing of beef and dairy cattle at Point Reyes National Seashore. This precious area has been damaged by livestock grazing which poses a threat to the environment and local wildlife and it should be protected and used to serve the public good, and not for the benefit of the livestock industry.

I strongly oppose Option B and any other proposal that would be fatal to Tule Elk or other wildlife to the benefit of ranching operations, and encourage the agency to adopt Option F to discontinue grazing and allow members of the public to enjoy this beautiful park and to be enriched with opportunities to visit and appreciate this special place.

#6209

Name: Von Dohre, Beverly

Correspondence: PLEASE do not harm the Tule Elk, either by killing or by giving birth control. They are such an important part of Pt. Reyes, and previously have been killed almost to extinction. Pt. Reyes National Seashore land already consists of ranches with cattle that damage and pollute the earth and water. Some times of year, the stench is horrific. I've heard that the ranchers trap and kill native animals, but there is so much secrecy. Most people, including docents, don't even know about the past pesticide spraying at Abbott's Lagoon to kill plants that are not even a problem, even though the poison endangers the Snowy Plovers and other birds and permanently contaminate the environment.

I'd thought there was a possible plan to eventually eliminate the ranches, but now they seem to have more power than ever. Why?

If the Elk truly are increasing beyond what the entirety of Pt. Reyes can take (and I mean instead of the cattle), why let some go to their old habitats on various park lands and open spaces like the EBRPD in the East Bay?

I oppose the National Park Service's plan to kill native tule elk and expand commercial agriculture in Point Reyes National Seashore and Golden Gate National Recreation Area. I urge the National Park Service to instead restore the lands for wild animal habitat.

#6210

Name: Desouza, Andre

Correspondence: Dear members of National Parks, Please let's focus in protecting the wildlife and not focusing in ranchers idealism, it is time to give back to Nature what belongs to Nature. " Park services " To protect the parks and Everything on it.. let's please do the main job.. protect nature not destroying.

#6211

Name: FROLOVE, CINDI

Correspondence: I am writing to urge the National Park Service to discontinue the grazing of beef and dairy cattle at Point Reyes National Seashore. This precious area has been damaged by livestock grazing which poses a threat



to the environment and local wildlife and it should be protected and used to serve the public good, and not for the benefit of the livestock industry.

I strongly oppose Option B and any other proposal that would be fatal to Tule Elk or other wildlife to the benefit of ranching operations, and encourage the agency to adopt Option F to discontinue grazing and allow members of the public to enjoy this beautiful park and to be enriched with opportunities to visit and appreciate this special place.

Regards, Cindi

#6212

Name: moore, thomas

Correspondence: I care.

#6213

Name: Ingelsson, Kajsa

Correspondence: we need more wildlands. lets keep our planet, what's left of her anyway, wild.

#6214

Name: Soares, David

Correspondence: I am writing to urge the National Park Service to discontinue the grazing of beef and dairy cattle at Point Reyes National Seashore. This precious area has been damaged by livestock grazing which poses a threat to the environment and local wildlife and it should be protected and used to serve the public good, and not for the benefit of the livestock industry.

I strongly oppose Option B and any other proposal that would be fatal to Tule Elk or other wildlife to the benefit of ranching operations, and encourage the agency to adopt Option F to discontinue grazing and allow members of the public to enjoy this beautiful park and to be enriched with opportunities to visit and appreciate this special place.

#6215

Name: Gentile, Diane

Correspondence: I am writing to encourage the National Park Service to address the upcoming lease renewal for Point Reyes National Seashore with the focus on preserving this PARK for the public and future generations.

Surely you are aware of how grazing negatively affects ecosystems, causing water pollution and soil erosion, spreading invasive species and disease, and harming endangered species. Further, our national parks should NOT be used as cattle ranches for personal profit.

The preservation of native wild species, including elk, mountain lions, bobcats and other species are facing survival challenges like never before. Protecting wildlife and ecosystems must take precedence.

#6216

Name: Hodges, Suzanne

Correspondence:

Hello Suzanne,

The small, mostly isolated population of Tule elk are in danger due to the National Park Service's (NPS) commitment to cattle ranching at Point Reyes National Seashore. Point Reyes is currently the only national park in the country that hosts this subspecies of elk. Today, there are around 4,000 Tule elk in total, all residing in California; this is a stark contrast to the population of 500,000 that existed in California in 1880.

According to the NPS, in 2017 the number of Tule elk at Point Reyes was roughly 660, split between Tomales Point, Drakes Beach, and areas around Limantour Road.

The National Park Service's mission statement includes the claim that it "cooperates with partners to extend the benefits of natural and cultural resource conservation and outdoor recreation throughout this country and the world." However, the preferred plan of the NPS regarding the Tule elk in no way benefits natural and cultural resource conservation. The preferred plan of the NPS includes culling the already low population by encouraging shooting Tule elk that cross into areas specifically designated for ranching.

In this case, it appears the only partners to the NPS are those in the dairy or cattle grazing business. In 2017 the NPS settled a lawsuit whereby it became a requirement for the NPS to plan for any impacts as a result of cattle ranching, which includes over 26,000 acres of land at Point Reyes. It does not appear that the NPS is honoring this requirement.

In addition to the reduction of public access to recreation - another commitment claimed by the NPS in its mission statement - the impact from cattle ranching leads to soil erosion, water pollution, invasive plants, declines in fish and bird populations, conflicts with wildlife, and even more greenhouse gas emissions.

We are at a point where the climate crisis is a top priority and should be particularly so for a federal agency like the National Park Service that is widely relied upon to maintain healthy environments and natural resources. Disappointingly, the priority of this agency appears to be profit over the protection of the Tule elk, and therefore other wildlife populations as part of the cascading effect of using lethal means to decrease the already small number of Tule elk we have left.

**TAKE ACTION NOW:** [Click Here to Submit Comments Online](#) The Point Reyes National Seashore General Management Plan Amendment and Environmental Impact Statement is proposing to dedicate one third of Point Reyes National Seashore to cattle ranching and includes plans to kill off Tule elk that frequent the area. This plan only benefits twenty-four cattle ranchers who sold their land to the public 60 years ago, but still use Point Reyes National Seashore is supposed to be managed under the Point Reyes Act for "maximum protection, restoration, and preservation of the natural environment." There's no mandate for prioritizing commercial agricultural leases on these public lands. Natural values, native wildlife, public access and enjoyment should take priority over commercial activities at Point Reyes. Tule elk are an important part of the landscape at Point Reyes. Their recovery is a result of successful native ecosystem restoration, which is a key element of the Park Service's mission. It's taken a lot of time, money and effort to restore tule elk to Point Reyes, the only national park where they live. Tule elk should be allowed to roam free and forage in the park - not shot, removed, fenced or treated as problem animals. Right now the Point Reyes ranches enjoy not only subsidized grazing fees and housing, but also taxpayer-funded infrastructure and road improvements, and publicly funded projects. But commercial activities at Point Reyes should be required to accommodate native wildlife - not the other way around. The Park Service shouldn't allow any new agricultural activities at Point Reyes. Planting artichokes or other row crops will attract birds. And introducing sheep, goats, pigs or chickens will attract native predators such as coyotes, bobcats and foxes. Expanded ranching would only create new wildlife conflicts. Cattle ranching should only be allowed if it's consistent with preserving the natural environment. And agricultural activities such as mowing shouldn't be allowed in park areas where they harm endangered species or wildlife habitat, impair water quality, cause excessive erosion or spread invasive plants/diseases. Cattle are the seashore's primary source of greenhouse gases. So the Park Service's preferred alternative is inconsistent with its own "Climate Friendly Parks" plan.

"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." -National Park Service EPI

#6217

Name: Morse, Natalie

Correspondence: I do not believe that some mammals should have ability to decide the fate of others! It anger me to know that such actions could be supported, we are part of animal kingdom and we cannot "create" the rules in what we believe in everybody's favor. It has to stop.

#6218

Name: Waters, Michelle

Correspondence: I am writing as a citizen who has been visiting Point Reyes for 35 years, to get a respite from city life, and to see and photograph wildlife. I urge the National Park Service to adopt Alternative F, ending ranching in Point Reyes.

I am quite disturbed to see the Park Service recommending an increase of ranching, and the recommendation that some of the Tule Elk be killed. This goes directly against the Park Service's stated mission of protecting natural resources. Cows are non-native and they are severely negatively impacting the land, native animals and ocean water quality in the Seashore. Tule Elk have always been native to this part of coastal California, and I'm one of thousands who come to hike the trails of Point Reyes every year hoping to see and photograph the elk. To this end my family and I have spent money taking interpretative classes, staying in local Point Reyes Station lodging and patronizing the shops and restaurants of Point Reyes Station and Inverness. We don't come to Point Reyes to see cows! We come to see and experience wildlife.

The National Park Service's obligation to preserve historic and cultural resources can be achieved through interpretative displays of historic ranching. The cows in the National Seashore are not historic; the ranch buildings and infrastructure are. Some of the ranches clearly don't want visitors, as evidenced by No Trespassing signs. I urge the Park Service to focus on preserving and interpreting historic ranching buildings to show how ranches operated, instead of perpetuating the environmental damage that the ranches are causing.

The NPS's mission doesn't include guaranteeing ranchers a living, and doesn't include allowing them to increase their operations on our public lands. There has been no discussion on how increasing ranching would impact the Seashore, and indeed no discussion of the serious negative impact to land and water from the livestock that are already at the Seashore. Further, the NPS has recommended increasing commercial ranching operations with no mind to impacts on the numerous native animals who inhabit the park. As someone who visits Point Reyes specifically to see wildlife, I'm very concerned about the negative impacts to native species from both existing ranching and the threat of increased ranching and other commercial operations.

I am against the proposed changes to succession which would permanently commit the National Seashore lands to ranching.

The Environmental Impact Statement discusses negative impacts of cattle grazing to native plants and animals, water pollution from cattle manure and greenhouse gasses from cattle ranching. Yet none of the proposed alternatives address mitigation efforts for the damage done over more than a century of cattle grazing. This is a gross oversight, and should be remedied. There should be discussion of costs and a timeline for mitigating the impacts of ranching to the Seashore.

In sum, I strongly urge the National Park Service to uphold the stated values of protecting natural resources by selecting Alternative F, to end ranching at Point Reyes National Seashore. This is the best and clearest way of

insuring that future generations of visitors will also be able to benefit from and enjoy a true wilderness experience with native wildlife.

#6219

Name: O'Brien, Vincent

Correspondence: I'm writing to support the public access and bicycling improvements outlined under Alternatives B, C, D, E, and F. I strongly support proposals that would lead to the planning and implementation of bicycling routes on trails, ranch roads, and pathways throughout the planning area, including but not limited to: 1) a connection between Devil's Gulch and Platform Bridge Road using existing ranch roads, 2) a connection between Bolinas Ridge Trail at Olema Hill and Point Reyes Station to serve as an interim connection for the Cross Marin Trail, 3) a connection between Bolinas Ridge Trail and Five Brooks Stables using existing ranch roads 4) a connection between Drakes Estero and Abbotts Lagoon Trail using existing ranch roads, 5) a connection between Marshall Beach Trailhead and Pierce Point Road using existing ranch roads, and 6) an Estero Trail loop using existing ranch roads. I encourage NPS to collaborate with ranchers and other stakeholders to educate the public and address concerns related to public access on working ranch lands.

The improvements outlined above would enable and encourage me to visit the Seashore more regularly-and by bike, rather than car. I would feel much safer riding in the Seashore and surrounding areas on trails, pathways, and ranch roads, rather than on roads shared with fast-moving vehicular traffic. Bicycling opportunities are currently very limited and fragmented, so any improvements in connectivity and the creation of new loop options would enable me to enjoy more of the Seashore and surrounding areas by bike.

#6220

Name: Olrich, Krage

Correspondence: Access to trails for mountain biking are very limited in this area. I have only accessed Point Reyes National Park by foot because there is pretty much no access for mountain biking. The park is fairly big and allowing mountain bike access is the right thing to do. Mountain bikers in marin have been forced to all use the limited amount of bike legal trails in Marin County. Adding more access to mountain bike trails in other areas will help relieve the congestion on the few bike legal trails and the reduce the amount of trail conflicts with other users on those trails due to unproportional amount of trail users/mountain bike riders in one area. The park already allows horses at the park in Point Reyes and there is plenty of space within the park to allow mountain bikes access to existing trails and to allow mountain bikes to be part of the team in maintaining existing and possibly adding new trails in the area to create a workable solution. Thank you!

#6221

Name: Thompson, Ann

Correspondence: The elk here are a treasure and deserve to be protected!

#6222

Name: Ruther, Michelle

Correspondence: Preservation of native wild species must take precedence over farming and ranching activities. Grazing negatively affects ecosystems, causing water pollution and soil erosion, spreading invasive species and disease, and harming endangered species.

#6223

Name: Montoliu, Raphael

Correspondence: "Shockinglly, several NPS proposals include killing the native Tule Elk in order to continue grazing livestock."

Are you OUT OF YOUR FUCKING MINDS???????

End livestock grazing at Point Reyes National Park and allow this precious land to remain as wildlife habitat and to be used for the public good, not for the benefit of the livestock industry!

#6224

Name: N/A, N/A

Correspondence: We are at a point where the climate crisis is a top priority and should be particularly so for a federal agency like the National Park Service that is widely relied upon to maintain healthy environments and natural resources. Disappointingly, the priority of this agency appears to be profit over the protection of the Tule elk, and therefore other wildlife populations as part of the cascading effect of using lethal means to decrease the already small number of Tule elk we have left.

Point Reyes National Seashore is supposed to be managed under the Point Reyes Act for "maximum protection, restoration, and preservation of the natural environment." There's no mandate for prioritizing commercial agricultural leases on these public lands.

Natural values, native wildlife, public access and enjoyment should take priority over commercial activities at Point Reyes.

Tule elk are an important part of the landscape at Point Reyes. Their recovery is a result of successful native ecosystem restoration, which is a key element of the Park Service's mission. It's taken a lot of time, money and effort to restore tule elk to Point Reyes, the only national park where they live. Tule elk should be allowed to roam free and forage in the park - not shot, removed, fenced or treated as problem animals.

Right now the Point Reyes ranches enjoy not only subsidized grazing fees and housing, but also taxpayer-funded infrastructure and road improvements, and publicly funded projects. But commercial activities at Point Reyes should be required to accommodate native wildlife - not the other way around.

The Park Service shouldn't allow any new agricultural activities at Point Reyes. Planting artichokes or other row crops will attract birds. And introducing sheep, goats, pigs or chickens will attract native predators such as coyotes, bobcats and foxes. Expanded ranching would only create new wildlife conflicts.

Cattle ranching should only be allowed if it's consistent with preserving the natural environment. And agricultural activities such as mowing shouldn't be allowed in park areas where they harm endangered species or wildlife habitat, impair water quality, cause excessive erosion or spread invasive plants/diseases.

Cattle are the seashore's primary source of greenhouse gases. So the Park Service's preferred alternative is inconsistent with its own "Climate Friendly Parks" plan.

#6225

Name: Blankenship, Stacey

Correspondence: Alternative F: No ranching. I come to the park to experience nature not a ranching operation ranching I can see anywhere. I also have grave concerns about the impact the ranching operations are having on the park and the wild animals. The feedlots and silage cutting attract more predatory species like the Raven which have a detrimental effect on native birds since the Raven is known to pillage nests of other birds. The large amount of manure produced by the cows is of great concern because of issues such as e-coli and spreading of non-native weeds and plants. Not to mention that the topography of Point Reyes said e-coli could wind up on the beaches where our children and family's love to play. It is my understanding that since 2012 Point Reyes has ranked in the top 10 places for e-coli contaminant. And the decline of the elk herd between 2012-2014

#6226

Name: Fowler, Madonna

Correspondence: Please protect this area from encroachment and save it for future generations.

#6227

Name: Huynh, Vi

Correspondence: I am a visitor to Point Reyes National Seashore. I come there to look at the Tule Elk, not the cows. I would like you to prioritize biodiversity and environmental health and restore our coastal prairie. You can do this by adopting Alternative F. Please save the Tule Elk.

#6228

Name: Bolle, Christy

Correspondence: We NEED to preserve this area for the WILDLIFE!!! They have the RIGHT to be there!! Greedy cattle ranchers need to take a hike!!! NO Renewal for their grazing cattle on this land!! We need to stand up & protect the wildlife that we have left & the precious land that is left for them!!!! More people need to become aware of what the cattle ranchers are doing!! They are also try to get rid of all of AMERICAS WILD HORSES TOO!!So VERY, VERY WRONG !!We need to step up & FUGHT for the wild ones we have left!!!!

#6229

Name: Orrey, Monika

Correspondence: I am writing to urge the National Park Service to discontinue the grazing of beef and dairy cattle at Point Reyes National Seashore. This precious area has been damaged by livestock grazing which poses a threat to the environment and local wildlife and it should be protected and used to serve the public good, and not for the benefit of the livestock industry.

I strongly oppose Option B and any other proposal that would be fatal to Tule Elk or other wildlife to the benefit of ranching operations, and encourage the agency to adopt Option F to discontinue grazing and allow members of the public to enjoy this beautiful park and to be enriched with opportunities to visit and appreciate this special place.

#6230

Name: N/A, N/A

Correspondence: Point Reyes National Seashore is supposed to be managed under the Point Reyes Act for "maximum protection, restoration, and preservation of the natural environment." There's no mandate for prioritizing commercial agricultural leases on these public lands. Natural values, native wildlife, public access and enjoyment should take priority over commercial activities at Point Reyes. Tule elk are an important part of the landscape at Point Reyes. Their recovery is a result of successful native ecosystem restoration, which is a key element of the Park Service's mission. It's taken a lot of time, money and effort to restore tule elk to Point Reyes, the only national park where they live. Tule elk should be allowed to roam free and forage in the park - not shot, removed, fenced or treated as problem animals. Right now the Point Reyes ranches enjoy not only subsidized grazing fees and housing, but also taxpayer-funded infrastructure and road improvements, and publicly funded projects. But commercial activities at Point Reyes should be required to accommodate native wildlife - not the other way around.

#6231

Name: Cunningham, Margot

Correspondence: I have been coming to Pt. Reyes National Seashore for over 4 decades because I want to see the native plants and animals in their native landscapes.

But hiking, birdwatching, wildlife photography, wildflower-viewing, and other recreational activities are limited by barbed-wire fences, gates, and what seem like private ranchlands that are actually fully owned by the public, inside Point Reyes National Seashore and Golden Gate National Recreation Area.

The management of the Seashore is overbalanced in favor of commercial ranching interests. Park management needs to be re-balanced towards the protection and restoration of natural resources, consideration of recreational opportunities, and the preservation of historic barns, as well as increasing the interpretation of the history and cultural landscapes of the region.

The NPS cites its obligation to preserve historic and cultural resources. Some of the ranch buildings and infrastructure are historic, but permitting 6,000 cattle in the park or allowing additional agriculture that never before existed at the Seashore are not historic resources and should not be allowed. The park can educate the public about historic and cultural resources with interpretive signs and trails and NPS-initiated programs, not by encouraging private enterprises through extended ranch leases and expanded forms of agriculture and commercial enterprises. The NPS mission does not include lining the pockets of private enterprises.

Congress established the Seashore in 1962, In order to save and preserve, for the purposes of public recreation, benefit, and inspiration, a portion of the diminishing seashore of the United States that remains undeveloped. (Sec. 459c. Point Reyes National Seashore enabling legislation)

And protection, restoration, and preservation of the Seashore was a priority: &the property acquired by the Secretary under such sections 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,& (Sec. 459c-6.)

The mission of National Parks is to protect native plants and animals. The 1916 National Park Service Organic Act makes protection of natural resources the highest management priority in decision-making for all units of the national park system, including seashores and recreation areas:

100101. Promotion and regulation (a) In General.-The Secretary, acting through the Director of the National Park Service, shall promote and regulate the use of the National Park System by means and measures that conform to the fundamental purpose of the System units, which purpose is to conserve the scenery, natural and historic objects, and wild life in the System units and to provide for the enjoyment of the scenery, natural and historic objects, and wild life in such manner and by such means as will leave them unimpaired for the enjoyment of future generations.

But if the National Park Service approves their Preferred Alternative (Alternative B), livestock will be protected and promoted at the cost of native plants and animals. Currently 24 ranchers hold lease/permits on 18,000 acres of Point Reyes and 10,000 acres of the north district of Golden Gate. Approximately 2,400 animal units of livestock for beef ranching and 3,315 dairy animals are currently permitted, and this would continue if the park approves Alternative B (with a slight increase in dairy cattle). This amount of cattle has impoverished the native coastal prairie habitat and threatened native wildlife, such as coho salmon, steelhead trout, California freshwater shrimp, and Western snowy plover.

The Environmental Impact Statement expresses that the land, water, and wildlife of the Seashore are being harmed by cattle grazing.

Livestock have degraded and destroyed native coastal prairies, meadows, riparian areas, and wetlands on the Seashore. They have impacted water quality. Fecal coliform bacterial pollution from the dairies on Point Reyes are

causing unacceptable water quality human health hazards on beaches on in Tomales Bay. Cattle pollution is also impacting Cordell Banks and Greater Farallones National Marine Sanctuaries in the Pacific Ocean off the coast of Point Reyes. The parks proposals for improving water quality and dealing with the large amounts of cow manure are inadequate and unspecific.

High potentially pathogenic bacteria counts have been measured in Kehoe Creek and Abbotts Lagoon, and many samples exceeded the potentially pathogenic bacteria standard. Stormwater runoff from dairy manure management pools and pastures has contributed to hazardous water and beach conditions for park visitors. One mitigation attempt was to construct a modern dairy loafing barn on I Ranch to try to contain the manure more effectively, but this does not meet with historic district standards. The impossibility of managing a safe park with historic and biological resources preserved for visitor enjoyment is apparent in the parks ranching proposal.

Sensitive springs in the ranching zone would be developed for livestock watering facilities with pipes and troughs, as many are today, which is unacceptable in a national park that was designated for natural resource conservation, not business operations.

Alternative B calls for culling free-roaming native elk in the Drakes Beach and Limantour herds. These elk, the true historic occupants of the Point Reyes peninsula, were released into the Phillip Burton Wilderness within Point Reyes National Seashore to be free-roaming, not behind fences, as the original legislation forming the park intended.

The native free-roaming tule elk herds are small compared to the cattle herds in the Seashore. And tule elk have an estimated AU equivalent of 0.26 to 0.47 at Point Reyes-they weigh much less than one cow animal unit. The Drakes Beach tule elk herd consists of 124 animals and the Limantour herd has 174, and these herds follow local seasonal migrations into different areas, concentrating and breaking up into smaller herds during and after the late summer rut. This leads to some elk often spending time in the cattle pastures within the park. Yet instead of reducing cattle numbers and geographic extent, the park service is proposing to shoot these elk if they cross over barbed-wired fences into ranches, and their meat donated to charities or tribal groups.

This proposal goes against the goals of the 1998 Tule Elk Management Plan to maintain viable populations of a free-range elk herd in Point Reyes and to manage with minimal intrusion to regulate population size, where possible, as part of natural ecosystem processes.

Tule elk on Point Reyes National Seashore suffer from Johnes disease contracted from cattle, and in places have nutrient deficiencies and low birth rates. The best management of elk on Point Reyes National Seashore would be to remove the 3-mile-long fence that contains the 432 tule elk kept in the Tomales Elk reserve, and allow them to roam freely into the rest of the park. Point Reyes elk are believed to be among the most inbred in California, having lost an estimated 80% of their retained genetic variability. Instead of confining and culling them, the National Park Service should be considering a program of selected translocation from other more genetically diverse tule elk herds in California, in order to diversify the genetics of the Point Reyes tule elk population.

Livestock operations on the Seashore have increased populations of non-native and invasive plants, which dominate the vegetation in grassland zones. Continuous heavy grazing and trampling with high cattle stocking rates keeps these grasslands at an early seral state, which favors non-native weeds and does not allow the formation of native coastal prairie and valley grassland within the planning area. The park is proposing to use herbicides to control invasive plants, but they will continue to spread because of disturbance from cow hooves and grazing.

Ranchers have to truck in tons of alfalfa hay and grow hundreds of acres of silage, which contains invasive weeds such as mustard and radish, on park land that should be habitat for native plants and animals. In fact, the native coastal prairies have been all but eliminated from most of the cattle-grazed lands, and the native plant communities converted to European weedy grasses and forbs.



The proposed Pasture subzones of Alternative B would allow seeding and mowing of vegetation for livestock production in over 9,000 acres of the Seashore. And the Ranch Core subzone would allow row crops, new buildings, and onsite farm processing plants.

These high-value and beautiful national park lands should not be converted into cattle feedlots and farm operations. Private interests should not be able to diversify their income at the expense of public lands, recreational opportunities, rare species, and native ecosystems. National Park lands are meant to preserve, restore and interpret nature and history for the public benefit, not cater to private modern industrial interest groups.

The parks proposal is too vague and limited concerning monitoring and mitigation to protect water quality, rare species, and habitats. Costs and timelines for mitigation are not given. Enforcement of rancher compliance will likely not be effective given the current poor quality of the pastoral zone. Internal Park Service memos indicate monitoring the ranches for lease compliance and environmental damages already places outsized demands on the Seashores staff and budget. The NPS has failed to enforce lease agreements when leases are violated.

The park proposes to use adaptive management in order to try to limit cattle damage to sensitive resources, but this strategy postpones figuring out the details of management until a future time and may never happen. Much more detail is needed now of how tule elk, other wildlife, and native habitats will be protected.

Alternative F would discontinue ranching operations and cattle grazing, and allow tule elk to establish new herds in the pastoral zone of Point Reyes National Seashore. I support this planning alternative.

#6232

Name: Weinstein, Joseph

Correspondence: I urge the National Park Service to discontinue cattle grazing at Point Reyes National Seashore. The terrain and local native wildlife have been and are adversely impacted by livestock grazing.

Yes, I know quite well from experience, notably my earliest visits in the 1950s (BEFORE establishment of the Seashore!) and into the 1970s, that some amount of ranching - primarily for dairy cattle - has long been in place at Point Reyes.

However, it is now high time - even past time - for phase-out, to provide more consistent protection and welcome for habitat and native wildlife and for us human visitors. Compared with half a century ago, this 'island in time' is now much more valuable as a unique natural space and merits enhanced and stricter protection as such.

#6233

Name: Bowers, ida

Correspondence: My husband and I love the Point Reyes park and we have been going there to camp and hike for many years. It must be preserved for future generations!!!

#6234

Name: Baum, Bruce

Correspondence: I reject the NPS Alternative B as the "Preferred Plan".

I support Alternative Plan F for the following reasons:

NPS is proposing changing the founding legislation that was passed by congress. Founding legislation can only be changed by an act of Congress or a vote by the voters of the US.

Founding legislation does not allow the transfer of leases (succession) to third parties.

Continuing to allow cattle in the Point Reyes National Seashore will perpetuate Johne's Disease, a.k.a. MAP (Mycobacterium avium paratuberculosis). Johne's Disease has been passed on to the Tule Elk. This disease has been linked to Crohns disease in humans. <https://www.ncbi.nlm.nih.gov/pmc/articles/PMC4894645/>

Additionally, what are the long term effects of bovine herds on erosion within the park? Has it been studied?

Allowing the ranchers to conduct roadside produce stands is not consistent with U.S. National Parks.

Allowing the ranchers to operate Bed & Breakfast lodging creates energies and commerce that is not consistent with the founding legislation of PRNS.

PRNS is a National Park not an amusement park.

#6235

Name: Yordon, Alexis

Correspondence: Public land - aka the land I own as a taxpayer - is to be kept in a condition that allows the native fauna to flourish. Enough with the extermination of native species for the betterment of cattle!

#6236

Name: Fischer, Dennis

Correspondence: I express my position that the NPS should adopt alternative F to end ranching and dairy operations in Point Reyes National Seashore (PRNS). I do not support NPS's preferred alternative B-which continues use of public land to ranch and dairy operations that prioritizes these commercial activities over recreation, wildlife and protecting natural resources. The reason I visit PRNS is to see wildlife, not cows. As I understand the role of the National Park system, its role and mission of is to protect native plants and animals and not to be a home for commercial ranching and dairy operations. This is especially troubling to me as the commercial market for dairy milk in the U.S. has been steadily declining since 2010 per USDA data. More than a century of continued cattle grazing has upset the natural ecosystems of the park. It is upsetting to see the degraded land that has resulted from cattle grazing. From the above, here are my lists of questions: 1) In all the GMP alternatives presented except for (A) and (F), there are provisions for diversifying the existing ranching and dairy operations to allow production of pigs, sheep, goats, and chickens. I did not find any estimate in the EIP of how these expanded extractive operations would impact wildlife, natural resources, and pollution. Has this been studied and its impact assessed appropriately in formulating the NPS' recommendations? 2) In formulating its GMP recommendations, the NPS cites its obligation to "preserve the historic and cultural" resources of PRNS. Other than the non-working ranch at Pierce Point, there isn't any other interpretation facility at PRNS. The public is generally unwelcome at the operating ranch and dairy operations. Why would it not be possible to preserve the historic cultural aspects of PRNS without having 6,000 cows? In fact, if there were no operating ranches or dairy operations, would it not be possible to broaden public facilities that preserve and document these important elements? 3) In the U.S., extractive industries have a requirement to plan, budget and be held responsible for the costs and operations to properly abandon their extractive activities. The alternatives that call for continued ranching and grazing do not discuss the costs to restore the park from the impacts of ranching-water pollution from manure runoff, loss of natural habitat from grazing, greenhouse gases (cattle are the leading source in the park), and air pollution from cattle operations. Has this been studied by the NPS and what would be the restorative costs when ranching and dairy are stopped in PRNS? 4) What portion of the NPS budget goes to ranching while park improvements, maintenance and public programs and interpretation are unfunded? NPS funds should be going to improving the park for wildlife and the public. Over \$132 million was attributed to tourism at PRNS in 2017. Tourism is more profitable, economically viable and environmentally viable than dairy farming and ranching. 5) Finally this week has included much discussion on climate change and wide participation by youth in the Climate Strike. As the GMP purports to be a plan for the future, what is NPS' position and plan on climate change and why is there no discussion of climate change as it relates to the NPS' preferred alternative and the ongoing and expanded greenhouse gas emissions these operations would generate?

#6237

Name: Cunningham, Debra

Correspondence: I am writing to urge the National Park Service to discontinue the grazing of beef and dairy cattle at Point Reyes National Seashore. This precious area has been damaged by livestock grazing which poses a threat to the environment and local wildlife and it should be protected and used to serve the public good, and not for the benefit of the livestock industry.

I strongly oppose Option B and any other proposal that would be fatal to Tule Elk or other wildlife to the benefit of ranching operations, and encourage the agency to adopt Option F to discontinue grazing and allow members of the public to enjoy this beautiful park and to be enriched with opportunities to visit and appreciate this special place.

#6238

Name: Bancroft, Kim

Correspondence: The Tule Elk are a vital part of the ecosystem and ecotourism of the Pt. Reyes Peninsula. Many of us who come to see the flora and fauna and geographical splendors of the peninsula expect to see the elk as part of our experience, remembering when large herds of them dominated much of California.

Please do not reduce their number in any way. If any creatures should be culled or moved, it should be the cattle, allowing more and more of the peninsula to return to its native state.

Sincerely, Kim Bancroft

#6239

Name: Simms, Pam

Correspondence: These animals are worth saving and should be acknowledged for the NATIONS that they are.

#6240

Name: Kimbauer, Elli

Correspondence: I am writing to urge the National Park Service to discontinue the grazing of beef and dairy cattle at Point Reyes National Seashore. This precious area has been damaged by livestock grazing which poses a threat to the environment and local wildlife and it should be protected and used to serve the public good, and not for the benefit of the livestock industry.

I strongly oppose Option B and any other proposal that would be fatal to Tule Elk or other wildlife to the benefit of ranching operations, and encourage the agency to adopt Option F to discontinue grazing and allow members of the public to enjoy this beautiful park and to be enriched with opportunities to visit and appreciate this special place.

Thank you, Elli Kimbauer

#6241

Name: O'Connor, Deborah

Correspondence: It does not seem right to kill elk for cattle.

#6242

Name: Kuhlmann, Robert

Correspondence: I am writing to urge the National Park Service to discontinue the grazing of beef and dairy cattle at Point Reyes National Seashore. This precious area has been damaged by livestock grazing which poses a threat to the environment and local wildlife and it should be protected and used to serve the public good, and not for the benefit of the livestock industry.

I strongly oppose Option B and any other proposal that would be fatal to Tule Elk or other wildlife to the benefit of ranching operations, and encourage the agency to adopt Option F to discontinue grazing and allow members of the public to enjoy this beautiful park and to be enriched with opportunities to visit and appreciate this special place.

#6243

Name: ives, Susan

Correspondence: September 20, 2019

To: Superintendent Cicely Muldoon Point Reyes National Seashore

Re: Comments to Point Reyes National Seashore GMPA/EIS

I have lived in Marin County, California for more than 40 years and in that time have visited Point Reyes National Seashore regularly for birding, hiking, viewing wildflowers, and photographing wildlife.

I have worked in government and the nonprofit sector, including as Special Assistant to the Secretary of Environmental Affairs for the Commonwealth of Massachusetts; founder of the Massachusetts Environmental Trust; Acting Director of the Greenbelt Movement International; and Vice President for the Trust for Public Land. I currently consult with public agencies, foundations, and nonprofit organizations. Past clients include the Golden Gate National Recreation Area and Point Reyes National Seashore Association. I also served as a volunteer for the GGNRA.

I am saddened and discouraged by the degenerating conditions at Point Reyes National Seashore as a result of decades of year-round cattle grazing. Overgrazed land, barren feedlots, rutted hillsides, fetid manure ponds, polluted waterways, and fenced wildlife are not what one expects nor wants to see in a national park. The deterioration of the natural resources at Point Reyes Seashore reveals a lack of capacity and/or unwillingness on the part of park management to address obvious, ongoing and systemic problems that endanger the biological integrity of the national seashore.

The Draft General Management Plan Amendment and EIS, and the Park Service's "preferred" Alternative B-represent an abdication of the NPS's core mission: to conserve our national parks "by such means as will leave them unimpaired for the enjoyment of future generations. Under the influence of ranching and dairying interests, these fundamental precepts of the National Park Service have been left behind. Ongoing and irreversible impairment of the Seashore is guaranteed.

In Alternative B the NPS gives preference to 18 beef and 6 dairy ranchers over millions of park visitors and has consented to ongoing destructive impacts to the public's land, subsidized at public expense. The NPS's EIS presumes ranching will continue indefinitely, and fails to sufficiently analyze the benefits of retiring and repurposing ranch facilities for public uses.

In the GMPA/EIS the health and biodiversity of national seashore and its two-and-a-half million annual visitors are subjugated to the increasing demands of two-dozen tenant ranchers in these national parks. Neither the Organic Act of 1916 nor the legislation establishing the Point Reyes Seashore, (16 USC Sec 459c) includes language that commits the NPS to ensure the commercial success of private businesses operating in national parks. Leasing the land for ranching at Point Reyes National Seashore is discretionary. Nothing in the legislative record of the Seashore supports the myth of ranching in perpetuity. Specifically stated is that the land should be

"unimpaired for future generations" and that uses be "supportive of the maximum protection, restoration, and preservation of the natural environment within the area (16USC Sec. 459c (6)(a)). Ranching, as conducted at the Point Reyes National Seashore and GGNRA, undermines this mandate.

1. Not discussed in GMPA/EIS: How and when will the NPS set goals for the "maximum protection, restoration, and preservation" of the Seashore and how will progress be measured? What is the timeframe for meeting them? What new or additional management methods will NPS implement to ensure the "maximum protection, restoration, and preservation" of the Seashore, per its legislative mandate? What are the costs of attaining "maximum protection, restoration, and preservation" and what resources has NPS allocated for this purpose?

The GMPA/EIS discusses the many and various environmental impacts of ranching to the Seashore but fails to rate the intensity of these impacts. The public can only guess at the significance of these documented impacts but has no way to know if these impacts are low, moderate or high.

2. Not described in GMPA/EIS: In addition to describing the environmental impacts of ranching to park resources, how does NPS rate those impacts? How will these impacts be mitigated and at what cost?

The economic benefits described in the GMPA/EIS point to a relatively small economic return to the County from the Seashore ranches. It cites the potential loss of fewer than 100 jobs should ranching end.

3. There is no mention in the GMPA/EIS of the working conditions of ranch workers or the notoriously sub-standard housing conditions of workers in the Seashore. Under Alternative B, how will the NPS oversee and improve the working and living conditions for ranch workers? What standards currently exist and how are they maintained?

Ranching is one of many "resources" listed in the NPS's 2019 draft Foundation Document for the Seashore. More than other historic, cultural or natural resources, ranching has been enshrined in the park, and unquestionably consumes park funds and staff resources that could address the Seashore's many unmet needs.

4. The GMPA/EIS does not provide the costs of supporting the ranches, nor the proportion of the budget/staff dedicated to ranching relative to other park resources described in the Foundation Document, which include wilderness, coastal landscapes, marine, estuarine and freshwater environments, diverse habitats and native species, maritime cultural landscapes, continuum of human use (including ranching), opportunities for inspiration and recreation and science and learning. Such analyses are pertinent to the economic impact of increasing support for ranching at the expense of other unmet needs identified for funding.

The NPS has generously subsidized ranches for decades citing its mandate to preserve "historic and cultural resources." In fact, ranching as practiced at the Seashore today bears little resemblance to historical ranching. The NPS has never interpreted the working ranches in the park for park visitors. In fact, the public is unwelcome on ranchlands that we, the public, own. The National Register of Historic Places now includes Seashore ranches. Noteworthy is that the National Register does not require active ranching-let alone on any commercial or industrial scale- as a condition of historic designation. It does, however, convey the expectation that historic structures will be preserved. The addition of modern infrastructure-such as a massive "loafing barn"-raises the concern that the NPS willingly compromises the historic integrity of the ranch districts while claiming to preserve them.

5. By what historic measure is the NPS permitting more than 5,700 beef and dairy cows to graze in the national seashore? How does new infrastructure, such as a "loafing barn," impact the historic integrity of the ranching district? Under what circumstances will the public be afforded an opportunity to comment on impacts of such "improvements" to the ranches? How will the NPS ensure the preservation of historic structures/districts in the future? How will the preservation and interpretation of historic ranches be funded? How and when will the historic ranches be interpreted for the public? The GMPA provides no adaptive reuse plan for structures on

decommissioned ranches. Repurposing historic and cultural structures for public use, interpretation and other visitor benefits needs to be analyzed in under Alternative F.

Conflicts between ranchers and members of the public, and illegal "No Trespassing" signs are well known to the Seashore management. In addition are numerous documented violations of lease agreements and park regulations on the part of ranchers. Documents obtained under FOIA cite violations including overstocking cattle; chasing elk with ATVs and dogs; lack of adequate fences; failure to pay lease fees; refusal to cooperate with NPS's wildlife and rangeland staff; illegal dumping of cattle carcasses in the park; and overallotment of lands for hay and silage. The NPS continues to lease these public lands to these same ranchers and facilitates their entrenchment and expanded imprint on the Seashore.

6. Please explain in the GMPA/EIS whether and how ranching operations are evaluated before renewing or disallowing leases? Has the NPS ever denied a lease for violations or other failures to perform? In what way are ranchers held accountable for lease violations? How many ranches are historically and currently out of compliance? How does the NPS remedy repeat violations? With dwindling budgets and staff, how will the NPS monitor the ranches and enforce lease conditions that are becoming increasingly complex?

Some ranch residences appear unkempt, with cars and other unsightly junk visible to the public.

7. Not discussed in GMPA/EIS: How will the NPS perform its mandate of preserving the scenery of the national park on unkempt leased lands?

Dairy ranches are trampled to bare dirt with mountains of manure visible to park visitors. Dairy operations also raise concerns about animal welfare.

8. Not discussed in alternatives for continued ranching: How will the NPS perform its mandate of preserving the natural resources and scenery on dairy ranches? How does the NPS monitor the ranches to ensure animal welfare? What are the standards for the humane treatment of cattle herds and other proposed domestic livestock in the park? How are these regulations monitored and enforced?

The Seashore is suffering from Congressional budget cuts and insufficient staff.

9. How will the NPS perform the oversight and maintenance required of expanded and more complex ranching operations described in Alternative B? What impact will the demands of Alternative B have on general park maintenance, security, programs or visitor services, compared to the No Ranching, Alternative F?

Diversification of previously unauthorized livestock-pigs, sheep, goats, and up to 500 chickens on each ranch is an unprecedented change in policy. It will impact park wildlife, particularly birds and park predators. This but is insufficiently discussed in the GMPA. Ranch tours, homestays, processing facilities and farm stands for private gain have no place in a national park.

10. The GMPA/EIS fails to address the potential impacts of "diversification" to wildlife? How will these impacts be addressed, and at what cost? The GMPA/EIS is silent on this question, implying a "just trust us" approach. (When asked at the public open house, what the NPS will do should a coyote, bobcat, or fox "take" small livestock, the Seashore's wildlife biologist answered, "We'll see.") There appears to be nothing in the GMPA/EIS that addresses the loss of wildlife to guard dogs or the possible poaching of "nuisance" wildlife, (other than Tule elk). These impacts must be analyzed and considered prior to approving diversification, the benefits of which appears to accrue solely to ranchers by expanding their revenue streams. Further commercializing the park with retail outlets and overnight stay also benefits rancher' bottom line. The GMPA does not describe diversification's potential benefits to the public or to the park's natural resources and wildlife.

The land where confined Tule elk graze is visibly more diverse with native plant species than land grazed by domestic cattle. Yet, consistent in its preference for ranching over wildlife, the NPS bases its analysis on the

maximum number of cattle that can be grazed based on historic conditions (presumably 5,700). It bases the threshold number of native elk (120) on what forage is left after the maximum number of cattle have had their fill. The NPS provides no analysis of the number of elk that could be sustained in the park were there no competition from cattle. Because elk roam and graze more lightly than cattle, theoretically the park could support native Tule elk in numbers greater than the 5,700 cattle it allows in the park. Reportedly, 1,000 elk historically roamed the Point Reyes peninsula.

11. The GMPA/EIS does not provide this alternative analysis: How many elk the park can sustain were no cattle present, is necessary. It would include the number of elk sustainable using historic conditions; how many elk would be needed to control the presumed proliferation of invasive plants to allow the native plants recover over time; NPS recovery goals for native plants, and an accompanying management plan and timeline; and the economic impacts of redirecting funds currently used to subsidize cattle operations to restoring native plants and wildlife.

The Organic Act mandates that the NPS preserve wildlife in the national parks. Yet, native Tule elk at Drakes Beach will be "managed" to 120 solely to accommodate the special interest of private ranching. In addition, any elk foraging on leased lands will be shot because they affect ranchers' profits.

12. Only one alternative in the GMP/EIS is consistent with the Organic Act. That is Alternative F, which would allow elk to expand their range.

The NPS has long tolerated the loss of wildlife and habitats from silage and haying operations to support the cattle operations. According to a 2015 report by Point Blue Conservation Science, "Estimating Impact of Mowing in Silage Fields at Point Reyes N.S. on Breeding Birds," spring mowing macerates ground-nesting birds and small mammals, which attracts ravens and crows. Ravens and crows congregating at the ranches are the leading cause of predation on Snowy plovers, an endangered species that nests on Seashore beaches. The NPS dedicates significant resources to protecting the plovers, but efforts are hampered by predation. Ranching is at odds with the Snowy plover recovery efforts. Current mitigation is proving insufficient and continued failure risks the loss of the endangered species.

13. Though it acknowledges that impacts, including to endangered species, would be removed were ranching discontinued, the GMPA/EIS fails to provide any analysis for its position to perpetuate and expand private ranching. How will the NPS mitigate for impacts that jeopardize the survival of a listed species, including the Snowy plover? Will species recovery efforts include exterminating other native species-raven and crow?

Restoring endangered Coho salmon is the goal of a multi-million dollar, multi-year project on upstream parkland. The survival of the last remaining Coho salmon on California's Central Coast is at risk. Yet, bacterial counts from cow-manure runoff into salmon and steelhead streams threaten the recovery of these and other aquatic species. Currently, state-issued waivers allow ranchers to pollute park streams and estuaries with manure runoff that ultimately degrades bay and marine environments. State water pollution waivers do not absolve the NPS of responsibility to minimize the sources of pollution on federal parklands.

The most effective mitigation would be to discontinue private ranching in the park, which is undermining substantial public investment in the recovery of salmon, steelhead and other aquatic species discussed in the GMPA/EIS.

14. What is the NPS's plan to prevent manure runoff from the park, clean up polluted streams and improve conditions for Coho, steelhead and other threatened aquatic species?

Following the purchase of the ranches, the federal government allowed members of the immediate family of the original ranchers to continue ranching in the park after the life estate or the original rancher expired.

15. Should the immediate family members of original ranchers decline to continue ranching, park ranches must be permanently retired and actively restored for natural resource values and visitor enjoyment.

Under no circumstances should "succession" originally intended only for multi-generational ranching, be extended to other relatives, neighbors, existing, former or current permittees, or others seeking to lease land in the Seashore for livestock grazing.

The GMPA/EIS acknowledges that GHG emissions from cattle exceed those of visitors' vehicles and that methane produced by Seashore cattle has far more potent impacts than other GHGs.

There is no discussion of the NPS's plans for mitigating the climate impacts of the cattle in the park. Impacts of climate change weigh on the park's future-including the survival of rare, threatened and endangered plants and animals. Ignoring climate change mitigation in the GMPA/EIS is unacceptable. Yet, the NPS concludes that any mitigation by Seashore ranchers for their climate impacts is entirely voluntary.

Scientists recently estimated that humanity has twelve years in which to stave off irreversible global temperature rise. The NPS's preoccupation with catering to the demands a single special interest and its political allies ignores this reality.

16. The science is clear. Amidst the stark challenge of climate change and species extinctions, how will the NPS mitigate the GHG caused by Seashore ranches? What can the NPS do to defend our parks from the trend of privatization, exploitation, and degradation by special interests? Future generations will bear the brunt of climate disruption. How will the NPS explain its decision to prop up 24 ranchers rather than stand up for future generations?

Susan Ives

#6244

Name: Sink, Rachel

Correspondence: I urge you to let the rancher's lease expire and remove the cattle from Point Reyes and allow the Tule Elk and other native species to live freely, as they have for all these years.

Thank you, Rachel Sink

#6245

Name: Girard, Janet

Correspondence: This has got to stop. National Parks are not meant for the livestock industry to use and abuse. This land is meant to be wildlife habitat. Period!

#6246

Name: Patterson, Carol

Correspondence: I support Option F. Phase out the ranches. Do not allow any commercial livestock in the park. Prioritize wildlife over domestic cattle. Biodiversity should not be sacrificed to private ranching. Restore wildlife habitat and native plant communities. Historic ranch buildings should be used for scientific research, interpretation and public education.

#6247

Name: galabert, sandra

Correspondence: The preservation of native wild species must take precedence over farming and ranching



activities. You have led this policy for more than 20 years to allow farmers and ranches to settle into the park detrimental to herds of wild animals like elks. Now, we can see that exploitation of resources have provoked natural disasters that have been stronger and more frequent, we should understand there is a risk of extinction for all species include human beings.

So I urge you to change your mind and act in the reversal sense. Show more consideration for nature and wild species as long as you have the time to do it !

Sincerely,

#6248

Name: Smith, Julie

Correspondence: Stop hunting in National Parks!

#6249

Name: N/A, N/A

Correspondence: I am writing to urge the National Park Service to discontinue the grazing of beef and dairy cattle at Point Reyes National Seashore. This precious area has been damaged by livestock grazing which poses a threat to the environment and local wildlife and it should be protected and used to serve the public good, and not for the benefit of the livestock industry.

I strongly oppose Option B and any other proposal that would be fatal to Tule Elk or other wildlife to the benefit of ranching operations, and encourage the agency to adopt Option F to discontinue grazing and allow members of the public to enjoy this beautiful park and to be enriched with opportunities to visit and appreciate this special place.

#6250

Name: Johannsen, Mary

Correspondence: Natural values, native wildlife, public access and enjoyment should take priority over commercial activities at Point Reyes. Tule elk are an important part of the landscape at Point Reyes. Their recovery is a result of successful native ecosystem restoration, which is a key element of the Park Service's mission. It's taken a lot of time, money and effort to restore tule elk to Point Reyes, the only national park where they live. Tule elk should be allowed to roam free and forage in the park - not shot, removed, fenced or treated as problem animals.

#6251

Name: Montapert, Anthony

Correspondence: I urge the National Park Service to discontinue the grazing of beef and dairy cattle at Point Reyes National Seashore. This precious area has been damaged by livestock grazing which poses a threat to the environment and local wildlife and it should be protected and used to serve the public good, and not for the benefit of the livestock industry. I oppose Option B and any other proposal that would be fatal to Tule Elk or other wildlife to the benefit of ranching operations, and encourage the agency to adopt Option F to discontinue grazing and allow members of the public to enjoy this beautiful park and to be enriched with opportunities to visit and appreciate this special place.

#6252

Name: Norwood, Virginie

Correspondence: ...

#6253

Name: Jones, Ashleigh

Correspondence: Please don't kill native tule elk. We need to protect wildlife now more than ever.

#6254

Name: Reid, Leslie

Correspondence: Do not murder the Tule elk at Point Reyes, CA. That would be criminal. They are wondrous creatures. Find another solution.

#6255

Name: Caetano, Mike

Correspondence: I am writing to urge the National Park Service to discontinue the grazing of beef and dairy cattle at Point Reyes National Seashore. This precious area has been damaged by livestock grazing which poses a threat to the environment and local wildlife and it should be protected and used to serve the public good, and not for the benefit of the livestock industry.

I strongly oppose Option B and any other proposal that would be fatal to Tule Elk or other wildlife to the benefit of ranching operations, and encourage the agency to adopt Option F to discontinue grazing and allow members of the public to enjoy this beautiful park and to be enriched with opportunities to visit and appreciate this special place.

#6256

Name: Sheshebor, Niloofar

Correspondence: I support saving wildlife, nature, national parks, oceans, and all animals. This is important to millions of Americans. We need these resources to live a better life.

#6257

Name: Smith, Doreen

Correspondence: I am very familiar with the very special native to Ca. vegetation of Pt Reyes National Seashore. I volunteered monitoring rare species of native plants there for 20 years. There is an impressive number of surviving plant taxa which of course are needed to support all the native animal life there.

Though some ranching practices are fairly harmless to the continuing presence of what remains of our endangered coastal prairie grasslands others are very detrimental resulting in an area becoming nothing but field of weeds. I refer to the spraying of dung-slurry over surrounding acres of field by the dairy ranches there.

I am in favor of phasing-out and eliminating the water-wasting filth-producing dairying. Replacing such ranches' activities with beef cattle (which must also be regulated to preserve native biodiversity) may be an option for them.

Adding to the mess by advocating for such as ploughing for row crops and even pig farming on PORE beggars belief.

Sort of respectfully yours.

Doreen I. Smith, botanist

#6258

Name: Paul, K T

Correspondence: Please reduce or eliminate the cattle and let more room for the elk.

#6259

Name: Grainger, Elizabeth

Correspondence: I have been visiting Pt Reyes for 40 years, first as a young child and then all through my adult life. Pt Reyes has been a favorite place to hike, camp, visit, and enjoy the beauty of our spectacular California natural coast. Point Reyes National Seashore is supposed to be managed under the Point Reyes Act for "maximum protection, restoration, and preservation of the natural environment." There's no mandate for prioritizing commercial agricultural leases on these public lands.

We must prioritize native flora and fauna at Pt Reyes. Planting artichokes or other row crops will attract birds. And introducing sheep, goats, pigs or chickens will attract native predators such as coyotes, bobcats and foxes. Expanded ranching would only create new wildlife conflicts.

Cattle ranching should only be allowed if it's consistent with preserving the natural environment. And agricultural activities such as mowing shouldn't be allowed in park areas where they harm endangered species or wildlife habitat, impair water quality, cause excessive erosion or spread invasive plants/diseases.

Cattle are the seashore's primary source of greenhouse gases. The Park Service's preferred alternative is inconsistent with its own "Climate Friendly Parks" plan.

I hope you will act in ways that protect this natural treasure. Please protect, restore, and preserve Point Reyes!

#6260

Name: Sailor, Lauren

Correspondence: Hello,

I'm writing to support the public access and bicycling improvements outlined under Alternatives B, C, D, E, and F. I've been an urban cyclist for 14 years, and better bicycling is a large part of the reason I relocated to the Bay Area from my former home in Chicago. I currently live in San Francisco but often head to Marin County to take advantage of the great recreational cycling opportunities there, and these improvements will allow even more cyclists to enjoy the area's natural beauty - particularly cyclists who aren't as comfortable cycling next to motor vehicle traffic as I am!

I strongly support proposals that would lead to the planning and implementation of bicycling routes on trails, ranch roads, and pathways throughout the planning area, including but not limited to: 1) a connection between Devil's Gulch and Platform Bridge Road using existing ranch roads, 2) a connection between Bolinas Ridge Trail at Olema Hill and Point Reyes Station to serve as an interim connection for the Cross Marin Trail, 3) a connection between Bolinas Ridge Trail and Five Brooks Stables using existing ranch roads 4) a connection between Drakes Estero and Abbotts Lagoon Trail using existing ranch roads, 5) a connection between Marshall Beach Trailhead and Pierce Point Road using existing ranch roads, and 6) an Estero Trail loop using existing ranch roads. I encourage NPS to collaborate with ranchers and other stakeholders to educate the public and address concerns related to public access on working ranch lands.

The improvements outlined above would enable and encourage me to visit the Seashore more regularly - and by bike, rather than car. I would feel much safer riding in the Seashore and surrounding areas on trails, pathways, and ranch roads, rather than on roads shared with fast-moving vehicular traffic. Bicycling opportunities are currently very limited and fragmented, so any improvements in connectivity and the creation of new loop options would enable me to enjoy more of the Seashore and surrounding areas by bike.

Thank you for your time and consideration!

#6261

Name: Verbeuren, Dirk

Correspondence: I am writing to urge the National Park Service to discontinue the grazing of beef and dairy cattle at Point Reyes National Seashore. This precious area has been damaged by livestock grazing which poses a threat to the environment and local wildlife and it should be protected and used to serve the public good, and not for the benefit of the livestock industry.

I strongly oppose Option B and any other proposal that would be fatal to Tule Elk or other wildlife to the benefit of ranching operations, and encourage the agency to adopt Option F to discontinue grazing and allow members of the public to enjoy this beautiful park and to be enriched with opportunities to visit and appreciate this special place.

#6262

Name: Fischer, Susan

Correspondence: I urge The National Park Service to adopt alternative F to end ranching in Point Reyes National Seashore (PRNS). I do not support NPS's preferred alternative B- -a public land giveaway to ranchers that prioritizes ranching over recreation, wildlife and protecting natural resources. I visit PRNS to see wildlife, not cows. My understanding is that the mission of national parks is to protect native animals and plants, not ranching/dairy interests and cows. More than a century of continued cattle grazing has upset the natural ecosystems of the park. It is disturbing to see the degraded land that has been used for grazing. The alternatives that call for continued ranching and grazing do not discuss the costs to restore the park from the impacts of such practices- -water pollution from manure runoff, loss of natural habitats from grazing, greenhouse gases (cattle are the leading source in the park), air pollution from cattle operations, and wildlife endangered by cattle disease, fencing and habitat loss. What portion of the NPS budget goes to ranching while park improvements, maintenance and public programs and interpretation are unfunded? Dwindling NPS funds should go to improving the park for wildlife and the public. Over \$132 million was attributed to tourism at PRNS in 2017. Tourism is more profitable, economically viable and environmentally viable than dairy farming and ranching. Where in the NPS mission does it state the guarantee of commercial operators (ranching/dairy) a living? These business were well compensated for their land in the 1970s. Alternatives B,C,D and E allow for diversification (planting crops and introducing other farm animals), yet there is no discussion of diversification impacts on the park. I already see the negative impacts on the park areas when viewing destroyed natural habitats. I support an end to ranching and grazing in Point Reyes National Seashore with the adoption of Alternative F to the General Management Plan.

#6263

Name: N/A, N/A

Correspondence: Leave the Tule Elk alone. They have every right to exist. Remove the ranchers.

#6264

Name: Cyzman, Kara

Correspondence: I am writing to urge the National Park Service to discontinue the grazing of beef and dairy cattle at Point Reyes National Seashore. This precious area has been damaged by livestock grazing which poses a threat to the environment and local wildlife and it should be protected and used to serve the public good, and not for the benefit of the livestock industry.

I strongly oppose Option B and any other proposal that would be fatal to the Tule Elk or other wildlife to the benefit of ranching operations, and encourage the agency to adopt Option F to discontinue grazing and allow

members of the public to enjoy this beautiful park and to be enriched with opportunities to visit and appreciate this special place.

#6265

Name: Lee, Eddie

Correspondence: This is a travesty if there ever was one. I have had the distinct privilege of hiking Point Reyes several times and have transversed the areas where the Tule Elk roam free. They are magnificent creatures who neither harm nor bother anyone and this is as much their world as it is ours.

Ultimately, these animals are with us- -not for us- -and any kind of proposal that suggests "culling" the herd to make room for the business of cattlemen and ranchers is odious and repellent not to mention a contributor to global greenhouse gas emissions vis a vis cattle farming. It is the epitome of irresponsible management.

He who has ears, let him hear- -man will always reap what he sows...in this life or the next.

#6266

Name: N/A, N/A

Correspondence: Point Reyes is the only national park where tule elk live. They should be allowed to roam free and forage in the park - not shot, removed, or fenced. Commercial activities at Point Reyes should be required to accommodate wildlife, not take precedence over them. Agricultural activities such as mowing should not be allowed in park areas where they harm endangered species or wildlife habit. Cattle ranching leads to water pollution, declines in fish and bird populations, conflicts with wildlife, and even more greenhouse gas emissions. Please protect tule elk and other species.

#6267

Name: Q, M

Correspondence: I care about protecting California's wildlife. I oppose the National Park Service's plan to kill native tule elk and expand commercial agriculture in Point Reyes National Seashore and Golden Gate National Recreation Area. I urge the National Park Service to instead restore the lands for wild animal habitat.

We should prioritize the preservation of our public lands and wildlife, not the economic interests of private ranchers. These commercial cattle ranches have serious negative environmental impacts on the park - polluting waterways, causing soil erosion, and harming the many endangered and threatened animals who live on Point Reyes. National parks exist to protect our natural resources and native wildlife. This park should be managed accordingly.

#6268

Name: Burns, Lalie

Correspondence: Natural areas should be left untouched and not used for commercial profit.

#6269

Name: Cain, Clarence

Correspondence: Dear NPS,

I'm writing to support the public access and bicycling improvements outlined under Alternatives B, C, D, E, and F. I strongly support proposals that would lead to the planning and implementation of bicycling routes on trails, ranch roads, and pathways throughout the planning area, including but not limited to: 1) a connection between Devil's Gulch and Platform Bridge Road using existing ranch roads, 2) a connection between Bolinas Ridge Trail

at Olema Hill and Point Reyes Station to serve as an interim connection for the Cross Marin Trail, 3) a connection between Bolinas Ridge Trail and Five Brooks Stables using existing ranch roads 4) a connection between Drakes Estero and Abbotts Lagoon Trail using existing ranch roads, 5) a connection between Marshall Beach Trailhead and Pierce Point Road using existing ranch roads, and 6) an Estero Trail loop using existing ranch roads. I encourage NPS to collaborate with ranchers and other stakeholders to educate the public and address concerns related to public access on working ranch lands.

The improvements outlined above would enable and encourage me to visit the Seashore more regularly-and by bike, rather than car. I would feel much safer riding in the Seashore and surrounding areas on trails, pathways, and ranch roads, rather than on roads shared with fast-moving vehicular traffic. Bicycling opportunities are currently very limited and fragmented, so any improvements in connectivity and the creation of new loop options would enable me to enjoy more of the Seashore and surrounding areas by bike.

Thank you very much, Clarence Cain

#6270

Name: Sumida, Kathleen

Correspondence: I am writing to urge the National Park Service to discontinue the grazing of beef and dairy cattle at Point Reyes National Seashore. This precious area has been damaged by livestock grazing which poses a threat to the environment and local wildlife and it should be protected and used to serve the public good, and not for the benefit of the livestock industry.

I strongly oppose Option B and any other proposal that would be fatal to Tule Elk or other wildlife to the benefit of ranching operations, and encourage the agency to adopt Option F to discontinue grazing and allow members of the public to enjoy this beautiful park and to be enriched with opportunities to visit and appreciate this special place.

#6271

Name: Mueller, Joy

Correspondence: I have been visiting Pt Reyes since 1974 and love the wild spaces and beaches. I was excited about the addition of native Tule Elk. I believe the dairy ranchers hold a heritage place at the park, but only as dairy ranchers. They were supposed to gradually age out of their rights to ranch as originally written in the park plan. Their cattle have infected the elk with John's disease, making them unsuitable for moving to other areas. Now you are suggesting we allow other non-native plants and animals into this pristine parkland! What other diseases will they introduce? I don't want to see farmland and smell hog farms when I visit Pt. Reyes. This park is our land paid for with our tax dollars. As a veterinarian, I know how easily diseases spread, and non-native plants escape and become nuisances. You should not be allowed to grant additional farming rights to dairy ranchers who should not still be there in the first place! If they can't make a living with dairy, then they should close down their ranches. I am highly opposed to expanding farming at Pt. Reyes. We are being generous allowing the ranchers to stay beyond their allotted time and contracts. Sincerely, Joy Mueller, DVM, CVMMP

#6272

Name: Fallon, Kelley

Correspondence: Option F

Too many cows cause erosion and excess manure that spoils the Park, and this will be worse with longer leases and expanded uses. Our Parks are paid for by the public, and should be available in an unadulterated form to us.

#6273

Name: Woods, Debbie

Correspondence: Dear national Park Service,

Please think before killing those beautiful Elk. I strongly oppose Option B and any other proposal that would be fatal to Tule Elk or other wildlife to the benefit of ranching operations.

California is the best state because of the way it treats its natural environment and wildlife. Also please adopt Option F and end livestock grazing at Point Reyes National Park and allow this precious land to remain as wildlife habitat and to be used for the public good, not for the benefit of the livestock industry.

There are a lot of people who rely on this beautiful area to recoup from hard weeks at work. Opening the land up for farmers to graze cattle who will be killed for food or forced to breed for milk (I am a vegetarian and find this repulsive) is so wrong on so many levels. It also adds to the air pollution and climate change that we must stop before it is too late.

Thank you for considering what I have written. I am speaking out for the wildlife who are voiceless! I pray you do the right thing and adopt Option F,

Debbie Woods

#6274

Name: Hyland, Cordelia

Correspondence: Please move for Alternative F: No ranching on the National Seashore. Based on climate change that we know is happening, it doesn't seem reasonable to continue or expand ranching on NPS. Through the lens of climate change, wildlife impacts, the cost of ranching, all alternatives beyond F do not make sense.

The EIS shows that the National Seashore's land would benefit if we stop ranching on the seashore. For all of the proposals apart from F, there is no plan for protecting wildlife from ranching's impacts or mitigating habitat loss from cattle grazing or growing crops.

#6275

Name: Schulte, Whitney

Correspondence: Please protect the Tule Elk and end the environmental devastation caused by ranching.

#6276

Name: Nazzaro, Patricia

Correspondence: Why are you supporting cattle ranching over the protection of the Tule Elk? Cattle ranching does so much damage to all of the environment and should not take preference over the Tule Elk, they are in their natural home and should not be pushed out. Anything that is done in a National Park should be in balance with nature and the animals and wildlife should always come first and be treated with respect. My family and I would visit a National Park to see nature and the native wildlife, not things that don't belong there.

Thank you for your time.

#6277

Name: brady, karen

Correspondence: We need to help the animals who need help

#6278

Name: Bautista , Maria

Correspondence: Please help our environment

#6279

Name: Quest, Donna

Correspondence: I strongly oppose Option B and any other proposal that would be fatal to Tule Elk or other wildlife to the benefit of ranching operations, and encourage the agency to adopt Option F to discontinue grazing and allow members of the public to enjoy this beautiful park and to be enriched with opportunities to visit and appreciate this special place.

#6280

Name: Spute, Janice

Correspondence: I am writing to urge the National Park Service to discontinue the grazing of beef and dairy cattle at Point Reyes National Seashore. This precious area has been damaged by livestock grazing which poses a threat to the environment and local wildlife and it should be protected and used to serve the public good, and not for the benefit of the livestock industry.

I strongly oppose Option B and any other proposal that would be fatal to Tule Elk or other wildlife to the benefit of ranching operations, and encourage the agency to adopt Option F to discontinue grazing and allow members of the public to enjoy this beautiful park and to be enriched with opportunities to visit and appreciate this special place.

#6281

Name: Villalba, Gabrielle

Correspondence: Stop killing the animals. Your job is to protect our environment not businesses.

#6282

Name: Mangels, Francis

Correspondence: I am absolutely opposed to all cattle grazing on public lands. Do not subsidize cows. As a USFS range manager for 35 years, the proposal to increase cow grazing is a very big mistake, not just an economic boondoggle, but stupid economics and scientific absurdity.

Leave it for the elk and proper watershed mgmt. NO COWS!!!!

#6283

Name: Kommerstad-Reiche, Carol

Correspondence: The animal agriculture industry has routinely taken advantage of preferential access to land, water, and other resources, and that is currently the case in Point Reyes National Seashore in Marin County, CA. Over 5,000 cattle who are being exploited for beef and dairy production are grazing in the public park, and pose a threat to the environment, wildlife, and the public good.\*

The ranchers' leases are set to expire, and the National Park Service (NPS) is, shockingly, considering several proposals include killing the native Tule Elk in order to continue grazing livestock. I respectfully urge the NPS to end livestock grazing at Point Reyes National Park, to allow this precious land to remain as wildlife habitat and to be used for the public good, not for the benefit of the livestock industry.



With Thanks,

Mrs. Carol M. Kommerstad-Reiche

#6284

Name: Gerstein, Douglas

Correspondence: The tule elk herds must be preserved. The NPS and the ranchers must devise better separation between the cattle and the elk.

#6285

Name: N/A, N/A

Correspondence: I am writing to urge the National Park Service to discontinue the grazing of beef and dairy cattle at Point Reyes National Seashore. This precious area has been damaged by livestock grazing which poses a threat to the environment and local wildlife and it should be protected and used to serve the public good, and not for the benefit of the livestock industry.

I strongly oppose Option B and any other proposal that would be fatal to Tule Elk or other wildlife to the benefit of ranching operations, and encourage the agency to adopt Option F to discontinue grazing and allow members of the public to enjoy this beautiful park and to be enriched with opportunities to visit and appreciate this special place.

#6286

Name: goncarovs, sandy

Correspondence: We are at a point where the climate crisis is a top priority and should be particularly so for a federal agency like the National Park Service that is widely relied upon to maintain healthy environments and natural resources. Disappointingly, the priority of your agency appears to be profit over the protection of the Tule elk, and therefore other wildlife populations as part of the cascading effect of using lethal means to decrease the already small number of Tule elk we have left. The people of this planet are standing up and protesting against the decimation of this planet and everything on it. We won't stand for it any more.

#6287

Name: N/A, N/A

Correspondence: I am writing to urge the National Park Service to discontinue the grazing of beef and dairy cattle at Point Reyes National Seashore. This precious area has been damaged by livestock grazing which poses a threat to the environment and local wildlife and it should be protected and used to serve the public good, and not for the benefit of the livestock industry.

I strongly oppose Option B and any other proposal that would be fatal to Tule Elk or other wildlife to the benefit of ranching operations, and encourage the agency to adopt Option F to discontinue grazing and allow members of the public to enjoy this beautiful park and to be enriched with opportunities to visit and appreciate this special place.

#6288

Name: Wahl, Lynn

Correspondence: WHY I OPPOSE ALTERNATIVE B

I am strongly opposed to Alternative B, the NPS Preferred Alternative as outlined in the Proposed Amendments to the General Management Plan. Alternative B proposes granting 20-year leases for all existing ranching and dairy

operations, and moreover, expanding agricultural uses within the ranch core zone. This alternative does not give adequate consideration to the negative environmental impacts to soil, water, vegetation, and wildlife of dairy and cattle ranching identified in the NPS' own Environmental Impact Statement (see pp vi - ix). In my opinion, Alternative B gives far too much weight to the historic value of preserving the 24 ranching and dairy operations at the expense of the natural environment and the visitor experience.

Alternative B allows continued grazing on range land containing documented sensitive resource areas including rare plants, wetlands, riparian/stream and pond habitats; this does not seem to conform to the mission of the NPS. To protect the water quality of Drakes Estero the oyster farm's lease was not renewed. It seems inconsistent that the NPS Preferred Alternative is that ranching leases should be renewed in the same area which undoubtedly degrades the water quality in the Estero.

When Point Reyes National Seashore was established the NPS purchased the land from ranching families who in many cases have continued to ranch under time-limited reservations of use and occupancy, and agricultural use leases. These leases benefit the 24 ranching operations within the park, not only to the detriment of the environment as discussed above, but to the visitor experience.

I volunteer at the information desk at the Bear Valley Visitor Center. I have never once had a visitor ask me about observing or experiencing historic ranching or dairy operations. Every visitor I have spoken to has come to the Park to enjoy its splendid natural beauty either by hiking, biking, kayaking or simply driving through the varied landscapes. I understand that the NPS is charged with protecting natural AND historic resources, and I appreciate the historic nature of ranching in West Marin. However, there are many dairy and ranching operations in West Marin outside of parklands. Furthermore, much of this land is protected by the Marin Agricultural Land Trust which helps insure that ranching and dairy operations will continue in West Marin.

As pointed out in the EIS the visitor experience would be enhanced if ranching and dairying operations were phased out, by opening up opportunities to develop new connecting trails, including multi-use trails. I believe that the adaptive reuse of historic ranch structures is an excellent idea that could definitely expand and enhance the visitor experience, as well as potentially benefit non-profit and research organizations.

In my opinion it is past time for the NPS to begin phasing out (or at the very least severely curtail) ranching and dairy operations on parkland that was purchased long ago by the taxpayers. PRNS should be managed to conserve natural and historic resources for the enjoyment of current and future generations, and not for the benefit of a small number of ranching and dairy operations which clearly degrade the natural environment and limit the visitor experience.

Lynn Wahl

#6289

Name: Fox, Susan

Correspondence: As a National Park, it is imperative that you protect the wildlife above all else! Like what was done with the Oyster Farms, cattle should not impact the abundance of the health of the ecosystem! Remove Dairy farm grants and open up more space to the Elk! Don't shoot ELK, remove cows!!!

#6290

Name: Medrano, Daniel

Correspondence: I am writing to urge the National Park Service to discontinue the grazing of beef and dairy cattle at Point Reyes National Seashore. This precious area has been damaged by livestock grazing which poses a threat to the environment and local wildlife and it should be protected and used to serve the public good, and not for the benefit of the livestock industry.

I strongly oppose Option B and any other proposal that would be fatal to Tule Elk or other wildlife to the benefit of ranching operations, and encourage the agency to adopt Option F to discontinue grazing and allow members of the public to enjoy this beautiful park and to be enriched with opportunities to visit and appreciate this special place.

#6291

Name: N/A, N/A

Correspondence: Good evening,

I just want to leave a comment that I am in favor of wanting to preserve the National Park for wildlife rather than commercial farming for ranchers. I do not think the Elk should be killed to benefit commercial ranchers or relocated. The land should be preserved for the wildlife and protected as a national seashore.

Thank you, Alfred Pisciotta

#6292

Name: yguico, erlinda

Correspondence: THESE DEFENSELESS WILDLIFES NEED EVERYBODY'S COOPERATION TO PROTECT THEM FROM ANY KIND OF HARM.

#6293

Name: N/A, N/A

Correspondence: I am writing to urge the National Park Service to discontinue the grazing of beef and dairy cattle at Point Reyes National Seashore. This precious area has been damaged by livestock grazing which poses a threat to the environment and local wildlife and it should be protected and used to serve the public good, and not for the benefit of the livestock industry.

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#6294

Name: N/A, Andres

Correspondence: To National Park Service:

I'm writing to support the public access and bicycling improvements outlined under Alternatives B, C, D, E, and F. I strongly support proposals that would lead to the planning and implementation of bicycling routes on trails, ranch roads, and pathways throughout the planning area, including but not limited to: 1) a connection between Devil's Gulch and Platform Bridge Road using existing ranch roads, 2) a connection between Bolinas Ridge Trail at Olema Hill and Point Reyes Station to serve as an interim connection for the Cross Marin Trail, 3) a connection between Bolinas Ridge Trail and Five Brooks Stables using existing ranch roads 4) a connection between Drakes Estero and Abbotts Lagoon Trail using existing ranch roads, 5) a connection between Marshall Beach Trailhead and Pierce Point Road using existing ranch roads, and 6) an Estero Trail loop using existing ranch roads. I encourage NPS to collaborate with ranchers and other stakeholders to educate the public and address concerns related to public access on working ranch lands.

The improvements outlined above would enable and encourage me to visit the Seashore more regularly-and by bike, rather than car. I would feel much safer riding in the Seashore and surrounding areas on trails, pathways, and ranch roads, rather than on roads shared with fast-moving vehicular traffic. Bicycling opportunities are currently very limited and fragmented, so any improvements in connectivity and the creation of new loop options would enable me to enjoy more of the Seashore and surrounding areas by bike.

Sincerely, Andres

#6295

Name: Adams, David

Correspondence: Natural values, native wildlife, public access and enjoyment should take priority over commercial activities at Point Reyes. These are the primary reasons I visit it. To me, tule elk are an important part of the landscape at Point Reyes. Their recovery seems to be a result of successful native environment restoration, a key component of the Park Service's mission that I appreciate. It's taken many years to restore tule elk to Point Reyes, the only national park where they live. The elk should be allowed to roam free and forage in the park - not removed, fenced, shot, or treated as nuisance animals in comparison with cattle ranching or agriculture, which must be considered secondary activities to the park's primary purpose. Right now the Point Reyes ranches enjoy not only subsidized grazing fees and housing, but also taxpayer-funded infrastructure and road improvements, and publicly funded projects. These commercial activities at Point Reyes should be required to accommodate native wildlife - not the other way around.

#6296

Name: Parsons, Amy

Correspondence: Expanding agriculture into these areas will destroy habitat for many wildlife species and it will leave our waterways open to agricultural pollution. It is in everyone's best interest to protect this land from development.

#6297

Name: N/A, N/A

Correspondence: I am writing to urge the National Park Service to discontinue the grazing of beef and dairy cattle at Point Reyes National Seashore. This precious area has been damaged by livestock grazing which poses a threat to the environment and local wildlife and it should be protected and used to serve the public good, and not for the benefit of the livestock industry.

I strongly oppose Option B and any other proposal that would be fatal to Tule Elk or other wildlife to the benefit of ranching operations, and encourage the agency to adopt Option F to discontinue grazing and allow members of the public to enjoy this beautiful park and to be enriched with opportunities to visit and appreciate this special place.

#6298

Name: Oblinger, Jackie

Correspondence: Please consider Alternative F when deciding the fate of the elk in the Point Reyes National Seashore. I have personally gone to Point Reyes on vacation and one of the highlights of our trip was to see all the wildlife there. Elk are native to the area and have been there for over 40 years since they were reintroduced. The preservation of wild species is vital in ensuring this beautiful area can be enjoyed by many for years to come. Thank you for your time.

#6299

Name: Schultz, Bob

Correspondence: I'm writing to support the public access and bicycling improvements outlined under Alternatives B, C, D, E, and F. I strongly support proposals that would lead to the planning and implementation of bicycling routes on trails, ranch roads, and pathways throughout the planning area, including but not limited to: 1) a connection between Devil's Gulch and Platform Bridge Road using existing ranch roads, 2) a connection between Bolinas Ridge Trail at Olema Hill and Point Reyes Station to serve as an interim connection for the Cross Marin Trail, 3) a connection between Bolinas Ridge Trail and Five Brooks Stables using existing ranch roads 4) a connection between Drakes Estero and Abbotts Lagoon Trail using existing ranch roads, 5) a connection between Marshall Beach Trailhead and Pierce Point Road using existing ranch roads, and 6) an Estero Trail loop using existing ranch roads. I encourage NPS to collaborate with ranchers and other stakeholders to educate the public and address concerns related to public access on working ranch lands.

The improvements outlined above would enable and encourage me to visit the Seashore more regularly-and by bike, rather than car. I would feel much safer riding in the Seashore and surrounding areas on trails, pathways, and ranch roads, rather than on roads shared with fast-moving vehicular traffic. Bicycling opportunities are currently very limited and fragmented, so any improvements in connectivity and the creation of new loop options would enable me to enjoy more of the Seashore and surrounding areas by bike.

#6300

Name: Zamora , Rocio

Correspondence: Let's protect our wild life.

#6301

Name: Jacob, Ron

Correspondence: I urge you to adopt Alternative F, which would discontinue farming and ranching opportunities in the park and expand visitor opportunities. The preservation of native wild species must take precedence over farming and ranching activities. I wish to remind you that grazing negatively affects ecosystems, causing water pollution and soil erosion, spreading invasive species and disease, and harming endangered species.

#6302

Name: Stewart, Christine

Correspondence: I am writing to urge the National Park Service to discontinue the grazing of beef and dairy cattle at Point Reyes National Seashore. This precious area has been damaged by livestock grazing which poses a threat to the environment and local wildlife and it should be protected and used to serve the public good, and not for the benefit of the livestock industry.

I strongly oppose Option B and any other proposal that would be fatal to Tule Elk or other wildlife to the benefit of ranching operations, and encourage the agency to adopt Option F to discontinue grazing and allow members of the public to enjoy this beautiful park and to be enriched with opportunities to visit and appreciate this special place. Thank you for your time.

#6303

Name: Wakefield, Marie

Correspondence: The tule elk are down to about 1% of their natural population,The concentration really needs to be on preserving the natural resources. Cows are not natural. Tule elk are natural.

The free-roaming Drakes Beach herd has caused headaches for ranch operations in the past, eating pastureland needed by ranchers to meet organic standards, damaging fencing and injuring cattle. The impact from cattle

ranching leads to soil erosion, water pollution, invasive plants, declines in fish and bird populations, conflicts with wildlife, and contribute to greenhouse gas emissions.

The ranchers are NOT a cultural resource in the park which NPS is obligated to protect; Another argument against the ranch lands is that after the park was established in the 1960s by Congress, the ranch lands were meant to eventually be phased out.

Disappointingly, the priority of this agency appears to be profit over the protection of the Tule elk, and therefore other wildlife populations as part of the cascading effect of using lethal means to decrease the already small number of Tule elk we have left.

#6304

Name: N/A, N/A

Correspondence: I think it is outrageous to even consider killing off an endangered species like the Tule elk just to support cattle grazing. Even Burger King has a plant-based burger (the Impossible Whopper)- If a major fast food chain can offer a burger that is NOT made from beef, I am pretty sure that the majority of Americans would agree, that Tule elk should be protected, NOT cattle!

#6305

Name: Nelson, Kirsten

Correspondence: Support the needs of the Tule Elk. Preserve and protect their habitat.

#6306

Name: Markovich , Darlene

Correspondence: Please curtail ranching in favor of natural wildlife

#6307

Name: Williams, Marcy

Correspondence: The tule elk are native to Point Reyes. They shape the landscape around them as they did for centuries before they were extirpated by humans. They have close family units this is their land not yours. The dairy and meat industry is a dirty one bad for the environment and humans. Marcy Williams

#6308

Name: N/A, N/A

Correspondence: I am writing to urge the National Park Service to discontinue the grazing of beef and dairy cattle at Point Reyes National Seashore. This precious area has been damaged by livestock grazing which poses a threat to the environment and local wildlife and it should be protected and used to serve the public good, and not for the benefit of the livestock industry.

I strongly oppose Option B and any other proposal that would be fatal to Tule Elk or other wildlife to the benefit of ranching operations, and encourage the agency to adopt Option F to discontinue grazing and allow members of the public to enjoy this beautiful park and to be enriched with opportunities to visit and appreciate this special place.

As someone who works in beautiful Marin county and enjoys the beauty of nature, I urge the National Park Service to put wildlife and the environment first. Protect the beauty of nature and allow wildlife to remain in in the area.

#6309

Name: Canright, Rebecca

Correspondence: Hi there, I am a college student who cares about protecting incredible wild species. I believe that Tule elk are an important part of the landscape at Point Reyes. Their recovery is a result of successful native ecosystem restoration, which is a key element of the Park Service's mission. It's taken a lot of time, money and effort to restore tule elk to Point Reyes, the only national park where they live. Tule elk should be allowed to roam free and forage in the park - not shot, removed, fenced or treated as problem animals. Right now the Point Reyes ranches enjoy not only subsidized grazing fees and housing, but also taxpayer-funded infrastructure and road improvements, and publicly funded projects. But commercial activities at Point Reyes should be required to accommodate native wildlife - not the other way around. Thank you, Rebecca

#6310

Name: Hansen, Amy

Correspondence: Hello, I am a mother who cherishes the wildlife and plants around parks like Point Reyes. The Park Service shouldn't allow any new agricultural activities at Point Reyes. Planting artichokes or other row crops will attract birds. And introducing sheep, goats, pigs or chickens will attract native predators such as coyotes, bobcats and foxes. Expanded ranching would only create new wildlife conflicts. Cattle ranching should only be allowed if it's consistent with preserving the natural environment. And agricultural activities such as mowing shouldn't be allowed in park areas where they harm endangered species or wildlife habitat, impair water quality, cause excessive erosion or spread invasive plants/diseases. Cattle are the seashore's primary source of greenhouse gases. So the Park Service's preferred alternative is inconsistent with its own "Climate Friendly Parks" plan.

I appreciate your time and kind consideration! Amy Hansen

#6311

Name: Canright, Mark

Correspondence: Greetings! I am a farmer who cares deeply about protecting our ecosystems. Point Reyes National Seashore is supposed to be managed under the Point Reyes Act for "maximum protection, restoration, and preservation of the natural environment." There's no mandate for prioritizing commercial agricultural leases on these public lands. Natural values, native wildlife, public access and enjoyment should take priority over commercial activities at Point Reyes. Have a great day, Mark Canright

#6312

Name: Dacher, Jessica

Correspondence: I am writing to urge the National Park Service to discontinue the grazing of beef and dairy cattle at Point Reyes National Seashore. This precious area has been damaged by livestock grazing which poses a threat to the environment and local wildlife and it should be protected and used to serve the public good, and not for the benefit of the livestock industry.

I strongly oppose Option B and any other proposal that would be fatal to Tule Elk or other wildlife to the benefit of ranching operations, and encourage the agency to adopt Option F to discontinue grazing and allow members of the public to enjoy this beautiful park and to be enriched with opportunities to visit and appreciate this special place.

#6313

Name: N/A, N/A

Correspondence: As a retired USDA grazing manager, looking at the history of grazing with BLM and USFS for 35

years, I find both outfits are relatively incompetent in their range analysis and always overstock and under-administer. The area, in my professional analysis, is best suited for wildlife and wild area.

It is also unsuitable for cattle. It has the wrong mix of grazing species, and cows will neglect some and kill their preferred species by overgrazing.

The income generated by leasing will not cover the cost of administration of the permits. Not here, and it never has in 35 years of permit management. This waste of taxpayer's money should not, NOT be initiated

Francis Mangels, retired USFS range officer

#6314

Name: Rodarte, MaryKay

Correspondence: Our parks should be used by wildlife not ranching. This small herd of elk should have priority.

#6315

Name: Wall, Courtney

Correspondence: Wildlife must stay protected over agricultural wants.

#6316

Name: N/A, N/A

Correspondence: Discuss how wildlife and natural scenery motivate you to visit Point Reyes and other national parks. Point Reyes National Seashore is supposed to be managed under the Point Reyes Act for "maximum protection, restoration, and preservation of the natural environment." There's no mandate for prioritizing commercial agricultural leases on these public lands. Natural values, native wildlife, public access and enjoyment should take priority over commercial activities at Point Reyes. Tule elk are an important part of the landscape at Point Reyes. Their recovery is a result of successful native ecosystem restoration, which is a key element of the Park Service's mission. It's taken a lot of time, money and effort to restore tule elk to Point Reyes, the only national park where they live. Tule elk should be allowed to roam free and forage in the park - not shot, removed, fenced or treated as problem animals. Right now the Point Reyes ranches enjoy not only subsidized grazing fees and housing, but also taxpayer-funded infrastructure and road improvements, and publicly funded projects. But commercial activities at Point Reyes should be required to accommodate native wildlife - not the other way around. The Park Service shouldn't allow any new agricultural activities at Point Reyes. Planting artichokes or other row crops will attract birds. And introducing sheep, goats, pigs or chickens will attract native predators such as coyotes, bobcats and foxes. Expanded ranching would only create new wildlife conflicts. Cattle ranching should only be allowed if it's consistent with preserving the natural environment. And agricultural activities such as mowing shouldn't be allowed in park areas where they harm endangered species or wildlife habitat, impair water quality, cause excessive erosion or spread invasive plants/diseases. Cattle are the seashore's primary source of greenhouse gases. So the Park Service's preferred alternative is inconsistent with its own "Climate Friendly Parks" plan.

#6317

Name: HEMINGWAY, Carol

Correspondence: Stay out of Point Reyes with animal farming.

#6318



Name: N/A, N/A

Correspondence: Don't kill

#6319

Name: Tiburzi, Cheryl

Correspondence: I am writing to urge the National Park Service to discontinue the grazing of beef and dairy cattle at Point Reyes National Seashore. This precious area has been damaged by livestock grazing which poses a threat to the environment and local wildlife and it should be protected and used to serve the public good, and not for the benefit of the livestock industry.

I strongly oppose Option B and any other proposal that would be fatal to Tule Elk or other wildlife to the benefit of ranching operations, and encourage the agency to adopt Option F to discontinue grazing and allow members of the public to enjoy this beautiful park and to be enriched with opportunities to visit and appreciate this special place.

I enjoy both hiking the trails and horseback riding, and spending time along the beach. It is always a thrill to encounter native wildlife such as tule elk, and to know that they are safe and will thrive along our shores. I strongly oppose the grazing of beef and dairy cattle on our public lands, and am horrified to hear of a proposal that would actually harm them, for the benefit of private ranchers and cattle. I urge your support to return this magnificent area back to native wildlife and minimal recreational use.

Thank you.

#6320

Name: Fertig, Asano

Correspondence: Do not slaughter the Tule Elk at Pt.Reyes National Seashore. Wildlife should take precedence over cattle at this National Seashore.

#6321

Name: Muse, Jane

Correspondence: Regarding alternatives A-F, why is there no alternative to manage both the tule elk and the cattle? Option A - do nothing appears to have evolved to an unmanageable state and the reasons why are not because of the tule elk. Let us address the reasons for the problems the volume of cattle causes, and implement a solution based on those reasons. That would be reasonable and fair. The focus should be on restoring the damage done by the cattle to the soil, and to plant trees. In addition, the national park service should address the co2 in environment due to dairy and beef industries.

To solve the problems of soil erosion, toxic water and degradation of plants and trees, the park service's preference is to handle that with lethal removal of the elk, hence alternatives B, C, D. But again, the elk are not the cause of the problems.

Other than do nothing, alternative A, the 2 alternatives that allow the elk to flourish without limitation of population growth are E that proposes to eliminate the dairy ranches and F that proposes elimination of all ranching.

Why is there no alternative offered for modifying management of the dairy ranches that have outgrown their place in a national park? Some ideas I can think of include drastically reducing the population of cattle and cleaning up the land that the presence of the cattle has destroyed. This would include focusing efforts on restoring the land that has been damaged by populations of cattle that is too large to be sustained in a healthy environment in a

national park that also supports local native plants and animals including the elk. If this plan cannot be implemented successfully then it may be required to remove the cattle, via alternative E or F.

The 2 alternatives for the cattle are to do nothing or for ranching to cease to exist. Is there a reason managing of cattle population to more environmentally sustainable levels is not offered as a solution? The dairy cattle are popular with the community and so are the tule elk, so a goal for both to co-exist and thrive really needs to be offered to the public in order to be fair. I assume you are serving the public with equal importance, if not more, than the ranchers. Know that the growth, preservation and protection of the tule elk is very important to the public.

I am strongly opposed to lethally removing the elk so there is more grazing land for the cattle. I support reducing the cattle population and restoring the land destroyed by the presence of the cattle so that the 2 can coexist. Since there is not an alternative for this, I support options E and F to remove the dairy and beef cows. I urge you to create a new alternative G to reduce the cattle population. The population of the cattle must be held in check in any case or more land and soil will be destroyed. Your solution B does not have benefits that do anything to minimize the environmental impact that the cattle population causes.

#6322

Name: Cooley, Paul

Correspondence: I have visited Point Reyes, once bicycling through and once on a boat trip with a friend. It is a part of the natural beauty of the California coast. Cattle ranching is not a part of that and if allowed it will continue to damage the environment and local natural resources in many ways, affecting water quality, the plant and animal community already there, and the soil. Please provide a supplemental draft EIR that has ranching alternatives that do not conflict with the natural resources.

#6323

Name: Long, John

Correspondence: I am writing to urge the National Park Service to discontinue the grazing of beef and dairy cattle at Point Reyes National Seashore. This precious area has been damaged by livestock grazing which poses a threat to the environment and local wildlife and it should be protected and used to serve the public good, and not for the benefit of the livestock industry.

I strongly oppose Option B and any other proposal that would be fatal to Tule Elk or other wildlife to the benefit of ranching operations, and encourage the agency to adopt Option F to discontinue grazing and allow members of the public to enjoy this beautiful park and to be enriched with opportunities to visit and appreciate this special place.

#6324

Name: Wisch, N/A

Correspondence: -Wildlife and natural scenery motivate you to visit Point Reyes and other national parks.

-Point Reyes National Seashore is supposed to be managed under the Point Reyes Act for "maximum protection, restoration, and preservation of the natural environment." There's no mandate for prioritizing commercial agricultural leases on these public lands. Natural values, native wildlife, public access and enjoyment should take priority over commercial activities at Point Reyes.

-Tule elk are an important part of the landscape at Point Reyes. Their recovery is a result of successful native ecosystem restoration, which is a key element of the Park Service's mission. It's taken a lot of time, money and effort to restore tule elk to Point Reyes, the only national park where they live. Tule elk should be allowed to roam free and forage in the park - not shot, removed, fenced or treated as problem animals. Right now the Point Reyes

ranches enjoy not only subsidized grazing fees and housing, but also taxpayer-funded infrastructure and road improvements, and publicly funded projects. But commercial activities at Point Reyes should be required to accommodate native wildlife - not the other way around.

-The Park Service shouldn't allow any new agricultural activities at Point Reyes. Planting artichokes or other row crops will attract birds. And introducing sheep, goats, pigs or chickens will attract native predators such as coyotes, bobcats and foxes. Expanded ranching would only create new wildlife conflicts.

-Cattle ranching should only be allowed if it's consistent with preserving the natural environment. And agricultural activities such as mowing shouldn't be allowed in park areas where they harm endangered species or wildlife habitat, impair water quality, cause excessive erosion or spread invasive plants/diseases.

-Cattle are the seashore's primary source of greenhouse gases. So the Park Service's preferred alternative is inconsistent with its own "Climate Friendly Parks" plan.

#6325

Name: BOSTIC, MARTY

Correspondence: The Point Reyes National Seashore General Management Plan Amendment and Environmental Impact Statement is proposing to dedicate one third of Point Reyes National Seashore to cattle ranching and includes plans to kill off Tule elk that frequent the area. This plan only benefits twenty-four cattle ranchers who sold their land to the public 60 years ago, but still use the national park to graze their cattle.

Tule elk are an important part of the landscape at Point Reyes. Their recovery is a result of successful native ecosystem restoration, which is a key element of the Park Service's mission. It's taken a lot of time, money and effort to restore tule elk to Point Reyes, the only national park where they live. Tule elk should be allowed to roam free and forage in the park - not shot, removed, fenced or treated as problem animals.

Cattle ranching should only be allowed if it's consistent with preserving the natural environment. And agricultural activities such as mowing shouldn't be allowed in park areas where they harm endangered species or wildlife habitat, impair water quality, cause excessive erosion or spread invasive plants/diseases.

Point Reyes National Seashore is supposed to be managed under the Point Reyes Act for "maximum protection, restoration, and preservation of the natural environment." There's no mandate for prioritizing commercial agricultural leases on these public lands.

Sincerely,

M. Bostic.

#6326

Name: Lingrell, Hannah

Correspondence: Please do not kill the native elk. It's simply not right. How can the Park Service spend our tax dollars on this? Completely and utterly immoral, greedy, and corrupt.

#6327

Name: Dunn, Kelly

Correspondence: I love hiking and watching wildlife! Protect our precious iconic essential wildlife!

Point Reyes National Seashore is supposed to be managed under the Point Reyes Act for "maximum protection, restoration, and preservation of the natural environment." There's no mandate for prioritizing commercial

agricultural leases on these public lands. Natural values, native wildlife, public access and enjoyment should take priority over commercial activities at Point Reyes. Tule elk are an important part of the landscape at Point Reyes. Their recovery is a result of successful native ecosystem restoration, which is a key element of the Park Service's mission. It's taken a lot of time, money and effort to restore tule elk to Point Reyes, the only national park where they live. Tule elk should be allowed to roam free and forage in the park - not shot, removed, fenced or treated as problem animals. Right now the Point Reyes ranches enjoy not only subsidized grazing fees and housing, but also taxpayer-funded infrastructure and road improvements, and publicly funded projects. But commercial activities at Point Reyes should be required to accommodate native wildlife - not the other way around. The Park Service shouldn't allow any new agricultural activities at Point Reyes. Planting artichokes or other row crops will attract birds. And introducing sheep, goats, pigs or chickens will attract native predators such as coyotes, bobcats and foxes. Expanded ranching would only create new wildlife conflicts. Cattle ranching should only be allowed if it's consistent with preserving the natural environment. And agricultural activities such as mowing shouldn't be allowed in park areas where they harm endangered species or wildlife habitat, impair water quality, cause excessive erosion or spread invasive plants/diseases. Cattle are the seashore's primary source of greenhouse gases. So the Park Service's preferred alternative is inconsistent with its own "Climate Friendly Parks" plan.

#6328

Name: Huff, Laurie

Correspondence: The lethal removal of the Elk for the sole purpose of creating more land for the for profit raising of cattle speaks only to our own destruction of our joy in the environment. Raising cattle for human ingestion not only is massively toxic for the air and in direct opposition to climate protection but is not a needed human nutrient. Your plan is to take away something beautiful for all for the financial gain of a few. I am horrified at your intention and deeply saddened.

#6329

Name: Svetikova, Elena

Correspondence: Please, save Tule Elk in Point Reyes National Seashore!!! Point Reyes is a gem, a unique place, do not destroy it! Do not kill Tule Elk! We live in California in 21 century, the state should be an example of a responsible and humane attitude to nature.

#6330

Name: N/A, N/A

Correspondence: It's absolutely unreasonable and senseless to allow ranching or any other commercial endeavors to encroach on, endanger, or outright kill native wildlife that has already had its habitat irreparably damaged by humans. We know what we're doing and there is no financial excuse that justifies this pathetic action.

#6331

Name: Smith, Ray

Correspondence: Animal agriculture has no place in our society or our world. Please let the native animals live and don't let the money interests prevail Leave the elk alone and please don't let the animals for profit industries in

#6332

Name: Henderson , Liz

Correspondence: I am writing to urge the National Park Service to discontinue the grazing of beef and dairy cattle at Point Reyes National Seashore. This precious area has been damaged by livestock grazing which poses a threat to the environment and local wildlife and it should be protected and used to serve the public good, and not for the benefit of the livestock industry.

I strongly oppose Option B and any other proposal that would be fatal to Tule Elk or other wildlife to the benefit of ranching operations, and encourage the agency to adopt Option F to discontinue grazing and allow members of the public to enjoy this beautiful park and to be enriched with opportunities to visit and appreciate this special place.

#6333

Name: Ragsdale, Mary

Correspondence: Please adopt Alternative F.

Thank you

#6334

Name: Sheinin, Boris

Correspondence: Please, adopt Alternative F, which would discontinue farming and ranching opportunities in the park and expand visitor opportunities. The preservation of native wild species must take precedence over farming and ranching activities. Save Point Reyes, save Tule Elk!

#6335

Name: Dollinger, Mary

Correspondence: No more cattle. Leave the elk alone. STOP breeding and killing animals for human consumption.

#6336

Name: Harris, Holly

Correspondence: I'm writing to support the public access and bicycling improvements outlined under Alternatives B, C, D, E, and F. I strongly support proposals that would lead to the planning and implementation of bicycling routes on trails, ranch roads, and pathways throughout the planning area, including but not limited to: 1) a connection between Devil's Gulch and Platform Bridge Road using existing ranch roads, 2) a connection between Bolinas Ridge Trail at Olema Hill and Point Reyes Station to serve as an interim connection for the Cross Marin Trail, 3) a connection between Bolinas Ridge Trail and Five Brooks Stables using existing ranch roads 4) a connection between Drakes Estero and Abbotts Lagoon Trail using existing ranch roads, 5) a connection between Marshall Beach Trailhead and Pierce Point Road using existing ranch roads, and 6) an Estero Trail loop using existing ranch roads. I encourage NPS to collaborate with ranchers and other stakeholders to educate the public and address concerns related to public access on working ranch lands.

The improvements outlined above would enable and encourage me to visit the Seashore more regularly-and by bike, rather than car. I would feel much safer riding in the Seashore and surrounding areas on trails, pathways, and ranch roads, rather than on roads shared with fast-moving vehicular traffic. Bicycling opportunities are currently very limited and fragmented, so any improvements in connectivity and the creation of new loop options would enable me to enjoy more of the Seashore and surrounding areas by bike.

#6337

Name: N/A, N/A

Correspondence: Do not remove the tule elk from this land. They bring valuable tourism dollars and are more beneficial for the area than cattle. Cattle raised in Pt Reyes is luxury food that serves only a few. The elk can be seen by all and they were here first!

#6338

Name: Ratcliff, Philip

Correspondence: I've seen how grazing cattle in wilderness areas degrades the environment. Hiking in the Sierra Nevada, to Scout Carson Lake, I saw streams muddied, streamside vegetation trampled, and manure widespread. I even worried about my safety, when passing a herd of cattle, and a big bull stared me down. It's disgusting that the National Park Service is bending over for the Point Reyes cattle ranchers, at the expense of the environment. It's even more disgusting that the Park Service plans to kill the tule elk, to accommodate the ranchers. This is not surprising, because every aspect of environmental administration under the Trump regime, has flipped to favor private industry and corporations. I hope that when a Democrat assumes presidential office in 2021, all of the anti-environmental Trump appointees are quickly fired.

#6339

Name: Cheitlin, Melvin D.

Correspondence: I am writing to urge the National Park Service to discontinue the grazing of beef and dairy cattle at Point Reyes National Seashore. This precious area has been damaged by livestock grazing which poses a threat to the environment and local wildlife and it should be protected and used to serve the public good, and not for the benefit of the livestock industry.

I strongly oppose Option B and any other proposal that would be fatal to Tule Elk or other wildlife to the benefit of ranching operations, and encourage the agency to adopt Option F to discontinue grazing and allow members of the public to enjoy this beautiful park and to be enriched with opportunities to visit and appreciate this special place.

#6340

Name: N/A, N/A

Correspondence: Stop supporting commercial interests over our native, local wildlife. Leave the Tule Elk alone and protect our natural habitats.

#6341

Name: Babbini, Paul

Correspondence: I am writing to urge the National Park Service to discontinue the grazing of beef and dairy cattle at Point Reyes National Seashore. This precious area has been damaged by livestock grazing which poses a threat to the environment and local wildlife and it should be protected and used to serve the public good, and not for the benefit of the livestock industry.

I strongly oppose Option B and any other proposal that would be fatal to Tule Elk or other wildlife to the benefit of ranching operations, and encourage the agency to adopt Option F to discontinue grazing and allow members of the public to enjoy this beautiful park and to be enriched with opportunities to visit and appreciate this special place.

#6342

Name: Marcus, Martin

Correspondence: The Point Reyes National Seashore General Management Plan Amendment and Environmental Impact Statement is proposing to dedicate one third of Point Reyes National Seashore to cattle ranching and includes plans to kill off Tule elk that frequent the area. This plan only benefits twenty-four cattle ranchers who sold their land to the public 60 years ago, but still use the national park to graze their cattle. Point Reyes National Seashore is supposed to be managed under the Point Reyes Act for "maximum protection, restoration, and preservation of the natural environment." There's no mandate for prioritizing commercial agricultural leases on

these public lands. Natural values, native wildlife, public access and enjoyment should take priority over commercial activities at Point Reyes. Tule elk are an important part of the landscape at Point Reyes. Their recovery is a result of successful native ecosystem restoration, which is a key element of the Park Service's mission. It's taken a lot of time, money and effort to restore tule elk to Point Reyes, the only national park where they live. Tule elk should be allowed to roam free and forage in the park - not shot, removed, fenced or treated as problem animals. The Park Service shouldn't allow any new agricultural activities at Point Reyes. Planting artichokes or other row crops will attract birds. And introducing sheep, goats, pigs or chickens will attract native predators such as coyotes, bobcats and foxes. Expanded ranching would only create new wildlife conflicts. Cattle ranching should only be allowed if it's consistent with preserving the natural environment. And agricultural activities such as mowing shouldn't be allowed in park areas where they harm endangered species or wildlife habitat, impair water quality, cause excessive erosion or spread invasive plants/diseases. Cattle are the seashore's primary source of greenhouse gases. So the Park Service's preferred alternative is inconsistent with its own "Climate Friendly Parks" plan.

#6343

Name: Green, Deborah

Correspondence: Just Learned of the plan to Thin the tule elk herds for the benefit of the cattle ranchers. I am opposed to this plan as It goes against all the progress we've made in California for habitat restoration. The cattle have always seemed Odd to see there since it is wild land, I understood they were grandfathered in so we were stuck with them. In no way do I support them receiving more privileges at the expense of our diminishing, protected lands and wildlife. Thank you for your attention .

#6344

Name: Marie, Adrienne

Correspondence: The elk deserve to live. They are one of the many reasons people visit the point Reyes seashore. It absolutely floors me that government organizations think that culling populations is the solution to problem. I am deeply disappointed in NPS and I will NOT be renewing my park pass. I do not support these actions and i sure as hell don't want my money going towards services like this. Shame on the NPS for giving in to the demands of ranchers. I used to be a proud supporter, but now I am just disgusted.

#6345

Name: Shoberg, Lu

Correspondence: Public lands are not a source of free grazing for domestic livestock. Graze your own land.

#6346

Name: N/A, Tony

Correspondence: I've become extremely saddened to learn of the impacts cattle ranching is having at Point Reyes National Seashore. The Seashore is such a beautiful place to visit, but the cows I've learned are causing a tremendous amount of environmental damage. The cattle-ranching at the seashore has resulted in tremendous soil erosion, loss of native plant and animal species, dead zones in local streams, rivers, lakes, bays and even in the ocean. The cows reduce the amount of grazing land the native Tule Elk have as well. I hear that ranchers are requesting that the National Park Service begin culling Tule Elk herds so they have more grazing land for their non-native and destructive cows.

It's beyond comprehension that the National Park Service would allow cattle ranching in the National Park in this day and age. The ranchers were paid generously for their land in 1962 and given a 25-year lease so they could transition away. The leases have been continued ever since. What in the world is going on? Where is the corruption in the NPS coming from? This goes against the very mandate of the NPS to protect the natural environment for the citizens of the United States.

I urge the National Park Service to live up to their mandate of protecting the natural environment and not caving to private industry and political lobby groups that are coercing the NPS to destroy the very land they are responsible for protecting.

Please, do not extend the leases of the ranchers. The dairy and cattle ranchers must leave as soon as possible so we can realize the Point Reyes National Seashore that was promised to the citizens of the United States of America.

Kind Regards, Tony

#6347

Name: hoang, Lynn

Correspondence: I urge the National Park Service to discontinue the grazing of beef cattle at Point Reyes National Seashore. I strongly oppose option B and urge the agency to adopt option f

#6348

Name: Dragavon, Linda

Correspondence: Do not kill these majestic animals. Humans chose to reintroduce them so it's not fair to them to destroy them. Sterilize and release them or figure some other way to manage them.

#6349

Name: Jech, Stormy

Correspondence: We must keep Point Reyes as it is, a precious habitat of wildlife that is needed for our environment, not for a feeding ground for cows that will destroy the natural habitat that is needed in our environment.

#6350

Name: Smith, Patricia

Correspondence: Please protect native wildlife in Point Reyes-like the Tule Elk-from being killed to promote cattle grazing.

#6351

Name: N/A, N/A

Correspondence: Tule elk are an important part of the landscape at Point Reyes. Their recovery is a result of successful native ecosystem restoration, which is a key element of the Park Service's mission. It's taken a lot of time, money and effort to restore tule elk to Point Reyes, the only national park where they live. Tule elk should be allowed to roam free and forage in the park - not shot, removed, fenced or treated as problem animals.

#6352

Name: Walsh, Karen

Correspondence: What an absolute shame and disgrace this is. You are killing animals, beautiful animals that have a right to be there. There has to be a better way. I am fearful that business and greed are ruining this planet.

#6353

Name: christou, angelo

Correspondence: Please help.



#6354

Name: Witte, Lisa

Correspondence: Why on earth is killing native species to allow more damaging livestock grazing even being considered?

I am writing to urge the National Park Service to discontinue the grazing of beef and dairy cattle at Point Reyes National Seashore. This precious area has been damaged by livestock grazing which poses a threat to the environment and local wildlife and it should be protected and used to serve the public good, and not for the benefit of the livestock industry.

I strongly oppose Option B and any other proposal that would be fatal to Tule Elk or other wildlife to the benefit of ranching operations, and encourage the agency to adopt Option F to discontinue grazing and allow members of the public to enjoy this beautiful park and to be enriched with opportunities to visit and appreciate this special place.

#6355

Name: N/A, N/A

Correspondence: I am writing to urge the National Park Service to discontinue the grazing of beef and dairy cattle at Point Reyes National Seashore. This precious area has been damaged by livestock grazing which poses a threat to the environment and local wildlife and it should be protected and used to serve the public good, and not for the benefit of the livestock industry.

I strongly oppose Option B and any other proposal that would be fatal to Tule Elk or other wildlife to the benefit of ranching operations, and encourage the agency to adopt Option F to discontinue grazing and allow members of the public to enjoy this beautiful park and to be enriched with opportunities to visit and appreciate this special place.

Thank you.

#6356

Name: Rabon, Jennifer

Correspondence:

These public lands are currently home to all manner of wildlife including badgers, bobcats, coyotes, burrowing owls and other predators. Tule Elk also call the Seashore lands home. NPS should prioritize protecting these natural resources.

I am opposed to the removal of any Tule Elk from PRNS and I urge NPS to reject any conversion of National Park lands to row crops or expansion of commercial livestock farming to introduce sheep, goats, turkeys, chickens or pigs which would only increase conflicts with wildlife, and degrade wildlife habitat and water quality.

#6357

Name: N/A, N/A

Correspondence: I am writing to urge the National Park Service to discontinue the grazing of beef and dairy cattle at Point Reyes National Seashore. This precious area has been damaged by livestock grazing which poses a threat to the environment and local wildlife and it should be protected and used to serve the public good, and not for the benefit of the livestock industry.

I strongly oppose Option B and any other proposal that would be fatal to Tule Elk or other wildlife to the benefit of ranching operations, and encourage the agency to adopt Option F to discontinue grazing and allow members of the public to enjoy this beautiful park and to be enriched with opportunities to visit and appreciate this special place.

#6358

Name: Lavan, Mark

Correspondence: I'm writing to support the public access and bicycling improvements outlined under Alternatives B, C, D, E, and F. I strongly support proposals that would lead to the planning and implementation of bicycling routes on trails, ranch roads, and pathways throughout the planning area, including but not limited to: 1) a connection between Devil's Gulch and Platform Bridge Road using existing ranch roads, 2) a connection between Bolinas Ridge Trail at Olema Hill and Point Reyes Station to serve as an interim connection for the Cross Marin Trail, 3) a connection between Bolinas Ridge Trail and Five Brooks Stables using existing ranch roads 4) a connection between Drakes Estero and Abbotts Lagoon Trail using existing ranch roads, 5) a connection between Marshall Beach Trailhead and Pierce Point Road using existing ranch roads, and 6) an Estero Trail loop using existing ranch roads. I encourage NPS to collaborate with ranchers and other stakeholders to educate the public and address concerns related to public access on working ranch lands.

The improvements outlined above would enable and encourage me to visit the Seashore more regularly-and by bike, rather than car. I would feel much safer riding in the Seashore and surrounding areas on trails, pathways, and ranch roads, rather than on roads shared with fast-moving vehicular traffic. Bicycling opportunities are currently very limited and fragmented, so any improvements in connectivity and the creation of new loop options would enable me to enjoy more of the Seashore and surrounding areas by bike.

#6359

Name: Keener, Lindsey

Correspondence: Please prohibit the exploitation of cattle grazing and allowing ranchers to continue to do this and protect the tule elk and other indigenous wildlife. Thank you.

#6360

Name: Thomas, Trisha

Correspondence: Please adopt Alternative F - the preservation of wild species should take priority over farming and ranching activities. Grazing negatively effects ecosystems, causes water pollution and soil erosion, spreading invasive disease and species and harming endangered species.

#6361

Name: Edwards, Kris

Correspondence: I am writing to urge the National Park Service to discontinue the grazing of beef and dairy cattle at Point Reyes National Seashore. This precious area has been damaged by livestock grazing which poses a threat to the environment and local wildlife and it should be protected and used to serve the public good, and not for the benefit of the livestock industry.

I strongly oppose Option B and any other proposal that would be fatal to Tule Elk or other wildlife to the benefit of ranching operations, and encourage the agency to adopt Option F to discontinue grazing and allow members of the public to enjoy this beautiful park and to be enriched with opportunities to visit and appreciate this special place.

#6362

Name: Patterson, Thomas

Correspondence: • Point Reyes National Seashore is supposed to be managed under the Point Reyes Act for "maximum protection, restoration, and preservation of the natural environment." There's no mandate for prioritizing commercial agricultural leases on these public lands.

- Natural values, native wildlife, public access and enjoyment should take priority over commercial activities at Point Reyes.
- Tule elk are an important part of the landscape at Point Reyes. Their recovery is a result of successful native ecosystem restoration, which is a key element of the Park Service's mission. It's taken a lot of time, money and effort to restore tule elk to Point Reyes, the only national park where they live. Tule elk should be allowed to roam free and forage in the park - not shot, removed, fenced or treated as problem animals.
- Right now the Point Reyes ranches enjoy not only subsidized grazing fees and housing, but also taxpayer-funded infrastructure and road improvements, and publicly funded projects. But commercial activities at Point Reyes should be required to accommodate native wildlife - not the other way around.
- The Park Service shouldn't allow any new agricultural activities at Point Reyes. Planting artichokes or other row crops will attract birds. And introducing sheep, goats, pigs or chickens will attract native predators such as coyotes, bobcats and foxes. Expanded ranching would only create new wildlife conflicts.
- Cattle ranching should only be allowed if it's consistent with preserving the natural environment. And agricultural activities such as mowing shouldn't be allowed in park areas where they harm endangered species or wildlife habitat, impair water quality, cause excessive erosion or spread invasive plants/diseases.
- Cattle are the seashore's primary source of greenhouse gases. So the Park Service's preferred alternative is inconsistent with its own "Climate Friendly Parks" plan.

#6363

Name: Green, Clay

Correspondence: Dear Point Reyes National Seashore Superintendent, Please select the preferred alternative, "Alternative B" for the future of ranching in the Point Reyes National Seashore. I support agriculture in the Seashore and think it is a vital part of the region's history, culture, and current economy. I appreciate the time and effort that has gone into researching all options for the draft EIS. I support 20-year leases, the ability for farmers and ranchers to succession plan, and the opportunity for farms and ranches to diversify their operations to viability and sustainability adapt their operations for generations to come. I wish that the diversification was not so limited in scope or size, 2.5 acres around structures in ranch core with no irrigation and other restrictions is cumbersome. In addition, the draft EIS would have been more complete if research was done on an option that includes an Elk Fence between the agriculture and wilderness area or Elk relocation to the wilderness area. Agriculture is a partner in natural resource conservation and preserving open spaces. Many of the beautiful natural landscapes in the US near large urban areas are preserved because agriculture was there first to curb development. Agriculture and nature do co-exist, we support the farmers and ranchers in the Seashore for their part in providing for the local foodshed in a sustainable way. Agriculture plays an important role in combating Climate Change by providing local food and carbon and greenhouse gas drawdown. Agriculture is important to me in the Point Reyes National Seashore, the preferred alternative B is the best option from the draft EIS.

#6364

Name: Scholz, Nancy

Correspondence: I am writing to ask you to do the right thing and protect the tule elk at Point Reyes National

Seashore in California. They have every right to be there and certainly you can create a plan to protect these animals.

#6365

Name: Cagey, Sharon

Correspondence: Please protect our animals

#6366

Name: Macgregor, Daniel

Correspondence: Seeing Elk in Point Reyes is one of my favorite memories. Cows are a dime a dozen.

I am writing to urge the National Park Service to discontinue the grazing of beef and dairy cattle at Point Reyes National Seashore. This precious area has been damaged by livestock grazing which poses a threat to the environment and local wildlife and it should be protected and used to serve the public good, and not for the benefit of the livestock industry.

I strongly oppose Option B and any other proposal that would be fatal to Tule Elk or other wildlife to the benefit of ranching operations, and encourage the agency to adopt Option F to discontinue grazing and allow members of the public to enjoy this beautiful park and to be enriched with opportunities to visit and appreciate this special place.

#6367

Name: Gost, Karyn

Correspondence: I am writing to urge the National Park Service to discontinue the grazing of beef and dairy cattle at Point Reyes National Seashore. This precious area has been damaged by livestock grazing which poses a threat to the environment and local wildlife and it should be protected and used to serve the public good, and not for the benefit of the livestock industry.

I strongly oppose Option B and any other proposal that would be fatal to Tule Elk or other wildlife to the benefit of ranching operations, and encourage the agency to adopt Option F to discontinue grazing and allow members of the public to enjoy this beautiful park and to be enriched with opportunities to visit and appreciate this special place.

#6368

Name: Sullenberger, Debra

Correspondence: Please do not kill these elk. They are members of a herd. They protect each other and depend on every member to survive. You could be killing family. There must be some other way. This area is their home. It is we humans who are the intruders. Thank you!

#6369

Name: Bruso, Xantha

Correspondence: Hello, I appreciate and support the improvements in public and bicycle access outlined under Alternatives B, C, D, E, and F. I am in support of the following trail connections and plan elements: - A connection between Devil's Gulch and Platform Bridge Road using existing ranch roads. - A connection between Bolinas Ridge Trail at Olema Hill and Point Reyes Station to serve as an interim connection for the Cross Marin Trail. - A connection between Bolinas Ridge Trail and Five Brooks Stables using existing ranch roads. - A connection between Drakes Estero and Abbotts Lagoon Trail using existing ranch roads. - A connection between Marshall Beach Trailhead and Pierce Point Road using existing ranch roads. An Estero Trail loop using existing ranch

roads. Collaboration with ranchers and other stakeholders to educate the public and address concerns related to public access on working ranch lands. I would enjoy Pt. Reyes even more if I could bike more routes and bike more safely in the park. Thank you, Xantha Brusco

#6370

Name: Braunschweig, Dayla

Correspondence: Stop using any land for the meat industry. Meat is not sustainable. Meat is a major cause of climate change. Using land for raising meat is killing off wildlife. STOP.

#6371

Name: N/A, N/A

Correspondence: commercial agriculture should not be valued over wildlife

#6372

Name: Gurn, Alex

Correspondence: The Tule Elk of Point Reyes National Park must be protected. Point Reyes is the only natural habitat where the elk live freely. The maintenance of free ranging tule elk to the National Seashore was an important part of the restoration of the natural ecosystems historically found in this area. One of the primary missions of the National Park Service is to protect and conserve our native species and ecosystems. The NPS should not compromise this core mission by supporting the wants of cattle ranchers at the expense of this state and national treasure.

#6373

Name: Materi, Sandra

Correspondence: Point Reyes National Seashore is supposed to be managed under the Point Reyes Act for "maximum protection, restoration, and preservation of the natural environment." There's no mandate for prioritizing commercial agricultural leases on these public lands. Natural values, native wildlife, public access and enjoyment should take priority over commercial activities at Point Reyes. Tule elk are an important part of the landscape at Point Reyes. Their recovery is a result of successful native ecosystem restoration, which is a key element of the Park Service's mission. It's taken a lot of time, money and effort to restore tule elk to Point Reyes, the only national park where they live. Tule elk should be allowed to roam free and forage in the park - not shot, removed, fenced or treated as problem animals. Right now the Point Reyes ranches enjoy not only subsidized grazing fees and housing, but also taxpayer-funded infrastructure and road improvements, and publicly funded projects. But commercial activities at Point Reyes should be required to accommodate native wildlife - not the other way around. The Park Service shouldn't allow any new agricultural activities at Point Reyes. Planting artichokes or other row crops will attract birds. And introducing sheep, goats, pigs or chickens will attract native predators such as coyotes, bobcats and foxes. Expanded ranching would only create new wildlife conflicts. Cattle ranching should only be allowed if it's consistent with preserving the natural environment. And agricultural activities such as mowing shouldn't be allowed in park areas where they harm endangered species or wildlife habitat, impair water quality, cause excessive erosion or spread invasive plants/diseases. Cattle are the seashore's primary source of greenhouse gases. So the Park Service's preferred alternative is inconsistent with its own "Climate Friendly Parks" plan.

#6374

Name: cobb, robert

Correspondence: Point Reyes National Seashore is supposed to be managed under the Point Reyes Act for

"maximum protection, restoration, and preservation of the natural environment." There's no mandate for prioritizing commercial agricultural leases on these public lands. Natural values, native wildlife, public access and enjoyment should take priority over commercial activities at Point Reyes. Tule elk are an important part of the landscape at Point Reyes. Their recovery is a result of successful native ecosystem restoration, which is a key element of the Park Service's mission. It's taken a lot of time, money and effort to restore tule elk to Point Reyes, the only national park where they live. Tule elk should be allowed to roam free and forage in the park - not shot, removed, fenced or treated as problem animals. Right now the Point Reyes ranches enjoy not only subsidized grazing fees and housing, but also taxpayer-funded infrastructure and road improvements, and publicly funded projects. But commercial activities at Point Reyes should be required to accommodate native wildlife - not the other way around. The Park Service shouldn't allow any new agricultural activities at Point Reyes. Planting artichokes or other row crops will attract birds. And introducing sheep, goats, pigs or chickens will attract native predators such as coyotes, bobcats and foxes. Expanded ranching would only create new wildlife conflicts. Cattle ranching should only be allowed if it's consistent with preserving the natural environment. And agricultural activities such as mowing shouldn't be allowed in park areas where they harm endangered species or wildlife habitat, impair water quality, cause excessive erosion or spread invasive plants/diseases. Cattle are the seashore's primary source of greenhouse gases. So the Park Service's preferred alternative is inconsistent with its own "Climate Friendly Parks" plan.

#6375

Name: R, Georgia

Correspondence: I am writing to urge the National Park Service to discontinue the grazing of beef and dairy cattle at Point Reyes National Seashore. This precious area has been damaged by livestock grazing which poses a threat to the environment and local wildlife and it should be protected and used to serve the public good, and not for the benefit of the livestock industry.

I strongly oppose Option B and any other proposal that would be fatal to Tule Elk or other wildlife to the benefit of ranching operations, and encourage the agency to adopt Option F to discontinue grazing and allow members of the public to enjoy this beautiful park and to be enriched with opportunities to visit and appreciate this special place.

#6376

Name: Lemmon, Courtney

Correspondence: I am writing to urge the National Park Service to discontinue the grazing of beef and dairy cattle at Point Reyes National Seashore. This precious area has been damaged by livestock grazing which poses a threat to the environment and local wildlife and it should be protected and used to serve the public good, and not for the benefit of the livestock industry.

I strongly oppose Option B and any other proposal that would be fatal to Tule Elk or other wildlife to the benefit of ranching operations, and encourage the agency to adopt Option F to discontinue grazing and allow members of the public to enjoy this beautiful park and to be enriched with opportunities to visit and appreciate this special place.

#6377

Name: Posse, Max

Correspondence: I am writing to urge the National Park Service to discontinue the grazing of beef and dairy cattle at Point Reyes National Seashore. This precious area has been damaged by livestock grazing which poses a threat to the environment and local wildlife and it should be protected and used to serve the public good, and not for the benefit of the livestock industry.

So much of the planet is being destroyed for livestock production, we have lost countless acres of forest as well as seen wildlife take a heavy hit from the destruction. Now is the time to take action against these changes and prevent more loss, our parks should be a beacon of resistance and change to our battle against not only climate change but the preservation of our planets natural wonder and part of the fight to keep them untouched and wild.

I strongly oppose Option B and any other proposal that would be fatal to Tule Elk or other wildlife to the benefit of ranching operations, and encourage the agency to adopt Option F to discontinue grazing and allow members of the public to enjoy this beautiful park and to be enriched with opportunities to visit and appreciate this special place.

#6378

Name: Buyny, Jane

Correspondence: I am strongly opposed to any expansion of commercial grazing into Point Reyes National Seashore. I am also strongly exposed to lethal removal of Tule Elk. Why would a park service expand cattle at the expense of wildlife? Clearly the planet is already struggling with the effects of wildlife management which seems to want to eliminate wildlife and expand cattle, to the detriment of the environment.

#6379

Name: Marcianelli, Marla

Correspondence: Elk Culling:

6,000 cows compete with 125 tule elk for grass inside the National Park. This has caused the lease holders to push for the removal of the tule elk. In the proposed NPS plan, the elk population of the Drakes Beach herd would be capped at 120 and each year the National Park Service would kill as many elk necessary to reach their proposed limit.

Tule elk are native to the Point Reyes peninsula and Point Reyes National Seashore is the only National Park unit that is home to this species. The killing of elk to mitigate a conflict with cows is incomprehensible and against the NPS's very obligation to provide maximum protection to our natural resources.

Row Crops:

The NPS proposal would allow current park grasslands and wildlife habitat to be converted to commercial row crops.

Today row crops are not allowed in the park. Why is the NPS allowing this new land use? How does this provide maximum protection for our wildlife? This land is home to bobcats, coyotes, badgers, long tailed weasels, grey fox, tule elk and black tailed deer. It is home to mice, gophers, snakes, lizards and countless insects. It is home to ground nesting birds such as northern harriers, red winged blackbirds and sparrows. It is hunting grounds for red tailed hawks, white tailed kites, great horned owls, barn owls and dozens of other species. The conversion of this land will have a devastating impact on the park's native species, let alone the environmental impact of pesticide use, new fencing, rodent and rabbit conflicts, commercial vehicle traffic and all else that comes with commercial farming.

New Farm Animals:

Lease holders will be allowed to raise previously unauthorized domestic animals for commercial purposes including pigs, chickens, sheep and goats.

Look what has happened with the conflict between grass eating cows and tule elk. It ends with the killing of tule elk. What is going to happen when a bobcat takes a chicken or a coyote takes a pig? The introduction of new domestic animals will MOST CERTAINLY create conflict with native wildlife. Major habitat loss will also happen for native animals from this new land use. This must not be allowed.

The current proposal by the National Park Service will have a massive negative impact to the park's native wildlife. I am absolutely devastated by this news. Please do not make these changes.

#6380

Name: Kieckhefer, Karen

Correspondence: I care about protecting California's wildlife. I oppose the National Park Service's plan to kill native tule elk and expand commercial agriculture in Point Reyes National Seashore and Golden Gate National Recreation Area. I urge the National Park Service to instead restore the lands for wild animal habitat.

We should prioritize the preservation of our public lands and wildlife, not the economic interests of private ranchers. These commercial cattle ranches have serious negative environmental impacts on the park - polluting waterways, causing soil erosion, and harming the many endangered and threatened animals who live on Point Reyes. National parks exist to protect our natural resources and native wildlife. This park should be managed accordingly.

#6381

Name: Shipley, Amy

Correspondence: I support Alternative F, phasing out cattle and dairy industry and returning the land to its natural state. The enabling legislation of the National Seashore supports wildlife protection and does not mention upholding private industry. The original leases to ranchers were to be 25 years. Ranchers have already been paid handsomely for their land, so it is long overdue to phase out the ranches. "Cultural Resource" and "Historic" does not mean industry needs to be currently in operation.

Private business has no place on public land. Allowing industry and ranches to diversify their business is a bad idea. Already these ranches have been negatively impacting the land, mismanaged to allow soil erosion, scarring in the landscape, e.coli contamination in waterways and more. If you allow EVEN MORE agricultural practices on the seashore, there is no way to know the impact and there is no historical evidence you will be able to manage any negative impacts on the environment.

Tule Elk should be protected for the survival of their species. They have already gone through a huge genetic bottle neck when they were almost completely wiped out except for 20 individuals. Every gene allele is important for the long term sustainability of the herd. The National Park should be protecting all Tule Elk, and allowing new herds to form and to TAKE DOWN THE FENCE at Pierce Point and allow all Tule Elk to roam free.

I do not support granting 20 year leases to cattle and dairy industry. Climate science has indicated we have less than 12 years to mitigate the worst of climate catastrophe. Allowing business that has been linked to water pollution, species extinction and in Point Reyes is the culprit of over 60% of the greenhouse gas emissions, it is not a good idea to give that same industry a 20-year lease to continue degrading our national park. Point Reyes is a refuge to thousands of plants and animals. Point Reyes can be a leader in the fight for climate justice, and it starts with phasing out Beef and Dairy operations and restoring the land to its natural state. The EIS has NO MENTION of the effects of climate change in it, and does not include any information of the cattle and dairy's impact on climate change within the park.

Thank you



#6382

Name: Tes, Sstoz

Correspondence: T.W.I.M.C.:

Please discontinue the grazing of all cattle at Point Reyes National Seashore. Livestock grazing has been allowed to do its damage to the P.R.N.S. already, including to watercourses, the water itself, endemic wildlife, as well as the substantial contribution to carbon dioxide and methane emissions inherent to cattle.

Option B is particularly offensive, as would be any proposal that allows the culling of Tule Elk and other native wildlife, primarily to benefit ranching operations. Please adopt Option F - - discontinue cattle grazing so that native species can reclaim the lands stolen from them by the misguided, mendacious, ignorant and destructive policies of the past.

Best regards

Sstoz Tes

#6383

Name: N/A, N/A

Correspondence: Elk Culling: 6,000 cows compete with 125 tule elk for grass inside the National Park. This has caused the lease holders to push for the removal of the tule elk. In the proposed NPS plan, the elk population of the Drakes Beach herd would be capped at 120 and each year the National Park Service would kill as many elk necessary to reach their proposed limit.

Tule elk are native to the Point Reyes peninsula and Point Reyes National Seashore is the only National Park unit that is home to this species. The killing of elk to mitigate a conflict with cows is incomprehensible and against the NPS's very obligation to provide maximum protection to our natural resources.

Row Crops:

The NPS proposal would allow current park grasslands and wildlife habitat to be converted to commercial row crops.

Today row crops are not allowed in the park. Why is the NPS allowing this new land use? How does this provide maximum protection for our wildlife? This land is home to bobcats, coyotes, badgers, long tailed weasels, grey fox, tule elk and black tailed deer. It is home to mice, gophers, snakes, lizards and countless insects. It is home to ground nesting birds such as northern harriers, red winged blackbirds and sparrows. It is hunting grounds for red tailed hawks, white tailed kites, great horned owls, barn owls and dozens of other species. The conversion of this land will have a devastating impact on the park's native species, let alone the environmental impact of pesticide use, new fencing, rodent and rabbit conflicts, commercial vehicle traffic and all else that comes with commercial farming.

New Farm Animals:

Lease holders will be allowed to raise previously unauthorized domestic animals for commercial purposes including pigs, chickens, sheep and goats.

Look what has happened with the conflict between grass eating cows and tule elk. It ends with the killing of tule elk. What is going to happen when a bobcat takes a chicken or a coyote takes a pig? The introduction of new domestic animals will MOST CERTAINLY create conflict with native wildlife. Major habitat loss will also happen for native animals from this new land use. This must not be allowed.

The current proposal by the National Park Service will have a massive negative impact to the park's native wildlife. I am absolutely devastated by this news. Please do not make these changes.

#6384

Name: N/A, N/A

Correspondence: I support option F. There are plenty of dairy and cattle operations available in the adjacent areas. Point Reyes is underutilized by the public because of the massive ranch lands. Remove the grazing rights, allow the other native species to thrive, add expand options for visitors.

#6385

Name: ramirez, grace

Correspondence: How wrong is it to allow this to happen? You have no right to kill ANY living creature so that some rancher can graze HIS cattle! NO! No! No! WRONG!!!!

#6386

Name: Wallace, Andrea

Correspondence: We have to make it a priority to protect these animals.

#6387

Name: Flatto, Janice

Correspondence: I support Alternative F, phasing out cattle and dairy industry and returning the land to its natural state. The enabling legislation of the National Seashore supports wildlife protection and does not mention upholding private industry. The original leases to ranchers were to be 25 years. Ranchers have already been paid handsomely for their land, so it is long overdue to phase out the ranches. "Cultural Resource" and "Historic" does not mean industry needs to be currently in operation. PRIVATE BUSINESS HAS NO BUSINESS ON PUBLIC LAND! Allowing industry and ranches to diversify their business is a bad idea. Already these ranches have been negatively impacting the land, mismanaged to allow soil erosion, scarring in the landscape, e.coli contamination in waterways and more. If you allow EVEN MORE agricultural practices on the seashore, there is no way to know the impact and there is no historical evidence you will be able to manage any negative impacts on the environment. Tule Elk should be protected for the survival of their species. They have already gone through a huge genetic bottle neck when they were almost completely wiped out except for 20 individuals. Every gene allele is important for the long term sustainability of the herd. The National Park should be protecting all Tule Elk, and allowing new herds to form and to TAKE DOWN THE FENCE at Pierce Point and allow all Tule Elk to roam free. I do not support granting 20 year leases to cattle and dairy industry. Climate science has indicated we have less than 12 years to mitigate the worst of climate catastrophe. Allowing business that has been linked to water pollution, species extinction and in Point Reyes is the culprit of over 60% of the greenhouse gas emissions, it is not a good idea to give that same industry a 20-year lease to continue degrading our national park. Point Reyes is a refuge to thousands of plants and animals. Point Reyes can be a leader in the fight for climate justice, and it starts with phasing out Beef and Dairy operations and restoring the land to its natural state. The EIS has NO MENTION of the effects of climate change in it, and does not include any information of the cattle and dairy's impact on climate change within the park.

#6388

Name: O'Connor, Kyle

Correspondence: I support Alternative F, phasing out cattle and dairy industry and returning the land to its natural state. The enabling legislation of the National Seashore supports wildlife protection and does not mention

upholding private industry. The original leases to ranchers were to be 25 years. Ranchers have already been paid handsomely for their land, so it is long overdue to phase out the ranches. "Cultural Resource" and "Historic" does not mean industry needs to be currently in operation. Private business has no place on public land. Allowing industry and ranches to diversify their business is a bad idea. Already these ranches have been negatively impacting the land, mismanaged to allow soil erosion, scarring in the landscape, e.coli contamination in waterways and more. If you allow EVEN MORE agricultural practices on the seashore, there is no way to know the impact and there is no historical evidence you will be able to manage any negative impacts on the environment. Tule Elk should be protected for the survival of their species. They have already gone through a huge genetic bottle neck when they were almost completely wiped out except for 20 individuals. Every gene allele is important for the long term sustainability of the herd. The National Park should be protecting all Tule Elk, and allowing new herds to form and to TAKE DOWN THE FENCE at Pierce Point and allow all Tule Elk to roam free. I do not support granting 20 year leases to cattle and dairy industry. Climate science has indicated we have less than 12 years to mitigate the worst of climate catastrophe. Allowing business that has been linked to water pollution, species extinction and in Point Reyes is the culprit of over 60% of the greenhouse gas emissions, it is not a good idea to give that same industry a 20-year lease to continue degrading our national park. Point Reyes is a refuge to thousands of plants and animals. Point Reyes can be a leader in the fight for climate justice, and it starts with phasing out Beef and Dairy operations and restoring the land to its natural state. The EIS has NO MENTION of the effects of climate change in it, and does not include any information of the cattle and dairy's impact on climate change within the park.

#6389

Name: Chrostowski, Paul

Correspondence: My wife and I (both credentialed environmental scientists) have been visiting Point Reyes several weeks a year for about 30 years now. Every year, including this one, we have witnessed the continuing degradation of the park due to ranching activities. Soil compaction and erosion are quite evident, there is obvious evidence of eutrophication in the esteros and creeks, Bishop pines are declining, the air quality around the ranching operations is very poor, especially for fine particulate and odorous compounds (many of which may be toxic). The loss of abundance and diversity among plant, insect, bird, and small mammal communities is also quite obvious to an informed observer. In addition to these observations, the DEIS is replete with discussion of adverse impacts to the natural environment from ranching operations. Just from the standpoint of greenhouse gases alone, the impact of cattle is startling. In addition, these activities will continue to destroy soil, negatively impact water quality (nutrients, microbial pathogens) and continue to be a source of both conventional and toxic air pollutants that will add to the existing poor air quality burden of the Bay Area. The DEIS clearly points to alternative F as the only option to save Point Reyes for the future. Enhancement of the natural environment with an emphasis on ecotourism is probably the only way that Point Reyes can survive.

#6390

Name: Howard, Timothy

Correspondence: An endangered species of Elk is more important than cattle ranching. Cattle are not endangered. Ranches are not endangered. Stop killing elk in Point Reyes.

#6391

Name: Adkins, Julia

Correspondence: Please remember the Tule Elk and work in their favor. Protect the Tule Elk population of Point Reyes.

#6392

Name: N/A, Susan

Correspondence: Please leave the elk alone it is their land not the ranchers.

Its the ranchers that are destroying our world - restrict their activities or there wont be a seashore left to protect.

#6393

Name: Pham, Thoi

Correspondence: Leave the Tule Elk alone! It's ridiculous to expand dairy and cattle operations on national parkland. That's not the purpose of parkland was created. It's to protect and preserve natural habitat and biodiversity, Not for some businesses to gain unfair advantages, kill native wildlife and destroy the environment in unsustainable businesses, all funded by our taxpayer dollars?! NPS what are you trying to do??

#6394

Name: theden, tiffany

Correspondence: It is absolutely unacceptable that there are plans to kill Tule elk at Point Reyes. There are only 4,000 of these elk in existence - they should never be killed, for any reason, especially not because of cattle ranching. Point Reyes National Seashore is supposed to be managed under the Point Reyes Act for "maximum protection, restoration, and preservation of the natural environment." Killing endangered, endemic, native animals in no way upholds that sentiment.

If the elk are in conflict with cattle, then they could be moved to another area of the park, or another park in California, not killed because they interfere with the economics of ranching. Commercial activities at Point Reyes should be required to accommodate native wildlife - not the other way around.

Tule elk are an important part of the Point Reyes ecosystem and their recovery is a result of successful native ecosystem restoration, which is a key element of the Park Service's mission. It's taken a lot of time, money and effort to restore Tule elk to Point Reyes, the only national park where they live. They should be allowed to roam free and forage in the park - not shot, removed, fenced or treated as problem animals.

Please do not kill Tule elk at Point Reyes.

#6395

Name: Miller, Heidi

Correspondence: We need to protect the Earth and the animals who live here with us. We need to finally say no to greed.

#6396

Name: DeVenzio, Anne

Correspondence: I am writing to urge the National Park Service to discontinue the grazing of beef and dairy cattle at Point Reyes National Seashore. This precious area has been damaged by livestock grazing which poses a threat to the environment and local wildlife and it should be protected and used to serve the public good, and not for the benefit of the livestock industry.

I strongly oppose Option B and any other proposal that would be fatal to Tule Elk or other wildlife to the benefit of ranching operations, and encourage the agency to adopt Option F to discontinue grazing and allow members of the public to enjoy this beautiful park and to be enriched with opportunities to visit and appreciate this special place.

#6397

Name: Troup, Dave

Correspondence: I support the public access and bicycling improvements outlined under Alternatives B, C, D, E,

and F. I strongly support proposals that would lead to the planning and implementation of bicycling routes on trails, ranch roads, and pathways throughout the planning area, including but not limited to: 1) a connection between Devil's Gulch and Platform Bridge Road using existing ranch roads, 2) a connection between Bolinas Ridge Trail at Olema Hill and Point Reyes Station to serve as an interim connection for the Cross Marin Trail, 3) a connection between Bolinas Ridge Trail and Five Brooks Stables using existing ranch roads 4) a connection between Drakes Estero and Abbotts Lagoon Trail using existing ranch roads, 5) a connection between Marshall Beach Trailhead and Pierce Point Road using existing ranch roads, and 6) an Estero Trail loop using existing ranch roads. I encourage NPS to collaborate with ranchers and other stakeholders to educate the public and address concerns related to public access on working ranch lands.

The improvements outlined above would enable and encourage me and other riders to visit the Seashore more regularly - and by bike, rather than car. I would feel much safer riding in the Seashore and surrounding areas on trails, pathways, and ranch roads, rather than on roads shared with fast-moving vehicular traffic. Bicycling opportunities are currently very limited and fragmented, so any improvements in connectivity and the creation of new loop options would enable me to enjoy more of the Seashore and surrounding areas by bike.

#6398

Name: Mendez, Karen

Correspondence: I support Alternative F, protecting the native species Tule Elk. Please take down the fence at Pierce Point to let the elk roam free. Please cease granting the cattle and dairy industry extended leases; they have already been more than compensated for their land use. Additionally, private and government businesses should not be allowed to use public land. Please protect it. I'm a registered voter in Sonoma County and will be watching this and many other issues. The outcomes of the issues I care about determine whom I reelect and elect in the future. Thank you for your time, Karen Sue Mendez

#6399

Name: Edwards, E Adwin

Correspondence: I am writing to urge the National Park Service to discontinue the grazing of beef and dairy cattle at Point Reyes National Seashore. This precious area has been damaged by livestock grazing which poses a threat to the environment and local wildlife and it should be protected and used to serve the public good, and not for the benefit of the livestock industry.

I strongly oppose Option B and any other proposal that would be fatal to Tule Elk or other wildlife to the benefit of ranching operations, and encourage the agency to adopt Option F to discontinue grazing and allow members of the public to enjoy this beautiful park and to be enriched with opportunities to visit and appreciate this special place.

#6400

Name: Watts, Susan

Correspondence: I am writing to urge the National Park Service to discontinue the grazing of beef and dairy cattle at Point Reyes National Seashore. This precious area has been damaged by livestock grazing which poses a threat to the environment and local wildlife and it should be protected and used to serve the public good, and not for the benefit of the livestock industry.

I strongly oppose Option B and any other proposal that would be fatal to Tule Elk or other wildlife to the benefit of ranching operations, and encourage the agency to adopt Option F to discontinue grazing and allow members of the public to enjoy this beautiful park and to be enriched with opportunities to visit and appreciate this special place.

#6401

Name: Harrington, Eileen

Correspondence: When will we learn to preserve wildlife more than animal farming? The time is now. Climate strikes yesterday were about doing radical acts to save the planet and all life on it. We have to change our ways that caused this crisis to begin with. Green house gases such as all those caused by animal production for food need to stop now. Studies show that up to 51% of all greenhouse gases are caused by animals for human and pet food production. Wildlife are constantly sacrificed for animal food for humans production. It is time to stop this now. Preserving the habitat for The Tule Elk is one step towards decreasing climate change and protecting wildlife. Animal farmers are going to have to change their way of living and there are many people who want to help them with this change. In the meantime, Parks departments need to go back to protecting wildlife and not let special interests and the farming of animals get in their way of their original mandate: to protect wildlife and ecosystems.

#6402

Name: Adell, Genevieve

Correspondence: I am writing to urge the National Park Service to discontinue the grazing of beef and dairy cattle at Point Reyes National Seashore. This precious area has been damaged by livestock grazing which poses a threat to the environment and local wildlife and it should be protected and used to serve the public good, and not for the benefit of the livestock industry.

I strongly oppose Option B and any other proposal that would be fatal to Tule Elk or other wildlife to the benefit of ranching operations, and encourage the agency to adopt Option F to discontinue grazing and allow members of the public to enjoy this beautiful park and to be enriched with opportunities to visit and appreciate this special place.

Thank you.

#6403

Name: N/A, N/A

Correspondence: The elk have priority and should not be managed to lower numbers to allow non-native species (cows) to have adequate grazing food. If ranchers, who are living on Federal land want more food for the numbers of livestock they want to support, they should buy it and transport it in. For that matter, why are livestock ranchers allowed to raise cattle (and veal, which is an inhumane practice on top of that) in a Federally protected National Seashore? If anything should be changed, the ranchers should be forced out, allow the land to return to its natural state, and protect the native species.

#6404

Name: Page, Garril

Correspondence: Adherence to the GMP's five key areas of Desired Conditions are an endorsement of Alternative F, and reason to reject Alternatives A,B,C,D, and E. For the following additional reasons, I support Alternative F, reject the selected Alternative B, and ask some questions about the DEIS:

1. Cows are a jarring addition, commonly seen on cattle ranch lands anywhere. I go to Pt Reyes to enjoy the seashore and the land: to see wild elk, whales and seals is an exhilarating and unique experience not found in any other National Park.
2. The landscape for cattle operations is obvious, and obtrusively unlike the natural coastal scrub. Where cattle graze, and where haying occurs, the land is groomed, and lacks plant diversity and visual interest. Plover-killing ravens are attracted by detritus of mowing operations.

3. Cattle are herd animals, large and sharp-hooved, tending to follow closely one upon another as they move around pastures. This adds to erosion and deep scarring of the landscape. In ranging freely, elk abuse the land less.
4. Cow manure is not an enjoyable aspect to encounter: stepping in pies is horrid, the odor is disagreeable and pervasive when manure spraying occurs. There is too much obvious sign of cow manure at Pt Reyes. I found the DEIS Appendices maps showing the extent of beef cattle and dairy operations both eye-opening and shocking. Except for Alt F, the amount of Resource Protection subZones is paltry by comparison. Pt Reyes has a tremendously rich variety of natural landscapes which are better enjoyed without signs of cattle and fences.
5. Ways that active ranching interferes with Visitor enjoyment: ·private property/No Trespassing, and wire fencing are inappropriate on public land; ·veal crates and bereft calves are distressing for most people, unfit for a National Park experience; ·encounters with manure are unwelcome; ·cattle can be enticing, but visitors should not interact with the animals.
6. Interpretive ranching versus active ranching in visitor education and experience: ·details of raising beef for food are best left to interpretive explanation; ·details of veal crates and calves' lives are better left to interpretive presentations; ·details of dairy cows lives are better left to interpretive presentations; ·whereas children might love to try milking, dairying is not safe for public participation.
7. The 24 remaining leases have been extended far beyond the intent of the original agreements. This contravenes the founding legislation.
8. That leases might be transferred to other than the original ranch families, possibly to outside interests, does not accord with the founding legislation or original intent of the parks, Pt Reyes or Golden Gate. That commercial uses and concessionaires might be able to use public lands in these parks is completely inconsistent with my idea of a National Park.

#### Questions re the NPS GMP and DEIS:

1. I see no accounting for male calves in the AUs. Are all liveborn included in assessing the number of cattle on a ranch? If not, why not?
2. ROAs indicate annual inspection. What backup data exist to prove diligence in completion of this task by both reporting rancher and inspecting NPS staff? If this is not public information, why not?
3. Observed erosion and excessive manure may be linked to exceeding allotted numbers of animals. Does publicly available data exist to prove correctly reported number of cattle per ranch, and to prove individual compliance with those reports?
4. Mowing fields might disturb less nesting and burrowing birds and animals if mowing patterns began in the center of fields and continued towards the edges. Could this be specified as a required best practice, BMP, within parklands?
5. Justifying 'removal' of elk herds, are claims the elk are sick and have infected the cattle. The DEIS lists prion-shedding Chronic Wasting Disease (CWD) in Acronyms and Abbreviations of Appendix B. Why is MAP, a.k.a. Johnes' Disease not included in this list? If elk were 'extirpated' then reintroduced, is it not more likely the cattle infected the returning elk? Can NPS data support statements that elk are responsible for transmitting Johnes' disease/MAP to parkland cattle rather than cattle transmitting the disease to the elk herds?
6. I am concerned by conflicting and incomplete references to diseases that may be shared by cows and elk. If appendices and links are searched, there are references to these diseases in the DEIS and separately on the NPS website; why is this information not included in a more cohesive, comprehensive discussion? For example, Appendix B, page B-8 lists CA Dept of Fish & Wildlife (CDFW) link that states CWD has not been detected in

California ["Chronic Wasting Disease." Accessed April 18, 2018.

<https://www.wildlife.ca.gov/Conservation/Laboratories/Wildlife-Investigations/Monitoring/CWD>]. That CWD, known in cervids, is in the transmissible spongiform encephalopathies (TSE) diseases with bovine spongiform encephalopathy (mad cow disease) and scrapie in sheep and goats is information not mentioned in the DEIS. Why? Subsequently, in Appendix B, page B-14, the 1981 "Paratuberculosis in Tule Elk in California" J.Am. Veterinary Md. Assoc. states "(not seen, as cited in NPS 1998a.)" Further, NPs website [https://www.nps.gov/pore/learn/nature/tule\\_elk.htm](https://www.nps.gov/pore/learn/nature/tule_elk.htm) contains the following information: "Of the forty-five elk transported to a holding pen for quarantine near Limantour Beach, twenty-eight animals were cleared for release following screening for Johne's disease. Johne's disease, or paratuberculosis, is a chronic diarrheal disease of domestic livestock and can affect wild ruminants." There is a subsequent Q&A re Johne's Disease on the NPS website; clearly, the NPS has researched and collected data. All these references indicate no CWD or MAP in the tule elk, yet CWD appears in the Acronyms and Abbreviations. Why? And why was mention of Johne's Disease/MAP (Mycobacterium avium paratuberculosis) common to ruminants and spread by feces, omitted from the DEIS except as a reference to reporting requirements of the ROAs?

7. ROAs require reporting of MAP/Johne's disease. Where is the data on prevalence within the park for cattle? For elk?

8. Because Johne's/MAP is spread through feces, and reportedly, can live up to 12 months in soil, the annual spraying of manure is a vector, ensuring the pathogen endures in park lands. Therefore, Alternative F is the most effective path to healing park land. Could ROA restrictions on the spraying halt or control the cycle of contamination of park lands by these pathogens?

9. Reportedly, MAP/Johne's has been found in other ruminants, also in pigs, and may be zoonotic. With some Alternatives in the DEIS proposing row crops and diverse livestock, has NPS considered the potential health risks associated with such introductions into park lands with established Johne's/MAP and potential CWD?

10. Except in areas immediately adjacent to streams, drainages or rivers, how would proposed row-crops and alternative farming be irrigated?

11. Proposals installing for-profit ventures which provide enrichment opportunities for biased and vested members of appointed advisory boards, are a threat that must be recognized and resisted. Given the current Administration's attempts to eradicate independent science, can we have confidence NPS is able to manage these parks for the public benefit?

Thank you for the opportunity to Comment and Question. I look forward to the NPS response to public participation in the DEIS.

#6405

Name: Hay, Jeff and Karen

Correspondence: Hello National Forest Service,

Regarding the California Tule Elk

Discuss how wildlife and natural scenery motivate you to visit Point Reyes and other national parks. Point Reyes National Seashore is supposed to be managed under the Point Reyes Act for "maximum protection, restoration, and preservation of the natural environment." There's no mandate for prioritizing commercial agricultural leases on these public lands. Natural values, native wildlife, public access and enjoyment should take priority over commercial activities at Point Reyes. Tule elk are an important part of the landscape at Point Reyes. Their recovery is a result of successful native ecosystem restoration, which is a key element of the Park Service's mission. It's taken a lot of time, money and effort to restore tule elk to Point Reyes, the only national park where they live. Tule elk should be allowed to roam free and forage in the park - not shot, removed, fenced or treated as problem



animals. Right now the Point Reyes ranches enjoy not only subsidized grazing fees and housing, but also taxpayer-funded infrastructure and road improvements, and publicly funded projects. But commercial activities at Point Reyes should be required to accommodate native wildlife - not the other way around. The Park Service shouldn't allow any new agricultural activities at Point Reyes. Planting artichokes or other row crops will attract birds. And introducing sheep, goats, pigs or chickens will attract native predators such as coyotes, bobcats and foxes. Expanded ranching would only create new wildlife conflicts. Cattle ranching should only be allowed if it's consistent with preserving the natural environment. And agricultural activities such as mowing shouldn't be allowed in park areas where they harm endangered species or wildlife habitat, impair water quality, cause excessive erosion or spread invasive plants/diseases. Cattle are the seashore's primary source of greenhouse gases. So the Park Service's preferred alternative is inconsistent with its own "Climate Friendly Parks" plan.

#6406

Name: Rhodes, Janet

Correspondence: I am writing to urge the National Park Service to discontinue the grazing of beef and dairy cattle at Point Reyes National Seashore. This precious area has been damaged by livestock grazing which poses a threat to the environment and local wildlife and it should be protected and used to serve the public good, and not for the benefit of the livestock industry.

I strongly oppose Option B and any other proposal that would be fatal to Tule Elk or other wildlife to the benefit of ranching operations, and encourage the agency to adopt Option F to discontinue grazing and allow members of the public to enjoy this beautiful park and to be enriched with opportunities to visit and appreciate this special place.

Thanks for your time.

#6407

Name: Lee, Heather

Correspondence: These comments supplement those I previously submitted.

I support Alternative F, phasing out cattle and dairy industry and returning the land to its natural state. The enabling legislation of the National Seashore supports wildlife protection and does not mention upholding private industry. The original leases to ranchers were to be 25 years. Ranchers have already been paid handsomely for their land, so it is long overdue to phase out the ranches. "Cultural Resource" and "Historic" does not mean industry needs to be currently in operation.

Ranching on this public land (particularly when sustained only through taxpayer subsidy) is poor public policy and unsustainable, both from an economic and environmental standpoint. The e ranches have been causing significant adverse impacts to the National Seashore lands and habitat.

Tule Elk should be protected for the survival of their species. The National Park should be protecting all Tule Elk, and allowing new herds to form and to TAKE DOWN THE FENCE at Pierce Point and allow all Tule Elk to roam free.

I strongly oppose granting 20 year leases to cattle and dairy industry. Climate science has indicated we have less than 12 years to mitigate the worst of climate catastrophe. Allowing business that has been linked to water pollution, species extinction and in Point Reyes is the culprit of over 60% of the greenhouse gas emissions, it is not a good idea to give that same industry a 20-year lease to continue degrading our national park. Point Reyes is a refuge to thousands of plants and animals. Point Reyes can be a leader in the fight for climate justice, and it starts with phasing out Beef and Dairy operations and restoring the land to its natural state.

The EIS does not satisfy NEPA's legal requirements. The EIS has NO MENTION of the effects of climate change , and does not include any information of the cattle and dairy's impact on climate change within the park or the larger environment. These impacts must be fully and fairly evaluated. This includes, without limitation, transportation, air and water quality, water supply, biological resources (including species and their habitat), hazardous materials and climate change impacts associated both with the use of the land for animal agriculture and the larger effects of food production and deliver based on these practices.

#6408

Name: Brittingham, Steve

Correspondence: Every biological inventory of plant and animal species in the US indicates a loss of specie numbers and diversity due to habitat loss. This is amplified world wide as we are moving, even abetting at every point, the destruction of the rich bounty of life we have inherited even with the destructive practices of the past taken into consideration. The continuation and expansion of the dairy farms and ranching further into Point Reyes is indefensible on every level other than political expediency. The National Park Service mission is not to maintain and enhance private profit at the expense of the lands it is supposed to, by law, maintain unimpaired for future generations.

However I realize I am wasting my time knowing the political pressures of local politicians and, nationally, we have political commissars running our federal agencies that are committed to rewarding the few at the expense of the public and the future.

I am writing to urge the NPS, in strongest terms, to begin fazing out activities that degrade and destroy our national parkland as was the original agreement when the federal government purchased that land with the intent of preserving the habitat and species found at Point Reyes.

Thank you.

#6409

Name: Cooper, Ruth

Correspondence: Spare the elk. Use nonlethal birth control methods

#6410

Name: Bradshaw, G.A.

Correspondence: There is only one acceptable solution: remove the Cows and do not harm the Elk. This is advised by policy, law, and science. I speak to the science since that is my area of expertise. All of the planet, no matter how "wild" and "untouched" it may appear, is suffering and being degraded. This is not only scientifically demonstrated by a vast literature, but plain common sense. U.S. land "management" has never followed ecological principles. There is no "pulse" of human activity which might fit in and emulate natural patterns, only relentless "press" which, as mass extinctions and climate change illustrate, have disastrous consequences. As all of science research shows, Animals have comparable brain, mind, and consciousness comparable to humans. This means Elk and other species are vulnerable to psychological and physiological trauma which transmits socially, neurobiologically and epigenetically. Elk and other wildlife may look intact on the outside but they too, like the ecosystems in which they live, are spirally to psychological if not physical extinction. This is documented by my own and other researchers in the most scientifically prestigious journals so it cannot be brushed off as "speculative." It is incumbent of government researchers and policymakers to be advised by the entirety of science, not selectively choose what suits them. The Elk must not be harmed- moved or killed- and the Cows must be given sanctuary as they are sentient beings as well. Further, the natural area must be expanded to bring Elk and other Wildlife habitat to its original health and size prior to colonial occupation. G.A. Bradshaw Ph.D Ph.D The Kerulos Center for Nonviolence

#6411

Name: Ohlendorf, Richard

Correspondence: I am writing to to urge you to adopt Alternative F, which would discontinue farming and ranching opportunities in the park and expand visitor opportunities. The preservation of native wild species must take precedence over farming and ranching activities. I wish to remind you that grazing negatively affects ecosystems, causing water pollution and soil erosion, spreading invasive species and disease, and harming endangered species.

Please do the right thing and adopt Alternative F as the people want.

Thank you in advance.

#6412

Name: Ohlendorf, Carol

Correspondence: I am writing to to urge you to adopt Alternative F, which would discontinue farming and ranching opportunities in the park and expand visitor opportunities. The preservation of native wild species must take precedence over farming and ranching activities. I wish to remind you that grazing negatively affects ecosystems, causing water pollution and soil erosion, spreading invasive species and disease, and harming endangered species.

Please do the right thing and adopt Alternative F as the people want.

Thank you in advance.

#6413

Name: N/A, Heather

Correspondence: I am writing to urge the National Park Service to discontinue the grazing of beef and dairy cattle at Point Reyes National Seashore. This precious area has been damaged by livestock grazing which poses a threat to the environment and local wildlife and it should be protected and used to serve the public good, and not for the benefit of the livestock industry.

I strongly oppose Option B and any other proposal that would be fatal to Tule Elk or other wildlife to the benefit of ranching operations, and encourage the agency to adopt Option F to discontinue grazing and allow members of the public to enjoy this beautiful park and to be enriched with opportunities to visit and appreciate this special place.

#6414

Name: Bordisso, Kate

Correspondence: Please work hard to encourage environmental considerations when allowing ranching in West Marin. We need balance, which I thought we had now.

#6415

Name: Shoemaker, Donna

Correspondence: I attended the Public Comment meeting in Sausalito a couple of weeks ago, and heard explanations of all the Alternatives.

What disturbs me is that there is an alternative that was barely ... if at all ... mentioned, and the public was mostly not even informed of it. This involves moving the current Drakes Estero elk herd down in to the Limantour

Wilderness area, where there is much more room, and comparatively few elk already there. I can't imagine that this would be much more (if at all) expensive for the Part, than the current ongoing years-long expense of struggling with the elk-ranch problem. This would save the Drakes Estero area from elk impact, (and I believe ... save the Spaletta Ranch as well), and would be a win-win for both the Park and the ranches.

I urge the Park to consider moving the Drakes herd to the Limantour Wilderness, and providing elk-proof fencing (I believe this is what has been used at Tomales Point), to keep the herd from migrating back up to Drakes Estero.

Sincerely, - Donna Shoemaker

#6416

Name: watters, cheryl

Correspondence: Point Reyes National Seashore is supposed to be managed under the Point Reyes Act for "maximum protection, restoration, and preservation of the natural environment." There's no mandate for prioritizing commercial agricultural leases on these public lands. Natural values, native wildlife, public access and enjoyment should take priority over commercial activities at Point Reyes. Tule elk are an important part of the landscape at Point Reyes. Their recovery is a result of successful native ecosystem restoration, which is a key element of the Park Service's mission. It's taken a lot of time, money and effort to restore tule elk to Point Reyes, the only national park where they live. Tule elk should be allowed to roam free and forage in the park - not shot, removed, fenced or treated as problem animals. Right now the Point Reyes ranches enjoy not only subsidized grazing fees and housing, but also taxpayer-funded infrastructure and road improvements, and publicly funded projects. But commercial activities at Point Reyes should be required to accommodate native wildlife - not the other way around. The Park Service shouldn't allow any new agricultural activities at Point Reyes. Planting artichokes or other row crops will attract birds. And introducing sheep, goats, pigs or chickens will attract native predators such as coyotes, bobcats and foxes. Expanded ranching would only create new wildlife conflicts. Cattle ranching should only be allowed if it's consistent with preserving the natural environment. And agricultural activities such as mowing shouldn't be allowed in park areas where they harm endangered species or wildlife habitat, impair water quality, cause excessive erosion or spread invasive plants/diseases. Cattle are the seashore's primary source of greenhouse gases. So the Park Service's preferred alternative is inconsistent with its own "Climate Friendly Parks" plan.

#6417

Name: Chavez, Felicia

Correspondence: As a resident of Marin County, I support any policy that helps Marin County to be self-sustaining with regard to organic, sustainable agriculture, using practices that minimally impact native plant and animal species with robust populations, and that do not impact plant and animal species that are threatened or endangered. Thank you.

#6418

Name: Feldman, Ruth

Correspondence: I write to urgently request that the Tule Elk, recovered from the brink of extinction at Point Reyes-at great taxpayer expense, effort, and care-Elk at Our National Park and in no other place in all the world, be allowed to live and roam freely. Please adhere to our Mission Statement; preserve the natural wildlife and lands This mandate does NOT prioritize commercial interests, agricultural pursuits such as leasing of our precious public lands to ranchers for cattle grazing; nor should the lands be mowed or seeded to raise crops for sale. NO activities which degrade the land or impinge on the natural and scenic value of native creatures, their habitat, the balanced ecosystem ...should be allowed.

I visit and treasure Point Reyes, (I know and treasure Marty Griffin and his great work of preservation of our treasured ecosystem); I repeatedly bring my family members, visiting from the east coast, and my guests from

Europe and Asia, to Point Reyes. But if you should extend cattle leases to trample the land and degrade the earth, the waters, and the air to further commercial/agricultural enterprises, we stand to lose irreplaceable treasures ; please do not act before<sup>4</sup> considering the devastating changes you will promulgate; think 'seventh generation' effects. Do not bow to ranchers and mendacity. The dire results will cause irreparable and irreplaceable damage!

#6419

Name: Hyde, Hilary

Correspondence: The park should not contain beef farms. And they don't even pay property tax! Terrible pollution (worse than oysters). This park is for the public, not private landowners. We are consuming less beef as well. You have forgotten the original mission - public access. Not select private owners.

Increase trails and access for bicycles.

#6420

Name: wedding, dress

Correspondence: Please do not shoot any tule elk. They were here long before ranchers, as were the Coastal Miwok peoples who have been displaced through systemic violence. I will avoid visiting the park and sending visitors if the shooting is allowed.

#6421

Name: hilton, sue

Correspondence: The most important consideration in managing any land right now, including Pt. Reyes and Golden Gate, should be how can we best use this opportunity to reduce greenhouse gases and sequester carbon. This lease renewal could be a wonderful opportunity to do that. Ranching and Dairying can be managed to sequester carbon by increasing soil carbon, or, alternatively, free-ranging elk with minimal management might also increase soil carbon. Please expand the EIS to consider these alternatives and give greenhouse gases, and the future of the planet, the importance they deserve in making this decision

#6422

Name: Mangone, Wendy

Correspondence: I'm truly shocked to hear that such a progressive and informed organization like yourselves would stoop to rancher pressure and actually turn against NATIVE wildlife in favor of the practice of cattle ranching that is not only cruel but one of the top two reasons for the environmental disaster that is climate change!! Please do the right thing and DO NOT kill the native elk.

Take a stand! Thanks so much.

#6423

Name: Carson, J

Correspondence: We love the elk but we love staying healthy with our precious organic local dairy farms. Please protect both!

#6424

Name: Gondell, Robert

Correspondence:

All the ranching alternatives in the Draft Environmental Impact Statement involve the impairment of natural resources. Three National Park Service laws prohibit actions that will impair natural resources (the 1916 NPS Organic Act, Point Reyes National Seashore legislation Section 459c-6, and Golden Gate National Recreation Area legislation Section 460bb). Consequently, the Park Service should prepare a supplemental DEIS with ranching alternatives that comply with applicable laws requiring the protection of natural resources. The Park Service should then circulate that supplemental DEIS for public comment.

#6425

Name: Squires, Joan

Correspondence: It is so upsetting to hear another incident of cattle ranchers having a negative effect on other animals living in the wild. Shooting Tule Elk should not be allowed, even if they stray outside of their small space given to them to live on. Cattle ranchers are slowly taking over all our public lands so they can graze their cattle free while they remove the wild animals that should be living on these lands. The majority of Americans are against the removal of wild animals from public lands for cattle ranchers to graze free. In a "real Democracy" the majority rules. What has gone wrong in America that has allowed the few in power to have their way!

#6426

Name: Dellert, Joseph

Correspondence: The mission of the national parks is to preserve the natural beauty of landscape. Tule elk are native to the point reyes seashore and should not be removed. The cattle ranchers need to seed lands to allow the healing of the region.

#6427

Name: Boreyko, Micaela

Correspondence: I am writing to urge the National Park Service to discontinue the grazing of beef and dairy cattle at Point Reyes National Seashore. This precious area has been damaged by livestock grazing which poses a threat to the environment and local wildlife and it should be protected and used to serve the public good, and not for the benefit of the livestock industry.

I strongly oppose Option B and any other proposal that would be fatal to Tule Elk or other wildlife to the benefit of ranching operations, and encourage the agency to adopt Option F to discontinue grazing and allow members of the public to enjoy this beautiful park and to be enriched with opportunities to visit and appreciate this special place.

#6428

Name: N/A, Carol

Correspondence: Cattle and other livestock do not belong on a national park. Seeing baby cows in veal crates is upsetting and not the experience a park visitor wants or expects. Please disallow the beef and dairy industries from destroying this national treasure and protect the Tule elk from killing and other threats to their lives. The park service needs to stop coddling and subsidizing the cruel beef and dairy industries.

#6429

Name: Jensen, Kevin

Correspondence: COMMENTS GENERAL MANAGEMENT PLAN EIS September 21, 2019

INTRODUCTION Thank you for the opportunity to comment on the Draft Environmental Impact Statement (DEIS) for a General Management Plan Amendment (GMPA) for the management of areas of Point Reyes National Seashore (PRNS) and Golden Gate National Recreation Area (GGNRA) now managed for dairy farming

and beef cattle ranching and full-time residential use. My position is that all the ranching alternatives involve the impairment of natural resources and that three NPS laws prohibit actions that will impair natural resources. Consequently, the Park Service should prepare a supplemental DEIS with ranching alternatives that comply with applicable laws requiring the protection of natural resources and it should then circulate that supplemental DEIS for public comment. APPLICABLE LAWS PRNS and GGNRA are units of the national park system and, as such, must be managed primarily to protect the natural resources of the parks. The three applicable laws in this regard are as follows: The first is the 1916 NPS Organic Act which applies to all units of the national park system, including PRNS and GGNRA. The Organic Act provides as follows: § 100101 (a) In General-The Secretary . . . shall promote and regulate the use of the National Park System by means and measures that conform to the fundamental purpose of the System units, which purpose is to conserve the scenery, natural and historic objects, and wild life in the System units and to provide for the enjoyment of the scenery, natural and historic objects, and wild life in such manner and by such means as will leave them unimpaired for the enjoyment of future generations. 54 U.S.C. § 100101(a). (Emphasis added.) With respect to the Organic Act, the Ninth Circuit Court of Appeals has held that the language quoted above means 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). The other two laws are the PRNS and GGNRA statutes. The PRNS legislation provides, in pertinent part, as follows: § 459c-6. Administration of property(a) Protection, restoration, and preservation of natural environment Except as otherwise provided in sections 459c to 459c-7 . . . the property . . . shall be administered by the Secretary without impairment of its natural values, in a manner which provides for such recreational, educational, historic preservation, interpretation, and scientific research opportunities as are consistent with . . . the maximum protection, restoration, and preservation of the natural environment within the area . . . 16 U.S.C. § 459c-6. (Emphasis added.) The GGNRA legislation provides, in pertinent part, as follows: §460bb - EstablishmentIn order to preserve for public use and enjoyment certain areas of Marin and San Francisco Counties, California, possessing outstanding natural, historic, scenic, and recreational values, and in order to provide for the maintenance of needed recreational open space necessary to urban environment and planning, the Golden Gate National Recreation Area (hereinafter referred to as the "recreation area") is hereby established. In the management of the recreation area, the Secretary ... shall utilize the resources in a manner which will provide for recreation and educational opportunities consistent with sound principles of land use planning and management. In carrying out the provisions of this subchapter, the Secretary shall preserve the recreation area, as far as possible, in its natural setting, and protect it from development and uses which would destroy the scenic beauty and natural character of the area.16 U.S.C. § 460bb. RANCHING'S IMPACTS ON NATURAL RESOURCES REQUIRE A NEW SUPPLEMENTAL EIS The DEIS makes it clear that continued cattle ranching as proposed in the current ranching alternatives will have detrimental environmental consequences on all natural resources, including soils, water quality, air quality, vegetation and wildlife (especially elk). Consequently, all the ranching alternatives violate the Park Service's duties under the three statutes and are therefore unlawful. Under these circumstances it makes no sense for the Park Service to go forward with a Final EIS. In view of the above, the Park Service needs to develop new ranching alternatives that do not violate the three laws quoted above and recirculate a supplemental DEIS for public comment. It should provide that all ranching operations that are permitted to operate in the PRNS and GGNRA should be modified so that going forward there are no negative impacts on the water quality and that range condition improves to good or excellent condition throughout the entire pastoral zone.

In the new alternatives, I oppose any diversification in the pasture subzone. There is no reason to allow hay, haylage and silage, and chickens, sheep and goats outside the ranch core. Such activities will have detrimental environmental consequences and have no purpose other than to increase ranch revenue. I also oppose continued leasing of any ranches if the current lessee or family does not renew the lease. The new alternatives must identify the source of funds to fully implement the alternative and the effects of any reduction in funding on any other existing programs must be described. The FEIS should assume no increase in overall funding for PORE to pay for the implementation of the selected alternative, since PORE funding in real dollars has been declining for some years.

Name: McLaughlin, Brian

Correspondence: Lyrics there are too many cows that affect the soil the water quality the creeks and the wildlife. horses also need to be monitored and kept out of creeks and from making new trails along the Bear Valley trail where they adversely impact riparian vegetation and the management does nothing about. that is the horses have been making a legal trails to Creeks through the right. Vegetation trampling it and making new trails. several attempts over the last 10 years to management of the park have yielded no results and worsening conditions. cows need to be limited and Ray's lightly and kept out of all creeks and watersheds.

#6431

Name: Zennaro, Marco

Correspondence: I support ALTERNATIVE E, F, D (in order of preference, with E being my favorite). Please do NOT extend ranching.

#6432

Name: Clark, Craig

Correspondence: No more war. Strike for peace. Topple the war economy.

#6433

Name: N/A, N/A

Correspondence: After reviewing the EIS document, it seems there is limited to no information on why capping the Elk population provides an environmental benefit. One of the main reasons I visit Point Reyes is in hopes of encountering/observing the herd, which is a tremendous privilege to those who are able to visit the park. My opinion is that Alternative F is the best option because it retains the space meant for visitors and allows both Elk herds to thrive unimpeded. It also presents an opportunity for Park Services to educate visitors on how to appropriately/safely deal with Elk encounters, while stressing the importance of keeping the area in its natural condition.

#6434

Name: Marriott, Pat

Correspondence: To the NPS:

I am strongly opposed to killing native elk to make room for cattle.

Point Reyes and all its wild land and wildlife is a PRESERVE. That word alone tells us to keep it free from private interests. It belongs to all of us.

Too many of our national lands and monuments are being sacrificed to businesses, e.g., for mining, oil and gas. Millions of species are becoming extinct. And, as you well know, cattle ranching contributes to climate change. Please don't add to these ecological disasters!

I urge you to please abandon this ill-considered idea and keep Point Reyes for the purpose it was intended: a unique and precious ocean-side preserve, open for public enjoyment where native plants and animals are protected for future generations.

Thank you for your consideration.

#6435

Name: watters, Whitney



Correspondence: Point Reyes National Seashore is supposed to be managed under the Point Reyes Act for "maximum protection, restoration, and preservation of the natural environment." There's no mandate for prioritizing commercial agricultural leases on these public lands. Natural values, native wildlife, public access and enjoyment should take priority over commercial activities at Point Reyes. Tule elk are an important part of the landscape at Point Reyes. Their recovery is a result of successful native ecosystem restoration, which is a key element of the Park Service's mission. It's taken a lot of time, money and effort to restore tule elk to Point Reyes, the only national park where they live. Tule elk should be allowed to roam free and forage in the park - not shot, removed, fenced or treated as problem animals. Right now the Point Reyes ranches enjoy not only subsidized grazing fees and housing, but also taxpayer-funded infrastructure and road improvements, and publicly funded projects. But commercial activities at Point Reyes should be required to accommodate native wildlife - not the other way around. The Park Service shouldn't allow any new agricultural activities at Point Reyes. Planting artichokes or other row crops will attract birds. And introducing sheep, goats, pigs or chickens will attract native predators such as coyotes, bobcats and foxes. Expanded ranching would only create new wildlife conflicts. Cattle ranching should only be allowed if it's consistent with preserving the natural environment. And agricultural activities such as mowing shouldn't be allowed in park areas where they harm endangered species or wildlife habitat, impair water quality, cause excessive erosion or spread invasive plants/diseases. Cattle are the seashore's primary source of greenhouse gases. So the Park Service's preferred alternative is inconsistent with its own "Climate Friendly Parks" plan.

#6436

Name: Acebo, Ryan

Correspondence: Point Reyes National Seashore is supposed to be managed under the Point Reyes Act for "maximum protection, restoration, and preservation of the natural environment." There's no mandate for prioritizing commercial agricultural leases on these public lands. There should be a better long-term plan for the Elk other than just killing them when their population gets to an arbitrarily high number. Natural values, native wildlife, public access and enjoyment should take priority over commercial activities at Point Reyes. Right now the Point Reyes ranches enjoy not only subsidized grazing fees and housing, but also taxpayer-funded infrastructure and road improvements, and publicly funded projects. But commercial activities at Point Reyes should be required to accommodate native wildlife - not the other way around. Cattle ranching should only be allowed if it's consistent with preserving the natural environment. And agricultural activities such as mowing shouldn't be allowed in park areas where they harm endangered species or wildlife habitat, impair water quality, cause excessive erosion or spread invasive plants/diseases.

#6437

Name: Chilvers, Kim

Correspondence: I am very disturbed by the park systems plan to reduce or eliminate the Tule Elk in favor of cattle ranching. I understand that there are few natural predators for the elk but encouraging killing a rare species at this time of extinction is the wrong move. Please consider the larger eco-system contexts and the need to value all species in this decision. The park system is a designated place for nature not for farming and ranching. Thank you

#6438

Name: Stein, Jan

Correspondence: All the ranching alternatives in the Draft Environmental Impact Statement involve the impairment of natural resources. I urge the park service to consider adopting progressive approaches and modeling solutions to climate change. We don't need more cattle or beef. Please leave the Tule Elk alone and preserve land.

#6439

Name: Fetherolf, Sara

Correspondence: Private cattle and dairy industry has no place on public land. I would like to see efforts to support the native Tule Elk and to restore the land to a natural state.

#6440

Name: Boehm, Sigrid

Correspondence: The Park Service should prepare a supplemental DEIS with ranching alternative that comply with applicable laws requiring the protection of Natural Resources. The Park Service then circulate that supplement DEIS for public comment

#6441

Name: Potratz, Cameron

Correspondence: Please support a plan for Point Reyes that will help conserve and protect this beautiful rare stretch of California coastline so close to major US cities. Our public lands are for all to enjoy, not a select few to buy and commercialize, killing local animals. There is plenty of National Forest land available not far away for commercial enterprise, but Point Reyes is very special and ought to be treated as such. I will continue to vote and support those who protect this land and encourage my friends to do the same.

#6442

Name: Morrow, Peter

Correspondence: As a member of the California-based international animal protection nonprofit organization In Defense of Animals with over 250,000 supporters, I oppose the National Park Service plan to kill native Tule elk, grow commercial crops, and permit ranchers to add chickens, turkeys, sheep, pigs, and goats to their exploitative operations. For this reason, I support Alternative F.

As national park land, this property was specifically set aside to protect, restore, and preserve the natural environment including the wild animals who live there. The original intention was to phase out dairy and cattle ranching, not add more crops or animals to increase ranching profits.

The proposed plan does not address the damage from grazing, including water-quality degradation and soil erosion. Also, adding new crops will create more conflicts with native wild animals.

Please abandon this inhumane and destructive plan by selecting Alternative F. I urge you to restore the Seashore's Pastoral Zone for wild animal habitat and repurpose historic ranch buildings for scientific research, interpretation, and public education.

#6443

Name: Hodes, Adam

Correspondence: I'm writing to support the public access and bicycling improvements outlined under Alternatives B, C, D, E, and F. I strongly support proposals that would lead to the planning and implementation of bicycling routes on trails, ranch roads, and pathways throughout the planning area, including but not limited to: 1) a connection between Devil's Gulch and Platform Bridge Road using existing ranch roads, 2) a connection between Bolinas Ridge Trail at Olema Hill and Point Reyes Station to serve as an interim connection for the Cross Marin Trail, 3) a connection between Bolinas Ridge Trail and Five Brooks Stables using existing ranch roads 4) a connection between Drakes Estero and Abbotts Lagoon Trail using existing ranch roads, 5) a connection between Marshall Beach Trailhead and Pierce Point Road using existing ranch roads, and 6) an Estero Trail loop using existing ranch roads. I encourage NPS to collaborate with ranchers and other stakeholders to educate the public and address concerns related to public access on working ranch lands.

The improvements outlined above would enable and encourage me to visit the Seashore more regularly-and by bike, rather than car. I would feel much safer riding in the Seashore and surrounding areas on trails, pathways, and ranch roads, rather than on roads shared with fast-moving vehicular traffic. Bicycling opportunities are currently very limited and fragmented, so any improvements in connectivity and the creation of new loop options would enable me to enjoy more of the Seashore and surrounding areas by bike.

#6444

Name: N/A, Celeste

Correspondence: I support Alternative F, phasing out cattle and dairy industry and returning the land to its natural state. The enabling legislation of the National Seashore supports wildlife protection and does not mention upholding private industry. The original leases to ranchers were to be 25 years. Ranchers have already been paid handsomely for their land, so it is long overdue to phase out the ranches. "Cultural Resource" and "Historic" does not mean industry needs to be currently in operation. Don't let YOUR political legacy be the extinction of the local Tule Elk.

#6445

Name: Hirvela , Marilyn

Correspondence: Please do not allow cattle grazing on this property. Your priority should be to protect the natural area and animals there. Please do not renew their permit.

#6446

Name: Barr, Anne

Correspondence: I share the Sierra Club's concerns with this draft plan amendment.

All the ranching alternatives in the Draft Environmental Impact Statement involve the impairment of natural resources. However, three National Park Service laws prohibit actions that will impair natural resources (the 1916 NPS Organic Act, Point Reyes National Seashore legislation Section 459c-6, and Golden Gate National Recreation Area legislation Section 460bb).

Accordingly, the Park Service should prepare a supplemental DEIS with ranching alternatives that comply with applicable laws requiring the protection of natural resources. The Park Service should then circulate that supplemental DEIS for public comment.

Thank you for your attention to this important matter.

#6447

Name: Wellin, Paul

Correspondence: I strongly oppose Option B and any other proposal that would be fatal to the 5,000 cattle who are being exploited for beef and dairy production in Pt. Reyes. Several NPS proposals include killing the native Tule Elk in order to continue grazing livestock. This is absurd!

I encourage the agency to adopt Option F to discontinue grazing and allow members of the public to enjoy beautiful Pt. Reyes park and to be enriched with opportunities to visit and appreciate this special place. Grazing poses a threat to the environment, wildlife, and the public good.

#6448

Name: Dreyfuss, Jeramie

Correspondence: Please protect the Point Reyes elk. I wish we could protect all of our wildlife. No, I do not eat meat and I love all animals. Please protect them.

#6449

Name: Burns, Amy

Correspondence: Please adopt Alternative F, (which will discontinue farming and ranching opportunities in the park and expand visitor opportunities). The preservation of native wild species must take precedence over farming and ranching activities. Grazing negatively affects ecosystems, causing water pollution and soil erosion, spreading invasive species and disease, and harming endangered species.

#6450

Name: N/A, N/A

Correspondence: I support Alternative F, phasing out cattle and dairy industry and returning the land to its natural state. For-profit businesses have no place on public land. These ranches have already negatively impacted the land, allowing soil erosion, scarring in the landscape, as well as e.coli contamination in waterways. Point Reyes National Seashore is a National Park and should be protecting the Tule Elk, not animal agriculture.

#6451

Name: N/A, N/A

Correspondence: From the EIS it seems clear the Alternative F is the preferred solution and I therefor strongly support it.

The study shows that Alternative F is best for the soil, water quality, vegetation, air quality, wildlife and of course the tule elk. Yes there would be some socioeconomic impact, but national parks are not the place where these factors should have a priority. In this time where the climate crisis is critical to our way of life it is unconscionable to continue a destructive practice that generates greenhouse gas in our key national park. It is very strange that the word 'climate change' does not even appear in the EIS, and that the greenhouse gas emissions caused by the ranching is relegated the air quality section.

Especially in our region where we see the impact of climate change all the time with deadly wildfires, we need to take action. The negative socioeconomic impact of the fires are much larger than the benefits due to the ranching. Yes, I know they are not equivalent, but we need to take action everywhere. What better place to start than in Point Reyes national seashore. I strongly recommend to go with Alternative F.

#6452

Name: Cummings , Tracy

Correspondence: All the ranching alternatives in the Draft Environmental Impact Statement involve the impairment of natural resources. Three National Park Service laws prohibit actions that will impair natural resources (the 1916 NPS Organic Act, Point Reyes National Seashore legislation Section 459c-6, and Golden Gate National Recreation Area legislation Section 460bb). Consequently, the Park Service should prepare a supplemental DEIS with ranching alternatives that comply with applicable laws requiring the protection of natural resources. The Park Service should then circulate that supplemental DEIS for public comment

#6453

Name: Smith, Deidra

Correspondence: It's taken a lot of time, money and effort to restore tule elk to Point Reyes, the only national park where they live. Tule elk should be allowed to roam free and forage in the park - not shot, removed, fenced or treated as problem animals.

Right now the Point Reyes ranches enjoy not only subsidized grazing fees and housing, but also taxpayer-funded infrastructure and road improvements, and publicly funded projects. But commercial activities at Point Reyes should be required to accommodate native wildlife - not the other way around.

This is unconscionable. Tax dollars should never be used to fund global heating. Millions are joining school strikes to fight the climate crisis. Dairy and meat corporations pollute more greenhouse gases than all the cars, planes, ships and trains around the world. Dietary change is essential if global warming is not to exceed 2°C. ([http://www.chathamhouse.org/sites/files/chathamhouse/field/field\\_document/20141203LivestockClimateChangeBaileyFroggattWellesley.pdf](http://www.chathamhouse.org/sites/files/chathamhouse/field/field_document/20141203LivestockClimateChangeBaileyFroggattWellesley.pdf))

Recent studies warn that every non-agricultural industry must achieve "impossible" zero-carbon emissions to avoid catastrophic global heating in excess of 2°C just to offset industrial agriculture - with "livestock" a major contributor. (<http://www.nature.com/nclimate/journal/v4/n10/full/nclimate2353.html> and <http://link.springer.com/article/10.1007/s10584-014-1104-5>)

A new study warns the global average temperature could rise by as much as 7°C. (<https://www.newsweek.com/climate-change-temperature-rise-seven-degrees-new-un-report-1459666>)

#6454

Name: CARTER, Diane

Correspondence: No cattle=increased chance of wildfires. Listen to Phyllis Faber, one of the most informed and intelligent voices of Marin.

#6455

Name: Rothbart, Ron

Correspondence: I vote for Alternative F, which phases out ranching over five years and allows the Tule elk to expand their range in the park.

A National Park should have the protection of the natural world, including wildlife, as its highest priority. But the preferred alternative in the Pt. Reyes draft management plan includes expanding dairy ranching in the seashore and killing Tule elk to do so. This is unconscionable. A national park should protect its wildlife, not the ag industry. Point Reyes is the only national park where we can see these animals, which are down to 1% of their original population. The park should protect them, not the ranches!

Its time to phase out an industry that pollutes and degrades our public land. The park should revoke permits for all cattle and dairy operations and restore the leased land to its original, pre-industry state. Ranching continued after Pt. Reyes became a National Seashore, but the understanding was that the continuance of ranching was to be temporary. When Point Reyes became a National Park in 1962, the federal government paid millions of dollars to the ranchers to purchase their land. They were given 25-year leases and were then to be phased out of the park. Their original leases have long expired.

Now the Parks Department is considering a 20-year extension and giving ranchers additional options for commercial activity, such as providing tours and homestays at ranches. Like most people, I go to the Seashore for the natural beauty, not to see dairy ranches. There are plenty of dairy ranches in Marin and nearby counties that could provide homestays and tours if there actually were a demand for that. There's no need to preserve working ranches within Pt. Reyes. To the extent that there is some interest in the history of ranching, the buildings at Pierce Point ranch provide for that. The ranch buildings and infrastructure are historic, not the cows. People don't really come to the Pierce Point area to see working dairy ranches; they come to see elk and other wildlife.

Allowing the ranchers to diversify, raise pigs, sheep, and chickens as well as cows, will only add feces to a park already saturated with livestock manure. Already, cattle ranching has done massive environmental damage: miles of barb wire fences, killed wildlife, poo-ponds, pee-creeks, and terrible erosion. The ranches have been documented to be the highest emitter of greenhouse gases. The manure runoff has contaminated some of the most precious waterways including where the coho salmon spawn and the elephant seals raise their pups. It has been documented that the ranches spread noxious weeds and limit the wildlife and biodiversity where they operate. Any diversification of ranching operations will only serve to attract more predators like coyotes, foxes, bobcats that will be in conflict with ranch operations and have to be managed as well.

Finally, there's no good economic rationale for maintaining the ranches. The money that the park brings to local businesses through tourism dwarfs money generated by the dairies.

#6456

Name: Longstreth, Carolyn

Correspondence: The following comment is submitted on behalf of the Marin Chapter of the California Native Plant Society (Marin CNPS). The comment pertains to the Draft Environmental Impact Statement (DEIS) for the General Management Plan Amendment (GMPA) for the Point Reyes National Seashore (PRNS or Seashore).

The California Native Plant Society is an organization of nearly 10,000 members statewide dedicated to conserving native plants and their natural habitats and to increasing the understanding, appreciation, and horticultural use of native plants. Since its inception in 1968, CNPS's Rare Plant Program has been a trusted resource for scientific accuracy and integrity. CNPS rare plant data are widely accepted as the standard for information on the rarity and endangerment status of the California flora. These data are incorporated into CNPS's Rare Plant Inventory, another authoritative resource on California's rare and endangered plants. Now in its 8th edition online, the Inventory continues to play an important role in scientific research, conservation planning, and the effective enforcement of environmental laws.

The CNPS Vegetation Program, for its part, has established a vegetation classification system that has become the standard for interpreting statewide vegetation patterns and for initiating local and regional ecological assessments. The program continues to expand this knowledge and to inform conservation and land-use planning throughout the state.

The Marin chapter, with its 500 members, monitors land use issues affecting Marin's vegetation and rare species. We regularly comment on planning efforts undertaken by county, state and national agencies. Here, we limit our comments to those that are directly or indirectly related to native plants and plant communities in the planning area. A. Introduction & Legislative Intent The GMPA presents the Seashore with a unique opportunity to evaluate the impacts of ranching in the pastoral zone and to reach informed conclusions on the optimum management of these lands and how such uses can best carry out the purposes of PRNS and its ranchlands.

The continuation and management of ranching in the Seashore must conform to the overarching mission of the NPS, as stated in the 1916 Organic Act, as well as the Seashore's own enabling legislation. Indeed, we submit that the DEIS wrongly dismissed the notion that natural resource protection goals should shape the GMPA because the NPS is also required to conserve cultural resources and public use and enjoyment. DEIS at 59. To the contrary, a close review of the Seashore's legislative history demonstrates that although the ranches are a cultural or historic resource, their preservation and management must advance and not weaken the Seashore's overall purpose of natural resource protection and enhancement.

The Organic Act provides that the mission of the national parks is to conserve the scenery and the natural and historic objects and the wild life 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. 16 USC 1. For its part, the 1962 enabling legislation declared that the PRNS was established to save and preserve for purposes of public recreation, benefit and inspiration, a portion of the diminishing seashore of the United States that remains

undeveloped& . 16 USC Sec. 459c. Congress later elaborated on this statement by requiring the Department of the Interior to administer its Point Reyes lands 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 USC Sec. 459c (6)(a) [emphasis added].

While Congress declined to terminate ranching at the time it created the PRNS, it is a common misconception that it intended ranching in the Seashore to be permanent. To the contrary, the original enabling legislation allowed the ranches to remain for a period of only fifty years after purchase by the National Park Service. Public Law 87-657(6); *Managing a Land in Motion: An Administrative History of the Point Reyes National Seashore* (Sadin, Historical Research Associates 2007) at 93. 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. Sadin at 177.

During the 1970s, after Congress increased the funding for acquisition of the parklands, most or all of the ranchers agreed to sell and the NPS granted reservations of use and occupancy or life estates to landholders who wanted to continue ranching. Sadin at 140-141,177.

In 1978, Congress again amended the enabling legislation both to shorten the term of years a ranch could remain after purchase and to authorize the leasing of agricultural lands: The legislation states: When appropriate in the discretion of the Secretary, he or she may lease federally owned land (or any interest therein) which has been acquired by the Secretary under sections 459 to 459-7 of this title and which was agricultural land prior to its acquisition. Such lease shall be subject to such restrictive covenants as may be necessary to carry out the purposes of 459c to 459-7& [emphasis added]. See discussion above.

The import of the latter action was that although the Secretary was now authorized to lease agricultural lands, he or she was required to exercise such authority in a way that would not impair the natural values of the land and would be supportive of the maximum protection, restoration, and preservation of the natural environment within the area,& 16 USC Sec. 459c (6)(a). Accordingly, ranching must be carried out in a way that supports rather than undermines natural resource protection.

When the earlier reservations of use began to expire in the 1990s, then-Superintendent John Sansing began to issue 5-year renewable leases with the understanding that such leases would be renewed indefinitely. Sadin at 177-78. Between 1990 and 2001, 21 ranch operators entered into such leases.

Recent pronouncements from the federal government have not changed the essential priorities for management of the Park or the pastoral zone. The 2012 order of then-Secretary of Interior Ken Salazar mandated the Seashore to pursue 20 year lease arrangements, but again, in a way that is consistent with applicable laws and planning processes. This latter phrase clearly refers back to the purposes of the Seashore as summarized above.

A July, 2019 Draft Foundation Document again restates the Seashores essential purposes: Established for public benefit and inspiration, the Point Reyes National Seashore protects a rugged and wild coastal peninsula and surrounding waters, connecting native ecosystems, enduring human history and recreations, scientific and educational opportunities. The document lists the fundamental resources and values of the Park as consisting of wilderness, coastal landscapes, marine, estuarine and freshwater environments, diverse habitats and native species, maritime cultural landscapes, continuum of human use (including ranching), opportunities for inspiration and recreation and science and learning. Here again, while ranching is acknowledged as a resource, it appears to play a subordinate role in relation to the conservation of natural, historic and archeological resources. Indeed, it is lumped together with the history of indigenous peoples under the rubric of Human Use. Foundation Document at 6. Furthermore, ranching is not even mentioned in the list of interpretative themes. Id. at 7. Accordingly, nothing in the Foundation Document accords ranching priority over natural resource conservation, particularly dairy ranching.

While the DEIS also cites a Joint Explanatory Statement that accompanied a February, 2019 omnibus spending bill (ending the government shutdown), this provision has no binding legal effect. See DEIS at 3. While the statement showed support for the continuation of ranching and dairying in the Seashore, the topic was nowhere addressed by the bill itself. Without a corresponding provision in the text of a bill approved by both chambers of Congress, a declaration in a joint explanatory statement or committee report has no force. *Puerto Rico Dept. of Consumer Affairs v. Isla Petroleum Corp.*, 485 U.S. 495, 501 (1988)(Unenacted approvals, beliefs and desires are not laws); *Secretary of the Interior vs. California*, 464 U.S. 312, 323 n.9 (1984).

Taken as a whole, the legislative history of PRNS requires management of the ranchlands in a way that advances the protection of its key resources and values. Indeed, the DEIS itself states that the purpose of maintaining agriculture in the Park is to preserve cultural history and structures. DEIS at 2. Decisions about the future of ranching should implement this vision, not fundamentally enlarge the role of ranching so as to promote alternative concepts such as sustainable agriculture, diversification or multi-generational ranching. Simply put, ranching in the Seashore is a means of preserving the cultural history of the area and managing its grasslands.

#### B. CNPS Opposes Preferred Alternative B and Supports Alternative E, Modified as Described Below

CNPS rejects Alternative B because it would (a) represent an unwarranted expansion of agricultural activities in the Seashore, (b) perpetuate practices that are counter-productive for natural resource stewardship and water quality, (c) fail to advance the preservation of cultural history and structures in an appropriate manner, and (d) miss a critical opportunity to improve native plant communities, water and air quality and habitat for rare plants and wildlife. Alternative E, in contrast, would maintain a level of grazing that is generally beneficial to native vegetation while dispersing the adverse impacts of cattle, such as congregations around barns and feeding areas, leading to manure accumulation, erosion and runoff.

Furthermore, of the alternatives presented, Alternative E would best achieve the desired conditions as outlined in the DEIS-that is, it would improve ecological function, connectivity and natural processes, reduce air and water pollution, protect threatened and endangered species, reduce invasive species, and preserve landscapes and structures in a manner that maintains their integrity. DEIS at 2-3.

1. Native vegetation and the benefits of grazing. Of the listed desired conditions, CNPS is naturally most concerned with native plants and vegetation. We support Alternative E because the elimination of dairying would address many of the serious impacts noted in the DEIS; see discussion below; while the continuation of beef ranching would preserve the natural process of grazing, which, on balance, is more beneficial to native vegetation than the lack thereof. As pointed out in the DEIS, cessation of grazing & may [] result in an increase in invasive annual and perennial species such as thistles and grasses; a likely decrease in native forb species abundance and richness; shrub encroachment into areas currently characterized as coastal prairie; and an increase in vegetative fuels. DEIS at vi.

The beneficial impact of grazing on native vegetation likely stems from the fact that California grasslands and prairies evolved under a regime of grazing by Pleistocene-era megafauna - mastodon, mammoth, camel, llama, bison, elk, pronghorn and horses. These herbivores grazed on grasses and forbs as well as trees and shrubs. *Grazing Handbook*, Sotoyome Resource Conservation District (2006). See <http://www.carangeland.org/images/GrazingHandbook.pdf> at 2. Thus a grazing regime is an essential ecological process that should be preserved at Point Reyes.

The presence of elk in the Seashore today is not only a positive reminder of our evolutionary past, it also has environmental benefits. A study from Arizona reported that while elk and cattle have similar diets, the stubble height in elk-foraged fields was about 2 centimeters higher than stubble left by cows, with positive ramifications for soil moisture retention, erosion, plant regrowth and wildlife habitat. Halstead, L.E. et al., *Elk and Cattle Foraging Under a Specialized Grazing System*, *J. Range Management* 55:360 (July 2002). Furthermore, being larger and heavier, cattle consume more forage than elk: a single adult dry cow consumes almost half again as much forage (727 lbs. per month) as one mature elk (474 lbs. per month). *Grazing Handbook* at 9. See also



<https://baynature.org/article/con-cattle-grazing-is-incompatible-with-conservation>. CNPS is thus content to see the elk herds enlarge in the pastoral zone although, in the absence of predators, it will likely be necessary to control their numbers eventually.

Still, the matter of grazing and native plant conservation is enormously complex and site-dependent. Some studies show that grazing is likely to benefit native annual forbs by reducing the height and biomass of competing grasses and non-native forbs and opening up micro-sites. DEIS at 144. On the other hand, native perennial forbs appear to be harmed by grazing, because the latter clips the plants reproductive structures, thereby preventing them from setting flowers and seeds. DEIS at 145. With respect to grasses, one study of grazing impacts on the California coastal prairie plant community showed that cattle grazing promoted exotic annual grasses and forbs, such as *Erodium*, and did not benefit native plants; cover and species richness of native perennial forbs, grasses, sedges and rushes were all higher in ungrazed sites. G.F. Hayes & K.D. Holl, *Cattle Grazing Impacts on Annual Forbs and Vegetation Composition of Mesic Grasslands in California*, 17 *Conservation Biology* 1694-1702 (2003). Similarly, a 2003 study conducted at Carrizo Plain concluded that cattle-grazing is counter-productive for native plant restoration, that it harms native species and promotes alien plant growth. *Differing Effects of Cattle Grazing on Native and Alien Plants*, *Conservation Biology*, Vol . 17, Issue 6.

A research project carried out at Pepperwood Preserve in Sonoma County reported that some but not all perennial native grasses benefitted in the absence of grazing, that exotic clovers and *Erodium* species increased under a grazing regime, and that although grazing is detrimental to native perennial forbs, it benefits native annuals. See also H.W. Elliott and J.E. Wehausen, *Vegetational Succession on Coastal Rangeland of Point Reyes Peninsula*, 22 *Madrono* No. 5 (1974)(after 6-year trial, more native plant species found on ungrazed plot compared to lightly or moderately grazed plots). While these studies suggest that grazing should be greatly reduced in the planning area, researchers have also identified environmental benefits when grazing is managed carefully. Grazing can prevent the invasion of shrubs into grasslands, thereby reducing fire hazard and preserving prairie or grassland habitat. By preventing the buildup of dense thatch on the ground, grazing can promote germination of many native wildflowers, including popcornflower (*Plagiobothrys* spp.), clovers (*Trifolium* spp.), owls-clovers (*Castilleja* spp.), cream cups (*Platystemon californicus*) and red maids (*Calandrinia ciliata*). *Grazing Handbook* at 4. Just as trampling is sometimes harmful, it can also improve the soil by breaking up dead grass and mixing it into the soil, along with nutrients such as manure and urine. *Grazing Handbook* at 8. Grazing can also be an effective weed management technique, especially when used for short periods using portable electric fencing. *Grazing Handbook* at 16.

Public lands managers striving for an appropriate balance between agriculture and conservation limit the number of cattle or elk, and/or modify the intensity, seasonality, duration and frequency of grazing on any particular site, depending on the specific resources to be encouraged. *Grazing Handbook* at 8. For example, a 3-year study of a planned grazing program at TomKat Ranch in San Mateo County found that by increasing cattle density, moving the herd through a series of smaller subdivided pastures, and giving each pasture a respite from grazing for 70 to 120 days led to a 72% increase in native perennial grasses. C. Henneman, N. Seavy & T. Gardali, *Restoring Native Perennial Grasses by Changing Grazing Practices in Central Coastal California*, 32:4 *Ecological Restoration* at 352 (Dec. 2014).

Additionally, grazing of varying intensity can be used to create habitat heterogeneity. Some native rodents and small mammals can benefit from more intense grazing whereas California meadow mouse and western meadowlark prefer lighter regimes. Grazing has been found to improve conditions for both dog violet (*Viola adunca*), thereby supporting the endangered Myrtles silverspot butterfly, and dwarf plantain (*Plantago erecta*), an important plant food for the Bay checkerspot. *Grazing Handbook* at 15, 18.

CNPS supports the concept of Resource Protection Zones (RPZs) as a means to regulate grazing for the purpose of enhancing rare plant populations. For example, RPZs on F and G Ranches will be established to exclude cows from dunes and other sites either year-round or seasonally, thereby improving conditions for beach layia (*Layia carnosa*), Tidestroms lupine (*Lupinus tidestromii*), Sonoma alepecurus (*Alepecurus aequalis* var. *Sonomensis*), San Francisco spineflower (*Chorizanthe cuspidata* var. *cuspidata*) and Sonoma spineflower (*Chorizanthe valida*).

Appendix K at 67, 69, 71. The Seashore can also implement prescribed grazing programs in the RPZs to coordinate grazing with the phenology of both rare plants and invasive weeds in coastal prairie and other plant communities. UCBGP at 11, 30.

Indeed, CNPS would like to see such nuanced grazing plans created for all the rangelands in the Seashore, not just in the small RPZs. We urge the Seashore to provide more detail on the ranch-by-ranch management of rare plants and plant communities in the Final EIS-tailored grazing plans that adjust the intensity and timing of grazing to suit the vegetative resources that exist on any given ranch. Such practices can and should also be incorporated into the Ranch Operating Agreements and we urge NPS planners to do so, whatever alternative is ultimately adopted.

2. Adverse impacts of dairying. As a general matter, the DEIS supports our view that Alternative E is superior to Alternative B: Under alternative E, noticeable beneficial impacts would occur compared to existing conditions from the conversion of the six dairy ranches to beef operations, elimination of manure management practices, seeding, forage production, and diversification activities. DEIS at vi. Specifically regarding vegetation, the DEIS states that the impact of dairy on vegetation is more adverse and severe than that of beef cattle. DEIS at 143.

A major reason for such adverse impact is the practice of planting and harvesting silage, hay and haylage. These activities disturb the soil, consume water and displace coastal prairie, in areas where coastal prairie historically existed, or other native plant habitat. See *Grazing Plan for the Point Reyes Seashore Managed Grazed Lands*, L. Aoyama, L. Waks, P. Hopkinson<sup>1</sup>, and J. Bartolome, Range Ecology Laboratory, Department of Environmental Science, Policy, and Management, University of California, Berkeley (2018)[UCBGP] at 54. Other impacts include seepage from silos and wildlife disturbance, particularly on grassland birds. Id.

Dairies also concentrate the impacts of cattle grazing, trampling and manure accumulation in small areas near the milking facilities and feeding areas, creating areas of unvegetated ground and leading to erosion and sedimentation of streams and estuaries. The DEIS itself recognizes that [d]airies are high intensity operations that require extensive milking, feeding, and waste management infrastructure to meet current production and water quality management standards. A typical dairy includes milking, loafing, and feed barns; structures for milk storage and processing; and often a hospital barn. DEIS at 10. Appendix K at 7-8.

Moreover, [o]rganic production standards require dairy cattle to remain on pasture for a minimum of 120 days per year, and animals older than 6 months of age must get at least 30% of their dry matter intake from pasture during the grazing season (US Census of Agriculture 2013). DEIS at 10; UCBGP at 50. This reduces managers flexibility to adjust grazing pressure to protect native vegetation and rare plants.

Dairying practices have also changed significantly since the mid-20th (let alone the mid-19th) centuries, in ways that reduce its compatibility with the goal of cultural or historical preservation. Specifically, herd size has almost doubled statewide since 1982. UCBGP at 41. Breeding has made milk cows more productive which in turn increases their nutritional needs and necessitates supplemental feed. Id at 41. Modern dairy cows require more range than other classes of livestock, whereas beef cattles protein needs are low, normally allowing them to get by on natural pasture. Id.

As noted above, dairies require greater investment in buildings and fences than cattle operations: milking parlor, loafing barn, waiting and feeding areas have become standard. While these modern features of dairying may make Point Reyes dairies more competitive in the larger market, they do not advance the preservation of 19th and early 20th Century cultural or historical heritage at Point Reyes and should not be reflexively approved.

In addition to facilitating better vegetation management in the Pastoral Zone, Alternative E better supports other desired conditions enumerated in the DEIS than Alternative B.

3. Soils. Movement patterns of dairy cows are concentrated in areas near milking and feeding leading to soil compaction and erosion. DEIS at vi. In contrast, except for water troughs, beef cattle are dispersed over large areas, causing little or no compaction, erosion and sedimentation. Id at 65. Moreover, compared to beef cattle

operations, dairies produce large quantities of concentrated manure waste, resulting in the need to spread manure and slurry over fields, with more compaction of soil by heavy trucks and other equipment; these practices would be eliminated under Alternative E.

4. Water Quality and Quantity. The DEIS also notes that Alternative E would improve water quality in streams and wetlands compared to Alternative B. Because dairies produce large quantities of concentrated manure waste; DEIS at 10; liquid manure must be sprayed or spread on pastures through a pump and irrigation system. Large trucks also spread slurry and solids by driving over pasture lands and distributing manure. Id at 11. See App K at 7-8. These practices increase nutrient-laden surface runoff and pollution of streams and wetlands. The removal of dairy operations under alternative E would thus eliminate adverse impacts on surface water quality associated with livestock congregation and concentrated manure storage near milking barns and would eliminate potential impacts from spreading manure in the Pasture subzone. Id. at vi.

Modern dairies also tend to over-supply cows with protein, which ends up being excreted as N (nitrogen). Leached to surroundings, waterborne N leads to eutrophication and changes in the composition of plant communities to favor nitrophilous graminoids. UCBGP at 43.

While the DEIS states that dairy cattle consume between 15 to 25 gallons of water per day; DEIS at 10; UCBGP at 42; this underestimates the water needs of dairy cows. According to a dairy industry publication, a milking dairy cow consumes between 30 and 50 gallons of water per day; <https://www.dairyherd.com/article/drinking-water-dairy-cattle-part-1>; compared to only 12-20 gallons per day for beef cattle. DEIS at 10; UCBGP at 42. See also <https://beef.unl.edu/amountwatercowsdrink> (beef cattle consume from 3 to 30 gallons per day depending on age, weight, stage of production, and the environment (mainly air temperature). Dairy operations have additional water needs for the management of the dairy complex, cleaning, and other tasks&. DEIS at 10.

Thus, elimination of the dairies would increase the supply of ground and surface waters in addition to reducing polluted runoff.

5. Air quality. Dairies produce more greenhouse gases, including methane and nitrous oxide, from manure and indirectly from fertilizer production, clearing of pastures, energy use associated with tractors, milking equipment, transport of hay and dairy products to and from the marketplace. UCBGP at 42. Elimination of dairies would thus improve the Seashores carbon footprint as well as local air quality.

#### 6. Preservation of Cultural Resources & Public Use and Enjoyment

Under Alternatives A, B, C and D, visitors to the Seashore would continue to bump and jostle along a seriously eroded and rutted Sir Francis Drake Boulevard. With the ranchers exempt from property taxes, the County must bear all the costs of repair. On the other hand, if dairies were phased out under Alternative E, it would end most trips currently made by heavy milk and hay trucks, thereby greatly reducing the wear and tear on the road and reducing public expense.

The end of dairying in the Seashore would also continue an historic trend of converting dairies to beef ranches that began before the Park was created. UCBGP at 1. Indeed, it is unnecessary to allow the adverse impacts of dairying to continue merely to preserve cultural history at Point Reyes. In the Bay Area alone, there are several examples of NPS preserving the historic and cultural resource of a park unit without the underlying activities continuing: the jailers and inmates are long gone from Alcatraz; no ammunition is loaded onto ships at Port Chicago; no Nike Missiles defend the Marin Headlands against Soviet bombers.

Similarly, the recent designation of the Seashores pastoral zone as a rural historic district does not require that actual dairying or beef ranching continue, according to a spokesman for the National Register of Historic Places. <https://www.ptreyeslight.com/article/park-service-recognizes-olema-and-point-reyes-dairy-ranches>. Indeed, another designation recognizing the Olema Valley Dairy Ranches Historic District was made despite the fact that

no dairies currently exist there. Appendix A at 3. It is thus not essential to maintain dairying for reasons of historic preservation.

It is also highly questionable that cultural resources and public use and enjoyment of the park would be advanced by the proposed diversification of ranch activities allowed in Alternative B. Goats, sheep, chickens and pigs-along with their attendant guard dogs, llamas and donkeys- - would clutter the pastoral scenery and confuse the messaging about past ranching at Point Reyes. Appendix K at 15-16. Likewise, the suggestion by one rancher to grow quinoa lacks any historic precedent. Scoping letters Received at 595.

Moreover, pigs and swine have a history of escaping into the wildlands of California with serious adverse consequences for native plants, habitats and water quality.

Ranch tours, home stays, processing facilities and farm stands would commercialize the pastoral zone for private gain and have no place in a national park.

Currently, park visitors are exposed to large areas of bare soil trampled by dairy cattle, mounds of manure and vast patches of radish, velvet grass and other weeds-not to mention derelict buildings and junk cars. These unsightly scenes detract from both the pastoral ambience and public enjoyment of the Seashore and do not comport with public expectations for a national park.

CNPS thus urges the Seashore, as part of this GMPA process, to closely scrutinize whether modern dairies, with their increased infrastructure, larger herds, higher nutritional needs, pasturing requirements, tendency to introduce and spread invasive plants and now diversified products would truly serve the purpose of preserving cultural history in a manner that maintains their integrity. DEIS at 2-3. In contrast, a landscape of widely-dispersed grazing beef cattle and elk would maintain the historic and prehistoric landscape while having significantly less severe adverse environmental impacts.

7. Socioeconomic impact. The DEIS states that under Alternatives A-E, agriculture in the Seashore would continue to contribute to the economies of Marin and Sonoma counties, through employment, taxes and spending by the ranchers and their employees. Nonetheless, Under alternative E, conversion from dairy to beef operations would result in the loss of \$14.4 million in annual revenue and 27 jobs at ranches in the planning area. DEIS at ix. Some of the job losses might be offset by vegetation management projects to be undertaken by NPS, such as weed management and habitat restoration. The DEIS goes on to conclude that When the incremental impacts of alternative E are combined with the impacts from past, present, and reasonably foreseeable actions, the overall cumulative socioeconomic impacts would remain beneficial.

## B. Ways to improve Alternative E and the GMPA

CNPS offers the following points to improve the ultimate GMPA.

1. Efforts to increase grassland. The DEIS calls for mowing and grazing to prevent coyote brush and other shrubs from invading grasslands. DEIS at 22. While we agree that diversity of plant communities is desirable, we question the need for these measures and urge the NPS to adopt an adaptive management approach. The conditions in the elk refuge on Pierce Point show that grasslands persist after several decades of native deer and elk grazing without cattle. Moreover, the elk are known to break off branches and otherwise limit coyote brush such that the stands are not as thick as on ungrazed areas.

An adaptive management approach should recognize the positive ecological role of coastal scrub brush in providing wildlife cover, enhancing overall biodiversity and a more natural vegetative cover. Mowing of brush in pasture and range subzones should thus be limited to areas previously occupied by native grassland, as shown by historical photographs prior to early 1970s and to soil types appropriate to support grassland, according to the USDA, NRCS, soil survey and associated ecological site descriptions. Table D-11 to D-37. Any mowing should be timed to avoid disrupting native plant reproduction and nesting birds.

2. Residual Dry Matter. The DEIS cites a 2015 UC Berkeley study as approving an RDM minimum of 1200 pounds per acre. DEIS at 11. However, the 2019 grazing plan calls for a range from 1200 to 2100 pounds per acre depending on soil type and slope to protect coastal prairie. UCBGP Table 6. Accordingly, the RDM limits should be tailored to the underlying plant communities and the subzones on each ranch. Higher levels should be required for coastal prairie, wetlands, the rangeland subzones and steep slopes whereas lower amounts are acceptable for non-native grassland and pasture and core subzones. UCBGP at 44.

3. Invasive plants. The FEIS should provide more detail on plans for managing invasive plants. It should specify projects and methods for dealing with the various invasive species and state how prescribed burning might be used in the program. Each Ranch Operating Agreement should set forth the ranchers specific responsibilities for weed management.

4. Soil Erosion. Heavily trafficked corridors with deeply incised paths and all eroded sites frequented by cattle should be fenced from their use as already practiced in some areas. Alternative routes to pastures and ranch core sub-zones should developed to disperse cattle as much as possible to forestall new soil erosion.

5. Restoration. A more systematic and deliberate effort should be made to restore native plant habitats and re-establish native plants and communities.

6. Dairying history. if deemed necessary, a small demonstration dairy might be established at one of the former dairies to represent this aspect of the areas agricultural history.

D. Deficiencies of the DEIS The following points should be corrected in the Final EIS:

1. The DEIS fails to provide a rationale for the choice of Alternative B as the preferred alternative. The FEIS should rectify this and analyze how each alternative would or would not achieve the desired conditions.

2. The FEIS should forthrightly identify the impacts associated with the various Alternatives and characterize each impact as significant, moderately severe or not significant. It is inadequate to simply declare in conclusory fashion that all impacts are not significant except where noted. DEIS at 99. Such findings need analysis and support.

3. Since no public project-level review will take place for vegetation management actions on the ranches; DEIS at 6; the FEIS must state what resources are at risk each ranch and specify what mitigation measures are to be required in each Ranch Operating Agreement. Such plans should include the timing and extent of grazing to be permitted in which sub-zones and what sensitive plant species will be affected. Table D-1 at D4-D5.

4. Alternatives A through E fail to include restoration plans for coastal prairie, wetlands and riparian and dune areas to benefit native plants, fish, invertebrates and wildlife as discussed under Alternative F. DEIS at 160-161. All Alternatives should include these plans. Coastal prairie and dune habitats at Point Reyes are of statewide conservation value and need stewardship and restoration. UCBGP at 4, 13.

5. The DEIS fails to address plans for active restoration of suitable habitat for rare plants other than the federally endangered species. Approximately 50 such special status plant species are listed in Appendix J, Table J-1 and J-2 and the UC Berkeley Grazing Plan. UCBGP at Table 4, page 21. The habitats for these plants include bluffs and headlands, coastal prairie, dunes and sandy flats, freshwater marsh or seasonal wetlands, salt marshes or brackish lagoon shores.

Additional rare or special status species that were omitted from the DEIS and the Berkeley Grazing Plan are listed below. These plants should also be included in habitat restoration plans.

Nuttalls milkvetch, *Astragalus nuttalli* var. *nuttalli* (CRPR 4.2) Field chickweed, *Cerastium viride* Coastal gumplant, *Grindelia hirsutula* var. *maritima* (CRPR 3.2) Hayfield tarweed, *Hemizonia congesta* ssp *congesta* (CRPR 1.B2) Pt. Reyes horkelia, *Horkelia marinense* (CRPR 1.B2) Harlequin lotus, *Hosackia gracilis* (CRPR 4.2)

Robust spineflower, *Chorizanthe cuspidata* Pedunculate forma robusta (federally endangered) Franciscan wallflower, *Erysimum franciscanum* (CRPR 4.2) Lyngbyes sedge, *Carex lyngbyei* (CRPR 2.B2) Round woolly marbles, *Psilocarpus chilensis* Humboldt Bay owls clover, *Castilleja ambigua* ssp *humboldtiensis* Marin knotweed, *Polygonum marinense* (CRPR 3.1) California bottle brush grass, *Elymus californicus* (CRPR 4.3) Nodding semaphore grass, *Pleuropogon refractus* (CRPR 4.2)

6. The DEIS failed to adequately address the scoping comments made by CNPS.

o The DEIS failed to include mapping of special status plant populations or coastal prairie (as distinguished from non-native grasslands). The US Fish and Wildlife Service advised the NPS to include this information in the Appendices but this was not done. Appendix K at 3.

o The DEIS fails to provide adequate detail on the RPZs: what resource(s) is to be protected by each and how?

E. Conclusion CNPS urges the Seashore planners to adopt Alternative E as the most effective option for achieving the desired conditions related to vegetation, soils, water and air quality, cultural preservation, public use and enjoyment and socioeconomics. Still, Alternative E would be improved by incorporating more protective approaches to mowing, RDM, invasive plants, and habitat restoration.

Finally, the FEIS should provide a rationale for the preferred alternative, characterize the severity of impacts, provide adequate detail regarding grazing plans on each ranch, include mapping and restoration plans for coastal prairie and other important plant communities within the pastoral zone and all special status plant populations, and identify the resources to be protected by each RPZ.

Thank you for the opportunity to comment. Carolyn Longstreth, Director, Marin CNPS, on behalf of the Board of Directors

#6457

Name: Russell, Shelley

Correspondence: All the ranching alternatives in the Draft Environmental Impact Statement involve the impairment of natural resources. Three National Park Service laws prohibit actions that will impair natural resources (the 1916 NPS Organic Act, Point Reyes National Seashore legislation Section 459c-6, and Golden Gate National Recreation Area legislation Section 460bb). Consequently, the Park Service should prepare a supplemental DEIS with ranching alternatives that comply with applicable laws requiring the protection of natural resources. The Park Service should then circulate that supplemental DEIS for public comment. No ranching should be allowed on National Park Service land!

#6458

Name: Stocker, Elizabeth

Correspondence: Our public lands were intended for all of us. Allowing ranchers to run their cattle on the public lands diminishes the land with no benefit to the rest of us. Please do not allow ANY expansion of this activity and find a solution to the original acceptance by prohibiting this in the future.

#6459

Name: Helgeson, Eric

Correspondence: The Agricultural lease and succession planning requirements should be revised to transition to reduced dairy farming at Point Reyes, in keeping with the original goals of the establishment of the National Seashore. There are significant stream and beach water quality issues generated by the dairy farm manure handling and spraying. The tule elk and other wild animals populations are negatively impacted by the farms, fencing and habitat degradation caused by dairy farming at Point Reyes.

#6460

Name: Barnes, Burton

Correspondence: I am a rancher raising cattle for beef in Sonoma County and for over 35 years doing so I know well the environmental resistance against us by persons well organized and having arm chair images of the way life should be lived on a ranch. I firmly believe the NPS should continue to follow previous plans and established practices in the planning area. Additionally, NPS should continue to apply the management zoning framework outlined in the 1980 GMP.

Continued resistance by those acting in the name of environmental matters without ever having to deal with the issues they want to pursue will eventually cause the cessation of agricultural operations to exist. That is their goal, however well-intention it may appear!

#6461

Name: N/A, Laurent

Correspondence: I am writing to urge the National Park Service to discontinue the grazing of beef and dairy cattle at Point Reyes National Seashore. This precious area has been damaged by livestock grazing which poses a threat to the environment and local wildlife and it should be protected and used to serve the public good, and not for the benefit of the livestock industry.

I strongly oppose Option B and any other proposal that would be fatal to Tule Elk or other wildlife to the benefit of ranching operations, and encourage the agency to adopt Option F to discontinue grazing and allow members of the public to enjoy this beautiful park and to be enriched with opportunities to visit and appreciate this special place.

#6462

Name: Nickum, Annaloy

Correspondence: I'm appalled that you would sacrifice the lives of the indigenous Elk on public lands for the lives of non native cows. These cows not only contribute to climate change, they destroy complex botanical systems. The last time I was there, I saw herds of cattle trampling vast complexes of native plants. The areas outside the fences that contained the cattle were a rich mixed carpet of native plants that feed multitudes of insects and birds that are a vital part of the earth's immune system. The public good and the protection of vital ecosystems should always be above private profit. These cattle will be slaughtered anyway.

#6463

Name: Muhanoff, Alex and Diana

Correspondence: We believe option F is the closest to an appropriate vision of the future park usage.

#6464

Name: Stanford, Joan

Correspondence: We urge the NPS to end livestock grazing at Point Reyes National Park and to allow this precious land to remain as wildlife habitat and to be used for the public good, not for the benefit of the livestock industry.

#6465

Name: Seltzer, James

Correspondence: The highest measure of service to God's will occurs when people advocate for creatures that cannot advocate for themselves.

#6466

Name: Howell, Judd

Correspondence: COMMENTS REGARDING AGRICULTURAL AND WILDLIFE MANAGEMENT AT POINT REYES NATIONAL SEASHORE AND GOLDEN GATE NATIONAL RECREATION AREA

Judd A. Howell, B.S., M.S., Ph.D. (USGS, GS-15, Retired) Certified Wildlife Biologist

September 18, 2019

I have watched the Park Service's management of ranching on the park lands of Point Reyes National Seashore and the Golden Gate National Recreation Area for the past 39 years. I came to Golden Gate National Recreation Area in 1980 as that park's first Park Ranger GS-025 (Natural Resources Specialist) and wrote the park's first Natural Resources Management Plan, which was completed and approved in 1982. During my 20 year tenure, I became Golden Gate's Ecologist then Research Scientist. In the mid-to late 1990's my team and I conducted elk population, habitat and food habit studies of elk at Pierce Point. This work became part of the 1998 Tule Elk Management Plan for Point Reyes which resulted in a decision to relocate some of the Pierce Point elk to the Limantour area. Some of those elk traveled to the Drakes Beach area and their descendants have become what is now known as the Drakes Beach elk herd. That herd is comprised of 124 elk.

John Sansing was the Superintendent of Point Reyes National Seashore from 1970 to 1994. He showed little interest in natural resource conservation, and his decisions at the time seemed to me, to favor the ranching community. The ranching and dairying influence have persisted over the fundamental precepts of the National Park Service to protect and conserve the natural resources for public use and enjoyment for future generations. These precepts have been the backbone of National Park management. As I recall, Superintendent Neubacher worked diligently to support the natural resource values of Point Reyes, only to become crosswise with the local agricultural community. He was then "kicked upstairs" to Yosemite because he was trying to support National Park Service conservation policy and values.

I grew up on a small ranch in Montana. My stepdad raised cattle and had been a Brand Inspector for the State of Montana. We understood the marginal nature of beef production. Therefore, it was clear to me, even back in the mid-1980's and 1990's, that ultimately dairy and beef production would not be economically viable at Point Reyes and Golden Gate. Today we see that this reduced economic viability has come to pass. The proposal to broaden the "traditional" agricultural practices of beef and dairy ranching to a proposed "diversification" in Alternative B, is really a response to the economic pressures that face the few ranches and dairies in that part of West Marin. Some of the dairies in the Seashore have significantly cut their dairy cow numbers, likely as a result. Hence, the ranchers want to expand permitted livestock beyond cattle in the area of the ranch cores to include sheep, goats and chickens in the pastures (500 chickens per ranch, no less) and pigs and row crops. All of which would likely increase erosion in the Park. The Park Service has a statutory mandate to manage park lands in an "unimpaired" condition and with "maximum protection, restoration, and preservation of the natural environment." Given the legal mandate and the damage that has occurred, ranching should end. Unfortunately, that statutory mandate has not been embraced by upper National Park Service leadership or the current Superintendent, who I suspect faces intense pressure from the ranching industry and their political supporters Senator Feinstein and Congressman Huffman. That is a tough spot for anyone.

National Parks were created for natural resource conservation and to be learning centers. Perhaps, maintaining a small demonstration dairy operation at Point Reyes would be of value for the public as interpretive sites about historic preservation and land use practices. Tule elk occupied the Point Reyes area in the thousands, yet the current 124 elk in the Drakes Beach herd are causing the local ranching community "serious" problems. Currently, there are 5,715 cattle (beef and dairy) units per year, yet 124 elk cannot be tolerated. The notion that elk are a "problem" is obviously misguided, since elk coexist with cattle on BLM and Forest Service grazing lands throughout the western U.S. My recommendation is Alternative F: 1. Dairying and ranching, except for a small



dairy interpretive site perhaps more detail at Pierce Point, should be ended within the next 5 years. 2. The 8-foot fence at Pierce Point should be removed.

Sincerely,

Judd A. Howell, Ph.D.

#6467

Name: Bauer, Jennifer

Correspondence: The EIS makes it clear that under all the alternatives for continued cattle ranching, there will be detrimental environmental consequences on the Park's natural resources, including soils, water quality, vegetation, and wildlife, including tule elk.

Consequently, the Park Service should not adopt any ranching alternative and prepare a supplemental DEIS with ranching alternatives that comply with applicable laws prohibiting the impairment of natural resources.

#6468

Name: N/A, N/A

Correspondence: I support Alternative F, which prioritizes native species, which are important for the maintenance of biodiversity. The area has already been altered dramatically over the last 150 years at the expense of indigenous species of flora and fauna. I am against Alternative B.

Please take this into serious consideration.

#6469

Name: Brittain, Robert

Correspondence: Our family has been visiting Pt. Reyes area since we arrived in California in late 1979. We particularly love the north end where we can hike to the see native tule elk reserve there. While I appreciate the stewardship of the National Park Service of Pt. Reyes National Seashore, I question the environmental contribution of cattle ranches to the natural environment these. Whereas it is true that the ranches are historical in a short-term way (mid-19th century?), in the longer term they were not. The tule elk preserves, however, deal with a much larger challenge. Although the native range of the tule elk has been virtually destroyed by development of agriculture and urbanization, the tiny reserves created for their preservation do not have adequate resources to support their re-establishment and preservation. I remember reading about the terrible losses to the Pt. Reyes herd due to loss of water resources and calcium deficiency during the last few years. Expanding their range on current ranch lands would definitely provide more water resources and calcium deficiencies could be handles with placements of bone resources from harvested cattle on the remaining ranches.

#6470

Name: Schallenberger, Lisa

Correspondence: When GGNRA was first conceived of, it was never the intent to marginalize the farms or the rangers would not have bought into the idea of the GGNRA in the first plan. You have already removed the Oyster farms and now you are trying to restrict and remove the diary farms. I was closely involved in the behind the scenes in many of the early conversations as Dr Edgar Wayburn was my father best friend. I know what the original intent was and to hear what the NPS has done to disregard all of that is deplorable. The intent was to stop Marincello and other large development and to keep the idyllic farms and open space. These farmers now can not

even improve their homes and can not get loans because of the NPS. GGNRA should never have been give to NPS to manage.

#6471

Name: Milholland, Laura

Correspondence: Dear Sirs/Madams, In looking into this matter, all the ranching alternatives in the Draft Environmental Impact Statement involve the impairment of natural resources.

Three National Park Service laws prohibit actions that will impair natural resources (the 1916 NPS Organic Act, Point Reyes National Seashore legislation Section 459c-6, and Golden Gate National Recreation Area legislation Section 460bb).

It is my strong opinion that the Park Service should prepare a supplemental DEIS with ranching alternatives that comply with applicable laws requiring the protection of natural resources. And the Park Service should then circulate that supplemental DEIS for public comment.

Thank you for your consideration of my comments.

#6472

Name: Walton, Kathleen

Correspondence: The Point Reyes Seashore and surrounding area is a national treasure. Not only is it spectacular as a visit for tourists, it is spectacular for locals who visit regularly. If we have the opportunity to protect it's pristine nature while also preserving a lifestyle that is diminishing by the minute to a few families who respect what they have, why wouldn't we do so? There is so much parkland and open spaces being turned over to development of various kinds under this current administration, we have to stop it if we can and seems we can here.

#6473

Name: Capron, Jean

Correspondence: As a Marin Country resident (since 1992) I treasure the open space we have, for recreational use as well as for ranching and farming. I love seeing the elk, the elephant seals, and knowing that we live in a place where there the creeks are protected for salmon spawning, and where there is an abundance of other wildlife, and wild flowers. I think it is very, very important that safeguards to protect the creeks be kept, monitored, updated, maintained, and enforced - - in residential neighborhoods as well as on and around the ranches and farms - - and include our gorgeous beaches as well. I support very strongly the historical ranches and dairies and farms that we have. I fear that, if the ranches were phased out and all the open space was then turned over to the NPS, that loss would affect the local economy (I buy local as much as possible), including jobs, and, inevitably, bit by bit, the NPS would be forced to start selling the open space for development - - housing developments, mini-malls, etc. I feel we have a TREASURE right here in Marin County and finding the right balance is the best solution, in my opinion. I have read the several proposed plans and Plan B coincides the closest with my belief of what is right for our wonderful county.

#6474

Name: Haskell, David

Correspondence: I support Option F - phase out all farming in Pt Reyes National Seashore.

Under the original terms of the National Seashore - the resident ranchers were all paid out and given a set time to transition out. I believe that original agreement should be honored. I have sympathy for the families who now reside in the park, however preservation of wild lands is a higher priority for the land now. Let the Elks run free. Remove the fences. Get the cows off the beaches and riparian strips.

Thank you for this opportunity David Haskell

#6475

Name: Wilkerson, Gillian

Correspondence: All the ranching alternatives in the Draft Environmental Impact Statement involve the impairment of natural resources.

Three National Park Service laws prohibit actions that will impair natural resources (the 1916 NPS Organic Act, Point Reyes National Seashore legislation Section 459c-6, and Golden Gate National Recreation Area legislation Section 460bb).

Consequently, the Park Service should prepare a supplemental DEIS with ranching alternatives that comply with applicable laws requiring the protection of natural resources.

#6476

Name: Ryan, Natalie

Correspondence: Please don't agree to the plan referred to as 'Alternative B,' which would allow the Limantour herd, which numbered 174 animals in 2018, to be "managed in consideration of ranch operations," meaning that there would be no limit to how many could be killed! Please don't allow agricultural "diversification," so the lessees couldn't bring in pigs and sheep and plant row crops! This is a time when over 60 percent of the earth's animals have been killed off and one million species are slotted for extinction.

#6477

Name: N/A, N/A

Correspondence: The Sierra Club has made valid points opposing this plan.

As pointed out by the Sierra Club, pertinent laws include the 1916 NPS Organic Act which applies to all units of the national park system, PRNS and GGNRA (54 U.S.C. § 100101(a)); The PRNS legislation 16 U.S.C. § 459c-6 to 459c-7; The GGNRA legislation 16 U.S.C. § 460bb.

Custodians of the Point Reyes National Seashore (PRNS) and Golden Gate National Recreation Area (GGNRA) must realize the proposed General Management Plan Amendment is in conflict with your duty to protect against impairment of natural resources, 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. Why would you do this despite awareness that it is wrong?

#6478

Name: Bertsch, Eric

Correspondence: Elk are natural occupants of this area. Cattle are hardly native, and are introduced by man. Protect the elk. Stave off the cattle.

#6479

Name: Miller, Bob

Correspondence: I "discovered" PRNS in May, 1988 when I came from FL to participate in a photographic workshop; I had just started a professional photography business. I was truly AMAZED! One of the things that attracted me to the park, besides its natural beauty, was the presence of cattle and the farms/ranches. After learning about the history of the ranches, and how they gave up ownership of their lands to create the National Seashore, and therefore prevent real estate development, I couldn't express enough gratitude for these far-sighted people. By way of full disclosure, my family has a 100 acre farm outside of Philly, going back to 1756! To me, it seemed like a perfect "balance" between agriculture and nature. It could accommodate both elk and cattle.

I was disturbed when I heard that there were efforts afoot to remove the ranches. One of the arguments was that the cattle were destroying the environment there. I recently attended a lecture at the Pepperwood Preserve in Santa Rosa titled "The Forest Under Our Feet;" it was about our grasslands here in coastal CA. They posit that grazing is the highest and best use for these lands. Cattle grazing actually SEQUESTERS carbon and helps keep invasive species at bay, as well as preventing the thatch from becoming a problem. As long as riparian areas are protected, grazing cattle makes absolute sense to keep the grasslands healthy.

Knowing the financial difficulties on the ranchers, it makes perfect sense to allow other agricultural activities to take place, like growing vegetables, to help them financially. Eco-tourism also goes hand in hand with this; to show how agriculture and the environment can coexist.

To me, much of life is about "balance." I believe that the current arrangement of allowing both tule elk and ranching to coexist creates that "balance." BOTH contribute to the attraction of PRNS.

After doing some research, I believe that the decision to eliminate the oyster farm was the correct decision, primarily in that the area of operation was designated a wilderness area. I photographed the Johnson'd Oyster Farm in '95 for the Sierra Club for an article on aquaculture. I went out to the beds and saw the disruption this activity was causing. For a number of reasons, I was sorry to see it go, but I knew it had to be done to stick to the "plan."

I have lived locally for a number of years and I am a member of the PRNS Association. I visit the park as often as I can. I've had photographs of the park published in magazines, and up until a few years ago, you sold 3 of my postcards there, so I have a STRONG CONNECTION to PRNS, and care deeply about its future. I feel so strongly that I wrote a letter to the editor of the Santa Rosa Press Democrat supporting the ranches; it appeared 9/11/2019.

To me, the bottom line comes down to the fact that if it wasn't for the foresight of the ranchers in the 60's, there would not be a PRNS. Unlike many parks, THEY were here FIRST. It is because of them there IS a PRNS. I consider myself an environmentalist and I find that PRNS is a UNIQUE place. I HOPE it stays that way.

Thank you for considering my comments. Bob Miller

#6480

Name: Budde, Sharon

Correspondence: There are more than enough grazing areas in the U.S. without destroying wildlands. There is less call for red meat today than there has ever been and the trend is continuing. We do not need anymore grazing area.

#6481

Name: MacGregor, Hamilton

Correspondence: Alternative F appears to be the only one that supports your vision: "Imagine what this windswept, fog-enshrouded landscape may have looked like almost two hundred years ago, before the first cattle

made their way here." The cattle did not make their way, they were brought there. They are part of the history and should remain, but vastly reduced in scope. A large-scale, industrial dairy operation seems not to be what President Kennedy had in mind.

#6482

Name: Likens, K

Correspondence: Dear National Park Service,

Please reconsider your plan to kill elk and/or open up Point Reyes Park for any purpose other than for citizens and visitors to enjoy its natural beauty.

Thank you.

K. Likens

#6483

Name: N/A, N/A

Correspondence: Please don't kill the Tule Elk so that the cattle can graze. Every single day more and more people are giving up meat and dairy. Get with it.

#6484

Name: N/A, Tauny

Correspondence: The Point Reyes National Seashore, like the Golden Gate National park are both unique National Parks within an urban area, and as such they should be managed differently then the other wilderness area National Parks. When the Point Reyes National Seashore was created the ranchers agreed to let their ranches be within the boundary of the park with the understanding that they could continue raising cattle on their lands into perpetuity and the ranchers were given long term leases. Those ranches supply a large amount of milk to Bay Area consumers. Growing and consuming foods locally deceases our carbon footprint. We are living in a climate emergency we need to do everything we can to reduce our carbon footprint. Ranching has been going on in the Point Reyes National Seashore area for at least 100 years, and should go on for 100 more.

#6485

Name: Courtsal , Lyle

Correspondence: I am unalterably opposed to grazing and ranching and anything else on a vulnerable seashore park. Cattle ranching is extremely destructive to naturally occurring vegetation in a park setting on a dynamic coastline that will be eroding a lot more as time goes on. SAVE THE POINT REYES PARK AND GIT RID OF THE DANGED CATTLE, PERIOD. AND DON'T PLANT COW FOOD EITHER YOU STUPID BASTARDS!!

#6486

Name: Pennino, Augie

Correspondence: All the ranching alternatives in the Draft Environmental Impact Statement involve the impairment of natural resources. Three National Park Service laws prohibit actions that will impair natural resources (the 1916 NPS Organic Act, Point Reyes National Seashore legislation Section 459c-6, and Golden Gate National Recreation Area legislation Section 460bb).

Consequently, the Park Service should prepare a supplemental DEIS with ranching alternatives that comply with applicable laws requiring the protection of natural resources. The Park Service should then circulate that supplemental DEIS for public comment.

#6487

Name: Heubach, Randolph

Correspondence: Aside from the legal violations the Sierra Club has identified, allowing expansion of livestock grazing in these protected public lands would send exactly the wrong message about America's attitude toward the grave threat posed by accelerating climate change. Methane is recognized, even by climate change discounters, as a major greenhouse gas contributing significantly to the global warming crisis.

The medical community has long recognized the human health dangers of consuming too much red meat.

We need to reduce, not expand, our commercial populations of methane producing animals. It's time to apply common sense to the management of our public lands.

#6488

Name: Wells, Penny

Correspondence: I was shocked to see Phyllis Faber and Sarah Rolph's thoughtful analysis of the D.E.I.S. that was published in this week's Point Reyes Light. You appear to be guilty of either sloppy work or of deliberately providing misleading information. In either case, shame on you. Many of us that live here support MALT's position on ranching in Point Reyes National Seashore. It's been here longer than the park and needs to be respected and preserved. Things like this make it difficult to continue (as I have in the past) supporting the Park. Respectfully, Penny Wells

#6489

Name: Steen, Matthew

Correspondence: All the ranching alternatives in the Draft Environmental Impact Statement involve the impairment of natural resources.

Three National Park Service laws prohibit actions that will impair natural resources (the 1916 NPS Organic Act, Point Reyes National Seashore legislation Section 459c-6, and Golden Gate National Recreation Area legislation Section 460bb).

Consequently, the Park Service should prepare a supplemental DEIS with ranching alternatives that comply with applicable laws requiring the protection of natural resources. The Park Service should then circulate that supplemental DEIS for public comment.

#6490

Name: Janson, Darwin

Correspondence: I'm writing to support the public access and bicycling improvements outlined under Alternatives B, C, D, E, and F. I strongly support proposals that would lead to the planning and implementation of bicycling routes on trails, ranch roads, and pathways throughout the planning area, including: 1) a connection between Devil's Gulch and Platform Bridge Road using existing ranch roads, 2) a connection between Bolinas Ridge Trail at Olema Hill and Point Reyes Station to serve as an interim connection for the Cross Marin Trail, 3) a connection between Bolinas Ridge Trail and Five Brooks Stables using existing ranch roads 4) a connection between Drakes Estero and Abbotts Lagoon Trail using existing ranch roads, 5) a connection between Marshall Beach Trailhead and Pierce Point Road using existing ranch roads, and 6) an Estero Trail loop using existing ranch roads. I strongly encourage NPS to collaborate with ranchers and other stakeholders to educate the public and address concerns related to public access on working ranch lands.

The improvements outlined above would enable and encourage me to visit the Seashore more regularly-and by bike, rather than car. I would feel much safer riding in the Seashore and surrounding areas on trails, pathways, and

ranch roads, rather than on roads shared with fast-moving vehicular traffic. Bicycling opportunities are currently very limited and fragmented, so any improvements in connectivity and the creation of new loop options would enable me to enjoy more of the Seashore and surrounding areas by bike.

Thank you guys so much for your consideration!

#6491

Name: Hernandez, Cynthia

Correspondence: Please do not extend grazing licenses to cattle & anything else that threatens the environment & wild life.

#6492

Name: Dobson, R

Correspondence: Livestock have no business in Our Public Lands. They take away all of the Food necessary for our Natural Resources. Further they leave Cow Manure in the Public's Trails. Ranchers for far to long have had near free use of Public lands which ultimately cost the Taxpayer Millions of Dollars Each Year and public land Use needs to be Terminated for Ranchers be they sheep cows or any other livestock.

#6493

Name: Dosedal, Anke

Correspondence: Stop prioritizing cattle over native animals on park lands. Tule elk are an important part of the natural ecosystem, whereas cattle are not. Reduce the number of cattle if there is a conflict.

#6494

Name: Harrington , Robert

Correspondence: I'm writing to support the public access and bicycling improvements outlined under Alternatives B, C, D, E, and F. I strongly support proposals that would lead to the planning and implementation of bicycling routes on trails, ranch roads, and pathways throughout the planning area, including but not limited to: 1) a connection between Devil's Gulch and Platform Bridge Road using existing ranch roads, 2) a connection between Bolinas Ridge Trail at Olema Hill and Point Reyes Station to serve as an interim connection for the Cross Marin Trail, 3) a connection between Bolinas Ridge Trail and Five Brooks Stables using existing ranch roads 4) a connection between Drakes Estero and Abbotts Lagoon Trail using existing ranch roads, 5) a connection between Marshall Beach Trailhead and Pierce Point Road using existing ranch roads, and 6) an Estero Trail loop using existing ranch roads. I encourage NPS to collaborate with ranchers and other stakeholders to educate the public and address concerns related to public access on working ranch lands.

The improvements outlined above would enable and encourage me to visit the Seashore more regularly-and by bike, rather than car. I would feel much safer riding in the Seashore and surrounding areas on trails, pathways, and ranch roads, rather than on roads shared with fast-moving vehicular traffic. Bicycling opportunities are currently very limited and fragmented, so any improvements in connectivity and the creation of new loop options would enable me to enjoy more of the Seashore and surrounding areas by bike.

#6495

Name: N/A, Todd

Correspondence: I'd vote for Alternative E which preserves the wildlife, improves soil and water conditions, while still allowing for a majority of the ranches to remain active on the National Park.

#6496

Name: Cooper, Ray

Correspondence: Hello, I am recommending option "F". Please consider the long term health of the fragile ecosystem and the value of the rainforest in Pt Reyes National Seashore. Please also take into account the external costs that dairy incurs on others. This is not paid for by the industry and will be felt for years to come. I'm talking about chronic illness health costs, carbon footprint of feed, refrigeration footprints, and tax subsidies.

The will of the people is not to ranch in the Pt Reyes National Park.

Thank you

Ray Cooper

#6497

Name: Parmelee, Sukey

Correspondence: I support Alternative "F":

Phase out all ranching, as originally intended

Manage the Seashore the natural values it was created to preserve - its land, water and wildlife

Protect wildlife over livestock

Restore pastoral zone for wildlife habitat, native plant communities, scientific research and education

Repurpose the historic ranch buildings for research, interpretation and education

#6498

Name: Rodman, Curtis

Correspondence: I was stationed in Pt. Reyes in the Coast Guard in 1980-1982 as a Radioman. This is a very beautiful area and I would really be appalled by if the Oligarchs in Washington keep supporting the destruction of this area. Please protect our environment. Thank you.

#6499

Name: Bezanson PhD, David

Correspondence: Please withhold my addresses from public view.

The use of public lands for ranching presents many risks to the natural resources and recreational uses of these lands. Many of these cannot be mitigated.

Cattle are not native species. They have been introduced. This alters the interdependent balance of the biodiversity. The indigenous grazers, Tule Elk, are partially displaced by the introduced cattle. It also changes the character of the land from scenic/recreational to commercial. Visitors are not interested in seeing cattle and ranching infrastructure. They are drawn by the indigenous wildlife.



Cattle ranching operations pollute our surface waters more than any other agricultural use. Erosion and siltation are inflicted by cattle: This damages vegetation as well as aquatic life. Cattle damage the cryptocrust of pastures, diminishing the formation of healthy topsoil. Ruminants, including cattle, belch methane, a Greenhouse Gas that traps 80 times more heat than CO2 during its first 20 years in the atmosphere. Maintaining the herds and ranches requires use of transportation, which emits additional GHGs.

Leasing land to ranchers should be halted. They receive subsidies for their products and can afford to buy or lease privately owned land. Restore the indigenous biodiversity of rangelands by planting indigenous vegetation that thrives in that terrain and climate. E.g., use afforestation. We need to protect forests and ensure net afforestation to sequester more carbon and solve climate change.

#6500

Name: Tereschak, Cassandra

Correspondence: It is intolerable that ranchers and farmers are allowed to use OUR Point Reyes National Seashore to use and abuse at will!

This is a National Park that belongs to the ALL the American people not just a select few. The wildlife on the land should be protected not butchered for the pleasure of greedy ranchers and farmers!

There is already enough destruction of our waterways with the nitrogen runoff from the fertilizers that turn the oceans and bays into slimy death traps and are also causing the annihilation of the coral reefs !

Drakes Beach elk herd's population, which numbered a mere 124 animals in 2018, would be limited to 120 animals maximum-and the Limantour herd, which numbered 174 animals in 2018, would be "managed in consideration of ranch operations," meaning that there would be no limit to how many could be killed! Further, Alternative B allows for agricultural "diversification," so the lessees could even bring in pigs and sheep and plant row crops.

I urge you to adopt Alternative F, which would discontinue farming and ranching opportunities in the park and expand visitor opportunities. The preservation of native wild species must take precedence over farming and ranching activities. We are all aware that grazing negatively affects ecosystems, causing water pollution and soil erosion, spreading invasive species and disease, and harming endangered species.

Thank you and please do the right thing!

#6501

Name: Barringer, Debra

Correspondence: Only Alternative F is acceptable to me. When I visited PRNS, I was surprised that private ranching was still allowed on my public lands. With coastal federal lands being rare and the known impacts to native flora & fauna that intensive grazing can cause, this use is incompatible with sustaining this sensitive ecosystem. Allowing other agricultural uses is also unacceptable and would require a full environmental analysis of impacts. Tule elk are a rare enough sight, should not be culled for private interests, and have a greater value to me being the dominant herbivore on this land.

#6502

Name: Polish, Bret

Correspondence: I am writing to urge the National Park Service to discontinue the grazing of beef and dairy cattle at Point Reyes National Seashore. This precious area has been damaged by livestock grazing which poses a threat to the environment and local wildlife and it should be protected and used to serve the public good, and not for the benefit of the livestock industry.

I strongly oppose Option B and any other proposal that would be fatal to Tule Elk or other wildlife to the benefit of ranching operations, and encourage the agency to adopt Option F to discontinue grazing and allow members of the public to enjoy this beautiful park and to be enriched with opportunities to visit and appreciate this special place.

#6503

Name: Cole, Wulff

Correspondence: I'm speaking in defense of the wilderness destroyed by the cattle allowed crap all over and trash river and creek beds while poisoning the water with feces and urine so strong that standing on the fringe of a clearing 30 yards from the pool of waste I couldn't smell anything else. I'm speaking for the wild animals whose lives are ruined by the noise and destruction of cattle grazing on lands meant for public use, not private gain. But most importantly I'm speaking for the wolves and the other apex predators murdered so a few wealthy, welfare queen ranchers can make more money while paying less for their feed. The wolves and cougars and bears belong in the wilderness, cows do not.

#6504

Name: Zimmer, Louise

Correspondence: I am writing to urge the National Park Service to discontinue the grazing of beef and dairy cattle at Point Reyes National Seashore. This precious area has been damaged by livestock grazing which poses a threat to the environment and local wildlife and it should be protected and used to serve the public good, and not for the benefit of the livestock industry.

I strongly oppose Option B and any other proposal that would be fatal to Tule Elk or other wildlife to the benefit of ranching operations, and encourage the agency to adopt Option F to discontinue grazing and allow members of the public to enjoy this beautiful park and to be enriched with opportunities to visit and appreciate this special place.

#6505

Name: Romito, Alexandra

Correspondence: Elk should be able to roam freely without being killed by farmers and ranchers.

#6506

Name: Baggs, Barbara

Correspondence: Please Please keep COWS away from our National Parks..Thank you..

#6507

Name: Santillie, Charis

Correspondence: Any cattle ranching and other agricultural operations must be managed to accommodate elk and other native wildlife, and should not harm wildlife habitat. Commercial lease holders should not be allowed to dictate removal or exclusion policies of wildlife on our public lands.

I am opposed to the removal of any Tule Elk from PRNS and I urge NPS to reject any conversion of National Park lands to row crops or expansion of commercial livestock farming to introduce sheep, goats, turkeys, chickens or pigs which would only increase conflicts with wildlife, and degrade wildlife habitat and water quality.

#6508

Name: Cordes, John  
Correspondence: Dear National Park Service,

The EIS makes it clear that under all the alternatives for continued cattle ranching, there will be detrimental environmental consequences on the Park's natural resources, including soils, water quality, vegetation, and wildlife, including tule elk.

The National Park Service governing laws prohibit actions that will impair natural resources.

Consequently, the Park Service should not adopt any ranching alternative and prepare a supplemental DEIS with ranching alternatives that comply with applicable laws prohibiting the impairment of natural resources.

Just like the park service eventually stopped the oyster farming in Pt Reyes, it should also end the practice of cattle ranching. There is too little natural land left in our country is Pt Reyes is a great place to restore some of it.

I have hiked and camped at Pt Reyes numerous times over the decades and would like to see it returned to more natural habitat.

Sincerely, John

#6509

Name: Trombly, Merrillyn  
Correspondence: Please do not kill the Elk. They were here first!

#6510

Name: N/A, Hilary  
Correspondence: I am writing to urge the National Park Service to discontinue the grazing of beef and dairy cattle at Point Reyes National Seashore. This precious area has been damaged by livestock grazing which poses a threat to the environment and local wildlife and it should be protected and used to serve the public good, and not for the benefit of the livestock industry.

I strongly oppose Option B and any other proposal that would be fatal to Tule Elk or other wildlife to the benefit of ranching operations, and encourage the agency to adopt Option F to discontinue grazing and allow members of the public to enjoy this beautiful park and to be enriched with opportunities to visit and appreciate this special place.

#6511

Name: Ferris, Candice  
Correspondence: For our future and the health of this planet, it is not wise to destroy or remove animals from their natural habitat for more expansion to accommodate humans.

#6512

Name: Siva , Ariana  
Correspondence: Tule Elk have a right to live just as much as whoever is reading this. They require PROTECTION, not death. 24 ranchers making money hardly equals the lives of these beautiful creatures. It's unfair for California to lose these animals for 24 people.

#6513

Name: Bechler, A.

Correspondence: As a teenager concerned with the future of the natural world, I'm writing in support of the tule elk herds at Point Reyes National Seashore, and am strongly opposed to any plan to cull or otherwise remove this subspecies of elk. It is nothing short of appalling that these elk would be culled in order to support cattle grazing. Both a large contributor to climate change and environmentally destructive at a local scale, cattle ranching ought not take precedent over preservation of native species. Considering the worldwide threats to wildlife, we should be working to conserve as many species as possible, including tule elk. A whole subspecies should not be put at risk for the corporate gain of a few farmers. The natural heritage and history of Point Reyes National Seashore is made richer by these beautiful elk, and the so-called "heritage" of a few farms is incomparable to the value of this species. Prioritize nature over blind greed and destruction. Do not remove or alter the lives of the tule elk!

#6514

Name: Coburn, Della

Correspondence: Cattle are not native to North America, but bison are! Bison meat is much healthier than beef, and they should be allowed to roam freely on public lands!

#6515

Name: Boyd, Abby

Correspondence: I support Alternative F. You stopped the oyster farm but are going to let the dairy continue? What!! Please take it back to nature and for people not cows. The only way a dairy could be part is if it were like Wilder Ranch in Santa Cruz, which has very few animals and serves as an example of an old dairy farm. It is constantly booked for school field trips.

#6516

Name: Rothenberg, Rona

Correspondence: Dear Congressmen and Women and professional staff of the federal agencies, The great 20th century legacy of the public parks and lands for the benefit of Americans' enjoyment does not include subverting your mission to greed of individuals' personal wealth. The stunning news that public lands will be devoted to animal agriculture, particularly meat and dairy is thoughtless, short-sighted and unsustainable. To needlessly kill the natural animals that are still able to thrive there undisturbed and in beautiful harmony with the environment is unnecessary and belies an ignorance of the critical importance of our shrinking natural places

Please uphold the public trust of your mission and abandon your plan .

Rona G. Rothenberg, Architect

#6517

Name: Steele, Linda

Correspondence: Leave the elk alone.

#6518

Name: N/A, Robin

Correspondence: I'm writing to support the public access and bicycling improvements outlined under Alternatives B, C, D, E, and F. I strongly support proposals that would lead to the planning and implementation of bicycling routes on trails, ranch roads, and pathways throughout the planning area, including but not limited to: 1) a connection between Devil's Gulch and Platform Bridge Road using existing ranch roads, 2) a connection

between Bolinas Ridge Trail at Olema Hill and Point Reyes Station to serve as an interim connection for the Cross Marin Trail, 3) a connection between Bolinas Ridge Trail and Five Brooks Stables using existing ranch roads 4) a connection between Drakes Estero and Abbotts Lagoon Trail using existing ranch roads, 5) a connection between Marshall Beach Trailhead and Pierce Point Road using existing ranch roads, and 6) an Estero Trail loop using existing ranch roads. I encourage NPS to collaborate with ranchers and other stakeholders to educate the public and address concerns related to public access on working ranch lands.

The improvements outlined above would enable and encourage me to visit the Seashore more regularly-and by bike, rather than car. I would feel much safer riding in the Seashore and surrounding areas on trails, pathways, and ranch roads, rather than on roads shared with fast-moving vehicular traffic. Bicycling opportunities are currently very limited and fragmented, so any improvements in connectivity and the creation of new loop options would enable me to enjoy more of the Seashore and surrounding areas by bike.

#6519

Name: mauriello, CHRIS

Correspondence: I am writing to urge the National Park Service to discontinue the grazing of beef and dairy cattle at Point Reyes National Seashore. This precious area has been damaged by livestock grazing which poses a threat to the environment and local wildlife and it should be protected and used to serve the public good, and not for the benefit of the livestock industry.

I strongly oppose Option B and any other proposal that would be fatal to Tule Elk or other wildlife to the benefit of ranching operations, and encourage the agency to adopt Option F to discontinue grazing and allow members of the public to enjoy this beautiful park and to be enriched with opportunities to visit and appreciate this special place.

#6520

Name: McCann, Linda

Correspondence: I have watched the debate about ranching in Pt Reyes with growing concern. I support environmentally sustainable use of these lands to protect them for future generations including the following 1. requiring the ranchers to implement farming practices that protect the landscape, including soils and native grasses. 2. no expansion of the amount of land available for ranching. 3. No additional livestock such as sheep and chickens on an already fragile and degraded landscape 3. Protection of the tule elk herd and requiring ranchers to coexist with these native animals. Adding more domestic animals and expanding ranching will only exacerbate the problems. Much of what the Park has proposed goes against their mandate to protect these lands. There are options that would allow for both ranching and protection of Pt Reyes National Seashore, but what is proposed will not and should not be implemented.

#6521

Name: Sanchez, Ralph

Correspondence: I am writing to urge the National Park Service to discontinue the grazing of beef and dairy cattle at Point Reyes National Seashore. This precious area has been damaged by livestock grazing which poses a threat to the environment and local wildlife and it should be protected and used to serve the public good, and not for the benefit of the livestock industry.

I strongly oppose Option B and any other proposal that would be fatal to Tule Elk or other wildlife to the benefit of ranching operations, and encourage the agency to adopt Option F to discontinue grazing and allow members of the public to enjoy this beautiful park and to be enriched with opportunities to visit and appreciate this special place.

#6522

Name: Taylor, Kelly

Correspondence: I am utterly disgusted by the plan to kill native wildlife in favor of cattle. Our wildlife is an asset and essential for biodiversity. These elk are a beautiful part of the nature Marin has to offer - cattle, however, are everywhere and are destructive. This is a sick and disturbing proposition. I run in Marin regularly and would hate to see more cattle and less wildlife. I go to Marin to escape the barren cattle covered hills where I live! The bay area has enough sad tree-less hills full of cattle and their waste. This is a horrendous and disgraceful plan that goes against common sense.

#6523

Name: Tri, Carey

Correspondence: Please return this rare ecosystem back to it's original state. Remove cattle ranching. Protect diversity not dollars. Thank you.

#6524

Name: Walker, Jennifer

Correspondence: I'm tired of public lands being used for private businesses. Ranchers need to use their own land for grazing. Why are we considering killing animals that are there naturally for someone's business. Stop using tax payer lands for private businesses.

#6525

Name: Vittor, Jamilah

Correspondence: I am writing to urge the National Park Service to discontinue the grazing of beef and dairy cattle at Point Reyes National Seashore. This precious area has been damaged by livestock grazing which poses a threat to the environment and local wildlife and it should be protected and used to serve the public good, and not for the benefit of the livestock industry.

I strongly oppose Option B and any other proposal that would be fatal to Tule Elk or other wildlife to the benefit of ranching operations, and encourage the agency to adopt Option F to discontinue grazing and allow members of the public to enjoy this beautiful park and to be enriched with opportunities to visit and appreciate this special place.

#6526

Name: Brown, Katie

Correspondence: Allowing ranchers to encroach further upon the Tule Elk habitat is irresponsible and negligent of future generations. Animal agriculture is one of the leading causes of climate change, and we need to divest from this industry and lifestyle entirely. We are on the brink of the sixth mass extinction, and we should be doing everything to prevent further loss of habitat for an endemic species.

On top of the environmental damage more ranching would result in, the unnecessary breeding, exploitation, and killing of cows and other animals is unjustifiable. We cannot continue to pretend that these creatures are not also sentient beings with their own interests- - both the cattle population that is destined to be killed, and the Tule Elk that are at risk of being killed if ranching expands further into their habitat.

#6527

Name: Huggins, Roxana

Correspondence: Considering that these ranch lands were purchased decades ago with taxpayer money, they do

not belong to the ranches that continue to operate On public land. Giving them the opportunity to not only continue to use public lands with an unsustainable amount of cattle that degrade the public lands and limiting public use, but also allowing them to kill native wildlife to sustain their cattle on public land is not only catering to special interests, but irresponsible management of our lands and wildlife. Its time to dissolve the ranches off our public lands and remove the cattle along with all agricultural management and allow the land to heal from mismanagement and the degradation of the public lands. Alternative F is the only alternative that should be considered by the national park service which is also supposed to advocate for the public and its lands and its native wildlife, especially the low numbers of tule elk which were almost extinct. The few ranchers have had their free time with our public lands, its time for them to leave, like an overstaying houseguest that decides the house belongs to him. It doesnt matter what they want, end the leases and give us our lands back, they took the money and kept it when the ranches were purchased, its time to kick the squatters out and take their cattle with them.

#6528

Name: Erwin, Deborah

Correspondence: Please preserve the Tule Elk at Pt Reyes National Seashore! They should not be hunted down they are part of the Eco System. Thank you!

#6529

Name: , Peter

Correspondence: Hello- I would like to see all of the cattle removed from the Park.It's past time to do so. The ranchers were already compensated for their land, they are supposed to leave when the original rancher has died. Many people would like a below market lease on some Federal land. I could open a motorcycle park if I got a lease. How about another Playland-at the beach? I'm tired of well connected business interests using our federal lands on the cheap. Please stop. Thanks, Peter

#6530

Name: Stromberg, Susan

Correspondence: I oppose culling the Tule Elk here in order to prioritize cattle over the native animals and environment. I believe it is the job of the National Park Service to protect areas such as Point Reyes from degradation. The dairy farms are old and serve the local community - that is good. But expanding them and treating the tiny herd of reintroduced Tule Elk as if they are restricting dairies ability to operate is backwards thinking. There are more native animals that are threatened by expanding the farms, too. Please protect the national park.

#6531

Name: N/A, N/A

Correspondence: I've visited Point Reyes many times over the years. I've been with friends and family and on school trips. The ranches out there are sitting in one of the most beautiful locations in the US. They are lucky to be there. I'm not opposed to them continuing to be there, but the native wildlife should be preferred over the ranches. The Tule Elk were nearly extinct and have made an incredible recovery. The cattle should not be prioritized over the native wildlife.

#6532

Name: N/A, N/A

Correspondence: National Seashores are not meant to support cattle grazing and other agricultural activities, especially when they are supported by the taxpayers and other subsidies from the government. The priority should be Tule elk, since they are found nowhere else on Earth. National Seashores should be managed as a native ecosystem for native plants and animals and the enjoyment by the public through hiking(for example).

Commercial interests should not be considered when determining management decisions and the future direction of the seashore. Please reconsider your plan to allow cattle in this area. Thank you.

#6533

Name: Forrest, Patricia

Correspondence: I am writing to urge the National Park Service to discontinue the grazing of beef and dairy cattle at Point Reyes National Seashore. This precious area has been damaged by livestock grazing which poses a threat to the environment and local wildlife and it should be protected and used to serve the public good, and not for the benefit of the livestock industry.

I strongly oppose Option B and any other proposal that would be fatal to Tule Elk or other wildlife to the benefit of ranching operations, and encourage the agency to adopt Option F to discontinue grazing and allow members of the public to enjoy this beautiful park and to be enriched with opportunities to visit and appreciate this special place.

#6534

Name: N/A, N/A

Correspondence: I join Marin County Bicycle Coalition today in calling on National Park Service to establish a plan to create new riding opportunities on trails, pathways, and ranch roads throughout the 28,000 acres of public lands it currently leases for ranching.

Also, as a member of the Sierra Club, I strongly support all the existing ranching, and the continuation of dairy ranching in the park, an important part of this park's historic reason for being.

#6535

Name: Green, Michael

Correspondence: Ridiculous idea. Tule elk are indigenous. Dairy cows are not. Get rid of the cows. They thrive anywhere.

#6536

Name: Evnochides, fawnee

Correspondence: Dear National Park Service,

I support Alternative F. The cattle and dairy industry should be phased out and the land should be returned to its natural state.

It is a terrible idea to give 20 year leases to the cattle and dairy industry. Climate science shows that there is less than 12 years to mitigate the worst of climate catastrophe. Allowing business that has been linked to water pollution, species extinction and in Point Reyes is the culprit of over 60% of the greenhouse gas emissions, it is not a good idea to give that same industry a 20-year lease to continue degrading our national park. Point Reyes is a refuge to thousands of plants and animals. Point Reyes can be a leader in the fight for climate justice, and it starts with phasing out Beef and Dairy operations and restoring the land to its natural state. The EIS has NO MENTION of the effects of climate change in it, and does not include any information of the cattle and dairy's impact on climate change within the park.

Thank you for your attention.

Fawnee Evnochides



#6537

Name: Keifner, Shannon

Correspondence: I am writing to urge the National Park Service to discontinue the grazing of beef and dairy cattle at Point Reyes National Seashore. This precious area has been damaged by livestock grazing which poses a threat to the environment and local wildlife and it should be protected and used to serve the public good, and not for the benefit of the livestock industry.

I strongly oppose Option B and any other proposal that would be fatal to Tule Elk or other wildlife to the benefit of ranching operations, and encourage the agency to adopt Option F to discontinue grazing and allow members of the public to enjoy this beautiful park and to be enriched with opportunities to visit and appreciate this special place.

#6538

Name: Merkt, Anne-Sophie

Correspondence: Dear Sir or Madam, Please consider the preservation of native wild species as taking precedence over farming and ranching activities. Furthermore it would affect ecosystems, causing water pollution and soil erosion, spreading invasive species and disease, and harming endangered species.

Sincerely,

#6539

Name: N/A, N/A

Correspondence: I am writing to urge the National Park Service to discontinue the grazing of beef and dairy cattle at Point Reyes National Seashore. This precious area has been damaged by livestock grazing which poses a threat to the environment and local wildlife and it should be protected and used to serve the public good, and not for the benefit of the livestock industry.

I strongly oppose Option B and any other proposal that would be fatal to Tule Elk or other wildlife to the benefit of ranching operations, and encourage the agency to adopt Option F to discontinue grazing and allow members of the public to enjoy this beautiful park and to be enriched with opportunities to visit and appreciate this special place.

Sincerely, Waltraud Buckland

#6540

Name: Baum, Sebastian

Correspondence: I support Alternative F, phasing out cattle and dairy industry and returning the land to its natural state. The enabling legislation of the National Seashore supports wildlife protection and does not mention upholding private industry. The original leases to ranchers were to be 25 years. Ranchers have already been paid handsomely for their land, so it is long overdue to phase out the ranches. "Cultural Resource" and "Historic" does not mean industry needs to be currently in operation. Private business has no place on public land. Allowing industry and ranches to diversify their business is a bad idea. Already these ranches have been negatively impacting the land, mismanaged to allow soil erosion, scarring in the landscape, e.coli contamination in waterways and more. If you allow EVEN MORE agricultural practices on the seashore, there is no way to know the impact and there is no historical evidence you will be able to manage any negative impacts on the environment. Tule Elk should be protected for the survival of their species. They have already gone through a huge genetic bottle neck when they were almost completely wiped out except for 20 individuals. Every gene allele is important for the long term sustainability of the herd. The National Park should be protecting all Tule Elk, and allowing new herds to form and to TAKE DOWN THE FENCE at Pierce Point and allow all Tule Elk to roam free. I do not support

granting 20 year leases to cattle and dairy industry. Climate science has indicated we have less than 12 years to mitigate the worst of climate catastrophe. Allowing business that has been linked to water pollution, species extinction and in Point Reyes is the culprit of over 60% of the greenhouse gas emissions, it is not a good idea to give that same industry a 20-year lease to continue degrading our national park. Point Reyes is a refuge to thousands of plants and animals. Point Reyes can be a leader in the fight for climate justice, and it starts with phasing out Beef and Dairy operations and restoring the land to its natural state. The EIS has NO MENTION of the effects of climate change in it, and does not include any information of the cattle and dairy's impact on climate change within the park.

#6541

Name: Gruman, Vicki

Correspondence: I am writing to urge the National Park Service to discontinue the grazing of beef and dairy cattle at Point Reyes National Seashore. This precious area has been damaged by livestock grazing which poses a threat to the environment and local wildlife and it should be protected and used to serve the public good, and not for the benefit of the livestock industry.

I strongly oppose Option B and any other proposal that would be fatal to Tule Elk or other wildlife to the benefit of ranching operations, and encourage the agency to adopt Option F to discontinue grazing and allow members of the public to enjoy this beautiful park and to be enriched with opportunities to visit and appreciate this special place.

#6542

Name: N/A, N/A

Correspondence: Please don't let the National Park Service to gun down Point Reyes Tule Elk. Relocate them but be humane about it. These animals don't deserve to die.

#6543

Name: Chudacoff , Lori

Correspondence: I support Alternative F, phasing out cattle and dairy industry and returning the land to its natural state. The enabling legislation of the National Seashore supports wildlife protection and does not mention upholding private industry. The original leases to ranchers were to be 25 years. Ranchers have already been paid handsomely for their land, so it is long overdue to phase out the ranches. "Cultural Resource" and "Historic" does not mean industry needs to be currently in operation. The land and NATURAL resources are more important than mone. Please listen to people who do NOT have a vested interest in ranching. We do not need more meat or milk

#6544

Name: Barkley, James

Correspondence: I see no reason to change the regulations regarding either Point Reyes National Seashore or Golden Gate National Recreation Area. I believe the refusal to allow the Drakes Bay Oyster Company lease to be renewed was a mistake. Proper management of our national resources is necessary. However, wholesale elimination of many current situations I not warranted. There are other locations where detrimental activities are contemplated such as the Benson subdivision or he Santa Rita Open Pit Mine where the Sierra Club's efforts to stop both would be better spent. The coastal areas get more press so Sierra Club can raise more money but the magnitude of the detrimental impact on our environment of the two proposed moves in Arizona is much more significant.

#6545

Name: Feehan, Greg

Correspondence: I'm writing to support the public access and bicycling improvements outlined under Alternatives B, C, D, E, and F. I strongly support proposals that would lead to the planning and implementation of bicycling routes on trails, ranch roads, and pathways throughout the planning area, including but not limited to: 1) a connection between Devil's Gulch and Platform Bridge Road using existing ranch roads, 2) a connection between Bolinas Ridge Trail at Olema Hill and Point Reyes Station to serve as an interim connection for the Cross Marin Trail, 3) a connection between Bolinas Ridge Trail and Five Brooks Stables using existing ranch roads 4) a connection between Drakes Estero and Abbotts Lagoon Trail using existing ranch roads, 5) a connection between Marshall Beach Trailhead and Pierce Point Road using existing ranch roads, and 6) an Estero Trail loop using existing ranch roads. I encourage NPS to collaborate with ranchers and other stakeholders to educate the public and address concerns related to public access on working ranch lands.

The improvements outlined above would enable and encourage me to visit the Seashore more regularly-and by bike, rather than car. I would feel much safer riding in the Seashore and surrounding areas on trails, pathways, and ranch roads, rather than on roads shared with fast-moving vehicular traffic. Bicycling opportunities are currently very limited and fragmented, so any improvements in connectivity and the creation of new loop options would enable me to enjoy more of the Seashore and surrounding areas by bike.

#6546

Name: N/A, N/A

Correspondence: I strongly support alternative F!

Please do the right thing here.

God bless,

Van Hausman

#6547

Name: Catapano, Paola

Correspondence: I urge you to adopt Alternative F, which would discontinue farming and ranching opportunities in the park and expand visitor opportunities, in order to secure Elk protection and to develop alternative income sources. Thank you.

#6548

Name: McKenna, Olga

Correspondence: I'm writing to support the public access and bicycling improvements outlined under Alternatives B, C, D, E, and F. I strongly support proposals that would lead to the planning and implementation of bicycling routes on trails, ranch roads, and pathways throughout the planning area, including but not limited to: 1) a connection between Devil's Gulch and Platform Bridge Road using existing ranch roads, 2) a connection between Bolinas Ridge Trail at Olema Hill and Point Reyes Station to serve as an interim connection for the Cross Marin Trail, 3) a connection between Bolinas Ridge Trail and Five Brooks Stables using existing ranch roads 4) a connection between Drakes Estero and Abbotts Lagoon Trail using existing ranch roads, 5) a connection between Marshall Beach Trailhead and Pierce Point Road using existing ranch roads, and 6) an Estero Trail loop using existing ranch roads. I encourage NPS to collaborate with ranchers and other stakeholders to educate the public and address concerns related to public access on working ranch lands.

The improvements outlined above would enable and encourage me to visit the Seashore more regularly-and by bike, rather than car. I would feel much safer riding in the Seashore and surrounding areas on trails, pathways, and ranch roads, rather than on roads shared with fast-moving vehicular traffic. Bicycling opportunities are currently

very limited and fragmented, so any improvements in connectivity and the creation of new loop options would enable me to enjoy more of the Seashore and surrounding areas by bike.

#6549

Name: Shaw, Judith

Correspondence: Please read the POINT REYES LIGHT, September 19, 2019

Page 7

A comprehensive response to the draft environmental impact statement.

All the comments are also mine and it is urgent the Sierra Club not fall prey to the Amendment!!!!!!!

Judith

#6550

Name: Mier, RR

Correspondence: There is no need to replace elk or hunt them in a National Parks or on Federal Lands simply bring in predator species that the Government has eradicated bringing the balance back cows aren't a native species and should be treated as a invasive species once again the government forces their will on the people

#6551

Name: Goff, Frances

Correspondence: No one has the right to destroy wildlife in order to raise domestic animals to enrich themselves. Period.

#6552

Name: Groom, Ron

Correspondence: It's mind boggling in this day that a government agency would consider killing off an endemic species so we can grow more beef- especially in a national park. These elk were killed off once and re introduced. Any management would limit the gene pool and the herds resiliency to survive.

#6553

Name: Taylor , Sophie

Correspondence: Dear Sir/Madam,

I respectfully urge the NPS to adopt Alternative F, which would discontinue farming and ranching opportunities in the park and expand visitor opportunities. The preservation of native wild species must take precedence over farming and ranching activities. Grazing negatively affects ecosystems, causing water pollution and soil erosion, spreading invasive species and disease, and harming endangered species.

Yours faithfully, Sophie Taylor

#6554

Name: Gentle, Hope

Correspondence: If the agricultural interests using Point Reyes National Seashore are in conflict with the native species there, the obvious resolution of the conflict is to remove the existing operations and allow no further

development. The national parks are there to preserve our natural treasures for the people of the USA, not to subsidize private enterprise.

#6555

Name: Camal, Berta

Correspondence: Please consider not giving ranchers another lease. What we need is less pastures and more trees in this planet if we're to fight climate change! Meat consumption needs to lessen not increase! Wild creatures need to protected!!!

Thank you! Berta

#6556

Name: Stanojevic, Erica

Correspondence: The EIS makes it clear that under all the alternatives for continued cattle ranching, there will be detrimental environmental consequences on the Park's natural resources, including soils, water quality, vegetation, and wildlife, including tule elk.

The National Park Service governing laws prohibit actions that will impair natural resources.

Consequently, the Park Service should not adopt any ranching alternative and prepare a supplemental DEIS with ranching alternatives that comply with applicable laws prohibiting the impairment of natural resources.

#6557

Name: D'Angelo, Jennifer

Correspondence: Good Day,

I urge the NPS to adopt Alternative F, which would discontinue farming and ranching opportunities in the Point Reyes National Seashore and expand visitor opportunities.

The Tule elk are native to California and should be allowed to graze there. The preservation of native wild species must take precedence over farming and ranching activities. Cattle grazing negatively affects ecosystems, causing water pollution and soil erosion, spreading invasive species and disease and harming endangered species.

I appreciate you considering my feedback.

Respectfully, Jennifer D'Angelo

#6558

Name: Bishop, Mirja

Correspondence: I am writing to urge the National Park Service to discontinue the grazing of beef and dairy cattle at Point Reyes National Seashore. This precious area has been damaged by livestock grazing which poses a threat to the environment and local wildlife and it should be protected and used to serve the public good, and not for the benefit of the livestock industry.

I strongly oppose Option B and any other proposal that would be fatal to Tule Elk or other wildlife to the benefit of ranching operations, and encourage the agency to adopt Option F to discontinue grazing and allow members of the public to enjoy this beautiful park and to be enriched with opportunities to visit and appreciate this special place. Thank you

#6559

Name: Cole, Susan

Correspondence: I want to add my voice to those who oppose using this land for ranching cows. Specifically it is not appropriate to have cows on land that was never meant to sustain that kind of use. We know that raising animals for meat and dairy is going in the wrong direction for the health of the planet, our bodies and the animals. Please be on the right side of history and say no to the ranching/dairy and yes to the wild life, the land, our health and stop unethical breeding of cows.

#6560

Name: Kowalewski, Kathryn

Correspondence: Every sunday I hike the paths of Pt. Reyes. Last week it was Abbot Lagoon to Kehoe beach, returning on the road instead. At first I saw beautiful rolling prairie, a small wetland and a great horned owl! As I progressed towards the Abbots Lagoon parking lot, observing eroded hillsides, smelling the stench of cattle and then observing the numerous tiny white cages in the distance housing the young damned offspring, the good feelings were gone.

Are we not sick of commercial business considerations taking the front seat and driving the earth and its people into the ground. This is PARK LAND! Their leases are over! The dairy farms on the other side of Tomales bay are just as historical so nice try hiding behind that one. The answer is so clear. It is time for them to go. And quickly. Return the park to nature and the people.

#6561

Name: N/A, N/A

Correspondence: You know, I've been going to Point Reyes since my teens. It is a deeply magical place. The elk are a big part of that. Seeing a white elk appear out of the mist when I was out with my living history group, using Point Reyes as a stand-in for Scotland was an indescribable experience. It was a Child ballad come to life. And you want to remove these elk for commercial purposes? This land is one of the last wild places in the Bay Area that's actually accessible by bus, where we who live in the city can go to experience a small bit of what this land was like before we harvested the timber and tamed it. To sacrifice the elk for dairy cows is obscene! Ranching was supposed to have been phased out long ago! I support Alternative F wholeheartedly. The mission of the Park Service is to preserve the resources protected by the parks unimpaired for future generations. Do your job and get the cattle off this land. Ranching is not a cultural resource.

#6562

Name: Paulsson, Anna

Correspondence: The tule elk are a natural part of the Point Reyes ecosystem and play a key role in maintaining healthy biodiversity in the area. The elk were almost hunted to extinction and have been successfully reintroduced. Lethally removing the elk could permanently disrupt and destroy the ecosystem in Point Reyes and as someone who regularly uses the area and lives locally I want to see the area maintained for the future. Please leave the elk alone.

#6563

Name: Wolf, Susan

Correspondence: I do not support the diversification and expansion of ranching and agriculture on the public lands of Point Reyes National Seashore. I believe the Tule elk should be protected and nothing should be done

which would negatively impact the Tule elk. I am not in favor of extending the leases for dairy and cattle ranching on public land in Point Reyes!

#6564

Name: Meierotto , Danielle

Correspondence: I am writing to urge the National Park Service to discontinue the grazing of beef and dairy cattle at Point Reyes National Seashore. This precious area has been damaged by livestock grazing which poses a threat to the environment and local wildlife and it should be protected and used to serve the public good, and not for the benefit of the livestock industry.

I strongly oppose Option B and any other proposal that would be fatal to Tule Elk or other wildlife to the benefit of ranching operations, and encourage the agency to adopt Option F to discontinue grazing and allow members of the public to enjoy this beautiful park and to be enriched with opportunities

#6565

Name: Miller, Barry

Correspondence: I urge the National Park Service to adopt Alternative F with regard to the Tule Elk population at Point Reyes National Seashore, which would discontinue farming and ranching opportunities in the park and expand visitor opportunities. The preservation of native wild species must take precedence over farming and ranching activities. Grazing negatively affects ecosystems, causing water pollution and soil erosion, spreading invasive species and disease, and harming endangered species.

#6566

Name: Arteaga, Shelley

Correspondence: I am writing to urge the National Park Service to discontinue the grazing of beef and dairy cattle at Point Reyes National Seashore. This precious area has been damaged by livestock grazing which poses a threat to the environment and local wildlife and it should be protected and used to serve the public good, and not for the benefit of the livestock industry.

I strongly oppose Option B and any other proposal that would be fatal to Tule Elk or other wildlife to the benefit of ranching operations, and encourage the agency to adopt Option F to discontinue grazing and allow members of the public to enjoy this beautiful park and to be enriched with opportunities to visit and appreciate this special place.

#6567

Name: Schwarz, Cindy

Correspondence: We do not want the ranchers to use land for wildlife to graze cattle. Animal agriculture is responsible for the worst environmental problems. More so than cars or polluting businesses like gas or coal. They are ruining rain forests and even have killed people who are trying to stop them from tearing down trees. PLEASE do not allow the Tule Elk to be killed or removed in any way. Animal agriculture is not only responsible for animal torture but for the worst pollution on the planet. Stop them, don't help them.

Thank you.

#6568

Name: Hoffer, Cindy

Correspondence: Farmers and ranchers who have been leasing thousands of acres of the park to graze cattle apparently don't want to share these grasslands with elk, so the National Park Service is considering a plan that

would permit elk to be killed while allowing the expansion of agricultural activities! STOP!!!! Our National Parks should not be used for the profiteering ranchers. American taxpayers should not be subsidizing this land for ranchers personal and/or corporate profit. If the National Park Service would like to use some of the land for ranching; THEN LEASE THE LAND FOR WHAT IT IS WORTH and don't sell our American Parks at bargain-basement prices!!!!!!!!!!!!!!!!!!!!!!!!!!!!!!!!!!!!!!!!!!!!!!!!!!!!!!!!!!!!!!!!!!!!!!!!!!!!

#6569

Name: Lewis, Cynthia

Correspondence: All the ranching alternatives in the Draft Environmental Impact Statement involve the impairment of natural resources. Three National Park Service laws prohibit actions that will impair natural resources (the 1916 NPS Organic Act, Point Reyes National Seashore legislation Section 459c-6, and Golden Gate National Recreation Area legislation Section 460bb). Consequently, the Park Service should prepare a supplemental DEIS with ranching alternatives that comply with applicable laws requiring the protection of natural resources. The Park Service should then circulate that supplemental DEIS for public comment.

#6570

Name: Rusiniak, Karen

Correspondence: It is past time to remove domestic livestock operations from Point Reyes and dedicate the Point Reyes National Seashore to it's original mission: the preservation of native plants and wildlife. Livestock operations were supposed to have been removed over a 25 year grace period. Why has this not been done and delayed time and time again?

The approximately 600 native subspecies of tule elk are much more important to me and many visitors to this park than the 5,000 head of cattle which cause erosion, invasive species and pollution of the water, not to mention exacerbating climate disruption. I do not visit Point Reyes to see cattle! The idea of killing some of the tule elk is beyond ridiculous when there are only about 4,000 elk remaining in California out of a historic population of half a million. The 24 ranches still at Point Reyes need to be phased out and the land restored for native species. I support the adoption of "Alternative F".

#6571

Name: Aguilar, Nate

Correspondence: I drive almost 2 hours from my home to come to the Seashore because I want to see and experience the native wildlife in this part of the country. The mission of national parks is to protect native plants and animals, so I vote for the Park Service to adopt Alternative F and phase out all ranching.

#6572

Name: Mcallister, Helen

Correspondence: Limit the livestock. Public lands are for wildlife and people. We can make no decision as long as livestock lobbists are in charge.

#6573

Name: reZz, reZz

Correspondence: I'm writing to support the public access and bicycling improvements outlined under Alternatives B, C, D, E, and F. I strongly support proposals that would lead to the planning and implementation of bicycling routes on trails, ranch roads, and pathways throughout the planning area, including but not limited to: 1) a connection between Devil's Gulch and Platform Bridge Road using existing ranch roads, 2) a connection



between Bolinas Ridge Trail at Olema Hill and Point Reyes Station to serve as an interim connection for the Cross Marin Trail, 3) a connection between Bolinas Ridge Trail and Five Brooks Stables using existing ranch roads 4) a connection between Drakes Estero and Abbotts Lagoon Trail using existing ranch roads, 5) a connection between Marshall Beach Trailhead and Pierce Point Road using existing ranch roads, and 6) an Estero Trail loop using existing ranch roads. I encourage NPS to collaborate with ranchers and other stakeholders to educate the public and address concerns related to public access on working ranch lands.

The improvements outlined above would enable and encourage me to visit the Seashore more regularly-and by bike, rather than car. I would feel much safer riding in the Seashore and surrounding areas on trails, pathways, and ranch roads, rather than on roads shared with fast-moving vehicular traffic. Bicycling opportunities are currently very limited and fragmented, so any improvements in connectivity and the creation of new loop options would enable me to enjoy more of the Seashore and surrounding areas by bike.

#6574

Name: Vincent, Lisa

Correspondence: Please protect Point Reyes National Seashore and Golden Gate National Recreation Area by saying NO to dairy farming, cattle ranching, and private property ownership.

#6575

Name: Strawbridge, William

Correspondence: I enjoy both the scenic and ranching aspects of Point Reyes and feel they can be managed in harmony with one another. We need both space set aside for enjoyment and space that can be used to raise food. I think extending the current ranching leases another 20 years is a good idea as well as preserving current areas that are protected.

I also think most people don't understand that in the absence of predators, animals like the Tule Elk will proliferate until they outgrow their food supply. It is necessary then to either institute some form of birth control, move excess elk to other areas, or as a last resort reduce their numbers through hunting.

#6576

Name: Langlois, Cheri

Correspondence: Please stop the grazing rights on public land. I am the public and I do NOT want cattle decimating Point Reyes National Sea shore. It should be protected, for the natural wildlife and flora that can exist there and for the public good. It should not be used for the profit of the livestock industry. I oppose option B, which is just an excuse to harm tule elk and other wildlife. Please go with option F, to totally discontinue grazing and allow the public to enjoy this precious piece of our natural heritage.

#6577

Name: N/A, N/A

Correspondence: We would sure appreciate it if you allowed the Point Reyes Nat'l Seashore return to its NATURAL STATE, not one overrun by ranchers and dairy farmers. It's so terribly sad to see no visible wildlife. Only acres and acres of land set aside for cattle. We do everything we can to leave a zero carbon footprint. Riding our bikes to Point Reyes, being vegetarian, etc and our natural spaces have become areas of commerce. So frustrating and inappropriate and WRONG.

#6578

Name: Grant , Steve

Correspondence: As a long time mountain biker and marin county resident I can only see that what's makes riding

trails so amazing is the access to some of the best single track on the bay area and California. Unfortunately there are more people than ever before and the popular trails at China Vamp and Tamarancho are too crowded to enjoy on the weekends. We should have regulated access to more than the 28,000 acres of the Or. Reyes NP to enjoy for everyone. They could designate certain weekdays to make it available to mountain bike riders and issue permits to help pay for upkeep and maintenance. It would encourage more people while regulating when folks could access the beauty and grandeur of this one of a kind place we call home.

#6579

Name: Schembri, Michael

Correspondence: Dear NPS Committee,

I am writing to express my support for Alternative B (preferred plan) for the Point Reyes EIS. This option preserves the multiple intended uses of the park, since the 70's, and gives NPS new tools to manage the park regions in better ways. It also provides for new activities that could bring new people and interest to the area and allow lessees to diversify activities, while keeping in character with the park. And while it unfortunately requires limiting the size of the elk herd, it is the most reasonable and measured solution to an unfortunate situation-lack of natural predators-that allows NPS to do so selectively in the interest of the health of the herd (as opposed to allowing trophy based hunting permits).

Plan F is certainly an interesting option and worth considering. It could result in benefits to conservation and the expansion of natural habitats. However it is unclear how these particular lands would be affected by such a decision and exactly what the scope and measure of those benefits would be to conservation. While, the detriment to the existing ranching activities would most certainly be significant, and historic ranches without ranchers does not seem like a very compelling attraction. Finally, it would not address the lack of natural predators for the elk herd.

Plan C is by far the least attractive option, with little or marginal benefit to anyone and disastrous consequences for the herd and park visitors, and is in stark contrast to the park's wildlife preservation principals.

Point Reyes National Park is an incredibly unique resource, with a remarkable and rare geography, a combination of many landscapes in a single space that supports interests of many-hikers, campers, bikers, horses, conservationists, historians, native populations, as well as historic ranchers. It is a point of pride for our state and this nation and NPS should be given the tools necessary to continue to manage this treasured resource for all to enjoy.

#6580

Name: Mehl, Anastasia

Correspondence: I am against allowing private businesses on public lands. The ranches are negatively impacting the land. The ranchers have been paid for the land and the original lease was for 25 years. It is time to phase the ranchers out.

#6581

Name: Santurio, Alicia

Correspondence: I do not support granting 20 year leases to cattle and dairy industry. Climate science has indicated we have less than 12 years to mitigate the worst of climate catastrophe. Allowing business that has been linked to water pollution, species extinction and in Point Reyes is the culprit of over 60% of the greenhouse gas emissions, it is not a good idea to give that same industry a 20-year lease to continue degrading our national park. Point Reyes is a refuge to thousands of plants and animals. Point Reyes can be a leader in the fight for climate justice, and it starts with phasing out Beef and Dairy operations and restoring the land to its natural state. The EIS

has NO MENTION of the effects of climate change in it, and does not include any information of the cattle and dairy's impact on climate change within the park.

Tule Elk should be protected for the survival of their species. They have already gone through a huge genetic bottle neck when they were almost completely wiped out except for 20 individuals. Every gene allele is important for the long term sustainability of the herd. The National Park should be protecting all Tule Elk, and allowing new herds to form and to TAKE DOWN THE FENCE at Pierce Point and allow all Tule Elk to roam free.

#6582

Name: N/A, N/A

Correspondence: I urge you to adopt Alternative F, which would discontinue farming and ranching opportunities in the park and expand visitor opportunities. The preservation of native wild species must take precedence over farming and ranching activities. Grazing negatively affects ecosystems, causing water pollution and soil erosion, spreading invasive species and disease, and harming endangered species.

We must protect the few precious wild life spaces left to us to enjoy and share with native species.

#6583

Name: N/A, N/A

Correspondence: September 20, 2019

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

Dear Superintendent Muldoon:

The Point Reyes Seashore Ranchers Association (PRSRA), appreciates the opportunity to comment on the Point Reyes National Seashore (PRNS) and North District of Golden Gate National Recreation Area (GGRNA), (collectively the "Seashore"), draft Environmental Impact Statement (EIS) for the General Management Plan Amendment. This letter is the PRSRAs response to the draft EIS, acknowledging and supporting submission of separate comments by individual ranchers.

Last year, the Association commented on the Park Service's request for comments to the Notice of Intent for preparing the Environmental Impact Statement for a General Management Plan. The following comments build on our prior comments and pose questions requiring clarification to items addressed in the draft EIS.

We support the varied uses and environmental value of the PRNS and the GGNRA and believe the National Park Service (NPS) has developed a draft environmental impact statement (DEIS) for the General Management Plan Amendment (GMP Amendment) that raises many of the important issues related to dairy and ranch management. However, we believe the GMP Amendment and the preferred alternative have overlooked several key issues and must be better designed to recognize the historical, cultural, social, educational, scenic, and environmental values and opportunities of the working dairies and ranches in the limited area of the PRNS and GGNRA recognized as the Point Reyes Peninsula Dairy Ranches Historic District and the Olema Valley Dairy Ranches Historic District.

While we generally support Preferred Alternative B, the continued ranching alternative, presented in the draft EIS, there remain areas of concern that need to be addressed to achieve the goals for the GMP Amendment and the intent of the PRNS and GGNRA enabling legislation. These items include:

1. Establish an Advisory Committee to assist NPS on agricultural issues. To provide additional agriculture expertise, it should establish a PRNS Agricultural Advisory Committee, made up of such local agricultural and natural resource conservation experts as a representative from the local office of the USDA Natural Resource

Conservation Service, the Marin County Resource Conservation District, the Marin County Agricultural Commissioners Office, the University of California Cooperative Extension, and the Marin Agricultural Land Trust to advise PRNS decision makers on all agricultural planning and management decisions.

2. The Draft Foundation Document must be revised to recognize the existence and importance of ranching as part of PRNS. The draft Foundation Document will provide basic guidance for planning and management decisions. The draft Foundation Document is significantly deficient because it mostly fails to recognize historic and culturally important dairy and ranching. The Document contains several sections including Park Purpose, Park Significance, and Fundamental Resources and Values. All of these sections should be revised to recognize that the ranches can help to perpetuate the coastal grassland ecosystem, increase environmental awareness, promote the ethic of land stewardship and sustainable agriculture, support the local foodshed, and continue to favorably influence regional trends in the way food is produced, distributed, and consumed.

3. The DEIS seriously misleads the public and distorts the no-action alternative because it assumes no limit on the population level or geographic extent of tule elk at PRNS. The current applicable plan for tule elk at PRNS is the 1998 Tule Elk Management Plan and EA. The Elk Plan did not contemplate the expansion of elk into the ranchlands. DEIS p.5. However, the no action alternative which is used as a reference to describe the impacts and change that would occur in other DEIS alternatives, characterizes those alternatives as a reduction in the existing population level and the wide geographic spread of elk. In fact, given that the 1998 Elk Plan did not provide for elk on ranchland, the EIS must disclose that the alternatives that allow elk on ranchland amount to a huge and significant increase in elk. The failure to accurately characterize the current Elk Plan limitation that precludes elk on ranchland, distorts the effects of the alternatives in violation of the National Environmental Policy Act (NEPA). The NPS also violated NEPA and other management direction when it failed to exclude elk from ranchlands and follow the 1998 Elk Plan.

4. The preferred alternative must have a map that clearly establishes a limit on the geographic extent of tule elk. The only map regarding tule elk is Figure 2 which shows the current extent of elk in the planning area. DEIS A-2. The preferred alternative should include a map of the location where elk are permitted. Without a map of the permitted area, resource conflicts will arise.

5. The preferred alternative should exclude elk from the ranch land. Elk should be allowed on the PRNS but the Drakes Beach herd and the Limantour herd should not be present on the limited area of the PRNS which have ranches. This is because over the last 30 years NPS has not figured out how to effectively separate elk from cows; it would be better for elk if they are allowed to roam undisturbed in a much larger natural habitat in the Phillip Burton Wilderness instead of being subject to harassment, hazing, and lethal removal on ranch land; the elk consumption of forage will threaten the organic certification of ranches; elk damage ranch fences; elk consume forage that would otherwise be available to support cattle. If elk consume livestock pastures and supplemental forage for cattle is necessary, NPS should bear the cost of that forage. Also, elk were not part of the Dairy Ranches Historic Districts.

6. A fence should be constructed to effectively separate elk between the ranches and the Phillip Burton Wilderness area. The DEIS dismisses the possibility of an elk fence to keep elk in the larger Phillip Burton Wilderness. The elk fence could be designed and located to be only about 4 miles long, to terminate on the Inverness Ridge in dense vegetation, a wooded area, or at a significant drop off. A livestock fence already exists in this area, so it is readily accessible to build an elk fence. We believe the cost would be reasonable and, together with maintenance costs, would be much less costly than ongoing hazing, repair of ranch fences damaged by elk, and lethally removing elk.

7. The preferred alternative must establish a population level for the maximum number of elk in the areas where elk are permitted. In addition to providing a map that delineates the location where elk will be permitted, the EIS should set the maximum number of elk allowed in the area delineated. The number will guide management decisions and determine when the herd is beyond the permitted management capacity.

8. The analysis of diversification in the DEIS is incomplete and lacks historical and regional context. The DEIS gives the public the false impression that the diversification sought by ranchers is new and expansive. The final EIS should explain that farming and ranching outside the planning area is far more diverse. In addition, within the planning area farms and ranches historically included both irrigated and non-irrigated row crops including beans, peas, barley, artichokes and other vegetables and a wider variety of livestock species such as hogs and sheep.

9. The limitation of row crops to 2 ½ acres, permitted only in the ranch core, with irrigation and organic mulches prohibited, is unnecessarily restrictive and will not meet NPS goals. We appreciate the consideration of allowing ranches to diversify with some row crops. However, the limitations are so restrictive that they will not allow NPS to meet its goal for ranchers to respond to poor forage production years and fluctuations in economic markets. Only 2 ½ acres for the 24 ranching families amounts to less than 75 acres out of the 28,000 acres of ranch land. The core restriction is unreasonable because there may be more suitable soil for row crops outside the ranch core. Prohibiting irrigation severely limits crop varieties that can be grown. Non-pathogen, weed-free mulch from within the planning area should be allowed since weed-free straw is not available inside the planning area. The baseline restriction should be relaxed to allow up to 75 acres of row crops, on suitable soils within a mile of the ranch core, using mulch, and irrigation if excess water is available. We do not anticipate all ranches would elect to grow row crops.

10. The diversification that allows sheep and goats is too restrictive and will not achieve NPS goals of preserving open coastal grasslands. Diversification to allow sheep and goats could be helpful since these animals reduce the fuel load and graze on brush which encroach on grasslands threatening open vistas, wildlife habitat, and native plants. Unfortunately, sheep and goats are limited to the ranch core and pasture sub-zones. Management to limit brush encroachment in these subzones is already allowed such as planting, mowing, hay and silage production. These management practices are prohibited or more limited in the range subzone. NPS should provide more flexibility to allow sheep and goats to browse within the range subzone where there is a more significant threat to grassland by wildfire and brush encroachment and fewer tools available to control the brush.

11. The DEIS fails to recognize the environmental benefits of diversified farming and ranching. Diversified agriculture can provide important wildlife habitat and soil conservation benefits that should be considered in the DEIS. For example, vegetable waste from row crops can be fed to hogs and the hog manure can be composted with other organic materials to use on row crops or pastures.

12. NPS should consider educational benefits and enhanced visitor experience from diversification. We urge the Park Service to include other diversification such as minor on-farm processing, on-farm sales of products produced in the planning area, and farm tours. This will help enhance the visitor educational and recreational experience goals stated in the Purpose and Need.

13. The beneficial impacts to soils from carbon farming was not considered. The DEIS only considers adverse impacts to soils as a result of dairying and ranching. The NPS should consider carbon farming and the ecological benefits of implementing a carbon farm plan that would improve soils, increase soil carbon, and increase organic matter to benefit water quality and air quality. The NPS should consult with the Marin Carbon Project, Carbon Cycle Institute, and Marin Resource Conservation District who have expertise in this area. There is no excuse to ignore the beneficial effects of carbon farming.

14. The DEIS incorrectly equates fertilizer to compost and prohibits both. The use of organic compost should be allowed on all ranches. The DEIS fails to understand the benefits of soil amendments and inputs on soil health. Weed-free and pathogen-free compost can improve soil fertility enhancing water retention to minimize runoff and help sequester carbon. NPS should consult with the Natural Resource Conservation Service, the Marin Resource Conservation District, and University of California Cooperative Extension Service to analyze the best nutrient management practices that can be used on both dairies and ranches to improve soil health. 15. Nutrient management should be allowed on beef ranches and not be limited to dairies. Dairies have more productive soils than beef ranches because dairies feed their cows nutrient rich concentrated feeds, they have more cows per unit area than allowed on beef ranches, and dairies spread manure on pastures, all increasing the fertility of the soils.

The preferred alternative only allows soil fertility improvements on the pasture subzone, but soil fertility should also be allowed on the range subzone at least with compost on both dairies and beef ranches.

16. The DEIS fails to accurately assess air quality impacts from beef ranching relative to other uses of the PRNS. Since beef cattle spend most of their time on pastures and rangeland and not on bare ground, and are just occasionally gathered for removal from ranch land, the DEIS conclusion that beef cattle are the primary source of dust is unsupported. The DEIS also is misleading because it concludes that ranching represents 87% of the greenhouse gas emissions while vehicle emissions from the several million seashore visitors is less than 20%. However, this ignores the emissions from vehicles as visitors drive to and from the PRNS.

17. It is unclear how the reserve account(s) would operate and whether the reserve(s) account for NPS elected deferred maintenance. It is unclear whether one reserve account will be established that is available for maintenance on all the ranches or whether individual reserve accounts will be created for each ranch. It is equally unclear whether NPS would contribute to the reserve account given that NPS has not maintained the infrastructure on the ranches and should bear some financial responsibility to bring the infrastructure up to usable and safe condition.

18. Ranch Operating Agreements should not require new NEPA review and ESA consultation every year. The DEIS states that The ROA would be updated or reauthorized following the annual meeting, DEIS P.36. The DEIS does not define updated or reauthorize. Both these terms, especially reauthorize indicate a new decision each year that will require NEPA review and ESA consultation. This will grind implementation of the Plan to a halt and create annual opportunities for litigation. This is not in the interest of the NPS which has limited budgets and staff, and is not in the interest of accomplishing resource improvements, whose implementation will be repeatedly stalled. The annual meeting about the ROA and related documentation should be referred to as implementation of decisions previously made in the GMP Record of Decision and not an update or reauthorization. Otherwise, you are creating an annual opportunity to attack and stall the decisions which is not in the interest of good resource management.

19. We have concerns with your requirement in the lease addendum that states lease holders primary residence must be in the Park. This may not be feasible in many instances. The requirement of residency is not necessarily correlated to good stewardship of the leased property. We propose that the language states that the lease holder be directly involved in the day-to-day management of the operation of the leased agriculture property. The lease holder or his/her immediate family member should be the owner/operator of the agricultural operation. Subletting should not be allowed. The GMP Amendment is the foundation for providing the cultural resource, natural resource, and economic benefits envisioned by Congress when it established and preserved these magnificent areas and provided for continued ranching and dairying on the agricultural property. The Association is honored and grateful to be part of this longstanding history and we take great pride in continuing to ensure that ranching and dairying contribute to the agricultural heritage of Marin County and promote the environmental and scenic quality of the working landscapes of the Seashore. We also value our working ranches which provide an opportunity for the public to learn about where and how their food is produced and to learn more sensible ways of raising animals to provide our country with high quality agricultural products. The recent designation of historic ranches within the Park to the National Registry of Historic Places status supports the agricultural heritage of the ranches within the Park.

Please consider our comments stated in this letter and the previous scoping comments when preparing the final EIS. Thank you.

Sincerely,

Point Reyes Seashore Ranchers Association

Name: Ventrice, Monica

Correspondence: The Tule Elk should be protected, not culled. Farmers on Point Reyes National Seashore land should be gradually phased out so the area can be restored to its natural form, which includes a self-regulating Tule Elk population.

#6585

Name: Meyer, Amy

Correspondence: Point Reyes National Seashore is a complex, relatively small national park of 71,000 acres within a rural area and next to a suburban area. Because of its complexity, "neighborhood" context, lack of adequate government funding, and insufficient private funding compared to the GGNRA, staff struggles to keep abreast of its problems. I see this DEIS examination for a GMPA as an opportunity to help illuminate ways toward improved park care, more effective oversight and stimulation for increased funding. I support Alternative B of the GMPA DEIS.

I was a primary advocate for authorization of the Golden Gate National Recreation Area. I was vice-chair of the GGNRA/Point Reyes federal Advisory Commission for its whole existence, from 1974 until 2002. Thus I became very familiar with the outstanding landscapes and history that both of these parks protect for the national park system and that they offer to visitors.

Portions of both PORE and GGNRA, are the subject of this August, 2019 document. Legislation for both parks harks back to the 1916 Organic Act, but what is saved within national parks and how people visit them has evolved greatly since the time of that Act. The 1962 legislation authorizing Point Reyes came from the efforts of Congressman Clem Miller to save "a portion of the diminishing seashore of the United States that remains undeveloped." Author Hal Gilliam wrote a book about Point Reyes, "An Island in Time," whose title has been a quick way of characterizing the park.

Much of GGNRA's land is in and next to an urban area. When that park was authorized in 1972, the language of Congressman Phillip Burton reflected increasing NPS emphasis on cultural preservation and visitation: "to preserve for public use and enjoyment certain areas of Marin and San Francisco Counties, California possessing outstanding natural, historic, scenic, and recreational values...recreational and educational opportunities..." as well as protecting its scenery and natural features: "to preserve the recreation area, as far as possible, in its natural setting and protect it from development and uses which would destroy the scenic beauty and natural character of the area."

An important change came in 1976 to the PORE legislation that brings the legislation of the two parks close together. Congress said Point Reyes was to be administered 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, and based upon and supportive of the maximum protection, restoration, and preservation of the natural environment within the area."

Since 1978, PORE has administered that portion of the GGNRA north of the Bolinas-Fairfax Road. While controversy over the future of ranching in the park and management of tule elk dominate discussion about this DEIS, the park and public can benefit from a new document for park management. The combined 1980 GMP for these parks was of necessity broad-brush. Much has been learned about the resources of PORE and northern GGNRA since then.

Earlier in our history, national parks had only wild animals. Populations of some species were balanced by Native Americans who hunted them and by animal predators. Today, some national parks include ungulates that have to be managed by the NPS. To get some perspective on the proposed removal of elk at PORE, I asked park staff for statistics. They cited Rocky Mountain, Wind Cave, and Theodore Roosevelt National Parks which have each developed elk plan EISs. These parks have used qualified volunteers in their control efforts. In 2016, for example, 262 elk were removed from Wind Cave. NPS is also part of an interagency effort to manage bison populations in

the Greater Yellowstone. In the winter of 2017/2018, 1171 bison were lethally removed. In April 2019, six NPS parks around Washington DC donated 19,200 pounds of venison from white-tailed deer reductions to charities that feed families in need.

At Point Reyes there are no natural predators who can limit the growth of the tule elk herds. They have grown from 10 elk introduced in 1978 to about 730 elk. Somewhat fewer than half are in the Drakes Beach and Limantour herds that are within the scope of this DEIS. The tule elk are not an endangered or threatened species. Their number cannot continue to grow without constraint so a modest program of removing 10-15 elk each year is rightly proposed.

The federal Advisory Commission that helped public understanding and management of park issues was terminated in 2002. For an issue such as this DEIS it has been a great loss to the parks and public. The staffs of GGNRA and Point Reyes presented policies, projects and programs in the parks to the commission which took field trips to sites and heard public testimony. We advised the Secretary of the DOI on these topics through the superintendents who almost always followed our advice.

If we had a commission or other "sounding board" today, the caring public could be better informed about what would happen, for instance, to the scenic values of the park landscape if grazing by cows were to cease entirely. Such issues as the training and use of guard dogs for livestock who must not attack park visitors would receive public scrutiny. Generalized public presentation of what goes into a ranch lease document (consistent with privacy considerations) would enhance public knowledge and lessen rumors. The complex issue of "succession" could be aided by information to the public and also public input. There could be much better understanding of what is appropriate and necessary for "diversification."

The public would also learn about the ranches dating from the 1860s now listed on the National Register as the Point Reyes Peninsula Historic Dairy District and the Olema Valley Historic Dairy District. The Olema Valley district has already converted to beef. The closure of the Point Reyes district would mean some buildings might become a museum of dairying and the rest of its history and educational opportunities would gradually deteriorate and require removal. Far better to have a living history!

The new designations of ranch core, pasture and range provide demarcations of what will be expected to take place on a Seashore ranch. Individual ranch operating agreements (ROA) should include priorities. The ranchers have already been doing well in most areas that are measured for residual dry matter (RMD) in the fall of each year. But the DEIS points out that the condition of many of the park's structures is mediocre. A former Secretary of the Interior, Senator Feinstein and Congressman Huffman have called for twenty year leases so ranchers can invest in their buildings and infrastructure.

NPS uses \$400K received from ranching leases to support NPS staff work on the ranching areas of the park. Park staff needs to provide enough oversight to make sure that all agricultural operations permitted under Alternative B will be managed in a way that prevents water pollution and does not allow degradation of the range condition. As we have seen with the financially successful Golden Gate National Parks Conservancy, it will take more generous funding, private as well as public, for these parks to reach their full potential. Alternative B of this DEIS is a timely, necessary step.

Postscript: It has been foolish to have a 45 day comment period for a complicated document of over 700 pages. In the middle of this review, an Order came from the Secretary of Interior that e-bikes should be allowed on the trails of our national parks-- with 30 days notice. This kind of management of our national parks keeps the public that loves them in constant turmoil.



#6586

Name: Lowe, Margot

Correspondence: Please adopt alternative F. Save the Tule Elk.

#6587

Name: McClure, Robert

Correspondence: September 22, 2019

Superintendent Cicely Muldoon Point Reyes National Seashore 1 Bear Valley Road Point Reyes Station, CA 94956

Dear Superintendent Muldoon:

The McClure Family appreciates the opportunity to comment on the Point Reyes National Seashore (PRNS) and North District of Golden Gate Recreation Area (GGNRA) draft Environmental Impact Statement (EIS) for the General Management Plan (GMP) Amendment. We offer the following comments for consideration in this public comment period and will continue to participate in the process.

Currently, we milk a herd of organic Holstein milk cows within the PRNS. We also raise dairy replacement heifers. The dairy was certified organic in 2006. We also manage pastures and raise silage for our livestock. We have 8 non-family employees which are provided housing on the ranch for them and their families.

While we generally support Preferred Alternative B, the continued ranching alternative, presented in the draft EIS, there remain areas of concern that need to be addressed to achieve the goals for the GMP Amendment and the intent of the PRNS and GGNRA enabling legislation. These items include:

" The draft EIS does not address the negative impact of the free range elk on working ranches in the pastoral zone that are authorized to operate there through enabling legislation.

" Appendix I is a statistical probability model predicting an annual amount of residual dry matter (RDM). It does not consider or provide management direction for daily and seasonal forage demands of grazing livestock and the proposed free-range elk herds. By not addressing this current and existing competition in the planning area, the Draft EIS has failed to address the impacts of elk on grazing livestock operations.

" The draft EIS does not address adequate solutions to keep the Limantour herd in the wilderness area. Ranching currently uses less than 30% of the parkland. The EIS does not address the viability of removing elk from the pastoral zone and having the elk utilize the 70% rangeland area of the Park, thereby allowing elk and livestock to co-exist.

" The draft EIS is inadequate as it fails to detail how the monitoring of the Limantour herd and the removal of the Drakes Beach herd will be accomplished and during what time period.

" The proposed number of the Drakes Beach herd of 120 is not acceptable because it was never authorized to be an established herd on the agriculture properties.

" The draft EIS does not define what a new herd is. It lacks the definition of what constitutes a herd size. What steps will be taken to avoid new herds being established? What steps will be taken if a new herd is established?

" Leases-What is required? How will the requirements be implemented? What is the financial responsibility of the ranchers and the NPS? The explanation of the building upkeep requirement is not clear and poses misunderstanding.

" We have concerns with your requirement in the lease addendum that states lease holders' primary residence must be in the Park. This may not be feasible in many instances. The requirement of residency is not necessarily correlated to good stewardship of the leased property. We propose that the language states that the lease holder be directly involved in the day-to-day management of the operation on the leased agriculture property. The lease holder or his/her immediate family member shall be the owner/operator of the agricultural operation. Subletting will not be allowed.

" The draft EIS lacks a clear understanding of what happens to the leases after the 20 year term is up. A succession policy needs to be determined that addresses what happens in 5, 10, 15 or 20 years if either the rancher or the Park wants to terminate the lease. This section is inadequate. For example, how would personal assets of a former lessee be transferred to a new lessee?

We support more details provided to you in the Point Reyes Seashore Ranchers Association response letter submitted as part of this public response period. Thank you for your consideration of our comments.

Sincerely,

Robert and Ruth McClure Historic I Ranch

#6588

Name: King, Mary

Correspondence: Dear Superintendent Muldoon,

Thank you for the opportunity to submit comments on the Draft Environmental Impact Statement (DEIS) for a General Management Plan Amendment (GMPA) for Point Reyes National Seashore and the North District of Golden Gate National Recreation Area.

I first became aware of the Pt. Reyes Seashore area in the late 1960's while living in Southern California. Subsequently I moved to Northern California and began a more intimate relationship and love of this National Seashore. I have hiked in it, birded in it, kayaked on Tomales Bay, participated in classes and for nine years helped in monitoring its resident harbor seal population. As a graduate of the first UC-ANR California Naturalist class at Pt. Reyes I fell more deeply in love with the Seashore and more committed to its health and well-being.

I have taken the time to familiarize myself with the Draft Environmental Impact Statement (DEIS) for a General Management Plan Amendment. I am very deeply concerned with what I have seen proposed. Just three of the elements that are of most concern include: a proposal to increase visitor use of Drake's Estero by allowing boat-in camping on the Estero's shores; diversification of agriculture; and the management of tule elk for the benefit commercial lease holders.

1. Drake's Estero - This beautiful resource has suffered decades of abuse by oystermen. To now allow boat-in campers before it has had a chance to recover is not mindful planning. The impacts of boat-in campsites that have occurred on Tomales Bay will most certainly occur in Drakes Estero. Boat-in camp sites on Schooner Bay foreseeably will have significant impacts on the wilderness area of Drakes Estero, due to trash, human waste, and substantially increased visitor usage. Migratory birds and marine mammals will also be negatively affected. The DEIS includes no quantitative or descriptive details of any kind regarding boat-in camping that would allow analysis of or mitigation for its impacts. Please do not allow boat-in camping.

2. Diversification of Agriculture - I am opposed to any proposal to allow retail sales, ranch home stays and cheesemaking or the raising of goats, sheep and chickens or other non native animals. Along with increased ranching activities will come increased traffic, increased pollution, increased wildlife/human conflict, and increased pressure upon rangers to police such concerns. There are already insufficient rangers to keep the tourists and ranchers in line.

Further, the adverse effects from those species include potential increase in predation; disease or parasites; loss or degradation of habitat; construction of additional infrastructure (e.g. watering facilities, feed storage facilities, and pens); or the need for the use of non-wildlife friendly fencing.

I would hope that National Park Service would develop and analyze a new alternative that mitigates impacts from current ranching activities, eliminates activities that impair park resources and wildlife, and does not expand the agricultural activities beyond the present multigenerational ranching and dairying.

I am particularly concerned about impacts on wildlife. So little remains for them. Please do not allow expansion of agricultural related activities. Don't kill the goose that has preserved the golden egg!

3. Tule Elk - These native animals are a park wildlife resource that should only be managed for the benefit and non-impairment of the resource, not for the economic benefit of ranchers. A potential shortage of forage would not be due to elk, but to a combination of weather and the number of cattle. If there is insufficient space for elk and cattle, reduce the number of cattle allowed. The proposed plan is not consistent with the Organic Act's mandate that National Park resources be preserved, unimpaired, for the use and enjoyment of future generations. Please manage tule elk for their benefit.

Thank you for reading this and considering the comments of an engaged citizen who cares about Pt. Reyes National Seashore. I would hope that the interests of citizens and the greater good would guide the management of our public resources take precedence over the exploitation of our resources by private interests.

Sincerely,

Mary Ellen King

#6589

Name: Frazier, Chris

Correspondence: The Tule Elk at Point Reyes National Seashore are a national asset, not a creature to be shot in favor of cattle. Cattle can be raised anywhere, and are raised practically everywhere. Please do NOT move forward with the plan to allow slaughter of the elk at Point Reyes National Seashore. We need to save and protect our remaining remnant populations of wildlife, not further their destruction.

#6590

Name: N/A, N/A

Correspondence: The government paid \$50 million to farming and ranching families for the Point Reyes National Seashore national park in California. This area is now a national park and farming/ranching families have no claim to the land.

Two herds of Tule elk are now in danger of being killed because ranchers now want to claim the land for grazing cattle, land that they do not own and was put aside as a national park.

Please adopt Alternative F, which would discontinue farming and ranching opportunities in the park and expand visitor opportunities. The preservation of native wild species must take precedence over farming and ranching activities. Grazing negatively affects ecosystems, causing water pollution and soil erosion, spreading invasive species and disease, and harming endangered species.

Please adopt Alternative F.

#6591

Name: Moritsch, Barbara

Correspondence: I am so disappointed in the National Park Service. Actions that would be taken under the NPS' Preferred Alternative B in the Draft Environmental Impact Statement (DEIS) for a General Management Plan Amendment would be a travesty, a disgrace, and a grave disservice to the American people. Below are some of the reasons why Alternative B is so wrong-minded.

**1 THE AMERICAN PEOPLE PAID FOR THAT RANCH LAND TO INCLUDE THE LAND IN THE PARK, NOT TO SUPPORT RANCHERS.** The federal government (using American taxpayers' money) paid ranch owners tens of millions of dollars to purchase the ranches. Ranch owners retained a right of use and occupancy of not more than 25 years, or for a term ending at the death of the owner or the death of his or her spouse, whichever came later. By all rights, ranch owners should pay that money back to the government if they want to remain on the land.

**2 PERPETUAL RANCHING IS NOT SUPPORTED BY PORE'S ENABLING LEGISLATION** Ranching in perpetuity was never the intent of Point Reyes' enabling legislation. Political pressure, coupled with the NPS' lack of courage to end ranching has resulted in a long series of legislative manipulations that have allowed 24 ranches with more than 5,500 cattle to remain on park lands. The cows continue to degrade both park resources and the visitor experience.

Congress established Point Reyes National Seashore in 1962 not to preserve ranches and ranchers, but to "to save and preserve, for the purposes of public recreation, benefit, and inspiration, a portion of the diminishing seashore of the United States that remains undeveloped." The purchase of the ranches clearly indicates that the intent was to remove the ranching operations in support of the enabling legislation.

**3 PERPETUATING RANCHING DOES NOT APPEAR IN THE "STATED PURPOSES" OF EITHER PORE OR GOGA.** The DEIS itself (pp 1-2) defines the "stated purposes" of the two park units:

"The purpose statement identifies the specific reason(s) why Point Reyes was established and lays the foundation for understanding what is most important about Point Reyes.

The purpose statement for Point Reyes is as follows: Established for public benefit and inspiration, the Point Reyes National Seashore protects a rugged and wild coastal peninsula and surrounding waters, connecting native ecosystems, enduring human history and recreational, scientific, and educational opportunities.

The purpose statement for Golden Gate is (NPS 2014a): The purpose of Golden Gate National Recreation Area is to offer national park experiences to all, including a large and diverse urban population, while preserving and interpreting the outstanding natural, historic, scenic, and recreational values of the park lands.

**4 TULE ELK SHOULD NOT BE KILLED TO FACILITATE RANCHERS AND COWS** Point Reyes is the only national park unit that supports tule elk, and the NPS seems to be proud of its tule elk herds. However, under Alt. B a herd of 120 tule elk would be "maintained" at Drakes Bay; any additional elk in this herd would be killed (the NPS estimates 10-15 elk would be killed per year). This is unacceptable and goes against everything the NPS stands for.

PORE's website says:

"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."

With this General Management Plan Amendment, the NPS has an unprecedented opportunity to phase out the ranches as was intended in the Seashore's enabling legislation. Yet, contrary to all logic, the NPS' Preferred

Alternative actually expands agricultural opportunities for the ranchers. 5 ALTERNATIVE B, THE NPS' PREFERRED ALTERNATIVE IS A BLATANT GIVEAWAY TO THE RANCHERS, AT THE EXPENSE OF THE HEALTH OF PARK RESOURCES AND THE ENJOYMENT OF THE VISITING PUBLIC. Issuing 20-year leases to the ranchers, and allowing ranchers to diversify their agricultural activities by raising pigs, goats, sheep, and chickens; growing row crops; and establishing B&B's and retail farm stands would result in additional adverse impacts to soils, water quality, air quality, wildlife, and the visitor experience.

6 THE RANCHES HAVE ALWAYS HAD, AND CONTINUE TO HAVE ADVERSE IMPACTS ON PARK RESOURCES. Even the DEIS makes it clear throughout that the ranches and their operations pose significant threats and cause damage to the parks' air and water quality, native vegetation, and wildlife. They adversely affect the experience of park visitors, and prevent visitors from accessing a full one-third of their park lands. More specific details are provided below.

The DEIS significantly down-plays the impacts of ranching on wildlife-fix that and be honest.

### Birds

The DEIS states: Point Reyes hosts the greatest avian diversity of any national park unit in the United States and nearly half of the bird species of North America, with around 490 species recorded from approximately 60 bird families. Many birds use the planning area for a portion, or all of their life history, particularly during spring migration and summer nesting.

Ground-nesting species, such as California horned lark, savannah sparrow, grasshopper sparrow, song sparrow, western meadowlark, California quail, and northern harrier could be susceptible to impacts from cattle grazing and vegetation management (e.g., plowing and harvesting). Agricultural activities that affect songbird populations could also affect the foraging of American peregrine falcons and merlins. Several other special-status raptors rely on grassland habitats, including the burrowing owl, white-tailed kite, and ferruginous hawk, and could be affected by habitat alteration from livestock grazing and vegetation management. Stop using the word "could." The truth is all of these species are adversely affected by ranching.

Agricultural activities in the planning area attract and concentrate birds that would not be there in such abundance otherwise, including common ravens, brown-headed cowbirds, European starlings. Nest parasitism by brown-headed cowbirds or competition with non-native European starlings for cavity nesting sites negatively affects native birds. Ravens are nest predators of the federally threatened western snowy plover, which nests on beaches adjacent to the planning area.

Add this to be clear: Thus, continued ranching will adversely affect native birds that are harmed by common ravens, brown-headed cowbirds, European starlings. Fish

From the DEIS: Three federally threatened anadromous fish that could occur include coho salmon, steelhead (an anadromous rainbow trout), and Chinook salmon. The Lagunitas Creek watershed supports one of the largest remaining spawning populations of the Central California Coast coho salmon evolutionarily significant unit. Steelhead from the Central California Coast distinct population segment occur in the planning area in the Lagunitas and Olema Creek watersheds and in tributaries to Drakes Estero. Chinook salmon from the California Coastal evolutionarily significant unit are sporadic visitors to the Lagunitas Creek watershed; only a few adults have been observed in 12 of 17 years.

Other special-status fish in the planning area could include the Pacific lamprey, western river lamprey, and the riffle sculpin. Historical logging, development, and grazing in the planning area have negatively affected fish habitat as a result of sedimentation, loss of habitat complexity, and diminished riparian ecosystem function. Major perennial streams that are habitat for federally listed fish in the Tomales Bay watershed (Lagunitas and Olema Creeks) either do not have adjacent grazing or have been fenced to exclude cattle.

There is no question agricultural activities contribute to habitat degradation and reduced water quality and quantity for fishes. You need to more directly state this in the DEIS.

Reptiles and Amphibians From the DEIS: A dozen species of reptiles could occur in the planning area. This implies more data are needed to understand the impacts of ranching on reptiles. State this fact.

The western pond turtle, a California species of special concern, uses freshwater ponds and backwater areas of large streams in the planning area. Four lizard species occur in almost every habitat, except the dampest, most interior forests and tidal salt marshes, and eight snake species could occur in the planning area. Amphibians in the planning area, found in and near streams and ponds, include six species of salamanders and four species of frogs and toads, including the non-native bullfrog. Although extirpated or greatly reduced throughout its range in California, the federally threatened California red-legged frog is still locally abundant in the planning area. Several populations inhabit the park, and the NPS has recorded 136 known occurrences in the park, primarily associated with stock ponds. Also, the coast range newt, a subspecies of the California newt, is a special-status species found in the planning area.

The Draft EIS states: Agricultural activities could affect habitat suitability and water quality for reptiles and amphibians. This is far too vague and the potential impacts on reptiles and amphibians should be described in much more detail.

According to the Center for Biological Diversity: "...today the world's herpetofauna are among the most imperiled species on Earth. Ubiquitous toxins, global warming, nonnative predators, overcollection, habitat destruction and disease are key factors leading to their demise. Globally, 989 species of reptiles, or almost 20 percent of evaluated species, are endangered or vulnerable to extinction, according to the International Union for Conservation of Nature's Red List. The situation is even worse for amphibians. More than 2063 species of frogs, toads and salamanders - more than 31 percent of the world's amphibians - are at risk of dying out. And scientists lack sufficient information to even assess the status of more than 20 percent of the world's herps. These species are slipping away faster than we can study them."

The above quote should be included in the DEIS.

According to the Draft EIS: Thousands of aquatic and terrestrial invertebrates inhabit the planning area. Limited information about the diversity and distribution of these species is available. Numerous flying insects are important pollinators of native plants, which could be affected by livestock grazing and vegetation management activities. Other aquatic invertebrates, including numerous insects, are important indicators of water quality and support aquatic food webs that could be affected by runoff from agricultural activities.

Two federally endangered invertebrates are known to occur in the planning area, the Myrtle's silverspot butterfly and California freshwater shrimp. Surveys done in 2004 for Myrtle's silverspot butterflies showed occurrences on 13 ranches, all of which support livestock operations. California freshwater shrimp are found in Lagunitas Creek and lower Olema Creek.

Survey data for the federally endangered Myrtle's silverspot butterflies are 15 years old-these data are inadequate for assessing impacts of ranching activities on this species.

Ranching does not enhance the visitor experience-it does the opposite.

According to the Draft EIS, ranching operations diminish the visitor experience. Visitors encounter cattle on trails and roadways in the park, and have noted concerns regarding electric fencing, interactions with cattle, and manure management.

**7 ALTERNATIVE F IS THE ONLY ALTERNATIVE THAT IS IN KEEPING WITH THE ENABLING LEGISLATION AND STATED PURPOSES OF THE PARKS.** Data presented in the DEIS all support the

adoption of Alternative F, not Alternative B. Alternative F would benefit soils, water quality, air quality, elk, and the experience of park visitors. Impacts of Alternative F on vegetation and soils cannot be easily summarized, but if the NPS would commit to habitat restoration after the cows are removed, both vegetation and wildlife would benefit overall from cessation of ranching. The same cannot be said about any of the other alternatives.

The NPS' plan to retain and expand ranching activities on park lands is purely political. A few very recent developments affecting the planning area illustrate this point. First, the Olema Valley Dairy Ranches Historic District was listed in the National Register on April 9, 2018, and the Point Reyes Peninsula Dairy Ranching Historic District was listed on October 29, 2018. Why didn't these listings happen earlier? Because the listings were done to try to more firmly anchor ranching into the parks.

Second, Congressman Jared Huffman sponsored a bill that directed the Secretary of the Interior "to manage agricultural properties consistent with Congress' longstanding intent that working ranches and dairies continue to be authorized to operate on agricultural property within the Point Reyes National Seashore and Golden Gate National Recreation Area" and authorized issuance of leases or special use permits of 20 years. The bill was passed by the United States House of Representatives, but fortunately the bill died in session. There are fears that even if the NPS decided to adopt Alternative F and phase out the ranches, that certain politicians would quickly try to end run the agency yet again.

8 IF THE NPS' PREFERRED ALTERNATIVE IS ADOPTED IT'S LIKELY THAT RANCHING ON THESE PARK LANDS WILL NEVER END, THE LAND WILL CONTINUE TO BE DEGRADED, AND THE MILLIONS OF DOLLARS THE AMERICAN PEOPLE PAID FOR THESE LANDS (MONEY THAT HAS BEEN KEPT BY THE RANCHERS) WILL BE FOR NAUGHT. It's time to phase out the ranches and manage the parks for the superlative natural beauty and diversity they offer-it's time to adopt Alternative F.

#6592

Name: Flagg, Debra

Correspondence: To Whom It May Concern:

It is unconscionable to continue to kill innocent animals for existing in an environment that continues to be stripped of its nature. Who in their right mind would kill animals for the sake of creating space for MORE animals?! Saving our environment and the sustaining population of tule elk is the better solution than to continue to kill animals for their existence and a population that is slowly fading away. Extinction is FOREVER! Remember this when you look around at the population of humans who are destroying the earth and all that is within it!

#6593

Name: Lipscomb, Linda

Correspondence: Dear Sir or Madame: Please do not allow the extension of leasing of public lands to cattle grazing, or other commercial agricultural pursuit. I also have heard that you are considering expanding the type of commercial farming activity, i.e., diversification, to occur on public lands at Point Reyes seashore.

The public has already paid for this land to be kept wild. Currently, the Park Service is permitting this public land, and the native species which originally inhabited it, to be despoiled and destroyed. This is a travesty, a disgrace, and is certainly outside the bounds of the legislation which protects the land from exploitation. The Park Service is clearly in breach of the fiduciary duty it owes to the people of the US who paid for this wild land to be set apart from exploitation. And of course, it is an utter betrayal to allow the native species to suffer and die, or to be displaced, due to what may very well be illegal exploitation of this land by commercial agribusiness.

There is no saving grace to be had in falsely identifying these commercial "farms", which are despoiling both land and species, as historical and/or bucolic! You simply must stop this activity,, and allow the land to be returned to the public as was intended and authorized under the law. Please adhere to your responsibility on this matter, and

reverse current plans to expand these destructive practices! Do what you are charged to do under law! Very truly yours, Linda G. Lipscomb

#6594

Name: Wallerstein, Emma

Correspondence: The preservation of native wild species must take precedence over farming and ranching activities. Grazing negatively affects ecosystems, causing water pollution and soil erosion, spreading invasive species and disease, and harming endangered species.

#6595

Name: Pondella, Colette

Correspondence: Keep public lands intended for wildlife free from private industry's abuses and pollution. Hold them accountable. They are subsidized way too heavily already, now we have to clean up their s#&t too...literally?

#6596

Name: Tanner, Almira

Correspondence: Please do not kill or "cull" the Tule Elk! The real harm is coming from cattle farming and the dairy/meat industries which pose a great threat to the local and global environment.

I support Alternative F, phasing out cattle and dairy industry and returning the land to its natural state. The enabling legislation of the National Seashore supports wildlife protection and does not mention upholding private industry. The original leases to ranchers were to be 25 years. Ranchers have already been paid handsomely for their land, so it is long overdue to phase out the ranches. "Cultural Resource" and "Historic" does not mean industry needs to be currently in operation.

I do not support granting 20 year leases to cattle and dairy industry. Climate science has indicated we have less than 12 years to mitigate the worst of climate catastrophe. Allowing business that has been linked to water pollution, species extinction and in Point Reyes is the culprit of over 60% of the greenhouse gas emissions, it is not a good idea to give that same industry a 20-year lease to continue degrading our national park. Point Reyes is a refuge to thousands of plants and animals. Point Reyes can be a leader in the fight for climate justice, and it starts with phasing out Beef and Dairy operations and restoring the land to its natural state. The EIS has NO MENTION of the effects of climate change in it, and does not include any information of the cattle and dairy's impact on climate change within the park.

#6597

Name: McHugh, Heather

Correspondence: I am writing to urge the National Park Service to discontinue the grazing of beef and dairy cattle at Point Reyes National Seashore. This precious area has been damaged by livestock grazing which poses a threat to the environment and local wildlife and it should be protected and used to serve the public good, and not for the benefit of the livestock industry.

I strongly oppose Option B and any other proposal that would be fatal to Tule Elk or other wildlife to the benefit of ranching operations, and encourage the agency to adopt Option F to discontinue grazing and allow members of the public to enjoy this beautiful park and to be enriched with opportunities to visit and appreciate this special place.

#6598



Name: Kucera, Thomas  
Correspondence: 22 September 2019

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

Sent electronically to: <https://parkplanning.nps.gov/document.cfm?documentID=97154>

These are my comments on the draft environmental impact statement (EIS) for a general management plan amendment (GMP Amendment) for Point Reyes National Seashore (PORE) and the north district of Golden Gate National Recreation Area (GGNRA) prepared for the National Park Service (NPS) to update management guidance for more than 28,000 acres of national park system lands, including all lands currently leased for beef and dairy ranching. As background, I am a Certified Wildlife Biologist (M.S., University of Michigan, 1976; Ph.D., University of California, Berkeley, 1988) with professional experience with a wide variety of wildlife species throughout California. I was Elk Program Coordinator at PORE in the late 1990s, during the establishment of the Limantour herd.

The Mission Statement of NPS, as stated on the NPS website, is: "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." This mission is mandated through laws such as the 1916 Organic Act and the PORE and GGNRA statutes.

This legally mandated unimpaired preservation of resources for the enjoyment of this and future generations is directly at odds with the NPS' preferred alternative, Alternative B, which continues and intensifies the current commercial agricultural activities that have been degrading land, air, water, and wildlife on these NPS lands since the establishment of PORE. I will not catalog all the insults to land, water, air, and native wildlife at PORE caused by agricultural activities over the years; many of those are discussed in the EIS. How the NPS can continue to ignore the law and continue and intensify these insults to public land from a relatively few commercial agricultural operations has baffled me for decades. One can only conclude that the fix is in, and wonder which politicians and economic interests have leaned on PORE management to favor illegal, intensive, ecologically damaging commercial agricultural activities in a national park over resource preservation and ecological restoration for the enjoyment of future generations.

On a recent visit to PORE, I noticed, as I have for thirty years, vast acreage turned to cow-burnt wasteland, ground to dust by cattle in this dry season, with extensive trailing made by cattle, slumping and other types of erosion, and streams and other wetlands degraded by eutrophication and trampling. The blooms of yellow-green algae fouling several ponds and other waterways were particularly distressing. I watched cow manure being spread by truck on these public lands, some immediately adjacent to heavily traveled public roads, with apparently no thought to the potential of spreading the bacterium *Mycobacterium avium* subsp. *Paratuberculosis* (MAP) to humans or wildlife, or even to livestock that might not yet be infected. This organism, the cause of Johne's disease, infects livestock, and has infected the local elk, a native species reestablished at PORE after a long absence with much effort and substantial cost. It is known that Johne's disease can be transmitted to a variety of wildlife such as rabbits, foxes, mustelids, and primates, as well as ruminants. All those types of wildlife exist as natives at PORE, with the exception of non-human primates. There is also thought that Johne's disease may infect humans, and be involved with Crohn's disease. The manure trucks I recently saw trailed large quantities of manure and mud from the fields and deposited this material onto the adjacent paved, public roads in PORE. When driven over by visitor traffic, this manure is easily dispersed into the air, potentially exposing people driving past. Manure spraying could present another, aerial route of infection to humans and native wildlife. However, I saw no discussion of this potential disease transmission, to humans or wildlife, in the EIS. Manure management is treated offhandedly as just another dairy management operation, as if it were not occurring on National Park System lands but rather on a private farm.

Livestock other than cattle, including pigs, goats, sheep, and horses, as well as domestic dogs, can also be infected with MAP. These domestic species currently exist at PORE or are to be included in the "diversification" of

agricultural activities in the Preferred Alternative. None of the disease issues regarding other livestock species, nor potential of disease transmission to wildlife, is discussed in the EIS. (For information supporting this MAP discussion, see Manning et al., *Journal of Wildlife Diseases* 39(2), 2003, pp. 323-328 (a paper, of which I am second author, reporting on research performed at POE), and the Johnes's Information Center, University of Wisconsin - Madison School of Veterinary Medicine <https://johnes.org/>.)

Other types of ecological degradation caused by the intensive agricultural operations at PORE contribute to the inability of PORE to fulfill its NPS mission and obey the law. The list of ecological insults from intensive, commercial agriculture on NPS land is a lengthy one, and I only mention a few here. Cutting silage in spring directly kills native wildlife such as ground-nesting birds and newly born black-tailed deer fawns, which hide in vegetation for several weeks after birth until they can better follow the dam. A new study published in one of the world's leading science journals ("Decline of the North American avifauna." [science.sciencemag.org/cgi/content/full/science.aaw1313/DC1](https://science.sciencemag.org/cgi/content/full/science.aaw1313/DC1)) documents a dramatic reduction in North American birds, attributable to "habitat loss, agricultural intensification, coastal disturbance, and direct anthropogenic mortality." These factors are inherent in the silage cutting, and indeed, all proposed agricultural activities at PORE, and are in direct conflict with PORE's NPS mission. The EIS minimizes silage cutting as just a "routine activity" although, in addition to killing native wildlife, silage production includes discing the soil and seeding non-native plants. Further, killing native elk because they eat vegetation on NPS lands that agricultural interests think belongs to their livestock is the height of insanity, and gives the lie to the NPS mission to "preserve unimpaired the natural and cultural resources and values of the National Park System." Importing alfalfa or other supplemental feed for cattle introduces and spreads the seeds of non-native, weedy, vegetation. Proponents of agriculture at PORE claim their agricultural activities are "sustainable"; how can sustainability require the import of hundreds of tons of hay and the weed seeds therein?

It is clear that there is only one alternative that will allow PORE to obey the law and meet its NPS mission: Alternative F would remove all commercial agricultural activity, allow PORE soils, water, and wildlife to recover, and preserve a much more wild and natural ecosystem to preserve and for generations of park visitors to enjoy. There is no shortage of agricultural land adjacent to the park; what is increasingly rare are large areas of wild lands. As human populations in the Bay Area, California, and the US increase, and as the climate implications of livestock operations are better understood, such wild lands will only increase in importance over time.

Alternative F needs to include a program of ecological restoration to facilitate healing of the many ecological wounds caused by agriculture at PORE. A smaller-scale ecological restoration program is currently ongoing in the nearby Presidio in San Francisco, so such an idea is current, local, and successful. No doubt it will take decades to ameliorate a half century of agricultural damage to these public lands that occurred under NPS management; such time is relatively short in the perspective of nature, and every year under this alternative, conditions would be improving. Only with Alternative F could NPS could finally approach fulfilling its mission.

Thus, agricultural activities at PORE are inherently in conflict with the NPS mission to "preserve unimpaired the natural and cultural resources and values of the National Park System for the enjoyment, education, and inspiration of this and future generations." Congress in 1978 explicitly allowed ranching at the discretion of the Secretary, and is thus explicitly not mandatory, and may occur only "without the impairment of its natural values." (16 U.S.C. § 456c-5)

Thank you for your attention. I look forward to a PORE that fulfills its NPS mission and follows its founding legislation that mandates "the maximum protection, restoration, and preservation of the natural environment" (16 U.S.C. § 456c-6) on all its lands.

Thomas E. Kucera

#6599

Name: Dowling, Gary

Correspondence: I am writing to express my disappointment that ranching and dairy operations are allowed to continue in the National Park. This is inconsistent with the stated aims of the Park. Untreated manure entering the waterways is never a good situation especially in Tomales Bay with its shellfish related importance. All the ranching alternatives in the Draft Environmental Impact Statement involve the impairment of natural resources. Three National Park Service laws prohibit actions that will impair natural resources (the 1916 NPS Organic Act, Point Reyes National Seashore legislation Section 459c-6, and Golden Gate National Recreation Area legislation Section 460bb). Consequently, the Park Service should prepare a supplemental DEIS with ranching alternatives that comply with applicable laws requiring the protection of natural resources. The Park Service should then circulate that supplemental DEIS for public comment. Many Thanks, Gary Dowling

#6600

Name: Bahmanyar, Mir

Correspondence: Please support the elk and do not open up any areas for cattle ranchers.

#6601

Name: Lipscomb, Linda

Correspondence: Please do not allow the extension of leasing of public lands to cattle grazing, or other commercial agricultural pursuit. I also have heard that you are considering expanding the type of commercial farming activity, i.e., diversification of farming species, to occur on public lands at Point Reyes seashore. Instead, I urge you to adopt Alternative F of the proposals, phasing out ranching, and managing the land, water and wildlife.

The public has already paid for this land to be kept wild. Currently, the Park Service is permitting this public land, and the native species which originally inhabited it, to be despoiled and destroyed. This is a travesty, a disgrace, and is certainly outside the bounds of the legislation which is supposed to protect the land from exploitation. The Park Service is clearly in breach of the fiduciary duty it owes to the people of the US who paid for this wild land to be set apart from exploitation. And of course, it is an utter betrayal to allow the native species to suffer and die, or to be displaced, due to what may very well be illegal exploitation of this land by commercial agribusiness.

There is no saving grace to be had in falsely identifying these commercial "farms", which are despoiling both land and species, as historical and/or bucolic! You simply must stop this activity, and allow the land to be returned to the public as was intended and authorized under the law. Please adhere to your responsibility on this matter, and reverse current plans to expand these destructive practices! Do what you are charged to do under law! Very truly yours, Linda G. Lipscomb"

#6602

Name: Bailey, Kathy

Correspondence: Hi - Thank you trying to create an up to date management plan for Pt. Reyes National Seashore. However, you need to keep trying as the current plan in relation to livestock management will create negative impacts that cannot be mitigated, including significant water pollution and conflicts with native wildlife. The Amendment favors the cattle over the wildlife, which is not permissible under the terms of Pt. Reyes founding documents. There are other places the cows can be but Pt. Reyes is irreplaceable. Please go back to the drawing board and honor the founding documents of this national treasure. Best regards, Kathy Bailey

#6603

Name: N/A, N/A

Correspondence: I support Alternative F. My comment below.

-Under no circumstance shall the park kill any Tule Elk. -The park should prioritize Tule Elk habitat. -The park should refuse to grant 20-year permits and leases to cattle and dairy ranchers. Ranchers have overstayed their

original permit limits already. Long-term leases will set a terrible precedent in favor of private, commercial industry and jeopardize the future of our parks and the health of the ecosystem. -Absolutely no diversification of ranch operations. Any diversification (such as chicken coops, pigs, sheep, row crops, etc) will only serve to attract more predators like coyotes, foxes, bobcats that will be in conflict with ranch operations and have to be "managed" as well. -The park should revoke permits for all cattle and dairy operations and restore the leased land to its original, pre-industry state. The park should prioritize wildlife NOT commercial interests!

#6604

Name: BISHOP, MALCOLM

Correspondence: Stop the grazing on all public lands.

#6605

Name: Deldin, Lauren

Correspondence: As a resident of West Marin for 40 years and passionate hiker, I have to register my disagreement with the Sierra Club. I believe the family owned dairy farms and cattle ranches have been good stewards of this beautiful land. Don't put them out of business! Respectfully yours, Lauren Deldin

#6606

Name: Feldman, Andrea

Correspondence: I am writing to urge the National Park Service to discontinue the grazing of beef and dairy cattle at Point Reyes National Seashore. This precious area has been damaged by livestock grazing which poses a threat to the environment and local wildlife and it should be protected and used to serve the public good, and not for the benefit of the livestock industry.

I strongly oppose Option B and any other proposal that would be fatal to Tule Elk or other wildlife to the benefit of ranching operations, and encourage the agency to adopt Option F to discontinue grazing and allow members of the public to enjoy this beautiful park and to be enriched with opportunities to visit and appreciate this special place.

#6607

Name: DePasquale, Jean

Correspondence: I am writing to urge the National Park Service to discontinue the grazing of beef and dairy cattle at Point Reyes National Seashore. This precious area has been damaged by livestock grazing which poses a threat to the environment and local wildlife and it should be protected and used to serve the public good, and not for the benefit of the livestock industry.

I strongly oppose Option B and any other proposal that would be fatal to Tule Elk or other wildlife to the benefit of ranching operations, and encourage the agency to adopt Option F to discontinue grazing and allow members of the public to enjoy this beautiful park and to be enriched with opportunities to visit and appreciate this special place.

#6608

Name: Lorber , Jessica

Correspondence: Please protect the native wildlife in Point Reyes, including the Tule Elk, from being killed to promote cattle grazing.

#6609

Name: Reynolds, Jinesse

Correspondence: Thank you for the opportunity to make comments on DEIS (Draft Environmental Impact Statement) for a GMPA (General Management Plan Amendment) for the management of areas of PRNS (Pt Reyes NATIONAL Seashore) and the GGNRA (Golden Gate National RECREATION Area). There are three NPS laws that stand out that need to be recognized and enacted to prohibit actions that will impair the natural resources:

1. 1916 NPS Organic Act- Applies to all units of the NPS (National Park System), including PRNS and GGNRA. § 100101 The Secretary...shall promote and regulate the use of the NPS by means and measures that conform to the fundamental purpose of the System units, which purpose is to conserve the scenery, natural and historic objects, and wild life in the System units and to provide enjoyment of the scenery, natural and historic objects, and wild life in such a manner and by such means as will leave them UNIMPAIRED for the enjoyment of future generations. § 100101 (a). (Emphasis added.) With the respect to the Organic Act, the Ninth Circuit Court of Appeals has held that the language quoted above means 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).

2. §459c-6 Administration of property (a) Protection, restoration, and preservation of natural environment except as otherwise provided in sections 459c to 459c-7...the property...shall be administered by the Secretary without impairment of its natural values, in a manner which provides for such recreational, educational, historic preservation, interpretation, and scientific research opportunities as are consistent with ...the maximum protection, restoration, and preservation of the natural environment within the area...16 U.S.C. §459c-6 (Emphasis added.)

3. §460bb Establishment In order to preserve for public use and enjoyment certain areas of Marin and San Francisco Counties, California, possessing outstanding natural, historic, scenic, and recreational values, and in order to provide for the maintenance of needed recreational open space necessary to urban environment and planning, the Golden Gate National Recreation Area (hereinafter referred to as the "recreation area") is hereby established. In the management of the recreation area, the Secretary...shall utilize the resources in a manner which will provide for recreation and educational opportunities consistent with sound principles of land use planning and management. In carrying out the provisions of this subchapter, the Secretary shall preserve the recreation area, as far as possible, in its natural setting, and protect it from development and uses which would destroy the scenic beauty and natural character of the area. 16 U.S.C. § 460bb.

I urge the NPS to prepare a supplemental DEIS with ranching alternatives that comply with the applicable laws for public comment. The modifications must include practices that will regenerate and protect the water, soil, lands, and all wild life that the PRNS needs to be a healthy, resilient and vibrant National Park for all citizens and visitors to enjoy now and into the future.

#6610

Name: N/A, N/A

Correspondence: Please protect the elk.

#6611

Name: Ellis, Michelle

Correspondence: Please protect our wildlife. The cattle grazing is outdated, if ranchers want to continue they should continue on their own land and pay for their own food. They have no right to use these natural resources and threaten the elk.

#6612

Name: Salisbury, Amy

Correspondence: I am writing to urge the National Park Service to discontinue the grazing of beef and dairy cattle at Point Reyes National Seashore. This precious area has been damaged by livestock grazing which poses a threat to the environment and local wildlife and it should be protected and used to serve the public good, and not for the benefit of the livestock industry.

I strongly oppose Option B and any other proposal that would be fatal to Tule Elk or other wildlife to the benefit of ranching operations, and encourage the agency to adopt Option F to discontinue grazing and allow members of the public to enjoy this beautiful park and to be enriched with opportunities to visit and appreciate this special place.

#6613

Name: N/A, N/A

Correspondence: I am writing to urge the National Park Service to discontinue the grazing of beef and dairy cattle at Point Reyes National Seashore. This precious area has been damaged by livestock grazing which poses a threat to the environment and local wildlife and it should be protected and used to serve the public good, and not for the benefit of the livestock industry.

I strongly oppose Option B and any other proposal that would be fatal to Tule Elk or other wildlife to the benefit of ranching operations, and encourage the agency to adopt Option F to discontinue grazing and allow members of the public to enjoy this beautiful park and to be enriched with opportunities to visit and appreciate this special place.

#6614

Name: Collars, Rosanna

Correspondence: I am writing to urge the National Park Service to discontinue the grazing of beef and dairy cattle at Point Reyes National Seashore. This precious area has been damaged by livestock grazing which poses a threat to the environment and local wildlife and it should be protected and used to serve the public good, and not for the benefit of the livestock industry.

I strongly oppose Option B and any other proposal that would be fatal to Tule Elk or other wildlife to the benefit of ranching operations, and encourage the agency to adopt Option F to discontinue grazing and allow members of the public to enjoy this beautiful park and to be enriched with opportunities to visit and appreciate this special place.

#6615

Name: Baur, Gene

Correspondence: I am writing to urge the National Park Service to discontinue the grazing of domestic cattle at Point Reyes National Seashore. This is a beautiful and precious area that has been damaged by livestock grazing. Please allow the park to be used for the public good by protecting the environment and wildlife. This natural resource should not be exploited to benefit the livestock industry.

I strongly oppose Option B or any other proposal that harms Tule Elk or other wildlife, and encourage the agency to adopt Option F to discontinue grazing and allow members of the public to enjoy this beautiful park and to be enriched with opportunities to visit and appreciate this special place.

#6616

Name: N/A, N/A

Correspondence: Please do not renew these contracts and allow the Elk to thrive.

#6617

Name: Strate, Gretchen

Correspondence: I am writing to urge the National Park Service to discontinue the grazing of beef and dairy cattle at Point Reyes National Seashore. This precious area has been damaged by livestock grazing which poses a threat to the environment and local wildlife and it should be protected and used to serve the public good, and not for the benefit of the livestock industry.

I strongly oppose Option B and any other proposal that would be fatal to Tule Elk or other wildlife to the benefit of ranching operations, and encourage the agency to adopt Option F to discontinue grazing and allow members of the public to enjoy this beautiful park and to be enriched with opportunities to visit and appreciate this special place.

#6618

Name: Butschek , Monica

Correspondence: I support option F - discontinue allowing private cattle ranchers to graze on public lands.

I do not support option B - Do not kill the elk or ANY animals in order to allow the cattle to graze.

#6619

Name: Maldonado , April

Correspondence: Please protect wildlife, especially the elk

#6620

Name: HERTZER, Anna-Maria

Correspondence: Oops! Did I hit send before I was ready? The Shame of Point Reyes. Too many cows. Too few elk. Remove the cows. Do not kill the elk. Disgusting to see how the cattle ranchers/farmers are treating their cows and the calves. And the cows are destroying the habitat. Shame on you, Point Reyes National Seashore directors.

#6621

Name: Carolan, Kate

Correspondence: I guess I would "vote" for B, with these reservations: No diversification: we don't want the park to be overrun with farm stands, wineries ,tasting rooms for anything, stores or any commercial-open-to-the-public retail businesses. Especially pigs and chickens. There are enough chickens already and that is not what the park is for. I understand that there are already established chicken operations and I would not want them expanded onPark land. Farm produced products can be sold outside the park. (The Inverness store) Also farmers get government subsidies. Bad years should be compensated with that. Once diversification starts it will be very difficult to manage with the already understaffed staff. Elk Management: I suggest managing to the threshold impact of 120 elk rather than the number of 120 elk. Cull as last resort. Mitigation's: mandatory not aspirational within reasonable time frame, then enforced by the park, Public should be able to track the progress of mitigation process by transparency from the park. Succession: The 6 historic ranches leases extending only to immediate family until the family either dies off or loses interest in ranching. Ranch workers can take over the ranch until their death and then no more. Closed ranches should remain closed, and if possible be brought back to natural habitat or educational resources. Do not offer abandoned ranches to other ranchers for ranching, Let said

properties go back to nature. This will prevent the park from becoming Pt Reyes National Chicken farms. I understand the park must be true to the original leases and congressional intentions but I do not think extending leases to non historic ranch operators is a good idea as it will encourage more ranching in the park. The 6 historic ranches should be enough to honor the historic ranching. Current ranchers on non historic ranches should be granted lifetime occupancy unless they don't live on the ranch. Let the ranch lessors naturally die off and give the land back to the park/nature for other uses. This will avoid another "oyster" war. the community has had enough! Lease Template: Park should be transparent to the public and enforce leases and continually make sure of lease compliance. Public use and enjoyment: Please don't allow e bikes and take bikes off trails as much as possible ,ok for existing ranch roads, but no additions. Make bells mandatory! Thank you for your time and consideration of my proposals. And good luck!

#6622

Name: Vieira, Alfred

Correspondence: The notions that Tule Elk are significantly impinging on ranching operations, and that ranchers need expanded access to grazing land in Point Reyes National Seashore would be laughable if they weren't infuriating to those of us who value the preservation of this uniquely beautiful and critical habitat and watershed. My wife and I have been visiting this area for many years, and and have travelled all its byways. I know the Inveness Ridge and its surrounding lands like the backs of my hands - ridge and rock, root and bough, stream and slough. And I can tell you that if anybody's grazing (and watering!) rights are being impinged, it's the Tule Elk's, not the ranchers. Granted there are many miles of fencing to maintain. But we see evidence everywhere of cattle getting off their owners' properties, knocking down fences, and fouling natural ponds - in some cases all the way down to the shoreline beaches. Wherever we go, we see cattle, and their effects on the land. What we almost \*never\* see, despite years of wandering on foot throughout the area, are Tule Elk. They're such a rare and welcome sight that when we come across them it truly makes our day and gives us some confidence that all is well with the world. Please, \*please\*, !!PLEASE!! don't prioritize ranching at the expense of these magnificent animals. Efforts would be far better spent instead on making sure ranchers keep their herds on their own lands, maintain adequate fencing, and keep their cattle outside of sensitive areas. There is precious little land left for the Tule Elk to survive on.

#6623

Name: Senatore , Scarlett

Correspondence: I am writing to urge the National Park Service to discontinue the grazing of beef and dairy cattle at Point Reyes National Seashore. This precious area has been damaged by livestock grazing which poses a threat to the environment and local wildlife and it should be protected and used to serve the public good, and not for the benefit of the livestock industry.

I strongly oppose Option B and any other proposal that would be fatal to Tule Elk or other wildlife to the benefit of ranching operations, and encourage the agency to adopt Option F to discontinue grazing and allow members of the public to enjoy this beautiful park and to be enriched with opportunities to visit and appreciate this special place.

#6624

Name: N/A, N/A

Correspondence: I am writing to urge the National Park Service to discontinue the grazing of beef and dairy cattle at Point Reyes National Seashore. This precious area has been damaged by livestock grazing which poses a threat to the environment and local wildlife and it should be protected and used to serve the public good, and not for the benefit of the livestock industry.

I strongly oppose Option B and any other proposal that would be fatal to Tule Elk or other wildlife to the benefit of ranching operations, and encourage the agency to adopt Option F to discontinue grazing and allow members of



the public to enjoy this beautiful park and to be enriched with opportunities to visit and appreciate this special place.

#6625

Name: Maximova , Maria

Correspondence: In the light of the climate crisis we are all facing, I al writing to you to urge the National Park Service to discontinue the grazing of beef and dairy cattle at Point Reyes National Seashore. This precious area has been damaged by livestock grazing which poses a threat to the environment and local wildlife and it should be protected and used to serve the public good, and not for the benefit of the livestock industry.

I strongly oppose Option B and any other proposal that would be fatal to Tule Elk or other wildlife to the benefit of ranching operations, and encourage the agency to adopt Option F to discontinue grazing and allow members of the public to enjoy this beautiful park and to be enriched with opportunities to visit and appreciate this special place.

Looking forward to hearing from you and truly hoping on your sense of urgency and cooperation.

Regards, Maria

#6626

Name: Arsenault, Penny

Correspondence: How long will people's appetite for meat continue to accelerate the downward spiral of the planet and it's diverse species. Let's stop it now. Let's start with this native elk.

#6627

Name: Orgel, Vivienne

Correspondence: I am opposed to allowing ranching or other commercial or intrusive activities on our public lands such as the Point Reyes area. I love visiting there and seeing wild animals, birds and beautiful scenery. This is important for all the bay area regions children and families. Sincerely, Vivienne Orgel, MSW.

#6628

Name: N/A, N/A

Correspondence: I am writing to urge the National Park Service to discontinue the grazing of beef and dairy cattle at Point Reyes National Seashore. This precious area has been damaged by livestock grazing which poses a threat to the environment and local wildlife and it should be protected and used to serve the public good, and not for the benefit of the livestock industry.

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#6629

Name: Crownfield, Heea

Correspondence: I am writing to urge the National Park Service to discontinue the grazing of beef and dairy cattle at Point Reyes National Seashore. This precious area has been damaged by livestock grazing which poses a threat

to the environment and local wildlife and it should be protected and used to serve the public good, and not for the benefit of the livestock industry.

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#6630

Name: N/A, N/A

Correspondence: I am writing to urge the National Park Service to discontinue the grazing of beef and dairy cattle at Point Reyes National Seashore. This precious area has been damaged by livestock grazing which poses a threat to the environment and local wildlife and it should be protected and used to serve the public good, and not for the benefit of the livestock industry.

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#6631

Name: Steele , Lisa

Correspondence: I am writing to urge the National Park Service to discontinue the grazing of beef and dairy cattle at Point Reyes National Seashore. This precious area has been damaged by livestock grazing which poses a threat to the environment and local wildlife and it should be protected and used to serve the public good, and not for the benefit of the livestock industry.

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Lisa Steele

#6632

Name: Welsford , Susan

Correspondence: I care about protecting California's wildlife. I oppose the National Park Service's plan to kill native tule elk and expand commercial agriculture in Point Reyes National Seashore and Golden Gate National Recreation Area. I urge the National Park Service to instead restore the lands for wild animal habitat.

Our preservation of our public lands and wildlife is NOT for the economic interests of private ranchers. These commercial cattle ranches have serious negative environmental impacts on the park - polluting waterways, causing soil erosion, and harming the many endangered and threatened animals who live on Point Reyes.

National parks exist to protect our natural resources and native wildlife. This park should be managed accordingly.

#6633

Name: Figarotta , Jennifer

Correspondence: I am writing to urge the National Park Service to discontinue the grazing of beef and dairy cattle at Point Reyes National Seashore. This precious area has been damaged by livestock grazing which poses a threat to the environment and local wildlife and it should be protected and used to serve the public good, and not for the benefit of the livestock industry.

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#6634

Name: N/A, N/A

Correspondence: These beautiful elk have families-children, mothers, and fathers- just like us humans do. They shouldn't have to have permission to live on this earth. This earth needs them and is here for sentient beings like themselves; they were here long before all of us humans were. Please, we are begging you, to choose COMPASSION OVER CRUELTY. Humans have the choice to protect those that share this earth with us, and by not doing so, you are killing the one and only earth we have. And right now you have a choice to be a kind human being or not. Animals are NOT here for us. They are here WITH us. Stand up and protect them.

#6635

Name: Rao, Sheetal

Correspondence: I am writing to urge the National Park Service to discontinue the grazing of beef and dairy cattle at Point Reyes National Seashore. This precious area has been damaged by livestock grazing which poses a threat to the environment and local wildlife and it should be protected and used to serve the public good, and not for the benefit of the livestock industry.

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#6636

Name: McCarley, Heather

Correspondence: I am writing to urge the National Park Service to discontinue the grazing of beef and dairy cattle at Point Reyes National Seashore. This precious area has been damaged by livestock grazing which poses a threat to the environment and local wildlife and it should be protected and used to serve the public good, and not for the benefit of the livestock industry.

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#6637

Name: Cheske, Judith

Correspondence: I am writing to urge the National Park Service to discontinue the grazing of beef and dairy cattle at Point Reyes National Seashore. This precious area has been damaged by livestock grazing which poses a threat to the environment and local wildlife and it should be protected and used to serve the public good, and not for the benefit of the livestock industry.

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#6638

Name: Tomasic, Kathy

Correspondence: Keep dairy farmers out of Pt. Reyes park and stop destroying our natural habitats for ranching and farming. This is insane. Start acting like a Park Service and not a Farming Service.

#6639

Name: Murphy, Erin

Correspondence: I am writing to urge the National Park Service to discontinue the grazing of beef and dairy cattle at Point Reyes National Seashore. This precious area has been damaged by livestock grazing which poses a threat to the environment and local wildlife and it should be protected and used to serve the public good, and not for the benefit of the livestock industry.

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#6640

Name: Lofroos, Catharine J. Kit

Correspondence: I'm writing to support public access and bicycling improvements outlined under Alternatives B, C, D, E, and F. I strongly support proposals that would lead to the planning and implementation of bicycling routes on trails, ranch roads, and pathways throughout the planning area, including but not limited to: 1) a connection between Devil's Gulch and Platform Bridge Road using existing ranch roads, 2) a connection between Bolinas Ridge Trail at Olema Hill and Point Reyes Station to serve as an interim connection for the Cross Marin Trail, 3) a connection between Bolinas Ridge Trail and Five Brooks Stables using existing ranch roads 4) a connection between Drakes Estero and Abbotts Lagoon Trail using existing ranch roads, 5) a connection between Marshall Beach Trailhead and Pierce Point Road using existing ranch roads, and 6) an Estero Trail loop using existing ranch roads. I encourage NPS to collaborate with ranchers and other stakeholders to educate the public and address concerns related to public access on working ranch lands.

The improvements outlined above would enable and encourage me to visit the Seashore more regularly- and by bike, rather than car. I would feel much safer riding in the Seashore and surrounding areas on trails, pathways, and ranch roads, rather than on roads shared with fast-moving vehicular traffic and/or hesitant tourists who may be unfamiliar with roadways and turn-offs.

Bicycling opportunities are currently very limited and fragmented, so any improvements in connectivity and the creation of new loop options would enable me to enjoy more of the Seashore and surrounding areas by bike.

#6641

Name: Katrn, Susan

Correspondence: Stop the madness leave animals alone

#6642

Name: Hamilton, Hayden

Correspondence: I am writing to urge the National Park Service to discontinue the grazing of beef and dairy cattle at Point Reyes National Seashore. This precious area has been damaged by livestock grazing which poses a threat to the environment and local wildlife and it should be protected and used to serve the public good, and not for the benefit of the livestock industry.

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#6643

Name: Johnson, Cheri

Correspondence: To Whom it May Concern:

I am writing to urge the National Park Service to discontinue the grazing of beef and dairy cattle at Point Reyes National Seashore. This precious area has been damaged by livestock grazing which poses a threat to the environment and local wildlife and it should be protected and used to serve the public good, and not for the benefit of the livestock industry.

I strongly oppose Option B and any other proposal that would be fatal to Tule Elk or other wildlife to the benefit of ranching operations, and encourage the agency to adopt Option F to discontinue grazing and allow members of the public to enjoy this beautiful park and to be enriched with opportunities to visit and appreciate this special place.

#6644

Name: Savage, Charles

Correspondence: I have been visiting the Point Reyes National Seashore (Seashore) since 1970 when I was a student at the University of California, Berkeley and am quite familiar with the park lands commonly referred to as the Pastoral Zone. Currently, the Ranch Lands and Dairy Farms in the Planning Area have been severely degraded after years of excessive grazing and trampling by cattle. In addition, the National Park Service (NPS) has allowed infrastructure to significantly deteriorate so that visitors today are confronted with severely degraded road ways including a section of Sir Francis Drake Blvd that is submerged under water near the former Oyster Farm, and road closures for Mt Vision and the McClure's Beach parking area. The road to the Chimney Rock parking area has deteriorated to the point of being one lane only for a steady stream of visitors. The Park Service notes that repairs to Sir Francis Drake Blvd and the road to Pierce Point Ranch are scheduled for 2020 without recognizing that heavy farming equipment and semi tractor trailers supporting the ranches and dairy farms played a significant role in degrading the roadways. No provision has been made in the EIS under the preferred Alternate B for ranchers and dairy farms to maintain the roads that their equipment degrade. Visitors to the Seashore are still met with miles of barbed wire fencing that effectively prevent access to some of the most scenic areas of the Park. Little has been done to provide additional parking areas, expand hiking and biking trails and to replace foul smelling latrines for the nearly 2.5 million annual visitors. Parking remains severely limited for access to the Lighthouse, Chimney Rock, Kehoe Beach, McClure's Beach and Pierce Point Ranch.

Roadways through Historic Ranches A, B and J have been severely degraded by heavy farm equipment and are fouled with manure. Those historic ranches are in a state of chronic disrepair and their occupants demonstrate a total lack of regard for maintaining their properties under the privileged status as Historic Ranches.

It has been quite obvious over the past 50 years that the NPS has given preference to the the Ranches and Dairy Farms with minimal attention to improving the Visitor Use, Experience and Access for the taxpaying public who fund the Seashore as well as for the international visitors. In choosing Alternative B in the draft EIS, the NPS

perpetuates the false assumption that visitors will continue to enjoy the Park in spite of potential conflicts with Ranches and Dairy Farms in the limited space of the Planning Area.

Deficiencies in the Assumptions made by the NPS in the draft EIS.

1. A survey conducted in 2005 indicated that 100% of the visitors to the Park were satisfied overall with appropriate facilities, services and recreational opportunities. (University of Idaho Cooperative Parks Studies Unit 2005.) It is uncertain if this survey was conducted only of visitors at the Bear Valley Visitor Center and what if any questions were asked regarding the current Planning Area. It is unknown for example if visitors were asked in 2005 if they preferred the presence of cows or Tule Elk, miles of barbed wire fences blocking access, damaged road ways, limited parking, foul smelling latrines, concentrated manure storage and the spreading of liquid manure on the Pasture subzone. One would have a very different impression of the Seashore if they only visited areas south of Limantour Road and outside of the Planning Area. Undercutting the rosy 2005 assessment the NPS did note that "Ranching operations can also diminish the visitor experience. For instance, visitors have encountered cattle on trails and roadways in the Park, and visitors have noted concerns regarding electric fencing, interactions with cattle and manure management (NPS 2014a)." In the fall, the Dairy Farms will spread foul smelling liquid manure in the pasture subzone further diminishing the visitors' experience. A general survey conducted in 2005 should not take the place of a more detailed survey that should have been conducted in 2018 of visitors to the Planning Area. The NPS simply assumes that visitors to the Seashore will still enjoy the scenic quality of the Planning Area landscape while traveling along roadways lined with barbed wire and limited access to park lands without any supporting documentation. Like cattle, visitors to Abbotts Lagoon leave a fenced parking area and are herded along a barbed wire fenced trail to the coast. The fencing leaves no doubt that visitors are not welcome on ranch lands in the Pastoral Zone. The NPS assumes that the visitors' experience will be diminished if they are unable to "experience the role of coastal prairie ranching in California" without any documentation that visitors would like to walk through concentrated manure into foul smelling milking barns or to take a close look at calves crammed into white plastic pens. Fencing and cattle operations currently crowd the roadway at Historic Ranches A,B and J and there is no room for visitor parking. Rather than creating additional parking at Ranch A for access to the Lighthouse for whale watching, visitors are required to take shuttle buses for a long uncomfortable ride from Beach parking lots. If 70 parking spaces are removed as planned from the Drakes Beach parking area, it will further aggravate limited parking access. Ranchers have shown no interest in creating parking or access to their expansive holdings and Ranch J has even posted a warning against "Unauthorized Visitors."

Significantly, the NPS has not even conducted a survey asking visitors if they would prefer viewing a larger herd of Tule Elk than the proposed 120 Tule Elk in the Drakes Bay herd. Given the large numbers of visitors who go to the Historic Pierce Ranch to view Elk, it should be obvious that visitors to the park would prefer viewing Elk rather than large concentrations of livestock.

## 2. Assumptions Regarding Tourism and Travel

The National Park Service Visitor Spending Effects Report shows that almost 2.5 million people visited Point Reyes for recreation in 2017. These visitors spent \$108.5 million in gateway communities. This spending supported 1,244 jobs with an aggregate benefit to the local economy of \$132.4 million. The NPS notes that the number of visitors to Point Reyes in 2017 increased by 1%. (NPS 2016h)

In spite of this finding and in spite of a promise under Alternative B to enhance public use and enjoyment, the Park Service concludes without any supporting documentation that "annual visitation is not expected to change and approximately 2 to 2.5 million visitors are expected to continue to visit the Park each year." It is unreasonable to conclude that even after taking steps to enhance public use and enjoyment, the number of visitors would remain constant over the next 20 years given that the Seashore is located within 40 miles of the San Francisco metropolitan area. Population in the San Francisco area and tourism are expected to increase in the coming decades. Interest in outdoor recreation and visiting National Parks are also expected to increase. If the Park

Service as planned opens up roadway and trail across ranch lands for cyclists, hikers and horseback riders as well as overnight camping areas, visitor use would be expected to grow.

The Park Service concludes after an analysis of Environmental Consequences that Alternative B would "contribute noticeable beneficial impacts by providing a wider range of recreational and educational opportunities in the planning area...Overall visitor use and experience would improve compared to existing conditions." However, later under an analysis of Socioeconomics, the Park Service concludes that "While alternative B could create new recreational opportunities over the long term, the overall visitation to the park is expected to remain similar to the last decade" This assumption is clearly inconsistent with the previous conclusion that visitor use and experience would improve.

Instead, the Park Service should anticipate that increased visitor use will require freeing up more land currently occupied by ranches and dairy farms in the Planning Area. The assumption that no growth in visitation would thereby allow the Ranches and Farms to continue operations with 2,400 units of beef cattle and 3,130 dairy animals plus additional "diversification activities" is unrealistic and is not supported by any current studies.

### 3. Assumption that funding will be available to implement Alternative B

Unfortunately, if past performance is an indication of future actions, the Park Service is unlikely to accomplish many of its stated goals with one major exception: The NPS will issue lease/permits with up to 20 year terms to the existing 24 ranch families to continue beef and dairy operations on approximately 26,100 acres. These authorizations would be similar to existing lease/permits with approximately 2,400 beef cattle and 3,130 dairy animals. Additional diversification activities would be authorized in specific subzones. The NPS would require no additional funding from the Ranches and Dairy Farms to maintain this status quo of business as usual. The Ranches and Dairy Farms would continue to pay an adjusted fair market value rent to the NPS that takes into account the regulations required to operate within the Planning area with no requirement that they pay for damage to park lands and roads. Modest amounts required to be set aside to maintain historic structures will be insufficient. Ranchers have not even been able to give their buildings a fresh coat of paint and will undoubtedly look to NPS to maintain the structural integrity of the Historic Buildings.

Significantly, the NPS provides no financial projections for the cost of implementing actions "to enhance public use and enjoyment." Currently, it has taken nearly a year to repair the Lighthouse which remains closed to the public. The McClures Beach trailhead access road and parking lot and the access road to Mt Vision remain closed "until further notice" and repairs to Sir Francis Drake Blvd and the road to the Pierce Ranch will not commence until 2020. Visitor access to the Seashore will be restricted during these repairs while ranches will continue to have road access to maintain their operations.

No dates have been projected by the NPS as to when any actions will be taken to enhance visitor use, experience and access. As noted earlier, little has been done in the past 50 years to improve conditions for visitors and without an adequate source of funding, it is unlikely that any significant changes will take place. In the meantime however, demand for public access and use of the Point Reyes National Seashore will only increase and the NPS cannot simply assume that it will not. Protecting Ranchers and Dairy Farms with 20 year leases and fencing out the taxpaying public who will continue to fund the Seashore is not an acceptable option.

### Conclusion

The NPS assumption in the EIS that an improvement of visitor use and experience in the Seashore will not result in an increase of the number of visitors is unrealistic and unsupported by any current study. The NPS needs to address this deficiency and conduct the necessary studies to accurately project an increase in the number of visitors. Further, financial projections should be included in the EIS and the likelihood of obtaining funding should be ascertained. Simply assuming that the necessary funding will be available will not cure existing limitations in funding for National Parks. Promises made by the NPS to the tax paying public in the EIS are pointless if they cannot be carried out.

#6645

Name: Pinsky, Elizabeth

Correspondence: I am writing to urge the National Park Service to discontinue the grazing of beef and dairy cattle at Point Reyes National Seashore. This precious area has been damaged by livestock grazing which poses a threat to the environment and local wildlife and it should be protected and used to serve the public good, and not for the benefit of the livestock industry.

I strongly oppose Option B and any other proposal that would be fatal to Tule Elk or other wildlife to the benefit of ranching operations, and encourage the agency to adopt Option F to discontinue grazing and allow members of the public to enjoy this beautiful park and to be enriched with opportunities to visit and appreciate this special place.

#6646

Name: Markwr, Tiffany

Correspondence: Please do not extend the rancher leases at Point Reyes National Seashore in Marin County, CA. Cattle should not be allowed to graze in the public park, because it poses a threat to the environment, wildlife, and the public good.

The National Park Service proposals that include killing the native Tule elk in order to continue grazing livestock are detrimental to the natural environment. The elk should be allowed to live in their natural habitat without fear of being killed to support a for profit industry.

#6647

Name: Gomes, Julie

Correspondence: The meat industry is one of the biggest threats to our environment. The natural Tule Elk should be allowed to live and graze in this area.

#6648

Name: Metcalf, Lenice

Correspondence: I want the park service to adopt Alternative F and phase out all ranching, as it was originally intended. The seashore should be managed for the natural values it was created to preserve- its land, water and wildlife like the beautiful Tule Elk. Please protect wildlife over livestock. The Tule Elk only eat 9 lbs grass per animal as opposed to 50 lbs per cow. The impact of the tons of manure from the cattle ranching is polluting the creeks, bays, and the ocean. The ranchers are also very cruel to the female cows especially, who have their calves taken from them and the calves are brought to a place where they are kept imprisoned alone in 1 tent and not allowed to roam or have contact with their mother again, before they are sold and slaughtered. The park service should restore the pastoral zone for wildlife habitat, native plant communities, scientific research and education. The park should not be used for raising cows, hogs, chickens, turkeys, sheep and goats or building Air b and bs on it. The historic ranch building should be repurposed for historic research, interpretation and education, and the park service should not have a plan to kill the Tule Elk. The Tule Elk must be allowed to roam free, not be kept fenced in from the places where they can have water to drink. So many of the Tule Elk have slowly died of thirst already or had their antlers entangled in the ranchers horrible wire fences. These magnificent creatures are what people from all over the world come to see. The Park service should let Point Reyes be wild and beautiful and clean again and please adopt Alternative F.

#6649

Name: N/A, N/A

Correspondence: I am writing to urge the National Park Service to discontinue the grazing of beef and dairy cattle



at Point Reyes National Seashore. This precious area has been damaged by livestock grazing which poses a threat to the environment and local wildlife and it should be protected and used to serve the public good, and not for the benefit of the livestock industry.

I strongly oppose Option B and any other proposal that would be fatal to Tule Elk or other wildlife to the benefit of ranching operations, and encourage the agency to adopt Option F to discontinue grazing and allow members of the public to enjoy this beautiful park and to be enriched with opportunities to visit and appreciate this special place.

#6650

Name: Mitchell, Ellen

Correspondence: I am writing to urge the National Park Service to discontinue the grazing of beef and dairy cattle at Point Reyes National Seashore. This precious area has been damaged by livestock grazing which poses a threat to the environment and local wildlife and it should be protected and used to serve the public good, and not for the benefit of the livestock industry.

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#6651

Name: Beckstead, Scott

Correspondence: Killing elk to accommodate public lands livestock grazing is a blatant violation of the public trust doctrine. Wildlife are here to benefit us ALL, and the vast majority of us who cherish wildlife for its own sake - not as targets, trophies, or sport - want the CATTLE gone, NOT the elk!

Stop kowtowing to entitled welfare ranchers. Get them and their livestock off our public lands. Let the elk and other wildlife flourish.

Thank you for considering my views.

#6652

Name: N/A, N/A

Correspondence: I am writing to urge the National Park Service to discontinue the grazing of beef and dairy cattle at Point Reyes National Seashore. This precious area has been damaged by livestock grazing which poses a threat to the environment and local wildlife and it should be protected and used to serve the public good, and not for the benefit of the livestock industry.

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#6653

Name: N/A, N/A

Correspondence: It's time to focus on the big picture rather than appease cattle ranchers; the world and our children depend on us thinking past our stomachs.

#6654

Name: N/A, N/A

Correspondence: I am writing to urge the National Park Service to discontinue the grazing of beef and dairy cattle at Point Reyes National Seashore. This precious area has been damaged by livestock grazing which poses a threat to the environment and local wildlife and it should be protected and used to serve the public good, and not for the benefit of the livestock industry.

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#6655

Name: Karim, Sanjana

Correspondence: I am writing to urge the National Park Service to discontinue the grazing of beef and dairy cattle at Point Reyes National Seashore. This precious area has been damaged by livestock grazing which poses a threat to the environment and local wildlife and it should be protected and used to serve the public good, and not for the benefit of the livestock industry.

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#6656

Name: N/A, N/A

Correspondence: I support Alternative F, phasing out cattle and dairy industry and returning the land to its natural state. The enabling legislation of the National Seashore supports wildlife protection and does not mention upholding private industry. The original leases to ranchers were to be 25 years. Ranchers have already been paid handsomely for their land, so it is long overdue to phase out the ranches. "Cultural Resource" and "Historic" does not mean industry needs to be currently in operation. Private business has no place on public land. Allowing industry and ranches to diversify their business is a bad idea. Already these ranches have been negatively impacting the land, mismanaged to allow soil erosion, scarring in the landscape, e.coli contamination in waterways and more. If you allow EVEN MORE agricultural practices on the seashore, there is no way to know the impact and there is no historical evidence you will be able to manage any negative impacts on the environment. Tule Elk should be protected for the survival of their species. They have already gone through a huge genetic bottle neck when they were almost completely wiped out except for 20 individuals. Every gene allele is important for the long term sustainability of the herd. The National Park should be protecting all Tule Elk, and allowing new herds to form and to TAKE DOWN THE FENCE at Pierce Point and allow all Tule Elk to roam free. I do not support granting 20 year leases to cattle and dairy industry. Climate science has indicated we have less than 12 years to mitigate the worst of climate catastrophe. Allowing business that has been linked to water pollution, species extinction and in Point Reyes is the culprit of over 60% of the greenhouse gas emissions, it is not a good idea to give that same industry a 20-year lease to continue degrading our national park. Point Reyes is a refuge to thousands of plants and animals. Point Reyes can be a leader in the fight for climate justice, and it starts with phasing out Beef and Dairy operations and restoring the land to its natural state. The EIS has NO MENTION of the effects of climate change in it, and does not include any information of the cattle and dairy's impact on climate change within the park.

#6657

Name: Elsen, Patricia

Correspondence: National Parks are lands set aside for the protection of that land and those animals. Not for the cattle industry. Stop allowing grazing of cattle!!! This is PUBLIC land.

#6658

Name: Counts, Bryan

Correspondence: I come to the Seashore because I want see the wildlife, and a healthy ecosystem. I would like for future generations of people to be able do the same.

There should be Prioritizing of biodiversity by phasing out of cattle and the removal of domestic livestock in the park. Wildlife should NOT BE KILLED to accommodate commercial interests. So called "historic" ranch buildings should be purposed for scientific research which have a positive impact for the planet and humanity. Lets think of the future and making the word a better place for humans and the native landscapes (of which are being destroyed with little regard) and of the endangered species which lack the a voice to stand up for themselves.

The idea that Tule Elk are even considered for lethal removal on public land is absolutely pathetic and a shameful. This is a bullhead response that prioritize environmental degradation for profit seeking over protecting the native animals and landscapes. The Park's decision to hand over our public land to the ranchers with complete disregard for wildlife protection is completely irresponsible.

Ranching is unsustainable. Ranching should be phased out. There should be no livestock in the park, especially at the expense of Tule Elk. Alternative F is the only right this to do. In 2016, the NPS disclosed that 250 confined elk had perished during the drought. These elk were fenced off from pasture and water the NPS leases for cattle grazing. The majority of the elk remain confined at Tomales Point. Shameful.

Cattle are the leading source of greenhouse gases at the Seashore. Methane, produced by cattle, is a greenhouse gas 25x-100x worse than carbon dioxide. There is no discussion of mitigation for cattles impacts to the climate in any of the NPSs ranching alternatives.

There is well-documented damage to grasslands, birds, native plants and wildlife; the pollution affecting freshwater and and marine habitats; and methane and other greenhouse gas emissions that contribute to the climate crisis. Manure runoff polluting the only marine wilderness south of Alaska is not sustainable. Illegally disposing of cattle carcasses around the national seashore is not sustainable. Allowing cattle to give elk and other wildlife life-threatening diseases is not sustainable. Subsidizing and endorsing methane-producing confined animal feeding operations (CAFOs) in an era of climate change is not sustainable. Trucking hay for hundreds of miles as a supplemental feed, because pastures are overstocked and overgrazed, is not sustainable. And yet these practices continue...

From the Point Reyes park service home page (<https://www.nps.gov/pore/index.htm>) "A Natural Sanctuary, A Human Haven" - This should currently be rewrote to say "Cattle Haven - Where we propose KILLING THE NATIVE TURLE ELK NAD ENCOURAGING ENVEROMENTAL DEGRADIATION TO PROTECT THE PROFITS OF RANCHERS".

From the Point Reyes park service page (<https://www.nps.gov/pore/learn/nature/index.htm>) I quote: "As wildland habitat is lost elsewhere in California, the relevance of the Point Reyes Peninsula increases as a protected area with a notable rich biological diversity. Over 45% of North American avian species and nearly 18% of California's plant species are found in the park due to the variety of habitat and uniqueness of the geology. Thirty-eight threatened and endangered species exist within the Seashore."

After reading this, then reading the NPS Preferred Alternative which would allow 20 more years of ranching and permitting 3,130 dairy animals under alt B, the preferred alternative... and ONLY protecting 120 adult elk is

absolutely ridiculous, insane, and several other choice words. Please re-read the quoted paragraph above taken from the Point Reyes park service page. That is a 24 cattle to every 1 native elk, and the Park service has the gall to put forth a proposal such as this. "Thirty-eight threatened and endangered species exist within the Seashore." but but NPS proposes extending cattle ranching operations for 20 years. Alternative B: NPSs preferred alternative is shockingly an anti-wildlife plan.

I reject the notion and assertion that ranching here is historic and the current operations should be protected. I propose that the native landscape and species hold a higher historic value, these SHOULD be protected. So called "historic" ranch buildings should be purposed for scientific research which have a positive impact for the planet.

To Summarize: -Yes on Alternative F - NO on NPSs preferred alternative, Alternative B -I come to the Seashore because I want see the wildlife. -Under NO circumstance the killing any Tule Elk. -NO 20-year permits and/or leases to cattle and dairy ranchers. -NO diversification for ranches which will only serve to attract more predators like coyotes, foxes, bobcats that will be in conflict with ranch operations and have to be "managed" as well. - Revoke permits for all cattle and dairy operations and restore the leased land to its original, pre-industry state. - The park should update their education and visuals throughout the park to reflect their mission- wildlife preservation. -Removal of fence at the Pierce Point Elk Reserve to be so a migration corridor can be created for that Tule Elk herd. - "Historic" ranch buildings should be purposed for scientific research.

#6659

Name: Goetz, Laura

Correspondence: I am writing to urge the National Park Service to discontinue the grazing of beef and dairy cattle at Point Reyes National Seashore. This precious area has been damaged by livestock grazing which poses a threat to the environment and local wildlife and it should be protected and used to serve the public good, and not for the benefit of the livestock industry.

I strongly oppose Option B and any other proposal that would be fatal to Tule Elk or other wildlife to the benefit of ranching operations, and encourage the agency to adopt Option F to discontinue grazing and allow members of the public to enjoy this beautiful park and to be enriched with opportunities to visit and appreciate this special place.

#6660

Name: Jarocki, Martha

Correspondence: Diversification: The impacts of diversification have not been addresses or analyzed, such as increased commercial traffic and affects on local infrastructure and park roads, conflicts with depredation of ranch animals by native species, and damage to the historic value of the Seashore as pastures are changed to new uses. The impacts on native plant species of diversification are insufficiently addressed in the management plan. Diversification should not be considered in order to make the ranches more commercially profitable. Profitability of the ranching is not an appropriate goal for the Seashore.

Boat in camping in Drake's Estero: this concept should not be considered in the Estero, which is a rare and undisturbed marine wilderness. The park should remove all consideration of camping by boat and otherwise in the Estero.

Elk: Destroying native Tule Elk or removing significant populations of elk in the Seashore is unacceptable and incompatible with the goals of the Seashore and with the public interest and should not be considered. Management of the elk populations should be for the purpose of managing natural resources within the Seashore and not for the benefit of commercial lease holders.

#6661

Name: Ratliff, Traci

Correspondence: am writing to urge the National Park Service to discontinue the grazing of beef and dairy cattle at Point Reyes National Seashore. This precious area has been damaged by livestock grazing which poses a threat to the environment and local wildlife and it should be protected and used to serve the public good, and not for the benefit of the livestock industry.

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#6662

Name: peterson, darla

Correspondence: Please, please, PLEASE do not renew the rancher's lease!!

#6663

Name: Ratliff, Terry

Correspondence: I am writing to urge the National Park Service to discontinue the grazing of beef and dairy cattle at Point Reyes National Seashore. This precious area has been damaged by livestock grazing which poses a threat to the environment and local wildlife and it should be protected and used to serve the public good, and not for the benefit of the livestock industry.

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#6664

Name: Bustraan, Marcy

Correspondence: Protect the animals, don't kill them!!

#6665

Name: Verheul, Jacob

Correspondence: Please respect the rights of animals!!!

#6666

Name: N/A, N/A

Correspondence: We are lifetime members of the Sierra Club and we support Alternative B

#6667

Name: Isadore, Megan

Correspondence: September 23, 2019

Cicely Muldoon, Superintendent Point Reyes National Seashore 1 Bear Valley Road Point Reyes, CA 94956

RE:

Dear Superintendent Muldoon,

Thank you for the opportunity to submit comments on the Draft Environmental Impact Statement (DEIS) for a General Management Plan Amendment (GMPA) for Point Reyes National Seashore and the North District of Golden Gate National Recreation Area.

River Otter Ecology Project, based in Marin County, CA, engages the public in supporting conservation and restoration by linking river otter recovery to the health of our watersheds through research, education, and community science. River otters, although not a protected species, are sentinel apex predators that use every part of watersheds, from headwaters to ocean. Their presence and success are important indicators of ecosystem function and environmental health.

For eight years, we have conducted intensive research on river otter populations within Point Reyes National Seashore (PRNS). Consistent with NPS Management Policy 4.2, our "studies support the NPS mission by providing the Service, the scientific community, and the public with an understanding of park resources, processes, values, and uses that will be cumulative and constantly refined."

Our research entails field study in PRNS at least once a week at up to 10 different sites, and we've had abundant opportunity to observe and document changes and conditions that affect the natural resources and visitor experience in the Seashore. The following comments reflect our organizational mission; our understanding of laws and policies relevant to management of NPS lands generally and PRNS in particular; and our dual role as scientists working to understand the ecosystem function of the park's natural resources, and as members of the public on whose behalf these lands and waters have been entrusted to the care of the National Park Service.

We oppose the NPS Preferred Alternative, Alternative B, because it proposes management actions that are not permissible under NPS Management Policies; that would impair park resources; that would have significant environmental consequences and impacts; and which are incompletely or inadequately analyzed in the DEIS. In addition, some of the proposed mitigation measures would themselves impair park resources, or have foreseeable consequences which are not adequately analyzed.

Many of the impacts on, and impairment of, park resources stem from the proposed action of allowing diversification of ranching activities. The stated purpose of the proposed action is to allow "ranchers to react to poor forage production years and fluctuations in the economic market." (DEIS, page 20). Management actions whose purpose is to promote or protect the economic interests of leaseholders are not legitimate because they are fundamentally at odds with the mandates of the Organic Act of 1916, the PRNS enabling legislation, and current NPS Management Policies.

The DEIS does not specify any Need for Action or Desired Condition that would be met by diversification. On the contrary, the DEIS, in Alternatives Considered but Dismissed from Further Analysis, specifies that diversification of livestock to species other than beef and dairy cattle "...would have too great of an environmental impact" if the diversified species were ducks, geese, turkeys, or rabbits. (DEIS, page 60). The adverse effects from those species include "...potential increase in predation; disease or parasites; loss or degradation of habitat; construction of additional infrastructure (e.g. watering facilities, feed storage facilities, and pens); or the need for the use of non-wildlife friendly fencing." (DEIS, page 60). Those same adverse effects can also be associated with diversification to chickens, sheep, pigs, goats, and even row crops, all of which would be allowed. The DEIS fails to explain how the very same adverse environmental impacts are "too great" on the one hand while on the other they would have no impacts, or impacts that can be adequately mitigated.

Specific significant impacts and foreseeable consequences of diversification not adequately analyzed in the DEIS include:

1. Impairment of Wildlife Resources. The DEIS states that "[m]anagement of any predators associated with new livestock species would not be allowed," a demonstrably false statement given that the very next sentence says that

"[g]uard animals (i.e. dogs, llamas, donkeys) would be allowed..." [DEIS, page 38]. The use of guard animals is a form of predator management. Similarly, the DEIS states that "[m]anagement of any wildlife associated with protection of row crops would not be allowed in the planning area: however, ranchers would be allowed to fence row crops to exclude wildlife." [DEIS, page 38]. Exclusionary fencing is a form of wildlife management.

Appendix D includes a number of other wildlife and predator management strategies, techniques, and equipment that would be allowed in connection with diversification. These include: parking a vehicle in an area of loss by predation [page D-39] and repellents and frightening devices [page D-39] in addition to exclusionary fencing and guard animals.

Statements that wildlife and predator management will not be allowed in connection with diversification are plainly untrue, and the DEIS does not analyze the significant impacts that the proposed actions will have on park wildlife resources. Predators such as coyotes, bobcats, foxes, and badgers, for example, will have reduced hunting areas and opportunities, and will come into conflict with guard animals. Their movement patterns will be disrupted. The DEIS should analyze these foreseeable significant impacts, and determine if they collectively constitute impairment of park resources. The DEIS should also analyze the cumulative impacts on wildlife of all diversification proposals that are likely to be approved, in addition to the impacts from individual proposals.

2. Impacts on Visitor Use and Enjoyment and Scenic Values. The DEIS notes that diversification activities, including new types of livestock, row crops, new fencing, and other new infrastructure would result in adverse impacts to visitors use and enjoyment opportunities, and to scenic values [DEIS, page 168]. The DEIS does not analyze or mitigate for these impacts, either individually from the various ranches, or cumulatively from all diversification activities that could be approved.

Other impacts not fully analyzed or adequately mitigated for in the Preferred Alternative include:

1. Livestock that escape from ranch boundaries can have significant impacts on sensitive park resources. On numerous occasions over an extended period of years, we have observed, documented, and reported to park management the impacts of cattle in and around Abbotts Lagoon, for example. Cattle that had escaped from ranchlands blocked trails, defecated in and around the lagoon, trampled vegetation, and impeded the movement of wildlife. The Ranch Operating Agreements should contain an explicit provision requiring the ranch operator to retrieve escaped livestock as soon as possible (within 24 hours). Failure to do so should result in the cattle being treated as trespass or feral livestock in accordance with NPS Management Policy 8.6.8.3.

2. The impacts of Development to Support Day Use and Overnight Accommodations are not analyzed or adequately mitigated and may cause impairment of park resources. For example, boat-in camp sites on Schooner Bay [DEIS, page 32] foreseeably will have significant impacts on the wilderness area of Drakes Estero, due to trash, human waste, and substantially increased visitor usage, as has happened at boat-in campsites on the west shore of Tomales Bay. Migratory birds and marine mammals will also be negatively affected. The DEIS includes no quantitative or descriptive details of any kind regarding boat-in camping that would allow analysis of, or mitigation for, its impacts. The DEIS also does not explain why within the planning area, the entire shoreline of Drakes Estero, a Congressionally-designated Wilderness, should not be included in the Resource Protection subzone.

3. Impacts to Water Resources are not adequately analyzed because the DEIS contains no meaningful quantitative data on water quality. The DEIS states that "...existing conditions serve as baseline against which the impacts of each action alternative are compared." [DEIS, page 112]. However, the existing conditions are not described in quantitative or detailed manner. Pursuant to NPS Management Policy 4.6.3, NPS must "take all necessary actions to maintain or restore the quality of surface waters and groundwaters within the parks..." Under that standard, if the existing condition of any surface or groundwater in the planning area is impaired, a proposed action alternative should restore water quality, not maintain a baseline impairment. The DEIS is deficient in not identifying existing impairments to water resources.

4. The native tule elk are a park wildlife resource that should only be managed for the benefit and non-impairment of the resource, not for the economic benefit of commercial leaseholders.

The Draft Foundation Document rightly places the current ranching activities within the context of a 5,000-year continuum of human use of the Point Reyes landscape. In contrast, the NPS Preferred Alternative, Alternative B, attempts to put all of the Park's Fundamental Resources and Values squarely in the context of ranching. As a result, the DEIS ignores or glosses over significant impacts that will foreseeably result, individually and cumulatively, from the proposed actions. We recommend that NPS develop and analyze a new alternative that mitigates impacts from current ranching activities, eliminates activities that impair park resources, and does not expand the agricultural activities beyond the present multigenerational ranching and dairying.

Thank you for the opportunity to comment on the Draft Environmental Impact Statement for the GMPA. We look forward to continuing to actively participate in the GMPA process.

Sincerely,

Megan Isadore, Co-Founder and Executive Director River Otter Ecology Project

#6668

Name: N/A, Samantha

Correspondence: I am writing to urge the National Park Service to discontinue the grazing of beef and dairy cattle at Point Reyes National Seashore. This precious area has been damaged by livestock grazing which poses a threat to the environment and local wildlife and it should be protected and used to serve the public good, and not for the benefit of the livestock industry.

I strongly oppose Option B and any other proposal that would be fatal to Tule Elk or other wildlife to the benefit of ranching operations, and encourage the agency to adopt Option F to discontinue grazing and allow members of the public to enjoy this beautiful park and to be enriched with opportunities to visit and appreciate this special place.

#6669

Name: Hall, Janice

Correspondence: Please stop this

#6670

Name: Collins, Christine

Correspondence: Please stop destroying the beautiful wildlife for corporate greed. Animal agriculture has destroyed so much of our natural world along with cause enormous amounts of suffering to animals. It is well past time to change our food system to one that supports nature and kindness and well as good health. Leave the elk alone! Christine Collins

#6671

Name: Nypaver, Sandi

Correspondence: I am writing to urge the National Park Service to discontinue the grazing of beef and dairy cattle at Point Reyes National Seashore. This precious area has been damaged by livestock grazing which poses a threat to the environment and local wildlife and it should be protected and used to serve the public good, and not for the benefit of the livestock industry.



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#6672

Name: Beam, Sarah

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#6673

Name: Wertheimer, Laura

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#6674

Name: Kusnierz, Joni

Correspondence: I am writing to urge the National Park Service to discontinue the grazing of beef and dairy cattle at Point Reyes National Seashore. This precious area has been damaged by livestock grazing which poses a threat to the environment and local wildlife and it should be protected and used to serve the public good, and not for the benefit of the livestock industry.

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Sincerely, Joni Kusnierz

#6675

Name: N/A, N/A

Correspondence: I am writing to urge the National Park Service to discontinue the grazing of beef and dairy cattle at Point Reyes National Seashore. This precious area has been damaged by livestock grazing which poses a threat to the environment and local wildlife and it should be protected and used to serve the public good, and not for the benefit of the livestock industry.

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#6676

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#6677

Name: Lazarus-Gardner, Laura

Correspondence: I am writing to urge the National Park Service to discontinue the grazing of beef and dairy cattle at Point Reyes National Seashore. This precious area has been damaged by livestock grazing which poses a threat to the environment and local wildlife and it should be protected and used to serve the public good, and not for the benefit of the livestock industry.

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#6678

Name: Wozney, Nancy

Correspondence: I oppose any proposals that endanger the Tule elk!!!

#6679

Name: Wilson, Judy

Correspondence: Please don't kill the elk for cattle

#6680

Name: N/A, N/A

Correspondence: Sept. 20, 2019

NPS Pt. Reyes General Management DEIS Comments

I have been a resident of Marin for over forty years of my life; both as a child growing up in San Rafael and as an adult returning to Terra Linda to raise my own family. Family outings to the beach, drives along the coast, and hikes on wildflower-strewn trails are treasured memories. As a child I was also amused by seeing signs for the Historic A, B, C, etc. ranches as we drove along. They were part of the landscape.

Imagine then how shocked and horrified I was when on a recent trip to Pt. Reyes, I drove by hundreds of CAFO-style veal cages on one piece of "historic" ranch property. Lands around the barn and on the hillsides on the other side were trampled, muddied and deeply rutted.

This is not historic ranching. This is not an "educational" usage. This is not humane. This is not suitable in a National Park or National Seashore. This is not what the public paid for when they bought the lands from private owners with the proviso that "family ranchers" could continue to ranch there, as had been done elsewhere when private lands have been purchased for public lands. This should not be allowed.

Industrial ranchers are extractive, exploitative, and only concerned with maximizing profits. They leave when the land is played out, or when they can no longer make a profit, or when they can't expand to continue exploiting the area. This is what we are seeing in Pt. Reyes.

The NPS should be ashamed of sacrificing the health and wild values of this land that is under their stewardship due to political pressure from industrialized ranching, which is what Alternative B is proposing. The NPS is putting industrial cattle ranching and dairy farming ahead of the plants and animals that are native to the park, including the Tule Elk.

Real family ranchers steward the land for generations, intending to pass along their property to their children to enjoy and maintain for their children. Real family ranchers do what is best for their animals and the land because they want it to be useful, valuable and worthwhile to give to their children. Real family ranchers incorporate BMPs, not because they are imposed from above, but because they see the benefit to their land and their finances and their continued way of life.

Leases were developed in order to continue real, traditional, family ranching, at historical levels. The Founding legislation was not designed to allow ranching or private commercial enterprises to remain in the park indefinitely. It allowed private owners to continue their way of ranching, and pass it along to their children to continue, and for the Park to retire those leases when the family no longer had an interest in continuing to ranch.

This situation is no different from allowing uranium mining in the Grand Canyon or oil and gas exploration and drilling in the Arctic. Extractive, resource exploitative and wilderness value destroying human activity is expressly forbidden from our National Parks. This is completely understood by the general public and it is an abrogation of public trust for the NPS to do otherwise.

Local ranches outside the park-that operate on their own land, not the public's land-are using more sustainable ranching practices in order to minimize their impacts to the environment. Ranchers at the Seashore do not. Under the NPS plan, methods to counter climate change, such as cutting methane and sequestering carbon, are voluntary. This is absurd and contrary to resource protection.

This DEIS as written is completely inadequate and fails to do the job required. None of the alternatives explain how the wild values of this Park will be protected, enhanced, or preserved for the future. Instead, and most especially in the so-called "preferred" alternative B, the land will be further degraded, eroded, contaminated and mismanaged for the benefit of a few commercial operations at the expense of the Park, visitors, other wildlife, streams, ponds and receiving waters, and the plants that are expected by the public to be protected, preserved and enhanced. None of the other alternatives fare any better.

The NPS clearly lacks the funding currently to do their job effectively, and to maintain facilities. This is the fault of higher-level policies that seek to destroy the public commons and our National Parks and other public lands by passing them into private hands. Therefore, it is also clear that the NPS does not have the funding now or in the future to manage bad actors in the National Seashore. Relying on environmental groups to be the "watchdogs" as reported in a recent newspaper article has never been effective, as the NPS also lacks the will and funding to enforce rules and regulations against powerful industrial ranchers with their equally powerful political ties.

Pt. Reyes is the only National Park/Seashore that has NO funding source from visitors. Every other National Park has funding from visitors. Pt. Reyes has to rely upon Federal funding, which has been cut and slashed every year, putting Park rangers in an untenable position when it comes to doing their job. It is estimated that there is deferred maintenance budget of over \$100 Million dollars due to inadequate funding.

For the DEIS to be complete, the NPS has to go back and prepare additional information on: • How will true historical and educational values be restored, enhanced, and protected? • How will the wilderness values of the Park be preserved, protected and enhanced? • How will the NPS manage this Park under any of the alternatives if, as they say, they expect no additional funding and they are not able to manage the Park well with current levels of funding? • How will the NPS reach out to secure additional funding for the deferred maintenance as well as daily operations needed to perform its mission of stewardship? • For any alternative that presents itself as an alternative, how will it be accomplished with what funding? • How will the Tule Elk be protected as a keystone species?

We also need answers to the following questions: • Is it legal for the Park service to allow transfer of old leases to new owners who are not related? • Is it legal for the Park service to allow expansion of ranching/farming operations when this is not in the founding legislation? • How will CAFO-industrial ranching practices be removed from the park as being out of compliance under the language of the founding legislation?

Climate change and massive species extinction have changed what we need to do going forward. The NPS needs to scrap this old paradigm and offer one that promotes carbon sequestration, species diversity, and resource protection and enhancement. Specifically this new plan would: • Phase out the ranches that are not family operated or following Marin Carbon Project BMPs for rotational grazing and appropriate numbers of cows/acre • Disallow all commercial livestock operation within the park. • Prioritize wildlife over domestic cattle. • Support and enhance biodiversity of native species of plants and animals • Repurpose historic ranch buildings for scientific research, interpretation and public education.

I refer to and support the letters from the Natural Heritage Institute, Susan Ives, James Coda, Audubon Society, Sierra Club, Watershed Alliance of Marin, Center for Biological Diversity and Restore Pt. Reyes National Seashore, to name a few.

Sincerely yours,

Judy Schriebman

“Think about all the beautiful redwood parks scattered up and down California's coast. Nearly all of these parklands were created by purchasing the land from private property owners, just like we the public bought the ranches that remain in Point Reyes National Seashore. Now imagine that the previous landowners not only refused to leave our redwood parks but continue to cut down redwoods even after we bought the land and the trees for preservation. That is precisely what is going on in Point Reyes National Seashore...” - ecologist George Wuerthner

#6681

Name: Larson, Gwendolyn

Correspondence: I beg you not to go through with this invasion on native grasslands. This is a shortsighted and greedy decision that will cause major harm to wildlife.

#6682

Name: Turnbull, Bonnie

Correspondence: The ranchers shouldn't be allowed to graze on public lands, they are for the people and wildlife to enjoy. Do not destroy the beauty of this land and of the wildlife it supports for the greed of cattle ranchers!

#6683

Name: Nypaver, Rachel

Correspondence: I am writing to urge the National Park Service to discontinue the grazing of beef and dairy cattle at Point Reyes National Seashore. This precious area has been damaged by livestock grazing which poses a threat to the environment and local wildlife and it should be protected and used to serve the public good, and not for the benefit of the livestock industry.

I strongly oppose Option B and any other proposal that would be fatal to Tule Elk or other wildlife to the benefit of ranching operations, and encourage the agency to adopt Option F to discontinue grazing and allow members of the public to enjoy this beautiful park and to be enriched with opportunities to visit and appreciate this special place.

As a current resident of Estes Park, CO, where elk are currently bugling peacefully in town, attracting visitors that support local businesses, I am aghast at Option B. This is option is good for no party, especially in this pertinent time in reducing climate change.

Sincerely,

Rachel A. Nypaver

#6684

Name: Muletz, Janelle

Correspondence: I am writing to urge the National Park Service to discontinue the grazing of beef and dairy cattle at Point Reyes National Seashore. This precious area has been damaged by livestock grazing which poses a threat to the environment and local wildlife and it should be protected and used to serve the public good, and not for the benefit of the livestock industry.

I strongly oppose Option B and any other proposal that would be fatal to Tule Elk or other wildlife to the benefit of ranching operations, and encourage the agency to adopt Option F to discontinue grazing and allow members of the public to enjoy this beautiful park and to be enriched with opportunities to visit and appreciate this special place.

#6685

Name: Cliff, Sand

Correspondence: Please preserve the land for The Elk. Do not kill. Preserve for our children. Thank you!!

#6686

Name: Iannelli, Angela

Correspondence: The park is home to native wildlife and their lives should be protected.

#6687

Name: N/A, N/A

Correspondence: The coastal prairie is vital to our biosphere. The Tule Elk are vital to the coastal prairie. Cows and sheep are not, and in fact destroy this ecosystem.

Restore our coastal ecosystem to help mitigate climate chaos and ocean rise damage! Adopt Alternative F.

#6688

Name: McLean-Merten, Shari

Correspondence: I am writing to urge the National Park Service to discontinue the grazing of beef and dairy cattle at Point Reyes National Seashore. This precious area has been damaged by livestock grazing which poses a threat to the environment and local wildlife and it should be protected and used to serve the public good, and not for the benefit of the livestock industry.

I strongly oppose Option B and any other proposal that would be fatal to Tule Elk or other wildlife to the benefit of ranching operations, and encourage the agency to adopt Option F to discontinue grazing and allow members of the public to enjoy this beautiful park and to be enriched with opportunities to visit and appreciate this special place.

#6689

Name: Pratt, Joe

Correspondence: I urge the national Park service to not kill the tule elk at point Reyes national seashore in order to protect the profits of the beef and dairy industry. Tule elk which are native to point Reyes were exterminated and then re-introduced by the national Park service. Now the beef and dairy ranchers who know longer own the land they occupy want to extend their land leases and call the Drakes Bay tule elk herd. We asked the Park service to protect wildlife over industry profits and select alternative F for no ranching and for protection of the tule elk herd and other wildlife. Point Reyes national seashore is a biologically diverse park that attracts visitors from all over the world who want to see the tule elk. Our national parks are for nature not agribusiness. Alternative F is the only viable solution to preserve and restore the natural values of the park.

It is time to follow the 1962 law which specifies that the point Reyes national seashore should preserve and restore the natural ecology of this beautiful area. Cattle ranching has destroyed much of the beautiful area are on which the elk live and it would be great if all this ranching on this preserved area were ended. Surveys of frequent visitors to this area show that a large percentage come to see the elk. A very small percentage have nothing to do with the ranchers. It's also been proven that the financial benefits of the Parke fall out far outweigh the financial benefits of the dairy farming.

Thank you for your consideration of this comment.

#6690

Name: N/A, N/A

Correspondence: Please do not allow these Elk to be killed! Enough is enough with using our precious land and resources to raise meat! It is killing this planet!! Please do not kill these poor Elk!

#6691

Name: lagerhausen, lana

Correspondence: I am writing to urge the National Park Service to discontinue the grazing of beef and dairy cattle at Point Reyes National Seashore. This precious area has been damaged by livestock grazing which poses a threat to the environment and local wildlife and it should be protected and used to serve the public good, and not for the benefit of the livestock industry.

I strongly oppose Option B and any other proposal that would be fatal to Tule Elk or other wildlife to the benefit of ranching operations, and encourage the agency to adopt Option F to discontinue grazing and allow members of the public to enjoy this beautiful park and to be enriched with opportunities to visit and appreciate this special place. Thank you. Sincerely, Alana Lagerhausen

#6692

Name: Irani, Faria

Correspondence: There is absolutely no excuse for killing the elk. That is THEIR home. The ranchers need to find another place to graze their cattle!

#6693

Name: Norrell, Donna

Correspondence: Hello, I am a 65yr old avid cyclist and know the dangers of road cycling all too well. Even in Pt Reyes, with the RV's, horse trailers, etc., it is a big risk. I am getting older, and mountain biking, though off the roads, takes a lot of strength and balance. I take my granddaughters out on bike trails, safe from traffic, but it is limited and in cities. Offering easy ranch roads, possibly 15-25mile loops or so, for family groups to cycle in the great Pt Reyes outdoors would be a great way to introduce the next generation to Pt Reyes....your future supporters!

I'm writing to support the public access and bicycling improvements outlined under Alternatives B, C, D, E, and F. I strongly support proposals that would lead to the planning and implementation of bicycling routes on trails, ranch roads, and pathways throughout the planning area, including but not limited to: 1) a connection between Devil's Gulch and Platform Bridge Road using existing ranch roads, 2) a connection between Bolinas Ridge Trail at Olema Hill and Point Reyes Station to serve as an interim connection for the Cross Marin Trail, 3) a connection between Bolinas Ridge Trail and Five Brooks Stables using existing ranch roads 4) a connection between Drakes Estero and Abbotts Lagoon Trail using existing ranch roads, 5) a connection between Marshall Beach Trailhead and Pierce Point Road using existing ranch roads, and 6) an Estero Trail loop using existing ranch roads. I encourage NPS to collaborate with ranchers and other stakeholders to educate the public and address concerns related to public access on working ranch lands.

The improvements outlined above would enable and encourage me to visit the Seashore more regularly-and by bike, rather than car. I would feel much safer riding in the Seashore and surrounding areas on trails, pathways, and ranch roads, rather than on roads shared with fast-moving vehicular traffic. Bicycling opportunities are currently very limited and fragmented, so any improvements in connectivity and the creation of new loop options would enable me to enjoy more of the Seashore and surrounding areas by bike.

#6694

Name: Oster, Sherry

Correspondence: I care about protecting California's wildlife. I oppose the National Park Service's plan to kill native tule elk and expand commercial agriculture in Point Reyes National Seashore and Golden Gate National Recreation Area. I urge the National Park Service to instead restore the lands for wild animal habitat. The Park Service is required under its enabling legislation to manage the seashore "without impairment of its natural values" and for "maximum protection, restoration, and preservation of the natural environment." Restoring native wildlife and ecosystem processes is supposed to be one of the primary missions of the Park Service. The Tule Elk are a flagship species for California (the California Floristic Province, one of the world's 25 biodiversity hotspots or most endangered ecoregions) and North America. As a flagship species, Tule Elk are a symbol for conservation efforts in California over the last century. Tule Elk are also considered an important Focal or Umbrella Species as Tule Elk range and ecological niche covers such a large area of California's landscape. Protecting the landscape for large, free roaming species (like Tule Elk) enhances the conservation and protection efforts of so many other species of California. Elk graze on grasses and flowering plants and also browse shrubs and trees. Unlike cattle, elk move around to take advantage of seasonal food sources. Elk can reduce fire danger by browsing brush that is unpalatable to cattle, without impacts to water quality. We should prioritize the preservation of our public lands and wildlife, not the economic interests of private ranchers or any private/commercial interests. National parks exist to protect our natural resources and native wildlife. This park should be managed accordingly.

#6695

Name: Ganeshan , Jill

Correspondence: I am writing to urge the National Park Service to discontinue the grazing of beef and dairy cattle at Point Reyes National Seashore. This precious area has been damaged by livestock grazing which poses a threat to the environment and local wildlife and it should be protected and used to serve the public good, and not for the benefit of the livestock industry.

I strongly oppose Option B and any other proposal that would be fatal to Tule Elk or other wildlife to the benefit of ranching operations, and encourage the agency to adopt Option F to discontinue grazing and allow members of the public to enjoy this beautiful park and to be enriched with opportunities to visit and appreciate this special place.

#6696

Name: Davis, T

Correspondence: Change needs to happen NOW and you need to hear our voices.

I am writing to tell the National Park Service to discontinue the grazing of beef and dairy cattle at Point Reyes National Seashore.

This precious area has been damaged by livestock grazing which poses a threat to the environment and local wildlife and it should be protected and used to serve the public good, and NOT for the benefit of the livestock industry.

I STRONGLY oppose Option B and any other proposal that would be fatal to Tule Elk or other wildlife to the benefit of ranching operations, and encourage the agency to adopt Option F to discontinue grazing and allow members of the public to enjoy this beautiful park and to be enriched with opportunities to visit and appreciate this special place.

#6697

Name: Schramm , Valerie

Correspondence: I am writing to urge the National Park Service to discontinue the grazing of beef and dairy cattle at Point Reyes National Seashore. This precious area has been damaged by livestock grazing which poses a threat to the environment and local wildlife and it should be protected and used to serve the public good, and not for the benefit of the livestock industry.

I strongly oppose Option B and any other proposal that would be fatal to Tule Elk or other wildlife to the benefit of ranching operations, and encourage the agency to adopt Option F to discontinue grazing and allow members of the public to enjoy this beautiful park and to be enriched with opportunities to visit and appreciate this special place.

#6698

Name: Douglas, Nadra

Correspondence: I believe protection of the Tule Elk is critical to the survival of the species and believe the fence at Pierce Point should be removed to allow the elk to roam free. These are public lands and protection of the native species should be the prime consideration. I see no reason to allow private business the use of public resources.

Thank you for your consideration of my comments.



#6699

Name: martens, linda

Correspondence: The animal agriculture industry has routinely taken advantage of preferential access to land, water, and other resources, and that is currently the case in Point Reyes National Seashore in Marin County, CA. Over 5,000 cattle who are being exploited for beef and dairy production are grazing in the public park, and pose a threat to the environment, wildlife, and the public good.

The ranchers' leases are set to expire, and the National Park Service (NPS) is asking for public comments to help them determine whether or not to extend the leases or to take another approach. Shockingly, several NPS proposals include killing the native Tule Elk in order to continue grazing livestock. Please write and urge the NPS to end livestock grazing at Point Reyes National Park and to allow this precious land to remain as wildlife habitat and to be used for the public good, not for the benefit of the livestock industry. THIS IS NOT ACCEPTABLE. To support a few for the many?

I STRONGLY OPPOSE Option B and any other proposal that would be fatal to Tule Elk or other wildlife to the benefit of ranching operations, and encourage the agency to adopt Option F to discontinue grazing and allow members of the public to enjoy this beautiful park and to be enriched with opportunities to visit and appreciate this special place.

#6700

Name: Patel, Shital

Correspondence: Please do not renew the lease and further destroy wildlife. "Our home is on fire." -Greta Thunberg. We must act.

#6701

Name: Decker, Valerie

Correspondence: I am writing to urge the National Park Service to discontinue the grazing of beef and dairy cattle at Point Reyes National Seashore. This precious area has been damaged by livestock grazing which poses a threat to the environment and local wildlife and it should be protected and used to serve the public good, and not for the benefit of the livestock industry.

I strongly oppose Option B and any other proposal that would be fatal to Tule Elk or other wildlife to the benefit of ranching operations, and encourage the agency to adopt Option F to discontinue grazing and allow members of the public to enjoy this beautiful park and to be enriched with opportunities to visit and appreciate this special place.

I urge to consider the ramifications killing Tule Elk will cause as well as the destruction of our land for cattle.

#6702

Name: Fleming, Bruce

Correspondence: Adopt alternative F: no farming or ranching, preserve wild species.

#6703

Name: Duhamel, Helen

Correspondence: I am writing to urge the National Park Service to discontinue the grazing of beef and dairy cattle at Point Reyes National Seashore. This precious area has been damaged by livestock grazing which poses a threat

to the environment and local wildlife and it should be protected and used to serve the public good, and not for the benefit of the livestock industry.

I strongly oppose Option B and any other proposal that would be fatal to Tule Elk or other wildlife to the benefit of ranching operations, and encourage the agency to adopt Option F to discontinue grazing and allow members of the public to enjoy this beautiful park and to be enriched with opportunities to visit and appreciate this special place.

#6704

Name: Min, Ami

Correspondence: Please do not kill or displace elk (or any other animal) in favor of beef or any other farming operation.

#6705

Name: Min, Ami

Correspondence: I am writing to urge the National Park Service to discontinue the grazing of beef and dairy cattle at Point Reyes National Seashore. This precious area has been damaged by livestock grazing which poses a threat to the environment and local wildlife and it should be protected and used to serve the public good, and not for the benefit of the livestock industry.

I strongly oppose Option B and any other proposal that would be fatal to Tule Elk or other wildlife to the benefit of ranching operations, and encourage the agency to adopt Option F to discontinue grazing and allow members of the public to enjoy this beautiful park and to be enriched with opportunities to visit and appreciate this special place.

#6706

Name: Chandler, Polly

Correspondence: Point Reyes is a unique national seashore that is multi-use in it's nature: recreation, preservation, ranching. It is my understanding that the partnership between ranching and the NPS was allowed this amazing landscape to be preserved.

It has resulted in a national seashore treasure.

My concern is that this once remote, relatively undiscovered park has had exponential growth in attendance. Trails are heavily used, there are areas of congestion, and now some areas of the park are being overused. The Pierce Ranch trail for example, once one of my favorite trails, is now so busy on weekends that I avoid coming to the park.

The NPS has an opportunity to evaluate the best opportunity to preserve this landscape, make it accessible, and ensure that diverse populations can access, utilize, and enjoy the park without causing overuse.

The recent closure of Drakes Beach was a classic example of preservation and park visitation. To the parks credit, they closed the beach to protect the elephant seals. This closure pushed more visitors to other areas of the park. Again, causing crowding, overuse of trails, etc... Since elephant seals are getting more and more established at the park, I could see a time where the entire beach has to be closed.

My sense is that this is the NPS opportunity to evaluate their partnerships and cast a bold, strategic vision that will ensure long term preservation of the park for diverse users. At this point, I don't think due diligence has been done on the strategic vision.

I can see an approach where less ranching could be balanced with preservation, visitor services, and history. Right now, I don't think there has been enough innovation. This is not a black and white issue, of no ranching vs. all ranching. Let's push the pause button and get clearer on what matters most.

I for one want to enjoy Point Reyes for the rest of my life. It is one of the reasons I moved to California. And, for years, I have enjoyed it without crowds. Now it's getting more and more crowded, I find myself not going to the park as much, never on weekends, and I therefore ask for a more strategic conversation that is not Us vs Them but serves the collective vision of the NPS: to serve all people from broad walks of life so they can enjoy nature of the seashore, observe protected species, engage with preserved fragile landscapes. Right now, unless more of the landscape is preserved and made accessible the fragile seashore resources are at risk.

#6707

Name: Cornwell, Charles

Correspondence: I support alternative F

Point Reyes National Seashore is a treasure with unusual and beautiful ecosystems. The pollution and fences of the ranches on park land is unfortunate. It is time to restore the park to a more natural state. We need our future generations to have an appreciation of nature. I think a restored Point Reyes National Seashore would inspire more of our youth to make a difference.

#6708

Name: Wright, Lorraine

Correspondence: Please adopt Alternative F, which would discontinue farming and ranching opportunities in the park and expand visitor opportunities. The preservation of native wild species must take precedence over farming and ranching activities. Grazing negatively affects ecosystems, causing water pollution and soil erosion, spreading invasive species and disease, and harming endangered species.

#6709

Name: N/A, Catherine

Correspondence: I am writing to urge the National Park Service to discontinue the grazing of beef and dairy cattle at Point Reyes National Seashore. This precious area has been damaged by livestock grazing which poses a threat to the environment and local wildlife and it should be protected and used to serve the public good, and not for the benefit of the livestock industry.

I strongly oppose Option B and any other proposal that would be fatal to Tule Elk or other wildlife to the benefit of ranching operations, and encourage the agency to adopt Option F to discontinue grazing and allow members of the public to enjoy this beautiful park and to be enriched with opportunities to visit and appreciate this special place.

#6710

Name: Dodge, Elizabeth

Correspondence: Comments Park: Point Reyes National Seashore Project: Point Reyes National Seashore and North District Golden Gate National Recreation Area General Management Plan Amendment and Environmental Impact Statement Document: General management Plan Amendment Draft Environmental Impact Statement

Comment: This document should have a list of acronyms. Although it generally does a good job of avoiding the need for them, there are still numerous acronyms not in common use, such as RDM, RUO, ROA, ASBS, BA, and many others that impair the public's ability to read the document in a timely way. I've requested an extension to the

comment period but have not received a reply from the National Park Service. Many of the appendices include a list of acronyms and it is extremely helpful. Comment: This document should also include a References Cited section listing the full information for references cited, of which there are many throughout this document.

Executive Summary Page iii - Alternative B mentions ranch subzones (Resource Protection, Range, Pasture, and Ranch Core subzones) but does not define what specific activities would be allowed under each of these subzones. Since this appears to be a key feature of the preferred alternative and this is the first reference of these subzones, they should be defined here as well as later in the document for better clarity for readers.

Page vii - Under alternative C, the document states NPS would lethally remove the Drakes Beach herd, totaling approximately 124 individual elk... overall viability of the Tule elk population in Point Reyes or in California would not be affected& Given the lack of genetic diversity in the Tule Elk at Point Reyes, this should address how killing so many elk would not reduce the viability of this already small herd.

General Comment: the legislation that created the Point Reyes National Seashore (16 U.S. Code §459c.Point Reyes National Seashore); purposes; authorization for establishment In order to save and preserve, for purposes of public recreation, benefit, and inspiration, a portion of the diminishing seashore of the United States that remains undeveloped, the Secretary of the Interior (hereinafter referred to as the Secretary) is authorized to take appropriate action in the public interest toward the establishment of the national seashore set forth in section 459c-1 of this title. Point Reyes is a beautiful National Park, but ranches occupy the most scenic land in Point Reyes. Particularly Ranches A, B, C, E, F, G, and H which front the Pacific Ocean. There a few roads to the ocean, but these ranches dont have hiking trails on them. In order to fulfill the US Governments intention of public recreation, benefit, and inspiration, the NPS must create hiking trails on these ranches that allow the public to hike along the beautiful bluffs near the ocean.

Chapter 1, page 3 - Enabling Legislation. To provide a full context of the park creation, the discussion of the 1978 legislation (16 USC 459c-5(a) and (b)) should include the legislative language that the owner of improved property or of agricultural property on the date of its acquisition by the Secretary under sections 459c to 459c-7 of this title may, as a condition of such acquisition, retain for himself and his or her heirs and assigns a right of use and occupancy for a definite term of not more than twenty-five years, or, in lieu thereof, for a term ending at the death of the owner or the death of his or her spouse, whichever is later.

Chapter 2 - Succession. Page 13 and throughout the document (e.g. page 37). Offering relinquished leases to other ranchers is inconsistent with the Parks founding legislation to to save and preserve, for purposes of public recreation, benefit, and inspiration, a portion of the diminishing seashore of the United States that remains undeveloped. If a lease/permit is relinquished, it provides an excellent opportunity for the National Park Service retire the lease and return that land to native habitat, which is what most Park visitors come to see. Alternatively, such lands could be offered to the Coast Miwok tribe who lived on these lands long before the ranchers.

Chapter 2, Table 1 - Permitted Acreage and Use on Ranches, pages 14 - 19. The sixth column Actual Number of Cattle is blank for 26 ranches. This table should be completed in the final EIS.

Chapter 2, Diversification page 20 and throughout the document (pages 37 - 38). New uses like chicken farms, goats, sheep, and row crops do not conform to the purported goal of the NPS for ranches to preserve and portray historic Point Reyes activities. The NPS says it seeks to maintain the historic character of the park; this diversification, while it may financially benefit dairy ranchers, does nothing to enrich the experience of visitors to the park. Adding these types of livestock will also attract natural predators such as coyotes. How will the NPS address predation on these proposed newly introduced livestock?

Chapter 2, Range Management and Monitoring page 20 and throughout the document. If the Ranches at Point Reyes are being preserved for historic value, this document should explain how historic range management practices will be conducted in a manner as they were prior to the creation of the park. The historic value of many

ranches have already been degraded by the construction of very modern-looking facilities and modern operations.

Chapter 2, Livestock Water Supply page 21. It is documented that many (some report several hundred) Tule Elk behind the Tule Elk reserve fence died during the drought in 2014. It is unconscionable that the NPS concerns itself with water supplies for non-native cattle while allowing the iconic Tule elk to die.

Chapter 2, prescribed grazing page 22 and throughout the document. Most readers are unfamiliar with this term - it would be helpful if a definition could be included in this section. It would also be helpful if a description of the specific prescribed grazing the NPS has developed with each ranch could be provided and where these plans can be accessed by the public.

Chapter 2, Manure and Nutrient Management - page 23, Paragraph 1, last sentence notes that the parks dairies are required to comply with a monitoring and reporting program and develop and implement site-specific management plans. This DEIS should include more details about the contents of these plans, results of implementation and monitoring, and how the public can access and review these plans. Please indicate whether the ranchers or the NPS pays to develop and implement these plans. Although California requires manure management plans for dairies, they do not need to be limited only to dairies. Given the proximity of all Point Reyes ranches to coastal waters which drain into Abbots Lagoon, Tomales Bay, Drakes Estero, Estero de Limantour, or directly to Kehoe beach and other parts of the Pacific Ocean, it would be beneficial to visitor health and recreation if these monitoring and management plans were applied to beef ranches as well.

Chapter 2, New Development, Infrastructure Improvements, and Alterations page 24. Second paragraph suggests that ranchers make improvements to historic structures at their own cost. Is this correct? Please clarify in the document.

Chapter 2, Alternative B - NPS Preferred Alternative page 25 paragraph 2. Because the ranchland subzones appear to be a key component of this proposed general plan amendment, they should be described and defined here as well as later on page 35. This paragraph states that the Ranchland Zone would replace the existing Pastoral Lands and Pastoral Management zones, but comparing Figures 4 and 6 it appears the Ranchland Zone would also replace the Natural Environment/Natural Landscape Management zone, Special Use Zone, and lands acquired after 1980. If true, this should be stated. Is this the 7,600 acres referred to that were not included in the Pastoral Lands and Pastoral Landscape areas in to 1980 GMP? This document needs an explanation as to why these areas, especially the Natural Environment/Natural Landscape Management zone and Special Use Zone are now being opened to grazing as pasture and range zones. Most visitors to Point Reyes National Seashore prefer to see natural habitats and wildlife rather than grazing cattle, of which there is already an abundance.

Chapter 2 Table 2, Strategies for the preservation of Area Resources pages 27 - 30: Column 1, Row 1 - Ecological Function: under the bullet Locate and design visitor use improvements to minimize impacts to ecological function please add another bullet Locate and design ranch use improvements to minimize cattle impacts to ecological function Column 2, Row 2 - Air, Water, Noise and light Pollution - the first bullet states Regulations include total maximum daily loads and associated grazing waivers in the Tomales Bay watershed, as well as waivers of discharge requirements for confined animal facilities. Most of the ranches in the Point Reyes National Seashore are not in the Tomales Bay Watershed and therefore are not covered in the Regional Water Quality Control Board Waiver of Waste Discharge Requirements. Please see comment under Chapter 3, page 67 below. Column 2, Row 3 - Desired Condition: Habitats and populations of threatened and endangered species, special-status, and rare species persist and are improved, first bullet Identify authorized ranching activities and monitor and enforce rancher compliance with permit requirements. Please describe what specific permits ranchers have that regulate protection of listed species and how these are monitored and enforced. Column 2, Row 4 - Desired Condition: Native plant and animal communities persist and thrive. First bullet Identify authorized ranching activities and monitor and enforce rancher compliance with permit requirements. Please describe what permits ranchers have that regulate protection of native plant and animal communities and how these are monitored and enforced. These should incorporate the findings of Estimating Impact of Mowing in the Silage Fields of Point Reyes National Seashore on

Nesting Birds (Ryan T. DiGaudio, Diana L. Humple, Thomas Gardali, August 2015) Which include: 1. Find alternatives to ranchers forage needs. 2. Defer mowing with a silage buy-out program - a strategy used for Tricolored Blackbird nest colony conservation (Meese 2009). 3. Delay mowing until after most breeding is complete (Jones and Vickery 1997, Hyde and Cambell 2012, Perkins et al. 2013). 4. Plant silage later in season to avoid mowing at the peak of breeding season. 5. Mow very early (before mid-March) before nesting is underway for most species. This would also allow enough time for birds to re-nest within the same breeding season should they lose their nest to early mowing (Perlut et al. 2006). 6. Consider impacts of the second mowing cycle that is conducted in some years. 7. Mow from inside the middle of the field toward the outside in a circular manner- this increases the likelihood for wildlife to escape (Ochterski 2006, NRCS 2009 Hyde and Cambell 2012). 8. Use flushing bars attached to the mower, a mechanism that helps to flush incubating birds and mammals (especially deer and rabbit) before the mower reaches them (Jones and Vickery 1997, Hyde and Cambell 2012). 9. Avoid mowing at night. Mowing at night results in higher wildlife mortality, including adult birds that do not flush from their nests as readily then (Jones and Vickery 1997, NRCS 2009, Hyde and Cambell 2012). 10. Implement avian surveys to identify high-priority or high-density breeding areas within the silage and avoid mowing there (Jones and Vickery 1997). High priority areas could be those identified as having nests of species with special conservation status, or areas with particularly high concentrations of nesting birds, such as Red-winged Blackbird colonies (however, in 2015, the Red-winged Blackbird colonies found in silage were fairly evenly distributed and not clumped) 11. Employ wildlife hazing and/or deterrents to discourage birds from establishing territories and nesting until after mowing. Hazing methods may include pyrotechnics (e.g. propane canons), audio devices emitting distress or predator calls, electronic noises. Deterrents may include visual devices such as mylar ribbons, predator decoys, lasers, or mechanical devices such as rotating rods. The use of hazing techniques to prevent breeding of Tricolored Blackbirds suggest that the practice must be consistently and intensively applied (CDFW 2015). 12. Use rotational mowing - rotate which silage fields are mowed early, late, or rested entirely for a year or two. Rotational mowing can maintain grassland communities in various stages of growth and vegetative diversity, thus potentially providing more nesting habitat for grassland birds (Hyde and Cambell 2012; NRCS 2009; Ochterski 2006). 13. Raising mower blades to six inches or more may avoid crushing some nests and young (Jones and Vickery 1997) 14. During drought years when the silage may be less productive, discuss whether the option of not mowing may be more cost effective or have other management considerations associated with it. 15. Explore ways to reduce the amount of wild radish (*Raphanus raphanistrum*) and mustards (*Brassica* sp.) in silage fields that may attract certain nesting birds. These plants provide nesting habitat for species like Song Sparrow and White-crowned Sparrow that prefer more rigid nesting substrates, and may also contribute to attracting other nesting species such as Northern Harrier and Red-winged Blackbird. Column 2, Row 6, - Desired Condition: National Register historic districts, including contributing landscapes and structures, are preserved in a manner that maintains their integrity. Third bullet NPS staff would collaborate with ranchers to interpret traditional land use and current agricultural practices. If these are truly historic districts current practices should be the same as traditional and reflect practices in place prior to the establishment of the park. The Pierce Point Ranch beautifully showcases historic practices such as milking by hand.

Chapter 2, page 31 - 33 Public Use and Enjoyment this section is full of vague promises that the NPS would strive to improve hiking, biking and equestrian access, look for opportunities to expand day use, explore new opportunities&to help interpret, explore expanded shuttle use. These ring hollow, as there is no good reason the NPS service couldnt have undertaken these things years ago. With the current budget tightening at the NPS it seems even less likely these would happen now. This looks like an attempt to make the preferred alternative more appealing to visitors most of whom, according to the NPSs own research Regional Residents Opinions on Management Issues at Point Reyes National Seashore (Responsive Management, 2003), do not come to Point Reyes to look at ranches, which can be seen all over Marin County.

Chapter 2, page 35 Subzoning Framework, Resource Protection Subzone. The DEIS states that the Resource Protection subzone includes lands where no grazing would be authorized to protect park resources, including surface waters & Figures 6 - 31 show that Resource Protection Subzones in many ranch areas do not extend to the edge of the ranches which are near the ocean, Tomales Bay, or Drakes Bay, particularly on Point Reyes National Seashore. Given the high levels of coliform bacteria and nutrients that have been measured in these areas, the NPS should, at a minimum, add a resource protection buffer zone along the entire boundaries of ranches that are close

to surface waters. This will prevent cattle from grazing and defecating near areas where park visitors hike and engage in water sports and where salmon and other fish of importance occur. Also, dairy manure management ponds should be located far away from drainages so that overflow during the rainy season will not discharge to the ocean, as appears to be the case presently. It is unclear from the figures in Appendix 1 if the location of manure ponds are sufficiently far enough away from surface water drainages.

If no grazing is allowed in the Resource Protection subzone, how will this be accomplished? The maps in Appendix 1 show areas that would require many thousands of feet of fencing to prevent cattle from entering these areas. Who would install and pay for all those fences?

Chapter 2, page 35 Subzoning Framework, Range Subzone. This document defines the Range subzone as lands where grazing would be authorized, but more intensive activities would not be allowed because of the documented presence of sensitive resources, including rare plants, wetlands, riparian/stream/pond habitats, forested areas, and critical habitat for threatened and endangered species. Additionally, this subzone includes nearly all areas with slopes greater than 20%. This indicates that under Alternatives B - E, cattle would be allowed to graze, trample on, and defecate in streams, ponds, and endangered species habitats. For the type of lands described here, even grazing should be prohibited. The Range subzone designation should be eliminated and these areas added to the Resource Protection Subzone areas, especially on dairies.

Chapter 3 - Affected Environment, Water Resources, Surface Water Quality Page 67, third paragraph, Surface Water Quality. This section states All dairies operating in the planning area fall under the conditional waiver, which was renewed in 2015 and expires in 2020. A General Waste Discharge Requirements Waiver was adopted in 2016 and dairies will be required to enroll under this general waiver after the current conditional waiver expires. A citation is needed for this statement or possibly a correction, as the San Francisco Regional Water Quality Control Boards website states that conditional waivers were renewed in 2018 and expire October 11, 2023 ([https://www.waterboards.ca.gov/sanfranciscobay/water\\_issues/programs/agriculture/grazing/tomalesgrazing/TomalesBayGrazingWaiver.pdf](https://www.waterboards.ca.gov/sanfranciscobay/water_issues/programs/agriculture/grazing/tomalesgrazing/TomalesBayGrazingWaiver.pdf)): On October 10, 2018 the San Francisco Bay Water Board renewed the Conditional Waiver of Waste Discharge Requirements for Grazing Operations in the Tomales Bay Watershed (2018 Conditional Waiver) for a third, five-year term. The 2018 Conditional Waiver implements the Tomales Bay Pathogens TMDL (Total Maximum Daily Load), the Walker Creek Mercury TMDL, the Tomales Bay Mercury TMDL, the Lagunitas Creek Sediment TMDL, and the Implementation and Enforcement of the Nonpoint Source Pollution Control Program, which requires that all sources of nonpoint source pollution be regulated through Waste Discharge Requirements (WDRs), through waivers of WDRs, or through prohibitions. The Conditional Waiver requires that landowners or operators of grazing operations encompassing 50 acres or more submit a Notice of Intent to comply with the requirements of the Conditional Waiver. Landowners in the Tomales Bay watershed who have not previously enrolled under the 2013 Conditional Waiver and who operate eligible grazing operations as defined in the 2018 Conditional Waiver must meet the following standards (1 and 2 or solely 3): 1. Submit to the Regional Water Board a Notice of Intent to comply with the requirements of the 2018 Conditional Waiver, and 2. Complete a Ranch Water Quality Plan (to be kept onsite); or 3. Submit to the Regional Water Board a Notice of Non-Applicability.

This Waste Discharge Waiver addresses ranches in specific watersheds such as the Tomales Bay Watershed, but most ranches on the Point Reyes National Seashore are not within any watershed included in this regulation. Clarification or correction is needed for the assertion that the Waste Discharge Waivers apply to all dairies in the planning area as only three dairies in the Point Reyes National Seashore (I, L, and J) appear to be at least partially in the area included in the Tomales Bay watershed waiver. Portions of these as well as all other ranches in Point Reyes National Seashore drain to the Pacific Ocean and Drakes Bay, which is not regulated by the Regional Water Quality Control Board. The DEIS states that the NPS regulates discharges from the shoreline to 0.25 miles offshore (Chapter 3, page 66 Water Resources). This document should clarify 1) what the NPS is doing to regulate ranch discharges not included in the Waste Discharge Requirement Waiver which drain to the Pacific Ocean and 2) whether those ranches are complying with equivalent requirements. The Regional Water Quality Control Board Waiver of Waste Discharge Requirements stipulates that a copy of each ranch's Water Quality Plan be kept onsite. Please indicate where onsite these plans are kept and how they may be accessed by the public. The

public should have access to these records since, as discussed on pages 67 - 70 of this DEIS, monitoring data show exceedances of potentially pathogenic bacteria and nutrients all along the coast of Point Reyes National Seashore where visitors like to swim, kayak, and walk the beaches. For Kehoe Drainage, Abbotts Lagoon, and Coastal drainages, the DEIS states that improvements were made to a loafing barn in 2004 and other facilities (no dates given) but high concentrations of pollutants were measured in these areas by Pawley and Lay in 2013, indicating that those actions were not effective. Clearly a more rigorous water quality monitoring program is needed at Point Reyes.

Chapter 2 page 59 - Alternatives considered but Dismissed from Further Analysis Ranch Management - Management of All Park Lands for the Protection, Restoration, and Preservation of Natural Resources: The DEIS states: Commenters suggested NPS should manage all park lands solely for the protection, restoration, and preservation of natural resources. In addition to managing park lands for the protection of natural resources, NPS also must manage cultural resources and provide for visitor use and enjoyment in a manner consistent with applicable legal requirements. Please cite what specific legal requirements this refers to. Preservation of sites of indigenous people certainly must be included along with historic buildings. While ranching at Point Reyes has an historical context, the Pierce Point Ranch provides full access to historic structures and descriptions and photographs of historical ranching. The currently active ranches provide no such opportunities, as most of the historic structures are essentially private property. Visitors cannot walk up to an historic ranch house and ask for a tour and description of the families ancestors and how they lived. All park visitors can see are the beef and dairy operations some of which have modern structures and reflect modern operations and look like the other beef and dairy ranches found throughout Marin County.

This approach was dismissed from further analysis because it would not address impacts on other NPS resources and values that NPS is mandated to consider. This is very vague, please elaborate on what other NPS resources and values this is referring to. Historic structures are included in national register legislation and even historic districts, but operations are not considered historic, especially when they are clearly modern operations.

"Moreover, the action alternatives in this EIS that include ranching would implement activities and mitigation measures to minimize impacts on natural and cultural resources while also protecting them." The proposed zoning does not do enough to protect natural resources and especially surface water from fecal coliform bacteria and nutrients from cattle excrement. It endangers the health of visitors who engage in water activities to allow ranching so close to the ocean. Areas in the proposed Range subzone, which would allow cattle grazing in areas where there are waterways, threatened and endangered species, and slopes greater than 20% should be reclassified as Resource Protection Subzones. This would allow ranching to continue while more effectively mitigating their impacts on visitor safety and enjoyment. Additionally, the no ranching alternative would be similar in nature to an alternative focused on the protection, restoration, and preservation of natural resources on all NPS lands. This sounds like its in line with the purpose of Point Reyes National Seashore when it was created: (16 U.S. Code §/459c.) Point Reyes National Seashore; purposes; authorization for establishment: In order to save and preserve, for purposes of public recreation, benefit, and inspiration, a portion of the diminishing seashore of the United States that remains undeveloped, the Secretary of the Interior (hereinafter referred to as the Secretary) is authorized to take appropriate action in the public interest toward the establishment of the national seashore set forth in section 459c-1 of this title.

Chapter 3, Wildlife, Including Federally Listed Species Federally listed wildlife, Page 77 states that Federally listed marine animals including elephant seals use beaches in the planning area but are not included in the analysis because ranch activities would not affect them. Given the description of pollution in coastal areas of the park pages 66 and 67) scholarly citations are needed to substantiate this statement.

Appendix L - Biological Assessment - National Marine Fisheries Service Section 8.1.4 concludes that adverse effects from ranching would generally be minimized or avoided but would not be insignificant or discountable. Therefore, the proposed action may affect, is likely to adversely affect the CCC coho salmon ESU. This needs to be included in Chapter 3 of the main body of the DEIS and not buried in an appendix. The text does not match



the tables it refers to. The fifth sentence refers to Table J-3 in Appendix J as listing special status wildlife but this table does not include Federally listed wildlife, which are in table J-4. This needs to be corrected.

Fish Coho Salmon are variously referred to as endangered or threatened throughout this document. The National Marine Fisheries Service defines California Central Coast Coho Salmon as Endangered. This DEIS should refer to them in a consistent way.

([https://www.westcoast.fisheries.noaa.gov/protected\\_species/salmon\\_steelhead/salmon\\_and\\_steelhead\\_listings/coho/central\\_california\\_coast\\_coho.html](https://www.westcoast.fisheries.noaa.gov/protected_species/salmon_steelhead/salmon_and_steelhead_listings/coho/central_california_coast_coho.html)).

Page 80 Tule Elk Current Status and Distribution in the Park Reintroduction of this beautiful and iconic animal back to Point Reyes is the jewel in the crown of the Point Reyes Seashore National Park Service. Seeing them is the reason many visitors come to Point Reyes. This section refers to many areas that are not shown any maps, such as Coast Camp, Glenbrook and Muddy Hollow drainages, Glen Camp and several others. For readers of this DEIS, these locations should be shown on Figure 2.

Page 84, Visitor Use, Experience, and Access In addition to the responses about visitor satisfaction in general, this section should also provide the results of specific visitor preferences documented in Regional Residents Opinions of Management Issues at Point Reyes National Seashore Conducted for the Point Reyes National Seashore Association by Responsive Management, 2003) which found that most visitors favor preservation of wildlife habitat and native ecosystems over preserving dairy and beef ranches.

Page 92, Tourism and Travel Point Reyes is a wonderful asset for the National Park Service and the surrounding communities. The \$108.5 million spent in gateway communities as a result of tourism underlines the importance of enhancing visitor experiences. More hiking trails along the pacific coast would greatly enhance the appeal of Point Reyes National Seashore.

Chapter 4: Environmental Consequences Page 102 Corvid Management at Point Reyes National Seashore What is the significance of (Lukenbach) in this subsection title. If a reference, please treat it as such and include a publication date and include in a References Cited section of this DEIS.

Soils Alternative B, Ranch Management, Page 107 - Diversification Ranches at Point Reyes have been designated as Historic. This term is commonly associated with buildings and lands, not operations. The addition of chickens, goats, sheep, and row crops does conform to traditional historic ranching at Point Reyes and should not be allowed. And predation of native wildlife on these new types of wildlife is likely to occur. The National Park Service is already looking bad in the eyes of the public for proposing to shoot Tule Elk. If you start killing other native wildlife there will likely be even more public opposition. Water Resources

Alternative B - Ranch Management page 117 The DEIS states Water quality monitoring would continue as described in chapter 3, and ranch operations in the Tomales Bay watershed and dairies would remain subject to meeting the Conditional Waiver of Waste Discharge Requirements. Chapter 3 of this DEIS provides results of sporadic past water quality monitoring but does not describe a systematic ongoing monitoring program. Also, as described above, most of the ranches are not in the Tomales Bay Watershed and therefore are not covered by the Conditional Waiver of Waste Discharge Requirements - an oversight that needs to be corrected in this DEIS and in practice.

Vegetation, Including Federally Listed Species - Alternative F Page 139, 3rd paragraph - Wouldnt Tule elk grazing partially offset increases in biomass resulting from removing cattle?

Cultural Landscapes, Historic Districts, and Historic Structures page 173 This DEIS says the NPS would explore creating a maintenance account using rental payments from each ranch. This requires more discussion for readers to understand. Who currently pays for maintenance of ranch structures? If the ranchers pay to maintain their buildings, isnt this the equivalent of reducing their already favorable rents? If the NPS already pays for the

maintenance, why are special accounts needed? This looks like an attempt to divert funds away from the Department of Interior and give them to private ranchers.

Alternative B - Public Use and Enjoyment page 167. This section describes strategies and projects to expand the range of visitor opportunities such as adding overnight accommodations and additional hiking and equestrian access using existing roads. These are excellent ways to improve visitor enjoyment of the park but these are things that could have been done years ago without the need for an EIS. An explanation is needed as to why the NPS has not done this already.

Alternative C - Elk Management page 169. This alternative involves eliminating the entire Drakes Bay herd of Tule Elk, which are the elk most visitors look at because they are more accessible and don't involve a long hike like the Tomales Point herd. The assertion that Overall, visitor use and experience would improve compared to existing conditions beggars comprehension. This requires revision or more explanation. Whoever wrote this doesn't understand visitor motivation for visiting Point Reyes National Seashore and has not read the NPS's own research on the subject (Responsive Management, 2003). Alternative F - Public use and enjoyment, page 171. In contrast to Alternative C, this discussion acknowledges the importance of Tule Elk viewing to park visitors. As discussed in Regional Residents Opinions of Management Issues at Point Reyes National Seashore Conducted for the Point Reyes National Seashore Association by Responsive Management, 2003), park visitors ranked wildlife habitat and natural ecosystems as far more desirable than dairy and beef ranches. The text also says visitors would not have opportunities to see historical ranching, but current ranching does not conform to historical practices and the Pierce Point Ranch beautifully documents and allows access to historical ranch structures and history.

Socioeconomics, page 175. This section only addresses Population, Employment, Income and Sales as they apply to dairy and beef operations and does not account for socioeconomic benefits from visitors to Point Reyes, estimated at \$108 million for gateway communities. Its apparent assumption that visitors to Point Reyes National Seashore will remain the same under all alternatives is unproven and potentially false. If more trails, campsites, wilderness and Tule elk viewing, and overnight accommodations are made available, visitors could increase.

Air Quality, page 185. Alternative F - the summary of air quality impacts from Alternative F says beneficial compared to existing conditions, which is a huge understatement given that it would yield a 100% reduction in emissions from ranches at Point Reyes. This statement needs to be corrected in this DEIS.

Chapter 4 Summary This DEIS does not provide a summary of findings but as I look over this Chapter on Environmental Consequences the general sense for the areas discussed are that most would benefit from cessation of ranching:

Soils: Alternative F would be most beneficial due to the cessation of ranching

Water Resources Alternative F would be an improvement over current conditions and presumably other alternatives due to removal of ranching and associated manure production and associated surface water pollution.

Vegetation, Including Federally Listed Species - all alternatives have positive and adverse impacts

Wildlife, Including Federally Listed Species - all alternatives have positive and adverse impacts

Visitor Use, Experience, and Access Alternative F - the DEIS says this alternative is an improvement over existing conditions due to expanded opportunities, location and type of visitor experiences, but less opportunities to see ranching (text says historical ranching, but current ranching does not conform to historical practices). Most visitors don't come to see the ranches. This section needs to be revised to reflect the results of NPS's own research.

Cultural Landscapes, Historic Districts, and Historic Structures - page 171 the DEIS states that diversification could result in long term beneficial impacts because the Secretary's standards would be followed but changing the

land use is not consistent with preservation of historical land use. This erroneous statement should be stricken from this document.

Socioeconomics (Page 175) - the DEIS only evaluates the effects of ranching and assumes visitor spending (which is much greater) will not change. This is an incorrect assumption and a complete assessment of all socioeconomic drivers needs to be conducted.

Air Quality (Page 185) Alternative F - (no ranching) 100% elimination of emissions from ranches is most beneficial. The incomplete analysis of socioeconomics makes it hard to fully assess all alternatives, but the existing analysis indicates that alternative F benefits most of the categories assessed.

Appendix D - Management Activity Standards and Mitigation Measures, Table D-1 The management activities described in Table D-1 are generic as are the associated NRCS practices. It is not clear where and how these measures will be applied, please include additional detail in this appendix.

Appendix L - Biological Assessment - National Marine Fisheries Service. This biological assessment was prepared by the National Park Service for the National Marine Fisheries Service but it is not clear whether the NMFS has read and reviewed this document. Section 2.0 says There have been no recent consultations with NMFS regarding the proposed action. The NMFS needs to review this document before it is submitted for consideration in this DEIS. Section 3.27 Dairy operations, page 7 This section states The six organic dairies manage their beef grazing operations differently from the ranches. This suggests that dairies have beef and dairy cattle. Please correct this or explain how dairies are different from ranches and whether they also have beef cattle. Table 3-1 pages 8-12 has the same deficiencies as Table 1 in Chapter 2. Table 7-1 page 35. The creeks listed in this table are not shown on any figures. They should be shown on at least one figure for a complete reader understanding of this table and accompanying text. Please add this to the Figures. Table 7-2 page 36 and Table 9-1 page 49. The California Coastal Coho salmon are considered threatened by the NMFS. Section 7.5 Water Quality in the Action Area page 39. The water quality data presented here are all over 10 years old. More recent water quality data are needed in order to fully assess the impacts of the ranches on surface water. More current data should be collected and analyzed before impacts of ranches can be fully assessed and these studies should be completed before this DEIS is finalized. Section 8.1.1.1 Page 44 - second paragraph states In spite of the above described potential adverse effects of livestock on coho salmon, the actual effects are likely far reduced from those noted for the following reasons& followed by reference to Grazing Plan Recommendations (Aoyama, 2018) which are not included in the description of alternatives in Chapter 2.

#6711

Name: Sreedharane , Radha

Correspondence: I am writing to urge the National Park Service to discontinue the grazing of beef and dairy cattle at Point Reyes National Seashore. This precious area has been damaged by livestock grazing which poses a threat to the environment and local wildlife and it should be protected and used to serve the public good, and not for the benefit of the livestock industry.

I strongly oppose Option B and any other proposal that would be fatal to Tule Elk or other wildlife to the benefit of ranching operations, and encourage the agency to adopt Option F to discontinue grazing and allow members of the public to enjoy this beautiful park and to be enriched with opportunities to visit and appreciate this special place.

#6712

Name: Yancy, Vennie

Correspondence: To our National Park Service, There is clear scientific consensus that livestock agriculture heavily impacts our environment, ergo climate change. How in California, Marin, West Marin no less, can cattle still be allowed to graze on our National Parks? You are going backwards, as if you're not in touch with the real

world. Proposing the killing of Tule Elk is insane. Let natural predators do that. The predators who can't thrive with cattle present. Heck, the ranchers will shoot the mountain lions if they go after a cow. Or the bobcats and foxes who come after chickens. There's nothing historical about the ranchers which became supersized after 1962. The ranchers were paid, now they graze cattle at half the going price. The reality is the Park Service has failed to do their job. The death of 250 Tule Elk a few years ago from dehydration, horrible deaths, shows that. Jarred Huffman is also failing by supporting the plan to allow this travesty of livestock on the Parklands.. Phase out the cattle. No, do not allow additional livestock to be raised there. No do not 'cull' the rare Tule Elk. You KNOW what the results environmentally are of cattle and livestock, just say NO. Vennie Yancy

#6713

Name: yadanza, maria

Correspondence: Please do NOT allow cattle to graze on public land.

#6714

Name: Lind, Patricia

Correspondence: I do not believe we should kill native wildlife for the benefit of non native livestock. I oppose open range for livestock. Our public lands have been given away to cattle and livestock farmers and much damage has been done to native flora and fauna. Our watersheds have suffered due to cattle and non native specie grazing, riverbeds are trampled, siltation of creeks and small tributaries as well as manor in our headwaters. Elk need to be left alone they are native and have a right to be there. If you believe their numbers are too high please use natural predation and reintroduce the wolves. I expect the planners and managers of our natural parks to adhere to natures way of managing the forests and grasslands and stop use of unnatural means. We have caused extinction of so many species due to use of unnatural management and now have taken the most diverse conifer forests system that is well adapted to fire ecology and turned it into a tree farm with one specie of same age densely planted trees that erupt into tree fire once natural ground fire goes through. These stands are never thinned. We need to use natural rejuvenation and increase rotation age to over 120 yrs to have fire resistant forests again.

#6715

Name: N/A, N/A

Correspondence: I am writing to urge the National Park Service to discontinue the grazing of beef and dairy cattle at Point Reyes National Seashore. This precious area has been damaged by livestock grazing which poses a threat to the environment and local wildlife and it should be protected and used to serve the public good, and not for the benefit of the livestock industry.

I strongly oppose Option B and any other proposal that would be fatal to Tule Elk or other wildlife to the benefit of ranching operations, and encourage the agency to adopt Option F to discontinue grazing and allow members of the public to enjoy this beautiful park and to be enriched with opportunities to visit and appreciate this special place. Protect the elk!

#6716

Name: Tang, Maggie

Correspondence: I am writing to urge the National Park Service to discontinue the grazing of beef and dairy cattle at Point Reyes National Seashore. This precious area has been damaged by livestock grazing which poses a threat to the environment and local wildlife and it should be protected and used to serve the public good, and not for the benefit of the livestock industry.

I strongly oppose Option B and any other proposal that would be fatal to Tule Elk or other wildlife to the benefit of ranching operations, and encourage the agency to adopt Option F to discontinue grazing and allow members of

the public to enjoy this beautiful park and to be enriched with opportunities to visit and appreciate this special place.

#6717

Name: Lifton, Sherry

Correspondence: Regarding the EIS, I support Alternative Elk for the following reasons:

1. The Tule Elk need to be protected. These beautiful creatures live in very few places and thrive at Point Reyes National Seashore, where tourists travel from all over the globe to see the Tule Elk. Their grazing patterns are in sync with the habitat and ecosystems of Point Reyes National Seashore. Wildlife belong in a National Park and it is the joint responsibility of the public and the park service to protect the wildlife who live there, especially the Tule Elk. Cows who live on dairy and cattle ranches can be viewed all over the state and country. Tourists come for the Tule Elk, not the cows.

2. Animal agriculture has been inextricably linked as a leading cause of climate change. For a national park to encourage and support an industry responsible for so much environmental damage would be in direct contradiction to the national park service mission. The animal agriculture ranches at Point Reyes national seashore have been shown in environmental studies to produce a whopping 60% of greenhouse gas emissions at Point Reyes seashore. Additionally, the runoff from the cattle and dairy ranches have been a significant cause of water pollution at Point Reyes National Seashore. Alternative F would promote conservation, clean water, and environmental restoration as opposed to the continued damage of the land and water.

3. The ranches have directly caused soil erosion, e. coli contamination, destruction of native plant species, the obliteration of green grass in some areas, and complete alteration of sensitive ecosystems that need protection. The introduction of invasive plant species and other wildlife animals has further altered a very special and beautiful place that needs to be protected.

4. Placing for-profit business at the expense of the natural environment and wildlife seems to be the opposite path for a national park. The ranchers have already been compensated for the land with the explicit understanding that the government can utilize the land and water for a national park.

I support Alternative F because the ecosystems, plants, water, and wildlife should take priority over private industry in our national parks.

Thank you, Sherry Lifton

#6718

Name: Rosetti, Eva

Correspondence: Please respect the wildlife in Point Eeyes and do them No harm

#6719

Name: N/A, Terry

Correspondence: I am writing to urge the National Park Service to discontinue the grazing of beef and dairy cattle at Point Reyes National Seashore. This precious area has been damaged by livestock grazing which poses a threat to the environment and local wildlife and it should be protected and used to serve the public good, and not for the benefit of the livestock industry.

I strongly oppose Option B and any other proposal that would be fatal to Tule Elk or other wildlife to the benefit of ranching operations, and encourage the agency to adopt Option F to discontinue grazing and allow members of

the public to enjoy this beautiful park and to be enriched with opportunities to visit and appreciate this special place.

#6720

Name: Hermanson, Johanna

Correspondence: I am writing to urge the National Park Service to discontinue the grazing of beef and dairy cattle at Point Reyes National Seashore. This precious area has been damaged by livestock grazing which poses a threat to the environment and local wildlife and it should be protected and used to serve the public good, and not for the benefit of the livestock industry.

I strongly oppose Option B and any other proposal that would be fatal to Tule Elk or other wildlife to the benefit of ranching operations, and encourage the agency to adopt Option F to discontinue grazing and allow members of the public to enjoy this beautiful park and to be enriched with opportunities to visit and appreciate this special place.

#6721

Name: Mueller, Kristen

Correspondence: I am writing to urge the National Park Service to discontinue the grazing of beef and dairy cattle at Point Reyes National Seashore. This precious area has been damaged by livestock grazing which poses a threat to the environment and local wildlife and it should be protected and used to serve the public good, and not for the benefit of the livestock industry.

I strongly oppose Option B and any other proposal that would be fatal to Tule Elk or other wildlife to the benefit of ranching operations, and encourage the agency to adopt Option F to discontinue grazing and allow members of the public to enjoy this beautiful park and to be enriched with opportunities to visit and appreciate this special place.

#6722

Name: Bass , Lisa

Correspondence: allow this precious land to remain as wildlife habitat and to be used for the public good, not for the benefit of the livestock industry.

#6723

Name: fuller, douglas

Correspondence: Talking points:

\*I support Alternative F, phasing out cattle and dairy industry and returning the land to its natural state. The enabling legislation of the National Seashore supports wildlife protection and does not mention upholding private industry. The original leases to ranchers were to be 25 years. Ranchers have already been paid handsomely for their land, so it is long overdue to phase out the ranches. "Cultural Resource" and "Historic" does not mean industry needs to be currently in operation.

\*Private business has no place on public land. Allowing industry and ranches to diversify their business is a bad idea. Already these ranches have been negatively impacting the land, mismanaged to allow soil erosion, scarring in the landscape, e.coli contamination in waterways and more. If you allow EVEN MORE agricultural practices on the seashore, there is no way to know the impact and there is no historical evidence you will be able to manage any negative impacts on the environment.

\*Tule Elk should be protected for the survival of their species. They have already gone through a huge genetic bottle neck when they were almost completely wiped out except for 20 individuals. Every gene allele is important for the long term sustainability of the herd. The National Park should be protecting all Tule Elk, and allowing new herds to form and to TAKE DOWN THE FENCE at Pierce Point and allow all Tule Elk to roam free.

\*I do not support granting 20 year leases to cattle and dairy industry. Climate science has indicated we have less than 12 years to mitigate the worst of climate catastrophe. Allowing business that has been linked to water pollution, species extinction and in Point Reyes is the culprit of over 60% of the greenhouse gas emissions, it is not a good idea to give that same industry a 20-year lease to continue degrading our national park. Point Reyes is a refuge to thousands of plants and animals. Point Reyes can be a leader in the fight for climate justice, and it starts with phasing out Beef and Dairy operations and restoring the land to its natural state. The EIS has NO MENTION of the effects of climate change in it, and does not include any information of the cattle and dairy's impact on climate change within the park.

#6724

Name: Sullivan, Susan

Correspondence: It is unconscionable that public lands, which belong to the public of the United States, let private corporations and private citizens pay to use our lands. They abuse the land, making it unfit for its real use which is to grow and allow creatures of the world to gain sustenance and nourishment from it. And to make people aware of the real possession we have in stewarding the land, not abusing it. It is a shame in this country that money speaks louder than good deeds and caring for all creatures and living things on this earth.

#6725

Name: Gibson, Kenneth

Correspondence: Point Reyes National Seashore and surrounding public lands are one of the features of the San Francisco Bay Area that I, and my family and friends, have enjoyed since I came to live in the area in 1973. What is most stirring in such places is what is unusual to most of us - the view of undisturbed nature. There is nothing more stirring than seeing an animal rarely seen - tule elk, a wolf, a mountain lion. Cattle we see plenty of.

Cattle grazing along a ridge framing a California view of the Pacific Ocean is a disruption. The natural tule elk, in such view are a vision of the new world.

According to the EIS (and common sense) continued cattle ranching in the Seashore area, is detrimental to the natural life of the area and the tule elk in particular. These are the natural resources that the National Parks Service governing law requires it to protect. The National Parks Service must reject any expansion or continuation of any cattle ranching in the Seashore or nearby areas governed by the Park Service.

#6726

Name: N/A, N/A

Correspondence: I am writing to urge the National Park Service to discontinue the grazing of beef and dairy cattle at Point Reyes National Seashore. This precious area has been damaged by livestock grazing which poses a threat to the environment and local wildlife and it should be protected and used to serve the public good, and not for the benefit of the livestock industry.

I strongly oppose Option B and any other proposal that would be fatal to Tule Elk or other wildlife to the benefit of ranching operations, and encourage the agency to adopt Option F to discontinue grazing and allow members of the public to enjoy this beautiful park and to be enriched with opportunities to visit and appreciate this special place.

#6727

Name: Hieronimus, Jill

Correspondence: The Tule Elk matter. With loss of biodiversity - any species we can save from annihilation, the better for the ecosystems they are native to. I choose action "f" as a life long animal activist, let's start making saving species our priority, not cattle ranching in Ca or elsewhere.

Dr. Zohara M. Hieronimus [www.21stcenturyradio.com](http://www.21stcenturyradio.com)

#6728

Name: Ferraz, Mark

Correspondence: I am writing to urge the National Park Service to discontinue the grazing of beef and dairy cattle at Point Reyes National Seashore. This precious area has been damaged by livestock grazing which poses a threat to the environment and local wildlife and it should be protected and used to serve the public good, and not for the benefit of the livestock industry.

I strongly oppose Option B and any other proposal that would be fatal to Tule Elk or other wildlife to the benefit of ranching operations, and encourage the agency to adopt Option F to discontinue grazing and allow members of the public to enjoy this beautiful park and to be enriched with opportunities to visit and appreciate this special place.

#6729

Name: Williams, Marta

Correspondence: you assume that there is substantial public support for this option to remove the elk. there is not. you need to quantify the public will on this issue. you also assume that cattle will not harm the environment. you could not be more wrong. elk are adapted to the ecology cattle are not. western watersheds has proven without a doubt that cattle damage native vegetation and natural watersheds. so why would you even consider giving this land over to cattle . it is irresponsible.

there also needs to be an analysis of who will benefit monetarily from this. that fact is hidden now from the public. and are there any links between park service staff and ranchers? if so there is collusion that needs to be addressed

there is also a question of what the public will be paying for the desecration of public land.where is that analysis?

#6730

Name: Bobis, Kathleen

Correspondence: I am writing to urge the National Park Service to discontinue the grazing of beef and dairy cattle at Point Reyes National Seashore. This precious area has been damaged by livestock grazing which poses a threat to the environment and local wildlife and it should be protected and used to serve the public good, and not for the benefit of the livestock industry.

I strongly oppose Option B and any other proposal that would be fatal to Tule Elk or other wildlife to the benefit of ranching operations, and encourage the agency to adopt Option F to discontinue grazing and allow members of the public to enjoy this beautiful park and to be enriched with opportunities to visit and appreciate this special place.

#6731

Name: Ashe, Amy



Correspondence: I do not support endangering native flora and fauna to support cattle ranching. Please find another solution that does not endanger the elk and other wildlife.

#6732

Name: Gallup, Holly

Correspondence: It's really sad that cattle (being raised for beef) are grazing on public land and causing other species to be pushed out or killed. Beef is not sustainable. There are lots of meat alternatives available now, especially in California. Cattle grazing for beef is also causing the destruction of the Amazon Rain Forest. This is destroying our planet.

Please stop allowing ranchers to continue this destruction.

#6733

Name: Sisco, MJ

Correspondence: I am writing to urge the National Park Service to discontinue the grazing of beef and dairy cattle at Point Reyes National Seashore. This precious area has been damaged by livestock grazing which poses a threat to the environment and local wildlife and it should be protected and used to serve the public good, and not for the benefit of the livestock industry.

I strongly oppose Option B and any other proposal that would be fatal to Tule Elk or other wildlife to the benefit of ranching operations, and encourage the agency to adopt Option F to discontinue grazing and allow members of the public to enjoy this beautiful park and to be enriched with opportunities to visit and appreciate this special place.

#6734

Name: Myles, Carol

Correspondence: In the Impact Amendment, there are several mentions of 'lethal removal' of a certain number of Tule Elk. The term lethal removal was not defined. Years ago, when Axis and Fallow deer were removed from the park, I understand that the animals were shot from a helicopter and left where they were shot. I would like to think that there are more humane methods now.

One option that comes to mind is to allow hunters to be allowed to harvest the elk for a fee. Guided hunts would allow the guide to control where they hunt and what animals are taken. Hunters pay large sums of money per animal for a guided hunt. That money could certainly be a benefit to the park. For example, a quick search online revealed that there are businesses providing guided tule elk hunts in California. One business, Oak Stone Outfitters ([www.oakstoneoutfitters.com/california-tule-elk-hunting/](http://www.oakstoneoutfitters.com/california-tule-elk-hunting/)) manages private ranches for tule elk hunting. Their hunting packages (including room and board for the length of the hunt) range from \$5000 to \$38,000 per hunt.

Another option to consider is to eliminate lethal removal and relocate the unwanted elk to areas where they could join an elk herd in another part of the state. Also, since this herd started from two bulls and eight cows from an Wildlife Refuge, perhaps there are Wildlife Refuges that would happily accept groups of elk to start or add to their own herds.

Thank you.

#6735

Name: Tanikella, Ajay

Correspondence: Please use Alternative F, which would discontinue farming and ranching opportunities in the park and expand visitor opportunities.

The preservation of native wild species must take precedence over farming and ranching activities.

Grazing negatively affects ecosystems, causing water pollution and soil erosion, spreading invasive species and disease, and harming endangered species.

#6736

Name: Kline, Matthew

Correspondence: We must recognize that local decisions are not limited to localized or isolated regional reactions, but in fact have the potential for tremendous impacts on a global scale. If we cannot restore Point Reyes National Seashore into the park it was once promised to be and fulfill its potential, then I fear we have little hope in turning the tide against the numerous environmental issues confronting us now and those issues surely to emerge going forward.

It is true that we face an overwhelming amount of environmental problems unlike ever before, from the Climate Crisis and mass biodiversity loss, to ocean acidification and coral reef bleaching - habitat fragmentation, melting glaciers, toxic algal blooms, soil infertility, animal agriculture, over-antibiotic use in animal agriculture, superbugs, invasive species, shifting weather patterns, fish stock depletion, aquifer reduction, unprecedented fire seasons and hurricane strength, freshwater resource diminishment, bird migration routes changing, insect populations disappearing - the list goes on and on and is extremely long to say the least. Make no mistake, these environmental problems are often complex and interconnected, and they are deeply rooted in an Anthropocentric mindset that sees the human not as part of nature, but separate from it. Unless we take immediate substantive steps to prioritize our environment instead of devalue and diminish it, current and future generations will suffer the negative consequences of a far reaching ignorance and neglect. Perhaps one the greatest threats facing all of us today is Shifting Baseline Syndrome. This concept, when applied to the natural world, was first considered by scientist Daniel Pauly regarding his work on fisheries management. Pauly described how fisheries scientists sometimes failed to identify the correct baseline population size (for example how abundant the population of a fish species was before human exploitation) and thus were working with a shifted baseline. Pauly went on describing how radically depleted fisheries were evaluated by experts who used the state of the fishery at the start of their careers as the baseline, rather than the fishery in its untouched state. Areas that swarmed with a particular species hundreds of years ago, may have experienced long term decline, but it is the level of decades previously that is considered the appropriate reference point for current populations. In this way large declines in ecosystems or species over long periods of time were, and are, masked. This would in turn result in the loss of perception of change that occurs when each generation redefines what is natural. What is actually natural out in Point Reyes National Seashore (or PRNS for short) has nothing to do with ranching or animal agriculture. Some would even have you believe that Tule Elk never existed in PRNS. Believe me, Ive heard it with my own ears, the Tule Elk arent native, they were introduced. Shifting Baseline Syndrome has found a foothold in far too many minds and this in turn has had and continues to have a devastating impact on our interconnected natural world. Upon attending yet another general management plan meeting (if you can call it that) I actually heard one rancher say to his friends, What do they want to do with our land now? This way of thinking is as ignorant as it is shortsighted.

The ranchers have been paid. They have been subsidized (and continue to be). They have been given passes on environmental reviews for decades. They have harmed fragile ecosystems and prevented healthy wildlife populations. They have pressured politicians to shoot native wildlife, like the Tule Elk, and prevented recreational opportunities and access. Time and time again, multiple generations of ranch families in the PRNS have benefited while our environmental health and biodiversity have been neglected. For decades now we have waited. The majority of public input has anxiously called for relief. Believe it or not, this issue is far bigger than the ranches though, this is about our public land and the promise of a better tomorrow for our seashore. While humans continue our overpopulation, constant consumption and unsustainable processes, it is past time, that we do

everything we can to prioritize environmental health and the biodiversity that still remains throughout the entire National Park System. Let us earnestly begin this process right here at home in our National Seashore.

The Point Reyes National Seashore's own website actually states as wild land habitat is lost elsewhere in California, the relevance of the Point Reyes Peninsula increases as a protected area with notable rich biological diversity. There are over 50 threatened, rare, or endangered species located in PRNS, nevertheless these species and the unique habitats in which they are found are not prioritized over cattle. Why? I believe the answer is rather straightforward, flora and fauna do not vote nor do they donate money. Meanwhile, agricultural interests are powerful and have way more influence on our elected politicians and appointed officials. That being said, nature does indeed bring in the most money by far and is indeed the #1 reason tourists visit the park, not animal agriculture. In fact over \$132 million dollars was attributed to tourism at PRNS in 2017. Tourism is far more profitable and economically viable, as well as environmentally sustainable and safe compared to agriculture in our National Seashore. When we set up a table outside the Bear Valley Visitor Center back on one particular Saturday in early September for just a few hours, visitors overwhelmingly told us that they came to their National Seashore to see wildlife, not cows. Many visitors admitted that before they even arrived in PRNS, the hillsides they passed and roadsides they traveled on were already full of cattle. Nearby Marin Agricultural Land Trust properties already cover thousands and thousands of acres - over 50,000 acres to be exact. Over half of all land in Marin County, 167,000 acres, is farm and ranch land already. The absolute last thing we need is ranching and farming inside our critically important seashore. During the few hours we were set up at the visitor center we also asked another question - do you favor the Park Services proposed plan to kill our native Tule Elk? Visitors and locals alike responded by a count of 145 to 0 against this proposed plan. It was clear to us and those we talked to - prioritize biodiversity and environmental health in our publicly owned seashore!

A National Park should not be the place we experiment with and look into ways to create a new model for how ranches and dairies should operate (as one biologist put it to me at a meeting). Let private agricultural interests outside of our fragile and important National Seashore learn to create a new model. This drastically needed to already happen (yesterday). To reiterate, do not prioritize the creation of a new ranching model in some of the very last sanctuaries set aside in critically important and strategic locations. PRNS should be discussing and prioritizing the restoration of severely diminished coastal prairies, dunes, wetlands, and riparian areas, and improving the overall health and well being of native populations of flora and fauna. PRNS should be a model for environmental conservation not private taxpayer subsidized environmental degradation. A new ranchland zone will only further exacerbate the problem, allowing destructive forms of land use to prevail in a biodiversity hotspot, that is indeed actually still waiting to live up to its full potential.

This past year the United Nations released a deeply distressing report compiled by nearly 150 authors from 50 nations. Together they worked for 3 years as part of the Intergovernmental Science-Policy Platform on Biodiversity and Ecosystem Services - a panel with 132 member nations, including the United States. Representatives of each member nation signed off on the reports findings and the authors of the report urged dramatic action, for Nature is declining globally at rates unprecedented in human history - and the rate of species extinctions is accelerating, with grave impacts on people around the world. The report also tells us that it is not too late to make a difference, but only if we start now [yesterday] at every level from local to global. Through transformative change nature can still be conserved, restored, and used sustainably - this is also key to meeting most other global goals. By transformative change, we mean fundamental, system-wide reorganization across technological, economic, and social factors, including paradigms, goals and values the report stated.

Two days ago, many prominent newspapers and media outlets reported on a new extensive study published in Science. The study revealed a 27% drop in the North American bird population in just the last 49 years. A majority of the 529 bird species studied experienced population loss, even species we tend to think of as abundant, such as warblers and blackbirds. We were stunned by the result - it's just staggering, said Kenneth V. Rosenberg, a conservation scientist at Cornell University and the lead author of the study. Rosenberg goes on to say the magnitude of the decline could significantly affect the continent's food webs and ecosystems. We're talking about pest control, we're talking about pollination [and] seed dispersal [and] we can be pretty sure that other parts of the ecosystem are also in decline and degradation.

I cannot help but think of the Western Snowy Plover and the enormous negative impacts ranching has on this bird. I cannot forget the Swainsons hawk nor the Willow flycatcher and Tricolored Blackbird.

The PRNSs website features another quote that I think is quite prudent, especially given the current proposal by the Park Service. In 1995 (almost 25 years ago) the National Academy of Sciences reported that: In recent years, it has become apparent that human activities are causing the loss of biological diversity at an increasing rate: the current rate of extinctions appears to be among the highest in the fossil record. Although non-human organisms can cause extinctions of other species to a small degree, no other organisms produce such large effects over such wide areas as humans do and have done-at least locally-for thousands of years. Habitat alteration and degradation are probably the most severe effects humans have on other species today. How can one not consider the enormous negative impacts ranching continues to have on the well being of our National Seashore? Recently fires have raged across Brazil once again, and fortunately mainstream media delved deeper into the issue. The current strong anti-environmentalists controlled government of Brazil would have you believe that these fires are natural, when in reality, they are not. According to the Science Director of the Brazilian Institute of Environmental Research in Amazonia these were not wildfires, but rather fires set by people seeking to create cattle ranches, intentionally ignited during the dry season each year. A Senior Geographer at the Rainforest Foundation said, because cattle require open spaces to feed and grow, ranchers clear vast lands by burning forests& Although logging (both legal and illegal) and other activities also drive deforestation in the Amazon, animal agriculture is the leading cause by far. The World Bank reported that cattle ranching occupies 80% of all converted lands in the Amazon rainforest. I listened to the American politicians espouse their environmental records and call for more regulation, oversight and an end to the fires in the Amazon. Nevertheless some of these same politicians continue to ignore the very corrupt policies that diminish our environment and biodiversity right here at home. We need to connect the dots& the Amazon rainforest is burning because of animal agriculture. The same forces at work down in Brazil are at actually at work here in the United States. This is not just unsustainable, it is a leading cause of species endangerment and ecosystem collapse. The health of our public lands are being sacrificed for private profit at the expense of our environment, our water, our air, our soil and so much more. While biodiversity continues to decline at a rapid pace, many of the species we could help in PRNS are being neglected and conveniently ignored. Another perspective to consider: There are 94 million 400 thousand cattle spread out across the United States of America! There are 5 million 125 thousand cattle scattered across California! These statistics are directly from the United States Department of Agriculture. Yet, there are only an estimated 5,200 native Tule Elk left in the world. This endemic umbrella species has already faced the grips of extinction once before. They are not the problem! There are less Tule Elk in our PRNS than there are cattle, simply put, this is wrong. Is there no room left for our iconic wildlife in our last critically important sanctuaries? 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. These words are directly taken from the Point Reyes National Seashore website.

Personally, I have a very deep connection with the Tule Elk of Point Reyes National Seashore. There are likely few people that have spent as much time with these animals as I have over the last decade. I mention this not for attention but rather so you know that this issue is indeed very personal for me. I believe the Tule Elk are a conservation emblem. Their close call with extinction is a story full of tragedy, resilience and hope. Their story has become part of my story and I want nothing more than to see them thrive and return to what is left of our wild areas in California so that they can make these places more whole again. I along with many others believe they can help restore our California Coastal Prairie - the most species rich grassland in North America. Cattle do not, I repeat do not, have the same impact as Tule Elk on our native grasslands - it is critical that science is utilized when forming policy in our National Seashore, not paid for made up myths.

As a photographer and cameraman who has worked in-depth on a wide variety of natural history and conservation projects throughout North America and Northern Europe, I have had quite the eye opening opportunity to witness and observe our planets spectacular wildlife while immersed in our changing natural world. Throughout the course of my work, I have seen firsthand the diminishment of our natural world. My colleagues and I have travelled far and wide and worked alongside some of the brightest and most active

individuals and institutions working to save our natural world. We have seen firsthand the reality of this Climate Crisis, the massive biodiversity loss, the ocean pollution and so much more. We have been privileged to work in an incredible and challenging field that is full of surprises, but when it comes to our responsibilities to share what we have learned along the way, we do not take this lightly.

I think it is clear that I am deeply discouraged by the Park Services preferred Alternative B plan. Those who visit the seashore cannot stand the continued deterioration of the natural resources of this park and the ongoing diminishment of the biological integrity that is still left waiting in the wings. Alternative B is a disastrous choice that gives preference to 18 beef and 6 dairy ranches. This is unacceptable.

Unfortunately some archaic thinking still persists in our wonderful seashore and at this moment in time, it is quite prevalent in the decision making process. If these wise words from ecologist George Wuerthner do not put things in perspective then I am not sure what will: Think about all the beautiful redwood parks scattered up and down California's coast. Nearly all of these parklands were created by purchasing the land from private property owners, just like we the public bought the ranches that remain in Point Reyes National Seashore. Now imagine that the previous landowners not only refused to leave our redwood parks but continue to cut down redwoods even after we bought the land and the trees for preservation. That is precisely what is going on in Point Reyes National Seashore... Would [our Congressman] Huffman be outraged if loggers were cutting trees in Muir Woods National Monument or Humboldt Redwood State Park, or Redwoods National and State Parks? I would hope so.

Two days ago my wife and I marched alongside 40,000 people in San Francisco as part of the youth led Global Climate Strike. Together, millions of other concerned and informed citizens of the world, people from all walks of life, stood in solidarity and spoke up for prioritizing environmental health and biodiversity around our planet. While we were sacrificing our own time to speak up for the native Tule Elk and the restoration of PRNS, I could not help but think of the millions of young people who were there trying to bring more awareness to these profound environmental issues. What does it say to our youth&let alone anyone out there, including my wife and I, who have individually made sacrifices to our everyday lives, when our National Park Service fails to do the right thing? What does it say to the individuals out there trying to make their own contributions to a better world (through diet, consumption, sustainable living, etc.) when the National Park Service has the opportunity to make a much greater more positive impact than any single one of us, and chooses to go the other way? We must protect our last wild spaces at all cost and this must be the highest mission of our National Parks.

After spending years trying to move to Marin County, my wife and I finally made our dreams come true. Although we were both born and raised elsewhere in the San Francisco Bay Area, it is West Marin that we hope to never leave. We love the small town feel and we value our proximity to open parks and wilder spaces. We love the environmental awareness of many of the people here and their progressive attitudes towards social and cultural issues. We love the natural world that still lingers, like the wildlife that visit us in our backyard and the others we see out on our regular ventures. We do not take for granted our home, far from it, we desire nothing but the best for it and set our expectations very high. This is why I am unwilling to accept the status quo. Enough is enough with the environmental degradation and diminishment of our natural resources. We must unite behind the science and take pride in learning to take care of our environment. We cannot tackle the many environmental issues that face us if we cannot first take care of the enormous ones at home. Point Reyes National Seashore should prioritize environmental health and biodiversity first and foremost. It is our National Seashore. Why would anyone prefer a sad representation of our home instead of a reflection of our best and most promising values! I cannot in good conscience recommend any Alternative other than Alternative F. I strongly implore the National Park Service to adopt Alternative F for the Update to the National Seashores General Management Plan.

Now for further substance:

Neither the Organic Act of 1916 nor the legislation establishing the Point Reyes Seashore, (16 USC Sec 459c) includes language that commits the NPS to ensure the commercial success of private businesses operating in national parks. Leasing the land for ranching at Point Reyes National Seashore is discretionary. Nothing in the legislative record of the Seashore supports the myth of ranching in perpetuity. Specifically stated is that the land

should be unimpaired for future generations and that uses be supportive of the maximum protection, restoration, and preservation of the natural environment within the area (16USC Sec. 459c (6)(a)). Ranching, as conducted at the Point Reyes National Seashore and GGNRA, undermines this mandate.

1. Not discussed in GMPA/EIS: How and when will the NPS set goals for the maximum protection, restoration, and preservation of the Seashore and how will progress be measured? What is the timeframe for meeting them? What new or additional management methods will NPS implement to ensure the maximum protection, restoration, and preservation of the Seashore, per its legislative mandate? What are the costs of attaining maximum protection, restoration, and preservation and what resources has NPS allocated for this purpose?

The GMPA/EIS discusses the many and various environmental impacts of ranching to the Seashore but fails to rate the intensity of these impacts. The public can only guess at the significance of these documented impacts but has no way to know if these impacts are low, moderate or high.

2. Not described in GMPA/EIS: In addition to describing the environmental impacts of ranching to park resources, how does NPS rate those impacts? How will these impacts be mitigated and at what cost?

The economic benefits described in the GMPA/EIS point to a relatively small economic return to the County from the Seashore ranches. It cites the potential loss of fewer than 100 jobs should ranching end.

3. There is no mention in the GMPA/EIS of the working conditions of ranch workers or the notoriously sub-standard housing conditions of workers in the Seashore. Under Alternative B, how will the NPS oversee and improve the working and living conditions for ranch workers? What standards currently exist and how are they maintained?

Ranching is one of many resources listed in the NPSs 2019 draft Foundation Document for the Seashore. More than other historic, cultural or natural resources, ranching has been enshrined in the park, and unquestionably consumes park funds and staff resources that could address the Seashores many unmet needs.

4. The GMPA/EIS does not provide the costs of supporting the ranches, nor the proportion of the budget/staff dedicated to ranching relative to other park resources described in the Foundation Document, which include wilderness, coastal landscapes, marine, estuarine and freshwater environments, diverse habitats and native species, maritime cultural landscapes, continuum of human use (including ranching), opportunities for inspiration and recreation and science and learning. Such analyses are pertinent to the economic impact of increasing support for ranching at the expense of other unmet needs identified for funding.

The NPS has generously subsidized ranches for decades citing its mandate to preserve historic and cultural resources. In fact, ranching as practiced at the Seashore today bears little resemblance to historical ranching. The NPS has never interpreted the working ranches in the park for park visitors. In fact, the public is unwelcome on ranchlands that we, the public, own. The National Register of Historic Places now includes Seashore ranches. Noteworthy is that the National Register does not require active ranching-let alone on any commercial or industrial scale- as a condition of historic designation. It does, however, convey the expectation that historic structures will be preserved. The addition of modern infrastructure-such as a massive loafing barn-raises the concern that the NPS willingly compromises the historic integrity of the ranch districts while claiming to preserve them.

5. By what historic measure is the NPS permitting more than 5,700 beef and dairy cows to graze in the national seashore? How does new infrastructure, such as a loafing barn, impact the historic integrity of the ranching district? Under what circumstances will the public be afforded an opportunity to comment on impacts of such improvements to the ranches? How will the NPS ensure the preservation of historic structures/districts in the future? How will the preservation and interpretation of historic ranches be funded? How and when will the historic ranches be interpreted for the public? The GMPA provides no adaptive reuse plan for structures on

decommissioned ranches. Repurposing historic and cultural structures for public use, interpretation and other visitor benefits needs to be analyzed in under Alternative F.

Conflicts between ranchers and members of the public, and illegal No Trespassing signs are well known to the Seashore management. In addition are numerous documented violations of lease agreements and park regulations on the part of ranchers. Documents obtained under FOIA cite violations including overstocking cattle; chasing elk with ATVs and dogs; lack of adequate fences; failure to pay lease fees; refusal to cooperate with NPSs wildlife and rangeland staff; illegal dumping of cattle carcasses in the park; and overallotment of lands for hay and silage. The NPS continues to lease these public lands to these same ranchers and facilitates their entrenchment and expanded imprint on the Seashore.

6. Please explain in the GMPA/EIS whether and how ranching operations are evaluated before renewing or disallowing leases? Has the NPS ever denied a lease for violations or other failures to perform? In what way are ranchers held accountable for lease violations? How many ranches are historically and currently out of compliance? How does the NPS remedy repeat violations? With dwindling budgets and staff, how will the NPS monitor the ranches and enforce lease conditions that are becoming increasingly complex?

Some ranch residences appear unkempt, with cars and other unsightly junk visible to the public.

7. Not discussed in GMPA/EIS: How will the NPS perform its mandate of preserving the scenery of the national park on unkempt leased lands?

Dairy ranches are trampled to bare dirt with mountains of manure visible to park visitors. Dairy operations also raise concerns about animal welfare.

8. Not discussed in alternatives for continued ranching: How will the NPS perform its mandate of preserving the natural resources and scenery on dairy ranches? How does the NPS monitor the ranches to ensure animal welfare? What are the standards for the humane treatment of cattle herds and other proposed domestic livestock in the park? How are these regulations monitored and enforced?

The Seashore is suffering from Congressional budget cuts and insufficient staff.

9. How will the NPS perform the oversight and maintenance required of expanded and more complex ranching operations described in Alternative B? What impact will the demands of Alternative B have on general park maintenance, security, programs or visitor services, compared to the No Ranching, Alternative F?

Diversification of previously unauthorized livestock-pigs, sheep, goats, and up to 500 chickens on each ranch is an unprecedented change in policy. It will impact park wildlife, particularly birds and park predators. This but is insufficiently discussed in the GMPA. Ranch tours, homestays, processing facilities and farm stands for private gain have no place in a national park.

10. The GMPA/EIS fails to address the potential impacts of diversification to wildlife? How will these impacts be addressed, and at what cost? The GMPA/EIS is silent on this question, implying a just trust us approach. (When asked at the public open house, what the NPS will do should a coyote, bobcat, or fox take small livestock, the Seashores wildlife biologist answered, Well see.) There appears to be nothing in the GMPA/EIS that addresses the loss of wildlife to guard dogs or the possible poaching of nuisance wildlife, (other than Tule elk). These impacts must be analyzed and considered prior to approving diversification, the benefits of which appears to accrue solely to ranchers by expanding their revenue streams. Further commercializing the park with retail outlets and overnight stay also benefits rancher bottom line. The GMPA does not describe diversifications potential benefits to the public or to the parks natural resources and wildlife.

The land where confined Tule elk graze is visibly more diverse with native plant species than land grazed by domestic cattle. Yet, consistent in its preference for ranching over wildlife, the NPS bases its analysis on the

maximum number of cattle that can be grazed based on historic conditions (presumably 5,700). It bases the threshold number of native elk (120) on what forage is left after the maximum number of cattle have had their fill. The NPS provides no analysis of the number of elk that could be sustained in the park were there no competition from cattle. Because elk roam and graze more lightly than cattle, theoretically the park could support native Tule elk in numbers greater than the 5,700 cattle it allows in the park. Reportedly, 1,000 elk historically roamed the Point Reyes peninsula.

11. The GMPA/EIS does not provide this alternative analysis: How many elk the park can sustain were no cattle present, is necessary. It would include the number of elk sustainable using historic conditions; how many elk would be needed to control the presumed proliferation of invasive plants to allow the native plants recover over time; NPS recovery goals for native plants, and an accompanying management plan and timeline; and the economic impacts of redirecting funds currently used to subsidize cattle operations to restoring native plants and wildlife.

The Organic Act mandates that the NPS preserve wildlife in the national parks. Yet, native Tule elk at Drakes Beach will be managed to 120 solely to accommodate the special interest of private ranching. In addition, any elk foraging on leased lands will be shot because they affect ranchers profits.

12. Only one alternative in the GMP/EIS is consistent with the Organic Act. That is Alternative F, which would allow elk to expand their range.

The NPS has long tolerated the loss of wildlife and habitats from silage and haying operations to support the cattle operations. According to a 2015 report by Point Blue Conservation Science, Estimating Impact of Mowing in Silage Fields at Point Reyes N.S. on Breeding Birds, spring mowing macerates ground-nesting birds and small mammals, which attracts ravens and crows. Ravens and crows congregating at the ranches are the leading cause of predation on Snowy plovers, an endangered species that nests on Seashore beaches. The NPS dedicates significant resources to protecting the plovers, but efforts are hampered by predation. Ranching is at odds with the Snowy plover recovery efforts. Current mitigation is proving insufficient and continued failure risks the loss of the endangered species.

13. Though it acknowledges that impacts, including to endangered species, would be removed were ranching discontinued, the GMPA/EIS fails to provide any analysis for its position to perpetuate and expand private ranching. How will the NPS mitigate for impacts that jeopardize the survival of a listed species, including the Snowy plover? Will species recovery efforts include exterminating other native species-raven and crow?

Restoring endangered Coho salmon is the goal of a multi-million dollar, multi-year project on upstream parkland. The survival of the last remaining Coho salmon on Californias Central Coast is at risk. Yet, bacterial counts from cow-manure runoff into salmon and steelhead streams threaten the recovery of these and other aquatic species. Currently, state-issued waivers allow ranchers to pollute park streams and estuaries with manure runoff that ultimately degrades bay and marine environments. State water pollution waivers do not absolve the NPS of responsibility to minimize the sources of pollution on federal parklands.

The most effective mitigation would be to discontinue private ranching in the park, which is undermining substantial public investment in the recovery of salmon, steelhead and other aquatic species discussed in the GMPA/EIS.

14. What is the NPSs plan to prevent manure runoff from the park, clean up polluted streams and improve conditions for Coho, steelhead and other threatened aquatic species?

Following the purchase of the ranches, the federal government allowed members of the immediate family of the original ranchers to continue ranching in the park after the life estate or the original rancher expired.



15. Should the immediate family members of original ranchers decline to continue ranching, park ranches must be permanently retired and actively restored for natural resource values and visitor enjoyment.

Under no circumstances should succession originally intended only for multi-generational ranching, be extended to other relatives, neighbors, existing, former or current permittees, or others seeking to lease land in the Seashore for livestock grazing.

The GMPA/EIS acknowledges that GHG emissions from cattle exceed those of visitors vehicles and that methane produced by Seashore cattle has far more potent impacts than other GHGs.

There is no discussion of the NPSs plans for mitigating the climate impacts of the cattle in the park. Impacts of climate change weigh on the parks future-including the survival of rare, threatened and endangered plants and animals. Ignoring climate change mitigation in the GMPA/EIS is unacceptable. Yet, the NPS concludes that any mitigation by Seashore ranchers for their climate impacts is entirely voluntary.

Scientists recently estimated that humanity has twelve years in which to stave off irreversible global temperature rise. The NPSs preoccupation with catering to the demands a single special interest and its political allies ignores this reality.

16. The science is clear. Amidst the stark challenge of climate change and species extinctions, how will the NPS mitigate the GHG caused by Seashore ranches? What can the NPS do to defend our parks from the trend of privatization, exploitation, and degradation by special interests? Future generations will bear the brunt of climate disruption. How will the NPS explain its decision to prop up 24 ranchers rather than stand up for future generations?

Again, I cannot in good conscience recommend any Alternative other than Alternative F. I strongly implore the National Park Service to adopt Alternative F for the Update to the National Seashores General Management Plan.

Thank you very much for you time and consideration.

#6737

Name: N/A, N/A

Correspondence: It is wrong to kill a species that plays a vital role in the environment

#6738

Name: Murphy, Dianne

Correspondence: I am writing to urge the National Park Service to discontinue the grazing of beef and dairy cattle at Point Reyes National Seashore. This precious area has been damaged by livestock grazing which poses a threat to the environment and local wildlife and it should be protected and used to serve the public good, and not for the benefit of the livestock industry.

I strongly oppose Option B and any other proposal that would be fatal to Tule Elk or other wildlife to the benefit of ranching operations, and encourage the agency to adopt Option F to discontinue grazing and allow members of the public to enjoy this beautiful park and to be enriched with opportunities to visit and appreciate this special place.

#6739

Name: Carr, James

Correspondence: I am writing to urge the National Park Service to discontinue the grazing of beef and dairy cattle at Point Reyes National Seashore. This precious area has been damaged by livestock grazing which poses a threat

to the environment and local wildlife and it should be protected and used to serve the public good, and not for the benefit of the livestock industry.

I strongly oppose Option B and any other proposal that would be fatal to Tule Elk or other wildlife to the benefit of ranching operations, and encourage the agency to adopt Option F to discontinue grazing and allow members of the public to enjoy this beautiful park and to be enriched with opportunities to visit and appreciate this special place.

#6740

Name: Metcalf, Marlene

Correspondence: No ranching or dairy ranching or farm production belongs in the Point Reyes National Seashore which is supposed to be a wilderness preserve. Please GET THE FARMING OPERATIONS AND ANIMAL RANCHING AND DAIRY PRODUCTION OUT OF MY PARK. This park/preserve/wilderness is unique. It belongs to ALL OF US. It is our precious and much-beloved PATRIMONY, to be enjoyed in its WILD state.

GET the AGRICULTURE OUT OF THE PARK.

I LOVE POINT REYES. AND ALL I can smell is shit when I go there now.

I am not kidding. There is no smell except the overwhelming STENCH of 353,000,000 MILLION POUNDS of cow EXCREMENT produced and dumped on the ground, each and every single year. It cannot be absorbed. It is polluting everything, the water and the land and the air. It is a nightmare, a man-made nightmare of private profit, Private MONEY production, over our park, that belongs to everyone. There is NO place in our Point Reyes National Seashore wilderness reserve for Animal agriculture. I oppose it going on for another 20 days, let alone another 20 YEARS. PROTECT our wilderness. DO your job. Obey the law as it was drawn up in the first place. The Congressional plan was to have a wilderness SET ASIDE for us all to enjoy. AS far as money generated, the income enjoyed by this park area and its people and their hotels and stores who sell to the tourists, etc, from all the visitors who come to see the Native WILDLIFE, is \$150,000,000 million dollars a year. These visitors have, moreover, SAID in hundreds of surveys, that they "come to see the wildlife!" NOT the dairy cows and their millions of pounds of shit piled everywhere. Moreover, these visitors include ME, and all my friends and family and co-workers and club member friends and church and community groups who LIVE RIGHT HERE:

We want a PARK, a wilderness kept in its wild state, NOT A HUGE PILE OF ANIMAL SHIT from industrial factory farming/ranching production.

The PRIVATE profit of the dairy animal owners and other factory farm owners in the park, is about \$7 million dollars a year.

Just on the basis of what's best for ALL the people, it's clearly that we maintain a pristine virgin wilderness with wildlife only, free to roam and to fly.

Please do your jobs. Protect what we the people have already said to protect, already passed legislation to protect. So Protect it. Get the farming OUT of the park. Now, it needs to go now. I don't want it there another 20 days, let alone another 20 years!!!!

Thank you.

#6741

Name: Simpson, Bobbi

Correspondence: Fact: I love Point Reyes National Seashore and the National Park Service deeply.

My preferred alternative is F and my rationale is elucidated below:

I have observed over the years an extensive amount of damage to Point Reyes NS land related to overgrazing, spreading of manure, erosion, and the spread of invasive species. Extensive ranching is something that seems incompatible to the mission of the National Park Service - particularly when the practice is so destructive to the landscape.

My understanding: Point Reyes National Seashore's enabling legislation did not explicitly say that cattle ranching was to be continued in perpetuity. As such, this is a perfect opportunity to reevaluate and remove ranching altogether. The quote below is from National Park's Traveler editorial (by a prior Point Reyes National Seashore Vegetation Branch Chief) - and it confirmed this understanding that the enabling legislation did not state that ranching would be integral to the park management. This leaves the leeway to remove it altogether.:

"Ranching was not one of the intended purposes of the parks. In the enabling legislation, Congress established Point Reyes National Seashore in 1962 "to save and preserve, for the purposes of public recreation, benefit, and inspiration, a portion of the diminishing seashore of the United States that remains undeveloped." The purchase of the ranches clearly indicates that the intent was to remove the ranching operations in support of the enabling legislation. The DEIS itself (pp 1-2) clearly defines the "stated purposes" of the two park units: The purpose statement identifies the specific reason(s) why Point Reyes was established and lays the foundation for understanding what is most important about Point Reyes. The purpose statement for Point Reyes is as follows: Established for public benefit and inspiration, the Point Reyes National Seashore protects a rugged and wild coastal peninsula and surrounding waters, connecting native ecosystems, enduring human history and recreational, scientific, and educational opportunities. The purpose statement for Golden Gate is (NPS 2014a): The purpose of Golden Gate National Recreation Area is to offer national park experiences to all, including a large and diverse urban population, while preserving and interpreting the outstanding natural, historic, scenic, and recreational values of the park lands."

Cattle ranching is abundant in California and is not something I consider so rare that it should be protected by the National Park Service. A subset of ranch structures could be set aside to interpret, but cattle ranching is not working well.

There are many issues related to managing lands when commerce or financial profit becomes a motivator of leasees. I find the goal of protecting the lands that NPS is so entrusted to manage becomes viewed as an obstacle to ranchers attempting to make a profit from the land. I understand the desire to make a profit as a concept, but not when it comes to the detriment of park lands. When the chickens, pigs and other animals become threatened by coyotes - and ranchers demand that they too be removed, fenced, or killed what will be the NPS response? This will add even more of a burden on the existing staff and will deter the park from being able to focus on management of the resources in an effective manner. The focus on ranching or running reservations of use at this park has taken it's toll on managing the plethora of landscape issues.. the focus of the park on critical issues like climate change, invasive species, rare, threatened and endangered species, archives and other areas that need additional attention would be even further diminished. For instance the park's current workload that related to invasive plants alone would require a large base increase to the park budget to address introduced species related to cattle and diversified operations (e.g. fertile capeweed).

I think that an extension of leases to 20 years to tenants that in a large number of cases are currently overgrazing lands does not make sense. It seems like if the park ends up moving forward with grazing, that the performance should be spotless for 5 years before the privilege of an extended lease were made.

Thank you for the opportunity to comment, and I appreciate the complexity of this issue from a political and an environmental perspective.

Sincerely,

Bobbi Simpson

#6742

Name: Cobb, Jennifer

Correspondence: I am writing to urge the National Park Service to discontinue the grazing of beef and dairy cattle at Point Reyes National Seashore. This precious area has been damaged by livestock grazing which poses a threat to the environment and local wildlife and it should be protected and used to serve the public good, and not for the benefit of the livestock industry.

I strongly oppose Option B and any other proposal that would be fatal to Tule Elk or other wildlife to the benefit of ranching operations, and encourage the agency to adopt Option F to discontinue grazing and allow members of the public to enjoy this beautiful park and to be enriched with opportunities to visit and appreciate this special place.

Thank you, Jen Cobb

#6743

Name: Gallagher, Emily

Correspondence: Allowing ranching operations to expand or continue in any form on Point Reyes Seashore (Seashore) is contrary to Congress' stated purpose in establishing the Seashore "to save and preserve, for the purposes of public recreation, benefit, and inspiration, a portion of the diminishing seashore of the United States that remains undeveloped."

The NPS should adopt alternative F instead of its preferred alternative B. F phases out ranching which would finally achieve the original purpose of the establishment of the Seashore. Alternative F should be adopted over alternative B because:

1. Ranching is antithetical to the plain meaning and general public understanding of a national seashore. Visitors like myself want wild land, not ranches. In fact, I resisted visiting the Seashore for many years because I did not want to have to look at veal crates, grazing cattle, and ranch buildings. Too much of the Seashore's vistas are already obstructed by these eyesores, it cannot be allowed to expand or continue. When I visit the Seashore, my experience is negatively effected by the ranches.
2. Ranching is extremely detrimental to the native and other wild species that live at the Seashore, which is what Congress sought to protect by establishing the Seashore. This is plainly evident from the EIS. Ignoring the extreme damage animal agriculture continues to do the Seashore would be highly irresponsible.
3. Animal agriculture is a leading cause of climate change, a fact that has become public knowledge. The ranches are the leading cause of greenhouse gas emissions on the Seashore. As people work to reduce their consumption of animal products in light of this reality, they look to their government to lead in this regard. Expanding or preserving current ranching operations on the Seashore is a step backward in the fight against climate change.
4. Killing Tule elk for the sake of ranching is contrary to the purpose and public expectation of the Seashore. Many people worked tirelessly to bring the Tule elk back from the edge of extinction. Killing them, even a few, for the sake of animal foods is short sighted and disrespectful of the scientific community that worked to restore the Tule elk.
5. The Tule elk should have access to the grazing lands and water currently used by ranching operations so that they can flourish. To suggest that the Seashore can only support 120 is disingenuous. The ranches must be phased out so that a large, vibrant herd of Tule elk can live in safety on the Seashore. The Drakes Bay herd should not be

eliminated or reduced, and the Tomales Point herd should be permitted access to the land and water currently occupied by ranchers.

6. Ranches have had decades to wind-up operations and leave. They were paid at the time for the land. In choosing to gamble that the NPS would continue to let them stay as tenants, the ranchers took a risk that the public would one day demand that the NPS finally make them leave. The NPS has a responsibility to act in the public's interest as expressed in Congress's original intent for the Seashore, not to continue to ensure that the ranchers' gamble pays off.

7. The historical designation of the ranching buildings at Pierce Point should be reassessed. To the extent they remain under historical designation, the NPS should allow the buildings to remain unoccupied and unused. No cattle or other domesticated animals need to occupy any part of the Seashore in order for the historical designation or "character" to be respected. Historical designation is not an excuse to continue to allow ranching operations or kill Tule elk.

8. Alternatives B-E fail to consider the environmental impact of diversification. The EIS demonstrates that the fragile ecosystem of the Seashore cannot risk a "wait and see" approach. It is common knowledge that animal agricultural is dangerous for natural apex predators and other species. For the NPS to pretend otherwise is willfull blindness.

9. The Seashore cannot afford to enforce lease compliance, yet failing to do so has catastrophic consequences for the natural environment of the park and by extension, visitors. Ranching operations are an unnecessary drain on Seashore financial resources.

The NPS should revise alternative F, or create another alternative, which would be identical to alternative F but also include a plan to study the mitigation needs for the land that has been ranched. The EIS identified major environmental degradation due to ranching. The GMPA should include at the very least a pledge to further study the mitigation and recovery needs of this land.

#6744

Name: Stewart, Katie

Correspondence: I am writing to urge the National Park Service to discontinue the grazing of beef and dairy cattle at Point Reyes National Seashore. This precious area has been damaged by livestock grazing which poses a threat to the environment and local wildlife and it should be protected and used to serve the public good, and not for the benefit of the livestock industry.

I strongly oppose Option B and any other proposal that would be fatal to Tule Elk or other wildlife to the benefit of ranching operations, and encourage the agency to adopt Option F to discontinue grazing and allow members of the public to enjoy this beautiful park and to be enriched with opportunities to visit and appreciate this special place.

#6745

Name: Gaztanaga, Susan

Correspondence: A couple of days ago, I commented in a very vague way, merely expressing my concern for preserving the Tule Elk's habitat. Having read the executive summary and some opinions pro and con, I'm now leaning toward Alternative D, as it will give back 7,500 acres to the Tule elk, while respecting the rights of the ranching families who were there before the land became a national park. It also takes into consideration the historic character of these ranches. I would be interested in Alternative E if I could better understand why eliminating dairy farming in favor of beef only would be a positive move. Alternative C, which calls for killing entire 124 member Drakes Beach herd is terrible, and should not even be considered.

The NPS' preferred alternative, Alternative B, is not bad, in my opinion, although it doesn't address the problem of the Drakes Beach elk becoming too inbred as its gene pool is deliberately restricted.

#6746

Name: Wall, Denise

Correspondence: I am writing to urge the National Park Service to discontinue the grazing of beef and dairy cattle at Point Reyes National Seashore. This precious area has been damaged by livestock grazing which poses a threat to the environment and local wildlife and it should be protected and used to serve the public good, and not for the benefit of the livestock industry.

I strongly oppose Option B and any other proposal that would be fatal to Tule Elk or other wildlife to the benefit of ranching operations, and encourage the agency to adopt Option F to discontinue grazing and allow members of the public to enjoy this beautiful park and to be enriched with opportunities to visit and appreciate this special place.

#6747

Name: Nute, Edward

Correspondence: Thank you for this opportunity to comment on the proposed General Management Plan Amendments and the Draft EIS. Our comments are as follows:

If the allowable uses of ag lands within the park are diversified, conflicts between ranch animals and wildlife should be considered as well as impacts on roads and park infrastructure with increases in commercial traffic. For example row crops will require more frequent truck trips in addition to the milk and hay trucks presently using the existing narrow roads. The trucks could adversely affect the visitor experience and the park will need to budget for ongoing road repair.

With diversification there may be a tendency for families to sublease some of their land to outside commercial companies, such as for growing and harvesting row crops. This should be addressed including how it could be handled in their lease with the park. Also, if an historic ranch family decides to vacate its lease the lease should be dissolved rather than leasing it to another family.

The draft EIS needs to fully examine the environmental impacts of the proposed increased visitor use in Drakes Estero such as human waste, garbage, and potential for destruction of park and cultural resources in the sensitive Marine Wilderness. Furthermore the EIS needs to recognize that canoeing or kayaking near the mouth of Drake's Estero is dangerous. My daughter and a friend were swept out the mouth of the Estero on an outgoing tide and their canoe capsized. Fortunately after some time in the water they were rescued. If there is more use of the Estero by watercraft there will need to be more ranger presence (on a motorized craft in a wilderness area?) for public safety and to reduce the impacts on the environment.

Lethal management of wildlife, and in particular, the tule elk to benefit commercial interests of a lessee should not be prioritized over other management strategies. The elk herds should be protected. Do the elk eat as much forage as the Axis and Fallow deer which were removed?

The Draft EIS does not have a budget or any financial overview of how the alternatives and actions will be implemented and paid for. This information is essential to properly evaluate the impacts on natural resources management, visitor services, and other vital existing park programs.

#6748

Name: Voter, Citizen

Correspondence: NO! NO! NO! ~ We DO NOT NEED MORE CATTLE!!!! We DO however need Point Reyes

National Seashore to be managed under the Point Reyes Act for "maximum protection, restoration, and preservation of the natural environment." There's no mandate for prioritizing commercial agricultural leases on these public lands. So: Stop it, already! Let's hold onto the wildlife ~ all of it seriously endangered these days ~ especially the special stuff: e.g.: THE TULE ELK! Please! If You People got Your jobs because You love NATURE ~ AND MANY OF YOU DID (& do!) You must HOLD THE LINE vs. THIS ROGUE ADMINISTRATION! The Survival of the Entire Planet depends on it: DO THE RIGHT THING!

#6749

Name: page, elizabeth

Correspondence: Please do not kill the tule elk.

#6750

Name: Obendorfer, Meredith

Correspondence: I'm writing to support the public access and bicycling improvements outlined under Alternatives B, C, D, E, and F. I strongly support proposals that would lead to the planning and implementation of bicycling routes on trails, ranch roads, and pathways throughout the planning area, including but not limited to: 1) a connection between Devil's Gulch and Platform Bridge Road using existing ranch roads, 2) a connection between Bolinas Ridge Trail at Olema Hill and Point Reyes Station to serve as an interim connection for the Cross Marin Trail, 3) a connection between Bolinas Ridge Trail and Five Brooks Stables using existing ranch roads 4) a connection between Drakes Estero and Abbotts Lagoon Trail using existing ranch roads, 5) a connection between Marshall Beach Trailhead and Pierce Point Road using existing ranch roads, and 6) an Estero Trail loop using existing ranch roads.

Bicycling opportunities are currently very limited and fragmented; connectivity improvements and the creation of new loop options would enable me to enjoy more of the Seashore and surrounding areas by bike - rather than by car - attributing to Marin's tourist economy and being environmentally more friendly in my recreational habits. Importantly, I would feel much safer riding in the Seashore and surrounding areas on trails, pathways, and ranch roads, rather than on roads shared with fast-moving vehicular traffic.

Thanks in advance for your time and consideration. Meredith Obendorfer Marin homeowner and cyclist

#6751

Name: Britt, Joyce

Correspondence: All of the alternatives in the DEIS condemn agriculture as an abuse of the land, which the public already knows. Existing practices we know are bad for surface waters and for the bay and ocean waters. Any intensification of such use and more human intrusion violates not only the environmental standards of NEPA and CEQA, the Clean Water Act and ESAct, but also the legislation which created PRNS and also the Organic Act. The Peninsula should be a marine sanctuary for wildlife. The "historical site" is a myth.....we can all see that these sites are modern day agribusiness. Moreover the business model used for Alt B is seriously flawed and cannot be reconciled with the facts when scrutinized. Alternative F is the only way to save our Seashore.

#6752

Name: Richards, Elaine

Correspondence: Much as I love beef and dairy, it always baffled me that a national park was covered in ranches. As a visitor to the park, I have to wonder if this benefits me, a taxpayer, at all. I think not. I don't know whose pockets are being lined, but it certainly isn't mine.

According to an activist friend of mine, the ranchers regularly prevent elk from getting to water and forage, thus threatening their very existence. I am dismayed, but not surprised.

In the past couple of years, I've studied and become a county master gardener in Alameda and appreciate native plants. I have, on many occasions, gone hiking up in Pt. Reyes at the right time of year and am never disappointed... until I see cattle fences.

Of the plans described, I will say that I support "F", which phases out all cattle/dairy farming on national land. Again, whose pockets are being lined? Not mine. We need nature. We need pockets, at least, that are not tampered with and trampled on by human interests. This is so important, especially now, with the Trump administration attempting to treat national lands like some kind of yard sale for billionaires.

Go for "F". Let California be California. Let the visitors come and breathe clean air, not cow excrement. Let the elk be elk, bugling away. There will be mountain lions, of course. Bobcats, deer, birds, interesting and endangered plants. The cow farms can happen elsewhere. The people who crow about their jobs will miraculously find new ones. Life will go on and the park will be better.

#6753

Name: K, Linda

Correspondence: I would like to echo some of the ideas, suggestions, substance, concerns and questions that my husband has included in his official comment.

The Point Reyes National Seashores own website actually states as wild land habitat is lost elsewhere in California, the relevance of the Point Reyes Peninsula increases as a protected area with notable rich biological diversity. There are over 50 threatened, rare, or endangered species located in PRNS, nevertheless these species and the unique habitats in which they are found are not prioritized over cattle. Why? I believe the answer is rather straightforward, flora and fauna do not vote nor do they donate money. Meanwhile, agricultural interests are powerful and have way more influence on our elected politicians and appointed officials. That being said, nature does indeed bring in the most money by far and is in indeed the #1 reason tourists visit the park, not animal agriculture. In fact over \$132 million dollars was attributed to tourism at PRNS in 2017. Tourism is far more profitable and economically viable, as well as environmentally sustainable and safe compared to agriculture in our National Seashore. When we set up a table outside the Bear Valley Visitor Center back on one particular Saturday in early September for just a few hours, visitors overwhelmingly told us that they came to their National Seashore to see wildlife, not cows. Many visitors admitted that before they even arrived in PRNS, the hillsides they passed and roadsides they traveled on were already full of cattle. Nearby Marin Agricultural Land Trust properties already cover thousands and thousands of acres - over 50,000 acres to be exact. Over half of all land in Marin County, 167,000 acres, is farm and ranch land already. The absolute last thing we need is ranching and farming inside our critically important seashore. During the few hours we were set up at the visitor center we also asked another question - do you favor the Park Services proposed plan to kill our native Tule Elk? Visitors and locals alike responded by a count of 145 to 0 against this proposed plan. It was clear to us and those we talked to - prioritize biodiversity and environmental health in our publicly owned seashore!

A National Park should not be the place we experiment with and look into ways to create a new model for how ranches and dairies should operate. Let private agricultural interests outside of our fragile and important National Seashore learn to create a new model. This drastically needed to already happen (yesterday). To reiterate, do not prioritize the creation of a new ranching model in some of the very last sanctuaries set aside in critically important and strategic locations. PRNS should be discussing and prioritizing the restoration of severely diminished coastal prairies, dunes, wetlands, and riparian areas, and improving the overall health and well being of native populations of flora and fauna. PRNS should be a model for environmental conservation not private taxpayer subsidized environmental degradation.



Instead of looking for ways to better implement wildlife corridors, improve water quality, increase plant life and bird populations, the park service is proposing a new ranchland zone. This will only further exacerbate the problem, allowing destructive forms of land use to prevail in a biodiversity hotspot, that is indeed actually still waiting to live up to its full potential.

This past year the United Nations released a deeply distressing report compiled by nearly 150 authors from 50 nations. Together they worked for 3 years as part of the Intergovernmental Science-Policy Platform on Biodiversity and Ecosystem Services - a panel with 132 member nations, including the United States. Representatives of each member nation signed off on the reports findings and the authors of the report urged dramatic action, for Nature is declining globally at rates unprecedented in human history - and the rate of species extinctions is accelerating, with grave impacts on people around the world. The report also tells us that it is not too late to make a difference, but only if we start now [yesterday] at every level from local to global& Through transformative change nature can still be conserved, restored, and used sustainably - this is also key to meeting most other global goals. By transformative change, we mean fundamental, system-wide reorganization across technological, economic, and social factors, including paradigms, goals and values the report stated.

Two days ago, many prominent newspapers and media outlets reported on a new extensive study published in Science. The study revealed a 27% drop in the North American bird population in just the last 49 years. A majority of the 529 bird species studied experienced population loss, even species we tend to think of as abundant, such as warblers and blackbirds& We were stunned by the result-its just staggering, said Kenneth V. Rosenberg, a conservation scientist at Cornell University and the lead author of the study. Rosenberg goes on to say the magnitude of the decline could significantly affect the continents food webs and ecosystems, Were talking about pest control, were talking about pollination [and] seed dispersal [&] we can be pretty sure that other parts of the ecosystem are also in decline and degradation.

When will the Western Snowy Plover get the honest prioritization it deserves? When will the Swainsons hawk or the Willow flycatcher and Tricolored Blackbird get protections and park resources devoted to them, instead of cows and ranching operations?

The PRNSs website features another quote that is quite prudent, especially given the current proposal by the Park Service. In 1995 (almost 25 years ago) the National Academy of Sciences reported that: In recent years, it has become apparent that human activities are causing the loss of biological diversity at an increasing rate: the current rate of extinctions appears to be among the highest in the fossil record. Although non-human organisms can cause extinctions of other species to a small degree, no other organisms produce such large effects over such wide areas as humans do and have done-at least locally-for thousands of years. Habitat alteration and degradation are probably the most severe effects humans have on other species today. How can one not consider the enormous negative impacts ranching continues to have on the well being of our National Seashore?

We need to connect the dots& the Amazon rainforest is burning because of animal agriculture. The same forces at work down in Brazil are at actually at work here in the United States. This is not just unsustainable, it is a leading cause of species endangerment and ecosystem collapse. The health of our public lands are being sacrificed for private profit at the expense of our environment, our water, our air, our soil and so much more. While biodiversity continues to decline at a rapid pace, many of the species we could help in PRNS are being neglected and conveniently ignored. Another perspective to consider: There are 94 million 400 thousand cattle spread out across the United States of America! There are 5 million 125 thousand cattle scattered across California! These statistics are directly from the United States Department of Agriculture. Yet, there are only an estimated 5,200 native Tule Elk left in the world. This endemic umbrella species has already faced the grips of extinction once before. They are not the problem! There are less Tule Elk in our PRNS than there are cattle, simply put, this is wrong. Is there no room left for our iconic wildlife in our last critically important sanctuaries?

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. These words are directly taken from the Point Reyes National Seashore website.

Make our California Coast whole again. Let the Tule Elk thrive so that they can provide the ecosystem services that they have provided for thousands of years before ranchers showed up. I along with many others believe they can help restore our California Coastal Prairie - the most species rich grassland in North America. Cattle do not, I repeat do not, have the same impact as Tule Elk on our native grasslands - it is critical that science is utilized when forming policy in our National Seashore, not paid for made up myths.

It is the responsibility of all of us who live off the land to take care of the land. I am privileged to live and work in Marin County, and want nothing but the best for the people, wildlife, and environment of our dear home.

I think it is clear that I am against the Park Services preferred Alternative B plan. Those who visit the seashore cannot stand the continued deterioration of the natural resources of this park and the ongoing diminishment of the biological integrity. Alternative B is a disastrous choice that gives preference to 18 beef and 6 dairy ranches. This is not acceptable.

I think these wise words from ecologist George Wuerthner put things in perspective: Think about all the beautiful redwood parks scattered up and down California's coast. Nearly all of these parklands were created by purchasing the land from private property owners, just like we the public bought the ranches that remain in Point Reyes National Seashore. Now imagine that the previous landowners not only refused to leave our redwood parks but continue to cut down redwoods even after we bought the land and the trees for preservation. That is precisely what is going on in Point Reyes National Seashore... Would [our Congressman] Huffman be outraged if loggers were cutting trees in Muir Woods National Monument or Humboldt Redwood State Park, or Redwoods National and State Parks? I would hope so.

Two days ago my husband and I marched alongside 40,000 people in San Francisco as part of the youth led Global Climate Strike. Together, millions of other concerned and informed citizens of the world, people from all walks of life, stood in solidarity and spoke up for prioritizing environmental health and biodiversity around our planet. While we were sacrificing our own time to speak up for the native Tule Elk and the restoration of PRNS, I could not help but think of the millions of young people who were there trying to bring more awareness to these profound environmental issues. What does it say to our youth&let alone anyone out there, including my husband and I, who have individually made sacrifices to our everyday lives, when our National Park Service fails to do the right thing? What does it say to the individuals out there trying to make their own contributions to a better world (through diet, consumption, sustainable living, etc.) when the National Park Service has the opportunity to make a much greater more positive impact than any single one of us, and chooses to go the other way? We must protect our last wild spaces at all cost and this must be the highest mission of our National Parks.

After spending years trying to move to Marin County, my husband and I finally made our dreams come true. Although we were both born and raised elsewhere in the San Francisco Bay Area, it is West Marin that we hope to never leave. We love the small town feel and we value our proximity to open parks and wilder spaces. We love the environmental awareness of many of the people here and their progressive attitudes towards social and cultural issues. We love the natural world that still lingers, like the wildlife that visit us in our backyard and the others we see out on our regular ventures. We do not take for granted our home, far from it, we desire nothing but the best for it and set our expectations very high. This is why I am unwilling to accept the status quo. Enough is enough with the environmental degradation and diminishment of our natural resources. It is not like we do not have ranches elsewhere in our county, state, country. It is not like we do not have enough cattle. We must unite behind the science and take pride in learning to take care of our environment. We cannot tackle the many environmental issues that face us if we cannot first take care of the enormous ones at home. Point Reyes National Seashore should prioritize environmental health and biodiversity first and foremost. It is our National Seashore. Why would anyone prefer a sad picture of their home instead of a beautiful one that reflects their most promising values. I cannot in good conscience recommend any Alternative other than Alternative F. I strongly implore the National Park Service to adopt Alternative F for the Update to the National Seashores General Management Plan.

Now for further substance:

Neither the Organic Act of 1916 nor the legislation establishing the Point Reyes Seashore, (16 USC Sec 459c) includes language that commits the NPS to ensure the commercial success of private businesses operating in national parks. Leasing the land for ranching at Point Reyes National Seashore is discretionary. Nothing in the legislative record of the Seashore supports the myth of ranching in perpetuity. Specifically stated is that the land should be unimpaired for future generations and that uses be supportive of the maximum protection, restoration, and preservation of the natural environment within the area (16USC Sec. 459c (6)(a). Ranching, as conducted at the Point Reyes National Seashore and GGNRA, undermines this mandate.

1. Not discussed in GMPA/EIS: How and when will the NPS set goals for the maximum protection, restoration, and preservation of the Seashore and how will progress be measured? What is the timeframe for meeting them? What new or additional management methods will NPS implement to ensure the maximum protection, restoration, and preservation of the Seashore, per its legislative mandate? What are the costs of attaining maximum protection, restoration, and preservation and what resources has NPS allocated for this purpose?

The GMPA/EIS discusses the many and various environmental impacts of ranching to the Seashore but fails to rate the intensity of these impacts. The public can only guess at the significance of these documented impacts but has no way to know if these impacts are low, moderate or high.

2. Not described in GMPA/EIS: In addition to describing the environmental impacts of ranching to park resources, how does NPS rate those impacts? How will these impacts be mitigated and at what cost?

The economic benefits described in the GMPA/EIS point to a relatively small economic return to the County from the Seashore ranches. It cites the potential loss of fewer than 100 jobs should ranching end.

3. There is no mention in the GMPA/EIS of the working conditions of ranch workers or the notoriously sub-standard housing conditions of workers in the Seashore. Under Alternative B, how will the NPS oversee and improve the working and living conditions for ranch workers? What standards currently exist and how are they maintained?

Ranching is one of many resources listed in the NPSs 2019 draft Foundation Document for the Seashore. More than other historic, cultural or natural resources, ranching has been enshrined in the park, and unquestionably consumes park funds and staff resources that could address the Seashores many unmet needs.

4. The GMPA/EIS does not provide the costs of supporting the ranches, nor the proportion of the budget/staff dedicated to ranching relative to other park resources described in the Foundation Document, which include wilderness, coastal landscapes, marine, estuarine and freshwater environments, diverse habitats and native species, maritime cultural landscapes, continuum of human use (including ranching), opportunities for inspiration and recreation and science and learning. Such analyses are pertinent to the economic impact of increasing support for ranching at the expense of other unmet needs identified for funding.

The NPS has generously subsidized ranches for decades citing its mandate to preserve historic and cultural resources. In fact, ranching as practiced at the Seashore today bears little resemblance to historical ranching. The NPS has never interpreted the working ranches in the park for park visitors. In fact, the public is unwelcome on ranchlands that we, the public, own. The National Register of Historic Places now includes Seashore ranches. Noteworthy is that the National Register does not require active ranching-let alone on any commercial or industrial scale- as a condition of historic designation. It does, however, convey the expectation that historic structures will be preserved. The addition of modern infrastructure-such as a massive loafing barn-raises the concern that the NPS willingly compromises the historic integrity of the ranch districts while claiming to preserve them.

5. By what historic measure is the NPS permitting more than 5,700 beef and dairy cows to graze in the national seashore? How does new infrastructure, such as a loafing barn, impact the historic integrity of the ranching district? Under what circumstances will the public be afforded an opportunity to comment on impacts of such improvements to the ranches? How will the NPS ensure the preservation of historic structures/districts in the future? How will the preservation and interpretation of historic ranches be funded? How and when will the historic ranches be interpreted for the public? The GMPA provides no adaptive reuse plan for structures on decommissioned ranches. Repurposing historic and cultural structures for public use, interpretation and other visitor benefits needs to be analyzed in under Alternative F.

Conflicts between ranchers and members of the public, and illegal No Trespassing signs are well known to the Seashore management. In addition are numerous documented violations of lease agreements and park regulations on the part of ranchers. Documents obtained under FOIA cite violations including overstocking cattle; chasing elk with ATVs and dogs; lack of adequate fences; failure to pay lease fees; refusal to cooperate with NPSs wildlife and rangeland staff; illegal dumping of cattle carcasses in the park; and overallotment of lands for hay and silage. The NPS continues to lease these public lands to these same ranchers and facilitates their entrenchment and expanded imprint on the Seashore.

6. Please explain in the GMPA/EIS whether and how ranching operations are evaluated before renewing or disallowing leases? Has the NPS ever denied a lease for violations or other failures to perform? In what way are ranchers held accountable for lease violations? How many ranches are historically and currently out of compliance? How does the NPS remedy repeat violations? With dwindling budgets and staff, how will the NPS monitor the ranches and enforce lease conditions that are becoming increasingly complex?

Some ranch residences appear unkempt, with cars and other unsightly junk visible to the public.

7. Not discussed in GMPA/EIS: How will the NPS perform its mandate of preserving the scenery of the national park on unkempt leased lands?

Dairy ranches are trampled to bare dirt with mountains of manure visible to park visitors. Dairy operations also raise concerns about animal welfare.

8. Not discussed in alternatives for continued ranching: How will the NPS perform its mandate of preserving the natural resources and scenery on dairy ranches? How does the NPS monitor the ranches to ensure animal welfare? What are the standards for the humane treatment of cattle herds and other proposed domestic livestock in the park? How are these regulations monitored and enforced?

The Seashore is suffering from Congressional budget cuts and insufficient staff.

9. How will the NPS perform the oversight and maintenance required of expanded and more complex ranching operations described in Alternative B? What impact will the demands of Alternative B have on general park maintenance, security, programs or visitor services, compared to the No Ranching, Alternative F?

Diversification of previously unauthorized livestock-pigs, sheep, goats, and up to 500 chickens on each ranch is an unprecedented change in policy. It will impact park wildlife, particularly birds and park predators. This but is insufficiently discussed in the GMPA. Ranch tours, homestays, processing facilities and farm stands for private gain have no place in a national park.

10. The GMPA/EIS fails to address the potential impacts of diversification to wildlife? How will these impacts be addressed, and at what cost? The GMPA/EIS is silent on this question, implying a just trust us approach. (When asked at the public open house, what the NPS will do should a coyote, bobcat, or fox take small livestock, the Seashores wildlife biologist answered, Well see.) There appears to be nothing in the GMPA/EIS that addresses the loss of wildlife to guard dogs or the possible poaching of nuisance wildlife, (other than Tule elk). These impacts must be analyzed and considered prior to approving diversification, the benefits of which appears to accrue solely

to ranchers by expanding their revenue streams. Further commercializing the park with retail outlets and overnight stay also benefits rancher bottom line. The GMPA does not describe diversifications potential benefits to the public or to the parks natural resources and wildlife.

The land where confined Tule elk graze is visibly more diverse with native plant species than land grazed by domestic cattle. Yet, consistent in its preference for ranching over wildlife, the NPS bases its analysis on the maximum number of cattle that can be grazed based on historic conditions (presumably 5,700). It bases the threshold number of native elk (120) on what forage is left after the maximum number of cattle have had their fill. The NPS provides no analysis of the number of elk that could be sustained in the park were there no competition from cattle. Because elk roam and graze more lightly than cattle, theoretically the park could support native Tule elk in numbers greater than the 5,700 cattle it allows in the park. Reportedly, 1,000 elk historically roamed the Point Reyes peninsula.

11. The GMPA/EIS does not provide this alternative analysis: How many elk the park can sustain were no cattle present, is necessary. It would include the number of elk sustainable using historic conditions; how many elk would be needed to control the presumed proliferation of invasive plants to allow the native plants recover over time; NPS recovery goals for native plants, and an accompanying management plan and timeline; and the economic impacts of redirecting funds currently used to subsidize cattle operations to restoring native plants and wildlife.

The Organic Act mandates that the NPS preserve wildlife in the national parks. Yet, native Tule elk at Drakes Beach will be managed to 120 solely to accommodate the special interest of private ranching. In addition, any elk foraging on leased lands will be shot because they affect ranchers profits.

12. Only one alternative in the GMP/EIS is consistent with the Organic Act. That is Alternative F, which would allow elk to expand their range.

The NPS has long tolerated the loss of wildlife and habitats from silage and haying operations to support the cattle operations. According to a 2015 report by Point Blue Conservation Science, Estimating Impact of Mowing in Silage Fields at Point Reyes N.S. on Breeding Birds, spring mowing macerates ground-nesting birds and small mammals, which attracts ravens and crows. Ravens and crows congregating at the ranches are the leading cause of predation on Snowy plovers, an endangered species that nests on Seashore beaches. The NPS dedicates significant resources to protecting the plovers, but efforts are hampered by predation. Ranching is at odds with the Snowy plover recovery efforts. Current mitigation is proving insufficient and continued failure risks the loss of the endangered species.

13. Though it acknowledges that impacts, including to endangered species, would be removed were ranching discontinued, the GMPA/EIS fails to provide any analysis for its position to perpetuate and expand private ranching. How will the NPS mitigate for impacts that jeopardize the survival of a listed species, including the Snowy plover? Will species recovery efforts include exterminating other native species-raven and crow?

Restoring endangered Coho salmon is the goal of a multi-million dollar, multi-year project on upstream parkland. The survival of the last remaining Coho salmon on Californias Central Coast is at risk. Yet, bacterial counts from cow-manure runoff into salmon and steelhead streams threaten the recovery of these and other aquatic species. Currently, state-issued waivers allow ranchers to pollute park streams and estuaries with manure runoff that ultimately degrades bay and marine environments. State water pollution waivers do not absolve the NPS of responsibility to minimize the sources of pollution on federal parklands.

The most effective mitigation would be to discontinue private ranching in the park, which is undermining substantial public investment in the recovery of salmon, steelhead and other aquatic species discussed in the GMPA/EIS.

14. What is the NPSs plan to prevent manure runoff from the park, clean up polluted streams and improve conditions for Coho, steelhead and other threatened aquatic species?

Following the purchase of the ranches, the federal government allowed members of the immediate family of the original ranchers to continue ranching in the park after the life estate or the original rancher expired.

15. Should the immediate family members of original ranchers decline to continue ranching, park ranches must be permanently retired and actively restored for natural resource values and visitor enjoyment.

Under no circumstances should succession originally intended only for multi-generational ranching, be extended to other relatives, neighbors, existing, former or current permittees, or others seeking to lease land in the Seashore for livestock grazing.

The GMPA/EIS acknowledges that GHG emissions from cattle exceed those of visitors vehicles and that methane produced by Seashore cattle has far more potent impacts than other GHGs.

There is no discussion of the NPSs plans for mitigating the climate impacts of the cattle in the park. Impacts of climate change weigh on the parks future-including the survival of rare, threatened and endangered plants and animals. Ignoring climate change mitigation in the GMPA/EIS is unacceptable. Yet, the NPS concludes that any mitigation by Seashore ranchers for their climate impacts is entirely voluntary.

Scientists recently estimated that humanity has twelve years in which to stave off irreversible global temperature rise. The NPSs preoccupation with catering to the demands a single special interest and its political allies ignores this reality.

16. The science is clear. Amidst the stark challenge of climate change and species extinctions, how will the NPS mitigate the GHG caused by Seashore ranches? What can the NPS do to defend our parks from the trend of privatization, exploitation, and degradation by special interests? Future generations will bear the brunt of climate disruption. How will the NPS explain its decision to prop up 24 ranchers rather than stand up for future generations?

Again, I cannot in good conscience recommend any Alternative other than Alternative F. I strongly implore the National Park Service to adopt Alternative F for the Update to the National Seashores General Management Plan.

Thank you

#6754

Name: Metcalf, Mildred

Correspondence: No ranching or dairy ranching or farm production belongs in the Point Reyes National Seashore which is supposed to be a wilderness preserve. Please GET THE FARMING OPERATIONS AND ANIMAL RANCHING ND DAIRY PRODUCTION OUT OF MY PARK. This park/preserve/wilderness. It is priceless and unique. It belongs to ALL OF US. It is our precious and much-beloved PATRIMONY, to be enjoyed in its WILD state.

GET the AGRICULTURE OUT OF THE PARK.

I LOVE POINT REYES. AND ALL I can smell is shit when I go there now.

I am not kidding. There is no smell except the overwhelming STENCH of 353,000,000 MILLION POUNDS of cow EXCREMENT produced and dumped on the ground, each and every single year. It cannot be absorbed. It is polluting everything. the water and the land and the air. It is a nightmare, a man-made nightmare of private profit, Private MONEY production, over our park, that belongs to everyone. There is NO place in our Point Reyes

National Seashore wilderness reserve for Animal agriculture. I oppose it going on for another 20 days, let alone another 20 YEARS. PROTECT our wilderness. DO your job. Obey the law as it was drawn up in the first place. The Congressional plan was to have a wilderness SET ASIDE for us all to enjoy. AS far as money generated, the income enjoyed by this park area and its people and their hotels and stores who sell to the tourists, etc,from all the visitors who come to see the Native WILDLIFE, is \$150,000,000 million dollars a year. These visitors have, moreover,SAID in hundreds of surveys, that they "come to see the wildlife!" NOT the dairy cows and their millions of pounds of shit piled everywhere. Moreover, these visitors include ME, and all my friends and family and co-workers and club member friends and church and community groups who LIVE RGHT HERE:

We want a PARK, a wilderness kept in its wild state, NOT A HUGE PILE OF ANIMAL SHIT from industrial factory farming/ranching production.

The PRIVATE profit of the dairy animal owners and other factory farm owners in the park, is about \$7 million dollars a year.

Just on the basis of what's best for ALL the people, it's clearly that we maintain a pristine virgin wilderness with wildlife only, free to roam and to fly.

Please do your jobs. Protect what we the people have already said to protect, already passed legislation to protect. So Protect it. Get the farming OUT of the park. Now, it needs to go now. I don't want it there another 20 days, let alone another 20 years!!!!

Thank you.

#6755

Name: Metcalf, Frances

Correspondence: No ranching or dairy ranching or farm production belongs in the Point Reyes National Seashore which is supposed to be a wilderness preserve. Please GET THE FARMING OPERATIONS AND ANIMAL RANCHING DAIRY PRODUCTION OUT OF MY PARK. This park/preserve/wilderness. It is priceless and unique. It belongs to ALL OF US. It is our precious and much-beloved PATRIMONY, to be enjoyed in its WILD state.

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#6756

Name: Metcalf, Edgar

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Name: Brown, Dennis

Correspondence: No ranching or dairy ranching or farm production belongs in the Point Reyes National Seashore which is supposed to be a wilderness preserve. Please GET THE FARMING OPERATIONS AND ANIMAL RANCHING DAIRY PRODUCTION OUT OF MY PARK. This park/preserve/wilderness. It is priceless and unique. It belongs to ALL OF US. It is our precious and much-beloved PATRIMONY, to be enjoyed in its WILD state.

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Thank you.

#6758

Name: Rachko, Tamara

Correspondence: No ranching or dairy ranching or farm production belongs in the Point Reyes National Seashore which is supposed to be a wilderness preserve. Please GET THE FARMING OPERATIONS AND ANIMAL RANCHING DAIRY PRODUCTION OUT OF MY PARK. This park/preserve/wilderness. It is priceless and unique. It belongs to ALL OF US. It is our precious and much-beloved PATRIMONY, to be enjoyed in its WILD state.

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Thank you.

#6759

Name: N/A, N/A

Correspondence: I am writing to urge the National Park Service to discontinue the grazing of beef and dairy cattle at Point Reyes National Seashore. This precious area has been damaged by livestock grazing which poses a threat to the environment and local wildlife and it should be protected and used to serve the public good, and not for the benefit of the livestock industry.

I strongly oppose Option B and any other proposal that would be fatal to Tule Elk or other wildlife to the benefit of ranching operations, and encourage the agency to adopt Option F to discontinue grazing and allow members of the public to enjoy this beautiful park and to be enriched with opportunities to visit and appreciate this special place.

Thank you for listening, Deborah

#6760

Name: Haughawout, Ted

Correspondence: I strongly urge the NPS to NOT allow continued grazing of beef/cattle at the Point Reyes National Seashore. I am aghast anyone would consider Option B or any plan that would kill and/or eliminate the elk. Keep the area open to the public and maintain/preserve the park's pristine beauty.

#6761

Name: Lakhani, Nikita

Correspondence: It would be wrong to kill the elk.

#6762

Name: Wiley, Jana

Correspondence: As a native Californian who was born in the Bay Area, Point Reyes was always a highlight.

The park was intended for people to enjoy, not cattle and dairy cows to over graze and decimate. We have all tried to look beyond the cows and the bleak landscapes, but it is now time to recognize the validity of option F.

Please make your considerations carefully. There are consequences to choosing cattle over natural systems.

#6763

Name: LAKhani, Nikita

Correspondence: I am writing to urge the National Park Service to discontinue the grazing of beef and dairy cattle at Point Reyes National Seashore. This precious area has been damaged by livestock grazing which poses a threat to the environment and local wildlife and it should be protected and used to serve the public good, and not for the benefit of the livestock industry.

I strongly oppose Option B and any other proposal that would be fatal to Tule Elk or other wildlife to the benefit of ranching operations, and encourage the agency to adopt Option F to discontinue grazing and allow members of the public to enjoy this beautiful park and to be enriched with opportunities to visit and appreciate this special place.

#6764

Name: Lawrence, Melissa & Steven

Correspondence: I am writing to urge the National Park Service to discontinue the grazing of beef and dairy cattle at Point Reyes National Seashore. This precious area has been damaged by livestock grazing which poses a threat to the environment and local wildlife and it should be protected and used to serve the public good, and not for the benefit of the livestock industry.

I strongly oppose Option B and any other proposal that would be fatal to Tule Elk or other wildlife to the benefit of ranching operations, and encourage the agency to adopt Option F to discontinue grazing and allow members of the public to enjoy this beautiful park and to be enriched with opportunities to visit and appreciate this special place.

#6765

Name: Padfield, Sheryl

Correspondence: I have enjoyed Point Reyes Park for 35 yrs and did not know the ranches had been paid for their houses and land long ago and allowed to continue ranching there. Our parks should remain open to the public and return as was intended to their natural state. There is massive ranching thru out California and for us to allow it here then poison our ocean with runoff while killing native species so we can supply meat is atrocious. Make the ranchers go elsewhere as they promised years ago. California needs to keep the parks for the people!!!! Our future generations deserve beautiful open space!!!!

#6766

Name: Wilson, Jacki

Correspondence: I am writing to urge the National Park Service to discontinue the grazing of beef and dairy cattle at Point Reyes National Seashore. This precious area has been damaged by livestock grazing which poses a threat to the environment and local wildlife and it should be protected and used to serve the public good, and not for the benefit of the livestock industry.

I strongly oppose Option B and any other proposal that would be fatal to Tule Elk or other wildlife to the benefit of ranching operations, and encourage the agency to adopt Option F to discontinue grazing and allow members of the public to enjoy this beautiful park and to be enriched with opportunities to visit and appreciate this special place.

The elk are native to the area, killing THEM shouldn't EVEN BE CONSIDERED in dealing with this issue. Please rethink the best way to do this without killing any precious native wildlife. The cattle need to be moved elsewhere. (I personally am against animals used for meat and any product they provide by being killed, also.)

PLEASE protect these elk that belong in this area. This should not be about human greed. Thank you.

Respectfully, Jacki Wilson

#6767

Name: Sanger, Margo

Correspondence: "Dear Sir or Madame: Please do not allow the extension of leasing of public lands to cattle grazing, or other commercial agricultural pursuit. I also have heard that you are considering expanding the type of commercial farming activity, i.e., diversification of farming species, to occur on public lands at Point Reyes seashore. Instead, I urge you to adopt Alternative F of the proposals, phasing out ranching, and managing the land, water and wildlife.

The public has already paid for this land to be kept wild. Currently, the Park Service is permitting this public land, and the native species which originally inhabited it, to be despoiled and destroyed. This is a travesty, a disgrace, and is certainly outside the bounds of the legislation which is supposed to protect the land from exploitation. The Park Service is clearly in breach of the fiduciary duty it owes to the people of the US who paid for this wild land to be set apart from exploitation. And of course, it is an utter betrayal to allow the native species to suffer and die, or to be displaced, due to what may very well be illegal exploitation of this land by commercial agribusiness.

There is no saving grace to be had in falsely identifying these commercial "farms", which are despoiling both land and species, as historical and/or bucolic! You simply must stop this activity, and allow the land to be returned to the public as was intended and authorized under the law. Please adhere to your responsibility on this matter, and reverse current plans to expand these destructive practices! Do what you are charged to do under law! Very truly yours Margo Sanger

#6768

Name: Hagen, Bob

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

Neither the Organic Act of 1916 nor the legislation establishing the Point Reyes Seashore, (16 USC Sec 459c) includes language that commits the NPS to ensure the commercial success of private businesses operating in

national parks. Leasing the land for ranching at Point Reyes National Seashore is discretionary. Nothing in the legislative record of the Seashore supports the myth of ranching in perpetuity. Specifically stated is that the land should be "unimpaired for future generations" and that uses be "supportive of the maximum protection, restoration, and preservation of the natural environment within the area (16USC Sec. 459c (6)(a)). Ranching, as conducted at the Point Reyes National Seashore and GGNRA, undermines this mandate.

1. Not discussed in GMPA/EIS: How and when will the NPS set goals for the "maximum protection, restoration, and preservation" of the Seashore and how will progress be measured? What is the timeframe for meeting them? What new or additional management methods will NPS implement to ensure the "maximum protection, restoration, and preservation" of the Seashore, per its legislative mandate? What are the costs of attaining "maximum protection, restoration, and preservation" and what resources has NPS allocated for this purpose?

The GMPA/EIS discusses the many and various environmental impacts of ranching to the Seashore but fails to rate the intensity of these impacts. The public can only guess at the significance of these documented impacts but has no way to know if these impacts are low, moderate or high.

2. Not described in GMPA/EIS: In addition to describing the environmental impacts of ranching to park resources, how does NPS rate those impacts? How will these impacts be mitigated and at what cost?

The economic benefits described in the GMPA/EIS point to a relatively small economic return to the County from the Seashore ranches. It cites the potential loss of fewer than 100 jobs should ranching end.

3. There is no mention in the GMPA/EIS of the working conditions of ranch workers or the notoriously sub-standard housing conditions of workers in the Seashore. Under Alternative B, how will the NPS oversee and improve the working and living conditions for ranch workers? What standards currently exist and how are they maintained?

Ranching is one of many "resources" listed in the NPS's 2019 draft Foundation Document for the Seashore. More than other historic, cultural or natural resources, ranching has been enshrined in the park, and unquestionably consumes park funds and staff resources that could address the Seashore's many unmet needs.

4. The GMPA/EIS does not provide the costs of supporting the ranches, nor the proportion of the budget/staff dedicated to ranching relative to other park resources described in the Foundation Document, which include wilderness, coastal landscapes, marine, estuarine and freshwater environments, diverse habitats and native species, maritime cultural landscapes, continuum of human use (including ranching), opportunities for inspiration and recreation and science and learning. Such analyses are pertinent to the economic impact of increasing support for ranching at the expense of other unmet needs identified for funding.

The NPS has generously subsidized ranches for decades citing its mandate to preserve "historic and cultural resources." In fact, ranching as practiced at the Seashore today bears little resemblance to historical ranching. The NPS has never interpreted the working ranches in the park for park visitors. In fact, the public is unwelcome on ranchlands that we, the public, own. The National Register of Historic Places now includes Seashore ranches. Noteworthy is that the National Register does not require active ranching-let alone on any commercial or industrial scale- as a condition of historic designation. It does, however, convey the expectation that historic structures will be preserved. The addition of modern infrastructure-such as a massive "loafing barn"-raises the concern that the NPS willingly compromises the historic integrity of the ranch districts while claiming to preserve them.

5. By what historic measure is the NPS permitting more than 5,700 beef and dairy cows to graze in the national seashore? How does new infrastructure, such as a "loafing barn," impact the historic integrity of the ranching district? Under what circumstances will the public be afforded an opportunity to comment on impacts of such "improvements" to the ranches? How will the NPS ensure the preservation of historic structures/districts in the future? How will the preservation and interpretation of historic ranches be funded? How and when will the

historic ranches be interpreted for the public? The GMPA provides no adaptive reuse plan for structures on decommissioned ranches. Repurposing historic and cultural structures for public use, interpretation and other visitor benefits needs to be analyzed in under Alternative F.

Conflicts between ranchers and members of the public, and illegal "No Trespassing" signs are well known to the Seashore management. In addition are numerous documented violations of lease agreements and park regulations on the part of ranchers. Documents obtained under FOIA cite violations including overstocking cattle; chasing elk with ATVs and dogs; lack of adequate fences; failure to pay lease fees; refusal to cooperate with NPS's wildlife and rangeland staff; illegal dumping of cattle carcasses in the park; and overall allotment of lands for hay and silage. The NPS continues to lease these public lands to these same ranchers and facilitates their entrenchment and expanded imprint on the Seashore.

6. Please explain in the GMPA/EIS whether and how ranching operations are evaluated before renewing or disallowing leases? Has the NPS ever denied a lease for violations or other failures to perform? In what way are ranchers held accountable for lease violations? How many ranches are historically and currently out of compliance? How does the NPS remedy repeat violations? With dwindling budgets and staff, how will the NPS monitor the ranches and enforce lease conditions that are becoming increasingly complex?

Some ranch residences appear unkempt, with cars and other unsightly junk visible to the public.

7. Not discussed in GMPA/EIS: How will the NPS perform its mandate of preserving the scenery of the national park on unkempt leased lands?

Dairy ranches are trampled to bare dirt with mountains of manure visible to park visitors. Dairy operations also raise concerns about animal welfare.

8. Not discussed in alternatives for continued ranching: How will the NPS perform its mandate of preserving the natural resources and scenery on dairy ranches? How does the NPS monitor the ranches to ensure animal welfare? What are the standards for the humane treatment of cattle herds and other proposed domestic livestock in the park? How are these regulations monitored and enforced?

The Seashore is suffering from Congressional budget cuts and insufficient staff.

9. How will the NPS perform the oversight and maintenance required of expanded and more complex ranching operations described in Alternative B? What impact will the demands of Alternative B have on general park maintenance, security, programs or visitor services, compared to the No Ranching, Alternative F?

Diversification of previously unauthorized livestock-pigs, sheep, goats, and up to 500 chickens on each ranch is an unprecedented change in policy. It will impact park wildlife, particularly birds and park predators. This but is insufficiently discussed in the GMPA. Ranch tours, homestays, processing facilities and farm stands for private gain have no place in a national park.

10. The GMPA/EIS fails to address the potential impacts of "diversification" to wildlife? How will these impacts be addressed, and at what cost? The GMPA/EIS is silent on this question, implying a "just trust us" approach. (When asked at the public open house, what the NPS will do should a coyote, bobcat, or fox "take" small livestock, the Seashore's wildlife biologist answered, "We'll see.") There appears to be nothing in the GMPA/EIS that addresses the loss of wildlife to guard dogs or the possible poaching of "nuisance" wildlife, (other than Tule elk). These impacts must be analyzed and considered prior to approving diversification, the benefits of which appears to accrue solely to ranchers by expanding their revenue streams. Further commercializing the park with retail outlets and overnight stay also benefits rancher' bottom line. The GMPA does not describe diversification's potential benefits to the public or to the park's natural resources and wildlife.

The land where confined Tule elk graze is visibly more diverse with native plant species than land grazed by domestic cattle. Yet, consistent in its preference for ranching over wildlife, the NPS bases its analysis on the maximum number of cattle that can be grazed based on historic conditions (presumably 5,700). It bases the threshold number of native elk (120) on what forage is left after the maximum number of cattle have had their fill. The NPS provides no analysis of the number of elk that could be sustained in the park were there no competition from cattle. Because elk roam and graze more lightly than cattle, theoretically the park could support native Tule elk in numbers greater than the 5,700 cattle it allows in the park. Reportedly, 1,000 elk historically roamed the Point Reyes peninsula.

11. The GMPA/EIS does not provide this alternative analysis: How many elk the park can sustain were no cattle present, is necessary. It would include the number of elk sustainable using historic conditions; how many elk would be needed to control the presumed proliferation of invasive plants to allow the native plants recover over time; NPS recovery goals for native plants, and an accompanying management plan and timeline; and the economic impacts of redirecting funds currently used to subsidize cattle operations to restoring native plants and wildlife.

The Organic Act mandates that the NPS preserve wildlife in the national parks. Yet, native Tule elk at Drakes Beach will be "managed" to 120 solely to accommodate the special interest of private ranching. In addition, any elk foraging on leased lands will be shot because they affect ranchers' profits.

12. Only one alternative in the GMP/EIS is consistent with the Organic Act. That is Alternative F, which would allow elk to expand their range.

The NPS has long tolerated the loss of wildlife and habitats from silage and haying operations to support the cattle operations. According to a 2015 report by Point Blue Conservation Science, "Estimating Impact of Mowing in Silage Fields at Point Reyes N.S. on Breeding Birds," spring mowing macerates ground-nesting birds and small mammals, which attracts ravens and crows. Ravens and crows congregating at the ranches are the leading cause of predation on Snowy plovers, an endangered species that nests on Seashore beaches. The NPS dedicates significant resources to protecting the plovers, but efforts are hampered by predation. Ranching is at odds with the Snowy plover recovery efforts. Current mitigation is proving insufficient and continued failure risks the loss of the endangered species.

13. Though it acknowledges that impacts, including to endangered species, would be removed were ranching discontinued, the GMPA/EIS fails to provide any analysis for its position to perpetuate and expand private ranching. How will the NPS mitigate for impacts that jeopardize the survival of a listed species, including the Snowy plover? Will species recovery efforts include exterminating other native species-raven and crow?

Restoring endangered Coho salmon is the goal of a multi-million dollar, multi-year project on upstream parkland. The survival of the last remaining Coho salmon on California's Central Coast is at risk. Yet, bacterial counts from cow-manure runoff into salmon and steelhead streams threaten the recovery of these and other aquatic species. Currently, state-issued waivers allow ranchers to pollute park streams and estuaries with manure runoff that ultimately degrades bay and marine environments. State water pollution waivers do not absolve the NPS of responsibility to minimize the sources of pollution on federal parklands.

The most effective mitigation would be to discontinue private ranching in the park, which is undermining substantial public investment in the recovery of salmon, steelhead and other aquatic species discussed in the GMPA/EIS.

14. What is the NPS's plan to prevent manure runoff from the park, clean up polluted streams and improve conditions for Coho, steelhead and other threatened aquatic species?

Following the purchase of the ranches, the federal government allowed members of the immediate family of the original ranchers to continue ranching in the park after the life estate or the original rancher expired.

15. Should the immediate family members of original ranchers decline to continue ranching, park ranches must be permanently retired and actively restored for natural resource values and visitor enjoyment.

Under no circumstances should "succession" originally intended only for multi-generational ranching, be extended to other relatives, neighbors, existing, former or current permittees, or others seeking to lease land in the Seashore for livestock grazing.

The GMPA/EIS acknowledges that GHG emissions from cattle exceed those of visitors' vehicles and that methane produced by Seashore cattle has far more potent impacts than other GHGs.

There is no discussion of the NPS's plans for mitigating the climate impacts of the cattle in the park. Impacts of climate change weigh on the park's future-including the survival of rare, threatened and endangered plants and animals. Ignoring climate change mitigation in the GMPA/EIS is unacceptable. Yet, the NPS concludes that any mitigation by Seashore ranchers for their climate impacts is entirely voluntary.

Scientists recently estimated that humanity has twelve years in which to stave off irreversible global temperature rise. The NPS's preoccupation with catering to the demands a single special interest and its political allies ignores this reality.

16. The science is clear. Amidst the stark challenge of climate change and species extinctions, how will the NPS mitigate the GHG caused by Seashore ranches? What can the NPS do to defend our parks from the trend of privatization, exploitation, and degradation by special interests? Future generations will bear the brunt of climate disruption. How will the NPS explain its decision to prop up 24 ranchers rather than stand up for future generations?

I recommend that the National Park Service implement Alternative F to the National Seashore's General Management Plan.

#6769

Name: Reese, Patricia

Correspondence: It is unacceptable that the National Park Service and the Point Reyes National Seashore management are not in compliance with the park's mission, scientific studies, or public sentiment as it seeks to perpetuate industrial dairy ranching within the park.

As both park and independent studies show, dairy farming is incompatible with preserving park native flora and fauna, promoting biodiversity, protecting surrounding marine environments, enhancing public use, and, on a broader level, addressing climate change.

That the Park is culling the native elk so as to enhance dairy farming is unconscionable. Dairy farming on Point Reyes is responsible for the poisoning of the water and land with their waste, the decimation of native plants due to grazing, the killing of native birds and mammals to maintain pastures and farm silage and hay, the propagation of the predatory crow population, and widespread erosion. All these factors ultimately impact shorebirds and marine life, including elephant seals, sea lions, sharks, plovers, and pelicans. That the park would think that the elk are problematic is an indication of how out of touch they are.

It is insulting to one's intelligence that Park management would attempt to extend dairy leases under the guise that the ranches have historical significance. Marin and Sonoma counties are full of coastal dairy farms. The primary difference between the Point Reyes ranches and those elsewhere is their adverse impact on the truly historic value of the park, namely that it is one of the last vestiges of native coastal prairie and our connection to the landscape through native populations -who lived in the area for thousands of years.



The ranches have had 50 years to comply with the park's founding legislation. Closing the Point Reyes ranches is long overdue. I will be supporting every effort to make it so.

Sincerely,

#6770

Name: Travis, Cherie

Correspondence: PLEASE DO NOT RENEW THE LEASE FOR GRAZING OF CATTLE at Point Reyes National Seashore. The National Park Service lands should be to preserve and protect wildlife and plant life and NOT to graze cows for private ranchers.

I am opposed to any proposal that would harm Tule Elk or other wildlife. I ask that the NPS discontinue any arrangement for grazing of cows and restore national park lands to be used by the public and the natural wildlife and plant life.

#6771

Name: Harden, Ronald

Correspondence: I wish to express my support for Alternative F for management of Point Reyes National Seashore, and my opposition to the National Park Service's "preferred Alternative B". Our national public lands, especially those under the National Park Service, should be kept for the benefit of all our nation's citizens, not given over to narrow interests. It is important that the Seashore be kept as habitat for the Tule Elk and all the wildlife there, for the enjoyment of our citizens as well as for the protection of the wildlife. Disruption of the natural presence of the Seashore's wildlife by barriers built for cattle is unacceptable. NPS should not sacrifice our nation's wildlife and wildlife habitat heritage.

#6772

Name: Lang, Louise

Correspondence: Save the Tule Elk. I support Alternative F.

#6773

Name: cullen, kathleen

Correspondence: I am writing to urge the National Park Service to discontinue the grazing of beef and dairy cattle at Point Reyes National Seashore. This precious area has been damaged by livestock grazing which poses a threat to the environment and local wildlife and it should be protected and used to serve the public good, and not for the benefit of the livestock industry.

I strongly oppose Option B and any other proposal that would be fatal to Tule Elk or other wildlife to the benefit of ranching operations, and encourage the agency to adopt Option F to discontinue grazing and allow members of the public to enjoy this beautiful park and to be enriched with opportunities to visit and appreciate this special place.

#6774

Name: N/A, N/A

Correspondence: It's been almost 50 years since the park was formed. Now would be a good time to steer it toward living up to its potential as the national treasure it could be. I favor Alternative F because it provides the best public use and enjoyment. Nobody comes to Pt. Reyes to see the commercial cattle operations. They come for the natural beauty of the landscape and the wildlife. Cows can be seen on the private lands on the other side of

Tomales Bay. The public lands inside the National Seashore should be reserved for the elk and other native wildlife.

#6775

Name: Gaman, Thomas

Correspondence: 23 September 2019 Dear NPS Re: Comments on Point Reyes Ranch General Management Plan Amendment DEIS

The DEIS describes and to some extent quantifies the considerable environmental effects of dairies at Point Reyes. Oddly, the preferred alternative is that with the greatest impact. There is also major destruction of the road from the many and frequent heavy vehicles that service the dairies. Public investments in these roads obviously subsidize ranching operations. The major access roads do not seem to be addressed in the DEIS because they are apparently outside of the planning area, but they nonetheless are impacted. The park portion of Sir Francis Drake Blvd was obviously not built for these heavy vehicles, and the transportation impacts and public safety issues, including park access communities, should be addressed.

Row cropping, sheep and goats graze impacts should be fully evaluated. This and other new uses appear to be expanded private commercial uses of public park lands and I do not understand why these types of uses are proposed.

Transit by foot through in the vicinity of the Home Ranch has been restricted for many years and results in lack of connectivity in the area of the Estero Trail. A circular route should provide public access and could be arranged on existing roads and trails. Similarly barbed-wire fencing seems ubiquitous in the park. While the DEIS notes that visitors often use these ranchlands for walking, there is no provision, such as stiles, that will enable walkers to get over fences barring their way on these public footpaths.

In spite of the DEISs claim that many of the historic buildings are in fair condition, externally most appear to be in very poor condition, lacking all but the most basic maintenance. The DEIS should inform decisionmakers on the necessary specific improvements and the shared public/private ranch maintenance responsibilities. Air and water quality and climate change are issues. Other than acknowledging the many impacts of dairy on air and water quality, the DEIS does not seem to make much effort to limit the extent of those impacts. Manure management systems, digesters, and other facilities can reduce emissions and provide fuels that provide energy for ranching. The effects of climate change are not discussed at all. The bishop pine forests within the pastoral area are dying. Also oak woodlands are disappearing in the Olema Valley. The park should provide for protection and restoration of forests, woodlands and heritage trees.

There seems to be no detailed discussion of the economics of ranching. The DEIS does state that PRNS leases contribute up to 0.03% to the local economy. The DEIS should include a section on agricultural economics. Ranches at Point Reyes obviously have a difficult time competing with the large agribusiness operations in other parts of California. The DEIS seems to indicate that when ranch families abandon or otherwise terminate, leases can subsequently be issued to new non-related lessees. Individual new ranch leases seem to be counter to the intent of Point Reyes National Seashore, a suburban coastal park receiving heavy recreational use. My understanding was the original intent of the enabling legislation was to assure the families who then owned these lands that they would be able to remain ranching on these properties, not that ranching was to become a permanent feature of the national park.

Alt B, the new Ranchland Zone 28,700 acres seems to be the enhanced business as usual alternative. Some form of Alternative E could gradually eliminate dairying here while preserving beef cattle and it seems to make most sense in the short to near term. Thank you for considering my comments.

Tom Gaman

#6776

Name: N/A, N/A

Correspondence: Please protect all of the native wildlife in point Reyes like Tule Elk from being killed to promote cattle grazing.

#6777

Name: Bouley, Kenneth

Correspondence: Since I am genuinely concerned about the future and health of Point Reyes National Seashore, and the environment more generally, I read the General Management Plan Amendment Draft Environmental Impact Statement very carefully and took seriously the instructions regarding what constitutes a substantive comment. I own a home in Inverness and my small lot borders park land. My wife and I visit the Park regularly, to hike and take pictures. We enjoy the trails and beaches, and especially the birds and other wildlife. I am not in a position to question the accuracy of the EIS, or its assumptions or methodology. I have no new information and don't expect my comments to result in revisions to the existing alternatives.

However, I do question the adequacy of the document on the grounds that it has inexplicably expressed a plainly irresponsible preference among the alternatives included. I also have three additional alternatives which I hope will be considered. Whereas the Environmental Consequences section says:

- Soils - "Under alternative F, cessation of ranching would eliminate all impacts on soils associated with ranching activities."
- Water Quality - "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."
- Vegetation – "Under alternatives D and F, vegetation composition would likely change in areas where ranching is removed. In these areas, while the cessation of grazing would eliminate adverse impacts such as high-intensity-use areas...impacts on other federally listed plants that occur in certain habitat, such as dune or serpentine habitat, may be beneficial because the potential for cattle to trample individual plants would be reduced... Elk management actions under alternatives B, C, and D could result in highly localized impacts because of trampling." And although this section indicates that "Eliminating livestock grazing could also adversely affect several federally listed plants that occur in coastal grassland because grazing is the most effective tool for promoting their persistence with respect to competition with other non-native grassland species," it does so without recognizing the role grazing plays in spreading the invasive species in the first place.
- Wildlife – "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 and would reduce high-intensity-use areas compared to existing conditions."
- Tule Elk – "Alternative F would eliminate impacts on elk related to hazing and fencing and would allow for the free-range population to expand across the planning area." [And would not call for the lethal removal of any elk.]
- Air Quality – "Alternative F would phase out ranching, ending ranching-related emissions of criteria pollutants."

The document nonetheless identifies option B (having none of the benefits or alleviations listed above) as the preferred alternative. But why?? It is a non-sequitur, a blatant, political path-of-least-resistance, a conscienceless abdication of leadership responsibility, and an abject breach of public trust.

Even setting aside the morally indefensible "removal" and "management" of the tule elk (which I believe much of the public is unwilling to do), the perpetuation and in fact enshrining of the public sponsorship of private-for-

profit degradation of the environment, is shortsighted, negligent, and mortgages the future of generations who might otherwise be inspired by a braver, more principled recommendation.

For example, what does it do to the resolve of a young person to forego convenience for a greener choice (in job commuting, in diet, in consumer choice, etc.) to see a federal agency squander an opportunity to make a difference exponentially greater than one's individual choices could ever accrue? In other words, why should I reduce, reuse, recycle, or bicycle to work, etc., if the National Park Service cannot even decrease methane emissions on its own lands (our own lands)?

The Park Service proposes to kill native tule elk and haze them off 18,000 acres of the park to allow private ranchers' cattle sole access to these public lands. Under this plan, enough tule elk would be killed to establish an arbitrary 120-member population threshold for the Drakes Beach herd. This free-roaming herd currently has 124 elk and has been slowly expanding. This is the only National Park where tule elk occur, and the reintroduction of tule elk to the Point Reyes peninsula has so far been a success story for the conservation of native species and restoring ecosystems. This proposed alternative is not in keeping with the mission of the National Park Service and blatantly undermines the success of the tule elk reintroduction – a program that has possibly prevented the extinction of the species. Why would the NPS do anything to undermine this success?

Twenty-four families and 63 jobs do not justify yet more degradation of everyone's air, soil, and water quality and the sacrifice via opportunity cost of potential healthy open space, with its benefits to people and non-human nature alike. Hopefully no arguments around "balance" – say between tourism and agriculture, or between nature and people, dampen any of the foregoing. Surely anyone associated with the National Park system realizes that, especially in the face of the intractable and increasingly insurmountable climate crisis, any regard for "balance" – real balance long since in our rear view mirror – mandates aggressive advocacy of wilderness and curtailment of industries like ranching, forestry, mining, trapping, et al, which are only anachronistically covered by the veneer of tradition and romanticism. The baseline has shifted, and plan B would shift it again.

Here is a story from August 8, 2019, the opening day of the public comment period for this EIS. "Plant-based diet can fight climate change – UN" (<https://www.bbc.com/news/science-environment-49238749>). It is very, very easy to discover similar studies and observations comprising the emerged (not emerging) scientific consensus that climate change is grave and livestock agriculture is heavily implicated.

So, the urgency of the degradation of the environment, and especially the climate crisis, is not in question (since I started drafting these comments, the Amazon has caught fire.) The best alternative for the health of the environment is not in question, per the EIS itself. Why would the Park Service recommend any other option? Presumably it is bending to local and congressional pressure, the latter expressed baldly in the cited Joint Explanatory Statement from last February, which states "The Conferees . . . expect the Service to make every effort to finalize a General Management Plan Amendment that continues these historic activities."

But the Joint Explanatory Statement also describes ranching and dairying as ecologically "important." This of course is in direct contradiction to the findings of the EIS itself (unless "important" is understood as endorsement-neutral, the way coal mines are "important" to air quality and slavery was "important" to the economy.)

Given this contradiction, and given the cited Enabling Legislations which in 1962 required the NPS to "preserve the recreation area, as far as possible, in its natural setting, and protect it from development and uses which would destroy the scenic beauty and natural character of the area" and in 1976 to "administer Point Reyes 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, and based upon, and supportive of the maximum protection, restoration, and preservation of the natural environment within the area," the Park's preferred option clearly should be F, not B.

The 1962 and 1972 verbiage represent legal mandates. The 1978 amendments merely allow the Park to reissue leases (they don't require or even recommend it). The 2019 Joint Explanatory Statement is not a legally binding directive and whereas it is supposed to clarify earlier intent, it does so by contradicting it.

Furthermore, whereas the plan includes vague aspirational management guidelines to protect natural resources from damage from cattle grazing and ranching, the Park Service has been unable and/or unwilling to enforce many of the current grazing lease conditions. The preferred alternative would authorize excessive levels of cattle stocking that have already led to overgrazing, resulting in significant soil erosion, degradation of water quality, damage to endangered species habitat and the spread of invasive plants in the park. This is clearly not "supportive of the maximum protection, restoration, and preservation of the natural environment." It's just not.

Contrast the damaging extension and expansion of ranching with other actions taken by the Park that are in keeping with its charter. For example, when elephant seal numbers rose such that larger areas of beaches are occasionally occupied by them, the Park closes those beaches to tourists. Where endangered Snowy Plovers are known to nest, the park ropes off those areas to tourists and their dogs. But where native tule elk transgress on a ranch operation, the park's preferred approach is lethal removal.

Besides alternative B not having the many significant benefits anticipated under alternative F, there is a certain major worry it brings. As far as I am aware, resident predators like coyotes and bobcats do not threaten the livestock in the ranches and dairies. However, they certainly will be tempted by chickens and pigs that B would allow. Weasels, badgers, and long-tailed weasels may threaten chickens. Coyotes may be attracted to sheep and goats, and the few mountain lions that are known to range into the park may be attracted to all these proposed new livestock. As far as I know, there are no baseline studies or surveys on predator numbers and distributions in the Park. These should be pre-requisites to even consider diversifying livestock. And although alternative B is explicit that "no predator management would be allowed," it is gullible to think that'll do, that there won't be conflict between these livestock and the wild predators in the park. The history of livestock in California and the West in general is that of devastation of coyotes, wolves and mountain lions via depredation permits (not to mention the toll of poisons and traps and non-agency, vigilante predator removal.) If it is expected that depredation permits will never be issued, that enclosures and guard animals will absolutely prevent depredation, or that ranchers will passively accept financial losses to whatever depredation does occur, this is naive. After all, even though the current leases explicitly mention that occasional damage from wildlife should be expected (e.g. Section 17, Wildlife Protection, Rossi lease, AGR 8530-1000-3019), this hasn't thwarted momentum towards plans that will involve killing large numbers of animals. While the science regarding the disruptive consequences of predator removal to ecosystems' health is clear, the park is already sliding down the slippery slope of killing wildlife to protect private profit. And if you can kill scores of native tule elk to protect cattle, surely you can kill a few coyotes and long-tailed weasels to protect chickens and pigs. If the ranches can convince the Park to expand the damaging commercial use of the park lands in direct contradiction to its charter, how long before they convince it to "remove" a few "nuisance" bobcats?

Those are my comments on the EIS as it stands, including its preferred alternative. Here are additional alternatives that I hope may be considered:

G – offer renewed leases to existing beef and dairy ranching in PRNS at market rates per acre and valuated associated services, and use the additional revenues to mitigate impacts of the same and enhance wilderness quality in the park and nearby; these activities to include increased oversight of existing ranching operations to ensure compliance to existing and additional environmental rules. If the carrying capacity of the land is not to be exceeded, additional rules should prohibit the import of water, food or other operational materials ongoing to sustain the livestock. Ranches in PRNS pay less than half of fair market cost to ranch there. (Link)

H - offer renewed leases to existing beef and dairy ranching in PRNS at real costs per acre and valuated associated services and use the additional revenues to mitigate impacts of the same and enhance wilderness quality in the park and nearby. Real costs would include opportunity costs (i.e. market rates for the lease of public lands) as well as public costs (what industry calls "externalized" costs) associated with soil, water, and air quality impacts. This is

alternative G with per acre rate adjusted higher according to requisite analysis of fully loaded cost to the public for the ill effects caused by beef/dairy ranching. It may be difficult to quantify those costs, but appraisals and compromises could be made, and anyway the ranches are not going to agree to this if option G, which is cheaper by definition, is on offer – they could always throw their lot into the free market.

I – buy out the ranches to clear the way for alternative F. Anticipating that the opposition to alternative F (or really, C on up, including my G and H) will be from the ranches themselves and their promoters, the approach here is to ask the commercial stakeholders to simply name their price. This may be their subsurface plan anyway, although in a hypothetical negotiation, the Park's stated preference for alternative B certainly hinders the park and the public (and the elk, and the environment on the whole).

Opposition to this alternative would likely come from environmental groups and/or, who may awkwardly point out that the ranches were already bought out, some time ago. The 1962 Enabling Legislation after all states, "Except for property which the Secretary specifically determines is needed for interpretive or resources management purposes of the seashore, the owner of improved property or of agricultural property . . . may, as a condition of such acquisition, retain for himself and his or her heirs and assigns a right of use and occupancy for a definite term of not more than twenty-five years, or, in lieu thereof, for a term ending at the death of the owner or the death of his or her spouse, whichever is later."

But the difference between a lucrative (second) buyout and a transition cost mitigation is a quantitative one, a gray question, where views will differ. In the end, to get things done, if the guiding principle is "everyone has their price," then so be it. Also, it should be noted that removing ranching from the Park may cause financial difficulties for current ranch and dairy employees. Money should be allocated to mitigate these difficulties, and transition the and employees to other jobs with requisite services like job placement, training, etc. Funds to buy out the ranches could initially be raised through entrance fees to PRNS. As a local who enters the park frequently, I can say that although I enjoy the absence of a gate at the park's entrance, I would gladly stop, wait, and pay if once I entered, I enjoyed a landscape free of blights, eyesores, and stench perpetrated by the ranches and dairies. Of course, there may be a monetary shortfall here, and it may take creative financial structuring to achieve. But if it is an accounting problem, let us treat it as such.

In Summary, • I believe preferred alternative B is an indefensible choice even accepting prima facie all data and conclusions in the EIS. • Alternative B is clearly not "supportive of the maximum protection, restoration, and preservation of the natural environment," meaning the Park intends to violate its legally binding charter. • The GMP EIS should include a Justification section, explaining to the public why the Park is expressing the preference it is. • Option F is the environmentally responsible option and something very much like it should be preferred (and then enacted) for the sake of wildlife and future human generations.

Sincerely, Kenneth Bouley

#6778

Name: Insull-McCarthy, Jennifer

Correspondence: I am writing to urge the National Park Service to discontinue the grazing of beef and dairy cattle at Point Reyes National Seashore. This precious area has been damaged by livestock grazing which poses a threat to the environment and local wildlife and it should be protected and used to serve the public good, and not for the benefit of the livestock industry.

I strongly oppose Option B and any other proposal that would be fatal to Tule Elk or other wildlife to the benefit of ranching operations, and encourage the agency to adopt Option F to discontinue grazing and allow members of the public to enjoy this beautiful park and to be enriched with opportunities to visit and appreciate this special place.

#6779

Name: Robertson , Linda

Correspondence: Dear NPS -

Please discontinue the grazing of beef and dairy cattle at Point Reyes National Seashore. This area has been damaged because of it, posing a threat to the environment and local wildlife and it should be protected and used to serve the public good, not for the benefit of the livestock industry.

I strongly oppose Option B and any other proposal that would be fatal to Tule Elk or other wildlife. Stop supporting the ranching industry. Please adopt Option F to discontinue grazing and allow members of the public to enjoy this beautiful park and the wildlife that belongs there.

#6780

Name: Croker, Bonnie

Correspondence: Please do not renew leases for cattle grazing. Let native species live naturally in the environment.

#6781

Name: Fleming, Tony

Correspondence: The proposed plan for expanding ranching at Pt Reyes Natl Seashore should be trashed! The ranches should be completely eliminated by the NPS as was intended. Cattle ranching is one of the main causes of Climate Change. The ranching fences should all be torn out and the Tule Elk and wildlife set free on the peninsula. The NPS should protect all wild species and land from human greed. I've been going to Pt Reyes since the 1960's and am still waiting for the change as President Kennedy and Congress wanted. Thank You-

#6782

Name: Goshar, Vishal

Correspondence: As a member of the California-based international animal protection nonprofit organization In Defense of Animals with over 250,000 supporters, I oppose the National Park Service plan to kill native Tule elk, grow commercial crops, and permit ranchers to add chickens, turkeys, sheep, pigs, and goats to their exploitative operations. For this reason, I support Alternative F.

As national park land, this property was specifically set aside to protect, restore, and preserve the natural environment including the wild animals who live there. The original intention was to phase out dairy and cattle ranching, not add more crops or animals to increase ranching profits.

The proposed plan does not address the damage from grazing, including water-quality degradation and soil erosion. Also, adding new crops will create more conflicts with native wild animals.

Please abandon this inhumane and destructive plan by selecting Alternative F. I urge you to restore the Seashore's Pastoral Zone for wild animal habitat and repurpose historic ranch buildings for scientific research, interpretation, and public education.

#6783

Name: Deshayes, Kurt

Correspondence: I find the use of private lands by private ranching to be a total misuse of the Federal Government's mandate to manage public lands in the best interest of the citizens of the United States. It is imperative that proposition F is implemented as soon as possible. The time limit for grazing cattle at Point Reyes ran out decades ago and the land should be managed in order to introduce indigenous species such as Tule Elk and

not spoiled through industrial farming. If grazing leases are extended it will be against the wishes of the majority of people. It is time the many are put ahead of the wealthy few.

#6784

Name: M. , Ramie

Correspondence: I think the NPS-preferred option overlooks the exceptionalism of the Drakes Beach area. It's a place for so many animals that almost became extinct, and I get to see some of them on almost every visit - elephant seals, whales, murrelets, and tule elk - and sometimes peregrines, river otters, mt lions, and others. Not to mention the outstanding vistas, flora, and other fauna. Cows completely do not belong in that wild place. It's like having cows instead of bison in core Yellowstone. Plus all the damage they do to the ecosystem. (BTW, after all these years, I still see dark brown cow poop run-off blatantly flowing right across Drakes Beach into the Bay just a few hundred feet from the Visitor Center, and into the pond by its parking lot.) The ranchers have long known they were phasing out - until the rules got changed by - people who have never or only rarely been to Pt Reyes? Actually, there could be a small number of bovines in the Drakes Beach area - but, in a nod to the Pleistocene grasslands - make them long-horned cattle, yaks, or bison. Ranching history has been adequately preserved at Pierce Point Ranch, please make that your ranching focus. Also, regarding diseases - as the elk most likely contracted them from the cattle, that should weigh in favor of the elk.

#6785

Name: Brady, Thomas

Correspondence: Enough is enough. The ranches were supposed to be phased out and the land was supposed to go wild again years ago. This is Public land, for wild life and the public, not for greed of private ranchers. Enough of republican greed and the weasel behavior of one lousy turncoat democrat. Do the right thing. this is California, not Texas.

#6786

Name: N/A, Tammy

Correspondence: Point Reyes National Seashore is supposed to be managed under the Point Reyes Act for "maximum protection, restoration, and preservation of the natural environment." There's no mandate for prioritizing commercial agricultural leases on these public lands. • Natural values, native wildlife, public access and enjoyment should take priority over commercial activities at Point Reyes. • Tule elk are an important part of the landscape at Point Reyes. Their recovery is a result of successful native ecosystem restoration, which is a key element of the Park Service's mission. It's taken a lot of time, money and effort to restore tule elk to Point Reyes, the only national park where they live. Tule elk should be allowed to roam free and forage in the park - not shot, removed, fenced or treated as problem animals. • Right now the Point Reyes ranches enjoy not only subsidized grazing fees and housing, but also taxpayer-funded infrastructure and road improvements, and publicly funded projects. But commercial activities at Point Reyes should be required to accommodate native wildlife - not the other way around. • The Park Service shouldn't allow any new agricultural activities at Point Reyes. Planting artichokes or other row crops will attract birds. And introducing sheep, goats, pigs or chickens will attract native predators such as coyotes, bobcats and foxes. Expanded ranching would only create new wildlife conflicts. • Cattle ranching should only be allowed if it's consistent with preserving the natural environment. And agricultural activities such as mowing shouldn't be allowed in park areas where they harm endangered species or wildlife habitat, impair water quality, cause excessive erosion or spread invasive plants/diseases. • Cattle are the seashore's primary source of greenhouse gases. So the Park Service's preferred alternative is inconsistent with its own "Climate Friendly Parks

#6787

Name: Herink, Max and Mary



Correspondence: Why do ranchers and big money men ALWAYS get their way with YOU! The elk are beautiful and should be left in their environment! Get the ranchers to move for a change. Sometimes money should not win!

#6788

Name: Lauren, S.

Correspondence: Please do not kill the tule elk or destroy their habitat! They are some of the rare natural wonders that make our country great. Cows can graze in so many places, but these elk cannot. We need to protect them or future generations will be deprived of these special creatures. I am a Californian and want to see our state's natural bounty preserved, not destroyed.

#6789

Name: Batcheller, Kathleen

Correspondence: Cattle ranchers should not be allowed to continue to graze cattle at Point Reyes National Seashore in Marin County, CA. These cattle are disruptive and harmful to the natural ecosystem in the park. Furthermore, it is a public park, and private businesses should not be allowed to exploit public resources. Finally, the meat industry is destructive to the survival of the planet, causing well documented harm to the environment. Please DO NOT renew the cattle ranchers' leases.

#6790

Name: Hillshafer, Linda

Correspondence: We do not need more cattle. We do not need more artichokes. We especially do not need to exterminate one of the rarest forms of elk still surviving.

#6791

Name: N/A, N/A

Correspondence: Hello,

Tule elk are an important part of the landscape at Point Reyes. Their recovery is a result of successful native ecosystem restoration, which is a key element of the Park Service's mission. It's taken a lot of time, money and effort to restore tule elk to Point Reyes, the only national park where they live. Tule elk should be allowed to roam free and forage in the park - not shot, removed, fenced or treated as problem animals.

Right now the Point Reyes ranches enjoy not only subsidized grazing fees and housing, but also taxpayer-funded infrastructure and road improvements, and publicly funded projects. But commercial activities at Point Reyes should be required to accommodate native wildlife - not the other way around.

Please don't kill the tule elk.

Thank you, Jan Walters

#6792

Name: N/A, N/A

Correspondence: I am writing to urge the National Park Service to discontinue the grazing of beef and dairy cattle at Point Reyes National Seashore. This precious area has been damaged by livestock grazing which poses a threat to the environment and local wildlife and it should be protected and used to serve the public good, and not for the benefit of the livestock industry.

I strongly oppose Option B and any other proposal that would be fatal to Tule Elk or other wildlife to the benefit of ranching operations, and encourage the agency to adopt Option F to discontinue grazing and allow members of the public to enjoy this beautiful park and to be enriched with opportunities to visit and appreciate this special place.

#6793

Name: STOUT, MEREDITH

Correspondence: Pt. Reyes is a precious preserve in Northern California. Please do not allow the extension of leasing of public lands to cattle grazing, or other commercial agricultural pursuit. I also have heard that you are considering expanding the type of commercial farming activity, i.e., diversification of farming species, to occur on public lands at Point Reyes seashore. Instead, I urge you to adopt Alternative F of the proposals, phasing out ranching, and managing the land, water and wildlife.

#6794

Name: Pratt, Ruth

Correspondence: Specific Comments:

The proposed General Management Plan Amendment (GMPA) and Draft EIS (DEIS) are inadequate because they do not include a least environmentally damaging and fair alternative and, therefore, should be revised. When Point Reyes National Seashore (PRNS) was established, the ranchers were compensated for their land with the agreement they could remain in the park for their lifetime or 25 years. At that time, ranchers acknowledged that future ranching was not compatible with public land ownership. Since then, leases have been extended to ranchers' offspring until they chose to discontinue ranching. Therefore, I recommend Alternative F (Discontinue Ranching), the only alternative which honors the history of these agreements and protects the natural resource values that PRNS was created to preserve, including Tule Elk. However, a 5-year phase-out of these agreements may not be feasible. To address this issue, the revised GMPA and DEIS should include a preferred alternative that discontinues ranching and explains whether certain landowners may need more than 5 years to phase out their operations. This would allow the gradual phase-out of historic ranches as intended and give existing leaseholders time to plan relocation, as was done with the Drakes Bay Oyster Company. The revised Alternative F should also clearly explain what "visitor opportunities" would be allowed and associated impacts to natural resources.

The DEIS acknowledges that the Seashore's land, water and wildlife would benefit if ranching were to cease but does not include measures to protect fish and wildlife resources from ranching's impacts or mitigation for habitat loss from cattle grazing or crop production. The revised GMPA and DEIS should include a discussion of the management costs and restoration needs at PRNS, including waterways, its historical coastal prairie grasslands, and other habitats.

To acknowledge the historical and cultural heritage of ranching at PRNS, the revised documents should focus on preservation of (and interpretive panels at) historic buildings.

General Comments:

Alternative B (NPS preferred alternative) would cause unacceptable adverse impacts to habitat for fish and wildlife resources of the PRNS. Today, ranches and grazing land take up about one-third of the Park's 75,000 acres. These activities cause loss of native plants, polluted runoff to streams which support endangered coho salmon and threatened steelhead trout, and fencing of migratory corridors for local wildlife species. It would continue lease terms up to 20 years, allow more intensive agriculture and commercial livestock with "diversification" (pigs, goats, sheep and row crops), and allow killing of the Tule Elk herd beyond a population of 120. Impacts to natural resources from these diversification activities should be clearly explained in the revised GMPA and DEIS.

Alternative C (removal of elk) is outrageous and would violate the 1962 enabling legislation of the PRNS to save and preserve this iconic and legally-protected species for future generations.

Alternatives D and E (reduced ranching) would allow diversification and 20-year leases; Alternative E would also allow the six active dairy ranches to convert to beef which is unacceptable. As you know, the existential threat of our time is climate change. Methane from both dairy and cattle ranches are huge contributors to global warming. And it is imperative that we convert to a plant-based diet, as recommended by the 2019 International Climate Change report. The Trump administration has lodged egregious assaults on our environment, including the EPA, our national parks, and most recently the Endangered Species Act. And I believe it is hypocritical for Congressman Huffman (Vice Ranking Member of the House of Representatives Natural Resources Committee) to say he supports the "Green New Deal" legislation currently being considered by the U.S. House of Representatives while also sponsoring H.R. 6687 to extend the PRNS ranching leases to 20 years. Please do not let politics get in the way of the NPS enabling legislation (Organic Act of 1916) to leave our parklands unimpaired for the enjoyment of future generations.

#6795

Name: N/A, N/A

Correspondence: Dear Park Service Members,

Please do not allow profit and exploitation take over life. Nature cannot survive without the native wildlife that make it possible. And human beings cannot survive without mother nature. Today, eating other animals and their secretions are unnecessary and harmful. Tourism would generate more funds while being sustainable and respectful by maintaining natural relationships. As livestock is the leading cause of green house emissions- --far outnumbering all the world's transportation sector.

With 7.5 billion human beings and only continuing to rise, what we consume must be ecologically sustainable and ethically justifiable.

Kindness toward fellow non- human animals will only increase kindness toward fellow humans. One does not have to love another animal but to respect that their life matters to them.

Take much care of each other.

M

#6796

Name: Hyde, Jen

Correspondence: Animal agriculture is out of control and destroying the habitats of wild animals around the globe. Farmers and consumers do not pay the external environmental costs-please stop them from ruining more public lands.

I am writing to urge the National Park Service to discontinue the grazing of beef and dairy cattle at Point Reyes National Seashore. This precious area has been damaged by livestock grazing which poses a threat to the environment and local wildlife and it should be protected and used to serve the public good, and not for the benefit of the livestock industry.

I strongly oppose Option B and any other proposal that would be fatal to Tule Elk or other wildlife to the benefit of ranching operations, and encourage the agency to adopt Option F to discontinue grazing and allow members of the public to enjoy this beautiful park and to be enriched with opportunities to visit and appreciate this special place.

#6797

Name: N/A, Prachi

Correspondence: I urge you to select Alternative F for the following reasons:

**Diversification:** This is included in all the alternatives except No Action (A) and No Ranching (F). It allows each rancher to add crops and small livestock-pigs, sheep, goats, and up to 500 chickens-to their operations. There is no discussion of the impacts of this expanded agriculture on the park's wildlife or natural resources, such as what happens should park predators take chickens, lambs or other small livestock. The plan takes a "wait and see" approach.

**Historic and cultural resources:** The NPS cites its obligation to preserve historic and cultural resources. The ranch buildings and infrastructure are historic, not the cows. It's neither required nor necessary to permit 6,000 cattle in the park or allow additional agriculture that never before existed at the Seashore in order to preserve the Seashore's history. This can be done through interpretation. Interpretation of ranching has never been conducted at the Seashore-historic, cultural or otherwise, other than at Pierce Point, a non-working ranch at Tomales Point. The public has historically been unwelcome at the ranches, some of which have posted No Trespassing signs on land that belongs to the public. Preserving and interpreting historic buildings and perhaps a cow to demonstrate how ranches historically operated, would be sufficient, thereby ending the environmental damage, climate impacts, and other public costs that commercial ranching in the Seashore exacts today.

**Succession:** The plan proposes changes regarding "succession" that would, in effect, permanently commit this national park to ranching. Allowing for "multi-generational ranching" was an early accommodation to the ranchers who sold their land for the park. In addition to generous compensation (the equivalent of \$340 million in today's dollars), ranchers were allowed to lease back their land for 25 years or their lifetime. The NPS later agreed to allow ranchers' offspring to stay on in the park as long as they continued ranching. After that, the ranches would be retired. In its "preferred alternative" (B) the NPS will not retire the ranches when the offspring of the ranchers retire. Instead, it will offer those leases to other relatives; and if they decline, to neighbors; and if they decline, to anyone who wants to lease land in the park-no prior connection to the Seashore would be required.

**Mitigation and Restoration:** More than a century of ceaseless cattle grazing has altered and diminished the natural ecosystems of the park. The EIS notes impacts to plant and animal species and their habitat from cattle grazing; water pollution from cattle manure runoff; and greenhouse gases and air pollution from cattle operations. None of the alternatives discusses the costs or timeline for mitigating these impacts. None of the alternatives considers the Seashore's restoration-what it might cost; where the NPS might focus attention; what the benefits would be to wildlife, water, climate change mitigation, or public visitation and use.

**Organic vs Sustainable:** "Organic" certifies that ranchers don't use synthetic fertilizers, pesticides, antibiotics, or hormones. Sustainable agriculture is not a certification. It is a way of life that sustains the productivity of the land for future generations and minimizes damage to the environment. Manure runoff polluting the only marine wilderness south of Alaska is not sustainable. Illegally disposing of cattle carcasses around the national seashore is not sustainable. Allowing cattle to give elk and other wildlife life-threatening diseases is not sustainable. Subsidizing and endorsing methane-producing confined animal feeding operations (CAFOs) in an era of climate change is not sustainable. Trucking hay for hundreds of miles as a supplemental feed, because pastures are overstocked and overgrazed, is not sustainable. And yet these practices continue. The cost of ranching to our park. The National Park Service has not provided any information on the dollar amount or portion of its budget that goes to ranching-related expenses. Ranching places increasing demands on dwindling park budgets, while park improvements and a backlog of maintenance, along with public programs and interpretation, go unfunded. Meanwhile, scarce resources go to support 24 ranchers operating in the Seashore, including killing wildlife to benefit their operations. Ranching's environmental impacts have an untallied economic impact on the Seashore. Internal Park Service memos indicate monitoring the ranches for lease compliance and environmental damages already places outsized demands on the Seashore's staff and budget. The NPS has failed to enforce lease

agreements when leases are violated. Can we expect that expanded agricultural practices will be met with responsible oversight with no expansion of budget to enforce these more complex leases?

Subsidizing Seashore ranchers: The NPS mission does not include guaranteeing commercial operators a living. Yet, every alternative except No Action (A) and No Ranching (F) allows “diversification” for the purpose of shoring up the ranchers’ bottom line. There is no discussion of diversification impacts to the park. Ranchers in the Seashore already have a competitive advantage over ranches outside the park. Seashore ranchers benefit from discounted grazing fees, below-market-rate housing, and maintenance and improvements to roads, homes, and farm buildings covered at public expense. Seashore ranches pay no property taxes.

Climate change: Cattle are the leading source of greenhouse gases at the Seashore. Methane, produced by cattle, is a greenhouse gas 25x-100x worse than carbon dioxide. There is no discussion of mitigation for cattle’s impacts to the climate in any of the NPS’s ranching alternatives.

Wildlife impacts: Removing native Tule elk from the park to benefit the ranchers is built into four of the NPS alternatives, including the NPS’s “preferred alternative.” The EIS says that the Seashore’s land, water and wildlife would benefit were ranching to “cease.” But there is no plan for protecting wildlife from ranching’s impacts or mitigating habitat loss from cattle grazing or growing crops. Other than killing Tule elk, there is no discussion of avoiding wildlife conflicts.

Kind Regards, Tony

#6798

Name: Plank, Deeann

Correspondence: I am writing to urge the National Park Service to discontinue the grazing of beef and dairy cattle at Point Reyes National Seashore. This precious area has been damaged by livestock grazing which poses a threat to the environment and local wildlife and it should be protected and used to serve the PUBLIC GOOD, and not for the benefit of the livestock INDUSTRY.

I strongly oppose Option B and any other proposal that would be fatal to Tule Elk or other wildlife to the benefit of ranching operations, and encourage the agency to adopt Option F to discontinue grazing and ALLOW MEMBERS OF THE PUBLIC to enjoy this beautiful park and to be enriched with opportunities to visit and appreciate this special place.

#6799

Name: Stipetic, Jennifer

Correspondence: To Whom It May Concern,

I am writing to you in opposition to the proposed plan of Government Funded killing of Point Reyes National Seashore Tule Elk. I am deeply disturbed by the Park Service even considering the proposal to kill 15 Elk each year at the request of private industry in order for these ranchers to profit from public lands. These parks are for wildlife to roam freely in a natural ecosystem, it is reckless to destroy these ecosystems with cows, sheep and other farm animals. Currently, the Point Reyes ranches enjoy subsidized grazing and housing as well as tax-payer funded infrastructure and road improvements, it should be the ranchers that accommodate the wildlife, not the other way around. The public should not be asked to fund the destruction of the park. Natural values, wildlife and public access to enjoy nature should take priority over any agricultural activities and I hope that this request by the ranches to kill the elk and expand their agricultural businesses at tax-payer expense be enthusiastically rejected.

Thank you, Jennifer Stipetic

#6800

Name: Standring, Sarah

Correspondence: PLEASE DO NOT HARM OR KILL THE NATIVE ANIMALS THAT WERE ON THIS LAND BEFORE YOU BROUGHT CATTLE. PLEASE REALIZE THAT YOU ARE KILLING THE CHANCES FOR THIS WORLD TO CONTINUE TO TURN FOR OUR GREAT GRANDCHILDREN. THERE IS AN EXCESSIVE AMOUNT OF BEEF IN THE US. AS HUMANS WE CONSUME SOOOOO MUCH MEAT IT IS DISGUSTING! DO NOT KILL THE ELK FOR CATTLE. BE SMART. THINK OF THE FUTURE. THINK OF YOUR CHILDREN.

#6801

Name: Smith, Joyce

Correspondence: I am writing to urge the National Park Service to discontinue the grazing of beef and dairy cattle at Point Reyes National Seashore. This precious area has been damaged by livestock grazing which poses a threat to the environment and local wildlife and it should be protected and used to serve the public good, and not for the benefit of the livestock industry.

I strongly oppose Option B and any other proposal that would be fatal to Tule Elk or other wildlife to the benefit of ranching operations, and encourage the agency to adopt Option F to discontinue grazing and allow members of the public to enjoy this beautiful park and to be enriched with opportunities to visit and appreciate this special place.

There is plenty of BLM land for them to choose from.

#6802

Name: Dykoski, William

Correspondence: Natural values, native wildlife, public access and enjoyment should take priority over commercial activities at Point Reyes.

#6803

Name: Morris, Gayle

Correspondence: This is a despicable consideration. Enough is enough with killing wildlife. Cattle raising is out of control and stop this!

#6804

Name: Gordon, Donna

Correspondence: Leave the tule elk lone on California's lands.proectall r wildlife. Get your act together and stop destroping US national assets.

#6805

Name: Paskowitz, Nancy

Correspondence: I am writing today to urge the National Park Service to adopt Alternative F, which would discontinue farming and ranching opportunities in the park and expand visitor opportunities.

The Preservation of native wild species must take precedence over farming and ranching activities. Grazing negatively affects ecosystems, causing water pollution and soil erosion, spreading invasive species and disease, and harming endangered species.

#6806

Name: Schmidt, Kelly

Correspondence: I would like to choose alternative F in defense of the Tule Elk who call this place home.

#6807

Name: Ray, Paula

Correspondence: I support Alt F; ranches have no place in a national park. Save the Elk.

#6808

Name: Hamblin, Sheryl

Correspondence: Please understand, I have sympathy with the ranchers and their need to make a profit, but when their business model is based on the over use and desecration of public land I draw the line in favor of native wildlife. If these ranchers wish to expand their business, let them purchase private property to increase their herds, and add additional species of livestock. The Tule Elk has had a difficult time surviving as it is, without sanctioned slaughter. This land is their heritage range, from antiquity and humans have no business disturbing their herds.

#6809

Name: N/A, N/A

Correspondence: I am writing to urge the National Park Service to discontinue the grazing of beef and dairy cattle at Point Reyes National Seashore. This precious area has been damaged by livestock grazing which poses a threat to the environment and local wildlife and it should be protected and used to serve the public good, and not for the benefit of the livestock industry.

I strongly oppose Option B and any other proposal that would be fatal to Tule Elk or other wildlife to the benefit of ranching operations, and encourage the agency to adopt Option F to discontinue grazing and allow members of the public to enjoy this beautiful park and to be enriched with opportunities to visit and appreciate this special place.

#6810

Name: earle, emelie

Correspondence: Leave the elk alone please

#6811

Name: Winter, Marjorie

Correspondence: I hope that the dairy farms on Point Reyes National Seashore will be phased out as soon as possible. The leases should have been terminated 10 years after the park was formed. Instead, the dairy farms have continued to pollute nearby waters and and the cattle have continued to spread disease.

There are plenty of dairy farms in California. The National Seashore belongs to the citizens, not to individual dairy farmers. The park should be just that... a park....not a for-profit dairy farm. We have the right to clean, natural environment at Point Reyes, with adequate space for wild animals. Why should Point Reyes be the only national park that has ranches within it?

#6812

Name: Smith, Douglas

Correspondence: Thank you for the opportunity to comment unpark planning with regards to point Reyes national seashore ranching and wildlands.

My family and I strongly support plan f. and we strongly oppose all other plans. It is unconscionable to us that our national seashore would even consider diversifying agricultural interest and killing our elk in support of agricultural interest. This is not the spirit of this place. we purchased these ranches for tens of millions of dollars in the 1960s. The intention was to return the land to wild status after the families who are currently ranching ended there interest. What you are trying to do goes against the spirit of the law, the spirit of the people and their greater good. And the spirit of nature herself.

Absolutely opposed the killing of any elk. Absolutely opposed the diversification of animals and crops on ranches. Absolutely opposed allowing family ranch has to be purchased by outside interest. Absolutely opposed the anything that would further degrade our nature park. It is suffering as it is now with runoff from cows, over grazing and the stench of livestock.

Also my family and I are appalled that the preferred plan would allow camping in the very delicate drakes estero. I have spent many hours cleaning up after the oyster company thinking that it was returning to a wild land as it should be. And now we are putting tourists into this sensitive area?! And killing our beautiful elk?

Plan F. Plan F for wildlife!

#6813

Name: Collins, Amy

Correspondence: I am writing to urge the National Park Service to discontinue the grazing of beef and dairy cattle at Point Reyes National Seashore. This precious area has been damaged by livestock grazing which poses a threat to the environment and local wildlife and it should be protected and used to serve the public good, and not for the benefit of the livestock industry.

I strongly oppose Option B and any other proposal that would be fatal to Tule Elk or other wildlife to the benefit of ranching operations, and encourage the agency to adopt Option F to discontinue grazing and allow members of the public to enjoy this beautiful park and to be enriched with opportunities to visit and appreciate this special place.

Amy Collins MD

#6814

Name: Carlton, Lynette

Correspondence: I am a proponent of a compromise between open space/public access, and continued use of land that has been designated as agriculture-based. If there are issues such as pollution run-off from cattle or other livestock, let's fix that, and sustain Marin's multiple resources: hiking trails, beaches, forests, Marin Agricultural Land Trust farms, beef and dairy cattle.

#6815

Name: Scott, Jerri-Beth

Correspondence: Please do not jeopardize the lives of native species or kill them in order for ranchers and other animal agriculture businesses to use the land for grazing their livestock

#6816

Name: Eley, Patricia



Correspondence: Please save the Tule Elk! They are the local wildlife, and they deserve protection. Please don't favor cattle farmers over these residents. Humans already have enough advantages and it's not about money here. Do the right thing and say no to ranchers. Thank you. Patricia Eley

#6817

Name: Asmundsson, Sofi

Correspondence: I am writing to urge the National Park Service to discontinue the grazing of beef and dairy cattle at Point Reyes National Seashore. This precious area has been damaged by livestock grazing which poses a threat to the environment and local wildlife and it should be protected and used to serve the public good, and not for the benefit of the livestock industry.

I strongly oppose Option B and any other proposal that would be fatal to Tule Elk or other wildlife to the benefit of ranching operations, and encourage the agency to adopt Option F to discontinue grazing and allow members of the public to enjoy this beautiful park and to be enriched with opportunities to visit and appreciate this special place.

#6818

Name: Huaco , Valerie

Correspondence: Dear Sir or Madame: Please do not allow the extension of leasing of public lands to cattle grazing, or other commercial agricultural pursuit. I also have heard that you are considering expanding the type of commercial farming activity, i.e., diversification of farming species, to occur on public lands at Point Reyes seashore. Instead, I urge you to adopt Alternative F of the proposals, phasing out ranching, and managing the land, water and wildlife.

The public has already paid for this land to be kept wild. Currently, the Park Service is permitting this public land, and the native species which originally inhabited it, to be despoiled and destroyed. This is a travesty, a disgrace, and is certainly outside the bounds of the legislation which is supposed to protect the land from exploitation. The Park Service is clearly in breach of the fiduciary duty it owes to the people of the US who paid for this wild land to be set apart from exploitation. And of course, it is an utter betrayal to allow the native species to suffer and die, or to be displaced, due to what may very well be illegal exploitation of this land by commercial agribusiness.

There is no saving grace to be had in falsely identifying these commercial "farms", which are despoiling both land and species, as historical and/or bucolic! You simply must stop this activity, and allow the land to be returned to the public as was intended and authorized under the law. Please adhere to your responsibility on this matter, and reverse current plans to expand these destructive practices! Do what you are charged to do under law! Very truly yours, Valerie Huaco

#6819

Name: Rodriguez, Kristin

Correspondence: Please stop the cattle grazing on public lands. They pose a threat to the environment and cattle ranching often impacts local wildlife by displacing wild animals and ranchers killing predators. Manure from cows can be an environment hazard and cause issues with water safety and pollution. Meat production is a major contributor to global warming and I do not want public lands or funds continuing to support these practices.

I took a trip to the ocean earlier this year and I was so thrilled to see the Tule Elk grazing in fields. They were magnificent. Not so thrilled to see cattle everywhere and funky fencing to keep them contained. It disrupted the view and made it seem less wild and free.

Please protect wildlife, the environment, and the scenic views by stopping cattle ranching on public lands.

#6820

Name: Young, Lindsay

Correspondence: I am writing to urge the National Park Service to discontinue the grazing of beef and dairy cattle at Point Reyes National Seashore. This precious area has been damaged by livestock grazing which poses a threat to the environment and local wildlife and it should be protected and used to serve the public good, and not for the benefit of the livestock industry.

I strongly oppose Option B and any other proposal that would be fatal to Tule Elk or other wildlife to the benefit of ranching operations, and encourage the agency to adopt Option F to discontinue grazing and allow members of the public to enjoy this beautiful park and to be enriched with opportunities to visit and appreciate this special place.

#6821

Name: Hoffman, Jeff

Correspondence: I have visited Point Reyes National Seashore (Seashore) on multiple occasions. While the natural portions of the Seashore are beautiful and wonderful, the portions that contain cattle are like a wasteland, devoid of most native life with the vegetation almost completely removed.

Your Environmental Impact Statement (EIS) failed to adequately many of the substantial negative environmental impacts of allowing cattle to graze and otherwise be present in the Point Reyes National Seashore. The following are some of those impacts. These impacts apply specifically to the Seashore, in addition to applying to the entire western U.S.

Cattle are non-native animals and displace the native ungulates by their mere presence. This loss of native ungulates is per se a significant negative environmental impact.

Cattle destroy native grasses in the western U.S. because they overgraze the land. Western grasses have horizontal root systems and did not evolve with heavy grazing. Cattle pull western grasses out by the roots, killing them and not allowing them to grow back. Moreover, while native predators keep native ungulates moving, cattle remain in the same places for long periods of time and return to them repeatedly. Again, the land did not evolve with this kind of ungulate behavior and forcing it upon the land causes substantial harm. These direct harms to the soil and the plants that depend on it are substantial negative environmental impacts.

The ranchers want to kill native elk in order to maintain or increase their cattle. This direct killing of native elk, who exist in very small numbers compared to their historical pre-Colombian numbers, is substantial negative environmental impact per se and by definition.

Ranchers kill native plants and grasses and replace them with non-native ones for their cattle to graze. Killing and replacing native plants is a substantial negative environmental impact harm to the plants and their ecosystems per se and by definition, and also one to the native animals who depend on those plants.

Cattle are much heavier than the native animals that evolved in the Seashore and compact the land unnaturally. This substantial negative environmental impact harms the soil and the plants that grow on it.

The manure from the cattle in the Seashore is also polluting the water in the area with toxic microorganisms. This pollution harms the fish and marine mammals in the area and is thus a substantial negative environmental impact.

I visit Point Reyes Seashore to enjoy the land, water, and native plants and animals. The cattle and the substantial environmental harms that they have caused and are still causing is a very negative experience when I visit.

I therefore urge you to choose Alternative F, which would remove all of the cattle from the Seashore. The ranchers still leasing OUR land in the Seashore have been very well paid for our land, and they have no right to continue to destroy it. Their cattle should be removed completely and as soon as possible.

#6822

Name: Dids, Suzied

Correspondence: It is appalling and WRONG to prioritize commercial processes over natural ones in the GGNRA. That's antithetical to the whole reason for the park. STOP MURDERING wild animals for the benefit of a few.

#6823

Name: Galt, Forrest

Correspondence: By Forrest Galt

The dairy ranches out at Point Reyes were started in the 1850s, a time when California was a new land for settlers to take whatever they wanted at whatever the environmental cost, without thought of preservation.

Clear cutting of forests, horrific environmentally damaging mining tactics, hunting of animals to near extinction were commonplace. Now the Central Valley, East Bay, and Santa Clara valleys are completely overdeveloped with little preservation of nature and home to 10 million people and thousands of businesses. It is a tragic mess that will only get worse. The population needs and must have a sacred place in nature, a vast expanse to enjoy and give hope to the future. That place is Point Reyes National Seashore.

The Press Democrat article on August 9, 2019 Elk Plan Revives Debate indicates that 5,400 beef and dairy cattle enjoy 26,000 federally owned acres complete with barbed wire fencing. This is prime California coastal real estate, so unique to the entire California coast and still accessible to millions of people within a 1 - 3-hour drive. The article indicated that 2.5 million people visited Point Reyes National Seashore last year. Park Superintendent Cicely Muldoon stated in the article that ranches are a cultural resource that merits preservation. No, it does not merit preservation. No more than open-pit mining merits preservation.

What merits preservation is Point Reyes National Seashore back to its original pristine condition. It is enormously discouraging to look at miles of barbed wire fencing along the roadway while trying to enjoy the park. Plus, the additional eyesore of the poor condition of the dairy ranch houses and barns. Especially on the way out the lighthouse.

Because of climate change, smog, overcrowding of cities and the state, people need and must have a nearby National Park dedicated solely to the purpose of conservation and the natural environment. Where else can you go? Point Reyes is a national treasure. Lets fix this now for future generations. Dairy and ranching have enjoyed 170 years in Point Reyes. But now it is time for it to leave. This land belongs to everyone, not just 24 families. So please, free 26,000 acres and return it to the natural environment. Thank you.

#6824

Name: N/A, N/A

Correspondence: I am writing to urge the National Park Service to discontinue the grazing of beef and dairy cattle at Point Reyes National Seashore. This precious area has been damaged by livestock grazing which poses a threat to the environment and local wildlife and it should be protected and used to serve the public good, and not for the benefit of the livestock industry.

I strongly oppose Option B and any other proposal that would be fatal to Tule Elk or other wildlife to the benefit of ranching operations, and encourage the agency to adopt Option F to discontinue grazing and allow members of

the public to enjoy this beautiful park and to be enriched with opportunities to visit and appreciate this special place.

#6825

Name: N/A, N/A

Correspondence: As someone who has been visiting Point Reyes since childhood, it is my hope that the dairy farms on Point Reyes National Seashore can be phased out in the near future. Point Reyes is a treasure of Northern California and a true sanctuary for the elk and other animals who inhabit its land and water. The dairy farms pollute the waters, mar the landscape, and take land away from the park and its beautiful wilderness. Please let the National Seashore belong to the citizens and the wild animals and not to individuals who farm for profit.

#6826

Name: Corn, Mike

Correspondence: Thank you for the opportunity to comment on this proposed management change. Unfortunately, it is a harebrained idea.

First and foremost, these are public lands, which are dedicated to public resources. Private grazing ventures are not in the public's interest. So, as you might guess, I think it is sheer folly to lethally eliminate a single tule elk to make room for a single cow. There is plenty of grazing land out there, and this is simply an opportunity for private ranchers to make more money at the public trough.

So, rather than take steps to open grazing, it should be limited so even more tule elk may be supported.

As I said, I'm opposed to your foolish proposal.

Thank you.

#6827

Name: Osajima, Amy

Correspondence: I don't understand why cattle ranching is even allowed on public lands. Right now the Point Reyes ranches enjoy not only subsidized grazing fees and housing, but also taxpayer-funded infrastructure and road improvements. Commercial activities at Point Reyes should be required to accommodate native wildlife - not the other way around.

Agricultural activities such as mowing shouldn't be allowed in park areas where they harm endangered species or wildlife habitat, impair water quality, cause excessive erosion or spread invasive plants/diseases. Planting artichokes or other row crops will attract birds. And introducing sheep, goats, pigs or chickens will attract native predators such as coyotes, bobcats and foxes. Expanded ranching would only create new wildlife conflicts. This is so obvious that we can only conclude that the National Park Service really has no interest in preserving wildlife and wild lands. Show us that you aren't in the pockets of ranchers. Show us that your "Climate Friendly Parks" plan isn't a ruse.

#6828

Name: Hellgrath, Star

Correspondence: I am writing to urge the National Park Service to discontinue the grazing of beef and dairy cattle at Point Reyes National Seashore. This precious area has been damaged by livestock grazing which poses a threat

to the environment and local wildlife and it should be protected and used to serve the public good, and not for the benefit of the livestock industry.

I strongly oppose Option B and any other proposal that would be fatal to Tule Elk or other wildlife to the benefit of ranching operations, and encourage the agency to adopt Option F to discontinue grazing and allow members of the public to enjoy this beautiful park and to be enriched with opportunities to visit and appreciate this special place.

#6829

Name: N/A, N/A

Correspondence: I am writing to urge the National Park Service to discontinue the grazing of beef and dairy cattle at Point Reyes National Seashore. This precious area has been damaged by livestock grazing which poses a threat to the environment and local wildlife and it should be protected and used to serve the public good, and not for the benefit of the livestock industry.

I strongly oppose Option B and any other proposal that would be fatal to Tule Elk or other wildlife to the benefit of ranching operations, and encourage the agency to adopt Option F to discontinue grazing and allow members of the public to enjoy this beautiful park and to be enriched with opportunities to visit and appreciate this special place.

#6830

Name: Bergalis, Anna

Correspondence: Diabolical. Leave what little is left alone . Stop being soooooo greedy

#6831

Name: Bergalis, Anna

Correspondence: Diabolical. Leave what little is left alone . Stop being soooooo greedy

#6832

Name: N/A, N/A

Correspondence: I like the farms. Someday they will gp out if business. Some already have, and the land is reclaimed by the park.

If buildings as old as the ranches and farms were in a city, I believe they would be declared historical. Anyway, I know the land's history is older than the ranches and farms, but they are a good history lesson for now. Also, its ok to manage the elk, I think. But thats just me.

#6833

Name: N/A, N/A

Correspondence: Dear Park Service,

I support version "B" of the proposal. I believe that whenever possible Agricultural activities should be allowed to work hand in hand with the park system. I believe that farmers and ranchers are the original environmentalist because there very survival depends on the proper stewardship of the land. Particularly, in this case most of the farms are certified organic. Many of the recent fires that Northern California experienced could have been moderated if there had been an integrated grazing and harvesting plan. The reintroduction of the Elk has been problematic because they have no natural enemies and will reproduce without bound unless a discipline control system is adopted. It appears that the current control method is starvation. This is brutal and inhumane method of

control. It should not be the responsibility of the lease holders to protect their herds, their property, or themselves from the Elk. Please adopt proposal B and allow farms to coexist with the Park.

#6834

Name: N/A, N/A

Correspondence: The proposed decision to kill these rare elk on public lands to please a handful of private business owners (ranchers) who are using this resource for their own private enrichment already is gross mismanagement and grossly shortsided. No.

#6835

Name: N/A, N/A

Correspondence: I am writing to urge the National Park Service to discontinue the grazing of beef and dairy cattle at Point Reyes National Seashore. This precious area has been damaged by livestock grazing which poses a threat to the environment and local wildlife and it should be protected and used to serve the public good, and not for the benefit of the livestock industry.

I strongly oppose Option B and any other proposal that would be fatal to Tule Elk or other wildlife to the benefit of ranching operations, and encourage the agency to adopt Option F to discontinue grazing and allow members of the public to enjoy this beautiful park and to be enriched with opportunities to visit and appreciate this special place.

#6836

Name: Eachus, Samantha

Correspondence: I support Alternative F, phasing out cattle and dairy industry and returning the land to its natural state. The enabling legislation of the National Seashore supports wildlife protection and does not mention upholding private industry. The original leases to ranchers were to be 25 years. Ranchers have already been paid handsomely for their land, so it is long overdue to phase out the ranches. "Cultural Resource" and "Historic" does not mean industry needs to be currently in operation. Private business has no place on public land. Allowing industry and ranches to diversify their business is a bad idea. Already these ranches have been negatively impacting the land, mismanaged to allow soil erosion, scarring in the landscape, e.coli contamination in waterways and more. If you allow EVEN MORE agricultural practices on the seashore, there is no way to know the impact and there is no historical evidence you will be able to manage any negative impacts on the environment. Tule Elk should be protected for the survival of their species. They have already gone through a huge genetic bottle neck when they were almost completely wiped out except for 20 individuals. Every gene allele is important for the long term sustainability of the herd. The National Park should be protecting all Tule Elk, and allowing new herds to form and to TAKE DOWN THE FENCE at Pierce Point and allow all Tule Elk to roam free. I do not support granting 20 year leases to cattle and dairy industry. Climate science has indicated we have less than 12 years to mitigate the worst of climate catastrophe. Allowing business that has been linked to water pollution, species extinction and in Point Reyes is the culprit of over 60% of the greenhouse gas emissions, it is not a good idea to give that same industry a 20-year lease to continue degrading our national park. Point Reyes is a refuge to thousands of plants and animals. Point Reyes can be a leader in the fight for climate justice, and it starts with phasing out Beef and Dairy operations and restoring the land to its natural state. The EIS has NO MENTION of the effects of climate change in it, and does not include any information of the cattle and dairy's impact on climate change within the park.

#6837

Name: Strain, Judy

Correspondence: I love coming out to PT Reyes. I love the wildlife and nature. I want to keep the elk and the

historic ranches are not something I support keeping indefinitely. I think it is much more important to preserve the wild feeling of this National Seashore which belongs to all. Judy Strain

#6838

Name: Buckley , Linda

Correspondence: I am writing to urge the National Park Service to discontinue the grazing of beef and dairy cattle at Point Reyes National Seashore. This precious area has been damaged by livestock grazing which poses a threat to the environment and local wildlife and it should be protected and used to serve the public good, and not for the benefit of the livestock industry.

I strongly oppose Option B and any other proposal that would be fatal to Tule Elk or other wildlife to the benefit of ranching operations, and encourage the agency to adopt Option F to discontinue grazing and allow members of the public to enjoy this beautiful park and to be enriched with opportunities to visit.

#6839

Name: Snarr, Lee

Correspondence: The National Park Service MUST discontinue the grazing of beef and dairy cattle at Point Reyes National Seashore. This precious area has been damaged by livestock grazing which poses a threat to the environment and local wildlife: This should be protected and used to serve the public good - NOT for the benefit of the livestock industry.

I strongly oppose Option B and any other proposal that would be fatal to Tule Elk or other wildlife to the benefit of ranching operations, and encourage the agency to adopt Option F to discontinue grazing. Public parks are for people to enjoy and animals to thrive.

You are destroying this very planet with this continuous expansion of the livestock Industry. Many of us STOP supporting the exploitation of animals long ago - and this movement will continue to grow.

We see what's happening with the Amazon - profit & greed over common sense. STOP THIS CATERING TO THE LIVESTOCK INDUSTRY.

#6840

Name: Scott, Linnaea

Correspondence: I love to visit Pt Reyes with my family. It should be treated like the wild land it is, with no grazing by cattle. Keep CA wild everywhere possible, for the enjoyment t of humans and the protection of native plant and animal species!

#6841

Name: Culligan, Kieran

Correspondence: I live in Marin County, largely because of the incredible access to the outdoors. I am a frequent cyclists both as a commuter and recreational rider. I would like to ride more in the Point Reyes National Seashore, but the lack of loop routes makes it less than ideal.

I'm writing to support the public access and bicycling improvements outlined under Alternatives B, C, D, E, and F. I strongly support proposals that would lead to the planning and implementation of bicycling routes on trails, ranch roads, and pathways throughout the planning area, including but not limited to: 1) a connection between Devil's Gulch and Platform Bridge Road using existing ranch roads, 2) a connection between Bolinas Ridge Trail

at Olema Hill and Point Reyes Station to serve as an interim connection for the Cross Marin Trail, 3) a connection between Bolinas Ridge Trail and Five Brooks Stables using existing ranch roads 4) a connection between Drakes Estero and Abbotts Lagoon Trail using existing ranch roads, 5) a connection between Marshall Beach Trailhead and Pierce Point Road using existing ranch roads, and 6) an Estero Trail loop using existing ranch roads. I encourage NPS to collaborate with ranchers and other stakeholders to educate the public and address concerns related to public access on working ranch lands.

The improvements outlined above would enable and encourage me to visit the Seashore more regularly-and by bike, rather than car. I would feel much safer riding in the Seashore and surrounding areas on trails, pathways, and ranch roads, rather than on roads shared with fast-moving vehicular traffic. Bicycling opportunities are currently very limited and fragmented, so any improvements in connectivity and the creation of new loop options would enable me to enjoy more of the Seashore and surrounding areas by bike.

#6842

Name: hoex, christine

Correspondence: I support Alternative F, phasing out cattle and dairy industry and returning the land to its natural state. The enabling legislation of the National Seashore supports wildlife protection and does not mention upholding private industry. The original leases to ranchers were to be 25 years. Ranchers have already been paid handsomely for their land, so it is long overdue to phase out the ranches. "Cultural Resource" and "Historic" does not mean industry needs to be currently in operation. Private business has no place on public land. Allowing industry and ranches to diversify their business is a bad idea. Already these ranches have been negatively impacting the land, mismanaged to allow soil erosion, scarring in the landscape, e.coli contamination in waterways and more. If you allow EVEN MORE agricultural practices on the seashore, there is no way to know the impact and there is no historical evidence you will be able to manage any negative impacts on the environment. Tule Elk should be protected for the survival of their species. They have already gone through a huge genetic bottle neck when they were almost completely wiped out except for 20 individuals. Every gene allele is important for the long term sustainability of the herd. The National Park should be protecting all Tule Elk, and allowing new herds to form and to TAKE DOWN THE FENCE at Pierce Point and allow all Tule Elk to roam free. I do not support granting 20 year leases to cattle and dairy industry. Climate science has indicated we have less than 12 years to mitigate the worst of climate catastrophe. Allowing business that has been linked to water pollution, species extinction and in Point Reyes is the culprit of over 60% of the greenhouse gas emissions, it is not a good idea to give that same industry a 20-year lease to continue degrading our national park. Point Reyes is a refuge to thousands of plants and animals. Point Reyes can be a leader in the fight for climate justice, and it starts with phasing out Beef and Dairy operations and restoring the land to its natural state. The EIS has NO MENTION of the effects of climate change in it, and does not include any information of the cattle and dairy's impact on climate change within the park. Thank you for giving this comment your attention. Christine Hoex

#6843

Name: Grossi and Family, Richard

Correspondence: September 22, 2019

These comments are concerning the DEIS for the PRNS. To avoid repetition and save space by reference we also incorporate the comment letter submitted by the Point Reyes Seashore Ranchers Association and fully support and incorporate the letter submitted by PRNS and GGNRA Family Ranchers. There are a few additional sections that are important to point out. The first is succession. Our family purchased this ranch from Leonard David August 2, 1939. It was a working dairy at the time. The six generations that have and are currently living on this ranch have made a lot of improvements to the infrastructure, soil health, and water development to make this the historical and cultural resource that it is today. Our family fully intends to continue ranching in the future. Without a lease that insures our ability to care for this land a lot of historical value will be lost. Family values help make the land a beautiful cultural and historical resource. Allowing a lease takeover through an open request for capital proposals would destroy the agricultural heritage. In the case a leaseholder relinquishes his lease, the lease



should be offered, to current lessees within the seashore. The leases are intended for multi generational beef and dairy ranches to continue to operate in the seashore. When the 20 year leases to the existing ranching families have expired will they be able to renew the lease to continue ranching within the seashore for generations to come or will they be regulated out of existence? There must be a NEPA study done on the effects of non ranching within the seashore. Many of the details need to be corrected and further explained to the current leaseholders as identified in the DEIS. As currently written we will get a one year lease and the ROA will be reviewed every year before another lease will be issued. So we have a one year lease with a 20 year possessory tax bill.

This DEIS is incomplete in the mitigation measures that were compiled by intelligent people with multiple degrees but without any agricultural background or actual experience. Some of the measures in the ROA make no sense at all. The NPS must include the expertise of an advisory board compiled of UC extension, RCD, NRCS and MALT to fully analyze BMP's to make accurate recommendations. This draft DEIS was reviewed by NPS staff with no advice from the agricultural community. Pasture management is one of the most important aspects of beef ranching. Pasture improvement is a necessity for all aspects of agriculture.

Congress in 1962 through legislation designated PRNS to become an "Agricultural" seashore. In 2012 then Secretary of Interior, Ken Salazar, recommended NPS issue ranches 20 year leases. February 13, 2018 Congressman Jared Huffman introduced legislation (Bill HR 6687) to keep elk "separate" from the pastoral zone. The 1998 GMP stated that any elk that left the Limantour Wilderness area would be returned to the original herd in the wilderness. Superintendent Don Neubacher is on record stating "any elk that caused problems to ranchers would be promptly dealt with". The elk have definitely moved off the wilderness area and are in more than two separate groups in the pastoral zone. NPS has sufficient information submitted by the most affected ranchers on the ongoing damages to infrastructure, grazing habits, and adverse effects on the ranching operations. An article in the Capital Press newspaper dated June 13, 2019 page 1 written by Don Jenkins concerning elk damages and hazards relates to the concerns we are having within the agriculture lands. Perhaps NPS should contact some of the agencies involved to join forces in controlling elk and the damages they create. NPS calls for a "free roaming" herd. With daily interaction with park personnel and eating forage and hay intended for ranch animals these elk have become "domesticated" misleading the general public to believe that elk management is working - IT IS NOT! Immediate action must be taken to allow these ranches to survive. Two ranchers are on the brink of bankruptcy. Waiting for this DEIS to become an EIS will only allow time for more damages to occur. No where within the DEIS or ROA is there a complete elk management plan written. This must be rectified! All elk must be returned to the designated wilderness area immediately.

Diversification is completely taken out of context from the ranchers perspective. Its leads the public to believe there was never any animals except for the dairy and beef cows. In fact, there were crops such as artichokes, hay, and peas that were historically harvested on the ranches. Also there were free roaming pigs throughout the pastoral zones. When Domingo Grossi, Sr. purchased the M Ranch hay and artichokes were grown on this ranch and there were free roaming pigs. In the fall of the year the sows would bring their litter back to their home ranch. That years crop of pigs was either sold or processed for food. When food and hay became relatively easy to purchase and were able to be delivered because of increased road infrastructure, these crops were phased out. The misleading idea that 2.5 acres will help increase ranch income especially if a crop cannot be irrigated is insane!! Putting a crop near the core zone when the ground may not be suitable (due to rocks, hard ground, not crop compatible, etc.) is not a very good farming practice. So you are telling me that if a rancher currently has a garden not near their core zone, watering system already in place and slightly larger than the 2.5 acres that they have to abandon it and move the garden closer to the core? Dewey Livingston's book on historical ranches would show that there were, indeed, many types of diversification. The section on diversification in the DEIS is inaccurate and must be reevaluated, before the DEIS/EIS becomes final. The NPS acknowledges different types of livestock diversification and the need for guardian animals (llamas, donkeys, dogs) for livestock protection from predators. Because NPS lists guidelines from training manuals for livestock protection animals shows a complete lack of knowledge on this subject. Giving instructions to someone who is better qualified to train guardian animals seems completely wrong (mitigation measure page 399/ table 3-2 page 25). It makes no sense why anyone would think you are trying to "help" farmers/ranchers increase their income by allowing diversification. When we

increase our income, NPS is going to increase the rent. That is not helping with the problem of increased market fluctuations and sustainability. The point of diversification is to offset the rent cost.

Number 14 of the ROA states that there will be a "reserve account" for each ranch to cover maintenance cost. Does this imply it will cover the cost of both cyclic and capital improvement repairs? Where is the revenue coming from to fund these accounts? What is the total dollar amount to be held in this account? Who is going to hold this account? How is the money going to be disbursed? How complicated is the process for using these funds going to be? By the time the funds are disbursed the need for the repair will have escalated into a big problem! Who is going to decide what category the repair will fall into? Are the funds going to be separate for each ranch or are they going to be put into one big pot? This section is very vague and incomplete and must be more fully examined before this DEIS is complete. Forcing ranchers to fund an account that the NPS will have control over is not acceptable, because they cannot tell us what we have to spend OUR money on! The NPS is holding the ranchers to fair market values, but restricting fair market income by, using excessive regulations and restrictions, making it impossible to meet fair market value. This does not include the upkeep and repair costs of infrastructure. This section of the ROA must be removed because it makes no sense.

Number 15 of the ROA Ranch worker housing is completely out of NPS's jurisdiction. NPS does not pay the ranch workers wages or know the benefits of the ranch employees. Therefore NPS should not be involved in the rental rate for worker housing. This is only between the employer and employee. This section is completely irrelevant to this DEIS and should be removed from the ROA!

If the NPS understood the storage and feeding of silage they would know that plastic silage wraps are a one time use material. It is an inaccurate assumption that the plastic wrap is reusable.

In the ROA 4.17, NPS has the right to establish trails, roads, and other improvements through the ranch/farm premises for further use by visitors. Visitors will be authorized to walk or hike on various pastures and fields. In 13.3 of the ROA it says lessee must remove refuse, litter, trash, and miscellaneous debris. Who is responsible for removing human waste, refuse litter, and trash and miscellaneous debris? Especially in areas where there are no established trails? If visitors have the ability or right to access any of the premises such as hay barns (hay stacks) as well as fields with cattle in them, this is an accident waiting to happen. **THIS IS DANGEROUS!** They do not know proper safety protocol. People may enter the barns filled with flammable hay with cigarettes and start a fire. There are too many ways for visitors to injure themselves inadvertently. Our houses are off limits. I know that you wouldn't want people in your house without your permission. So why is it o.k. for them to go in ours? Visitors have wandered into seashore ranchers residences to look around.

In the ROA. 4.3 Livestock Species 4.3.2 this excerpt makes no sense. It is incomplete and totally incomprehensible.

In section 3.6 under authorized livestock you have to submit monthly stocking rate written report and any excess livestock numbers must be removed within 5 days. Some years there are as many as 20 sets of TWINS in beef herds - that would exceed the stocking rate. Does this mean excess baby calves must be sold to comply with stocking rates?

With all of these concerns you can see why we would be reluctant to agree to alternative B. We do not fully agree with any of the other alternatives either. Please read the letter submitted by the Point Reyes Seashore Ranchers Association and PRNS and GGNRA Family Ranchers for further information. Richard Grossi and Family

"There is no such thing as a post agricultural society. To deny the necessity of self sufficiency as a nation is to guarantee its collapse." By Timothy Weiskel

"Agriculture, manufactures, commerce and navigation, the four pillars of prosperity, are the most thriving when left most free to individual enterprise." By Thomas Jefferson

"Agriculture was the first occupation of man, and as it embraces the whole earth, it is the foundation of all other industries." By Edward W. Stewart

#6844

Name: Greenwood, Barbara

Correspondence: Please keep Point Reyes free from livestock grazing

#6845

Name: Finch, Shannon

Correspondence: I am writing to ask that the National Park Service continue to honor its mandate to protect, restore and preserve the natural environment at Point Reyes National Seashore. Taxpayers have spent a lot of money to restore the Tule elk to its natural habitat. Allowing ranchers, who are already heavily subsidized, to shoot elk is a waste of taxpayer money and flies in the face of the Park Service's mandate. No where is it stated that commercial enterprises should take priority on these public lands.

Thank you.

Shannon Finch

#6846

Name: Gerl, Carol

Correspondence: California's Point Reyes National Seashore was land designated for eventual removal of cattle and their grazing through attrition over a 25 year time period. Since then the Service has failed to enforce its agreement and now seeks continued and expanded alternative uses of the area for ranching and farming. Cattle ranching is not the purpose of a park. New plans to eradicate native wildlife such as the resident Tule elk is not part of a park enhancement or herd-management program but in support of non-park uses such as increased cattle growing, grazing, and farming.

If I recall correctly, the permits and licenses were non-transferable nor were they inheritable. Subsidy recipients were made aware of the 25 year limit on the Use.

Please enforce the original agreements in the creation of the Point Reyes National Seashore vision and Plan. It's the duty of the Park Services to protect and maintain the parks system.

#6847

Name: N/A, N/A

Correspondence: I am writing to urge the National Park Service to discontinue the grazing of beef and dairy cattle at Point Reyes National Seashore. This precious area has been damaged by livestock grazing which poses a threat to the environment and local wildlife and it should be protected and used to serve the public good, and not for the benefit of the livestock industry.

I strongly oppose Option B and any other proposal that would be fatal to Tule Elk or other wildlife to the benefit of ranching operations, and encourage the agency to adopt Option F to discontinue grazing and allow members of the public to enjoy this beautiful park and to be enriched with opportunities to visit and appreciate this special place.

#6848

Name: Thomas, Terri

Correspondence: Dear NPS planning staff,

I support a Merged Alternative, identified below, that has less environmental impacts than the Preferred Alternative for the Point Reyes (PORE) and North District of Golden Gate National Recreation Area (GOGA) General Management Plan Amendment Draft EIS (EIS). The Merged Alternative is justified based on the many continuing environmental impacts in the Preferred Alternative identified in the EIS, and the laws and policies of NPS articulated in this letter. A Merged Alternative with D, E and F will produce less impacts, provide for continues ranching, expand visitor opportunities and point the parks in a direction of leadership in reclaiming natural resources, preserving historic structures, continuing with cultural landscape ranching use and increasing visitor use and enjoyment.

My qualifications for commenting include a 34-year career in national park resources management including work at Everglades NP, Crater Lake NP, Yosemite NP and culminating as Chief of Natural Resources and Science at GGNRA and Director of Conservation, Stewardship and Research and the Presidio Trust. This experience gave me a national perspective, knowledge of and balance between local natural and cultural resources and experience with the economics and sensitivities of public/private partnerships and adaptive reuse of historic structures.

The goal of the Merged Alternative is to continue ranching with the least possible environmental impact. The Merged Alternative will: 1) Focus on Alternative D and will reduce grazing by the approximately 7500 acres identified, which retains the listing in the national register; 2) Apply Alternative E to the remaining acreage and convert the approximately 19,000 acres to beef cattle, which will decrease environmental impacts; 3) Apply Alternative F regarding public use and enjoyment and work toward the future condition identified as, "Visitors have opportunities to enjoy expanded connections and greater access to diverse recreation including, but not limited to, hiking and wildlife viewing". Keeping the approach with Alternative F would allow for increasing visitor use and decreasing grazing if ranchers decide not to use acreage in the future. 4) Continue one interpretive dairy ranch for public interpretation of the cultural history and landscape. This will continue one of the original families that worked PORE land. 5) Implement Recovery Plans for listed species whether requiring grazing for recovery or not. 6) Implement all mitigations noted for environmental impacts. 7) Research and monitor the land to reevaluate the condition after 15 years of the 20-year permit to evaluate the best next steps in land management of PORE and GOGA for the American people and future generations.

PREFERRED ALTERNATIVE CONCERNS: The reasons for not supporting the Preferred Alternative are based on 1) Neither the Point Reyes Act nor GGNRA Act established ranching as a purpose of PORE or GOGA, (16 U.S.C. § 459c.and Pub.L. 92-589, § 1, Oct. 27, 1972, 86 Stat. 1299); 2) NPS authorization of ranching is subject to the agency's overarching mandate to keep the scenery, natural and historic resources and wildlife unimpaired for the enjoyment of future generations. 54 U.S.C. § 100101(a) (formerly codified as part of the Organic Act at 16 U.S.C. § 1). The following explains these reasons:

A. The National Park Service Policies (2006), identify that the impairment of park resources and values may not be allowed by the Service unless directly and specifically provided for by legislation or by the proclamation establishing the park. The relevant legislation or proclamation must provide explicitly (not by implication or inference) for the activity, in terms that keep the Service from having the authority to manage the activity so as to avoid the impairment. The impacts identified for the Proposed Alternative in the draft EIS can be interpreted as impairment as identified in NPS Management Policies (2006) pages 10-12. Below are aspects identified in that definition of impairment and also sections of the PORE legislation. Adjacent to them is language from the EIS that can be interpreted as impairment, or inconsistent with legislation:

1. "...unacceptable impacts are impacts that individually or cumulatively" (NPS Policies (2006):

a. "Be inconsistent with a parks purposes or values" (NPS Policies 2006). The preferred alternative could be considered as inconsistent with the enabling legislations purpose to be "supportive of the maximum protection, restoration, and preservation of the natural environment within the area" (Pt. Reyes Act, 1978). This is based on

the continued impacts of the preferred alternative to water quality and soils (EIS page vi and vii), and the likelihood to adversely affect 9 endangered and 1 threatened species (Biological Assessments in EIS). In addition, the enabling legislation (1978) identifies the following item that relates to both the natural resources impacts and cultural landscapes: "Except for property which the Secretary specifically determines is needed for interpretive or resources management purposes of the seashore, the owner of improved property or of agricultural property on the date of its acquisition by the Secretary under sections 459c to 459c- 7 of this title may, as a condition of such acquisition, retain for himself and his or her heirs and assigns a right of use and occupancy for a definite term of not more than twenty-five years, or, in lieu thereof, for a term ending at the death of the owner or the death of his or her spouse, whichever is later." This means that the continuation of ranching indefinitely was not the goal of the legislation.

b. "Impede the attainment of a parks desired future conditions for natural and cultural resources as identified through the parks planning process" (NPS Policies,2006), The Preferred Alternative impedes several identified desired future conditions of park resources identified on page 2 of the EIS: 1) "Ecological function, connectivity, and processes persist and thrive in communities, including wetland, grassland, forest, scrub, and dunes. 2) Sources of air, water, noise, and light pollution are limited. 3) Habitats and populations of threatened and endangered species, special-status, and rare species persist and are improved 4). Native plant and animal communities persist and thrive. 5) Visitors have opportunities to enjoy expanded connections and greater access to diverse recreation including, but not limited to, hiking and wildlife viewing. This is based on the Biological Assessments and impacts identified in the EIS and appendices.

c. "Diminish opportunities for future generations to enjoy" (National Park Policies 2006). EIS page 48 identifies that there could be additional visitor facilities under alternative F that would not exist if ranching is continue, and therefore, opportunities for future generations to enjoy are diminished in the preferred alternative: destinations along Sir Francis Drake Boulevard from Pierce Point Road through the end of the planning area could be considered in the analysis. NPS would apply an adaptive management approach to evaluating visitor capacity levels once all ranching operations were discontinued and new visitor opportunities were established. Additional visitor capacity likely would be allowed under alternative F Therefore, not selecting Alternative F diminishes opportunities.

B. The Enabling Legislation (16 USC Sec. 459c) identifies the following overall intent, which does not include the continuation of ranching: 1) "In order to save and preserve, for purposes of public recreation, benefit, and inspiration, a portion of the diminishing seashore of the United States that remains undeveloped."

2) "Except as otherwise provided in sections 459c to 459c-7 of this title, the property acquired by the Secretary under such sections 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."

C. Section 1.4.3 of the NPS Policies (2006) identifies the key principles that the policies must include. Four of these are not met by the Preferred Alternative: 1). " Prevent impairment of park resources and values"; ( 2). "Ensure that conservation will be predominant when there is a conflict between the protection of resources and their use"; 3). "Employ a tone that leaves no room for misunderstanding the National Park Services commitment to the publics appropriate use and enjoyment, including education and interpretation of park resources, while preventing unacceptable impacts"; ( 4). "Pass on to future generations natural, cultural, and physical resources that meet desired conditions better than they do today, along with improved opportunities for enjoyment".

JUSTIFICATION FOR THE MERGED ALTERNATIVE The EIS and Appendices justify the Merged Alternative, as identified on page 1 of this letter, through specific statements in the EIS noting which alternatives cause the least possible impact and still allow for ranching on a 20-year lease. These include the following:

" The soil impacts will be less than the Preferred Alternative because the aspects of Alternative E reduce the impacts by the removal of dairy operations. Aspects adopted from alternative E will also eliminate adverse impacts on surface water and alternatives D, E, and F would have beneficial impacts on water quantity from the reduction or elimination of authorized livestock numbers.

" Under alternatives D, vegetation composition would likely change in areas where ranching is removed. In these areas, while the cessation of grazing would eliminate adverse impacts such as high-intensity-use areas, it may also result in an increase in invasive annual and perennial species. The 7500 acres removed from grazing. Please add that this 7500 acres will be monitored and adaptively managed to assess the impact of removing additional grazing in the future.

" Federally Listed Species will each have their own USFWS recovery plan and strategically identified grazing be prescribed if needed as a treatment.

" Under Alternatives D impacts on wildlife related to dairy and beef ranching on the 7500 acres would cease, including disturbance, trampling, erosion, and nutrient inputs.

" Aspects implemented from Alternative E will eliminate impacts of forage production, manure spreading, and diversification and would reduce high-intensity-use areas compared to existing conditions.

" Cessation of ranching on 7,500 acres, will have beneficial impacts on elk by removing existing fencing, reducing hazing, and providing additional grazing opportunities compared to existing conditions.

" Alternatives D and E would have some beneficial impacts related to experiencing natural sights and sounds by reducing ranching and closing dairy operations, respectively, and there could be additional recreational trail linkages and public opportunities through the adaptive reuse of ranch.

" Cultural Landscapes, Historic Districts, and Historic Structures would continue to contribute beneficial impacts through ongoing grazing and to the ranch structures that remained occupied.

" Adaptive reuse is proposed for as many historic structures as feasible.

" Air Quality will be improved with the part of alternative E that eliminates dairy cattle.

The 2019 Draft PORE Foundation Document articulates well the park purpose and values. The land dedicated to ranching appears to be 33% of the 86,000 combined acreage of {PORE and the GOGA land they administer}. Having 1/3 of the acreage for one use that creates such high environmental impacts does not seem justified considering legislation and policy insights. Since the enabling legislation for PORE and GOGA were enacted, the Marin Agricultural Land Trust (MALT) was formed. Since its founding in 1980, 56,000 acres of agricultural land is now preserved forever. This wonderful achievement also allows the National Park Service to accomplish identified purpose in the legislation for PORE and GOGA with minimal environmental degradation.

Thank you for your consideration of this Merged Alternative,

Terri Thomas

#6849

Name: Galt, Cindy

Correspondence: No more cattle or other farming at Pt Reyes National Seashore. Take a lesson from Patagonia National Park (see CBS Sun. Tomkins bought first 175 acres including cattle ranches. Then expanded their purchases. They recently donated the land to Chili as a National Park! No cattle ranches! Only animals natural to Pt Reyes! Chili is "Rewilding" with animals natural to the environment! Cattle do not belong in Pt Reyes! They are

nit natural to the area. Pt Reyes needs "rewilding" for preservation of the natural environment and enjoyment of all. Not for the personal business profit of ranching families from another time, Not today! Thank you , please return Pt Reyes to it's natural beauty.

#6850

Name: Swan, Angela

Correspondence: Hi, please protect the elk at Port Reyes National Seashore in California by making the land they use a conservation park thank you Angela Swan

#6851

Name: Juricek, Kay

Correspondence: I ask that the ranchers simply be removed from the National Seashore. That they are there to this day is simply wrong and a drain on our shrinking national parks budget. No hunting of elk, no special sweetheart arrangements for ranchers. Since the Bundy debacle I've had it with ranchers and their discount deals on our threatened and endangered public lands. No more!

#6852

Name: N/A, Heather

Correspondence: Please ensure the rights of Tule elk herds in Point Reyes nature preserve. Cattle are an invasive species and they do not deserve more rights than nature. Allowing cattle ranchers to kill elk is abhorrent and cruel. When those creatures run out of elk to kill they will turn their bloodlust on pets and people. Those Tule elk are the pets of the people.

#6853

Name: N/A, N/A

Correspondence: The plan to eliminate the Tule elk is ridiculous. Here are just some of the reasons this is a terrible Proposal:

Discuss how wildlife and natural scenery motivate you to visit Point Reyes and other national parks. Point Reyes National Seashore is supposed to be managed under the Point Reyes Act for "maximum protection, restoration, and preservation of the natural environment." There's no mandate for prioritizing commercial agricultural leases on these public lands. Natural values, native wildlife, public access and enjoyment should take priority over commercial activities at Point Reyes. Tule elk are an important part of the landscape at Point Reyes. Their recovery is a result of successful native ecosystem restoration, which is a key element of the Park Service's mission. It's taken a lot of time, money and effort to restore tule elk to Point Reyes, the only national park where they live. Tule elk should be allowed to roam free and forage in the park - not shot, removed, fenced or treated as problem animals. Right now the Point Reyes ranches enjoy not only subsidized grazing fees and housing, but also taxpayer-funded infrastructure and road improvements, and publicly funded projects. But commercial activities at Point Reyes should be required to accommodate native wildlife - not the other way around. The Park Service shouldn't allow any new agricultural activities at Point Reyes. Planting artichokes or other row crops will attract birds. And introducing sheep, goats, pigs or chickens will attract native predators such as coyotes, bobcats and foxes. Expanded ranching would only create new wildlife conflicts. Cattle ranching should only be allowed if it's consistent with preserving the natural environment. And agricultural activities such as mowing shouldn't be allowed in park areas where they harm endangered species or wildlife habitat, impair water quality, cause excessive erosion or spread invasive plants/diseases. Cattle are the seashore's primary source of greenhouse gases. So the Park Service's preferred alternative is inconsistent with its own "Climate Friendly Parks" plan.

Thank you very much, John Oda

#6854

Name: Parker , Sasha

Correspondence: As a California resident I urge you to end livestock grazing at Point Reyes National Park and to allow this precious land to remain as wildlife habitat and to be used for the public good, not for the benefit of the livestock industry.

#6855

Name: Sun, Alasdair

Correspondence: I am a native San Franciscan and lifelong cyclist. While I admit that I don't make it out to Pt. Reyes as often as I'd like, when I have, I haven't been clear on where I can go with my bike. Pt Reyes and west Marin is such a beautiful area and I'd love to be able to ride safely and legally on trails out there!

I'm writing to support the public access and bicycling improvements outlined under Alternatives B, C, D, E, and F. I strongly support proposals that would lead to the planning and implementation of bicycling routes on trails, ranch roads, and pathways throughout the planning area, including but not limited to: 1) a connection between Devil's Gulch and Platform Bridge Road using existing ranch roads, 2) a connection between Bolinas Ridge Trail at Olema Hill and Point Reyes Station to serve as an interim connection for the Cross Marin Trail, 3) a connection between Bolinas Ridge Trail and Five Brooks Stables using existing ranch roads 4) a connection between Drakes Estero and Abbotts Lagoon Trail using existing ranch roads, 5) a connection between Marshall Beach Trailhead and Pierce Point Road using existing ranch roads, and 6) an Estero Trail loop using existing ranch roads. I encourage NPS to collaborate with ranchers and other stakeholders to educate the public and address concerns related to public access on working ranch lands.

The improvements outlined above would enable and encourage me to visit the Seashore more regularly-and by bike, rather than car. I would feel much safer riding in the Seashore and surrounding areas on trails, pathways, and ranch roads, rather than on roads shared with fast-moving vehicular traffic. Bicycling opportunities are currently very limited and fragmented, so any improvements in connectivity and the creation of new loop options would enable me to enjoy more of the Seashore and surrounding areas by bike.

Thank you

#6856

Name: N/A, N/A

Correspondence: When will NPS understand the fact that it is the wildlife and protections of the parks that keep visitors going to the protected locations.

Point Reyes National Seashore is supposed to be managed under the Point Reyes Act for "maximum protection, restoration, and preservation of the natural environment" and Tule elk are an important part of the landscape. Their recovery is a result of successful native ecosystem restoration, which is a key element of the Park Service's mission. It's taken a lot of time, money and effort to restore tule elk to Point Reyes, the only national park where they live. Tule elk should be allowed to roam free and forage in the park - not shot, removed, fenced or treated as problem animals.

Right now the Point Reyes ranches enjoy not only subsidized grazing fees and housing, but also taxpayer-funded infrastructure and road improvements, and publicly funded projects. But commercial activities at Point Reyes should be required to accommodate native wildlife - not the other way around.

The Park Service shouldn't allow any new agricultural activities at Point Reyes. Expanded ranching would only create new wildlife conflicts.



Cattle ranching shouldn't be allowed in parks because they harm endangered species and wildlife habitat, impair water quality. Cattle ranchers have no concern for the environment or wildlife - only greed.

#6857

Name: N/A, Gail

Correspondence: I am writing to urge the National Park Service to discontinue the grazing of beef and dairy cattle at Point Reyes National Seashore. This precious area has been damaged by livestock grazing which poses a threat to the environment and local wildlife and it should be protected and used to serve the public good, and not for the benefit of the livestock industry.

I completely oppose Option B and any other proposal that would be fatal to Tule Elk or other wildlife to the benefit of ranching operations, and encourage the agency to adopt Option F to discontinue grazing and allow members of the public to enjoy this beautiful park and to be enriched with opportunities to visit and appreciate this special place.

#6858

Name: N/A, N/A

Correspondence: I do not support granting 20 year leases to cattle and dairy industry. Climate science has indicated we have less than 12 years to mitigate the worst of climate catastrophe. Allowing business that has been linked to water pollution, species extinction and in Point Reyes is the culprit of over 60% of the greenhouse gas emissions, it is not a good idea to give that same industry a 20-year lease to continue degrading our national park. Point Reyes is a refuge to thousands of plants and animals. Point Reyes can be a leader in the fight for climate justice, and it starts with phasing out Beef and Dairy operations and restoring the land to its natural state. The EIS has NO MENTION of the effects of climate change in it, and does not include any information of the cattle and dairy's impact on climate change within the park.

#6859

Name: Austring, Dee

Correspondence: • Point Reyes National Seashore is supposed to be managed under the Point Reyes Act for "maximum protection, restoration, and preservation of the natural environment." There's no mandate for prioritizing commercial agricultural leases on these public lands.

- Natural values, native wildlife, public access and enjoyment should take priority over commercial activities at Point Reyes.
- Tule elk are an important part of the landscape at Point Reyes. Their recovery is a result of successful native ecosystem restoration, which is a key element of the Park Service's mission. It's taken a lot of time, money and effort to restore tule elk to Point Reyes, the only national park where they live. Tule elk should be allowed to roam free and forage in the park - not shot, removed, fenced or treated as problem animals.
- Right now the Point Reyes ranches enjoy not only subsidized grazing fees and housing, but also taxpayer-funded infrastructure and road improvements, and publicly funded projects. Commercial activities at Point Reyes should be required to accommodate native wildlife - not the other way around.
- The Park Service shouldn't allow any new agricultural activities at Point Reyes. Planting artichokes or other row crops will attract birds. And introducing sheep, goats, pigs or chickens will attract native predators such as coyotes, bobcats and foxes. Expanded ranching would only create new wildlife conflicts.

- Cattle ranching should only be allowed if it's consistent with preserving the natural environment. And agricultural activities such as mowing shouldn't be allowed in park areas where they harm endangered species or wildlife habitat, impair water quality, cause excessive erosion or spread invasive plants/diseases.
- Cattle are the seashore's primary source of greenhouse gases. So the Park Service's preferred alternative is inconsistent with its own "Climate Friendly Parks" plan.

#6860

Name: Lucas, Catherine

Correspondence:

I appreciate the opportunity to comment on the Draft Point Reyes General Management Plan Amendment (DGMPA). The PRNS and GGNRA are vitally important resources, both for their beauty and recreational opportunities and as examples of best practice for conservation and park management. Therefore I am deeply troubled by the DGMPA preferred Alternative B, because it emphasizes commercial interests over protecting other values such as water, air and soil quality, wildlife (especially elk), vegetation, traditional recreation activities and visitor experience.

The DEIS shows that Alternative B will have detrimental environmental consequences on all natural resources within the park, in spite of the fact that there are three NPS laws which prohibit actions that will impair natural resources: the 1916 NPS Organic Act; Point Reyes National Seashore legislation Section 459c-6, and Golden Gate National Recreation Area legislation Section 460bb.

The Preferred Alternative also inaccurately executes out the directive from the former Secretary of the Interior to extend leases for cattle and dairy ranches "consistent with the applicable laws and planning processes". It also ignores the direction of former NPS director Jonathan Jarvis to extend leases for the purpose of "grazing cattle and operating beef and dairy ranches..." In neither directive was there the intent to expand the agricultural footprint in the Park, as is the case with Alternative B.

Thus the preferred Alternative B fails to address or conform to the overall intent of the NPS and the park enabling legislation for PRNS, as well as current NPS Policy. Nor is there any evidence that the PRNS has the funding/capacity to administer the oversight program developed in Alternative B.

In addition there are specific areas of concern pertaining to Alternative B: Impact of Diversification:

Predation on ranch animals (goats, sheep, chickens) will inevitably lead to conflicts with wildlife. Damage to the scenic and historic values of the Seashore as the ranch cores and historic pastures will be changed to support new uses. The application of adaptive reuse plans within the historic district to buildings, structures, objects, and landscapes (outside of priorities for interpretation, visitor use, or administrative use) is likely inconsistent with NPS management guidance for historic preservation.

Succession Impacts:

The open Request for Proposals changes the context and values of the Ranchland zone being limited to multi-generational beef and dairy operations, and these impacts are not sufficiently addressed. Under the original rule, ranching in the park may well have reached a natural expiration point as ranchers retired and subsequent generations waived their right to renew the lease. (Many would argue this was the intent of the enabling legislation.) The open Request for Proposals all but guarantees indefinite ranching in the park, subjecting PRNS to greater and greater commercial pressure. Failure to analyze the interest of outside commercial operations in facilitating ongoing ranching activities and/or subletting activities that could occur with the proposed diversified uses.

#### Increased Visitor Use in Drakes Estero:

Environmental impacts such as human waste, garbage, and potential for destruction of park and cultural resources have not been fully examined as part of the draft EIS. In light of NPS requirements to close down boat-in camps in other areas of the Seashore due to these problems new boat in sites near sensitive Marine Wilderness should not be considered.

#### Funding Considerations:

The Draft EIS is missing a budget or financial overview that outlines how any of the alternatives and actions will be implemented and paid for. Without this information made available to the public there may be negative impacts to natural resources management, visitor services, and other vital existing park programs to protect the environment that have been overlooked.

#### Tule Elk:

Lethal management of wildlife to benefit the commercial interests of a lessee are prioritized over adaptive management strategies.

In summary, Alternative B is incompatible with the Park Service's duties under three statutes and raises multiple other areas of concern. Instead of proceeding with a Final EIS, the park should prepare a supplemental DEIS for a ranching alternative that complies with applicable laws requiring the protection of natural resources and release that supplemental DEIS for public comment.

Sincerely, Catherine Lucas

#6861

Name: N/A, N/A

Correspondence: For years Point Reyes and the surrounding area have managed to keep their natural beauty and rural charm that has been stripped of most of the Bay Area. The NPS preferred option would open up the area to commercial exploitation, not immediately but slowly in the long run. Option F is ideal; it preserves the natural aspect of the park to the fullest extent possible and also generates revenue due to it being easier for tourists to access and enjoy.

#6862

Name: Tilden, Shelby

Correspondence: Killing wild animals so that animals who have been bred to be killed can destroy park land? Surely you're joking, right? Please protect the elk.

I am writing to urge the National Park Service to discontinue the grazing of beef and dairy cattle at Point Reyes National Seashore. This precious area has been damaged by livestock grazing which poses a threat to the environment and local wildlife and it should be protected and used to serve the public good, and not for the benefit of the livestock industry.

I strongly oppose Option B and any other proposal that would be fatal to Tule Elk or other wildlife to the benefit of ranching operations, and encourage the agency to adopt Option F to discontinue grazing and allow members of the public to enjoy this beautiful park and to be enriched with opportunities to visit and appreciate this special place.

#6863

Name: N/A, N/A

Correspondence: We need to take back our environment from meat eaters!

Please keep the park as a place for the natural flora and fauna rather than for commercial exploitation. Climate crisis! It's here, it's real, vote for our earth's health if you value your lives and your kids' lives.

#6864

Name: Kwock, M

Correspondence: Please withhold my personal information from public review.

I support Option F to remove ranching from the Pt. Reyes National Seashore to allow the land to revert by natural processes and to allow the tule elk unrestricted access to open lands within the park area. Overall ranching is just not compatible with a national park, no matter that someone had cows there 150 yrs. ago. If cattle made the seashore into its current state then let it evolve to what it should have been.

I strongly object to the current management practice of killing tule elk in favor of cows, as included in Options B-D, which allow only a token herd of elk that can never expand, in what used to be their natural range.

What we have now is a commercial dairy operation using public land.

#6865

Name: Buxton, Eva

Correspondence: Tiburon, Sept. 22, 2019

To: Superintendent Point Reyes National Seashore & Golden Gate National Recreation Area 1 Bear Valley Road, Point Reyes Station, CA 94956

Re: Draft Environmental Impact Statement (DEIS) for the Amendment of the General Management Plan (GMP) at Point Reyes National Seashore (PRNS; Seashore) and the Northern District of the Golden Gate National Recreation Area (GGNRA).

Thank you for the opportunity to comment on the Draft Environmental Impact Statement (DEIS) for the Amendment of the General Management Plan (GMP) at Point Reyes National Seashore (PRNS; Seashore) and the Northern District of the Golden Gate National Recreation Area (GGNRA). The document considers six alternatives (A-F), five of which propose continued ranching. Alternative F proposes phasing out ranching over five years. Alternative B is the preferred alternative of the National Park Service (NPS).

As a botanist, my comments are limited to those pertaining to vegetation. I find the document comprehensive and well researched; however, it is inadequate in the description/analysis in several areas, the most notable the lack of mapping of the location of sensitive resources, including native plant communities and special-status species. It is challenging to comment on the adequacy of an EIS, when the sensitive environmental resources to be protected are not mapped.

#### Mapping

The map labeled Vegetation in the Planning Area (App. A, Fig. 44) does not show enough detail to differentiate between grassland/pasture and sensitive plant communities - coastal scrub, coastal prairie, coastal dune scrub, and serpentine grassland. There are no maps of special-status species occurrences. Appendix J mentions the location of federally listed species on the various ranches and other areas, but as the DEIS is both a programmatic and site-specific document (p. ii), detailed maps at a legible scale of the distribution of all sensitive resources (not only federally listed species) on each ranch zoning map needs to be presented in the Final EIS. The DEIS states (3.2.1)

that the maps will continue to be refined in collaboration with the ranchers, but there is no mention of when such maps will be finished.

### Subzones

Four subzones on each ranch will be created to be used for different purposes. I support the creation of a Resource Protection subzone, where no grazing will be authorized, except for more closely monitored prescribed grazing, which could potentially enhance habitats and native plant populations. (It is noticeable that the resource protection subzones are very limited in areal extent on most ranches.) These newly created subzones are marked on the ranch zoning maps. It is, however, unclear how the zones are delimited and bounded on each ranch.

The DEIS states that grazing can occur in the Range subzone, but more intense activities are not allowed, because there is documented presence of sensitive resources, including rare plants, wetlands, etc. These resources need to be mapped and an explanation made why such resources do not fall within a Resource Protection subzone. Fig. 41 illustrates where erosion hazards are present. Due to the lack of mapped locations of sensitive resources, it is not clear, if some of the Resource Protection subzones are mapped as such, because the zones exceed a 20% gradient, or if there are actual sensitive resources present.

Activities such as mowing, seeding, nutrient management (dairies), animal diversification, and forage production can be allowed in the Pasture subzone adjacent to the Range subzone. All these activities constitute impacts on more natural (not necessarily native) grasslands. It is unclear, if each subzone will be defined by fencing. It is essential that fencing of sensitive habitats occurs and - whether temporary, movable or permanent - the fences are constructed in such a way that the cattle (or elk) cannot breach them, as apparently happened, enabling cattle to trample beach layia (*Layia carnosa*) and Tidestroms lupine (*Lupinus tidestromii*), both federally listed as endangered, in coastal dune areas (pp. 131, 137).

### Grazing

The grazing pressure by the prehistoric megafauna (ex. mastodon, mammoth) and presently occurring grazers (ex. elk, deer) (Grazing Handbook) is minimal compared to the intense pressure exerted by thousands of beef and dairy cattle within fenced areas such as is the case at PRNS and GGNRA today.

Grazing as a management tool is extremely complex. It can be argued that grazing an area that has been grazed for over a century, thus supporting mostly non-native species, is an essential ecological process that should be preserved. However, the benefits to native plants depend on the type of plants present: annual vs. perennial; palatable to cattle or not; how many AUs are left for how long in a particular location; what time of the year grazing occurs; when grazing occurs in relation to flowering and seedset of the plants, etc. It is not clear who will do the time-sensitive monitoring - the NPS or the ranchers. The DEIS states (3.2.5): Annually, NPS and ranchers would review performance measures, including RDM, to identify grazing levels that would ensure site conditions are maintained to meet the minimum RDM standard. A predetermined RDM height or pounds of animals per acre at the end of the grazing season (p. 21) are highly unlikely to protect native flowering or fruiting plants. Monitoring grazing to enhance habitat or protect (save!) special-status species needs to be done, for the latter, preferably on a daily basis. A cow can devour a population of rare plants in a day [as was done to Brewers milkvetch (*Astragalus breweri*) in a vernal pool in Solano County (pers. obs.)].

### Rare Plants/Sensitive Plant Communities

As NEPA requires mitigation for federally listed species only (Table J-2), two State-listed species, Pt. Reyes blennosperma (*Blennosperma nanum* ssp. *robustum*) and Pt. Reyes meadowfoam (*Limnanthes douglasii* ssp. *sulphurea*) as well as approximately 27 Rank 1B species (rare and endangered throughout their ranges) (Table J-1) (California Native Plant Society's California Rare Plant Rank (CRPR) list) receive no protection. I am aware that surveys have been done over many years for all these species, including GIS mapping (NPS 2019, App. B, Refs.)

and that results are available. It is, therefore, difficult to comprehend why they are not mapped to make the DEIS informative with respect to the location, thus potential preservation of sensitive plant resources.

Appendix K discusses the possibility of excluding cattle from coastal dunes, which support beach layia and Tidestroms lupine; coastal prairie, which supports Sonoma spineflower (*Chorizanthe valida*); freshwater marshes with moist soils, which support Sonoma alopecurus (*Alopecurus aequalis* var. *sonomensis*); and serpentine grassland on GGNRA land, which supports Marin dwarf flax (*Hesperolinon congestum*) and Tiburon paintbrush (*Castilleja affinis* ssp. *neglecta*). Will cattle be excluded from these communities? The DEIS (p. 45) states that Most occurrences of Tidestroms lupine are in areas largely excluded from cattle grazing. This statement is vague and begs the question: Why is a federally listed endangered species not completely excluded? Because of unceasing impacts on native plants for over a century, areas where these species are known to occur, as well as the above-mentioned State-listed and Rank 1B plants should be protected and managed, even if it is at the expense of commercial interests.

Areas at Bull Point (abandoned F ranch) supporting some of the Rank 1B species, for ex., swamp harebell (*Campanula californica*), coast lily (*Lilium maritimum*), and Pt. Reyes checkerbloom (*Sidalcea calycosa* ssp. *rhizomata* (pers. obs.) should be protected and managed. Furthermore, in a national park like the Seashore that has been impacted by grazing for many decades - resulting in few native species with little absolute cover - grassland areas, especially moist areas, supporting relatively common plants, including camas lily (*Camassia quamash*), marsh rein-orchid (*Platanthera dilatata* var. *leucostachys*), cow clover (*Trifolium wormskioldii*), and yellow-eyed grass (*Sisyrinchium californicum*) should be protected (pers. obs. on the G Ranch). It is not possible to determine if this particular (moist) area is what is shown as a Resource Protection subzone (dark green) on Fig. 14, and how, and if, it would be shielded from impacts from year-round grazing.

It is well-known that some special-status species experience more adverse effects from grazing than others. It was determined by USFWS (2002; DEIS p. 129) that ranching in the park is not likely to jeopardize the growth of several rare plants in the Seashore. The expression not likely is likely used, because there are many science-based reports with varying views, and survival or no survival of plants depends on the species. Grazing in habitats supporting Marin dwarf flax (FT/CT) is supported by the NPS, because it would prevent the build-up of thatch and added nitrogen, which promotes the growth of non-native grasses. As I have worked extensively with that species on the Tiburon peninsula, I suggest that cattle grazing - especially cattle-trampling in a fragile habitat with erodible serpentine soils - is extremely detrimental to the survival of a delicate, annual plant like the dwarf flax. Depending on the size of the populations in the planning area (GGNRA), hand-weeding or other manual/mechanical labor should be an option. There is no reference to such methods in the DEIS. The NPS did not list trampling as a threat to the dwarf flax in 2019 (p. 129). There is no literature on grazing impacts on Tiburon, a perennial plant, in the same habitat. [The number of paintbrush individuals has diminished in the last decade on the Tiburon peninsula (pers. obs.)]. The USFWS (2002) suggests that grazing is not detrimental to beach layia, yet the layia declined by 84% in abundance from 2004 to 2018 (NPS 2019; p. 129) in areas where grazing took place. Conversely, Sonoma spineflower appears to survive and thrive in grazed areas, as does sand spineflower (*C. cuspidata* var. *villosa*) (Rank1B) in the Bull Point area.

### Filter Strips

Filter strips consisting of vegetation will be used between environmentally sensitive areas and high-use agricultural lands. It is suggested that the plants will remove sediments and pollutants from runoff and wastewater (p. D-9). There is no mention of what species will perform these functions or how wide the strips need to be to function properly. It would seem that high-use agricultural lands, including dairies and pig farms with manure waste, should not be located next to environmentally sensitive areas! Have filter strips been used in the past in the Seashore and, if so, how did they perform? A list of potential species to be used needs to be provided in the Final EIS).

### Alternative B

The NPS expresses support for Alternative B, which provides for the continuation of ranching and dairying at PRNS. The Parks legislative history clearly shows that although the ranches are cultural and historic resources, preserving them must further not weaken the Seashores overall purpose of protecting and enhancing its natural resources. Instead of reducing or lessening the impacts on natural resources, Alternative B enables increases in the disturbance to natural resources and processes by allowing:

agricultural row-crops

diversification to small animals such as pigs\*, sheep, goats, chickens

increased horse boarding

new facilities for ex. for cheese-making

new dwellings for family members

increase in grassland acreage by mowing and grazing to prevent coyote brush and other shrubs from invading grasslands

forage production - silage, haylage and hay

extension of ranch leases from five to twenty years, et al..

\*It is especially disconcerting that pig farming will be authorized. Pig farms, like dairies, cause severe environmental impacts as a result of manure, which affects surface and groundwater quality as well as air quality, and removal of vegetative cover. It is also worth considering that escaped domestic pigs, reproducing quickly, can become feral in one generation. Feral pigs damage vegetation and may become aggressive.

Mitigation measures (App. D) in an already disturbed landscape become similar to, or are those of Best Management Practices (BMPs). Some impacts cannot be mitigated.

#### Alternative E

I support Alternative E, which would eliminate some of the ongoing damage to native and non-native vegetation by removing the six dairies on PRNS land, eliminate seeding, forage production and diversification. Dairy-cow herds, which are larger than those of beef-cattle, do great damage to vegetation by congregating around barns and feeding areas. This results in the removal of vegetation, accumulation of manure, erosion and polluted run-off. Spraying and spreading of manure on pastureland would cease under this alternative. Manure as a fertilizer changes plant species composition in favor of non-native grasses - an obvious desired effect for ranchers but a negative effect for native vegetation.

Alternative E would allow grazing by beef cattle only, which, if managed correctly, may be beneficial - in many cases essential - to preserving and/or restoring native vegetation, including special-status species, while reducing invasive species in areas already damaged by decades of grazing and other disturbances. It will also reduce air and water pollution. This alternative would be more in line with the primary purpose of national parks, i.e., to conserve the scenery and the natural and historic objects and the wildlife therein and to provide for the enjoyment of the same in such a manner and by such means as will leave them unimpaired for the enjoyment of future generations (Organic Act 1916). As the environment is already impaired from a century or more of grazing, it should be NPSs mission to preserve and restore as much as possible of what is left of natural resources.

#### Concluding Remarks

I urge the NPS to reconsider its preference for Alternative B. As the DEIS (p. vi) states, Under Alternative E, noticeable beneficial impacts would occur compared to existing conditions from the conversion of six dairy ranches to beef operations, elimination of manure management practices, seeding, forage production and diversification activities, Alternative E ought to be the preferred alternative of the NPS.

Maps of sensitive plant resources need to be provided in the Final EIS, as well as descriptions of how these resources will be managed on each ranch. The resource management practices should be incorporated in the Ranch Operating Agreements (ROA), required between the NPS and each rancher.

Eva Buxton

Botanist Retired environmental consultant Conservation & Invasive Species Chair, CNPS Marin Chapter

Hardcopy showing italics and boldfaced text to be delivered to Point Reyes Station, Sept. 23, 2019

#6866

Name: Lenhart, Phoebe

Correspondence: To whom it may concern:

This E-mail is sent to your attention regarding the Point Reyes National Seashore and the tule elk who live there.

As a CA resident and USA taxpayer, I love our national and state parks. I object to the Point Reyes National Seashore being used by cattlemen and ranchers in order to feed their cattle.

Point Reyes National Seashore is just that, a NATIONAL PARK! It is NOT private graze land for cattlemen and ranchers. I want to see the Point Reyes National Seashore restored to the tule elk, other wildlife, and indigenous plants promptly. The Point Reyes National Seashore has been abused too long. It is past due to terminate the relationship that exists between the NPS and the cattlement and ranchers.

The publics' and the environments' best interest are NOT being served when you appease to the cattlemen and ranchers. I urge that the Point Reyes National Seashore be returned to its previous state of wildlife and plants. As the NPS, that is your true obligation.

#6867

Name: Jones, Patricia

Correspondence: Hello: Pt. Reyes is one of our natural wonders and is the only federally designated wilderness area in the SF Bay area. We should protect it in its natural state.

• The EIS makes it clear that under all the alternatives for continued cattle ranching, there will be detrimental environmental consequences on the Park's natural resources, including soils, water quality, vegetation, and wildlife (including tule elk). • The National Park Service governing laws prohibit actions that will impair natural resources.

Consequently, the Park Service should not adopt any ranching alternative and should prepare a supplemental DEIS with ranching alternatives that comply with applicable laws prohibiting the impairment of natural resources.

thank you

#6868



Name: Donahue, Mary

Correspondence: Growing up in West Marin has greatly influenced my relationship with the natural world.

My husband and I love hiking and observing the amazing animals and beautiful plants that grow in the park. It is a place of great beauty and should be preserved.

Reading the different options to best preserve the Natural beauty of Point Reyes and the Historic Ranch Lands I feel strongly that diversifying the farm animals and allowing for the short term rentals of historic buildings will only lead to destructive commercialism of the Seashore. This is National Park Land and is not meant to be exploited by a few but to be appreciated by many. Introducing more farm animals to the park will only make delicate ecosystems more complex and difficult to manage. Bobcats, coyote, and mountain lions will go after chickens, sheep and goats. How will the introduction of these domestic animals affect the current population of rodents and rabbits?

My favorite trail in Point Reyes is the Estero Trail. A beautiful trail going through a variety of different habitats. I love seeing the downy woodpecker's, great horned owls, bewick's wrens, tiger sharks, snowy plovers, coyotes and the many other wild animals that live there. Two years ago my husband and I were walking out to Sunset Beach, when we arrived we saw 12 cows standing in the mudflats on the shore. I cannot imagine this is good for the habitat of the park or what the founders of the park intended. .

Planting crops for commercial use will create more fencing and less access to the wildlife and less access for the people that want to enjoy the beauty of Point Reyes. National Parks were created to give people access to the outdoors, this plan only limits access.

This is first and foremost a National Park and is owned and paid for by United States citizens and its future should not be dictated by a small group of people. My opinion is that all the ranch lands should be phased out and should be returned to their natural habitat. At the very least I think the park should only lease to historic ranch families and should not allow diversifying of farm animals, crops, or rental of any historic buildings.

Thanks, Molly Donahue

#6869

Name: Pellowski, Noelle

Correspondence: Please save the Tule elk of Point Reyes National Seashore from being culled. Culling fifteen per year is fifteen too many. Their genetic biodiversity is small because it appears all 40,000 alive are from one breeding pair. That means a single disease could wipe out all of them. We need every Tule elk alive, well, and living on healthy land. National Parks and public lands are to be protected for the future generations, not agribusinessed to decline and ultimate death. Do your job, protect the park and the genetic diversity within.

#6870

Name: Petersen, Tyler

Correspondence: Hello, my name is Tyler Petersen a Watershed Science student at College of Marin. I am writing today on behalf of the preservation of my favorite national park, Pt. Reyes Seashore. I stand against the parks proposal to expand agricultural practices. My education only puts me an amateur in the natural spaces, so I admire that the national park service is trained professionals who understand preserving biological diversity benefits society and nature both. Not only do I believe in biodiversity I appreciate the evolution and I value the results of it. Earth and the organisms that inhabit it have evolved for million's of years to efficiently recycle its limited chemicals. Each organism that constitutes the trophic levels of the environment are crucial to maintaining the cycling of chemicals, however, agricultural does the exact opposite; It accumulates nutrients and overloads natural systems leading to eutrophic waters and unfertile soils from the agricultural runoff. Not only are abiotic features being disrupted, but also the biotic factors are at risk. Cows and other agricultural inputs introduce an

abundance of non-native species to the park's biodiversity, which the environment of Pt. Reyes has not evolved to properly manage. The Elk and wildlife that the public enjoys are removed and barred from Pt. Reyes to produce meat and dairy for the economy. Expanding farming practices will only increase the number of organisms being eliminated. I am not opposed to farming and agricultural practices, or the success of businesses that California's economy is based on. Though there are a time and a place for ranching and inside a national park is no place for ranching to be done. Thank you for your time.

-Tyler Petersen

#6871

Name: Curtice, Linda

Correspondence: Please do not infringe on the native animals just to feed the farmed cows. I will gladly eat less cow meat so that farming does not destroy our natural lands.

Public Lands should not be used and destroyed for the profits of a company. This is wrong. Thank you for listening to my thoughts.

Linda

#6872

Name: Duhan, Deirdre

Correspondence: Please support Plan F, and do not renew leases to dairy and cattle ranchers at Point Reyes. In a period of profound environmental degradation and spiralling climate change, California taxpayers should not be forced to subsidize one of the key drivers behind these existential threats: animal agriculture. Dairy and cattle ranching has no place in a national park.

#6873

Name: N/A, N/A

Correspondence: I can not believe this is even a consideration! Leave the animals alone!

#6874

Name: Hagle, Gretchen

Correspondence: I am writing to urge the National Park Service to discontinue the grazing of beef and dairy cattle at Point Reyes National Seashore. This precious area has been damaged by livestock grazing which poses a threat to the environment and local wildlife and it should be protected and used to serve the public good, and not for the benefit of the livestock industry.

I strongly oppose Option B and any other proposal that would be fatal to Tule Elk or other wildlife to the benefit of ranching operations, and encourage the agency to adopt Option F to discontinue grazing and allow members of the public to enjoy this beautiful park and to be enriched with opportunities to visit and appreciate this special place.

#6875

Name: HUMPHREY, RANDOLPH

Correspondence: I oppose any culling of elk on our public land. There should be no subsidized grazing by private ranchers, nor should any of our land be converted to agricultural crops. Private use for crops or livestock is not why public lands were established.

#6876

Name: English, Barbara

Correspondence: I am writing to urge the National Park Service to discontinue the grazing of beef and dairy cattle at Point Reyes National Seashore. This precious area has been damaged by livestock grazing which poses a threat to the environment and local wildlife and it should be protected and used to serve the public good, and not for the benefit of the livestock industry.

I strongly oppose Option B and any other proposal that would be fatal to Tule Elk or other wildlife to the benefit of ranching operations, and encourage the agency to adopt Option F to discontinue grazing and allow members of the public to enjoy this beautiful park and to be enriched with opportunities to visit and appreciate this special place.

#6877

Name: Gutierrez, Cayla

Correspondence: I am writing to urge the National Park Service to discontinue the grazing of beef and dairy cattle at Point Reyes National Seashore. This precious area has been damaged by livestock grazing which poses a threat to the environment and local wildlife and it should be protected and used to serve the public good, and not for the benefit of the livestock industry.

I strongly oppose Option B and any other proposal that would be fatal to Tule Elk or other wildlife to the benefit of ranching operations, and encourage the agency to adopt Option F to discontinue grazing and allow members of the public to enjoy this beautiful park and to be enriched with opportunities to visit and appreciate this special place.

#6878

Name: Kuelper, Carol

Correspondence: The Point Reyes National Seashore is supposed to be managed under the Point Reyes Act for maximum protection, restoration and preservation of the natural environment. There is no mandate for prioritizing commercial agricultural leases on these public lands.

Natural values, native wildlife, public access and enjoyment should take priority over commercial activities at Pt Reyes.

The tule elk are an important part of the landscape at Pt. Reyes. It has taken a lot of time and money to restore tule elk to Pt Reyes, the only national park where they live. They should be allowed to roam free and forage in the park - not shot, removed, fenced or treated as problem animals.

At this moment, Pt Reyes ranches enjoy subsidized grazing fees and housings well as taxpayer-funded infrastructure and road improvements and publicly funded projects. Commercial activities at Pt Reyes should be required to accommodate native wildlife - not the other way around.

The park service should not allow any new agricultural activities at Pt Reyes. Expanded ranching of sheep, goats, pigs, and chickens will attract native predators such as coyotes, foxes, and bobcats creating new wildlife conflicts.

Cattle ranching should be only allowed if it's consistent with preserving the natural environment. Mowing should not be allowed in park areas where they harm endangered species or wildlife habitat, impartiality water quality, cause excessive erosion or spread invasive plants/ diseases.

Cattle are the seashore's primary source of greenhouse gases. Therefore the Park Service's preferred plan is inconsistent with its own "Climate Friendly Parks" plan.

Killing tule elk to accommodate ranchers in a National Seashore is not an alternative. I choose alternative F.  
Thank you for your consideration!

#6879

Name: Holland, Richard

Correspondence: The Marin Horse Council, supporting the equine community in Marin since 1981 and partners with Point Reyes National Seashore since its founding, agrees with the park superintendent and staff that the preferred alternative in the Draft Environmental Impact Statement for the General Management Plan Amendment for Point Reyes National Seashore and the North District of Golden Gate National Recreation Area best supports the NPS's ability to maintain historic resources and cultural landscapes that are integral to the park's historic districts.

Not only do the ranches continue to uphold the original intent for the creation of this national park, they are a living demonstration of our historical and cultural heritage. Marin's dairy ranches were the first commercial dairy operations to support the development of the Bay Area, and as they were of economic importance 150 years ago, they continue to be of economic importance to our county and region. Together with cattle, horses and other equines represent both the past and future of the cultural and historic landscape of West Marin.

The two main arguments to oppose continued ranching in the seashore are "to restore wilderness" and "the climate impact of the ranches." For 3000 years the region has been farmed by the local population, so a "restoration of wilderness" is a biological proposition without clear meaning, as well as one that runs contrary to the Park's mission of preserving the culture heritage of West Marin. Marin County is an international leader in an agricultural practice known as Carbon Farming-we are demonstrating the benefits of soil carbon sequestration and are working with our local ranches to be "carbon sinks" rather than "carbon emitters." Our agricultural production can be a sustainable model for agricultural practices nationwide-and we have some of the best organic dairy products to show for it!

We have recently supported the reopening of the park's Horse Camp and bolstering of the Mounted Patrol, and look forward to supporting the sustainable historic ranching at Point Reyes National Seashore-as well as the tremendous natural resources that "our park" offers. We look forward to passing on this natural beauty for generations to come. Thank you for protecting our National Seashore!

Richard Holland President, Marin Horse Council Marin County

Supporting technical documents: <https://www.carboncycle.org> <https://www.cdfa.ca.gov/oefi/healthysoils/>  
<https://www.4p1000.org> <https://www.marinhorsecouncil.org> <http://www.rickholland.com/carbon.html>

#6880

Name: Postel, Rus

Correspondence: As a Marin County resident, I visit PRNS and GGNRA several times every year. These are beautiful areas and I am always renewed and awed by my visits. I have read the Sierra Club position letter and agreed with that position. Ranching degrades that environment and prevents the native species from thriving. Your proposed report misses the mark, fails to come to terms with the impacts of ranching and does not rectify the fact that the plan continues to break basic law regarding the nature and purpose of the National Park Service. I urge you to follow the Sierra Club suggestion and address these issues in a amended EAR. Rus Postel

#6881

Name: Vendetti, Marc

Correspondence: I am in favor of uses that do not impair the land as that is defined in the law.

#6882

Name: Barnett, Sharon

Correspondence: I am a Marin County resident and co-owner of natural history tours company, Marin Nature Adventures. I am also a College of Marin Faculty member and Lead Hiking Marin Trails and a Science Specialist at Marin Country Day School. Saturday I am bringing my COM hiking class to Pierce Point specifically because it is the Tule Elk rutting season. Tule Elk are a success story. They should be allowed to roam free and forage in the park - not shot, removed, fenced or treated as problem animals. I am for nature/wildlife and LESS ranching. It is enough to have cows on our public lands. The Park Service should NOT allow any new agricultural activities (pigs, goats, etc) at Point Reyes.

Thank you for not succumbing to commercial agriculture and instead being a champion for our wildlife.

Sincerely, Sharon Barnett

#6883

Name: Borns, Laura

Correspondence: Please stop considering killing wild elk in Point Reyes to make room for more farm animals. This goes against everything California represents. As a forward-thinking state we stand for preserving the environment, and this would be a step in the opposite direction. Please do the right thing and vote no.

#6884

Name: N/A, N/A

Correspondence: I am writing to urge the National Park Service to discontinue the grazing of beef and dairy cattle at Point Reyes National Seashore. This precious area has been damaged by livestock grazing which poses a threat to the environment and local wildlife and it should be protected and used to serve the public good, and not for the benefit of the livestock industry.

I strongly oppose Option B and any other proposal that would be fatal to Tule Elk or other wildlife to the benefit of ranching operations, and encourage the agency to adopt Option F to discontinue grazing and allow members of the public to enjoy this beautiful park and to be enriched with opportunities to visit and appreciate this special place.

#6885

Name: McBride, Mikki

Correspondence: To Whom it May Concern;

I'm writing this because I'm familiar with Point Reyes and believe it should remain in the natural state it was meant to be protected in. The Tule Elk have just as much right to live their lives as all humans do. If ranchers want to raise cattle, then they need to find another way to do so and not put their beef on our public lands and mess it up with that many head of cattle. It was never meant for that. Point Reyes is a beautiful park land on our gorgeous California coast. Please, for God's Sake, leave it be natural and it was meant to be. People have come from all over the world just to visit there. Please, please leave it alone.

Respectfully,

Mikki McBride

#6886

Name: Smith, J.

Correspondence: I am writing to urge the National Park Service to discontinue the grazing of beef and dairy cattle at Point Reyes National Seashore. This precious area has been damaged by livestock grazing which poses a threat to the environment and local wildlife and it should be protected and used to serve the public good, and not for the benefit of the livestock industry.

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#6887

Name: Riggleman, Crystal

Correspondence: I am writing to urge the National Park Service to discontinue the grazing of beef and dairy cattle at Point Reyes National Seashore. This precious area has been damaged by livestock grazing which poses a threat to the environment and local wildlife and it should be protected and used to serve the public good, and not for the benefit of the livestock industry.

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#6888

Name: Schatz , Jacque

Correspondence: I am writing to urge the National Park Service to discontinue the grazing of beef and dairy cattle at Point Reyes National Seashore. This precious area has been damaged by livestock grazing which poses a threat to the environment and local wildlife and it should be protected and used to serve the public good, and not for the benefit of the livestock industry.

I strongly oppose Option B and any other proposal that would be fatal to Tule Elk or other wildlife to the benefit of ranching operations, and encourage the agency to adopt Option F to discontinue grazing and allow members of the public to enjoy this beautiful park and to be enriched with opportunities to visit and appreciate this special place.

#6889

Name: Tokcan, Sebnem

Correspondence: Please do not kill wild life for cattle grazing. We need their presence!

#6890

Name: Olive-Lammers, Jean

Correspondence: I strongly support the historic ranches and working dairies in the Point Reyes National Seashore and granting them 20 year or longer leases.

The ranches and working dairies make the park special. I value the rich history of non-corporate, family agriculture, the vistas of open fields with livestock and the longtime stewardship the ranchers provide. Too many people only know cities and recreational areas. Point Reyes is a mixed use park and better for that.

Please don't change the park with an elitist experiment to recreate "wilderness" which gets filled with recreational users ignorantly/innocently (or callously) causing harm and wear. There is an ecosystem there now based upon decades with agriculture. Let's support best practices and keep you it with the mixed use we have now.

Another key point- with the vagaries of government funding for parks can we count on providing stewardship comparable to that of the ranchers? Deferred maintenance and shutdowns have disastrous impacts.

For the Elk the baseline should be the 1998 EA, and we should not be taken in by romanticized views and allow unmanaged populations.

Please grant long leases (20 year or longer) are critical. Shorter leases undermine the viability of the dairies and ranches and limit the resources they can obtain or rationally invest in operations. Short leases are a sneaky way of setting them up to fail. They do not honor the spirit of cooperation and partnership that established the park.

Thank you. I hope to see working agriculture continuing.

#6891

Name: Pechin, Pauline

Correspondence: I am writing to urge the National Park Service to discontinue the grazing of beef and dairy cattle at Point Reyes National Seashore. This precious area has been damaged by livestock grazing which poses a threat to the environment and local wildlife and it should be protected and used to serve the public good, and not for the benefit of the livestock industry.

I strongly oppose Option B and any other proposal that would be fatal to Tule Elk or other wildlife to the benefit of ranching operations, and encourage the agency to adopt Option F to discontinue grazing and allow members of the public to enjoy this beautiful park and to be enriched with opportunities to visit and appreciate this special place.

#6892

Name: Dame, Wendy

Correspondence: Please do not even consider killing the native Tule Elk. Please do not renew leases of land for grazing cattle. Change the culture of public land use being used for cattle grazing and let it be natural public land for the people.

#6893

Name: Carothers-Liske, Jennifer

Correspondence: The NPS is engaging in a specious and backhanded review process here and any recommended option that does not call for the gradual (5 year option F is sufficient) phase out and COMPLETE AND PERMANENT REMOVAL AND TERMINATION of all private ranching operations and leases within the established boundaries of the National Seashore is utterly unacceptable. Those within the park management structure who have drafted this utterly biased Pro-Ranching oriented set of recommendations that fly in the face of the NPS own assessment of the degradation that ranching inherently inflicts on the fragile ecosystems of the Point Reyes Peninsula clearly fail to understand or acknowledge that the NPS and the Federal Government has violated federal statutes repeatedly at Point Reyes and failed to honor the public trust to protect the ecosystem and its native flora and fauna for the benefit and enjoyment of future generations. This is a legal matter of honoring the articles and ideals under which the Park was created and wherein the ranchers were paid in full at existing market valuation for their land, and then given a TEMPORARY GRACE period "sweetheart" deal to remain for 25 years on the public dime and at the critical and continued imperilment of native plants, birds, fish, and terrestrial wildlife. We are many decades past the point that ranching should have already been long eliminated at PRNS, and it is high time to rescue one small corner of Marin County from the ongoing degradation

of livestock operations. Pretty simple stuff. People do not come from all over the world and object millions and millions of dollars into the local economies of Marin County businesses in order to see cattle in our national park. Enough is enough. . , There are plenty of cows, dairy and beef production operations beyond the boundaries of the National Seashore. Our majestic coastal National Seashore is an imperiled treasure and the endemic plants and wildlife deserve to be safeguarded once and for all against the continued depredations of the human extraction paradigm. No more ranching in our National Park.

Jennifer Carothers-Liske Education Specialist MPT

#6894

Name: N/A, N/A

Correspondence: Preserve our wild species. Adopt Alternative F!

#6895

Name: N/A, Diane

Correspondence: The following are my comments to the DEIS proposal of the Point Reyes National Seashore September 2019

I DO NOT DO SUPPORT THE PREFERRED ALTERNATIVE B.

NOR do I support any of the remaining alternatives.

I'm a 4th generation Marin County Rancher born and raised in 1966 and currently living on the M Ranch with generations 5 and 6 also directly involved in this Historical and Cultural Resource located in the Point Reyes National Seashore. For over a century my family has been surviving and providing nutritional necessities, milk, beef and multiple products used daily by the people of this county and far beyond. In that time my family has developed first hand knowledge of what this land is capable of. All the Ranchers in the PRNS are the experts of these lands. Growing, raising and Providing local products not only provide the best possible nutritional value, but contribute to the local county and state financial stability. Then the NPS took it away. Never was it the intention of anyone including the NPS for any of us to "Quit" ranching. I now am repeatedly hearing; Just go purchase another ranch! That is not possible with the pennies, yes pennies that were given for our land. I know you all think we got rich off this, but that is not accurate! First hand from My grandfather who said he was threatened to have his ranch taken from him or he must just take what they gave him. I can't speak for every ranch, but we didn't receive enough to purchase any other land or ranch. It was a bitter subject of which I remember well and unfortunately has only gotten much worse and more stressful.

First off,

Alternative B plans on zoning areas on the ranches that have been in existence long before the NPS took possession. All the zoning, time, money and effort on this will create the need for more time, money and effort, including permits, paperwork etc. causing much unrest and waste of millions even billions of dollars. However its being done.

Zoning-

There are inaccuracies in the provided zoning maps need which need to be situation specific, and looked at in person with flexibility and consulting the knowledgeable people of the land. There have not been any experts in the Farming and Ranching Industry who were consulted nor who have viewed this area! That in itself is really scary! No one has completed extensive enough research to be able to dictate the future of PRNS and Ranching. The maintenance jobs and land care that has been provided by the ranchers with intention to thrive, protect and create homes for many varieties of animals, despite what is flying through some groups who intend to remove



ranching from this area, is done from the heart and with love. As crazy as it may seem to some, we love the land that we've devoted our complete life to. The NPS needs to look at each ranch independently as the lands vary geologically.

Preparers-

These people are in a position to decide our fate! Everything multiple generations have spent their/our whole life creating is in jeopardy. **THIS IS NOT A GAME! ITS OUR LIFE, HEART SOLE AND FUTURE that's AT RISK!** Entire lives spent here providing multiple sources of nutrition and many, many products for your comfort and daily life ease!

The belittling of this occupation and the drive to rid the area of necessities, is pretty easy when your bellies are full and your conveniences are plenty. In the past few years the US has put over 20,000 family farms and ranchlands out of business. What is your plan for replacing the necessities they've provided?? Creating more manufacturers who make fake chemical reproductions?? That will not help the world from destroying itself!

Its common knowledge that children who follow in their parents footsteps become professional experts and most knowledgeable in their field or industry. This isn't a game, its our life! We've spent over a century devoted to!

Diversification-

The proposed action to allow ranchers to utilize 2.5 acres for diversification and the purpose of supplemental income, is supposed to be in the ranch core area only. But geological constraints could exist in those areas which will be defined in the ROA. Another can of worms.... Identifying each of the ranches location of the 2.5 acres to be used for diversification. What if its not geologically possible to use this area near the core? Are we able find an alternative suitable location? Its a crazy idea to create any situation possibility that will not allow the use of water??

Is this a joke? How do you see this happening? I'd really love to hear how this is supposed to work, from what is here in the alternative, nothing is possible.

As you know two and a half acres of land is not large enough to create any real profit. However if one does, It also states in the DEIS that if there is profit of any kind from this 2.5 acres, the rent will increase??

Who's getting paid to sit in their little offices to create plans that leave no real opportunity!

The top few on the preparers list make more than our gross ranch income for a year, and we have multiple family members living from this income. The 2.5 acre, option is completely misleading to think you're creating a great opportunity! It's nothing more than the NPS trying to look good with a new option that is set up to fail.

Elk-

The inclusion of the Drakes Bay Elk herd at this point after the failure of implementing the original management plan, has a significant impact on the future of our ranches and families. What about the Limintour Herd which has spread to several other sub-herds? 1998 GMP there was an elk management plan which appears to be forgotten....??

There is no other current written or plan otherwise for managing the Elk in these herds. Its misleading and incorrect to say that the Drakes bay herd is doing fine and not disrupting or destroying the ability for the ranch family's survival! The Elk are depleting food sources designated and maintained for the purpose of cattle and the survival of ranches. They are consuming much of the supplemental cattle feed, as well as the grazing areas. The cattle in all areas, on all ranches, are fenced in! The Elk are not! Due to the failure and lack of management, we now have this situation! Not only are the Elk depleting food sources from their ability to roam freely over areas that they were never intended to , they are injuring cattle and other animals! This is NOT okay!! The NPS has

introduced the coyotes several years ago, of which there were none. Now I watch as these animals who don't eat only their rodent food sources, but the tiny newborn calf before he's able to stand, they rip out the guts and begin eating the little one while still alive!! There are no management plans for them either? They run in multiple large packs; First hand I've sadly observed baby calves being eaten alive while staring at me wondering what they did to deserve this horrible pain! It's sickening to think they were put here for the controlling of deer?? Unknowledgeable people promoting the placement of these is sickening.

What are the proposed New Management Strategies for the Elk and Wildlife? From what I've seen, this was prepared by many who have varying degrees in formal education, but no agriculture experience at all. Please explain how this makes the preparers knowledgeable enough to create multiple working plans in an area they have little to no practical knowledge? We are the experts of this land which we've devoted our life to. What "New opportunities and infrastructure for facilitating public use and enjoyment in the planning area would be implemented" The proposed public use of a newly created trail and road through the ranchlands are completely, impossible and crazy dangerous. This is counterproductive in many levels. Safety i.e.. animals vs people vs dogs, fences being cut left open, gates left open, feces, and other unnecessary items left and rely on others to pick up after them!

Remember when the government was closed and people visited was when the park was shut down? People, caring, kind people who lazily piled garbage, feces, and other unnecessary items in vital areas because there were no housekeepers to follow them around and pick up after them! Leaving much of this proposal open ended without specific ideals or plan details and is extremely inadequate and counterproductive for the amount of money it took for this DEIS to be drafted. There are no reasonable resolution plans here! Just potential ideas in multiple directions.

This DEIS involves multiple families and generations devoted to spending our whole life for the survival of the people of this country! People sadly have no real clue. Just many wild, inaccurate guesses! Zones, subzones.....

The environmental impacts of Micromanaging ranchers and our professional knowledge of it, is crazy!

Public use and new infrastructure. .... what? Why is it not completely presented? What happens when (and it will happen) that a tourist or many, will become injured from walking or hiking through the working areas. What happens when a person becomes injured from an Elk? Since the NPS owns the land, I believe it is their responsibility as owners for any repercussions from ANY injury that is sustained from the Elk. What if a cow gets, and a visitor hit/hurt/killed on the road because the visitors have damaged the fences by cutting the wires, as they do, and pull them open so the cattle can walk out of the fence onto the roads?

Then there is the problem of maintenance. If the NPS owns the land and buildings then why isn't it their responsibility to maintain it? The law states that any land or property owner who rents, has to maintain, repair and make the place safe for the occupants renting. The ranchers do keep up their places, but uncertainty in how long we will be living here, creates quite an unsettled feeling as well as how much we can afford to invest in our futures is at stake here.

There is mention of a fund for maintaining infrastructure with but there is grossly incomplete information on implementing, managing and maintaining this fund.

What if we get a 20 year lease and its time ends? Are they going to renew for another 20 years without hassle? We don't own it remember, are but we do have businesses that require planning and are the sole means of our survival.

The whole park is comprised of near 80,000 acres and of that 27,000 are occupied with ranches. Why is the other near 60,000 acres can't be made palatable for Elk? Why are you not making use of that 60,000 acres for the Elk? It's there and available?? It's the original families and their next generations have kept the ranches viable by religiously improving and maintaining our land. Why can't the NPS and the Elk conservatives make it inhabitable for them?

The tension created with all these crazy proposals and threats has caused stress on all our families both individually and collaboratively. Its extremely sad to see and deeply feel the one time very close families, distancing from each other..... Tension, Stress, Health Issues, Losses..

THIS IS NOT A GAME! ITS OUR LIFE!

#6896

Name: N/A, N/A

Correspondence: I disagree with what is happening!

#6897

Name: Fowler, Rachel

Correspondence: I am writing to urge the National Park Service to discontinue the grazing of beef and dairy cattle at Point Reyes National Seashore. This precious area has been damaged by livestock grazing which poses a threat to the environment and local wildlife and it should be protected and used to serve the public good, and not for the benefit of the livestock industry.

I strongly oppose Option B and any other proposal that would be fatal to Tule Elk or other wildlife to the benefit of ranching operations, and encourage the agency to adopt Option F to discontinue grazing and allow members of the public to enjoy this beautiful park and to be enriched with opportunities to visit and appreciate this special place.

#6898

Name: Sullivan, Mary

Correspondence: I am changing my position regarding the extension of cattle grazing in the Point Reyes National Seashore area from my comments I submitted earlier which was to stop grazing cattle. I know that Point Reyes National Seashore would not exist without the agreement between the National Park Service and the cattle ranchers. Because of their involvement in creating Point Reyes National Seashore, I approve that the ranchers can continue to graze their cattle. However, I DO NOT WANT THEIR RANGE EXPANDED OR FOR THEIR CATTLE HERDS TO INCREASE IN SIZE. The environment must be protected from degradation and loss of native plants and trees as well as protecting the wildlife including the Tule elk herd. I OPPOSE THE KILLING OF THE TULE ELK HERD!!!! Any proposal by the National Park Service to allow for killing the herd will negate my approval of allowing the ranchers to continue to graze for the next 20 years!!!! Killing the herd or most of the herd to make more profit for the ranchers is outrageous!!!! I can understand culling a FEW sickly ones, but not healthy ones!

Another point - with Climate Change rapidly occurring, we need to do a lot to curb greenhouse gases before it is too late. The raising of beef cattle and dairy cattle contributes greatly to the development of greenhouse gases. The loss of trees amplifies the rate of Climate Change. How wise is it to allow for more cattle raising?

Although, I now live in Southern California, my roots are from Sacramento, Napa, Marin, and Sonoma counties. I have spent a lot of time in Point Reyes National Seashore, and love it dearly. It is a treasure. I have also loved watching the elk herd. Cattle are so common, but the majestic Tule Elk herd is a rare and unique sight to be seen!. Don't deprive the public the joy of seeing such a wonderful sight! The Tule Elk deserve to live on the land as well!

#6899

Name: Brandt, Ronna

Correspondence: We must protect our native species. This government in charge is doing everything in it's power to dismantle protections for animals and our sacred parks and streams. It's got to stop now!

#6900

Name: N/A, N/A

Correspondence: Tule Elk should be protected for the survival of their species. They have already gone through a huge genetic bottle neck when they were almost completely wiped out except for 20 individuals. Every gene allele is important for the long term sustainability of the herd. The National Park should be protecting all Tule Elk, and allowing new herds to form and to TAKE DOWN THE FENCE at Pierce Point and allow all Tule Elk to roam free. I do not support granting 20 year leases to cattle and dairy industry. Climate science has indicated we have less than 12 years to mitigate the worst of climate catastrophe. Allowing business that has been linked to water pollution, species extinction and in Point Reyes is the culprit of over 60% of the greenhouse gas emissions, it is not a good idea to give that same industry a 20-year lease to continue degrading our national park. Point Reyes is a refuge to thousands of plants and animals. Point Reyes can be a leader in the fight for climate justice, and it starts with phasing out Beef and Dairy operations and restoring the land to its natural state. The EIS has NO MENTION of the effects of climate change in it, and does not include any information of the cattle and dairy's impact on climate change within the park.

#6901

Name: Fukumoto , Barbara

Correspondence: Much private land is devoted to farming and grazing. National Parks and Seashores, on the other hand, are special places set aside to preserve \*natural\* places and wildlife for the enjoyment of the American people, including future generations. This high purpose must be clearly prioritized above exploiting public land for the subsidized profit of the few.

According to the Pt. Reyes Act, itself, this Seashore is to be managed for "maximum protection, restoration, and preservation of the natural environment." This language makes clear that nature, including wildlife and native grassland, is the priority-not commercial activities like ranching and farming.

This painstaking restoration of the native ecosystem, part of the core Point Reyes mission, has resulted in the recovery of the native Tule Elk population at Point Reyes. The Tule Elk should not be shot, fenced or removed, but allowed to forage freely. Commercial activities at Point Reyes should be required to accommodate native wildlife - not the other way around. Cattle ranching should only be allowed if it's consistent with preserving the native ecosystem. And likely it is time to rethink the subsidies that the ranches receive for grazing fees and housing and the taxpayer-funded infrastructure, road improvements, and other projects.

Finally, the Park Service shouldn't allow any new agricultural activities at Point Reyes or expand the land allotted to agriculture (or ranching). Planting artichokes or other row crops would encroach on natural grasslands. And introducing sheep, goats, pigs or chickens will attract native predators such as coyotes, bobcats and foxes. Expanded farming would only create new wildlife conflicts.

Do not expand agriculture or ranching. Do not kill, fence or remove the native Tule Elk that have been recovered through great effort and expense. Do rethink ranching subsidies, especially in view of the greenhouse gas emissions of cattle. And do uphold the Point Reyes National Seashore Act and prioritize protecting, restoring, and preserving this special corner of Creation in its natural state for this and future generations to enjoy.

Thank you for your consideration.

#6902

Name: N/A, N/A

Correspondence: Get ranching out of Point Reyes and protect this ecological treasure!

#6903

Name: Cornwell, Nancy

Correspondence: I came to the Bay Area 52 years ago, just out of college, to teach in an elementary school. I first lived in San Francisco and subsequently moved to Marin County. Right from the beginning Point Reyes was my favorite place to go to on the weekends. I have always felt unbelievably lucky to have such a spectacular and peaceful place so close by. As much as I like ranching and farming, I do not feel that the Point Reyes National Seashore is the appropriate place for it. I am in favor of Option F to remove all ranching and return the land to its natural, native state.

#6904

Name: Bertano, Silvia

Correspondence: Stop Elk Hunting!

#6905

Name: WEIBEL, ANNEMARIE

Correspondence: I am so very grateful that Marin County had so many activists that were able to convince congress to create all these protected areas so people can be surrounded by fresh air, wildlife, and take their families to the ocean, the beaches, hiking, biking, canoeing and kayaking. It is so nurturing and healing to drive through farmland and see no industry, just cattle, chickens, horses and acres of open land knowing that Caltrans was wanting to build a 4 lane highway from Berkeley to Point Reyes and ruin this area forever. There's no mandate for prioritizing commercial agricultural leases on these public lands. Natural values, native wildlife, public access and enjoyment should take priority over commercial activities at Point Reyes. That was the concept.

The Tule elk are an important part of the landscape at Point Reyes. Their recovery is a result of successful native ecosystem restoration, which is a key element of the Park Service's mission. It's taken a lot of time, money and effort to restore Tule elk to Point Reyes, the only national park where they live. Tule elk should be allowed to roam free and forage in the park - not shot, removed, fenced or treated as problem animals.

The Park Service shouldn't allow any new agricultural activities at Point Reyes, nor introduce different wildlife in the area that would only create new problems.

Right now the Point Reyes ranchers enjoy not only subsidized grazing fees and housing, but also taxpayer-funded infrastructure and road improvements, and publicly funded projects.

Cattle ranching should only be allowed if it's consistent with preserving the natural environment. Cattle are the seashore's primary source of greenhouse gases. The Park Service's preferred alternative is inconsistent with its own "Climate Friendly Parks" plan. I know that when the plan was created it was crucial to have the buy in from the ranchers.

Mowing shouldn't be allowed in park areas where it will harm endangered species or wildlife habitat, impair water quality, cause excessive erosion or spread invasive plants/diseases. The Point Reyes National Seashore and other national parks nearby were created with the goal to be managed under the Point Reyes Act for "maximum protection, restoration, and preservation of the natural environment."

The Point Reyes National Seashore General Management Plan Amendment and Environmental Impact Statement is proposing to dedicate one third of Point Reyes National Seashore to cattle ranching and includes plans to kill off Tule elk that frequent the area. This is the opposite of what so many futuristic thinking activists fought so hard for.

This plan would only benefits twenty-four cattle ranchers who sold their land to the public 60 years ago, but still use the national park to graze their cattle.

Please do not cave in to the pressures by these cattle ranchers!

It seems to me that the Environmental Impact Statement can not in any way attest that dedicating one third of the Point Reyes National Seashore to cattle ranching and killing off Tule elk that frequent the area can in any way benefit the environment.

If their parents and grandparents of the ranchers knew about this they would turn over in their graves.

Quote by Rachel Carson: "The more clearly we can focus our attention on the wonders and realities of the universe about us, the less taste we shall have for destruction."

#6906

Name: Dietrich, Daniel

Correspondence: September 22, 2019

To: Cicely Muldoon - Point Reyes National Seashore Superintendent RE: Point Reyes National Seashore GMPA/EIS comments

I am a homeowner and full time resident of Inverness, CA. My full time work is guiding tourists within Point Reyes National Seashore for the purposes of viewing and photographing the scenic beauty and the wildlife within the National Seashore. I have held a permit for Commercial Use Authorization from the NPS for this business for the past 5 years.

Over these past 5 years, I have guided well over 1000 tourists who have desired to visit this incredible National Park. These tourists have come from as far as India, Scotland, Ireland, South Africa, Russia and many other countries. They have come from Massachusetts, New York, Florida, Texas, Alabama, Michigan and many other states. A reasonable portion of my guests have come from within driving distance including Berkeley, Alameda, Richmond, San Francisco and Oakland. My guests have also included locals who live right here in Point Reyes and Inverness who wanted to experience the park in a new manner joining me. I am within the borders of Point Reyes National Seashore nearly every single day that I am not traveling, either as a guide or for my own personal enjoyment.

I am deeply saddened and concerned by the preferred alternative choice of the National Park Service for the future management of Point Reyes National Seashore. Alternative B gives preferential treatment to a dozen lease holders within the park over the rest of the public and will have a devastating impact on wildlife and the environment. The NPS must comply with the Organic Act which states it must manage the park "by all such means and measures...to conserve the scenery and the natural and historic object and the wildlife therein. . .as will leave them unimpaired for the enjoyment of future generations."

The National Park Service founding statute states nothing "shall be leased, rented or granted to anyone on such terms as to interfere with free access to them by the public." And the NPS is required to manage the park with "the maximum protection, restoration and preservation of the natural environment within the area."

Option B does not do this. Per the EIS, option B has a negative effect on soil, water quality, vegetation, wildlife, tule elk and air quality. Option F improves soil, improves water quality, improves native vegetation, improves wildlife health, protects tule elk and improves air quality. How can the National Park Service justify choosing option B over option F based on the finding of the EIS and its mandate of the maximum protection of the natural environment?

Please see the list below of the following items that the EIS does not properly address and that the park must provide further details to the public about its choices and plans:

1) The killing of native tule elk

The number one animal that my guests request to view and photograph is the Tule elk. What is the purpose of killing the tule elk? Please state why cattle take priority over the native tule elk. If there is a conflict for resources (grass) why aren't cow numbers reduced? Why must native animals be killed to provide more grass for cows? How does killing the tule elk fit in the park's mandate to provide maximum protection to the natural resources? The park has an obligation to restore the park. Elk roamed this land in the thousands in the 1800s. The park should allow free roaming elk within its entire borders.

2) The conversion of park land to row crops and silage fields

Why is the National Park Service allowing public land to be converted to row crops? This goes against the mandate the NPS has for providing maximum protection to the natural resources and to provide the public with access to its land.

Row crops will remove public access. Row crops will remove habitat for wildlife. Row crops will introduce conflict with native animals. Row crop operations will kill native animals who live on these current grasslands. Row crops will remove hunting grounds for native animals. Row crops will destroy native plants. How is it even possible that this is being considered?

The EIS did not properly address the impact that allowing row crops will have on native wildlife. How many snakes, gophers, mice, lizards, weasels, badgers and other wildlife will be displaced or by row crop operations? What native plants will be destroyed by such action? Please provide a detailed analysis on what impact the row crops will have on these individual species. Please describe the additional costs to the tax payers for fencing, enforcement, management and other requirements surrounding row crops.

It is stated that no tilling will be allowed in the allowance of row crop planting. How can this statement be true if tilling is already allowed in the National Park? Today disc harrows are used to till the soil in preparation for silage planting. According to Wikipedia a disc harrow is:

“...an agricultural implement that is used to till the soil where crops are to be planted.”

If tilling is not permitted for agricultural use, then disc harrowing should not be allowed. Please provide an analysis of how native wildlife and plants are affected by disc harrowing.

Silage fields are known homes for many species. A report by Point Blue noted several species of birds nesting in the silage fields. How does the park ensure no birds or wildlife are disturbed or killed during silage mowing? The park sends a biologist down trails prior to mowing to make sure there are no nests disturbed. Why is this not done prior to silage mowing? Please provide details on how maximum protection of nesting birds and other native wildlife is ensured in silage fields prior to mowing.

Silage mowing is an attractant for ravens and crows. These birds follow the silage mowing equipment closely and can be seen gathering the remains of animals displaced or killed by the mowing. The park has an obligation to protect these animals and not allow them to be mowed over. The attraction of ravens has likely had a major impact on the snowy plover population. The majority of snowy plover nests in 2019 were destroyed by ravens. If the population of ravens is increased by silage mowing, how can the NPS even consider adding new silage fields elsewhere in the park? Please provide a detailed analysis on the effects that silage mowing and the disproportionate number of ravens and crows due to this mowing has on snowy plovers and other species.

3) The introduction of domestic animals such as sheep, goats, chickens and pigs

This is deeply disturbing. Today the ranchers are demanding the removal of a grass eating elk. What is going to happen when a coyote takes one of these new domestic animals? What happens when a bobcat or fox or weasel or badger takes one of these animals? No adequate plan is discussed in the EIS that addresses the conflict that will arise from the introduction of these domestic animals. The NPS must disclose its plan for these conflicts and what the cost will be to the tax payers and to the wildlife. An enforcement plan must be made available. What resources and how they will be paid for must be made available before any new animals are introduced to the park.

The EIS does not address the impact of the new waste from the domestic animals. A common practice today with pig urine is for it to be misted into the air to remove it from the farm. Will this be allowed in the National Park? How will the pig urine be removed? If the NPS is going to allow pigs in the national seashore it must disclose how all waste will be removed, how this will be enforced, and at what cost to the public.

What effect will chicken waste have on our soil and waterways?

With the introduction of new grass eating animals such as sheep and goats, there is no mention of any reduction of cows within the seashore. If there is not enough grass for both cow and elk, and elk are being killed to provide more grass for cows, then surely an increase in sheep or goats should result in the lowering of cattle numbers. Why must elk be shot because there isn't enough grass but we then allow the introduction of goats and sheep? No new domestic animals should be allowed into the seashore. If new domestic animals enter the seashore, the NPS must provide a detailed report of the anticipated grass consumption of any new domestic animals and an equivalent number of cattle must be removed.

No new domestic animals should be allowed in the National Park.

#### 4) NPS ensuring ranching profits

The NPS has stated the proposed diversification changes would allow ranchers to "react to fluctuations in the economic market." It is not the responsibility nor should it be the goal of the National Park Service to ensure the profitability of operations within the park. This being the main reason for NPS to allow diversification opportunities, no diversification should be allowed in the National Seashore.

#### 5) Road conditions

Nowhere in the EIS is there an analysis on the impact to roads with the allowance of new diversification opportunities. Today, all day long, dozens of semi-trailers pulling tons of hay, industrial trucks hauling in feed, 18 wheelers with gas, milk trucks, silage mowing vehicles, mowers and other industrial traffic fills the roads within Point Reyes National Seashore. The road conditions in the park are atrocious. How will the park maintain the roads with the new commercial traffic for the vegetable trucks, for the increased traffic for processing, hauling, digging, planting, harvesting and other operations? What are the industrial traffic increases to support the coming and going of sheep, goats, pigs and chickens? What are the costs to the public for this road maintenance? How will the roads be maintained with the heavy increased traffic due to the diversification allowance when we can't even upkeep the road today? No new allowances should be given that will increase the industrial traffic within the National Seashore.

#### 6) Cost of ranching in the seashore

The EIS does not discuss the cost of supporting ranching in the National Seashore. The public should be informed how much it costs the US tax payers to manage ranching in the National Seashore. It should be informed on how much additional cost there will be to support the proposed plan B. Please provide all the costs associated with the implementation of plan B.

#### 7) Historic buildings



The park is proposing repurposing historic buildings to allow ranchers to set up vegetable processing facilities, cheese production, tourist accommodations and visitor store fronts. Why aren't these buildings being repurposed for public visitation, education or interpretation? How is converting these buildings to new uses keeping in step with the protection and restoration of our historic structures? Why are they being used for private profits over public access? The NPS must justify this new historic building use and provide the costs to the public for any changes in the use of these structures. Who receives the money for any visitor accommodations that may be allowed? Will this go to the public as it will be their tax dollars that will support this activity?

#### 8) Succession

What was once an effort to protect "Multi-generation beef and dairy ranching" has turned into an effort to permanently enshrine ranching within the national seashore. The NPS is now proposing that if any rancher should retire from ranching within the seashore that a Request for Proposal from outside the immediate family would determine who would succeed the lease. This could be another rancher within the seashore, or any individual or perhaps company outside the seashore. No matter which, as proposed, multi-generation family ranching would end yet ranching within the seashore would continue indefinitely. This is not protecting multigenerational family ranching. The proposed succession plan should not be allowed.

#### 9) Funding

The draft EIS fails to provide a financial overview of how any of the actions it is proposing will be enforced and paid for. Without understanding this information, the allowed proposals should not be implemented. Resource protection is the priority over all else. Budgets must reflect how resources will be prioritized and protected before any elk culling, row crops, new domestic animals are introduced or succession plans are implemented.

#### 10) Increased Public Services

The EIS provides very little discussions of new benefits to the public. Here are a few of ideas:

a) At an appropriate time in the future, retire the A ranch. Traffic at the lighthouse and chimney rock are extremely high. This location can be considered for an extension of the lighthouse visitor center, an interpretation center and can be a hub for visitation to the lighthouse and chimney rock. It can provide more housing for park employees. It can house scientific work and classrooms for students. It can provide overnight housing for workshops, classes and other visitor services. It can also be used as a parking facility for high visitor times. Instead of closing the park to all visitors on weekends during Jan-Mar from Drakes Beach to the lighthouse, the road can be left open so visitors can enjoy all the areas between Drakes Beach and A Ranch. Parking areas can be created at A ranch and smaller shuttles can be used to shuttle visitors from A Ranch to the lighthouse and chimney rock. Additional parking areas can be created at chimney rock where more people can park and walk to this location. A 1 mile hiking trail can be created from the new visitor center to the lighthouse parking lot where people can walk instead of drive, alleviating some traffic and providing a new visitor experience.

b) Expand the Elk Preserve. At an appropriate time in the future retire the J ranch. Today the tule elk have no permanent water source in the elk preserve. Approximately 1/2 of all elk died during the recent drought due to lack of water/food. This could have been prevented and is an embarrassment to our management of these native animals. Expanding the elk preserve to include the land on J ranch would give them adequate year round water. The creek that runs through J ranch was recently named one of California's most polluted streams. This would also assist in the recovery of this important watershed.

c) One heavy conflict area between elk and cattle is at the D Ranch. Elk spend a significant amount of time on the east side of Drakes Beach Road. The NPS should consider removing cattle on the east side of Drakes Beach Road to provide greater grazing habitat for tule elk. This will reduce elk and cattle conflict on this portion of the D Ranch property and provide visitors with a greater viewing experience of this native animals species.

## 11) Manure spreading

Johne's Disease has been documented in the Tule elk in the park. This disease is transferred from cows to elk through the cow manure. The NPS allows the manure from cow operations to be collected and spread on the very grass the elk consume. How does this practice provide maximum protection for this native species? What impact does the manure spreading have on the water quality? Visitor experience is significantly lessened when the manure spreading operations are in process. The smell is repulsive and the sight of manure trucks spilling liquid cow waste all over the public roadways is simply disgusting. What native animals are impacted from this practice? Are gophers, mice, snakes, lizards or other native animals displaced or killed during this practice? Please provide an analysis on the manure spreading and its effect on native plants and animals.

### Conclusion:

I am deeply disturbed and disappointed in the NPS decision to recommend the killing of tule elk, the expansion of ranching operations to include row crops, new domestic animals, and the conversion of historic buildings to vegetable processing, cheese processing, store fronts and private accommodations. During the most tumultuous time of climate change in our history and during a time of continued loss of public land, the NPS should reconsider its proposed plan of option B and choose alternative actions that prioritize the protection of our natural resources for all citizens.

#6907

Name: Weiss, Brandon

Correspondence: DO NOT ALLOW CATTLE RANCHING IN POINT REYES. Tule Elk are already incredibly threatened and this could lead to their extinction!

#6908

Name: Cornwell, William

Correspondence: I am Associate Professor and an ecologist who has done scientific research on the future of the vegetation at Point Reyes. I have published peer-review papers on the vegetation dynamics of the SF Bay Area including Point Reyes National Seashore. I am very familiar with fire ecology, climate change forecasts, and many other issues facing land managers at PRNS.

I was quite excited to read this extended and substantial work on a long-standing issue that is of great importance to the national seashore. However, after 216 pages, I was left deeply disappointed and distressed. The key questions are diffuse and poorly addressed throughout the EIS. And from a scientific perspective, this was one of the lowest quality examples of a draft EIS that I have come across in my career. The discussion of vegetation ecology is highly speculative and rarely scientific.

At the heart of the draft EIS are statements like this:

> Eliminating livestock grazing could also adversely affect several federally listed plants that occur in coastal grassland because grazing is the most effective tool for promoting their persistence with respect to competition with other non-native grassland species.

What is the evidence for this statement? Which plant species? This has references and no scientific basis, and would be a shocking statement for most SF Bay Area land managers with decades of experience in coastal grassland management. For example, the GGNRA employs many ecologists who would deeply disagree with this assertion.

I am not writing to advocate a position but rather to argue that the methodology in this draft EIS is deeply flawed and relies on baseless speculation rather than scientific evidence.

I would strongly urge the Superintendent that there needs to be higher quality methodology going into the EIS and better controls to make sure the writers of the EIS are completely isolated from political pressures. The Superintendent and other decision makers need much better science to make an informed decision on this important issue.

Sincerely, Will Cornwell

#6909

Name: Lucido, Caryn

Correspondence: I vehemently oppose the potential plan to lethally remove (kill) the Tule Elk at Point Reyes National Seashore.

Any cattle ranching and other agricultural operations must be managed to accommodate elk and other native wildlife, and should not harm wildlife habitat. Commercial lease holders should not be allowed to dictate removal or exclusion policies of wildlife on our PUBLIC LANDS.

I'm opposed to the removal of any Tule Elk from PRNS. Please reject any conversion of National Park lands to row crops or expansion of commercial livestock farming to introduce sheep, goats, turkeys, chickens or pigs which would only increase conflicts with wildlife, and degrade wildlife habitat and water quality.

This is designated national seashore, a local, regional and national treasure whose wildlife should be PROTECTED, NOT KILLED.

Thank you, Caryn

#6910

Name: Rose, Tedford

Correspondence: This is the time to let the rancher's leases end. This is PUBLIC LAND. Not land set aside for the profit of cattle and dairy production. I oppose killing native Tule Elk in order to not let the Elk feed. Have the ranchers buy some land. They certainly have been saving the money to do so. NO MORE free rides for cattle and dairy. Public land is ours. NOT THEIRS!

I am writing to urge the National Park Service to discontinue the grazing of beef and dairy cattle at Point Reyes National Seashore. This precious area has been damaged by livestock grazing which poses a threat to the environment and local wildlife and it should be protected and used to serve the public good, and not for the benefit of the livestock industry.

I strongly oppose Option B and any other proposal that would be fatal to Tule Elk or other wildlife to the benefit of ranching operations, and encourage the agency to adopt Option F to discontinue grazing and allow members of the public to enjoy this beautiful park and to be enriched with opportunities to visit and appreciate this special place.

#6911

Name: Menard, Joseph

Correspondence: 1. Under no circumstance shall the park kill any Tule Elk. 2. The park should prioritize Tule Elk habitat. 3. The park should refuse to grant 20-year permits and leases to cattle and dairy ranchers. Ranchers have overstayed their original permit limits already. Long-term leases will set a terrible precedent in favor of private, commercial industry and jeopardize the future of our parks and the health of the ecosystem. 4. Absolutely no

diversification of ranch operations. Any diversification (such as chicken coops, pigs, sheep, row crops, etc) will only serve to attract more predators like coyotes, foxes, bobcats that will be in conflict with ranch operations and have to be "managed" as well. 5. The park should revoke permits for all cattle and dairy operations and restore the leased land to its original, pre-industry state. The park should prioritize wildlife NOT commercial interests!

#6912

Name: Sterling, Jennifer

Correspondence: As a 12-year resident of Marin County and frequent visitor to Point Reyes, I am writing to urge the National Park Service to discontinue the grazing of beef and dairy cattle at Point Reyes National Seashore. This precious area has been damaged by livestock grazing which poses a threat to the environment and local wildlife and it should be protected and used to serve the public good, and not for the benefit of the livestock industry.

I strongly oppose Option B and any other proposal that would be fatal to Tule Elk or other wildlife to the benefit of ranching operations, and encourage the agency to adopt Option F to discontinue grazing and allow members of the public to enjoy this beautiful park and to be enriched with opportunities to visit and appreciate this special place

#6913

Name: N/A, Nick

Correspondence: Point Reyes truly is a natural gem to Marin, the Bay Area, California, and beyond. It belongs to all of us. I lead volunteer hikes throughout the bay area and often recommend Point Reyes because of its amazing biodiversity and scenery, but it troubles me to see our local Amazon being threatened by the financial desires of a small group of ranchers that have already been fairly compensated. Are we really ready to let Point Reyes burn for short term financial gains?

It is unfortunately clear that the historical value is not important to the NPS, since the preferred alternative B would result in ranching operations that: don't raise the same animals, are not run by the same people, and don't welcome the public.

Pierce Point Ranch seems sufficient to satisfy the historical ranching needs. Twenty-four private ranches are not needed and not effective in conveying their historical value. I question the methodology being used to maintain historic value, determine the scope of this historic value, and balance this value against other needs. One third of the park should not be dedicated to historic preservation, when a small recreated Miwok village seems to suffice for historical purposes for the displaced Native Americans. These policies are being applied inconsistently and offensively.

You already have all the details in your own EIS about the negative impacts that agriculture is having on this special place. The negative effects are almost too numerous to list. It is not just your job to conserve Point Reyes, it is all of our responsibilities.

The bounty and the history of this land is truly in the biodiversity. From the nps.gov website: "As wildland habitat is lost elsewhere in California, the relevance of the Point Reyes Peninsula increases as a protected area with a notable rich biological diversity. Over 45% of North American avian species and nearly 18% of California's plant species are found in the park due to the variety of habitat and uniqueness of the geology. Thirty-eight threatened and endangered species exist within the Seashore."

I couldn't agree more, the need to protect this habitat grows. As the steward of our land, I request that the NPS please prioritize biodiversity and environmental restoration over commercial use, and modernize the historical preservation practices to be holistic and balanced.

The NPS is not a welfare program for ranchers that have already been fairly compensated, the historical needs have been met already by Pierce Point, and with the minimal contribution of this ranching to the regional economy, I must urge the NPS to pursue Alternative F. It is the only option that prioritizes the long term value to future generations and improves the protection of biodiversity by removing one of the biggest threats, ranching.

I love the NPS and Point Reyes. Thank you for taking my concerns into review.

#6914

Name: Hamilton, Chia

Correspondence: Frankly, I'm appalled by the fact that you're thinking of destroying the Tule Elk, even one of them. The National Parks are for all the people to experience nature and your duty is to preserve that nature for everyone.

The fact that you have continued to lease land to dairy farmers consistently, in direct opposition to the intended original plan when Pt Reyes was formed, tells me you have no respect for anything but greed and power. SHAME ON YOU

And how much publicity was generated by you about this issue? Betting as little as possible. Cause if the people don't know, they must rely on you to protect their rights.

WHAT A DUMB IDEA THAT WOULD BE.

You have no intention in looking out for the rights of the people who believe they pay you to look out for all of us. Your concern is with the very few who will profit from your not enforcing those agreements

#6915

Name: Zorn, Lisa

Correspondence: I am a transportation planner and I live and work in San Francisco, and I volunteer weekly in Marin County. As a transportation planner at a public agency, part of my job is to help Bay Area residents reduce our per capita greenhouse gas emissions from mobile sources. However, it is becoming clear that animal agriculture is a major contributor to greenhouse gas emissions and it is a completely unnecessary industry. We can thrive without consuming animals or animal products, and as such, government subsidy and support of these industries is entirely inappropriate and counter to our goals as a region and as a state.

I am writing to ask you to choose Alternative F. Our public lands should not be used to subsidize violent and environmentally destructive practices. We should be supporting a transition to plant-based agriculture, and supporting the transition of animal farming to these more sustainable (and less violent) industries.

#6916

Name: Garrett, Benjamin

Correspondence: Please support Alternative F. Tule Elk are beautiful and we do not need to subsidize animal agriculture, which is a violent and unnecessary industry which is destroying our environment. Also, when you think about it when we always choose capitalism over conservation we end up with a planet that's destroyed. Do we really need another extinction when we've already paid these ranchers for this land 50 years ago. I thought we were in California!?!?

#6917

Name: Jacobson, Tom

Correspondence: Regarding The General Management Amendment Environmental Impact Statement (EIS) for Point Reyes National Seashore and the North District of the Golden Gate National Recreation Area

I am in favor of Alternative B: NPS would cap the Drakes Beach Tule Elk population at 120 (there are currently 124). "NPS would manage to the population threshold using lethal removal methods." No other Elk herds will be allowed to be "established" - live, procreate, or feed there.

Thank you

#6918

Name: Difar, Amy

Correspondence: I am writing to urge you to reconsider this ill-advised plan. The balance of Nature is too fragile to allow private citizens to kill wildlife for their own gain. The damage done has far-reaching detrimental effects on the natural world.

Every creature on the planet has a purpose. We should not attempt to change the order that Nature has so perfectly created - the very order upon which our lives depend.

Additionally, it is extremely important to me that we leave public lands intact for future generations. The point being that these are public lands - they do not belong to private livestock owners nor do they exist for the benefit of those private citizens.

#6919

Name: Gosse , Holly

Correspondence: I am writing to urge the National Park Service to discontinue the grazing of beef and dairy cattle at Point Reyes National Seashore. This precious area has been damaged by livestock grazing which poses a threat to the environment and local wildlife and it should be protected and used to serve the public good, and not for the benefit of the livestock industry.

I strongly oppose Option B and any other proposal that would be fatal to Tule Elk or other wildlife to the benefit of ranching operations, and encourage the agency to adopt Option F to discontinue grazing and allow members of the public to enjoy this beautiful park and to be enriched with opportunities to visit and appreciate this special place.

#6920

Name: Cliggott, Wendy

Correspondence: I am writing to urge the National Park Service to discontinue the grazing of beef and dairy cattle at Point Reyes National Seashore. This precious area has been damaged by livestock grazing which poses a threat to the environment and local wildlife and it should be protected and used to serve the public good, and not for the benefit of the livestock industry.

I strongly oppose Option B and any other proposal that would be fatal to Tule Elk or other wildlife to the benefit of ranching operations, and encourage the agency to adopt Option F to discontinue grazing and allow members of the public to enjoy this beautiful park and to be enriched with opportunities to visit and appreciate this special place.

#6921

Name: Loomis, Keith

Correspondence: I oppose your plan to allow a native tute elk kill at Point Reyes National Park. in CA. Instead, please control the damage done by the subsidized grazing livestock.

#6922

Name: Bae, Lori

Correspondence: I am writing to urge the National Park Service to discontinue the grazing of beef and dairy cattle at Point Reyes National Seashore. This precious area has been damaged by livestock grazing which poses a threat to the environment and local wildlife and it should be protected and used to serve the public good, and not for the benefit of the livestock industry.

I strongly oppose Option B and any other proposal that would be fatal to Tule Elk or other wildlife to the benefit of ranching operations, and encourage the agency to adopt Option F to discontinue grazing and allow members of the public to enjoy this beautiful park and to be enriched with opportunities to visit and appreciate this special place.

#6923

Name: Palmer, Muir

Correspondence: Please do not kill the elk so there is more land for cattle ranchers. Seriously? Has the science & data not taught you anything? If you spend more of our taxpayer money to hand this beautiful seashore over to greedy butchers, we will make sure you are unemployed faster than you can flip a burger at McDonald's. Which may be where you are working next. Thank you.

#6924

Name: Goldstein, Sonya

Correspondence: Please don't wipe out the Tule Deer by separating them . Please Return them to their california home!

#6925

Name: N/A, N/A

Correspondence: • Point Reyes National Seashore is supposed to be managed under the Point Reyes Act for "maximum protection, restoration, and preservation of the natural environment." There's no mandate for prioritizing commercial agricultural leases on these public lands.

- Natural values, native wildlife, public access and enjoyment should take priority over commercial activities at Point Reyes.
- Tule elk are an important part of the landscape at Point Reyes. Their recovery is a result of successful native ecosystem restoration, which is a key element of the Park Service's mission. It's taken a lot of time, money and effort to restore tule elk to Point Reyes, the only national park where they live. Tule elk should be allowed to roam free and forage in the park - not shot, removed, fenced or treated as problem animals.
- Right now the Point Reyes ranches enjoy not only subsidized grazing fees and housing, but also taxpayer-funded infrastructure and road improvements, and publicly funded projects. But commercial activities at Point Reyes should be required to accommodate native wildlife - not the other way around.
- The Park Service shouldn't allow any new agricultural activities at Point Reyes. Planting artichokes or other row crops will attract birds. And introducing sheep, goats, pigs or chickens will attract native predators such as coyotes, bobcats and foxes. Expanded ranching would only create new wildlife conflicts.

- Cattle ranching should only be allowed if it's consistent with preserving the natural environment. And agricultural activities such as mowing shouldn't be allowed in park areas where they harm endangered species or wildlife habitat, impair water quality, cause excessive erosion or spread invasive plants/diseases.
- Cattle are the seashore's primary source of greenhouse gases. So the Park Service's preferred alternative is inconsistent with its own "Climate Friendly Parks" plan.

#6926

Name: N/A, N/A

Correspondence: California must protect its native species for our children

#6927

Name: SALLOWS, TRACY

Correspondence: The land belongs to the Tule Elk. Do not kill a Native Species to make room for an invading one. That never works out well.

#6928

Name: Nagel, Sarah

Correspondence: Animals should be protected!

#6929

Name: Glander, Bethani

Correspondence: I would like to write in favor of options A and E. If D allowed for a larger population of elk, option D would be my first choice. The elk at Point Reyes is one of its best features. Limiting or removing the herd would be very upsetting. I find it disappointing that option B is listed as the "preferred" option. The public visitors and wildlife should have priority over businesses. I would like to see a reduction of ranching to reduce environmental impacts and increase recreational opportunities. I would prefer removing ranching all together over expanding it, new visitor opportunities and nature in the park would be nice but the entire removal of ranching in option F would impact a lot more jobs and the authentic feel of the historical ranches which are also a nice feature of the area.

I hope you will decide against expanding ranching at Point Reyes to best maintain the beautiful habitat it has to offer.

Thank you

#6930

Name: Perry, Steven

Correspondence: As visitors to Point Reyes for over forty years, my wife and I are totally opposed to the killing of the tule elk at Point Reyes. First, Point Reyes National Seashore is supposed to be managed under the Point Reyes Act for "maximum protection, restoration, and preservation of the natural environment." There's no mandate for prioritizing commercial agricultural leases on these public lands. Simply put, the cows should have been removed decades ago. Next, natural values, native wildlife, public access and enjoyment should take priority over commercial activities at Point Reyes. It's a "national park" after all.



Tule elk are an important part of the landscape at Point Reyes. Their recovery is a result of successful native ecosystem restoration, which is a key element of the Park Service's mission. It's taken a lot of time, money and effort to restore tule elk to Point Reyes, the only national park where they live. Tule elk should be allowed to roam free and forage in the park - not shot, removed, fenced or treated as problem animals.

As you know, the Point Reyes ranches enjoy not only subsidized grazing fees and housing, but also taxpayer-funded infrastructure and road improvements, and publicly funded projects. But commercial activities at Point Reyes should be required to accommodate native wildlife - not the other way around. It's not supposed to be a bunch of cattle ranches with a few hiking trails here and there. Also, the Park Service shouldn't allow any new agricultural activities at Point Reyes. Planting artichokes or other row crops will attract birds. And introducing sheep, goats, pigs or chickens will attract native predators such as coyotes, bobcats and foxes. Expanded ranching would only create new wildlife conflicts.

If it has to stay, cattle ranching should only be allowed if it's consistent with preserving the natural environment. And agricultural activities such as mowing shouldn't be allowed in park areas where they harm endangered species or wildlife habitat, impair water quality, cause excessive erosion or spread invasive plants/diseases.

Lastly, cattle are the seashore's primary source of greenhouse gases. So the Park Service's preferred alternative is inconsistent with its own "Climate Friendly Parks" plan. The best solution is to close the ranches and leave the tule elk and other native animals and plants alone. Thanks for your time.

#6931

Name: Pray, Ken

Correspondence: I am writing to urge the National Park Service to discontinue the grazing of beef and dairy cattle at Point Reyes National Seashore. This precious area has been damaged by livestock grazing which poses a threat to the environment and local wildlife and it should be protected and used to serve the public good, and not for the benefit of the livestock industry.

I strongly oppose Option B and any other proposal that would be fatal to Tule Elk or other wildlife to the benefit of ranching operations, and encourage the agency to adopt Option F to discontinue grazing and allow members of the public to enjoy this beautiful park and to be enriched with opportunities to visit and appreciate this special place.

#6932

Name: Thompson, Meredith

Correspondence: To the National Park Service:

I respectfully ask that you no longer permit the grazing of beef and dairy cattle at Point Reyes National Seashore. Livestock have caused damage to this fragile and beloved area. Their grazing poses a threat to the environment and local wildlife. This cherished piece of our country should be protected and used to serve the public good, rather than exploited for commerce and short-term gain for one industry.

I strongly oppose Option B and any other proposal that would be fatal to Tule Elk or other wildlife to the benefit of ranching operations, and encourage the agency to adopt Option F to discontinue grazing and allow members of the public to enjoy this beautiful park and to be enriched with opportunities to visit and appreciate this special place.

#6933

Name: N/A, N/A

Correspondence: In Point Reyes National Seashore in Marin County, CA, over 5,000 cattle who are being

exploited for beef and dairy production are grazing in the public park, posing a threat to the environment, wildlife, and the public good.

The ranchers' leases are set to expire. Please do not to extend the leases. NPS proposals include killing the native Tule Elk in order to continue grazing livestock.

Please protect native wildlife in Point Reyes-like the Tule Elk-from being killed to promote cattle grazing. Thank you.

#6934

Name: Davis, Suzanna

Correspondence: Right now the Point Reyes ranches enjoy not only subsidized grazing fees and housing, but also taxpayer-funded infrastructure and road improvements, and publicly funded projects. But commercial activities at Point Reyes should be required to accommodate native wildlife - not the other way around.

Tule elk are an important part of the landscape at Point Reyes. Their recovery is a result of successful native ecosystem restoration, which is a key element of the Park Service's mission. It's taken a lot of time, money and effort to restore tule elk to Point Reyes, the only national park where they live. Tule elk should be allowed to roam free and forage in the park - not shot, removed, fenced or treated as problem animals.

Point Reyes National Seashore is supposed to be managed under the Point Reyes Act for "maximum protection, restoration, and preservation of the natural environment." There's no mandate for prioritizing commercial agricultural leases on these public lands.

Natural values, native wildlife, public access and enjoyment should take priority over commercial activities at Point Reyes.

#6935

Name: Osborne, Annie

Correspondence: All the ranching alternatives in the Draft Environmental Impact Statement involve the impairment of natural resources. Three National Park Service laws prohibit actions that will impair natural resources (the 1916 NPS Organic Act, Point Reyes National Seashore legislation Section 459c-6, and Golden Gate National Recreation Area legislation Section 460bb). Consequently, the Park Service should prepare a supplemental DEIS with ranching alternatives that comply with applicable laws requiring the protection of natural resources. The Park Service should then circulate that supplemental DEIS for public comment.

Thank you.

#6936

Name: Tremaine, Lisa

Correspondence: To whom it may concern:

**NO HUNTING ELK IN POINT REYES NATIONAL SEASHORE!!!**

- Point Reyes National Seashore is supposed to be managed under the Point Reyes Act for "maximum protection, restoration, and preservation of the natural environment." There's no mandate for prioritizing commercial agricultural leases on these public lands.

- Natural values, native wildlife, public access and enjoyment should take priority over commercial activities at Point Reyes.

- Tule elk are an important part of the landscape at Point Reyes. Their recovery is a result of successful native ecosystem restoration, which is a key element of the Park Service's mission. It's taken a lot of time, money and effort to restore tule elk to Point Reyes, the only national park where they live. Tule elk should be allowed to roam free and forage in the park - not shot, removed, fenced or treated as problem animals.
- Right now the Point Reyes ranches enjoy not only subsidized grazing fees and housing, but also taxpayer-funded infrastructure and road improvements, and publicly funded projects. But commercial activities at Point Reyes should be required to accommodate native wildlife - not the other way around.
- The Park Service shouldn't allow any new agricultural activities at Point Reyes. Planting artichokes or other row crops will attract birds. And introducing sheep, goats, pigs or chickens will attract native predators such as coyotes, bobcats and foxes. Expanded ranching would only create new wildlife conflicts.
- Cattle ranching should only be allowed if it's consistent with preserving the natural environment. And agricultural activities such as mowing shouldn't be allowed in park areas where they harm endangered species or wildlife habitat, impair water quality, cause excessive erosion or spread invasive plants/diseases.
- Cattle are the seashore's primary source of greenhouse gases. So the Park Service's preferred alternative is inconsistent with its own "Climate Friendly Parks" plan.

#6937

Name: Raines, Bob

Correspondence: The Shoreline Unified School District serves families living in the Point Reyes National Seashore, and has long before the establishment of the National Seashore. The families living on the historic ranches have a long history of participation in our schools. Any change to the General Management Plan that would lead to the elimination of the historic ranches would have a seriously detrimental impact on the District, limiting our ability to serve our students who live in other parts of our district.

#6938

Name: copeland, martha

Correspondence: NO bikes at PT Reyes Seashore. Unlike cars, they carry no insurance. I was hit by a speeding bicycle on a walking trail, who simply kept going. I am sure he saw me, and he saw that he hit me. I broke my shoulder. I am seventy. Walking trails need to be safe for walkers, and not allow speeding bicycles. They don't follow the rules, and they don't care about pedestrians, who bicyclists feel are in THEIR way. MY incident isn't isolated. Bikers feel it is their right to own walking paths. What about walkers?

#6939

Name: Rozanski , Ashley

Correspondence: PLEASE WAKE UP!! The preservation of native wild species must take precedence over farming and ranching activities. Remind it that grazing negatively affects ecosystems, causing water pollution and soil erosion, spreading invasive species and disease, and harming endangered species.

#6940

Name: Huang, Karissa

Correspondence: Please do NOT allow tule elk to be killed for the sake of dairy cows.

It is possibly understandable that a few privileged livestock owners are allowed permits for cattle-grazing, even though cattle-grazing can cause damage to wetlands, streams and wildlife habitats. Beyond that, it baffles the

mind as to why we would allow tule elk, an endangered species, to be shot in order so that a few livestock owners can graze their cows on public land.

Let's use some common sense here. Point Reyes National Seashore is public land with a diverse ecosystem. We should be protecting this natural ecosystem, NOT protecting the interests of ranchers who enjoy heavily subsidized cattle grazing and dairy leases.

#6941

Name: Wood, Christine

Correspondence: I respectfully ask that you consider the words of the Act written in 1962 to "save and preserve....a portion of the diminishing seashore..." Please do not allow ranchers to kill tule elk they believe 'interfere' with their ranchlands (ranchers were compensated for their lands 44 years ago). We have lost too many elk due to ranchers fencing during drought. Current proposals are 'anti environment' and ignore the Park's ecology. We do not need or want an additional 10,000 acres of grazing lands or row crops or permission to kill tule elk.

Please....our national parks should be a refuge for people and wildlife.

Thank you.

#6942

Name: Barto, Peter

Correspondence: Hello - I am a Marin County native, and I do not support the NPS Preferred Alternative, Alternative B, of the Draft EIS for the GMPA, as I believe it would have significant environmental consequences and impacts not addressed. I am hoping this draft plan will be considerably reassessed, with less draconian proposed mitigation measures. Thank you.

Peter Barto

#6943

Name: Williams , Melissa

Correspondence: I am writing regarding the fate of tule elk at Point Reyes National Seashore in California. I am asking you to reconsider a plan that would permit elk to be killed while allowing the expansion of agricultural activities. I am 100% against this. Please reconsider.

#6944

Name: ODonnell, Anne

Correspondence: Leave the parks and elk alone.

#6945

Name: Krämer, Markus

Correspondence: xx

#6946

Name: Braun, Christo

Correspondence: Please stop this expansion plan and preserve the existing Tule elk homeland of our National Park. Thank you

#6947

Name: Grainger, Dave

Correspondence: I write as a life-long park enthusiast, visitor to Pt. Reyes and user of many other public lands nation-wide, donor to the NP Foundation, and holder of many National Park annual passes. I strongly oppose the NPS General Management Plan Amendment (GMPA) proposed for Pt. Reyes National Seashore. I remain disappointed with the vision and stewardship of our National Parks and other public lands, and this is yet another example of succumbing to lobbyists, private interests and financial pressures.

In 1962, Congress established Point Reyes National Seashore in 1962 "to save and preserve, for the purposes of public recreation, benefit, and inspiration, a portion of the diminishing seashore of the United States that remains undeveloped." At the time and ever since, ranchers on that land were compensated fairly for their land under the clear agreement that they could remain in the park for their lifetime or 25 years. BUT they never left. How does this satisfy the clearly articulated mission statement for the Seashore? This is wrong, and disingenuous to public land stakeholders: the public. 25 years is clear - time to move private interests off of public lands per the NPS agreement.

Let's be honest: seashore management has consistently favored the ranches over wildlife. That remains unchanged in the NPS-proposed GMPA alternatives. Let's look at the GMPA language: continued ranching is proposed in five of these GMPA proposed alternatives (Alternatives A through E). Only one alternative, Alternative F, proposes to phase out ranching over five years as was intended under all original agreements in 1962. Alternative F it shall be.

And the NPS "preferred alternative" Alternative B provides ranchers exactly what they have long demanded - more 20-year leases to remain in their private enclave protected by public tax money. Moreover, NPS-claimed "diversification" clauses now allow previously unauthorized commercial livestock and crops that Seashore ranchers say they need for income. But, this is no longer their land to provide their own income any longer - it's public land, deeded back to the public and to the native species for the public's use per the NPS Seashore mission statements. Get the ranchers off. They are not the public. Since 1962 they were supposed to have 25 years. That is clearly over. Move them on.

Lastly, the proposed lethal removal of native elk that impede ranchers' ability to further their elite privileges on public lands is criminal.

Native Tule elk are in fact the true historic occupants of the Point Reyes peninsula. For 10's of thousands of years before cattle were imported from Europe to destroy their habitat. Thousands of elk were extirpated by the late 1800s as the coastal prairie was overtaken by imported cattle. The native elk's reintroduction to the Seashore in 1978, after a 100-year absence, is a rare success story of species' recovery.

In the NPS environmental impact statement, the NPS analyzes the Seashore's carrying capacity based on the maximum number of cattle the land can support based on historical conditions. It determines how many elk the park can support based on what forage is left over: only 120 elk. Wow. What a tragedy. And NPS endorses managing this tragedy again to the elk's demise? How is this justified?

Ranches and cattle grazing comprise one-third of the Seashore's 71,000 acres. Domestic cattle in the Seashore now outnumber Tule elk 10-1. And this will fall further under all Alternatives except Alternative F. In 2016, the NPS disclosed that 250 confined native elk had perished during the CA shoreline drought. These elk were unethically fenced off from pasture and water the NPS leases for cattle grazing. The majority of the elk remain confined at Tomales Point. It is a small "free-roaming" herd near Drakes Bay that the ranchers want removed. Get the ranchers off of Seashore public lands per the 1962 original understanding. They have received their subsidy -

compensating tax money on the dole - for decades beyond the original exit deadline. No more. Seashore is seashore public area - let's move to re-establish the intent from 1962 as undeveloped public lands.

Only Alternative F is the NPS choice that retains this public lands value and vision.

Dave Grainger Concerned tax payor, outdoors person and NPS enthusiast

#6948

Name: Krasnow , Mark

Correspondence: Please protect the native animals that live in this park over and beyond introduced for-profit species like cattle

#6949

Name: Miller, Jeff

Correspondence: Submitted to <https://parkplanning.nps.gov> and sent via certified mail on 9/23/19

September 23, 2019

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

Re: Comments on DEIS for a General Management Plan Amendment

Dear Superintendent Muldoon:

The Center for Biological Diversity submits these comments on the National Park Service (NPS) Draft Environmental Impact Statement (DEIS) for development of a General Management Plan Amendment (GMPA), for the areas of Point Reyes National Seashore (PRNS) and Golden Gate National Recreation Area (GGNRA) currently managed for beef and dairy cattle ranching.

Introduction

The Center is a nonprofit conservation organization with more than 1.6 million members and supporters, dedicated to the protection of native species and their habitats through science, policy, and environmental law. The Center has expertise on protection of endangered species, cattle ranching impacts on the environment, management of federal public lands, and implementation of federal environmental protection laws. The Center has been working to protect native wildlife and other environmental resources of the Bay Area for more than two decades. We have more than 3,800 members and supporters who reside in Marin County.

Many Center members, supporters, and staff have a long standing interest in preserving endangered species, tule elk and other native wildlife, and natural ecosystems of Point Reyes National Seashore and the GGNRA. Center staff in the Bay Area have been visiting PRNS for up to 50 years, and have been involved in tule elk reintroduction, salmon restoration, and endangered species protection efforts in PRNS and the GGNRA over the past two decades. Center staff and members have spent hundreds of hours in the PRNS and the GGNRA ranching areas observing wildlife and documenting the conditions of ranchlands.

The Center submitted formal comments during the NPS Comprehensive Ranch Management Plan process in 2014. We are one of the conservation organizations which filed suit against the NPS in 2016 for failing to update

the GMP or conduct a NEPA process before attempting to extend cattle grazing leases, which led to the current planning process and the current GMPA and DEIS. The Center submitted formal scoping comments on this GMPA on 11/14/17 and 11/19/18.

We have read the draft Foundation Statement, DEIS, 2019 Natural Resources Condition Assessment, 2018 Grazing Plan, 2013 Coastal Watershed Assessment, 2006 NPS Management Policies, 2004 NMFS Biological Opinion, 2002 USFWS Biological Opinion, 1998 Elk Plan, 1990 Range Management Guidelines, and numerous other documents and data applicable to the DEIS, the GMPA and the current ranching area, many of which we obtained from the NPS under a Freedom of Information Act Request.

Center for Biological Diversity contact:

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Oakland, CA 94612

[jmiller@biologicaldiversity.org](mailto:jmiller@biologicaldiversity.org)

### Summary of Major Comments

It is appalling that the Park Service, whose charge is to preserve unimpaired the natural resources of the national park system, is proposing to adopt a GMP alternative which would treat native tule elk at Point Reyes National Seashore, the only national park where they occur, as problem animals to be killed or hazed. It is equally disturbing that the Park Service would authorize additional agricultural uses to be introduced into PRNS and GGNRA, which are sure to cause further conflicts between ranching operations and native wildlife. The NPS preferred alternative would enshrine long-term private cattle ranching as the primary use of a huge swath of PRNS and GGNRA, to the detriment of native wildlife and natural habitats. The preferred alternative would do very little to prevent harm to endangered species and other native wildlife, degradation of water quality, soil erosion, and spread of invasive species from cattle grazing and ranching activities.

The DEIS makes it clear that significant impairment of natural resources from cattle grazing and ranching activities would continue over a significant portion of PRNS and GGNRA under alternatives A-E. Damage and harm to soils, water resources, vegetation, wildlife, tule elk, and endangered and sensitive species would continue. The mitigation measures proposed under alternative B are inadequate to offset the negative impacts from livestock grazing and ranching activities.

NPS preferred alternative B does not comply with the Organic Act, the Point Reyes Act, or the GGNRA enabling legislation, as it authorizes and promotes significant impairment of natural resources and killing of native wildlife. Alternative B is not consistent with the maximum protection, restoration, and preservation of the natural environment, the charge of the NPS in managing PRNS and GGNRA. The preferred alternative - expanded cattle ranching, introducing other agricultural and economic activities, and shooting elk - is inconsistent with the PRNS purpose, significance, fundamental resources and values, as outlined in the parks draft foundational document. Alternative B is an illegal giveaway of access and use of public land to private commercial interests and inappropriately allows commercial leaseholders to dictate persecution of native wildlife on our public parklands.

Alternatives A, C, D, and E would also continue to prioritize ranching over other park purposes, such as preserving wildlife and the parks natural values. None of alternatives A-E would restore natural resources that have been degraded by decades of continuous cattle grazing.

Only alternative F would conserve the natural history of PRNS and GGNRA and provide the maximum protection, restoration, and preservation of the natural environment. F is the only alternative that complies with the Organic Act, Point Reyes Act, and GGNRA enabling legislation. Only alternative F would manage PRNS and GGNRA in the public interest.

### Public Comment Process

The NPS has stated that they will not accept public comments by fax, email, or in any way other than through the NPS comment portal website or by hard copy of comments which are mailed or hand delivered. So-called bulk comments in any format submitted on behalf of others will not be accepted. These rules seem explicitly designed to prevent public interest conservation groups from generating thousands of comments from their members through action alerts, as happened during scoping comments on the GMPA. These rules limit public participation. More public participation should be a goal of the NEPA process for this controversial management plan on public lands.

#### Applicable NPS Resource Protection Laws and Policies

PRNS and GGNRA are units of the national park system and, as such, must be managed primarily to protect the natural resources of the parks. Three federal natural resource protection laws apply - the NPS Organic Act, the Point Reyes Act, and the GGNRA enabling legislation.

#### The NPS Organic Act

The 1916 Organic Act applies to all units of the national park system, including PRNS and GGNRA, and requires:

The Secretary shall promote and regulate the use of the National Park System by means and measures that conform to the fundamental purpose of the System units, which purpose is to conserve the scenery, natural and historic objects, and wild life in the System units and to provide for the enjoyment of the scenery, natural and historic objects, and wild life in such manner and by such means as will leave them unimpaired for the enjoyment of future generations (54 U.S.C. 100101(a), emphasis added).

The NPS has a narrow mandate to conserve the scenery and the natural and historic objects and the 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. The 9th Circuit Court of Appeals has held that this language means 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).

While Congress has given NPS management discretion to allow impacts within parks, that discretion is limited by the statutory requirement (generally enforceable by the federal courts) that NPS must leave park resources and natural values unimpaired - unless a particular law directly and specifically provides otherwise. The Organic Act provides that the Secretary of the Interior may, under such rules and regulations and on such terms as he may prescribe, grant the privilege to graze livestock within any national park, monument, or reservation herein referred to when in his judgment such use is not detrimental to the primary purpose for which such park, monument, or reservation was created (emphasis added).

#### The Point Reyes Act (1962)

The Point Reyes Act requires, in pertinent part:

459c-6. Administration of property (a) Protection, restoration, and preservation of natural environment: Except as otherwise provided in sections 459c to 459c-7 the property shall be administered by the Secretary without impairment of its natural values, in a manner which provides for such recreational, educational, historic preservation, interpretation, and scientific research opportunities as are consistent with the maximum protection, restoration, and preservation of the natural environment within the area (16 U.S.C. 459c-6, emphasis added).

The Point Reyes Act plainly states that NPS is required to manage PRNS in such a way as to not cause impairment of natural values. Other uses of national parks, such as recreational, educational, historic preservation, interpretation, and scientific research opportunities are allowable only to the extent that they are consistent with the maximum protection, restoration, and preservation of the natural environment within the area. Thus livestock grazing can be authorized in PRNS only if it can be shown that it is consistent with the maximum protection,



restoration, and preservation of the natural environment. The DEIS makes it clear that the NPS preferred alternative would significantly impair natural values and would not be consistent with the purposes of these park units.

### GGNRA Enabling Legislation

The GGNRA enabling legislation (1972, 1988) provides, in pertinent part:

460bb - Establishment: In the management of the recreation area, the Secretary shall utilize the resources in a manner which will provide for recreation and educational opportunities consistent with sound principles of land use planning and management. In carrying out the provisions of this subchapter, the Secretary shall preserve the recreation area, as far as possible, in its natural setting, and protect it from development and uses which would destroy the scenic beauty and natural character of the area (16 U.S.C. 460bb, emphasis added).

The DEIS (p. 3) misrepresents the 1978 Congressional amendments for PRNS and GGNRA providing standardized language for the leasing of land for agricultural purposes (16 United States Code [U.S.C.] 459c-5(a) and (b) and 460bb-2(j)), stating:

These amendments allow NPS to lease agricultural lands subject to any restrictive covenants deemed necessary and directed NPS to first offer such leases to the person who owned or leased the land prior to its acquisition by the United States. NPS uses these statutory authorities to issue agricultural lease/special use permits (lease/permits) for ongoing traditional ranching and dairying operations when a ranchers reserved right expires.

What the 1978 legislation actually says:

SEC 318: Act is amended to read as follows: SEC. 5. (a) The owner of improved property or of agricultural property on the date of its acquisition by the Secretary under this Act may, as a condition of such acquisition, retain for himself and his or her heirs and assigns a right of use and occupancy for a definite term of not more than twenty-five years, or, in lieu thereof, for a term ending at the death of the owner or the death of his or her spouse, whichever is later.

Ranchers resisted the creation of PRNS but ultimately accepted more than \$57 million (more than \$380 million in 2019 dollars) for their land, and were permitted to continue to ranch at PRNS for 25 years or the death of the previous landowner, whichever came first. As these agreements began to expire, NPS gave ranchers the option to continue to lease park lands at the discretion of the Secretary of the Interior. Neither the Point Reyes Act nor the GGNRA enabling legislation states or implies permanence for the ranches, yet ranchers maintain and NPS and the DEIS suggest that Congress meant ranching to continue at PRNS in perpetuity.

### NPS Management Policies

NPS Management Policies (2006) require the planning process to begin with the development of a foundation statement that is based on the parks enabling legislation or presidential proclamation and that documents the parks purpose, significance, fundamental resources and values, and primary interpretive themes. The foundation statement also includes any relevant laws and executive orders that apply to the national park system or to the individual park unit. However, the Organic Act and the Point Reyes Act are not even mentioned in the NPS 2019 draft Foundation Statement.

NPS Management Policies (2006, p. 2) summarizes the underlying management principles for park units, including: preventing impairment of park resources and values; and passing on to future generations natural, cultural, and physical resources that meet desired conditions better than they do today, along with improved opportunities for enjoyment. This mandate to manage human activities so as to not impair natural resource values was restated in the "Redwood Amendment" to the Organic Act in 1978, and actually requires a GMP for the parks that improve these resources.

## NPS Limited Authority to Permit Livestock Ranching

Under the Organic Act, NPS is allowed to grant the privilege to graze livestock within a park unit, such as PRNS and GGNRA, but only when such use is not detrimental to the primary purpose for which that park was created. 54 U.S.C. 102101(a)(2) (previous version at 16 U.S.C. 3). Utilizing this authority, NPS issued regulations in 1983 that actually prohibit livestock grazing for agricultural purposes within park units, unless: a) specifically authorized by federal statute; b) required under a reservation of rights; or c) designated as a necessary and integral part of a recreational activity or as required to maintain a historic scene. 36 C.F.R. 2.60(a). Grazing allowed under one of those three exceptions must be authorized pursuant to the terms and conditions of a license, permit or lease. *Id.* at 2.60(b). In 1978, Congress provided the Secretary with the discretion to lease land at PRNS that was agricultural prior to acquisition by NPS. 16 U.S.C. 459c-5(a). However, such leases were to be subject to such restrictive covenants as may be necessary to carry out the purposes of the Act.

NPS Management Policies declare that the agency will phase out the commercial grazing of livestock whenever possible. 2006 NPS Management Policies 4.4.4.1. These policies explain that the agency will only allow commercial livestock grazing where it does not cause unacceptable impacts on park resources and values. *Id.* at 8.6.8.2. Further, each park unit must address this use in an appropriate planning document, must use best management practices to protect resources and regulate livestock so that ecosystems and animals are not significantly altered or threatened, and must implement a comprehensive monitoring program and adaptive management practices. *Id.* at 8.6.8.2. NPS is not allowed to expend funds to construct or maintain livestock structures unless there is a direct benefit to the protection of park resources. *Id.* at 8.6.8.2.2. NPS has issued regulations that govern when the superintendent of a park unit may issue a permit to authorize an otherwise prohibited or restricted activity or impose a public use limit, such as livestock grazing. 36 C.F.R. 1.6(a) (1983). An activity authorized by such a permit shall be based upon a determination that public health and safety, environmental or scenic values, natural or cultural resources, scientific research, implementation of management responsibilities, proper allocation and use of facilities, or the avoidance of conflict among visitor use activities will not be adversely impacted. *Id.* at (b).

The sum of all these regulations is that the NPS mandate for PRNS and GGNRA is to phase out the commercial grazing of livestock wherever possible, and that livestock grazing may only be authorized (through a lease, permit, or license) if grazing will allow for the conservation of, and not impair, the parks resources or values and the public's opportunities to use and enjoy them.

The current DEIS utterly fails to apply these laws, NPS policies and the NPS mandate for management to the proposed actions and alternatives in the GMPA. In fact, the DEIS dismisses the concept of management of all park lands for the protection, restoration, and preservation of natural resources as an infeasible alternative, one considered but dismissed from further analysis. Maximum protection of natural resources is not an alternative - it is the required legal and policy framework for the entire GMPA. The DEIS also sets up a false conflict between protecting, restoring and preserving natural resources with managing cultural resources and providing for visitor use and enjoyment. These are not in conflict - they are all required and mandated under the above federal laws and NPS policies.

## NEPA Requirements

NEPA requires the NPS to identify the environmentally superior alternative, which NPS should have done in the DEIS. NPS must identify the alternative that causes the least damage to the biological and physical environment, and that best protects, preserves and enhances historic, cultural and natural resources.

NEPA requires that the NPS make a finding of significance regarding environmental impacts if a project or action has potential for controversy on environmental grounds, has potential adverse effects on an endangered or threatened species or its habitat or on a critical habitat, or has potential for violation of a federal, state, or local law or requirement imposed for the protection of the environment. The DEIS makes it clear that the preferred alternative meets all these thresholds and that the preferred alternative will require mitigations to reduce these impacts to less than significant levels.

Any mitigations which NPS relies on to reduce significant impacts must be explicitly identified in the EIS. The NPS must demonstrate that it will have sufficient resources and funding to implement or ensure performance of mitigations, and sufficient monitoring to ensure mitigations are actually implemented and are effective.

#### Failure to Address Issues Raised During Scoping

The Center submitted formal scoping comments on this GMPA on 11/14/17 and 11/19/18. The DEIS fails to address or evaluate numerous issues that we identified in scoping as potentially significant impacts from authorizing cattle ranching, allowing expanded agricultural activities, and killing and persecuting elk.

Our scoping comments asked NPS to evaluate the potential for conflicts with native wildlife due to agricultural diversification, and explain how the NPS and ranchers would address those conflicts. The DEIS fails to address this issue.

Our scoping comments asked NPS to fully evaluate the impacts of manure management (spreading liquid sewage from dairies on pasture areas), including the potential for transmission of livestock diseases to native wildlife. The DEIS fails to address this issue.

Our scoping comments asked NPS to evaluate the potential for rebuilding large tule elk herds at PRNS and the benefits such herds could provide for the genetic diversity and long term persistence of tule elk as a species. The DEIS fails to address this issue.

Our scoping comments asked NPS to evaluate the impacts of fencing on elk herd health, including: why the fenced elk herd in the Tomales Point Elk Preserve declined 47% during the drought years from 2012-2014, while the free-roaming elk herds at Limantour and Drakes Beach increased by 28% and 39%, respectively, during the same period; and the consequences of fencing elk rather than allowing them to move freely to find water and food during drought years. The DEIS fails to address these issues.

Our scoping comments asked NPS to assess ranch leaseholder claims about elk impacts to ranches that are the basis for lethally managing and hazing elk, including: specious claims of damage to equipment and infrastructure; unsubstantiated economic impacts from elk; to what extent elk actually compete with livestock for forage; and unverified claims of elk killing cattle. The DEIS fails to address these issues.

Our scoping comments asked NPS to disclose the past annual expenditure of taxpayer dollars from NPS employees moving and hazing elk from the ranch lease areas; and to predict annual costs for each elk management strategy in each DEIS alternative. The DEIS fails to address these issues.

Our scoping comments asked NPS to inform the public about management actions NPS has implemented in ranching areas to address damage to salmonid habitat in PRNS and GGNRA from livestock grazing and ranching activities, and compliance with the 2004 NMFS Biological Opinion for salmonids. These issues included riparian buffers, habitat and riparian monitoring, sediment and water pollution and temperature thresholds, impacts to stream channels and riparian vegetation, and erosion. The DEIS fails to fully address these issues.

Our scoping comments asked NPS to inform the public about management actions NPS has implemented in ranching areas to address water quality impairment from livestock grazing and ranching activities. Among other issues, we asked that the EIS address San Francisco Bay Regional Water Quality Control Board concerns about whether PRNS and GGNRA ranching operations are in compliance with federal and state regulations, including waste discharge requirements issued by the Water Board. The DEIS fails to fully address these issues.

Our scoping comments asked NPS to answer questions about the adequacy of forage availability, allocation, and RDM standards which result in overgrazing. We specifically requested that the EIS rely on accurate and updated information to calculate soil surveys, grassland productivity, AUMs, and forage availability. NPS and the DEIS overestimate available forage at PRNS, based on overly optimistic and outdated soil productivity data, animal unit calculations based on inaccurate average cattle weight, and an assumption that 100% of the forage above the

required minimum RDM is allocated to cattle. The DEIS fails to address these issues or to use best available science.

Our scoping comments asked NPS to disclose to the public ongoing monitoring and enforcement problems with PRNS grazing leases, specifically instances of grazing lease violations, how the NPS ensures compliance with lease conditions, and whether the NPS has ever taken any enforcement action for grazing lease violations. The DEIS fails to disclose or discuss these issues.

Our scoping comments asked NPS to compare the economics of private grazing leases in the park with the economy generated by recreation, per the 2006 NPS Economic Impacts Study. We asked the NPS to disclose the full economic costs of grazing leases, including subsidies, below-market lease rates, ranch improvements, maintenance, mitigations, and monitoring, compliance and enforcement. The DEIS fails to disclose this information.

### Purpose and Need for Action

The DEIS states that the purpose of the EIS is to establish guidance for the preservation of natural and cultural resources and the management of infrastructure and visitor use in the planning area. It further states that the GMP articulates desired conditions for natural and cultural resource conditions and visitor experiences.

The purpose of the GMP and EIS is not to provide financial assistance or economic benefits to private ranch leaseholders. Profitability or commercial sustainability of ranching activities is neither a legitimate nor legal NPS management goal. Yet the DEIS makes it clear that the NPS is considering conferring economic benefits to ranchers as part of the basis for its management decisions and GMPA plans in the DEIS, including allowing new agricultural uses in the ranchland zone based on economic considerations for private businesses. The DEIS promotes agricultural diversification because it "allows ranchers to react to poor forage production years and fluctuations in the economic market" (DEIS, p. 20), permits ranchers to continue viable agricultural operations" (DEIS, p. 11), could provide a possible economic buffer for ranchers (DEIS, p. 181), accrue additional economic benefits for ranchers (DEIS, p. 181), and provide for ranchers financial security (DEIS, p. 181). None of these are valid or appropriate goals for NPS to consider as part of the GMPA.

### Planning History

The DEIS omits some of the planning history for these parks. The DEIS fails to mention an aborted attempt to update the 1980 GMP for PRNS and GGNRA during the 1990s through 2009. The NPS has long acknowledged that an updated GMP and full environmental study were needed to address ranching issues, among other changing conditions and issues, since the 1980 GMP for PRNS and GGNRA. Three times in the late 1990s, NPS published notices that a new GMP and EIS were required for PRNS and GGNRA, to provide strategies for addressing major issues and guide management of park lands over the subsequent 10-15 years (65 Fed. Reg. 5365-66, Feb. 3, 2000). During the next 8 years, NPS accepted public comments, held numerous public workshops, and prepared or commissioned 14 reports and assessments for the new GMP/EIS. In a 2003 newsletter, NPS announced five alternative management concepts for the long-term management of PRNS, three of which contemplated phasing-out or reducing commercial cattle ranching to protect natural resources. The NPS quietly abandoned the GMP/EIS in 2008-09, without any public explanation. In 2008, NPS announced it would release the draft GMP/EIS in fall/winter 2008, to be finalized in 2009. But then, without any further word or explanation, the new GMP/EIS was discontinued. The reasons why are unclear - but it is likely that political pressure by ranchers was the cause, concerned that a full analysis of ranching impacts would expose the fact that ranching is not compatible with the NPS non-impairment and maximum protection duties. The EIS must disclose why this GMP planning process was abandoned.

### Alternatives

With regards to cattle grazing and ranching activities, alternatives A, B, C, D, and E would continue extensive cattle grazing and ranching on significant portions of PRNS and GGNRA (19,000- 28,700 acres). Only alternative

F would remove all significant negative environmental impacts from livestock grazing and ranching, by ending commercial grazing leases and only employing a minimal amount of prescribed seasonal cattle grazing (100 to 200 AUM or less) to meet resource management goals.

With regards to treatment of tule elk, alternative C would kill the entire Drakes Beach elk herd and prevent new elk herds from establishing in the planning area; alternatives B and D would continue to persecute elk and allow for some lethal removal and continued hazing; alternatives A and E would take no action to limit the population growth or geographic extent of free-range elk in PRNS, but would allow hazing and limited take of elk. Only alternative F would allow free-range elk populations to expand across the planning area at PRNS without hazing or lethal removal, and remove the elk fence at Tomales Point; NPS management of elk would occur only to support other resource protection needs and management goals.

Only alternative F would comply with the Organic Act, Point Reyes Act, and GGNRA enabling legislation.

#### Alternative A - No Action

Under alternative A, 21,200 acres in PORE and GGNRA would continue to be used for dairy and beef cattle ranching. This alternative would also allow ranching on 7,600 additional acres not currently authorized for grazing. It would issue new 5-10 year leases on 27,000 acres. It would provide new appraisals to pay fair market value for grazing leases and leases would include "updated provisions to reflect current operations and regulatory requirements."

NPS would not alter or limit the population level or geographic extent of elk in PRNS, but would continue hazing elk off of ranch areas, as well as using habitat enhancements and fence repairs to attempt to keep elk off of ranches. NPS could haze, capture and relocate, or kill individual elk that become overly habituated to cattle feed, are repeatedly aggressive toward cattle, or pose a safety risk to ranchers or the public. NPS would continue testing elk for Johnes disease and chronic wasting disease - it is not clear whether this would include lethal testing of elk.

#### Alternative B - NPS Preferred Alternative

Under alternative B, 28,700 acres in PORE and GGNRA would continue to be used for dairy and beef cattle ranching, including 7,600 acres not currently authorized for grazing. Ranchers would get 20 year grazing leases. Stocking levels of beef and dairy cattle would be similar to current levels that cause overgrazed conditions - Animal Units would be authorized to meet 1,200 pounds per acre RDM standard. NPS would create a new management zone, the Ranchland Zone, and attempt to protect resources through sub-zoning on each ranch. The sub-zones would include: a Resource Protection Zone where no grazing would be allowed due to presence of sensitive resources, including rare plants, wetlands, riparian/stream/pond habitats, forested areas, critical habitat for threatened and endangered species, or slopes >20% slopes; a Range Zone where cattle and other livestock grazing would allowed, and intensive activities, vegetation management, or diversification would not be allowed; a Pasture Zone, where there are identified no sensitive resources, and vegetation management, forage production (including seeding and mowing), and some diversification activities would be allowed; and a Ranch Core Zone near the developed ranch complexes, which would allow diversification (small-scale, on-site processing of ranch products, row crops and other uses) and building new infrastructure.

Each ranch lease/permit would include a Ranch Operating Agreement to identify types of ranching and diversification activities allowed, maintenance requirements, and mitigation measures. NPS would adopt new management strategies to achieve desired conditions related to the preservation of resources. The NPS claims it would "identify authorized ranching activities and monitor and enforce rancher compliance with permit requirements," something that has never been done by NPS.

Alternative B would allow upland and riparian vegetation management such as mowing, brush removal, and use of IPM. Spreading of waste manure on pasturelands would continue to be allowed.

Alternative B would allow agricultural diversification in the Ranch Core subzone (raising livestock species such as

pigs, chickens, sheep, and goats; horse boarding; planting up to 2.5 acres of row crops; commercial enterprises such as farm stays and ranch tours; and small scale processing of dairy products. Livestock species such as sheep, goats, and chickens could also be raised in the Pasture subzone. The DEIS lists required mitigation measures specific to each diversification activity in appendix D.

Alternative B would set new rules for succession of ranching leases/permits, which appear to violate the Point Reyes Act: in the event an existing rancher decides to discontinue ranching, NPS would implement succession planning that is consistent with maintaining multi-generational ranching in the planning area.

Under alternative B, rather than individual grazing lease appraisals, NPS anticipates development of a master appraisal process managed by the US Department of the Interior to determine fair market value for park ranch operations.

With regards to treatment of tule elk, under alternative B both the Drakes and Limantour elk herds would be managed primarily in consideration of commercial ranch operations, and no new elk herds would be allowed to establish in the planning area. It would set an arbitrary maximum elk population threshold for the Drakes Beach herd of 120 animals. This threshold is not based on ecology or carrying capacity or managing for natural values. The DEIS claims it is "based on estimated forage consumption by elk, forage productivity on ranches, and time that elk spend on ranches, as well as NPSs capacity to manage elk. It is actually based on accommodating private ranchers, not forage consumption or carrying capacity. NPS would limit the Drakes Beach elk herd through lethal removal of an anticipated 10 to 15 elk annually, and would also use relocation, if feasible. Elk from the Limantour herd would be allowed to wander outside a core area if they did not establish new herds, and they would be monitored closely and managed in consideration of ranch operations. This is a euphemism for hazing and lethal removal of Limantour elk to manage their geographic extent if individual elk established outside the ecologically arbitrary core use areas. Population reduction efforts could target male elk outside the core area if conflicts with ranching operations arise.

#### Alternative C - Eradicate the Drakes Beach Elk Herd

This alternative would be substantially the same as alternative B for ranching operations, except the entire Drakes Beach elk herd would be removed by killing them. The Limantour elk herd would be managed in consideration of ranch operations. No new elk herds would be allowed to establish in the planning area.

#### Alternative D - Reduced Ranching

Alternative D would be substantially the same as alternative B, except that ranching would be slightly reduced by phasing out grazing-only leases and ranches that have minimal infrastructure over a one-year period. Grazing operations in areas that are outside the two historic districts would also be removed. This would leave 19,000 acres in active ranching, to be managed as described in alternative B. Elk management would be similar to alternative B.

#### Alternative E - No Dairy Ranching

Under Alternative E, the six active dairy ranches in the planning area would cease operations, but could convert to beef ranching. 26,100 acres in the planning area would be available for beef ranching. There would be no new agricultural diversification activities allowed. Beef cattle operations would be managed as described in alternative B. NPS would take no action to limit the population growth or geographic extent of free-range elk in PRNS. NPS management of elk would occur only to support other resource protection needs and management goals.

#### Alternative F - No Ranching

Under alternative F all commercial ranching operations would be discontinued. Ranch leases would be phased out over a five-year period, except for the two life estates which would be discontinued after they end. NPS could use limited prescribed seasonal grazing of cattle on lands in the planning area to meet resource management goals

and objectives, such as maintenance of disturbance regimes in grasslands and maintenance of habitats for some special status species. Such grazing would be on the order of 100 to 200 AUM or less in the planning area and limited to spring through fall, to avoid the wet season.

Visitor opportunities and access would be dramatically expanded. A Historic Ranch Preservation subzone would be created and managed for the adaptive reuse of ranch complexes, such as car-camping campground, larger trailhead, and other visitor facilities.

NPS management of elk would occur only to support other resource protection needs and management goals. Until cessation of ranching operations, NPS would consider limited, non-lethal management measures for elk. Once ranching operations ceased, development of new elk herds would be allowed to establish in Point Reyes. Following the cessation of ranching operations, the elk fence at Tomales Point would be removed. Free-range elk populations could expand across the planning area. Elk would not be allowed to expand into GGNRA or beyond PORE boundaries. The free-range elk herds at Drakes Beach and Limantour could potentially expand to 2,000 individuals over a 20-year period. The herd size would not be expected to grow to a level that would necessitate population management related to adequate forage in Point Reyes.

#### Alternatives Not Considered

Other conservation organizations proposed alternatives during scoping, including: a coastal prairie restoration alternative, which would maximize restoration of coastal prairie and other native plant and animal communities across the park unit; and a recreation alternative, which would maximize public access for wildlife viewing, photography, birdwatching, educational programs and hiking. The DEIS improperly omits any analysis of these alternatives. Feasible elements of these restoration and public access alternatives should be included in the chosen alternative.

#### Affected Environment and Environmental Consequences

The Affected Environment section of the DEIS lacks adequate baseline data to be able to adequately review and evaluate the impacts of cattle grazing and ranching activities under of all the alternatives. Under Public Law 113-287, enacted in 2014, the NPS is required to inventory and monitor park unit resources to establish baseline conditions - in order to assist in just such management decisions as the current GMPA:

#### Subchapter I-System Resource Inventory and Management

100701. Protection, interpretation, and research in System: Recognizing the ever increasing societal pressures being placed upon Americas unique natural and cultural resources contained in the System, the Secretary shall continually improve the ability of the Service to provide state-of-the-art management, protection, and interpretation of, and research on, the resources of the System.

100702. Research mandate: The Secretary shall ensure that management of System units is enhanced by the availability and utilization of a broad program of the highest quality science and information.

100703. Cooperative study units: The Secretary shall enter into cooperative agreements with colleges and universities, including land grant schools, in partnership with other Federal and State agencies, to establish cooperative study units to conduct multi-disciplinary research and develop integrated information products on the resources of the System, or the larger region of which System units are a part.

100704. Inventory and monitoring program: The Secretary shall undertake a program of inventory and monitoring of System resources to establish baseline information and to provide information on the long-term trends in condition of System resources. The monitoring program shall be developed in cooperation with other Federal monitoring and information collection efforts to ensure a cost-effective approach.

100705. Availability of System units for scientific study: (a) IN GENERAL.-The Secretary may solicit, receive, and consider requests from Federal or non-Federal public or private agencies, organizations, individuals, or other entities for the use of any System unit for purposes of scientific study.

(b) CRITERIA.-A request for use of a System unit under subsection (a) may be approved only if the Secretary determines that the proposed study-

(1) is consistent with applicable laws and Service management policies; and

(2) will be conducted in a manner that poses no threat to the System unit resources or public enjoyment derived from System unit resources.

(c) FEE WAIVER.-The Secretary may waive any System unit admission or recreational use fee in order to facilitate the conduct of scientific study under this section.

(d) BENEFIT-SHARING ARRANGEMENTS.-The Secretary may negotiate for and enter into equitable, efficient benefit-sharing arrangements with the research community and private industry.

100706. Integration of study results into management decisions: The Secretary shall take such measures as are necessary to ensure the full and proper utilization of the results of scientific study for System unit management decisions. In each case in which an action undertaken by the Service may cause a significant adverse effect on a System unit resource, the administrative record shall reflect the manner in which System unit resource studies have been considered. The trend in the condition of resources of the System shall be a significant factor in the annual performance evaluation of each superintendent of a System unit.

54 U.S.C. 100701 - 100706. (Emphasis added.)

Despite years of significant public comments and requests by multiple public interest organizations that research and monitoring be conducted on the environmental impacts of livestock grazing and ranching activities in these parks, NPS has failed to provide adequate baseline information and information on trends in the conditions of natural resources.

## Soils

The DEIS does not discuss the extensive soil erosion and soil compaction problems that currently exist in the planning area due to cattle grazing. It does mention grazing impacts on stream incision, but does not discuss the full extent of stream incision problems in PORE and GGNRA.

The DEIS acknowledges that Alternative B would have long-term, adverse impacts on soils from livestock trailing, trampling, erosion, and compaction; and also from ranching activities such as diversification, vegetation management, forage production, and manure spreading. Alternatives A, C, D, and E would have similar significant negative impacts to soils.

The Resource Protection sub-zoning would only protect an additional 5% of soils with high erosion potential and 3% of soils with high compaction potential from grazing impacts. The DEIS claims that management activity standards and mitigation measures are "expected" to reduce overall impacts on soils, but does not clarify whether they would reduce impacts to less than significant levels.

Only Alternative F would have noticeable, long-term benefits on soil resources: decrease in erosion rates and runoff, soil stabilization, and decreased soil compaction. Soil erosion, runoff, nutrient levels and compaction would return to natural conditions, and it would be more conducive to establishment of native vegetation communities.

## Water Resources

The DEIS acknowledges the severe impacts to surface water quality in the planning area from livestock grazing and dairy operations in the planning area, and that the main sources of water quality degradation in the planning



area are potentially pathogenic bacteria and nutrient loading from nonpoint sources associated with ranches and dairies. The DEIS discusses impairment of the Tomales Bay watershed, Lagunitas Creek and Olema Creek for nutrients, pathogens, and sediment/silt, exceedances of TMDL for potentially pathogenic bacteria, and elevated nutrient, suspended solids, and turbidity levels; and acknowledges these pollutants are in part due to grazing. The DEIS discusses the high concentrations of total suspended solids and nutrients flowing into Drakes Bay and Drakes Estero from ranches. The DEIS notes that in Abbotts Lagoon and the Kehoe drainage that tributaries draining dairy operations or dairy grazing land have the highest nutrient levels or loading rates, and significant problems with excessive nutrients, sediment, and potentially pathogenic bacteria. The DEIS discusses impacts on water quantity due to the huge volumes of water used for livestock, conservatively estimated at 50 to 124 million gallons per year.

The DEIS acknowledges that Alternative B would have significant adverse impacts on water resources due to continued pollutant loading (manure, bacteria, pathogens, nutrients, sediment/turbidity), changes in nutrient levels, disturbance to surface waters, releases of other agricultural and mechanical pollutants, increased soil erosion, and excessive use of water. Alternatives A, C, D, and E would have similar significant impacts to water resources. Alternative E, with the phase-out of dairy ranches, would reduce water usage and have more improvement to water quality and quantity.

Exclusion areas which could somewhat improve water quality would only increase by 1,200 acres. The DEIS claims that the Resource Protection sub-zoning, exclusion fencing, management activity standards and mitigation measures would "minimize" ranching impacts on water quality or quantity.

Only Alternative F would have long-term, beneficial impacts on water quality and quantity; it would reduce water use by 50-124 million gallons per year.

## Vegetation

The DEIS acknowledges extensive damage to wetlands in the planning area from cattle grazing, but focuses on protection of some wetlands in grazed areas by using fencing to control the timing and duration of grazing to reduce impacts to water quality and ecological function. The DEIS does not discuss grazing impacts on unfenced and unprotected wetlands, and documented instances of failure of ranchers and the NPS to monitor and repair fences near wetlands.

The DEIS fails to discuss grazing impacts and extensive damage to riparian areas in the planning area from cattle grazing, instead focusing on the dramatic recovery of some park riparian areas following fencing out of cattle. The DEIS does not discuss documented instances of failure of ranchers and the NPS to monitor and repair fences near riparian areas. The DEIS discussion of grasslands notes that nonnative plants dominate California Annual Grassland and Agricultural Pastureland in the planning area, but does not fully evaluate the role of cattle grazing and ranching in promoting, maintaining and spreading these nonnative plants. The DEIS discussion of invasions of non-native plant species notes that the NRCA found that the total number of invasive plant species and the number of new introductions are high enough to warrant significant concern in the planning area. The DEIS discusses the role of livestock in spreading invasive weeds, as well as via seed mixes, supplemental feed, imported soils, and equipment used in ranch operations. The DEIS notes that concentrated livestock use can also increase exposed soil, providing favorable germination sites for weeds.

The DEIS notes that coastal native prairie is a rare and diminishing ecotype, and that grazing has noticeably reduced and altered the coastal prairie. Coastal native prairie is in fact the most endangered natural ecosystem at PRNS. There is no discussion in the DEIS of how to restore native prairie in the planning area.

The DEIS acknowledges that Alternative B would have significant adverse impacts on native vegetation, including defoliation, trampling, nutrient redistribution, perpetuation of altered vegetation structure, changes in species composition and biomass production, introduction and spread of invasive species, adverse effects from nutrients on native grassland plant species, trampling of wetlands and riparian areas, reduction in native perennial forbs, and mechanical treatment of shrubs. Cattle grazing under alternative B could have some beneficial or neutral

impacts to some vegetation types and species, though this would be highly dependent on carefully managed cattle grazing regimes in which timing, duration, and intensity of grazing were monitored and controlled. NPS currently does not carefully manage, monitor or control cattle grazing in the planning area. Alternatives A, C, D, and E would have similar significant impacts to vegetation and listed plants.

Proposed mitigations for vegetation impacts under alternative B include a new zoning framework intended to keep higher intensity activities in areas without sensitive resources. An additional 1,200 acres of resource protection exclusion areas would be created. Management activities such as using sufficient fencing and/or water troughs to improve cattle distribution, "could be implemented" to minimize adverse impacts on vegetation "to the extent possible."

Other mitigations include range management guidelines, minimum RDM levels, and maintenance of exclusionary fencing.

Only Alternative F would eliminate the ongoing adverse impacts of ranching on vegetation in the planning area. The DEIS notes that riparian areas and wetlands would benefit from the removal of livestock grazing. There would be an initial increase in abundance of native perennial forbs.

Ranching operations would no longer be a pathway for the introduction and spread of invasive species. There would be a cessation of other ranching activities such as harvest mowing for forage production. Cattle grazing or trampling would no longer affect listed and rare plant species.

Removal of cattle could have some negative impacts for some native vegetation types. The DEIS cites studies showing that removal of cattle grazing did not increase native species abundance or richness in grasslands, but these studies did not consider or include the positive impact of elk, as would be the case at PRNS. NPS has available a test case for removal of cattle grazing and reintroduction of elk at Tomales Point, where native plant species diversity and richness has become greater after removal of cattle and reintroduction of elk than in adjacent areas with continued cattle grazing. Also, alternative F would use limited prescribed cattle grazing and mowing to maintain some grasslands and control weeds, which could mitigate some of the adverse impacts of changes in grazing regimes. The DEIS states that while overall, alternative F would likely have both beneficial and adverse impacts on vegetation in the planning area, the limited use of prescribed grazing could mitigate some adverse impacts of removing the livestock operations."

Impacts on listed and sensitive plants are discussed below.

## Wildlife

The DEIS notes significant impacts on native wildlife in the planning area from livestock and ranching operations: mammals are subject to disturbance, competition for resources, habitat alteration, fences, and domestic cats; ground nesting birds are susceptible to impacts from cattle grazing and vegetation management such as plowing, harvesting and mowing; agricultural operations attract and unnaturally elevate populations of corvids, starlings and cowbirds, with significant predation and dislocation impacts on native birds; agricultural activities contribute to habitat degradation and reduced water quality and quantity for fishes; and agricultural activities could affect habitat suitability and water quality for reptiles and amphibians.

Other than killing and hazing tule elk, there is no discussion in the DEIS of measures to avoid ranching conflicts with wildlife. Alternatives B, C, and D include new agricultural diversification activities which will increase ranching conflicts with wildlife.

Alternative B would result in trampling and soil compaction by cattle that could impact habitat for the American badger and Point Reyes jumping mouse, but the DEIS claims there would not be population-level impacts. Small mammals would continue to be injured or killed by silage harvest mowing. Vegetation control would reduce coast scrub habitat for the rare Point Reyes mountain beaver. Alternative B would result in impacts to native mammals from habitat modification, food web alterations, changes in nutrient cycling, and disturbance. Forage production would impact mammals through mowing on 1,000 acres. Manure spreading would continue on 2,500 acres.

Alternative B would result in impacts to birds from spread of invasive species and livestock trampling of ground nests. Mowing, harvesting silage, or occasional tillage during the nesting season could also destroy bird nests and eggs, kill fledglings, or cause adult birds to abandon their nests. 1,000 acres of the planning area would still be subject to harvest mowing under alternative B. Alternative B would continue to promote an unnatural abundance of corvids, starlings, and cowbirds that compete with, prey upon, and parasitize nests of native birds, resulting in continued impacts to birds over the long term. Alternative B could have some positive impacts and maintain habitat for grassland birds that prefer short grass or bare ground.

Wildlife-friendly fencing would be required under alternative B to reduce mammal entanglements and bird strikes, and to allow wildlife movement. Ranchers would be required to remove and dispose of abandoned fences and barbed wire, something which has not been adequately enforced in the past.

Alternative F, the elimination of livestock grazing, would have the most positive benefits for native mammals and birds, due to cessation of cattle impacts, silage mowing, manure spreading, vegetation control, and subsidizing of predators. It could have some negative ecological impacts for some native wildlife because the primary disturbance regime to which mammals and birds have adapted for more than 150 years would be removed.

### Tule Elk

The DEIS notes that the tule elk at Point Reyes are believed to be among the most inbred in California, but does not discuss any methods, solutions or efforts to counteract this or improve the genetic variability of the Point Reyes herds.

The DEIS discusses Johnes disease, but does not acknowledge that cattle, particularly in confined dairy conditions, are a known vector of this disease, nor does it discuss the primary route of transmission, which is from cattle to elk, rather than from elk to cattle. The NPS 1998 Tule Elk Management Plan discloses that in 1979 half of the dairy herds in PRNS tested positive for Johnes. NPS has done nothing in the 40 years since then to deal with Johnes disease in the dairy herds, yet it lethally tests elk. The spread of Johnes to wildlife, including elk and potentially other wildlife, could be impairing the natural resources of PRNS. NPS has an obligation under the Organic Act and Point Reyes Act to remediate the problem. If any livestock are allowed to remain at PRNS, the GMPA should require regular testing of livestock for Johnes and other diseases transmissible to wildlife, and all dairy herds should be made disease free by culling or removal.

Some of the methodology and assumptions in the DEIS regarding tule elk are flawed. The DEIS evaluates impacts of the alternatives on elk based on their overall effect on elk population size and herd viability. The DEIS concludes that any actions that would reduce the population of an individual elk herd in the planning area below a minimum threshold for a viable herd of 100 elk (purported to be based on CDFW 2017 and 2018) would have adverse effects on elk over the long term.

Alternative B proposes arbitrary minimum and maximum population sizes for the Drakes Beach elk herd of 100-120 elk. The NPS falsely claims this is based on guidance from the California Department of Fish and Wildlife (2017, 2018) Elk Conservation and Management Plan. Yet this CDFW elk plan contains no such guidance on maximum or minimum population size. In fact, the states elk plan explicitly acknowledges that CDFW has no idea what constitutes minimum population viability (MPV) for elk herds and states it is beyond the scope of this management plan to validate a specific PVA approach or independently estimate MVP size for tule elk (see discussion pages 27-31 of the elk plan). The CDFW elk plan does reference minimum population viability size estimates for elk by the U.S. Forest Service, which range from 1,500 elk on the Salmon National Forest to 3,000 elk on the Gallatin National Forest, way more than the 120 elk proposed in alternative B.

We raised these exact issues during scoping for the GMPA, but NPS has ignored our comments and continued this misinformation in the DEIS. The DEIS fails to explain the science or ecological rationale behind the arbitrary 100-120 Drakes Beach elk goal, and explain why a maximum population threshold is needed for the Drakes Beach elk herd. There is no ecological justification for limiting the size of this elk herd. The DEIS acknowledges that under no scenario are elk expected to exceed the parks carrying capacity in the near future

Alternative B would allow lethal removal of 10 to 15 adult elk from the Drakes Beach herd annually. Removals would target suspected diseased animals, older reproductive females, and prime bulls. There is no discussion in the EIS what the population demographic and genetic fitness implications would be from continuously removing older reproductive females and prime bulls from this herd.

Alternative B would artificially limit the geographic extent of the Drakes beach herd using hazing techniques. There is no discussion in the EIS what the impacts of this would be during years of extended drought and reduced forage availability for elk. The DEIS acknowledges that hazing elk is not a very effective method to keep male bachelor groups off of ranchlands.

Alternative B would also allow hazing and lethal removal for the Limantour elk herd, to manage the herds geographic extent if individuals establish outside the core use areas or to address "localized impacts." The DEIS does not explain what these localized impacts are, but they are presumably impacts to private ranching operations, not park resources.

Wildlife-friendly fencing would be required under alternative B, and more lowered elk crossings could be installed in the areas frequented by the Drakes Beach and Limantour herds, which could reduce the risk of injury to elk compared to existing fencing conditions, which are documented to injure and kill elk.

Alternative B would continue Johnes disease monitoring and testing for elk, but not for cattle at PRNS, a primary vector of this disease. The DEIS does not disclose whether lethal testing of elk for this disease will continue under alternative B, nor the numbers of elk that would be killed annually under the guise of testing for a disease which NPS has no intention of managing in the PRNS dairy cattle herds.

Alternative C would kill the entire Drakes Beach herd, an unprecedented slaughter of native wildlife in a national park to appease private commercial leaseholders.

Only under alternative F would Point Reyes elk be free of persecution and killing. Both the population and geographic extent of elk would increase in Point Reyes. The fence at Tomales Point would be removed. Ranching activities would not disturb elk and cattle would not compete with elk for forage because ranching would be discontinued. Without population control, the free-range elk population could grow to as many as 2,000 individuals over a 20-year period. This would be a desirable condition in the only national park where these elk occur.

#### Listed and Sensitive Species

The DEIS contains a misleading discussion of the 2002 and 2004 Biological Opinions with regard to impact thresholds for species listed under the Endangered Species Act (ESA). The DEIS implies that previous no jeopardy determinations by the federal resource agencies U.S. Fish and Wildlife Service (USFWS) and National Marine Fisheries Service (NMFS) means that there was not a finding of harm to listed species. Jeopardy is a term under the ESA with a specific meaning: whether an evaluated action or project in and of itself would jeopardize the continued existence of an entire species or listed population. A no jeopardy determination by USFWS or NMFS does not mean no harm would occur to a listed species. The more relevant metric for NEPA purposes of determining significant impacts is whether the regulatory agencies made a Likely to Adversely Affect (LAA) determination for any listed species. A Not Likely to Adversely Affect (NLAA) determination could indicate that the threshold of significance may not have been met for NEPA purposes. A LAA determination means there are significant impacts to a listed species, which would require avoidance or sufficient mitigation under NEPA.

The 2002 and 2004 Biological Opinions from USFWS and NMFS are proof that NPS routinely underestimates the impacts of livestock grazing and ranching activities on listed species. In 2001 NPS made NLAA determinations in a Biological Assessment for the effects of grazing on 8 terrestrial listed species. The DEIS discloses (Appendix K, pp. 54-55) that the USFWS disagreed with 75% (6 of 8) of those NPS determinations and changed them to LAA for those species (Beach layia, Sonoma alopecurus, Sonoma spineflower, Tiburon paintbrush, Tidestroms lupine, and

Myrtle's silverspot butterfly). The USFWS (2002) agreed with two NLAA determinations made by NPS for California freshwater shrimp and Marin dwarf flax; and concurred on two LAA determinations made by NPS, for California red-legged frog and western snowy plover. NMFS (2004) disagreed with 100% (2 of 2) of the NLAA determinations made by NPS in a 2001 Biological Assessment for Central California Coast coho salmon and steelhead trout, and changed them to LAA.

In the terrestrial Biological Assessment NPS has recently prepared for the current GMPA (DEIS, Appendix K), NPS has concluded that livestock grazing and other ranching activities are Likely to Adversely Affect, that is have significant negative impacts, on 7 listed species: Beach layia, Sonoma alopecurus, Sonoma spineflower, Tiburon paintbrush, California red-legged frog, Western snowy plover, and Myrtles silverspot butterfly. NPS has concluded NLAA for Marin dwarf flax, Showy Indian clover, Tidestroms lupine, and California freshwater shrimp. USFWS may disagree with some of these NLAA determinations. In the marine Biological Assessment NPS has recently prepared for the GMPA (DEIS, Appendix J), NPS has concluded that livestock grazing and other ranching activities are Likely to Adversely Affect, that is have significant negative impacts, on Central California Coast steelhead trout and California coastal Chinook salmon. NPS has concluded NLAA for Central California Coast coho salmon, but NMFS may disagree with this determination. There are enough negative impacts from cattle grazing and ranching, as well as controversy on environmental grounds for all of the listed species, to consider alternatives A-E to have significant impacts which need to be avoided or adequately mitigated under NEPA.

#### Beach Layia

The DEIS notes that cattle directly affect Beach layia through trampling, as well as indirectly via increased weeds associated with grazing disturbance. Livestock trampling was indicated as a threat when beach layia listed. The DEIS acknowledges that since 2004, the beach layia population in PRNS has declined 84% - from an estimated 35,893 plants in 2004 to 5,689 plants in 2018 - and that beach layia occurrences subject to grazing have declined in abundance an unspecified amount since 2004. Beach layia populations in dunes in the planning area are subject to trampling by cattle loafing in the dunes.

Alternative B proposes avoidance and mitigation measures to protect beach layia which rely on exclusions and effective and maintained fencing. The DEIS acknowledges current adverse impacts from grazing on approximately 20% of known beach layia occurrences, but presumes that zoning would reduce that because 12% of the layia population would be protected by new resource protection exclusion areas on the E and F ranches. This would eliminate the potential effects of cattle trampling on all but 8% of known beach layia occurrences in the Range subzone. The DEIS acknowledges that although cattle would be excluded from areas supporting nearly 90% of all known beach layia occurrences in the park, they could occasionally breach pasture fences and trample beach layia in protected coastal dunes. This could occur as a result of broken fences, gates being left open, or the poor siting of pasture fences in sandy areas. The DEIS notes that ranchers are responsible for maintenance of fences, but that NPS will work with ranchers to ensure the continued exclusion of cattle from coastal dune habitats.

#### Marin Dwarf Flax

The DEIS acknowledges that limited information is available about the tolerance of Marin dwarf flax to cattle grazing or soil disturbance, and the effects of livestock grazing on Marin dwarf flax were unknown at the time of its listing. The DEIS notes that trampling by livestock is a potential threat. However, livestock grazing could have some beneficial impacts through reduction of taller competing vegetation, reducing annual grasses, preventing thatch accumulation, mechanically breaking down the litter and opening canopy, and limiting the enrichment of low-nutrient serpentine soils with nitrogen thus limiting annual grass invasions. Marin dwarf flax is present in all known patches in the planning area and numbers appear stable in comparison to previous years.

Alternative B proposes mitigation measures to avoid or minimize potential adverse effects of overutilization or trampling of individual Marin dwarf flax plants. These include grazing lease adherence to the parks RDM standards and general measures to avoid or minimize the potential for spread of non-native plants. NPS claims it

would monitor for adverse effects from cattle grazing and work with ranchers to adjust the timing and/or intensity of cattle grazing on Nicasio Ridge for the continued protection of Marin dwarf flax.

### Showy Indian Clover

The DEIS acknowledges that the effects of livestock grazing on showy Indian clover are not well understood. It notes that herbivory by cattle is a threat to the small populations in the planning area and that some historic locations with showy Indian clover could have been eliminated due to cattle grazing. Cattle grazing or trampling could cause plant injury or mortality, but could also benefit showy Indian clover via disturbance and reduced competition from non-native plants. Populations introduced to the D ranch in PRNS were separated by fencing, with one side grazed by cattle and elk, and the other side grazed only by elk. As of 2016 a subset of plants in the cattle-grazed area had the highest number of flowering heads, suggesting possible beneficial effects from livestock grazing.

Alternative B proposes mitigation measures to ensure that adverse grazing effects to introduced showy Indian clover are avoided on D Ranch. NPS claims it would manage livestock timing, duration, and grazing intensity in a manner that is compatible with the persistence of showy Indian clover.

### Sonoma Alopecurus

There are only 20 occurrences of Sonoma alopecurus remaining in the world. At one point, there were 10 Sonoma alopecurus populations in PRNS, but 4 have been extirpated leaving 6 of the 7 existing populations of this species in the park. Trampling and grazing by cattle has been one of the factors for decline of the species. One population in the planning area was reduced by 90% in 2001 after cattle were released onto the site. Grazing can result in trampling of individual plants, soil compaction, and influence the presence of competitive invasive species. Heavy grazing of this plant can also limit its ability to photosynthesize, which could result in death or diminished reproductive output.

Conversely, some grazing regimes may be beneficial and necessary to maintain Sonoma alopecurus in the face of competition from other plants. NPS monitoring of Sonoma alopecurus in the action area suggests that it thrives in wetlands that are grazed just enough to reduce competing vegetation. Moderate-intensity grazing would reduce competition from more abundant native plants or non-native species. Seasonal grazing appears to result in more Sonoma alopecurus inflorescence production than no grazing or year-round grazing.

Alternative B proposes mitigation measures for Sonoma alopecurus, including instituting seasonal grazing on the AT&T Ranch and seasonal exclusion of grazing around Population 5 near Abbotts Lagoon. The NPS claims it would use ROAs to direct the appropriate timing, intensity, and duration of grazing. Fence construction around populations would allow cattle to be excluded in the spring and summer to avoid impacts to plants during active growth, flowering, and seed-set. Adherence to RDM standards is supposed to ensure moderate grazing. NPS states it would monitor populations and coordinate with ranchers to adjust grazing if there are any documented adverse effects in pastures. The DEIS acknowledges that the extent of cattle grazing that is advantageous for Sonoma alopecurus is unknown and so the potential for inappropriate cattle grazing would still exist.

### Sonoma Spineflower

NPS has performed several introductions of Sonoma spineflower in grazed pastures in the planning area, at least five of which have been successful in establishing new occurrences. The DEIS notes that the one wild population and nearby introduction sites on G Ranch appear to have generally declined since 2011, and that intensity and timing of cattle grazing could be one of the factors in the decline. The DEIS acknowledges that the impact of cattle on Sonoma spineflower is unknown and that cattle grazing could have beneficial or potentially detrimental effects, depending on grazing timing and intensity. NPS presumes that Sonoma spineflower benefits from a moderate grazing regime, and that damage caused by livestock trampling is outweighed by the benefits of grazing reducing competition from other plants.

Alternative B proposes mitigation measures for Sonoma spineflower that primarily consist of NPS promising to monitor existing populations, and work to remove non-native or other plants that may compete with Sonoma spineflower.

#### Tidestroms Lupine

The DEIS notes that cattle grazing has been associated with the extirpation of Tidestroms lupine elsewhere in Marin County. In the planning area 85% of occurrences of Tidestrom's lupine are in areas largely excluded from cattle grazing. For 15% of the remaining occurrences, cattle currently directly affect the plants through trampling and indirectly affect them via increased weeds associated with grazing disturbance. Trampling by livestock was the cause of some plants at PRNS going from a reproductive to non-reproductive state.

Alternative B proposes mitigation measures for Tidestroms lupine, including a new 67-acre resource protection exclusion area on the F Ranch intended to protect all known Tidestroms lupine occurrences that are potentially impacted by grazing under existing conditions. The DEIS acknowledges that a small number of Tidestroms lupine occurrences could be negatively impacted if cattle breach pasture fences and loaf in coastal dunes. Cattle trespassing in coastal dunes could occur if pasture fences are poorly sited, inadequately maintained, or if gates are left open.

#### Other Sensitive Plant Species

The DEIS states that other rare and special-status plant species would continue to be adversely affected by cattle grazing or trampling, including coastal marsh milkvetch (*Astragalus pycnostachyus*), swamp harebell (*Campanula californica*), Point Reyes ceanothus (*Ceanothus gloriosus*), Marin checker lily (*Fritillaria lanceolata* var. *tristulis*), North Coast phacelia (*Phacelia insularis* var. *continentis*), and Point Reyes checkerbloom (*Sidalcea calycosa* ssp. *Rhizomata*).

#### Alternative F and Listed Plants

The DEIS has an inadequate discussion of the benefits to listed and special-status plant species following the cessation of commercial livestock grazing and restoration of a more natural ecology under alternative F. The DEIS does state that beach layia and Tidestroms lupine would likely benefit under alternative F. It does not factor into consideration the fact that planned prescribed seasonal livestock grazing which would occur under alternative F could be targeted to provide specific benefits Sonoma alopecurus, Tiburon paintbrush, Marin dwarf flax, Sonoma spineflower and showy Indian clover, plants which may benefit from managed cattle grazing regimes. The DEIS also fails to evaluate or consider whether elk and other native grazers and browsers could perform similar vegetation management functions as cattle, in terms of reducing competing vegetation to provide benefits to these listed plants in the absence or regular cattle grazing.

#### Western Snowy Plover

The negative impacts of cattle grazing and ranching impacts on snowy plovers at PRNS are well documented and discussed in the DEIS. The biggest impact is from unnatural elevation of populations of common ravens near snowy plover beaches, which increases predation upon snowy plover eggs and chicks. Large raven populations are subsidized by ranch activities that provide food sources, such as livestock feeding and forage mowing that kills birds and small mammals, attracting ravens.

There are also direct impacts to plovers from cattle, including disturbance to birds or trampling of nests and crushing of eggs. The presence of cattle within nesting areas could also result in nest failure due to western snowy plovers being flushed from their nests for extended periods of time. The DEIS acknowledges that livestock do escape pasture fences and trespass onto beaches and coastal dunes occupied by western snowy plovers, but only rarely. Our organization has reported trespass cattle at PRNS within snowy plover nesting areas.

Under alternative B, the DEIS claims that NPS 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. The DEIS also states that NPS has coordinated with ranchers to limit raven access to supplemental feed and shelter and worked with ranchers to install covered feed bins. However, large congregations of ravens can still be observed feeding at uncovered food sources at PRNS ranches and dairies. Every observation of forage mowing at PRNS has a large number of attendant ravens. The DEIS admits that it is uncertain whether alternative B would reduce indirect impacts of ravens.

Alternative B proposes mitigation measures for western snowy plovers intended to reduce the attraction of ravens by ranches and dairies. These include inspection by ranchers of all pasture fences prior to moving cattle into a pasture, a highly unlikely scenario. ROAs would require annual fence maintenance, but how this would be enforced and whether maintaining on an annual basis would be adequate are not discussed. NPS has eliminated the existence of carcass dumps which attract ravens and the DEIS claims NPS would find ways to ensure that afterbirths and dead livestock are disposed of quickly by ranchers, but does not detail how this would be accomplished.

Under alternative B, where agricultural diversification is proposed to be allowed, NPS claims it would require methods to reduce feeding opportunities for common ravens at ranches and dairies, including requiring ranches to cover or remove feed troughs or place them in structures where possible, storing harvested crops in enclosed structures, and cleaning up waste grain around troughs. These are measure supposedly already in place for cattle which are not being complied with by ranchers and not monitored and enforced by NPS.

Under alternative B, mitigation measures to reduce wildlife mortality during forage mowing include conducting harvest mowing outside bird nesting season, mowing from inside the middle of a field toward the outside to increase likelihood for wildlife escape, using flushing bars on the mower to flush incubating birds and mammals before the mower reaches them, and not mowing at night when there would be higher wildlife mortality. The DEIS does not detail how these measures will be implemented, monitored, or enforced.

#### Listed Salmonids

The myriad of negative impacts from livestock grazing on salmonids and their habitat are well known and well documented, as discussed in the DEIS and the NMFS 2004 Biological Opinion for PRNS and GGNRA. These include increased erosion, sedimentation, and suspended sediment; damage to riparian vegetation and streambanks; increased water temperatures; and adding nutrients, sediment, bacterial contaminants, and other pollutants into streams. These impacts could degrade habitat for listed salmonids in the planning area, including California coastal Chinook salmon, Central California coastal steelhead, and Central California coast coho salmon.

The DEIS claims that these impacts are minimized due to adherence to RMD standards, grazing in riparian areas in grazed pastures that is managed for riparian health, fencing and topography which prevents livestock access to Olema Creek, Lagunitas Creek and numerous tributaries, and development of upland water sources which reduce livestock use of most intermittent streams.

Mitigation measures for salmonids under alternative B would include implementation of management activity standards in appendix D, and range management guidelines that minimize erosion and stormwater runoff. There would be new resource protection areas that would exclude cattle from approximately 2.4 miles of perennial streams in the Lagunitas and Olema Creek watersheds and 1.6 miles of streams in the Drakes Estero watershed. Fencing is expected to keep cattle out of salmonid-bearing streams, but habitat for salmon and steelhead could be directly affected if cattle breach pasture fences into excluded riparian areas. Impacts to salmonids in the Range sub-zone would also be avoided or minimized through adherence to the RDM standards. Use of commercial fertilizer would no longer be authorized in the park.

#### California Freshwater Shrimp



The DEIS acknowledges that under alternative B, cattle grazing would continue to cause localized, minor, adverse effects to California freshwater shrimp in some stream reaches due to sedimentation of streams, nutrient inputs from cattle manure, and reduced aquatic habitat and water quality. Adverse impacts to shrimp are not predicted in Lagunitas Creek and lower Olema Creek because livestock fencing keeps cattle out of Lagunitas and Olema Creeks and the reaches where California freshwater shrimp occur are bordered by substantial riparian vegetation, which the DEIS postulates could reduce potential impacts from pollutants or sediment in stormwater runoff from ranches. Mitigation measures for alternative B for freshwater shrimp include adherence to RDM limits as specified in individual ranch ROAs.

#### California Red-Legged Frog

Livestock and ranching impacts on red-legged frogs are complex, with habitat provided for frogs by stock ponds, but many adverse impacts from grazing including removal of vegetation, trampling and siltation of streams and ponds, trampling of individual frogs or eggs, reducing habitat for invertebrates that provide prey, and decreased water quality and increased nutrient inputs from cattle manure. The DEIS and the USFWS (2002) Biological Opinion extensively cover the numerous adverse impacts to frogs from grazing. The DEIS also notes that a variety of diversification activities could harm California red-legged frogs through mortality, capture, injury, and harassment.

The proposed mitigations for red-legged frogs in alternative B include monitoring and unspecified measures in individual ROAs, which NPS assures would specify areas to be avoided by certain ranch activities, including mowing, shrub management, weed management, and nutrient management. Impacts on California red-legged frogs would be reduced by zoning, with the NPS not authorizing ranch activities other than grazing in the Range sub-zone, which would comprise approximately 70% of the planning area and contain nearly all the surface water resources in the lands under grazing lease/permits. Necessary uplands and migration habitat for red-legged frogs could also occur in the Pasture or Ranch Core sub-zones, which NPS claims will be protected by avoidance, minimization, and mitigation measures. NPS claims that adherence to RDM standards would provide for maintenance of herbaceous vegetation cover and protection from soil erosion. Mitigation for diversification impacts on frogs consists solely of measures to minimize runoff.

#### Myrtles Silverspot Butterfly

The DEIS acknowledges that cattle grazing activities within the habitat of the Myrtle's silverspot butterfly may result in trampling of eggs, larvae, and adults, as well as potential destruction of host or nectar plants via consumption, trampling, soil compaction, erosion, spread of invasive species, and other deleterious effects. It acknowledges that heavy grazing could reduce nectar sources for the butterfly. Conversely, grazing activities could help maintain suitable habitat for these butterflies by removing competitive vegetation and minimizing vegetative cover, which increases the density of nectar sources. The DEIS cites studies which suggest that managed grazing may be necessary to ensure the persistence of nectar sources, and by extension Myrtles silverspot butterflies, in coastal annual grasslands. The DEIS concludes that a moderate grazing regime does not significantly affect the distribution of Myrtle's silverspot butterfly, and that well-managed grazing is compatible with conservation of the butterfly. The DEIS admits that the effects of livestock grazing on Myrtle's silverspot butterfly host plants and its food sources are under debate, and that the optimal grazing regime most beneficial to Myrtles silverspot is not yet known.

Under alternative B, the DEIS claims that adverse effects to Myrtle's silverspot butterfly from overgrazing would be avoided by adherence to the parks Range Management Guidelines, which specify minimum levels of RDM of 1,200 pounds per acre.

#### Visitor Use, Experience, and Access

The DEIS acknowledges that the experience of park visitors who enjoy elk would be adversely affected by alternative B because the Drakes Beach herd would not be allowed to expand. The DEIS claims that lethal control, i.e. shooting of elk in the most viewed free-roaming elk herd would somehow not affect visitor experience or

enjoyment.

The DEIS makes the unsubstantiated claim that viewing livestock and ranching operations brings visitors to the park. The DEIS provides no evidence or substantiation for this assertion, nor does it provide any context of what proportion of park visitors come to view native wildlife and intact ecosystems versus to see ranching operations. The DEIS also notes that under alternative F visitors would no longer be able to experience working ranches in the planning area and claims that removing operating ranches would eliminate a unique experience that the park currently provides. Cattle ranching in the parks is in no way a unique experience. There are numerous working ranches surrounding PRNS and GGNRA, throughout Marin and Sonoma counties, many of which offer tours or farm stays. There is no loss to public use or enjoyment of the parks by removing these commercial activities, especially when they are ubiquitous in west Marin and Sonoma. The DEIS acknowledges that under alternative F, NPS would continue to offer and possibly expand interpretive opportunities related to ranching history.

There is little meaningful discussion of ranchings negative impacts on the publics use or enjoyment of the park. The DEIS cites electric fencing, interactions with cattle, and manure management as ranching operations which diminish the visitor experience; but fails to fully discuss the negative aesthetic impacts of the ranches and industrial scale dairy operations, including odors, lighting, noise, abandoned agricultural equipment, barbed wire, and trash. The DEIS does not discuss the safety danger from ranching to park visitors, including potential trampling and injury from aggressive cattle and bulls, and road hazards and damage to roads from oversized farm equipment.

The DEIS acknowledges that alternative F would be beneficial to visitor opportunities related to experiencing natural sights and sounds in the parks, and that the negative impacts of cattle and ranch operations on natural resources such as vegetation, wildlife, water resources, and air would cease as the park is restored to a more natural environment. The DEIS acknowledges that potential expansion of the elk population in Point Reyes under alternative F would result in long-term, beneficial impacts on visitor use and experience for visitors who enjoy observing elk in their natural and historical habitat, which is the vast majority of the American public and visitors to the park. The Drakes Beach and Limantour herd populations would increase, providing additional opportunities and new locations for visitors to view elk. In addition to the Drakes Beach and Limantour herds, the Tomales Point elk fence would be removed, and all elk would be free ranging throughout the park. The Tomales Point herd would likely expand into the planning area, which would benefit visitor experience by increasing viewing opportunities.

#### Greenhouse Gasses

Cattle are the overwhelming source of greenhouse gases at PRNS. The DEIS quantifies that ranching activities and livestock emissions are responsible for 87% of the park's CO<sub>2</sub>-equivalent emissions (24,611 of 28,345 metric tons per year).

The DEIS fails to evaluate the significance of these emissions in the context of the 2008 designation of PRNS as a Climate Friendly Park and the development of a Climate Action Plan to attempt to reduce the parks carbon footprint, and how ranching and dairying activities subvert PRNS goals in the Climate Friendly Parks campaign.

There is no discussion of mitigation for cattle impacts to the climate in any of the alternatives. Methane, produced by cattle, is a greenhouse gas 25-100 times worse than carbon dioxide. For any alternative which allows continued dairy ranching, the EIS should disclose whether the NPS will require methane digesters.

Under alternative B, emissions from ranching would be generally the same type and intensity as described under the existing conditions. Alternative E eliminating dairy ranching would lead to a measurable reduction in ranching-related emissions of NH<sub>3</sub> (98%), VOC (56%), and CO<sub>2</sub>e (66%). Under alternative F virtually all ranching-related emissions of criteria pollutants and GHG emissions would end within five years, and the remaining emissions would eventually also cease. Vehicle trips associated with the ranches would be eliminated, further reducing overall emissions.

So-called carbon farming, or rangeland carbon sequestration, is raised in the DEIS as a possible measure to reduce GHG emissions from ranching in the park units. This is an proven experiment, so the EIS should discuss whether any peer-reviewed science supports the concept of carbon sequestration through livestock grazing, what can realistically be sequestered versus the CO2 footprint of ranching operations, and what the environmental impacts and tradeoffs are. Many carbon farming schemes fail to account for numerous ranching sources of GHG emissions (including vehicle trips and equipment), rely on inflated estimates of grassland sequestration potential, and assume unrealistic grazing regimes. The NPS should not allow compost use on rangelands before any CO2 offset impacts are proven. The NPS should promote restoration of native grassland to sequester carbon.

### Diversification

The Center opposes allowing any diversification, or new agricultural activities, under any alternative, due to unacceptable potential impacts to native wildlife and wildlife habitat. Diversification is included in all the alternatives except No Action (A) and No Ranching (F). It would allow each rancher to add crops and previously unauthorized small livestock such as pigs, sheep, goats, and chickens to their operations. The DEIS fails to fully evaluate the impacts of this expanded agriculture on the parks wildlife or natural resources. There is no discussion of what measures will be taken when inevitably park predators such as coyotes, bobcats or foxes take chickens, lambs or other small livestock. For context, the NPS has already shot 25 elk and harassed them out of ranch areas, and under the GMPA is planning to continue to shoot and harass native elk. This is the NPS response to unsubstantiated claims by ranchers of impacts to cattle operations, for one of the signature native wildlife species at PRNS, and a major attraction for park visitors. The DEIS is obligated to contemplate and evaluate what lethal and exclusion methods the ranchers will insist on and what methods NPS will consider once conflicts inevitably arise with native predators due to presence of small livestock, and after predation by native birds on new row crops.

Proposed mitigation measures for diversification activities are contained in Appendix D, table D-11. The problems with these mitigations are discussed below.

### Grazing Lease Succession

Under the Point Reyes Act, ranching leases were given to the owners of ranches at the time of their acquisition by the National Seashore, and their heirs. Allowing for "multi-generational ranching" was an early accommodation to the ranchers who sold their land for the park. In addition to generous compensation (the equivalent of \$340 million in today's dollars), ranchers were allowed to lease back their land either for 25 years or for lifetime estates. The NPS later agreed to allow the heirs of the original ranch owners to stay on in the park as long as they continued ranching. After that, the ranches would be retired.

Under alternative B, NPS would not retire ranches when the heirs of the original ranchers retire. Instead, NPS would offer those leases to other relatives, and if they decline, to neighboring ranchers, and if they decline, to anyone who wants to lease land in the park. No prior connection to the Seashore would be required for grazing leaseholders. This is an attempt to make ranching leases in PRNS permanent, which would be illegal under the framework of the Point Reyes Act.

### Recreational Development

Under alternatives B, C, D, E, and F, the NPS proposes to increase visitor use and enjoyment through new trails, expanded recreation, and addition of day use and overnight accommodations. These will all likely require likely require additional project-specific environmental review.

The Center supports the concept of improved public access and new trails, especially if they are sited as contemplated in the DEIS, with most new trail routes using existing administrative roads, including ranch roads, and with limited new trail construction. Trail opportunities would focus on loop routes, connectivity with adjacent public lands, and facilitation of north-south connectivity across the landscape. Most routes would be minimally maintained and would have a rural, backcountry character. Routing of individual trails and allowable

trail users (such as bikes and horses) will need to take into consideration sensitive natural resources, such as habitats for endangered species, wetlands, highly erosive areas, etc.

Under alternative F many of the former ranch areas and their associated facilities would be converted and offered for public not-for-profit education, research, outdoor experiential activities, and other public recreation and visitor opportunities. We support this concept. Under alternative F the GMPA also proposes to use vacant ranch infrastructure for overnight stay concession operations (e.g., hostel in the buildings; campground in the pasture; possible yurts, tent cabins, or other similar structures that offer an overnight option between tent camping and commercial lodging). Allowance of such operations would need to take into consideration sensitive natural resources and the localized impacts, and include measures to reduce visitor impacts. There should be programs in place to reduce trash generation at these locations. Any new campgrounds or overnight stay operations would likely require additional project-specific environmental review.

The GMPA also contemplates drive-in, hike-in, and boat-in camping sites with limited services and amenities. It suggests several locations to consider for expanding overnight camping, such as Schooner Bay near Drakes Estero or Home Ranch. Under no circumstances should any boat-in camping be allowed in the Drakes Estero wilderness area. The NPS underwent a long and expensive process to remove the commercial oyster farm from this estuary and clean up and remediate all the infrastructure, garbage and invasive species left behind by the oyster farm. The wildlife and habitat of Drakes Estero is still recovering from that commercial legacy. Boaters already flush and disturb resting seals and birds in the estuary. Drakes Estero is too fragile an ecosystem and too important a resting area for marine mammals and birds to sustain such increased visitor use and human disturbance. There is already boat-in camping on Tomales Bay, and those activities result in overuse, trash, and trampling of habitats by boaters landing on shore. Such intensive impacts should not be introduced to Drakes Estero.

The DEIS proposes to expand interpretation and education of historic districts and ranching in the park. This effort seems focused on solely on "sharing the story of ranching in the park." We raised the issue in scoping that the GMPA should also dramatically expand interpretation of the Coast Miwok people and of pre-grazing natural ecosystems at Point Reyes. The DEIS does not address non-ranching interpretation and education.

### Inadequacy of Mitigation Measures

The proposed mitigation measures for all of the significant environmental impacts from livestock grazing and ranching activities discussed above consist of eight main approaches: 1) new sub-zoning of ranches to avoid cattle grazing in areas with sensitive resources and to concentrate more intensive activities and impacts in ranch core zones; 2) exclusion fencing to prevent cattle access to areas with sensitive resources; 3) some combination of ranchers and NPS managing rotation, timing, and duration of livestock to achieve grazing levels that are not detrimental or could be beneficial for certain habitat types and species; 4) adherence to RDM standards to prevent overgrazing; 5) a Ranch Operating Agreement specific to each grazing lease/permit that specifies what activities can occur; 6) a grab-bag of best management practices and standards from other agencies listed in Appendix D; 7) mitigations for impacts to ESA listed species contained in the Biological Assessments (Appendices K and L); and 8) some combination of rancher compliance and NPS monitoring and enforcement of lease conditions and promised avoidance and mitigation measures.

The DEIS is relying on some combination of these mitigation measures to reduce significant environmental impacts from the livestock grazing and ranching activities that would take place under alternative B.

While the sub-zoning is a promising concept, it relies heavily upon ranchers understanding and NPS enforcing which activities are not permitted in which zones. Resource Protection sub-zones would, at least on paper, remove grazing from sensitive resources such as riparian areas, surface waters, and federally listed wildlife habitat. The zoning maps make clear that this is going to be a confusing situation at best. For example, the I Ranch zoning map provided in the DEIS shows how difficult it will be to actually delineate, let alone protect resources or prohibit activities in Resource Protection sub-zones:

The responsibility for monitoring and maintaining exclusion fencing seems to lie with the ranchers, with some oversight from NPS. PRNS has had continuing problems with unmaintained fences allowing cattle to access supposedly protected areas. Likewise managing rotation, timing, and duration of livestock grazing will be the responsibility of ranchers, with some oversight from NPS. Presumably these responsibilities will be spelled out in the individual Ranch Operating Agreements, which have not yet been produced and the public has no chance to view or comment on.

PRNS and the NPS have a long history of complete failure to adequately monitor ranching operations or enforce the conditions of PRNS grazing leases. Because of past history and lack of public confidence, we asked NPS in our scoping comments to disclose the ongoing monitoring and enforcement problems with grazing leases, specifically: continuing instances of grazing lease violations by ranchers; if and how the NPS ensures compliance with lease conditions; and whether the NPS has ever taken any enforcement action for grazing lease violations, which it apparently has not. The DEIS utterly fails to disclose these issues or evaluate NPS ability to adequately monitor and enforce lease conditions and promised mitigations in the future.

NPS documents we obtained through a Freedom of Information Act (FOIA) request showed a pattern of grazing lease violations by some ranchers and a lack of any enforcement by NPS for lease violations. These violations included: harassing and hazing wildlife with vehicles and dogs; illegal dumping of debris on ranches, including tangled barbed wire strands that risk elk entanglement; trespass cattle regularly occurring for more than a decade; documented overstocking of cattle beyond numbers allowed in a lease; conducting hayage and silage tilling and mowing in unauthorized areas; dead cattle and calves dumped on a ranch in violation of the lease; and failure to pay permit fees on time. Some of these lease violations are posted on The Shame of Point Reyes web site: <http://www.shameofpointreyes.org/documents.html>. Grazing lease violations which our organization and other conservation groups and local residents have more recently reported to NPS were ignored and were not contained in the files turned over by NPS. The FOIA documents we received from the agency made it clear that NPS has no systematic or comprehensive program to monitor grazing leases or ensure compliance with lease conditions.

There should be very little public confidence in the willingness or ability of NPS to monitor and enforce any promised grazing lease conditions, given the history of rancher violations and NPS failure to enforce them. The ROAs contemplated in the GMPA will be much more complex leases, with numerous conditions and mitigation measures. Many of the promised mitigations in the DEIS are simply not credible absent a detailed, specific monitoring program conducted by NPS, not ranchers. The GMPA would need to identify dedicated staff and secure funding for regular monitoring, unannounced inspections, and an enforcement policy. It would need to show that these programs would be in place, funded, and effective for the duration of the grazing leases. It would require regular reporting to the public on grazing lease compliance and corrective measures.

Reliance on the RDM standards for mitigation is also flawed, due to unscientific forage calculations and rancher non-compliance with RDM standards. The NPS and the DEIS overestimate available forage at PRNS, based on overly optimistic and not up to date soil productivity data, animal unit calculations based on inaccurate average cattle weight, and an assumption that 100% of the forage above the required minimum RDM is allocated to cattle. The forage calculations also do not account for new livestock which will be introduced under alternative B. The DEIS is missing a detailed analysis of forage consumption for any new domestic animals. Furthermore, the U.C. Berkeley rangeland study which NPS commissioned (Bartolome et al. 2015) reveals that 33% of the studied rangelands at PRNS violated the NPS lease minimum RDM standards, the same standards that are included as mitigations in the preferred alternative.

Many of the mitigations for significant impacts are purportedly contained in Appendix D of the DEIS. Appendix D seems designed to be confusing and to obscure what mitigations are mandatory and what mitigations are required for which impact. It covers a lot of mitigations and standards for infrastructure, planting, water supply, water management, and discrete projects, for example road upgrades and fencing. There are a couple places in Appendix D where specific measures are called out for specific activities of concern, such as for mowing a

requirement for buffers and no mowing zones. The DEIS claims NPS staff will monitor to ensure mowing does not exceed agreed-upon areas, but again there is no identification of dedicated staff, funding, or a monitoring program to ensure this will actually happen. Table D-11 is just a slapdash assortment of guidelines and best management practices from other agencies assembled in a confusing and incoherent manner. Appendix D does not further the public understanding of what measures are going to be implemented to protect natural resources.

Many of the mitigations in Appendix D are simply non-binding Marin County RCD and NRCS best practices and standards with respect to things like soil, water and vegetation conditions. They include USDA farming standards (also non-enforceable guidelines) as mitigation measures for the conservation of soil, water, air, and related plant and animal resources. The DEIS is supposed to address mitigations for activities in national parks, not a farm.

What is glaringly absent from Appendix D are the three resource protection statutes which apply to PRNS and GGNRA, and the standards of maximum protection, restoration, and preservation of the natural environment, and leaving natural resources unimpaired for future generations to enjoy.

Many of the mitigation measures in Appendix D rely upon plans which have not been formulated yet, with unknown conditions, and no ability for the public to view or comment upon them, including Stormwater Pollution Prevention Plans, Weed Monitoring Plans, Nutrient Management Plans, Manure Management Plans, and Conservation Plans from NRCS or NPS for silage or row crops.

The proposed mitigations for ESA listed plants and wildlife are spelled out in Biological Assessments (Appendices K and L). It is clear that the purported beneficial effects from cattle grazing on native plants is highly dependent on the season, intensity and duration of grazing. This would require very highly managed grazing operations, which NPS and the ranchers have never proven capable of conducting at PRNS or GGNRA. Successful rotational, seasonal grazing of the type contemplated in the Biological Assessments would require frequent monitoring by NPS, rancher acceptance and responsiveness, willingness and motivation for lease holders to comply with difficult and confusing constraints, and enforcement. Some of the mitigations for the listed plants rely on adherence to RDM standards, which has been problematic at PRNS.

#### Failure to Disclose Costs of Ranching

Our scoping comments explicitly asked NPS to disclose to the public the dollar amount or portion of its budget that goes to ranching-related expenses. NPS management of ranching leases places increasing demands on dwindling park budgets, while park improvements, a backlog of maintenance, and public programs and interpretation go unfunded. Scarce park financial resources support 24 ranchers, who benefit from discounted grazing fees, below-market-rate housing, and maintenance and improvements to roads, homes, and farm buildings. They also benefit from implementation of mitigation projects to offset impacts from ranching, all covered at public expense. Ranchings environmental impacts have an untallied economic impact, which the DEIS fails to disclose. The ranchers also benefit from the NPS killing and hazing wildlife. PRNS and GGNRA ranches pay no property taxes. The NPS mission does not include guaranteeing commercial operators a living, yet every alternative except No Action (A) and No Ranching (F) allows diversification for the economic benefit of commercial leaseholders. Our scoping comments also asked NPS to predict the annual costs for each elk management strategy in each alternative. The DEIS fails to address this issue. The DEIS has not disclosed to the public the costs of ranching to taxpayers under alternative B, nor the savings that would accrue under alternative F with cessation of commercial ranching.

#### Failure to Consider Restoration

The NPS has a mandate and an obligation under its management policies (NPS 2006) to not only prevent impairment of park resources and values, but to actually improve natural, cultural, and physical resources and opportunities for enjoyment of the parks for the benefit of future generations. This requires a GMPA for PRNS

and GGNRA that improves these resources. Although more than a century of intensive cattle grazing has altered and diminished the natural ecosystems of PRNS and GGNRA, none of the GMPA alternatives include active, significant restoration of natural resources and natural ecosystems. A coastal prairie restoration alternative, which would maximize restoration of coastal prairie and other native plant and animal communities, was proposed during scoping but not even acknowledged in the DEIS.

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#6950

Name: N/A, N/A

Correspondence: Point Reyes was where I had my first view of the ocean. Beautiful and pristine. Please stop grazing and definitely leave the tule elk alone.

#6951

Name: ELLIOTT, HENRY

Correspondence: Alternative F, including free ranging Tule Elk and the elimination of livestock, should be NPS's Preferred Alternative: 1) It would substantially meet the legal requirements of NPS's founding legislation, subsequent policies and legislative intent for management of biodiversity and cultural resources at the Seashore as reviewed in comments to the DEIR by Carolyn Longstreth. 2) It would be less costly, thus more likely, to meet its requirements of "Appendix D - Management Activity Standards and Mitigation Measures" than all other Alternatives. Such measures have historically been underfunded at the Seashore with prospects for adequate funding of the enhanced requirements for the more involved livestock Alternatives unlikely. 3) Increasing density of free ranging Tule Elk, without or minimal livestock for resource management In the Pastoral Zone, will enable natural processes to restore the historic mosaic of coastal prairie and coastal scrub plant communities. Examples are habitats that have been devoid of livestock grazing for decades in the range of the Pierce Point and Limantour Tule Elk herds. 4) Per CDFW management goals "to emphasize managing tule elk in a free-roaming state to the maximum extent possible, as specified in the Management Plan for the Conservation of Tule Elk (Tule Elk Interagency Task Force 1985)." CDFW ELK CONSERVATION AND MANAGEMENT PLAN - December 2018 Justification for the removal of livestock is analogous to the biological justification by NPS for previous removal of axis and fallow deer at the Seashore: "The FEIS documents that the presence of invasive non-native axis and fallow deer is extremely disruptive to the natural ecosystem at PRNS. Some of the more serious effects these non-native deer have at the Seashore include competition with and displacement of native tule elk and black-tailed deer, the potential for transmitting paratuberculosis (Johnes's disease) and exotic lice to native ungulates, damage to riparian and woodland habitats, and indirect impacts to the native wildlife dependent on this habitat." Non-Native Deer Management Plan/Environmental Impact Statement – 2006. 5) Working ranches are not specifically required for maintaining the historic fabric of the areas' historic districts. Indeed, proposed ranch stocking operations and Best Management Practices are for the 21st Century, not the past two centuries that is the intent of establishing these districts. In Alternative F, livestock are only to be present as a necessary, short-term resource management tool to enhance plant community structure and biodiversity.

#6952

Name: Pieterse, Edwin

Correspondence: Please respect the rights of animals to be treated well !!!

#6953



Name: N/A, N/A

Correspondence:

Dear Superintendent, Sept. 23, 2019

Enclosed are comments on the Draft Environmental Statement (DEIS) for the General Management Plan Amendment process (GMP) for the Point Reyes National Seashore (PRNS).

#### Adequacy of DEIS and Appendices

DEIS page ii - Executive Summary - The Site Specific Analysis in the Vegetation Management section should be expanded to include specific restoration plans for habitats within the program planning area. Alternatively, another provision for a PRNS Habitat Restoration Plan(s) would benefit the Final EIS. This should include serpentine, coastal prairie, riparian, and wetlands. The description of dune habitat, restoration and species is excellent. I hope NPS can continue this excellent program.

DEIS - page vii - Executive Summary - The DEIS is not adequate in stating which wildlife will be positively or negatively impacted by various habitat restoration activities. Please give at least one example of a species that would benefit and one that would be detrimentally affected by the habitat restoration and protection strategies that exist and are proposed.

DEIS General - The DEIS is not adequate in describing Site Specific Restoration Analysis for coastal prairie. Arguably, coastal prairie habitat is one of the most popular in PRNS. I have experienced the crowds of enthusiastic wild flower viewers at Chimney Rock for decades.

I realize Chimney Rock is not in the Planning Area. However, coastal prairie remnants and the diversity of this habitat (coastal mesas, wet meadows, etc.) are mentioned in various ranch descriptions in the Planning Area. As stated in the DEIS, page 92 Ranches in the planning area encompass large portions of the coastal prairie ecotype. And ..coastal California grasslands are disturbance dependent and can convert to shrub land.(page 22) The integration and back and forth transitions of coastal prairie and coastal scrub need further understanding.

As stated in the DEIS, California coastal prairie has twice the number of species as other Western US grasslands. It is a unique, ecologically important and beautiful habitat. The DEIS is not adequate in describing any aspect of coastal prairie habitat restoration. For coastal prairie habitat to persist and thrive, the small remnants need to be enlarged and development of a larger, contiguous area would benefit the plants in this community as well as insects, birds, mammals and other taxa.

DEIS: page 11 - Range Management and page. - The coastal grassland section of the Point Reyes Natural Resource Condition Assessment (NPS 2019a) conducted between 1987 and 2011 to monitor spring vegetation composition is limited as it is under review. DEIS page 73: The Point Reyes Natural Resource Condition Assessment (NPS 2019a) is cited again with the following information : &analysis of 51 plots in Point Reyes grazed coastal grassland from 1988 to 2013 showed Coyote brush occurred in about half the plots. It increased in cover in 10 of the plots, 6 of them to a major degree, and decreased in cover on 8, although in some plots, cattle grazing ceased. The plots did not capture the full range of sites and vegetation. (NPS 2019a). While this study is inadequate to describe the composition and changes in the grasslands in the Planning Area, it is very valuable for use in designing a restoration study of coastal prairie and coastal scrub integration and their transitions and integrations. For example, it could be used to determine sample size, the number of replicates needed for each grassland type, and factors to consider in the restoration study. This and some other recent publications on central California coastal prairie restoration would enable addition of a Site Specific Analysis of coastal prairie restoration plan to be added to the Final EIS. (Example: Henneman, C., N.E. Seavy, T. Gardali. 2014. Restoring Native Perennial Grasses by Changing Grazing Practices in Central Coastal California. Ecological Restoration. 32:4. 352-354.)

DEIS: page 25 - Alternative B - Alternative B is identified as the preferred alternative by the NPS. The DEIS is not adequate in stating why this is the preferred alternative. The Final EIS would benefit from a rationale for Alternative B as the preferred alternative.

DEIS page 118 - Coastal Dune Restoration - This is an excellent program, please continue this program and apply what is useful to other habitat restoration programs.

DEIS page 129 to 132 - Environmental Consequences - Alternative A - Published literature on the benefits and impacts of grazing on Planning Area Federally Listed plants is complex, not definitive, positive for some species for certain duration, time of year, intensity of grazing and detrimental to other species. A well designed, adequately replicated study on grazing effects on the Federally Listed Plants and their habitats would contribute much to the Final EIS for the Planning Area. The lack of knowledge and understanding of grazing impacts on these species and their habitats strongly suggests a thorough study is needed. The DEIS does not contain adequate information, but I realize, much information may not exist. As this section of the Environmental Consequences states and the knowledge cited applies to all Alternatives, A, B, C, D, and E, Site Specific Restoration Analysis for these species and their habitats would increase the adequacy of the Final EIS. If Site Specific Analysis is not the appropriate mechanism for this addition to the Final EIS, provision for a PRNS, Site Specific Habitat Restoration Plans for Federally Listed Species should be added to the Final EIS in a way that is appropriate for the GMP.

DEIS - General question - While the fenced enclosure on Tomales Point, where the enclosed elk herd are located, is not in the planning area, have there been any studies on plant community changes there since the elk were re-introduced? If so, this information may be useful to the Tule Elk Management section of the Final EIS and for development of coastal prairie and coastal scrub restoration plans.

Appendix A - General: Resource Protection Zones habitat maps of individual ranches are inadequate. The specific protected habitats on the individual ranch maps are needed and would benefit the Final EIS.

Appendix A: Figures 8 to 31, (Pages A-9 to A-32). The general nature of the individual ranch maps showing the proposed Ranchland Subzone, Pasture Subzone, and Resource Protection Subzone is not adequate. The individual ranch maps should include serpentine, remnant coastal prairie areas, riparian, wetlands, and rare plant location and distribution. This would enable public comments on restoration strategies relative to ranchland management, to better understand where specific protected resources are located, to recommend restoration concepts for ecological connectivity and processes, and to comment on protection strategies, impacts and benefits. This information would benefit the Final EIS.

Appendix A: Vegetation map - Figure 44 (page A-45) - Where is the coastal prairie (all subtypes) located in the Planning Area? How many acres of coastal prairie remain in the planning area?

Appendix A: Wetland Map - Figure 45 (page A-46) - Addition to the legend of specific types of palustrine wetlands such as wet meadows, riparian, streams, seeps, etc. would benefit the Final EIS. For example, what type of large wetland is adjacent to the southern end of Abbotts Lagoon?

Appendix A: Figure 43, (page A-45) - Another area where coastal prairie information is not adequate is Appendix A, figure 43. The coastal prairie habitat and where it is known to occur should be included in this figure or a separate figure could be prepared. Grassland/pasture is not an adequate description of the grassland habitats in the Planning Area.

Appendix D: Table D-1, page D-4, section Vegetation Management - Upland and Vegetation Management and Planting - establishing native grasses, forbs, shrubs or trees in disturbed or eroding areas is another area where a Site Specific Restoration analysis, or other appropriate provision, would greatly benefit the Final EIS.

Appendix I: page I-12 - Forage Model. On this page the supplemental feed required for the livestock on Ranch C and D West states the 4. supplemental feed required for cattle is 631,000 /- 88,000 lbs. The aggregate supplemental

feed and the amount of fall/winter feed (DEIS page 10-12) required by all the ranches in the Program Planning Area should be included in the final EIS or the Appendices. The total elk forage consumption, not just that from C Ranch should also be given. The information given on supplemental feed is not adequate to understand the number of cows that could be supported in the Range Subzone and Pasture Subzone of the Planning Area without importation of supplemental and/or fall/winter feed.

Appendix K: page 58 - Rare Plant Monitoring - This program would benefit from designation as a dedicated program, not an opportunistic one. PRNS has many rare plants. They deserve a designated program with monitoring and restoration component in the Site Specific Analysis of the Final EIS and Appendices or elsewhere in the Final EIS as appropriate to NPS methods.

Appendix K: page 59 - Section 7.3.2 - populations of Marin Dwarf Flax, *Hesperolinon congestum*, and Tiburon Indian paintbrush, *Castilleja affinis* ssp. *neglecta*, would benefit from continued monitoring, as recommended by USFWS Biological Assessment.

Appendix K: pages 59-60 - Section 7.3.3 - As native species of the coastal prairie habitat now compete with a large number of non-native annual grasses and forbs and grazing is known to benefit some and impact other native species, the final EIS should contain a restoration strategy for some areas of coastal prairie using prescribed grazing and possibly other disturbances. This would likely be an experimental program with adequate sample sites, control sites and replication, to understand the effects of grazing, fire, and other disturbances on coastal prairie as well as its integration with coastal scrub habitats. The importance of a greater number of sites with coastal prairie habitat and one or more larger contiguous areas is essential for this habitat to persist and thrive in the Planning Area. The other species associated with coastal prairie would also benefit as would the Final EIS.

#### An Alternative

I recommend adoption of Alternatives D and E for the following reasons: " Alternative D: Alternative D would contribute meaningful beneficial impacts on soils compared existing conditions for an additional 8400 acres that would be included in the Resource Protection Zone because ranching related soil impacts would cease in those area. " Alternative D: Water resources and water quality in areas removed from ranching would improve compared to existing conditions. " Alternative E: Reduction of the animal units and forage production fields with conversion of dairy to beef would have noticeable long- term beneficial impacts on the soil by reducing erosion, runoff, and compaction. " Alternative E: Eliminating manure spreading and nutrient management on 2500 acres would have long term, beneficial impacts on soil fertility because soil fertility would slowly over years or decades return to natural conditions. Water resources and water quality would also benefit. " Alternative E: Cumulative, noticeable, long term, beneficial impacts compared to existing conditions from conversion of dairy to beef cattle operations include elimination of manure management systems, seeding, forage production, and diversification activities.

Alternatives D and E offer the most appropriate ranchlands management as they provide noticeable, long-term, beneficial impacts to PRNS resources and ranch operations. Cumulative impacts of alternatives A, B, and C are all adverse to soils and water resources when considering impacts from past, present and reasonably foreseeable actions. Forage production and continual reintroduction of invasive species will cease. Some range degradation will decrease in areas removed from grazing and conversion of dairy ranches to beef ranches. These benefits include reduced polluted runoff, sheet and gully erosion, and soil instability. There is a detrimental impact to the people who lease, work and live on the ranches identified in Alternatives D and E.

However, taken together, Alternatives D and E, will provide 19,000 acres of grazing lands in the Planning Area, an essential component to managing PRNS grassland and shrub land as well as providing for continued ranch operations. Soils and water resources will be beneficially impacted overall as there will be fewer acres subject to grazing and intensive use. An overall benefit to water resources results from less water use for livestock. The larger area of Resource Protection Zone will preserve more sensitive habitats and species.

Public use trails may increase. A trail through a coastal prairie restoration project would benefit PRNS. This could be done as an educational trail, showing restoration processes, providing employment and volunteer activities.

Diversification of ranching activities would not be adopted. No other livestock species and other proposed activities would be allowed. These uses and activities are not appropriate in a National Park.

Historic structures in the Ranch Core Subzone will be preserved and restored in Alternatives D and E. NPS has identified the need for substantial capital investment in many of the historic structures and will collaborate with volunteer groups and the ranchers to complete and maintain these improvements.

Thank you for the opportunity to comment.

#6954

Name: Morey, Adrienne

Correspondence: I am writing to urge the National Park Service to discontinue the grazing of beef and dairy cattle at Point Reyes National Seashore. This precious area has been damaged by livestock grazing which poses a threat to the environment and local wildlife and it should be protected and used to serve the public good, and not for the benefit of the livestock industry.

I strongly oppose Option B and any other proposal that would be fatal to Tule Elk or other wildlife to the benefit of ranching operations, and encourage the agency to adopt Option F to discontinue grazing and allow members of the public to enjoy this beautiful park and to be enriched with opportunities to visit and appreciate this special place.

#6955

Name: Nobari, Nassim

Correspondence: I am writing to urge the National Park Service to discontinue the grazing of beef and dairy cattle at Point Reyes National Seashore. This precious area has been damaged by livestock grazing which poses a threat to the environment and local wildlife and it should be protected and used to serve the public good, and not for the benefit of the livestock industry.

I strongly oppose Option B and any other proposal that would be fatal to Tule Elk or other wildlife to the benefit of ranching operations, and encourage the agency to adopt Option F to discontinue grazing and allow members of the public to enjoy this beautiful park and to be enriched with opportunities to visit and appreciate this special place.

#6956

Name: Crosby, Marlene

Correspondence: President Trump you should be ashamed of yourself. You do not know & understand what you are doing. You obviously don't care. But many Americans do. Stop your assault on wildlife, Endangered Species & quit "bowing down" to all your constituents who are lining your pockets. Wildlife are beings also and deserve to be treated as such. Start using your brain & quit thinking about how you will benefit from your actions!!!!!!

#6957

Name: Baty, Sherry

Correspondence: Superintendent Ciceley Muldoon Point Reyes National Seashore 1 Bear Valley Road Point Reyes CA 94956

Dear Ciceley,

I am disappointed with the Park's preferred option for the Ranch Management Plan. I feel it gives far too much to the ranching and agricultural interests and fails to protect the very things that make the Seashore the special place that it is.

The proposed diversification in the preferred alternative will have a hugely detrimental effect on the the wildlife and recreation in the Park. Predator controls will badly effect the freedoms of both wildlife and park visitors who want the explore the wild places in the pastoral zone. They will probably have fatal consequences for countless coyotes, foxes, bobcats, raccoons, and red-tail hawks. Visual landscapes will be adversely altered as well.

In my perspective, the Park has been quite lax in managing the ranches as they are today. The current level of beef and dairy ranching already puts an undue strain on the Park's natural systems as well as on Park administration. Rather than compounding these problems with increased agricultural uses, I would ask that the Park use this management opportunity to bring the ranch leases back into line with the primary Point Reyes National Seashore purpose and values: preserving the natural environment and fostering recreational activities. Let the historic beef and dairy ranching continue, but with the broader recognition that this is a National Park on the coast and deserves much greater degrees of protection than it is receiving today.

Thank you and your staff for your ongoing efforts in these trying political times.

Sincerely, Sherry M Baty

#6958

Name: N/A, N/A

Correspondence: I oppose the National Park Service plan to kill native Tule elk, grow commercial crops, and permit ranchers to add chickens, turkeys, sheep, pigs, and goats to their operations. For this reason, I support Alternative F.

As national park land, this property was specifically set aside to protect, restore, and preserve the natural environment including the wild animals who live there. The original intention was to phase out dairy and cattle ranching, not add more crops or animals to increase ranching profits.

The proposed plan does not address the damage from grazing, including water-quality degradation and soil erosion. Also, adding new crops will create more conflicts with, and reduce habitat for, native wild animals.

I quote below, two of the primary goals of the management plan, as described in Table 2 of the EIS document:

Habitats and populations of threatened and endangered species, special-status, and rare species persist and are improved. Native plant and animal communities persist and thrive.

It is difficult to understand how the NPS can argue in good faith that Alternatives B-E are consistent with those goals.

The NPS should also consider recreational and educational opportunities that could be provided by working ranches, if Alternative F is not selected. One possibility is that ranching leases could have a required educational or recreational aspect, which would require ranches to provide educational programs or access opportunities for visitors to learn about historic ranching practices in the Seashore. Without such provisions, the NPS is just closing off public space for private benefit.

#6959

Name: N/A, N/A

Correspondence: I travel the Bolinas Fairfax road frequently to reach the Meadow Club. While the posted speed

limit is 25 MPH, bikers traveling downhill often reach speeds of 40 MPH coming down the steep hilly decline. Bikers travel close to the midline of the road and also tailgate a car observing the speed limit. This practice is extremely dangerous and never in the past 10 years have I seen a police ticket such behavior or even post speeds directly to bikers. Please post and patrol this road to educate bikers to safety on this road.

#6960

Name: Vogt, Suzanne

Correspondence: The plan to shoot elk is a horrendous idea. The elk deserve to be on public lands as much, if not more than the cattle grazing there. The plan would allow conversion of park grasslands to artichoke farms and row crops and let ranchers introduce sheep, goats, chickens and pigs - a recipe for even more conflict with native wildlife.

#6961

Name: Wilburn, Patricia

Correspondence: After the elk were reestablished at Pt. Reyes National Seashore they were severely neglected during the decade long drought that California suffered and many died of thirst. Couldn't we have provided water to the herd in troughs like we do for cattle? Now after all they've endured we are planning to shoot them. Please reconsider this measure and work together with conservationists to find a better, more sustainable way to manage the herd going forward.

#6962

Name: Karlson, Fred

Correspondence: Tule elk should not be shot on public lands to protect the interests of private livestock owners. This is a terrible ruling that only benefits a specific class of people. It goes against the common good.

#6963

Name: Smith, Julia

Correspondence: I am writing to implore you to protect the tule elk at Point Reyes National Seashore. We too often put economic interests of humans before anything else. These elk are a natural treasure that cannot be replaced. They are native to the land, and are an essential part of the ecosystem. We need to stop destroying ecosystems in the name of agriculture and money. Once we lose a species, there's no going back. Please consider the health of our planet and of the native species who deserve to thrive.

#6964

Name: Milford, Mona

Correspondence: Cattle do not belong in the wild lands. The Tule Elk are amazing and need to be protected on their land. Quit selling off the things we Californians love and respect for greed. The Tule Elk are priceless, keep them safe and wild

#6965

Name: Levesque, Merrilee

Correspondence: I would like to see you adopt Alternative F. The use of public land for grazing needs to be phased out as the demand for dairy is dropping significantly and hopefully land requirements for cattle grazing will also be less as non-meat protein alternatives continue to become more accepted. Citizens should have the ability to visit more public areas since our taxes make them "ours". Thank you.

#6966

Name: Stewart, Robin

Correspondence: I am writing to urge the National Park Service to discontinue the grazing of beef and dairy cattle at Point Reyes National Seashore. This precious area has been damaged by livestock grazing which poses a threat to the environment and local wildlife and it should be protected and used to serve the public good, and not for the benefit of the livestock industry.

I strongly oppose Option B and any other proposal that would be fatal to Tule Elk or other wildlife to the benefit of ranching operations, and encourage the agency to adopt Option F to discontinue grazing and allow members of the public to enjoy this beautiful park and to be enriched with opportunities to visit and appreciate this special place.

#6967

Name: Alonzo, Leo

Correspondence: I am writing to urge the National Park Service to discontinue the grazing of beef and dairy cattle at Point Reyes National Seashore. This precious area has been damaged by livestock grazing which poses a threat to the environment and local wildlife and it should be protected and used to serve the public good, and not for the benefit of the livestock industry.

I strongly oppose Option B and any other proposal that would be fatal to Tule Elk or other wildlife to the benefit of ranching operations, and encourage the agency to adopt Option F to discontinue grazing and allow members of the public to enjoy this beautiful park and to be enriched with opportunities to visit and appreciate this special place. Ms. Leo E. Alonzo

#6968

Name: Knight, Anthony

Correspondence: Dear Sirs:

I would like to raise my voice to join others who oppose expansion of commercial development in Point Reyes National Seashore. As had been pointed out innumerable times, I feel that a National Park or Seashore is not a place where private personal gain, such as ranching, should be encouraged - - but rather a place where preservation of the environment and protection of wildlife should take top priority.

The dairy industry dominates the Marin County landscape, and for that matter, landscapes everywhere. There are ample opportunities for ranchers to carry on their industry outside of parks. The point of the parks is to preserve just a small piece of the natural landscape without the degradation which accompanies cattle raising.

The tule elk are now part of the natural habitat - - whether or not they are a historic part of it. They should not be "culled" under the argument that they take away feed from cattle. The cattle, in my view, have no business there - - and the elk do. Cull the ranches, do not extend leases. Give us back this beautiful landscape.

#6969

Name: Frandsen, Michelle

Correspondence: Hello,

I am a frequent visitor to Pt. Reyes National Seashore. It is a very special place with all of the biodiversity and wildlife that exists there. It is truly a national treasure. We are very lucky to have had this area established as a National Park.

I am very concerned with a number of aspects of the current proposal.

### Culling Elk and New Use

Firstly, I am absolutely opposed to the culling of elk. Especially because the reason behind the culling is that they are competing for grass with cattle. I would like to see data that should show how culling the elk would actually settle the conflict. I go to the park often to watch the elk and photograph them with my daughter who is studying photography. These elk are native and should be protected.

The cattle are not native and I don't think they should be raised within the park and that the rancher leases should not be renewed. These ranchers have been paid for their land and have been given ample time to locate elsewhere. Given that they are currently still within the park however, at a bare minimum we should not be expanding their leases in any way. I certainly do not agree with the idea to allow the ranchers to grow row crops. This will set up further conflicts between ranchers and wildlife. This park was purchased for the American people, not to provide ranchers with land to lease for their cattle or any other use.

I would like to understand how it is that funding will be available to pay for the additional park personnel that will be needed to manage the new use. You need to provide analysis of the actual habitat loss and the impact of increased fencing. We need to understand how the use of pesticides will impact bees, butterflies, insects and birds. As someone who grew up farming in Wisconsin, I know first hand that there will be many impacts including an increase in the rodent population which will alter the balance in the park and adversely impact the wildlife.

Again, you should provide us with the specifics of a formal management plan that outlines the numbers of employees and the responsibilities and activities that will need to be regularly conducted to support what has been proposed in the plan.

As I said before, as a visitor, I don't want the ranchers using our park. I don't want my experience in the park to be changed as additional cattle turn grassy fields into dry dust. I don't want this pristine landscape further marred by farming. I am also very concerned about the impact the additional commercial traffic will have to wildlife, visitors and what it will do to the roads. We need to understand all of this and have the costs and funding sources laid out in full detail.

New Farm Animals You also need to provide us with an analysis of predator species that will prey on the new farm animals being proposed. What are the specific costs associated with the management? Why aren't you proposing that cow numbers decrease to compensate for the increase in other animals? Where will the pig urine go and how will that impact the land and water around them? Provide us with a specific plan, costs and analysis. As I mentioned before, these new animals will cause conflict with the existing wildlife. This park was established for the preservation of the land, plants and native wildlife. It is not the responsibility of the NPS or the American tax payers to ensure profitability of the ranchers. We should not be subsidizing their ranching. These diversification strategies should not be allowed for any reason. The long term result of implementing these strategies will be detrimental to the land and wildlife and will eventually lead to less visitors and donations to the park. Please do not move forward with any of this proposed plan. It will further destroy the beauty of the park and undermine its purpose for existing in the first place.

#6970

Name: Lease, Ariana

Correspondence: It makes me sick to my stomach that the NPS is considering the lethal elimination of Tule Elk for the benefit of ranchers. These elk have the ecological right to the land, and are the reason so many people visit Pt Reyes at all. These actions reflect terribly on the NPS, an organization I have found to have ecology and natural resources as a top priority. It goes against the mission of the NPS. As stated by the Sierra Club, "All the ranching alternatives in the Draft Environmental Impact Statement involve the impairment of natural resources. Three National Park Service laws prohibit actions that will impair natural resources (the 1916 NPS Organic Act, Point



Reyes National Seashore legislation Section 459c-6, and Golden Gate National Recreation Area legislation Section 460bb). Consequently, the Park Service should prepare a supplemental DEIS with ranching alternatives that comply with applicable laws requiring the protection of natural resources. The Park Service should then circulate that supplemental DEIS for public comment."

#6971

Name: Harris, Brent

Correspondence: As a 35-year resident of West Marin and a frequent cyclist I am elated by the proposals to increase access and connectivity for cyclists in the National Seashore. The existing smattering of routes accessible for off-road cycling is, with the exception of the Bolinas Ridge, McCurdy, O.V.T. Randall loop, fragmentary and consists of very short sections of trail. Cyclists must either drive to the trailheads or ride long sections of pavement to get from one short section to another.

Please consider the following list of new routes:

1. From the top of Olema Hill, across the highway from the Bolinas Ridge Trail, to Point Reyes Station. As a resident of Point Reyes Station I would use this connector weekly.
2. From Bolinas Ridge to Five Brooks. The old Lupton Ranch Road used to provide this connection but the upper section of it has disappeared from lack of ranch use in the past decade. This route will provide connection between the greater trail system that ties into Bolinas Ridge and both the Olema Valley Trail and the dirt road to Wildcat Beach.
3. From Devils Gulch to Platform Bridge Road. A new connector here would provide numerous possibilities for those who are riding on the Cross-Marin Trail, Devil's Gulch Trail, Jewell Trail, Shafter Fire Road, and The Bolinas Ridge.
4. From Abbot's Lagoon to Drake's Estero. This would provide both a much longer ride for those who are riding out and back from the Abbot's parking lot, and a road/off-road loop for the more adventurous.
5. A connector from Pierce Point Road to the Marshall Beach trailhead would further increase the possibilities in the area of the Abbot's Lagoon Drake's Estero route mentioned above.
6. Speaking of Drake's Estero, some sort of loop trail from the Drake's Estero trailhead on the ranch roads in the area would provide a nice shorter ride in some beautiful countryside.

I would encourage the use of existing ranch roads where possible for these new routes. I think that the decades-old experience on Bolinas Ridge has taught us that ranching, hiking, and bicycling can coexist when the fences, gates, and education are adequate. I am no expert on cows, except from the standpoint of someone who has bicycled past them on Bolinas Ridge scores of times, so I would encourage soliciting the input of the ranchers on how to best manage the cow/visitor interface.

Thank you.

#6972

Name: McSwigan, Melissa

Correspondence: Regarding the Elk at Point Reyes Park, I support Alternative F, which would discontinue farming and ranching opportunities in the park and expand visitor opportunities. Grazing negatively affects ecosystems, causing water pollution and soil erosion, spreading invasive species and disease, and harming endangered species. Thank you.

#6973

Name: Bruns, Trisha

Correspondence: I am writing to urge the National Park Service to discontinue the grazing of beef and dairy cattle at Point Reyes National Seashore. This precious area has been damaged by livestock grazing which poses a threat to the environment and local wildlife and it should be protected and used to serve the public good, and not for the benefit of the livestock industry.

I strongly oppose Option B and any other proposal that would be fatal to Tule Elk or other wildlife to the benefit of ranching operations, and encourage the agency to adopt Option F to discontinue grazing and allow members of the public to enjoy this beautiful park and to be enriched with opportunities to visit and appreciate this special place.

#6974

Name: Montoro, Ernest

Correspondence: Please use alternative plan F.

#6975

Name: Sievers, Victoria

Correspondence: Please do not allow increased access to biking in the National Seashore. The area is used to its maximum with respect to wildlife management, care for the environment, peaceful hiking, and fire safety/evacuation

#6976

Name: Levy, Diane

Correspondence: Ranching in the National Park has compromised the water quality of the surrounded streams with waste run off into the bays and ocean. This is not wilderness protection as the park is called to do. The Tule Elk are native and should be protected, the cattle aren't.

#6977

Name: Levy, Claire

Correspondence: I am writing to urge the National Park Service to discontinue the grazing of beef and dairy cattle at Point Reyes National Seashore. This precious area has been damaged by livestock grazing which poses a threat to the environment and local wildlife and it should be protected and used to serve the public good, and not for the benefit of the livestock industry.

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#6978

Name: N/A, N/A

Correspondence: I do not support granting 20 year leases to cattle and dairy industry. Climate science has indicated we have less than 12 years to mitigate the worst of climate catastrophe. Allowing business that has been linked to water pollution, species extinction and in Point Reyes is the culprit of over 60% of the greenhouse gas emissions, it is not a good idea to give that same industry a 20-year lease to continue degrading our national park. Point Reyes is a refuge to thousands of plants and animals. Point Reyes can be a leader in the fight for climate

justice, and it starts with phasing out Beef and Dairy operations and restoring the land to its natural state. The EIS has NO MENTION of the effects of climate change in it, and does not include any information of the cattle and dairy's impact on climate change within the park.

#6979

Name: GAMBRILL, EILEEN

Correspondence: Pt Reyes is a treasure put aside legally for residents to enjoy not to be foul for the economic gain of a few

Please do the right thing- adopt prop F.

#6980

Name: Sorensen, Margery

Correspondence: Do not extend the cattle grazing leases on the Point Reyes National Seashore. I was privileged to visit this beautiful area a few years ago and found it captivating! We need less livestock and more protected space for native wildlife. Please protect this special area and get the cattle out of there!!

Sincere thanks! Margery Sorensen

#6981

Name: Oates, Stori

Correspondence: September 23, 2019

Cicely Muldoon, Superintendent Point Reyes National Seashore 1 Bear Valley Road Point Reyes, CA 94956

RE: No to NPS Preferred Alternative, Alternative B

Dear Superintendent Muldoon,

Thank you for the opportunity to submit comments on the Draft Environmental Impact Statement (DEIS) for a General Management Plan Amendment (GMPA) for Point Reyes National Seashore and the North District of Golden Gate National Recreation Area.

I am a wildlife biologist, educator, and outdoor enthusiast. I oppose the NPS Preferred Alternative, Alternative B, because it proposes management actions that are not permissible under NPS Management Policies; that would impair park resources; that would have significant environmental consequences and impacts; and which are incompletely or inadequately analyzed in the DEIS. In addition, some of the proposed mitigation measures would themselves impair park resources, or have foreseeable consequences which are not adequately analyzed.

Many of the impacts on, and impairment of, park resources stem from the proposed action of allowing diversification of ranching activities. The stated purpose of the proposed action is to allow "ranchers to react to poor forage production years and fluctuations in the economic market." (DEIS, page 20). Management actions whose purpose is to promote or protect the economic interests of leaseholders are not legitimate because they are fundamentally at odds with the mandates of the Organic Act of 1916, the PRNS enabling legislation, and current NPS Management Policies.

The DEIS does not specify any Need for Action or Desired Condition that would be met by diversification. On the contrary, the DEIS, in Alternatives Considered but Dismissed from Further Analysis, specifies that diversification of livestock to species other than beef and dairy cattle "...would have too great of an environmental impact" if the diversified species were ducks, geese, turkeys, or rabbits. (DEIS, page 60). The adverse effects from those species

include “. . . potential increase in predation; disease or parasites; loss or degradation of habitat; construction of additional infrastructure (e.g. watering facilities, feed storage facilities, and pens); or the need for the use of non-wildlife friendly fencing.” (DEIS, page 60). Those same adverse effects can also be associated with diversification to chickens, sheep, pigs, goats, and even row crops, all of which would be allowed. The DEIS fails to explain how the very same adverse environmental impacts are “too great” on the one hand while on the other they would have no impacts, or impacts that can be adequately mitigated.

Specific significant impacts and foreseeable consequences of diversification not adequately analyzed in the DEIS include:

**Impairment of Wildlife Resources.** The DEIS states that “[m]anagement of any predators associated with new livestock species would not be allowed,” a demonstrably false statement given that the very next sentence says that “[g]uard animals (i.e. dogs, llamas, donkeys) would be allowed. . .” [DEIS, page 38]. The use of guard animals is a form of predator management. Similarly, the DEIS states that “[m]anagement of any wildlife associated with protection of row crops would not be allowed in the planning area: however, ranchers would be allowed to fence row crops to exclude wildlife.” [DEIS, page 38]. Exclusionary fencing is a form of wildlife management.

Appendix D includes a number of other wildlife and predator management strategies, techniques, and equipment that would be allowed in connection with diversification. These include: parking a vehicle in an area of loss by predation [page D-39] and repellents and frightening devices [page D-39] in addition to exclusionary fencing and guard animals.

Statements that wildlife and predator management will not be allowed in connection with diversification are plainly untrue, and the DEIS does not analyze the significant impacts that the proposed actions will have on park wildlife resources. Predators such as coyotes, bobcats, foxes, and badgers, for example, will have reduced hunting areas and opportunities, and will come into conflict with guard animals. Their movement patterns will be disrupted. The DEIS should analyze these foreseeable significant impacts, and determine if they collectively constitute impairment of park resources. The DEIS should also analyze the cumulative impacts on wildlife of all diversification proposals that are likely to be approved, in addition to the impacts from individual proposals.

**Impacts on Visitor Use and Enjoyment and Scenic Values.** The DEIS notes that diversification activities, including new types of livestock, row crops, new fencing, and other new infrastructure would result in adverse impacts to visitors use and enjoyment opportunities, and to scenic values [DEIS, page 168]. The DEIS does not analyze or mitigate for these impacts, either individually from the various ranches, or cumulatively from all diversification activities that could be approved.

Other impacts not fully analyzed or adequately mitigated for in the Preferred Alternative include:

Livestock that escape from ranch boundaries can have significant impacts on sensitive park resources. On numerous occasions over an extended period of years, we have observed, documented, and reported to park management the impacts of cattle in and around Abbotts Lagoon, for example. Cattle that had escaped from ranchlands blocked trails, defecated in and around the lagoon, trampled vegetation, and impeded the movement of wildlife. The Ranch Operating Agreements should contain an explicit provision requiring the ranch operator to retrieve escaped livestock as soon as possible (within 24 hours). Failure to do so should result in the cattle being treated as trespass or feral livestock in accordance with NPS Management Policy 8.6.8.3.

The impacts of Development to Support Day Use and Overnight Accommodations are not analyzed or adequately mitigated and may cause impair of park resources. For example boat-in camp sites on Schooner Bay [DEIS, page 32] foreseeably will have significant impacts on the wilderness area of Drakes Estero, due to trash, human waste, and substantially increased visitor usage, as has happened at boat-in campsites on the west shore of Tomales Bay. Migratory birds and marine mammals will also be negatively affected. The DEIS includes no quantitative or descriptive details of any kind regarding boat-in camping that would allow analysis of, or mitigation for, its impacts.

Impacts to Water Resources are not adequately analyzed because the DEIS contains no meaningful quantitative data on water quality. The DEIS states that “. . .existing conditions serve as baseline against which the impacts of each action alternative are compared.” [DEIS, page 112]. However, the existing conditions are not described in quantitative or detailed manner. Pursuant to NPS Management Policy 4.6.3, NPS must “take all necessary actions to maintain or restore the quality of surface waters and groundwaters within the parks. . .” Under that standard, if the existing condition of any surface or groundwater in the planning area is impaired, a proposed action alternative should restore water quality, not maintain a baseline impairment. The DEIS is deficient in not identifying existing impairments to water resources.

The native tule elk are a park wildlife resource that should only be managed for the benefit and non-impairment of the resource, not for the economic benefit of commercial leaseholders.

The Draft Foundation Document rightly places ranching within the context of a 5,000-year continuum of human use of the Point Reyes landscape. In contrast, the NPS Preferred Alternative, Alternative B, attempts to put all of the Park's Fundamental Resources and Values squarely in the context of ranching. As a result, the DEIS ignores or glosses over significant impacts that will foreseeably result, individually and cumulatively, from the proposed actions. I ask that NPS develop and analyze a new alternative that mitigates impacts from current ranching activities, eliminates activities that impair park resources, and does not expand the agricultural activities beyond the present multigenerational ranching and dairying.

Thank you for the opportunity to comment on the Draft Environmental Impact Statement for the GMPA.

Sincerely,

Stori Oates

#6982

Name: Davis, Melissa

Correspondence: I am writing to urge the National Park Service to discontinue the grazing of beef and dairy cattle at Point Reyes National Seashore. This precious area has been damaged by livestock grazing which poses a threat to the environment and local wildlife and it should be protected and used to serve the public good, and not for the benefit of the livestock industry.

I strongly oppose Option B and any other proposal that would be fatal to Tule Elk or other wildlife to the benefit of ranching operations, and encourage the agency to adopt Option F to discontinue grazing and allow members of the public to enjoy this beautiful park and to be enriched with opportunities to visit and appreciate this special place.

#6983

Name: Bortolotto, Elizabeth

Correspondence: I strongly oppose killing elk so that cattle ranches can operate. I also strongly oppose long leases to cattle ranches. Climate change is a pressing event and farmed animals are one of the major causes. Elk are native, cattle are not!!! I would really like to see complete restoration of this area to wild conditions.

#6984

Name: Schlickman, Andrew

Correspondence: September 23, 2019

Dear Superintendent,

Thank you for the opportunity to comment on the draft Environmental Impact Statement for the Point Reyes General Management Plan Amendment (Draft EIS).

### My Connection to Point Reyes

My name is Andrew Schlickman, and I live in Evanston, Illinois. I have been visiting and exploring Point Reyes National Seashore since 1974. Since, then, I have visited Point Reyes at least 20 times. I have hiked many of the trails and beaches there, and I have witnessed abundant and diverse wildlife, including bobcat, Tule elk, sea lion, and harbor seal, and dozens of species of birds and waterfowl. I look forward to continuing to visit the park over the upcoming years.

I have had many special experiences during my visits to Point Reyes. In 1976 I witnessed for the first time migrating whales in the ocean from the headlands above the lighthouse. In 2003 I kayaked Tomales Bay and paddled from Marshall to the beach at the mouth of White Gulch. We were accompanied by harbor seals, and we witnessed a herd of Tule elk at White Gulch. A few years later I drove in the fog and wind along the road to Pierce Point Ranch. Out of the mist appeared dozens of Tule elk; I felt like I had been transported back 200 years in time. Just a few years ago, I watched at sunset as a bobcat quietly crouched through a meadow looking for food, and then pounced on a rodent it trapped. I will never forget these special moments, and the park should be managed in such a way that other visitors will have the opportunity to experience what I have seen and felt there, without interference from activities that detract from the natural beauty and ecological magnificence of the place.

Unless otherwise stated, all references to Point Reyes should be deemed to include both Pt. Reyes National Seashore and the north unit of Golden Gate National Recreation Area.

### My General comments on Draft EIS

Since my first visit to Point Reyes, it has been my understanding that over time the ranching and dairy activities (hereinafter just ranching) in the park would gradually be phased out. I recall being told by park personnel that the ranches would continue to exist for a reasonable and limited period of time as long as they continue to be owned, managed and operated by the families who were there when the park was established, but that they would not be there indefinitely. I continue to be surprised that the ranches are still there - over 40 years after my first visit and over 60 years after the park was first established. Point Reyes is a national park and should be treated like our other treasures in the national park system.

Ranching is a relatively new activity on Point Reyes, and NPS should be seeking to restore, preserve and make accessible to the public the environment and ecosystem that thrived on Point Reyes for the hundreds and thousands of years before European immigrants came to the area. The overall goal should be to restore the park, as much as possible, to the condition in which it existed before the mid-1800s. The ranching operations should be given a reasonable time frame in which to wind down, and the hardships to the families who continue to live and actively ranch in the Park should be minimized, but this should have been done during the first few decades after the Park was established, not 60 years later. Such a phase-out should now be a high priority. To the extent there is tension between the goals for the park and the requirements of the National Historic Preservation Act, all doubts and inconsistencies should be resolved in favor of restoration and ecologically sensitive management.

### Alternative F Should be the Preferred Alternative

Of the six alternatives set forth in the Draft EIS, Alt. F should be the one that is implemented in the General Management Plan. It is far superior to the other alternatives. Alternative F would come closest to how Point Reyes should be managed to restore the park, as much as possible, to the condition in which it existed before the mid-1800s.

The five-year and one-year time frames for winding down ranching activities seems appropriate. As stated above, all doubts and inconsistencies between the goals for Point Reyes and the requirements of NHPA should be

resolved in favor of restoration and ecologically sensitive management. The Park Service should make recommendations to the State Historic Planning Office (SHPO) consistent with the goals outlined in these comments. The overall objective should not be preservation of all historic buildings, but implementation of a strategy that would restore the park, as much as possible, to the condition in which it existed before the mid-1980s. This does not mean the demolition and removal of all historic structures, but instead a selective reuse of certain structures consistent with the new management goals.

The statement regarding use of ranch complexes at page 48 is backwards; the strategy should be to minimize impact of the historic districts on the overall restoration and ecological goals for Point Reyes, not the other way around.

I am troubled by statements in the Draft EIS that suggest that management of the remaining historic structures would be done in such a way that commercial activities might inappropriately be expanded within Point Reyes. The following language - "adaptive reuse in ways compatible with park purpose and desired conditions" (p. 47) - seems vague and subject to possible abuse. Any plans for commercial activities on any of the historic properties should be subject to a further public planning process.

All the other alternatives - A through E - should be rejected in favor of Alternative F.

Alternative B Should Not be the Preferred Alternative

For all the reasons set forth above, Alternative B should not be selected for the General Management Plan. It is clearly not consistent with the goals that should guide management of Point Reyes.

The general description of this alternative is also disingenuous and misleading. At page iii of the Draft EIS, the Service says that this alternative "would allow for continued ranching with terms of up to 20 years and would set a population threshold for the Drakes Beach herd." And at page 25 the Service says under Alt. B it "would allow for continued ranching and establish a population threshold for management of the Drakes Beach herd." All of this suggests the Service is proposing to allow the ongoing level of ranching to continue. This by itself is troublesome and inappropriate for the reasons set forth above.

But then you see this language buried in a long paragraph at p. 26: "Additional diversification activities would be authorized in specific subzones in a manner consistent with this EIS." To find out what these additional diversification activities might be, you have to turn to p. 37 to a subsection entitled "Diversification." And here we learn that the concept of "additional diversification activities" is a euphemism for expansion of ranching activities and permission to undertake wholly new ranching and commercial activities. So Alternative B does not really contemplate continued ranching; to the contrary, it is proposing a substantial and significant expansion of ranching and commercial activities at Point Reyes. This is all the more reason to reject Alternative B.

The bottom line is that ranching and commercial activities are fundamentally inconsistent with preserving park resources and improving the visitor experience. How can these goals be achieved when habitat is denied to the indigenous and wild species, and access to public land for visitors is restricted to protect ranching and commercial activities?

Thank you for the opportunity to comment on this very important matter.

Andrew Schlickman

#6985

Name: Willis-Shore, Jason

Correspondence: I have lived in Point Reyes for 30 years. I came here primarily for the park. I spend much of my free time in the park, hiking the trails to see the wildlife and flora.

I am unhappy that the DEIS alternatives being considered fail to adequately protect our natural resources on the Point Reyes peninsula. Why would we continue to subsidize ranching operations on public land that degrade it and threaten native wildlife? Congress established the Point Reyes National Seashore to protect this land for the public and for future generations, and clearly not for ranching in perpetuity. NPS needs to reconsider its General Management Plan including its "preferred alternative" and engage appropriately and lawfully with its mission to protect the natural resources in our National Seashore.

#6986

Name: saunders, maurice

Correspondence: please adapt option f

#6987

Name: B, Lindsey

Correspondence: I care about protecting California's wildlife. I oppose the National Park Service's plan to kill native tule elk and expand commercial agriculture in Point Reyes National Seashore and Golden Gate National Recreation Area. I urge the National Park Service to instead restore the lands for wild animal habitat.

We should prioritize the preservation of our public lands and wildlife, not the economic interests of private ranchers. These commercial cattle ranches have serious negative environmental impacts on the park - polluting waterways, causing soil erosion, and harming the many endangered and threatened animals who live on Point Reyes. National parks exist to protect our natural resources and native wildlife. This park should be managed accordingly.

#6988

Name: N/A, N/A

Correspondence: Thank you for engaging with the community on this important issue and thank you for your time in reading my words here. I have visiting Point Reyes National Seashore multiple times, and each time has been a wonderful experience. This area is a both a wonderful place for people to experience the joys of nature and also crucial habitat for a number of threatened animal species, such as the Snowy Plover. Of all the options proposed in the Draft Management Plan, the only one I can support is Alternative F. Whereas Point Reyes is a critical habitat for flora and fauna, I cannot see how it is critical that ranching is carried out in exactly that location. There are plenty of other locations where this can be done. I'm not aware of any national shortage of milk brought about by the exhaustion of all other available land that would necessitate use of precious national park lands to increase production.

I would like to add the following comment on the mission of the NPS. The following statement is shown on <https://www.nps.gov/aboutus/index.htm>

"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"

Based on this mission statement, NPS has an obligation to PRESERVE Point Reyes National Seashore. It is well-documented that cattle ranching (and virtually every kind of animal agriculture) degrades the land. One only needs to compare the muddy pens of the Point Reyes ranches with the beauty of the area surrounding Coast Camp for evidence of this. Cattle ranching is also one of the most damaging activities for the climate. Surely it is therefore aligned with the NPS mission to support a REDUCTION in ranching. So allowing ranching to occur ON NPS lands must surely be considered inconsistent with the NPS mission. Requiring the ranchers to vacate Point Reyes will decrease methane emissions, allow the re-establishment of carbon-sequestering native ecosystems and hence act to preserve not only Point Reyes, but each and every invaluable park in the NPS system.



I support Alternative F.

#6989

Name: Sullivan, Cecelia

Correspondence: I appreciate that Point Reyes is designated as a space to see wildlife and natural landscapes. But, when I visit the park, rather than getting to chance upon elk (a species I rarely see in my life), I am instead seeing cattle which I already see everywhere.

I support phasing out ranching to restore the shoreline to its more wild existence enhance visitors experience to see the location as what it was intended to be-a wildlife refuge. Tule elk were successfully reintroduced to the area. At a wildlife sanctuary, I believe their health and safety should be prioritized.

#6990

Name: Danaher, Kathryn

Correspondence: We need to protect the earth, the animals, water, and air from the destructive practices of animal agriculture.

I oppose the National Park Service plan to kill native Tule elk, grow commercial crops, and permit ranchers to add chickens, turkeys, sheep, pigs, and goats to their exploitative operations. For this reason, I support Alternative F.

As national park land, this property was specifically set aside to protect, restore, and preserve the natural environment including the wild animals who live there. The original intention was to phase out dairy and cattle ranching, not add more crops or animals to increase ranching profits.

The proposed plan does not address the damage from grazing, including water-quality degradation and soil erosion. Also, adding new crops will create more conflicts with native wild animals.

Please abandon this inhumane and destructive plan by selecting Alternative F. I urge you to restore the Seashore's Pastoral Zone for wild animal habitat and repurpose historic ranch buildings for scientific research, interpretation, and public education.

#6991

Name: Vellutini, Ph.D., Michael

Correspondence: Dear Point Reyes National Seashore Superintendent, Please select the preferred alternative, "Alternative B" for the future of ranching in the Point Reyes National Seashore. I support agriculture in the Seashore and think it is a vital part of the region's history, culture, current economy, sustainability and biodiversity of the Point Reyes National Seashore. I appreciate the time and effort that has gone into researching all options for the draft EIS. I support 20-year leases, the ability for farmers and ranchers to succession plan, and the opportunity for farms and ranches to diversify their operations to viably and sustainably adapt their operations for generations to come. I wish that the diversification was not so limited in scope or size, 2.5 acres around structures in ranch core with no irrigation and other restrictions is cumbersome and inefficient. In addition, the draft EIS would have been more complete if research was done on an option that includes an Elk Fence between the agriculture and wilderness area and/or Elk relocation to the wilderness area. Agriculture is a partner in natural resource conservation and preserving open spaces. Many of the beautiful natural landscapes in the US near large urban areas are preserved because agriculture was there first to curb development. Agriculture and nature do co-exist and I support the farmers and ranchers in the Seashore for their part in providing for the local foodshed in a sustainable way. Agriculture plays an important role in combating Climate Change by providing local food, carbon sequestration and greenhouse gas drawdown. Studies and empirical evidence prove that properly managed livestock grazing improves biodiversity, reduces invasive species, and helps reduce wildfire potential on rangeland. Livestock grazing helps renew the landscape by helping seed distribution, aerating and fertilizing the

soil. These things equate to healthier plants, a greater plant diversity, and more plants on the soil surface, which equates to more roots in the soil, which means more carbon sequestered. Agriculture is important to me in the Point Reyes National Seashore, the preferred Alternative B is the best option from the draft EIS.

Thank you,

Michael Vellutini, Ph.D.

#6992

Name: Roberts, Jaima

Correspondence: I support Alternative F, phasing out cattle and dairy industry and returning the land to its natural state. The enabling legislation of the National Seashore supports wildlife protection and does not mention upholding private industry. The original leases to ranchers were to be 25 YEARS. Ranchers have already been paid handsomely for their land, so it is long overdue to phase out the ranches. Private business has no place on public land. Allowing industry and ranches to diversify their business is a bad idea. Already these ranches have been negatively impacting the land, mismanaged to allow soil erosion, scarring in the landscape, e.coli contamination in waterways and more. If you allow EVEN MORE agricultural practices on the seashore, there is no way to know the impact and there is no historical evidence you will be able to manage any negative impacts on the environment. Tule Elk should be protected for the survival of their species. They have already gone through a huge genetic bottle neck when they were almost completely wiped out except for 20 individuals. Every gene allele is important for the long term sustainability of the herd. The National Park should be protecting ALL Tule Elk, and allowing new herds to form and to TAKE DOWN THE FENCE at Pierce Point and allow all Tule Elk to roam free. Allowing business that has been linked to water pollution, species extinction and in Point Reyes is the culprit of over 60% of the greenhouse gas emissions, it is NOT a good idea to give that same industry a 20-year lease to continue degrading our national park. Point Reyes is a refuge to thousands of plants and animals. Point Reyes can be a leader in the fight for climate justice, and it starts with phasing out Beef and Dairy operations and restoring the land to its natural state. The EIS has NO MENTION of the effects of climate change in it, and does not include any information of the cattle and dairy's impact on climate change within the park.

#6993

Name: Pavlovic, Marko

Correspondence: I want the entire Point Reyes National Seashore area to be returned to its natural wild state, no ranching! This was the original intent of the proposal and any deviation is a result of cattle industry lobbying. The cattle are destroying the natural beauty of the area.

I support Alternative F, phasing out cattle and dairy industry and returning the land to its natural state. The enabling legislation of the National Seashore supports wildlife protection and does not mention upholding private industry. The original leases to ranchers were to be 25 years. Ranchers have already been paid handsomely for their land, so it is long overdue to phase out the ranches. "Cultural Resource" and "Historic" does not mean industry needs to be currently in operation. Private business has no place on public land. Allowing industry and ranches to diversify their business is a bad idea. Already these ranches have been negatively impacting the land, mismanaged to allow soil erosion, scarring in the landscape, e.coli contamination in waterways and more. If you allow EVEN MORE agricultural practices on the seashore, there is no way to know the impact and there is no historical evidence you will be able to manage any negative impacts on the environment.

Tule Elk should be protected for the survival of their species. They have already gone through a huge genetic bottle neck when they were almost completely wiped out except for 20 individuals. Every gene allele is important for the long term sustainability of the herd. The National Park should be protecting all Tule Elk, and allowing new herds to form and to TAKE DOWN THE FENCE at Pierce Point and allow all Tule Elk to roam free.

I do not support granting 20 year leases to cattle and dairy industry. Climate science has indicated we have less than 12 years to mitigate the worst of climate catastrophe. Allowing business that has been linked to water pollution, species extinction and in Point Reyes is the culprit of over 60% of the greenhouse gas emissions, it is not a good idea to give that same industry a 20-year lease to continue degrading our national park. Point Reyes is a refuge to thousands of plants and animals. Point Reyes can be a leader in the fight for climate justice, and it starts with phasing out Beef and Dairy operations and restoring the land to its natural state

The EIS has NO MENTION of the effects of climate change in it, and does not include any information of the cattle and dairy's impact on climate change within the park.

#6994

Name: N/A, N/A

Correspondence: Addendum to previous letter submitted.

An evacuation plan must be developed for Pt Reyes in the event of wildfire, earthquake, road collapse, etc before allowing more visitors to the Park. Funding must also be secured to ensure enough rangers are hired to enforce current regulations regarding visitors including abuses to parking, bikers on single track trails, bike night riders on trails, off-leash dogs, etc that degrade the wild lands of the park and threaten wildlife by too much human presence.

#6995

Name: Tilley, Sharon

Correspondence: I'm writing to express my support for the public access and bicycling improvements outlined under Alternatives B, C, D, E, and F. As a Marin resident and avid bike rider, I love riding in the wide open spaces of West Marin. However, the speed of car traffic and lack of comfortable bike shoulders in the Point Reyes area prevents me from riding there as often as I would if it was safer and more accessible to bikes. Just two weeks ago, as I was taking a quick roadside break on my bike near Five Brooks Stable, a pickup speeding in the opposite direction made a hostile crude gesture to me - since I wasn't even riding, and was on the other side of the road, it made me wonder how safe it is to ride in the area.

To maximize bike recreational use, please consider the following trail connections and plan elements: - Devil's Gulch to Platform Bridge Road connection using existing ranch roads. - connection between Bolinas Ridge Trail at Olema Hill and Point Reyes Station to serve as an interim connection for the Cross Marin Trail. - Bolinas Ridge Trail to Five Brooks Stables connection using existing ranch roads. - Drakes Estero to Abbotts Lagoon Trail connection using existing ranch roads. - Marshall Beach Trailhead and Pierce Point Road using existing ranch roads. - Estero Trail loop using existing ranch roads.

I would feel much safer riding in Pt. Reyes National Seashore and surrounding areas on trails, pathways, and ranch roads, rather than on roads shared with fast-moving vehicular traffic.

Thank you for your consideration,

Sharon Tilley

#6996

Name: Savage, Allison

Correspondence: I oppose the National Park Service plan to kill native Tule elk, grow commercial crops, and permit ranchers to add chickens, turkeys, sheep, pigs, and goats to their operations. For this reason, I support Alternative F.

As national park land, this property was specifically set aside to protect, restore, and preserve the natural environment including the wild animals who live there. The original intention was to phase out dairy and cattle ranching, not add more crops or animals to increase ranching profits. Cattle ranching is a significant contributor to greenhouse gases, and as stewards of the land, NPS should not be in the business of increasing it on the people's land.

The proposed plan does not address the damage from grazing, including water-quality degradation and soil erosion. Also, adding new crops will create more conflicts with, and reduce habitat for, native wild animals.

I quote below, two of the primary goals of the management plan, as described in Table 2 of the EIS document:

Habitats and populations of threatened and endangered species, special-status, and rare species persist and are improved. Native plant and animal communities persist and thrive.

It is difficult to understand how the NPS can argue in good faith that Alternatives B-E are consistent with those goals.

The NPS should also consider recreational and educational opportunities that could be provided by working ranches, if Alternative F is not selected. One possibility is that ranching leases could have a required educational or recreational aspect, which would require ranches to provide educational programs or access opportunities for visitors to learn about historic ranching practices in the Seashore. Without such provisions, the NPS is just closing off public space for private benefit.

#6997

Name: Winkler, Monique

Correspondence: I'm writing to support the public access and bicycling improvements outlined under Alternatives B, C, D, E, and F. I strongly support proposals that would lead to the planning and implementation of bicycling routes on trails, ranch roads, and pathways throughout the planning area, including but not limited to: 1) a connection between Devil's Gulch and Platform Bridge Road using existing ranch roads, 2) a connection between Bolinas Ridge Trail at Olema Hill and Point Reyes Station to serve as an interim connection for the Cross Marin Trail, 3) a connection between Bolinas Ridge Trail and Five Brooks Stables using existing ranch roads 4) a connection between Drakes Estero and Abbotts Lagoon Trail using existing ranch roads, 5) a connection between Marshall Beach Trailhead and Pierce Point Road using existing ranch roads, and 6) an Estero Trail loop using existing ranch roads. I encourage NPS to collaborate with ranchers and other stakeholders to educate the public and address concerns related to public access on working ranch lands.

The improvements outlined above would enable and encourage me to visit the Seashore more regularly-and by bike, rather than car. I would feel much safer riding in the Seashore and surrounding areas on trails, pathways, and ranch roads, rather than on roads shared with fast-moving vehicular traffic. Bicycling opportunities are currently very limited and fragmented, so any improvements in connectivity and the creation of new loop options would enable me to enjoy more of the Seashore and surrounding areas by bike.

#6998

Name: Roberts, Pamela

Correspondence: My family has been hiking in the Point Reyes Seashore for the last 30 years. Over this period of time it is quite evident that dairy farmers have not been required to meet basic environmental requirements for methane emissions. The amount of manure from dairy cattle is not being adequately treated and there is obvious environmental degradation in the national park. When I read that the NPS planned on killing off large numbers of Tule elk due to overpopulation, I was surprised that the mention of overpopulation of cattle was not mentioned. That is a far bigger problem and it is not addressed in the EIS. In fact the opposite is the case as farmers concerns have received more consideration than the habitat they are negatively affecting. The water in the park is also

negatively affected and resources are being diverted to ranchers and cattle that should be allocated to the Elk, birds and other natural habitat systems. One explanation for such a skewed evaluation by the study is that the relationship between ranchers and the Park personnel is too close to be objective. No doubt over the many years of connection between these groups, friendships have developed and objectivity of the goals and responsibilities of NPS has been lost. A new group. With no contact with farmers looking at the same data would have reached different conclusions. The report does not take into consideration that the farming methods employed in this area are below the standards set by regulatory agencies dealing with waste disposal, water use, and contamination of water and soil, not to mention that there appears to be no requirement for the ranchers to protect wildlife from destruction from their activities. The farmers in this area were paid \$350 million dollars to give up this land after the expiration of their 20 year leases. This makes it clear that these ranches were limited to a 20 years period to clean up and leave. Ranching is not compatible with wildlife in this area (probably not anywhere). The drought made that more obvious. Tule Elk are not the problem they are being blamed for. The public has been misled by the pro-rancher slant to the EIS. Independent action such as lawsuits will be necessary in the event that this degradation by ranchers continues. The public trust necessary for protection if the land is being put aside and ignored in order to allow ranchers to continue these ventures. The leases have expired and should not be extended. The ranches need to be shut down and the land restored to enable native habitat to thrive in the park. This is an important function of the NPS. I feel strongly that the EIS has not been reviewed fairly and needs to be re-evaluated by an independent entity taking into consideration all of the issues involved but with the goal of determining the appropriate end goal of restoration of the park for the protection of native species and the environment.

#6999

Name: N/A, N/A

Correspondence: Raising livestock for meat consumption is one of largest known contributing factors to climate change. I vote that the lease to the ranch lands NOT be renewed, and to turn the land back over to the parks for elk conservation efforts, and to help combat climate change.

#7000

Name: N/A, N/A

Correspondence: I am concerned that plans to permit current occupants of government owned ranch complexes to offer overnight accommodation to visitors to the Seashore or north district of GGNRA violates standard concession award procedures. Surely, if any structures or parts of structures are no longer required for ranching operations on government owned lands, those structures should be removed from the ranching lease and revert back to the National Park Service. NPS would then be in a position to modify the structures to make them suitable for visitor overnight accommodation and then seek bids for a concession contract for overnight accommodation. Any NPS action to simply allow the current lessees of government owned ranch complexes to establish businesses offering overnight accommodation or other visitor services in government owned structures without providing the general public an opportunity to bid on these business opportunities would provide an unfair and unjustifiable opportunity to the current lessees. I, myself, would be interested in bidding on such a business opportunity. I will consider legal action if the current lessees of these government owned ranch complexes are provided the opportunity to establish visitor service or business activities other than ranching on these complexes without providing the general public an opportunity to competitively bid for an opportunity to provide these services.

#7001

Name: Leary, Barbara

Correspondence: I am writing in support Alternative F of the Park Service Plan - this should be the first and only plan that will be considered. Cattle and Dairy industry activities at the site should be phased out. The enabling legislation of the National Seashore supports wildlife protection and does not mention upholding private industry. The original leases to ranchers were to be 25 years. Ranchers SOLD their land for PUBLIC use; it is long

overdue to phase out the ranches. "Cultural Resource" and "Historic" do not apply to ranching or dairy business which are 20th century developments that have taken place on valuable habitat and Native American sites.

E. Coli contaminates the ground water, streams and ultimately our ocean; there is no evidence that the short funded Park Service will be able to manage any negative impacts on the environment. I oppose 20 year leases of this land, these should be phased out and the cattle and dairy industry be given a time frame in which to move their operations to lesser impacted sites. The National Park should be protecting the Tule Elk which have already barely survived extinction, the Park Service should be allowing new herds to form and to TAKE DOWN THE FENCE at Pierce Point and allow all Tule Elk to roam free.

Point Reyes can be a leader in the fight for climate justice, and it starts with phasing out Beef and Dairy operations and restoring the land to its natural state.

Finally I have noted that the EIS has NO MENTION of the effects of climate change in it, and does not include any information of the cattle and dairy's impact on climate change within the park, therefore rendering it non-compliant with environmental regulations that exist for the protection of our valuable resources.

#7002

Name: Elliott, Ann

Correspondence: I address these key points: 1) The DEIS documents that Alternative E should be the preferred alternative (a compromise); 2) Ranchers need to embrace NPS Core Values and their leases and Ranch Operating Agreements (ROAs) need to reflect that; 3) The requirements of Appendix D Management Activity Standards and Mitigation Measures need to be insured with incentives, training, continuing communication, and consequences for ranchers; Appendix D inadequately addresses aesthetic issues of ranches and solutions to those issues; 4) If ranching is going to continue in the park, NPS should begin a program for ranchers to enhance rather than harm natural processes in the park; 5) NPS should avoid controversial reduction of the Drakes Beach Tule Elk herd.

1) THE DEIS DOCUMENTS THAT ALTERNATIVE E SHOULD BE THE PREFERRED ALTERNATIVE: The DEIS documents that overall the natural environment would be best served with Alternative F (no ranching). Since the political climate seems to favor continued ranching in Point Reyes National Seashore and Golden Gate National Recreation, NPS has identified Alternative B as the preferred alternative. However, from the Cumulative Impacts section in each category of Chapter 4: Environmental Consequences it is clear that Alternative E (phasing out dairy operations) equals and usually exceeds outcomes of Alternative B. Therefore, Alternative E is the logical compromise between Alternatives B and F. Below are excerpts from the Alternative E sections of Chapter 4: Environmental Consequences supporting that: Soils: Overall, soil conditions would improve compared to existing conditions from the implementation of a zoning framework, management activity standards and mitigation measures, and conversion of dairy ranches to beef operations. (DEIS 111) Water Resources: Overall, water resources would improve under alternative E compared to existing conditions from the implementation of a zoning framework and cessation of dairy operations. (DEIS 123) Vegetation: Alternative E would contribute beneficial and adverse impacts from continued grazing and ranching activities, depending on the species, especially in grasslands where grazing would occur. Alternative E would implement a zoning framework that would focus the most intense uses associated with ranching operations in areas that are already highly disturbed and/or altered and remove areas from ranching to protect sensitive species, resulting in beneficial impacts on vegetation compared to existing conditions, especially in riparian areas. In addition, the conversion of the six dairy operations to beef cattle operations would reduce the adverse impacts of concentrated livestock use and continue the same types of adverse and beneficial impacts from beef cattle grazing as described above. (DEIS 138) Wildlife: Overall, impacts on wildlife would be reduced compared to existing conditions from the implementation of a zoning framework and cessation of dairy operations. (DEIS 159) Tule Elk: Alternative E would contribute beneficial impacts from habitat modifications and improved pasture conditions from conversion of dairy ranching to beef ranching as well as a reduction in hazing, resulting in a beneficial impact compared to existing conditions. Adverse impacts would result from fencing. When the impacts of alternative E are combined with the impacts from past, present, and reasonably foreseeable actions, the overall cumulative impact on elk would be beneficial

compared to existing conditions. (DEIS 165) Visitor Use, Experience and Access: The incremental impacts of alternative E would contribute noticeable beneficial impacts, particularly from the potential additional opportunities to view elk and reduction in noise and odor impacts associated with dairy operations. (DEIS 170) Cultural Landscapes, Historic Districts, and Historic Structures: While alternative E would maintain the pastoral landscape across all 24 ranches, it is anticipated that dairy infrastructure would become vacant on 6 dairies, resulting in adverse impacts on historic structures. (DEIS 174) However, The ranches in the Point Reyes Peninsula Dairy Ranching Historic District are in poor to good condition (table 7). (DEIS 87) Funds from NPS and the proposed maintenance account & funded through a portion of the rental payment (DEIS 173) would be needed to improve the condition of those structures in all the alternatives. Socioeconomics: Alternative E would contribute to regional employment and gross regional product from continued support of employment, incomes, sales, and taxes by ranchers, park spending and projects, and visitation to the park. However, conversion of dairy ranching to beef ranching would result in adverse impacts compared to existing conditions from the loss of \$14.4 million in annual revenue and 27 jobs at ranches in the planning area. When the incremental impacts of alternative E are combined with the impacts from past, present, and reasonably foreseeable actions, the overall cumulative socioeconomic impacts would remain beneficial. The incremental impacts of ranching under alternative E would contribute 0.01% of gross regional product and employment in the study area. (DEIS 184) Similarly, The incremental impacts of ranching under alternative B would contribute 0.03% of total regional employment and 0.01% gross regional product in the study area. (DEIS 181) That is the same 0.01% as alternative E (not a significant portion of gross regional product). Economic viability of dairy ranching is in jeopardy around the world (Barrett 2019), much less in the restrictive confines of a National Park Historic District. Air Quality: Alternative E would have impacts that would be adverse from beef cattle, fugitive dust, and mobile source emissions. The elimination of dairy cattle would result in beneficial impacts compared to existing conditions; however, alternative E would also add a small amount of PM2.5 from an increase in beef cattle AUs. (DEIS 194)

## STRENGTHS AND DEFICIENCIES IN THE DEIS AND ASSOCIATED DOCUMENTS.

2) NATIONAL PARK CORE VALUES NEED TO BE EMBRACED BY RANCHERS: The DEIS, Draft Lease agreement and ROAs need to clearly state that these ranchers are leasing National Park Land (a special place owned by all Americans and visited by the world), and that ranchers are partners in the mission of the National Park Service as detailed in the Draft Foundation Document for PRNS and the Desired Conditions (DEIS 2-3). NPS leasing code states The lease will not result in degradation of the purposes and values of the park area. (USC 2011) These ranches are not leased from the Shafters, the Howards, or a large corporation (with a different set of ethics). Ranchers must agree to adopt NPS Core Values and work with NPS and others to care for the natural and cultural resources of the park, so that we all can be proud of it. If they want to embrace other values, they can move their operations to less restrictive private lands.

3) ZONING FRAMEWORK A GOOD TOOL BUT NEEDS TO BE STRENGTHENED: I applaud the new Zoning Framework and associated Appendix D Management Activity Standards and Mitigation Measures which are to become part of the annual Ranch Operating Agreements (ROAs). NPS has clearly communicated to the Ranchers standards for vegetation, wildlife, and ranch management. DEFICIENCIES: To insure compliance, Appendix D should identify incentives for ranchers to adopt these standards and measures, training to help them with their use, requiring periodic (annual) communication with NPS and other agencies, consequences for not following the guidelines. Ranch Aesthetics need to be addressed in the Management Activity Standards, as well as the one line in the draft lease agreement. The ranches along with all the park lands are visited by the American Public and international visitors. The ranchlands and natural areas are a showcase of our American stewardship of our natural and cultural resources. The section Visitor Use, Experience, and Access of the DEIS Executive Summary states: Alternatives D and E would have some beneficial impacts related to experiencing natural sights and sounds by reducing ranching and closing dairy operations, respectively. However, discontinuing dairy operation in alternative E would result in an adverse impact by removing the opportunity for visitors to observe and experience active dairy ranching in a historic district. (DEIS viii) However, the DEIS does not directly address many of the negative aesthetics of dairy operations that I have witnessed, and other Seashore visitors might experience: - Pastures mown and or grazed so more soil is evident than plant material, often with that soil blowing across the road with the wind. - Sight and smell of manure spread across fields at the edge of roads, trails, and

parking areas. - Manure-spreading trucks covered in manure parked along the park road. - Waist-high thistles and other weeds growing on pastures caused by spreading manure the previous summers. - Pregnant or just delivered cows and calves lying in or lumbering through a foot of mud in small pens. - Tens of newborn dairy calves isolated in shelters. - Unused calf shelters scattered along a fence. - Broken or unused ranch implements and vehicles strewn about ranch core areas along park road. - Furniture and personal items (seemingly broken or unused) overflowing from the decks and steps of worker houses along park roads. - Vultures feeding on the carcass of a dead cow. - Ranch truck speeding on the park road to Drakes Beach and almost hitting a group of elk that were crossing the road. Solutions to some of the above issues are addressed in the Management Activity Standards. Further solutions include higher RDM in poor soil areas, 100-foot buffer for manure spreading from any public thoroughfare, more proactive prescriptive grazing and mowing of weedy pastures, humane treatment for cattle and wildlife, and proper storage of ranch and personal items out of public view.

4) **MODIFY RANCHING TO ENHANCE RATHER THAN HARM NATURAL PROCESSES:** The ROAs are designed to minimize the adverse impacts of ranching. NPS should go beyond that and work toward improving natural processes on park lands. Any alternative which includes ranching should include incentives (grants, rent reduction, etc.) for ranchers to modify their ranching techniques (reduced AUs, prescriptive grazing, restoration of pasture to native vegetation, improved manure management systems) to improve habitat for wildlife species which increases natural biodiversity, and to improve soil, air and water quality.

5) **NPS SHOULD AVOID CONTROVERSIAL REDUCTION OF THE DRAKES BEACH TULE ELK HERD:** Seasonal patterns of elk use in the Drakes Beach area, particularly by the main herd, reduce the likelihood of competition because elk use of ranches is more concentrated following the peak growing seasons of winter and spring. All the ranches where elk occur adhere to the RDM monitoring standards. (DEIS 82) Therefore, the amount of forage consumed by Tule Elk on these ranches and their presence predominately during the summer and fall result in adequate RDM and hence little forage competition with livestock. NPS should continue to monitor the seasonal presence of Tule Elk and their effect on livestock forage. If competition is documented, instead of establishing a maximum population size for the Drakes Beach Herd, NPS should reduce cattle AUs and associated rent on affected ranches and / or otherwise offset the documented costs by ranchers for supplemental feed. Increasing densities of Tule Elk will naturally promote better species composition and structure of the areas plant communities.

Barrett, Rick. Dairyland in Distress: Struggling to tread water: Dairy farmers are caught in an economic system with no winning formula. Milwaukee Journal Sentinel. Updated 12 Sept. 2019. Web. Sept. 2019  
<https://www.jsonline.com/in-depth/news/special-reports/dairy-crisis/2019/05/16/wisconsin-dairy-farms-closing-milk-prices-drop-economics-get-tough/3508060002/>

USC. Title 36 - Parks, Forests, and Public Property. Chapter I - NATIONAL PARK SERVICE, DEPARTMENT OF THE INTERIOR Part 18 - LEASING OF PROPERTIES IN PARK AREAS. 2011. Web. Sept. 2019  
[https://www.govinfo.gov/#citation?csh={"collection":"default","searchCriteria":\[\],"selectOptions":\[\]}](https://www.govinfo.gov/#citation?csh={)

#7003

Name: Tanner, Garret

Correspondence: Hello NPS. I appreciate and support the improvements in public and bicycle access outlined under Alternatives B, C, D, E, and F. As a long-time rider, I find myself shying away from Pt. Reyes riding for a number of reasons. Any improvements to access and safety that can be made in the region will certainly open a new world of riding opportunities in Pt. Reyes and I look forward to riding there more often.

#7004

Name: Heagerty, Daniel

Correspondence: September 23, 2019



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

RE: Formal Comments on DEIS

Dear Supervisor:

As a resident of Marin County I visit the PRNS regularly to experience the unique and unparalleled natural resources found on these public lands. As one of only seven National Seashores, with unparalleled natural resources, these lands exemplify our country's Public Trust Resources.

**Public Interest** The DEIS does not adequately disclose how the NPS, in selecting its preferred Alternative B, meets the Congressional mandates articulated in the enabling PRNS Act. The statute stipulates as follows: PRNS 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 of the area. 90 Stat. 2515

How does Alternative B comply with that mandate? To date the NPS has documentation of continual water quality non-compliance of state and federal standards, annual native bird kills caused by agricultural practices, groundwater depletions, soils degradations, elk die-offs, illegal No Trespassing signages on leaselands meant for public access, population decreases of listed threatened and endangered species, no accounting of predator control practices (annual coyote, fox and other species kills), and no meaningful restoration activities at a landscape level.

I understand that a recent visitor survey found that over 80% of PRNS visitors come to the Seashore for the wildlife and other natural resources, while less than 20% of the visitors come for ranching and dairying appreciation. Please describe for the public how NPS finds Alt B in the public interest.

Greater discussion of NPS actions over the last 35 years concerning environmental impact and the numerous federal actions NPS has taken that impact public resources would help the public review of the Alternatives. The ongoing and cumulative impacts of 35 years of agricultural practices, or the cumulative impacts of NPS management practices, are not given enough discussion. The public has not had the benefit of disclosures and reviews of Seashore resource losses for three decades, while resource degradations appear to be increasing. More details on these issues would better inform the public for understanding what could be expected for Alternative B.

A review in the EIS of leaseholders violations of lease conditions and what actions the NPS took to remedy those lease violations will help the public understand lease compliance issues. In addition, a description of leasehold and land management (wildlife conflicts, water quality, water resources, and soils) monitoring and reporting practices need to be further described, as the DEIS provides limited information on this topic.

**Water Quality** Water quality conditions on several leaselands do not meet state or federal water quality standards. Please explain why allowances or exemptions are allowed on public lands, especially since these ongoing allowances conflict with the law? The DEIS does not adequately address the groundwater contamination and depletions that have occurred over the past 35 years, leaving the public unable to assess what the future conditions would be with Alternative B. For example: over the last two drought periods how much groundwater extraction occurred? What was the recovery period for the groundwater resources (location-specific). And given the models regarding climate shifts how will NPS manage (ie protect) the groundwater resources so recovery is consistent with natural, changing processes? The EIS needs to describe how our water resources (quality and quantity) will be protected during the upcoming longer term and more severe droughts. Alternative B does not appear to adequately address how the NPS intends to remedy these ongoing and future impacts, given that there will be less water available going forward. In fact, Alternative B appears to inevitably increase our water quality and water resource degradations. Please explain how the NPS is determining that past and future water resource

degradations, that benefit a handful of commercial interests, should take priority over our threatened species and elk? Please explain the NPS position on this issue regarding the public interest.

**Soils** The NPS has studies documenting soil compaction and RDM impacts to soil health. The available public information does not indicate the NPS has taken any substantive remedial or restoration actions. It would benefit the public to have a clear description of what the soil impacts have been over the past 35 years, what the NPS has done to remediate soil degradation, and what the NPS plans to do for restoration. How many acres does NPS anticipate need to be and (under Alt B) will be restored? Will the leaseholders responsible for the soil degradations be responsible for the needed restoration activities? Will the new leases stipulate specific actions, schedules, management practices, monitoring and penalties for non-compliance? Has the NPS required any leaseholder to remedy soil problems (if so, where)? Can the public expect to see these measures written into the new leases?

A well-credentialed soils scientist with a 35 year career with the (then) Soils Conservation Service and the BLM visited 5 leaseholds in 2017. (He served on the national federal lands task force that developed the Rangelands Management Guidance for federal lands). His assessment of our Pt Reyes lands found that the soils have been severely damaged by overgrazing and soils compaction. He found that very focused soils restoration actions are needed on much of the Seashore lands used for ranching and dairying. Additionally, carbon sequestration opportunities are clear and could be very successful if the ranching and dairying practices were greatly reduced or removed from the Seashore. The public would benefit if the EIS provided more disclosure of the soils conditions, the likely future degradations with Alternative B, and more meaningful restoration opportunities for the future. The DEIS lacks any specificity as to how the NPS will change agricultural practices sufficient to restore and regenerate our soils. Additionally, the EIS would do well to develop an alternative, or part of Alt F, that describes what could be achieved with a management plan that prioritizes carbon sequestration.

**Native Birds** The DEIS is not clear regarding estimated losses of native birds each year by mowing and other farm practices. The NPS has been aware of these bird kills for decades. It would be helpful to know the estimated annual losses, whether some locations or habitats suffer more than others, and what the estimated population impacts over time have been. The EIS needs to better describe what mitigations the NPS has employed, how successful have they been, and how Alternative B will improve the situation.

Predation of the endangered snowy plover has increased over time. There have been links to the agricultural practices and how those activities have changed certain species populations and behaviors, related to food and water availabilities. The DEIS was not clear regarding these relationships and did not describe what actions NPS has taken or intended to take to mitigate these indirect species impacts. Alternative B, intending to expand agricultural practices, will clearly have additional impacts on the native bird populations. The EIS needs more explanation regarding the NPS science around this and how Alternative B would likely exasperate these conditions.

**Public Costs of Ranching/Dairying** It would help the public if the EIS would more clearly disclose the public costs of ranching and dairying at PRNS, both historically and projected (for each alternative) over the next twenty years. What are the current annual costs to NPS for providing consulting, meetings, monitoring, fencing, road maintenance and other management and operational costs? What is the public subsidy annually for the below-market leases, and what is the total to date since the public acquired these lands? In today's dollars, how much did the public pay for the land acquisitions? In total, since the Seashore was established, what has been the public's cost for these ranches and dairies in current dollars? How many of the leaseholders receive additional federal, state or local farm subsidies? How much in public funds have been expended for these agricultural uses and how much will the public pay for the next twenty years under Alt B? This information will help us understand the full cost accounting of the public's expenditures for providing these leases.

If Alternative B were to be approved, what will be the NPS annual budget for leaselands management and operations? Adding more animals, row crops, B&Bs etc, per Alt B, could substantially increase NPS costs, yet the DEIS provides limited information re: these public funding commitments. The expanded agricultural activities would increase public road maintenance costs, as well as other infrastructure costs (utilities to more farm

buildings and B&B housing, more fencing, more water extraction, storage and distribution requirements, etc). The EIS needs to disclose the anticipated future costs of Alt B, what will be the public's cost and what will be the leaseholder costs? Since any land improvements would be on public lands, will the public own any new or upgraded buildings, utilities and other land assets? If not, why not?

The DEIS does not provide information for the public regarding the business plans and financial models that the DEIS leads us to believe are the basis for selecting the Alt B agricultural, lodging and other commercial expansions. The DEIS provides no background or independent economic assessments of these assertions, leaving the public to wonder if Alt B would in fact be economically sustainable, or a further continuation of economic challenges. Both beef and dairy consumption, for example, may well diminish on a per capita basis as society adjusts its carbon and water consumption habits to meet climate change demands.

Alt B will increase GHG emissions in all its aspects. At what cost to the public? Please disclose what the total GHG tonnages will be for all aspects of Alt B (ranch, dairy, soil, transportation, etc) and estimate the public costs based on current life-cycle cost accounting models for GHGs.

Historic and Cultural Resources (H&CRs) The DEIS suggests the historic and cultural resource values of agriculture at PRNS are unique and must be protected. Yet the DEIS is not clear on how the NPS made this assessment and reached the conclusion that it is in the public interest to protect these resources. Were all the H&CRs evaluated for their individual merits? For context, please inform the public as to how many acres of ranching and dairying currently exist on public lands in California, compared to PRNS? How many acres in Marin County are in beef and dairy with presumably similar cultural or historic value? The DEIS does not distinguish what are technically of historic value (buildings) versus livestock on our public lands. It will benefit the public to have more explanation of context for NPS to determine H&CR significance, how expanded operations would benefit these resources, and what is most important to the public (ie cattle versus elk and other wildlife). Pierce Pt Ranch appeared to have captured the best of C&HR values, but without any livestock, for years. The DEIS suggests Alt B is the preferred means to protect C&HRs, but doesn't explain what Alt B does that Pierce Pt hasn't already accomplished for the public, and could be easily replicated. Please explain why Alt F could not accomplish everything Pierce Pt has accomplished, without all the environmental impacts and public resource losses.

Based on the Seashore Act creating the PRNS, the fair market price paid by the public to remove commercial interests, the documented species and habitat losses caused by the commercial farming operations, the significant growth of visitors seeking natural resource experiences, and in the interests of climate and future generations, Alternative B appears arbitrary and politically based, capricious in its dismissal of the science, and a failure regarding the NPS Public Trust stewardship responsibilities.

Alternative F meets the intent of the enabling Act and best serves the public interest.

Please move forward with a management plan that fulfills the promises of a protected national seashore that benefits all natural resources and serves the public at large, versus an alternative (B) that primarily serves a small and select group of commercial interests.

Sincerely,

Daniel D Heagerty

#7005

Name: Farley, Nan

Correspondence: Keep this land public!!

- This is a National Park created and subject to official agency regulations and its 1962 Congressional legislation signed by President John Kennedy.
- It is not ruled by memos; handshake, wink, and nod agreements; or by intentionally-compromised and possibly-corrupted NPS individuals and leadership.
- It is not BLM, Forestry Service, or Department of Agriculture holdings that permit resource development and extraction.
- It is a National Park. Please keep it that way...

#7006

Name: Silva, Mark

Correspondence: My preference is for Plan F. Commercial operations in the park should have ended 20 years ago! They're continued operations within a national park threatens our entire park system. All the ranchers agreed to leave when they accepted their government buyout checks and were all set to sell to developers if the government didn't step in. These subsidized "welfare" ranches should end, finally.

#7007

Name: Dunning, Connell

Correspondence: Ms. Cicely A. Muldoon, Superintendent National Park Service Point Reyes National Seashore 1 Bear Valley Road Point Reyes Station, California 94956

Subject: Draft Environmental Impact Statement for Point Reyes National Seashore General Management Plan Amendment, Marin County, California (EIS No. 20190187)

Dear Ms. Muldoon: The U.S. Environmental Protection Agency has reviewed the above-referenced document pursuant to the National Environmental Policy Act, Council on Environmental Quality regulations (40 CFR Parts 1500-1508), and our NEPA review authority under Section 309 of the Clean Air Act. The EPA provided several recommendations to the National Park Service in our November 30, 2018 scoping letter pertaining to the Point Reyes National Seashore General Management Plan DEIS, including the suggestion to analyze and discuss the potential impacts to water quantity and quality associated with the NPS authorizing new diversification activities (such as the production of row crops and the raising of new livestock) in the proposed Ranch Core and Pasture subzones. The EPA suggested the NPS include a comparison in the DEIS of the water usage requirements of each alternative, describe the source(s) for the water to be used for the new activities, and analyze and describe the potential impacts from activities such as fertilizer and pesticide use and livestock waste management. Potential Impacts from Proposed Diversification Activities The DEIS states that new diversification activities could be allowed in specified subzones under the preferred alternative, Alternative B. These diversification activities could include new types of livestock (pigs, chicken, sheep, and goats), row crops, horse boarding, ranch tours and farm stays, small-scale processing of dairy products, and sale of local agricultural products. The DEIS describes that these diversification activities would be required to be incorporated into an individual Ranch Operating Agreement prior to implementation, and the ROAs would include required mitigation measures and best management practices. Additionally, the DEIS notes that confinement of livestock species would be required to meet the State Water Resources Control Board regulations for waste management and any other applicable regulations, and that row crops would be limited to 2.5 acres per ranch, could not be sustained by irrigation, and would be allowed only in previously disturbed areas in the Ranch Core subzone. The EPA recognizes the efforts made by the NPS to ensure impacts associated with these diversification activities are addressed. We suggest the NPS provide additional information in the FEIS, however, regarding the potential impacts associated with these activities. For instance, some of the land contained in the Ranch Core subzone, such as the areas within alluvial fans, are in low-lying areas that could be vulnerable to flooding, and existing or proposed BMPs may not be sufficient to prevent or mitigate impacts from areas subject to repeated flooding events. Similarly, while we

commend the NPS for limiting proposed crop production to previously disturbed areas, we have questions regarding the amount of water that will be required to sustain these crops, and whether row crops may be sited in low-lying areas susceptible to erosion, runoff, and flooding, thereby potentially introducing fertilizers and pesticides into impaired water bodies, including Tomales Bay, which is on the Clean Water Act section 303(d) list for pathogens, mercury, nutrients, and sedimentation.

Recommendations: Include in the FEIS an assessment of the water usage for all proposed diversification activities, across all ranching and dairy operations. Identify the source(s) of water, and proposed water transport, for these activities and describe how reasonably foreseeable changes in climate could impact future water supply. Assess the potential for erosion and flooding for all low-lying areas in the Ranch Core subzone, including all livestock confinement operations with waste management requirements. A void proposing diversification activities in low-lying areas and flood zones. Where activities cannot be avoided, coordinate with the San Francisco Bay Regional Water Quality Control Board to identify all project design commitments to reduce future impacts from flooding events.

We note that effective October 22, 2018, the EPA no longer includes ratings in our comment letters. Information about this change and the EPA's continued roles and responsibilities in the review of federal actions can be found on our website at: <https://www.epa.gov/nepa/epa-review-process-undersection-309-clean-air-act>. The EPA appreciates the opportunity to review this DEIS, and we are available to discuss our comments. When the FEIS is released for public review, please send one hard copy and one CD to the address above (mail code: TIP-2). If you have any questions, please contact me at 415-947-4161, or contact Jason Gerdes, the lead reviewer for this project. Mr. Gerdes can be reached at 415-947-4221 or [gerdes.jason@epa.gov](mailto:gerdes.jason@epa.gov).

Sincerely, Connell Dunning, Acting Manager Environmental Review Branch

cc via email: Leslie Ferguson, San Francisco Bay Regional Water Quality Control Board Janet O'Hara, San Francisco Bay Regional Water Quality Control Board

#7008

Name: Gilbert, Dori

Correspondence: Dear National Park Service:

I am opposed to the plan to shoot tule elk in California's Point Reyes National Seashore to appease private livestock owners who already get subsidized grazing of their cows on MY public land (paid for by MY tax dollars).

Native wildlife and the public's ability to enjoy them should take precedence over private interests.

Cattle ranching should not be allowed on public land if it's going to destroy that land and the wildlife on it!

Furthermore, • Point Reyes National Seashore is supposed to be managed under the Point Reyes Act for "maximum protection, restoration, and preservation of the natural environment." There's no mandate for prioritizing commercial agricultural

Thank you, Dori Gilbert

#7009

Name: basile, lisa

Correspondence: NEWS TAKE ACTION SHOP DONATE

Don't Shoot Point Reyes Tule Elk! August 29, 2019 - Posted by Lisa Levinson TAG: TAKE ACTION, TULE ELK  
The National Park Service (NPS) plans to kill native Tule elk in California's Point Reyes National Seashore,

convert park grasslands into crops, and let cattle ranchers expand their businesses to kill sheep, goats, chickens, and pigs. After decades of activism, this is an outrage! Submit your comment to stop the NPS's diabolical plan by selecting Alternative F.

When the Seashore was established in 1962, ranchers were permitted to continue their business in park for their lifetime or twenty-five years. Ranching was not even considered a reason for establishing the Seashore. Now the National Park Service plans to shoot up to fifteen elk annually to "compromise" with cattle ranchers who graze their animal victims within the Seashore.

#### What YOU Can Do

We've still got time to stop the National Park Service from shooting Point Reyes Tule elk! Follow the instructions below to submit your letter to the National Park Service no later than Monday, September 23, and then please make sure to tell us you've taken action. Please note that comments will ONLY be accepted and counted by NPS via this method involving its web submit form.

Send your comments to the National Park Service.

Step 1: Copy our letter below.

As a member of the California-based international animal protection nonprofit organization In Defense of Animals with over 250,000 supporters, I oppose the National Park Service plan to kill native Tule elk, grow commercial crops, and permit ranchers to add chickens, turkeys, sheep, pigs, and goats to their exploitative operations. For this reason, I support Alternative F.

As national park land, this property was specifically set aside to protect, restore, and preserve the natural environment including the wild animals who live there. The original intention was to phase out dairy and cattle ranching, not add more crops or animals to increase ranching profits.

The proposed plan does not address the damage from grazing, including water-quality degradation and soil erosion. Also, adding new crops will create more conflicts with native wild animals.

Please abandon this inhumane and destructive plan by selecting Alternative F. I urge you to restore the Seashore's Pastoral Zone for wild animal habitat and repurpose historic ranch buildings for scientific research, interpretation, and public education.

Step 2: Go to this National Park Service webpage and click "comment now." You

#7010

Name: Coe, Walter

Correspondence: We are concerned about the NPS draft plan for cattle ranching at the Pt Reyes National Seashore and believe the proposals do not protect the environment nor do they honor the agreement established 44 years ago when Ranchers were compensated for their land and it was agreed they could remain in the park or their lifetime of 25 years. Instead, their offspring have continued ranching without concern for the land, water and its wildlife. It wasn't long ago that because of current practices, 250 Tule Elk died because of drought and fencing. To actually give permission to ranchers to shoot elk if they are believed to be interfering with their ranching is inexcusable.

We believe NONE of the alternatives proposed are compatible with the agreement reached in 1962; however, unless the NPS goes back to the 'drawing board,' only Alternative F appears to be the most feasible.

It is hard to understand why an agreement made between NPS and the ranchers 44 years ago has not been implemented. The Seashore's water, land, and wildlife need to be protected.

#7011

Name: Despain, Kat

Correspondence: The National Park Service Is Sacrificing the Environment for the Perceived Economic Benefit of the Elite Ranching Class

I am concerned about the environmental impacts of NPS's Preferred Alternative B management plan. It seems that the National Parks Service has considered many detailed options for the future of the Point Reyes Seashore. All the plans are well thought, and their impacts adequately considered.

However, one specific plan, Alternative F, has massive benefits over the others.

The National Parks Service has outlined 5 desired conditions for future park management (2-3): 1) preserve ecological function 2) preserve native species, including threatened and endangered species 3) manage invasive, non-native species 4) preserve cultural resources 5) ensure good conditions for public use and enjoyment/visitor experience

Alternative F meets these requirements better than all other alternatives, including NPS's preferred Alternative B.

1) Alternative F best preserves ecological function. a) Alternative F best protects soil. Under alternative F, cessation of ranching would eliminate all impacts on soils associated with ranching (vi). All of the other alternatives, including NPS preferred Alternative B would continue to affect soils because of erosion, compaction, and alteration of soil fertility, primarily from livestock grazing, forage production, high intensity use areas, and manure spreading (vi). i) Soil plays an essential role in ecological function. Soils play an important role in all of our natural ecological cycles-carbon, nitrogen, oxygen, water and nutrient. Soil supports plant growth which in turn feeds native species and fuels the entire system. b) Concerning vegetation, Alternative F is the least risky plan: i) The NPS report claims that the cessation of grazing would eliminate adverse impacts such as high-intensity-use areas and impacts on other federally listed plants that occur in certain habitats, such as dune or serpentine habitat, may be beneficial because the potential for cattle to trample individual plants would be reduced (vii). ii) However, the report also claims that Eliminating livestock grazing [via Alternative F] could also adversely affect several federally listed plants that occur in coastal grassland because grazing is the most effective tool for promoting their persistence with respect to competition with other non-native grassland species (vii). (1) Why is grazing the most effective tool for reducing competition with non-native grassland species? Ranching has goals that are unrelated to preserving native plant species. Wouldnt a targeted park management program that's explicit goal is native species protection, for example, be more effective? c) In terms of maintaining water quality, Alternative F is yet again the best option: 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 (vii). 2) Alternative F is the best solution for wildlife concerns. a) 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. Ecological succession would occur as grassland habitats transition into shrubland or forested habitats, which would increase habitat for some wildlife but decrease it for others. Alternatives E and F would eliminate impacts of forage production, manure spreading, and diversification and would reduce high-intensity-use areas compared to existing conditions (vii) b) Alternative F would eliminate impacts on the native tule elk related to hazing and fencing and would allow for the free-range population to expand across the planning area. i) Alternative F manages invasive, non-native species by ceasing ranching. Livestock animals, by definition, are invasive, non-native species. How can you justify keeping ranching when you have a goal that is explicitly against it? 3) Alternative F would recognize the Point Reyes Peninsula Dairy Ranches Historic District and the Olema Valley Dairy Ranches Historic District listed on the National Register (46). It would still consider the area historic. 4) Under alternative F, removing ranching operations would eliminate a unique experience for visitors to experience the role of coastal prairie 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 reuse 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 (viii) a) Why would visitors want to see a bunch of sick cows (that they can see at farms across the US) when they could see a species that is unique to the area? b) There are zero instances where a tourist stated they were there to see the ranches. Their statement is unsupported c) There is ample ranching on private land that is visible to the public in the area 5) The cessation of ranching under alternative F would contribute to the loss of approximately \$16 million in annual revenue, which constitutes 0.01% of the study areas gross regional product. In addition, 63 direct jobs at ranches in the planning area would be lost, representing less than 0.03% of regional employment. Under all alternatives, visitation levels are not expected to change compared to existing conditions. Therefore, no change to jobs, income, sales, and taxes in the study area are anticipated in the short or long term related to public use and enjoyment. (ix)

The National Parks Service has decided to ignore these benefits in favor of Alternative B. Alternative B mirrors the requests posed by ranchers in a 2014 letter. Alternative B prioritizes ranching over recreation, wildlife and protecting natural resources. It commits our national seashore to commercial cattle grazing for decades to come.

By law, the National Park Service 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.

The long-overdue General Management Plan Amendment (GMPA) for Point Reyes National Seashore must make the preservation and restoration of the parks natural values, its native wildlife, archeological resources, and public use and enjoyment its highest priority.

Ranching on public land is not a right, it is a privilege. Commercial lease holders should not dictate wildlife removal or exclusion policies. Confinement, fencing, removal, hazing, and killing of wildlife in the national park for the benefit of private ranch operators is unacceptable. Given the founding purposes of Point Reyes National Seashore, commercial leases or activities at the Seashore should not conflict nor interfere with the protection of natural or cultural resources or public access to the park.

Tax dollars subsidize ranching in the national park, but taxpayers have limited access to large parts of the Seashores, at times further limited by fences, locks, signage posted by ranchers and beach closings due to pollution caused by ranching. The GMPA must ensure, and the NPS must enforce the publics right to access the park. Why are ranching families given privileges the rest of us are not?

Allowing private ranches to expand operations at the Seashore would reduce public access to the park, damage wildlife habitat, and degrade water quality. I am opposed to the ranchers demand to grow commercial row crops and introduce sheep, goats, pigs, turkeys or chickens to the national park, which would create conflicts with and pressure to kill native predators like bobcats, coyotes, and foxes.

Why are ranching families trusted as stewards of the land when the nature of their work is exploitative?

Alternative F would not allow ranching. It would phase out cattle and disallow domestic livestock in the park. It would prioritize biodiversity and not kill wildlife to accommodate commercial interests. Under this alternative, it will be easier to restore the Seashores Pastoral Zone for wildlife habitat, native plant communities, scientific research and education, and historic ranch buildings can be repurposed for scientific research, interpretation and public education.

You say The purpose of Golden Gate National Recreation Area is to offer national park experiences to all, including a large and diverse urban population, while preserving and interpreting the outstanding natural,



historic, scenic, and recreational values of the park lands (2). Well, I am a part of that urban population, and I want a park, not a ranch.

The National Park Service is subsidizing wealthy leaseholders with the public's tax dollars.

Sincerely, Kat Despain

#7012

Name: Gordon, Monica

Correspondence: I am writing to urge the National Park Service to discontinue the grazing of beef and dairy cattle at Point Reyes National Seashore. This precious area has been damaged by livestock grazing which poses a threat to the environment and local wildlife and it should be protected and used to serve the public good, and not for the benefit of the livestock industry.

I strongly oppose Option B and any other proposal that would be fatal to Tule Elk or other wildlife to the benefit of ranching operations, and encourage the agency to adopt Option F to discontinue grazing and allow members of the public to enjoy this beautiful park and to be enriched with opportunities to visit and appreciate this special place.

The beef and dairy farmers in the Point Reyes area have been given preferential treatment far too long and have been adequately notified that their leases will be terminated upon expiration or sooner if the original farming families cease operation. The suggestion to slaughter native elk and remove access to public land is absolutely unacceptable and could only be promulgated by our currently depraved national administration. This is California! We are better than this.

#7013

Name: Contaxis, Patricia

Correspondence: My daughter and I attended the public presentation in Sausalito on August 28th. I am 63 years old, my daughter is 24. We are both volunteers for the National Park Service.

I came of age during the Cold War, in the shadow of the atomic bomb, and in a political and existential atmosphere of crisis driven by a policy of Mutual Assured Destruction. These concerns seem to have drifted out of consciousness today, although they are still the robust threat they were in my youth.

In middle age, grown used to compromise, lulled into perhaps false hope by the fact that I've made it through decades of adult life skating the worst fear of my youth - that is, nuclear holocaust, either by war or accident - and numbed by the current political atmosphere of winner-take-all bullying and inflexibility, I took in the presentation in Sausalito, and accepted that the National Park Service favors Plan B. I could see that it was the plan that offered compromise between the Park and the ranchers, offering a 20 year lease in which both Park and ranchers could move ahead with their differing goals and objectives, to be re-evaluated around the 20-year mark. I am loyal to the Park, and read into Plan B a kind of respect and willingness to be good neighbors with existing ranchers.

After the presentation, my daughter and I discussed our impressions. As I said, my daughter is 24 years old, coming of age now, in this time of climate crisis and gross indifference to this issue by both science-denying politicians and slow-footed potential allies. Her generation's primary concern, as evidenced during the Climate Strike last Friday, is the climate crisis my generation has largely caused and to which my generation has not adequately responded. I could feel her distress.

I told my daughter that I thought a 20-year lease was a reasonable amount of time for the Park and ranchers to work together, gather data, analyze the results, and make changes to future agreements. 20 years to me, at 63, is not such a big chunk of time - half a career, two-thirds of a mortgage, etc.

To this, my daughter, who has a Bachelor of Science in Environmental Studies, rattled off statistics on ranching, destruction of habitat, increased methane emissions with increased cattle, and the effect on global warming. Her final coup de grace to my complacent, good-neighborly, political weariness was this: "20 years is the time frame in which we either make radical change or face dire consequences."

That woke me up.

It should wake you up, too.

Every single one of us should be doing whatever is in our power to do to make that radical change, to reduce our contribution to global warming, and to put our personal, financial and political resources into practices, technologies and policies that move us away from dependence on fossil fuels, and away from uses of land and water that are inefficient and destructive to the environment.

The Park is in a tough situation. Funded by monies controlled by an administration that seems ready to sell off public lands, to undo everything our country has built-in to protect our natural resources. But administrations come and go. Climate crisis is here to stay. I urge the Park to use this moment to educate the public on the effects of ranching on global warming, and to use this opportunity to work with the local community to develop sustainable food production. To this end, the Park would do well to look at the World Resources Institute at Princeton, which just published an important paper on best farming practices to feed the estimated 10 billion people we will have on our planet by 2050. Below are resources that would serve us all, should the Park choose to address this most important issue of our time, arguably of all time.

Authors: Tim Searchinger, senior fellow at the World Resources Institute and research scholar at Princeton  
Georgina Gustin, reporter for InsideClimate News  
Web Resources: WRI: Creating a Sustainable Food Future  
The Intergovernmental Panel on Climate Change: Climate Change and Land Report  
InsideClimateNews: IPCC Report Shows Food System Overhaul Needed to Save the Climate  
The New York Times: The World Wastes Tons of Food. A Grocery 'Happy Hour' Is One Answer.

#7014

Name: N/A, Lauren

Correspondence: Please do not kill any Tule Elk! I understand the relationship Point Reyes has with ranchers is long-standing, but as a National Park it is essential that you put the well-being of the environment as your highest priority. As a California resident I urge you to move forward with a plan that does not take any lives of the rare and beautiful Tule Elk, and considers the detrimental effects that cattle grazing has on the local ecosystem.

Thank you.

#7015

Name: Musgrove, Donna

Correspondence: I grew up in California and my Parents took me camping in the National Parks. I am shocked you are considering pandering to special interest groups to allow hunting to benefit them. Please stand up for the natural environment and stop this madness!

- Point Reyes National Seashore is supposed to be managed under the Point Reyes Act for "maximum protection, restoration, and preservation of the natural environment." There's no mandate for prioritizing commercial agricultural leases on these public lands.

- Natural values, native wildlife, public access and enjoyment should take priority over commercial activities at Point Reyes.

- Tule elk are an important part of the landscape at Point Reyes. Their recovery is a result of successful native ecosystem restoration, which is a key element of the Park Service's mission. It's taken a lot of time, money and effort to restore tule elk to Point Reyes, the only national park where they live. Tule elk should be allowed to roam free and forage in the park - not shot, removed, fenced or treated as problem animals.
- Right now the Point Reyes ranches enjoy not only subsidized grazing fees and housing, but also taxpayer-funded infrastructure and road improvements, and publicly funded projects. But commercial activities at Point Reyes should be required to accommodate native wildlife - not the other way around.
- The Park Service shouldn't allow any new agricultural activities at Point Reyes. Planting artichokes or other row crops will attract birds. And introducing sheep, goats, pigs or chickens will attract native predators such as coyotes, bobcats and foxes. Expanded ranching would only create new wildlife conflicts.
- Cattle ranching should only be allowed if it's consistent with preserving the natural environment. And agricultural activities such as mowing shouldn't be allowed in park areas where they harm endangered species or wildlife habitat, impair water quality, cause excessive erosion or spread invasive plants/diseases.
- Cattle are the seashore's primary source of greenhouse gases. So the Park Service's preferred alternative is inconsistent with its own "Climate Friendly Parks" plan.

#7016

Name: MOORJANI, LAXMAN

Correspondence: I am very disturbed by what is happening at Point Reyes Seashore due to operation of the Ranches. There is flagrant abuse of natural resources by way of polluting ocean with cow manure and killing native Tule Elks, I would like Park Service to adopt Alternative F. This should include phasing out all ranching, as originally intended. The Seashore should be managed for the natural values it was created to preserve its land, water and wildlife. The Point Reyes National Seashore should be restored and preserved for future generations to enjoy.

#7017

Name: giammona, michael

Correspondence: Giammona Family Ranch

Cicely Muldoon 9-23-19 Superintendent Point Reyes National Seashore 1 Bear Valley Road Point Reyes, CA 94956

Dear Superintendent: Thank you for the opportunity to comment on the draft Environmental Impact Statement (EIS) concerning continued ranching in the Point Reyes National Seashore and Golden Gate) Recreational Area. (GGNRA). This letter is our family's response to the draft EIS.

Ranch specific We have a small Lease in the Olema valley located within the boundaries of the GGNRA, that we have been our family cattle operation on since 1995. Over the last twenty-four years we have concentrated on habitat protection of a small stream that runs on the edge of our border line, by voluntarily fencing it from cattle at our own expense and using the small pasture next to the creek in dry months at very limited times. We are also working with NPS as well as NRCS on a water distribution plan, that would allow us to rotational graze our pastures and distribute the cattle more evenly and allow us to better control grazing to help manage forage intake, as well as help control invasive plant species. Last year with completed a very successful partnership project involving NPS, RCD and ourselves, to improve water quality in the olema valley. Moving forward we are excited about the possibilities to work with NPS on a long-term goal, were we can develop a ranch management plan that can help us implement the best management practices available while being good and responsible environmental stewards of the land

Housing I would like to re-iterate from our last comment letter, how crucial it is, to our ranch operations that we would be able to lease the house on the ranch for a family member or ranch worker to live in. This very critical and would help us better manage the ranch and re-act to possible emergency situations that can occur, from possible animals getting sick and needing crucial prompt treatment, or monitoring the building and culverts during winter storms. As of now, we must make numerous trips to the ranch at all hours of the day and night to check on the cattle during calving season or other situations that need immediate attention. We have had problems with theft and vandalism in the past, by having a family member be able to live in the house on the ranch, it would help eliminate possible criminal activity that's been ongoing for a while, at the same time help us care for the cattle and the ranch infrastructure.

Diversification We think that allowing some types of limited diversification opportunities even under a trial basis could greatly enhance the sustainability of ranching operations, which in turn would increase flexibility of the lease operator to manage the land in a way to help in protecting environmental sensitive areas. In our situation, for example, one of our sons has a pasture egg business outside of the NPS borders, he would like to be able to use one of the barns periodically to raise day old chicks in.

Thank you for the opportunity to comment and look forward in working with the NPS in the future.

Mike, Connie, Ryan and Morgan Giammona

#7018

Name: O'Hara, Janet

Correspondence: September 20, 2019 Brannon Ketcham Point Reyes National Seashore 1 Bear Valley Road Point Reyes Station, CA 94956 Email: brannon\_ketcham@nps.gov

Subject: Comments on Environmental Impact Statement for a General Management Plan Amendment, Point Reyes National Seashore and North District of Golden Gate National Recreation Area, Marin County

Dear Mr. Ketcham:

San Francisco Regional Water Quality Control Board (Water Board) staff appreciates the opportunity to comment on the Draft Environmental Impact Statement (draft EIS) for a General Management Plan (GMP) Amendment, Point Reyes National Seashore (PRNS) and North District of Golden Gate National Recreation Area (planning area). The EIS for the GMP Amendment will establish guidance for all lands currently under agricultural lease or permit within the planning area, relating to preservation of natural and cultural resources and management of infrastructure and visitor use. Based on the information provided in the draft EIS, we offer the comments below. These comments are to advise NPS of our concerns, so they may be incorporated into the planning and regulatory compliance process at an early date. We have focused our comments on the preferred alternative identified in the draft EIS, Alternative B.

We strongly support continued grazing and dairy operations on PRNS lands as identified in Alternative B and the development of longer leases up to 20 years. These longer leases should provide ranches and dairies with the ability to build needed improvements and infrastructure. We will continue to work closely with NPS and ranches/dairies through our permitting and 319(H) grants program to upgrade facilities and eliminate existing water quality impacts. In our work on PRNS lands, we have found that rangeland and dairy infrastructure and operation improvements can lead to significant water quality and habitat improvements.

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.

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).

The draft EIS identifies Alternative B as the preferred alternative. In this alternative, the ranchland zone is divided into Subzones: Resource Protection Zone, Range Subzone, Pasture Subzone, and Ranch Core Subzone. Our comments below focus on Alternative B and activities in the latter two Subzones because this is where most impacts would be expected to occur.

#### Alternative B comments

#### Resource Protection, Range and Pasture Subzones - Vegetation, Erosion and Water

We support the delineation of Subzones as described in Appendix H. The increase of 1200 acres in the Resource Protection Subzone will provide for significant water quality and habitat improvement.

The Pasture Subzone is identified "as lands where no sensitive resources are known to occur". In this area diversification will allow pasture use by sheep, goats and chicken. If properly managed, this diversification should have only minor and limited impacts. However, the draft EIS discussion does not clarify how these livestock and chickens will be managed. What mechanism or BMP prevents the sheep and goats, placed into the Pasture Subzone, from foraging in adjacent areas that are zoned differently and where sensitive resources do exist? Further, will the existing water infrastructure be adequate to effectively rotate the sheep and goats between fields to prevent overgrazing? It is unclear if the measure preventing sheep and goats from moving between Subzones is steep slopes (> 20%) and if so, if this effective. The draft EIS should fully identify the potential impacts to sensitive resources, water quality, and soil in the Resource Protection, Range and Pasture Subzones resulting from diversification in the Pasture Subzone, and how these Subzones will be managed to prevent impacts from goats, sheep and chicken.

#### Alternative B - Diversification - Water Resources

In our comments on the Notice of Intent (Nov. 30, 2018) we noted that the list of Impact Topics should be expanded to include watershed scale processes such as geomorphic and hydrologic processes. Geomorphic processes should include sediment generation and transport processes, as well as stream and floodplain geomorphic functions. Hydrology should include impacts to stormwater runoff characteristics (e.g., runoff volume and timing, percolation, Horton overland flow due to soil compaction); stream flow (e.g., volume, peak flow magnitude and timing, seasonal persistence) and groundwater recharge and discharge. These impacts may be significant in the Ranch Core Subzone (see below) but were not identified and evaluated.

#### Diversification in Ranch Core Subzone

The Ranch Core Subzone comprises a small lease/permit area (< 1% of total). However, the Ranch Core Subzone's potential to increase pollutant loading to streams, groundwater, wetlands, and degrade water quality and sensitive habitat greatly exceeds its relative size and may be very significant. These areas are the most likely of the newly proposed Subzones in the GMP to cause significant water quality and stream habitat degradation under the proposed diversification practices for the following reasons:

1. Location of Ranch Core Subzones: due to historic practice of siting dairy complexes and ranch facilities adjacent to creeks and on flat areas, several core areas are in low-lying areas at the base of a sub-watershed in alluvial fans or historic (now drained) wetlands. These areas are subject to frequent flooding, high volumes of converging stormwater flow from upslope hillsides, and creek planform instability (alluvial fan). Other ranch core areas, situated closer to the ridgetops, may discharge pollutants directly to headwater swales and small tributaries or be susceptible to more extreme weather than low-lying areas.
2. Impact of existing degradation in Ranch Core Subzone: Due to existing degradation of habitat and vegetation, these areas have little pollutant buffering and pollutant assimilative capacity. The proposed diversification activities will generate a higher pollutant loading and direct discharge to adjacent waterbodies in these areas due to a lack of existing vegetative buffers (filter strips, soil vegetative cover, and complex riparian zones. For instance, in many areas an increase in diversified livestock use will generate additional erosion due to presence of bare earth and there will be less pollutant filtration due to the lack of a complex riparian zone.
3. Diversification activities in Ranch Core Subzone: the actual proposed diversification activities have the potential to generate significant pollutant discharges due to the nature of the activities (see below - diversification activity impacts).
4. Technical or financial infeasibility of implementing appropriate BMPs, management or mitigation measures to eliminate or reduce impacts: In some Ranch Core locations, the suggested mitigation measures, such as "comply with requirements in the General CAF permit" may not be adequate. For example, the requirement to eliminate stormwater run-on into areas containing waste products, may be technically or financially infeasible. In the locations where the measures cannot successfully be implemented, there will be significantly greater impacts than identified in the EIS. Further, the actual impacts of installing the necessary measures, for many of the diversification activities have not been fully considered. Examples include: • Rerouting stormwater or altering the drainage patterns in row crop fields which may alter groundwater recharge and affect stream hydrology (low and high flow) • Disposing of manure and urine-soaked bedding in horse boarding facilities, or high nitrogen chicken manure through composting. See also Attachment A of CAF Order No. R2-2016-0031 (General CAF WDR).

#### Impacts from Specific Diversification Activities in Ranch Core Subzone

1. Waste generation: The proposed diversification activities related to increased livestock diversity (pigs, sheep, goats, chickens, horses), horse boarding, and small-scale processing of dairy products may generate wastes that include manure, process wastewater, animal wash water, and any water, precipitation, or rainfall runoff that contacts animal confinement areas and/or raw materials, products, or byproducts such as manure, compost piles, feed, bedding materials, silage, eggs, or milk. Waste from such facilities can contain pathogens, oxygen-depleting organic matter, sediment, nitrogen compounds, compounds toxic to fish and other aquatic organisms, and other suspended and dissolved solids that can impact both groundwater and surface water if not properly managed. Daily operations can cause degradation of water quality as a result of waste discharges and activities that result in soil erosion and destruction of riparian habitat.

Adverse aquatic habitat impacts associated with improper waste management and application may include: nutrient enrichment resulting in algal blooms, organic waste loading resulting in lowered oxygen levels, siltation of gravel areas that can eliminate fish habitat, high levels of ammonia that are toxic to fish and aquatic invertebrates, and elevated levels of nitrates and other salts in groundwater. Additionally, animals whose movement is not controlled through fencing or other methods may further degrade riparian zone, wetland, or other sensitive habitat and lead to further loss of the function of those habitats, including pollutant filtration,

shade and stream temperature control, and streambank and soil stability. The draft EIS does not clearly indicate if the diversified livestock will be corralled/fenced or free range, nor does it identify potential impacts of free range livestock, such as loss of riparian zone and wetlands. If livestock are confined(1), the requirements of the General CAF WDR must be met. Even so, the EIS still should fully identify and evaluate potential impacts associated with CAF operations. As discussed above, the technical/financial feasibility of many of the proposed management and mitigation measures requires evaluation. Where such measures are not feasible, there will be impacts the draft EIS does not currently identify, and the impacts of those identified will be more significant.

2. Row crops: Row crops have the potential to increase soil erosion and discharge of sediment to streams; increase nutrient runoff from manure or compost application; increase the need for invasive plant control, as conditions for invasive plant germination and dissemination are improved (see integrated pest management discussion below); increase soil compaction; alter stormwater flow paths and increase runoff leading to a decrease in groundwater recharge and altered stream hydrology (low and high flow). Some mitigative measures proposed in the draft EIS may provide only limited erosion control depending on the site characteristics. For example, mulching and seeding have variable success at erosion control depending on factors such as slope, wind, soil moisture and temperature. The draft EIS does not fully discuss harvest methods, whose impacts can be significant depending on machinery used. Additional clarity is needed in the description of allowable row crop activities and identifying their impacts.

3. Integrated Pest Management (IPM) for invasive weed control: As stated in the draft EIS, "Vegetation management practices for invasive plants in crop areas would be subject to mitigation measures to minimize or prevent adverse impacts associated with these practices....using herbicides and biocides on cultivated or rangeland areas for purposes of weed management would continue to comply with NPS IPM regulations and procedures. Compliance with these regulations and procedures and applicable handling and disposal laws and the use of appropriate herbicide application methods (e.g., restrictions on spraying during windy or wet days) would minimize or prevent adverse impacts on surface water and groundwater quality." (pg. 115). This discussion does not fully identify the impacts of herbicides on groundwater and aquatic habitats that support salmonids and other species known to be sensitive to herbicides.

4. Public use and enjoyment: the proposed increase in farm tours and overnight use facilities would increase sewage production and water use. The draft EIS does not fully identify or evaluate potential impacts associated with increased sewage generation and appropriate management measures.

5. Water use: the draft EIS does not adequately identify all the increased water demands associated with the proposed diversification, row crop, and public use and enjoyment. The draft EIS identifies the volume of daily drinking water consumption by goats, chicken, and horses, and this increased use is relatively minor. However, numerous water demands are not considered including: pig and sheep daily drinking consumption; wash water needed for horse boarding facilities including horse and stall washing; wash water for management of CAF facilities; water use for public use and enjoyment including overnight facilities (cooking, showers, restrooms, etc.); flower/vegetable gardens associated with landscaping for overnight facilities; crop produce and equipment wash water; cheese making or other commercial process manufacturing water.

This increased water demand could be met through use of existing permitted stored reservoir/pond water, redevelopment of existing wells and springs, or new wells and new surface water diversions. In our work with NPS on existing rangelands, we have supported the redevelopment of existing wells to provide alternate water supply for cattle fenced out of creeks. In such cases, the overall water use is unchanged, and riparian zone and water quality benefits accrue from fencing cows out of creeks. However, we do not support allowing activities that significantly increase water demand, because it may further reduce stream flow, wetlands and groundwater recharge. Research in the Olema Creek watershed by the University of California-Berkeley has found reduced Coho growth and mortality in Olema tributaries due to low flow conditions. Further, increased demand on ponds/reservoirs could result in lowering of reservoir water levels, reduce their capacity to meet demands during droughts, and decrease pond wetland and amphibian habitat. The draft EIS states that no new wells will be

developed. However, the EIS does not identify potential impacts resulting from the development of new water supply reservoirs/ponds or diversions that may be allowed through a state water rights process.

Closing

In conclusion, we strongly support the issuance of longer leases and diversification into the Pasture Range Subzone. Additional clarity is necessary regarding control of livestock movement between Subzones. However, due to the sensitive location of the Ranch Core Subzone, high level of existing degradation, significant pollutant generation by diversification activities, and potential for technical/financial infeasibility of installing mitigation/manage measures, we find the EIS does not fully identify the impacts of Ranch Core Subzone diversification.

Sincerely Janet O'Hara Senior Environmental Scientist Planning and TMDL Division

Copy: State Clearinghouse, State.Clearinghouse@opr.ca.gov

(1) California Code of Regulations, Title 27 section 20164, defines a CAF as "... any place where cattle, calves, sheep, swine, horses, mules, goats, fowl, or other domestic animals are corralled, penned, tethered, or otherwise enclosed or held and where feeding is by means other than grazing."

#7019

Name: owen, mary

Correspondence: They are a natural part of the shoreline and coast of Point Reyes and a beautiful asset to the environment. They deserve to live and be respected

#7020

Name: Bachand, Thomas

Correspondence: It is unacceptable that the National Park Service and the Point Reyes National Seashore management are not in compliance with the park's mission, scientific studies, or public sentiment as it seeks to cull elk so as to perpetuate industrial dairy ranching within the park. I live over an hour from Pt. Reyes and for the past 40 years have visited the park on bimonthly basis. I have found park management to be inadequate and not in the public interest.

As both park and independent studies show, dairy farming is incompatible with preserving park native flora and fauna, promoting biodiversity, protecting surrounding marine environments, enhancing public use, and, on a broader level, addressing climate change.

That the Park is culling the native elk so as to enhance dairy farming is unconscionable. Dairy farming on Point Reyes is responsible for the poisoning of the water and land with their waste, the decimation of native plants due to grazing, the killing of native birds and mammals to maintain pastures and farm silage and hay, the propagation of the predatory crow population, and widespread erosion. All these factors ultimately impact shorebirds and marine life, including elephant seals, sea lions, sharks, plovers, and pelicans. That the park would think that the elk are problematic is an indication of how out of touch they are.

It is insulting to one's intelligence that Park management would attempt to extend dairy leases under the guise that the ranches have historical significance. Marin and Sonoma counties are full of coastal dairy farms. The primary difference between the Point Reyes ranches and those elsewhere is their adverse impact on the truly historic value of the park, namely that it is one of the last vestiges of native coastal prairie and our connection to the landscape through native populations -who have lived in the area for thousands of years.



The ranches have had 50 years to comply with the park's founding legislation. Closing the Point Reyes ranches is long overdue. I will be supporting every effort to make it so.

Sincerely, Thomas Bachand

#7021

Name: Jedlicka, Pamela

Correspondence: I am writing to urge the National Park Service to discontinue the grazing of beef and dairy cattle at Point Reyes National Seashore. This precious area has been damaged by livestock grazing which poses a threat to the environment and local wildlife and it should be protected and used to serve the public good, and not for the benefit of the livestock industry.

I strongly oppose Option B and any other proposal that would be fatal to Tule Elk or other wildlife to the benefit of ranching operations, and encourage the agency to adopt Option F to discontinue grazing and allow members of the public to enjoy this beautiful park and to be enriched with opportunities to visit and appreciate this special place.

#7022

Name: N/A, N/A

Correspondence: I am writing to urge the National Park Service to discontinue the grazing of beef and dairy cattle at Point Reyes National Seashore. This precious area has been damaged by livestock grazing which poses a threat to the environment and local wildlife and it should be protected and used to serve the public good, and not for the benefit of the livestock industry.

I strongly oppose Option B and any other proposal that would be fatal to Tule Elk or other wildlife to the benefit of ranching operations, and encourage the agency to adopt Option F to discontinue grazing and allow members of the public to enjoy this beautiful park and to be enriched with opportunities to visit and appreciate this special place.

#7023

Name: Gross, Mary Ruth

Correspondence: At the time the park was created, ranch owners received financial compensation and 25 year leases, so that there could be an orderly transition back to the native habitat. It is past time for the National Park Service to implement the intent of the National Seashore's authorizing legislation and phase out the destructive effects of dairy and cattle ranching on more than one third of the park. I strongly urge the Park service to implement alternative F and phase out ranching.

The environmental impact of over 5000 head of cattle, with the attendant accumulation of 133 million pounds of manure annually has been devastating for water quality, and soil has suffered from compaction. Cattle have been responsible for well-documented damage to grasslands, birds, native plants, and wildlife. California has many acres dedicated to cattle ranching; it is inappropriate to continue to restrict public access to one third of a National Seashore for the benefit of private ranchers who were never intended to be on the park in perpetuity.

Alternative F is also preferable because it increases land available to the herds of native tule elk, which are compatible with the ecology and do not have a destructive impact on water quality or soil. In contrast, alternative B permits the killing of tule elk for the perpetuation of destructive cattle ranching. This is inconsistent with the interests of the millions of tourists who come to see Point Reyes with its natural geology and ecosystems, including the elk, not dairy and cattle ranches.

#7024

Name: Magee, Martha

Correspondence: LEAVE THE ELK ALONE ! PROTECT THEM!!

#7025

Name: Moorjani, L.Shanti

Correspondence: Dear Park Service,

I was appalled to learn about the plans to kill off some of the Tule Elk, in favor of the cattle industry at Pt Reyes National Seashore. How can this be happening in this day and age when we are all aware of the impact cattle raising has on the land and air of our planet? We have one small pristine place along the coast of California, with indigenous and endangered herds of elk and you are allowing this land to be corrupted. Move the herd of cows away from the seashore, in land and let the park become natural again. This area should be preserved and restored to its original wildness for future generations. I will not buy anymore milk from the companies that are presently entrenched until they leave. How dare you re-issue leases to these farms. The original leases were supposed to be temporary. Is it yet another example of money dictating the decision to extend these leases? Shame on you. You are the stewards of this unique landscape and its natural inhabitants.

The Alternative F proposition should be adopted immediately. The public is beginning to learn about these issues and will not remain silent.

#7026

Name: Hansen, Erin

Correspondence: Please be aware that I feel the Elk are beautiful and in need of our protection. I hope you will feel the same after hearing from Peta and their many supporters.

#7027

Name: Contaxis-Tucker, Brianna

Correspondence: I have read the EIS and attended the public comment educational panel in Sausalito on August 28th. This document predicts the impacts of wildlife, recreation, and ranching on the environment on water, wildlife, and climate. Please follow its advice.

The EIS is structured in order to study the different options of frequency concerning wilderness and recreation land or ranch and pastoral land. The presentation given in Sausalito explained that The Parks Department supports option B. This option would allow for new zoning of ranch lands, extend the use of the land to other livestock and agriculture monitored by the parks, and lethally control the roaming Drakes Bay elk population to 120. Unfortunately, there are some essential environmental concerns within this plan, documented in the EIS. Effects on water quality, wildlife abundance and diversity, and especially climate must hold significance in the final plan decision. As plan B is written, these factors are not rightfully represented.

Cattle, particularly beef cows, in plan A, B, and C leave negative impacts on water and air quality. While plan F or even E allows for new park historical sites and park land supporting Tule Elk, an endemic California species, would support the longterm health of the Park and the people within it. Ranchers claim that elk compete with cows for food. However, elk eat browse, switching between food sources as they run low, explains a 2007 study by David A Christianson and also backed by research by Mark Hebblewhite and the Rocky Mountain Elk Foundation. This allows for native plants to thrive and water to be conserved. In contrast, cows eat a different category of grasses and eat them till the pasture is bare, causing patterns of erosion. This allows high levels of sediment to change the flow of water and nutrients. According to the USDA, especially in enclosed spaces, cows produce 90-120 lbs of manure per cow per year. This then gets in to streams and ground water. The excess

nutrients and ammonia in manure seeped into the watershed cause nitrification, reduced access to oxygen leads to fish and plant death. Additionally, the pesticides used in animal feed and the antibiotics given to the livestock stay in the water, bioaccumulating in the fish and animals who live nearby, and even reaching us downstream. The water quality effects the health of the ecosystem. As we come to the park for the beauty of the landscape, we must protect it.

By the 1960s, we knew, we had clear scientific evidence showing that the earth was warming and that our actions were driving this rapid increase in global temperature. Here we are in 2019, 60 years later, the UN Climate Report just released that we've got 10-12 years to get our act together before we start seeing extreme consequences. These may not effect most average citizens dramatically, but they will effect lower income people living along the coasts, they will effect farm workers and laborers. They will effect how much beach space there is for seals, how far in seawater becomes brackish. The temperature of the water and air will effect fish, plants, songbirds. And native species, endemic species are particularly at risk. Increasing or maintaining ranching within Point Reyes National Park will continue the release of methane, the most deadly greenhouse gas that is doubly as potent as carbon dioxide according to the Climate and Clean Air Coalition. Reducing our consumption of meat and dairy products is the #1 thing that needs to be done to reach our goals for 2020, avoiding catastrophic climate changes. These emissions cannot be removed once they have been released. The Parks Department has the chance to support this change away from meat consumption and protect the climate, protect our ecosystems, and I hope that these factors are carefully thought through in the final decision.

#7028

Name: Smith, Harvey

Correspondence: I have been a Bay Area resident for over 50 and have lived in San Francisco, Marin County and currently reside in the East Bay. I frequently visit Point Reyes National Seashore, the Golden Gate National Recreation Area and other national and regional parks. I also participate in the NPS Volunteer in the Parks program in Rodeo Valley.

I have worked as a horse rancher and environmental educator. I am a former board member of the Alameda County Fair Association and county cattle ranchers among my friends. I currently am part of a group that is the steward of 500 acres of East Bay Municipal Water District lands. We manage this land with about three dozen horses that rotate on about a dozen pastures. The horse grazing reduces the danger of brush fires, and human management of supplemental feeding and removal of invasive species of plants. I mention all this to underscore that management of pasturelands in a park environment is a familiar and longtime personal pursuit.

I am frankly baffled by your Preferred Alternative B that would continue and expand ranching activity in Point Reyes National Seashore. Recent news adds to this bafflement. An estimated more than 4 million people participated in last Friday's climate strike. A reported 3 billion birds have died off in the U.S. over the past 50 years. Milk overproduction in the U.S. was reported again this week. The law establishing the Seashore states that it "shall be administered... 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."

I find it hard to imagine the expansion of agriculture in the park is in line with these legally established administrative guidelines. This seems more like the exploitation of public lands and resources for private gain. We all know that more and more of the public domain has been privatized or is under threat of privatization. However, it is shocking to see this happen here in the Bay Area. Having NPS resources diverted to care for the activities of 24 commercial ranches rather than having them used for the improvement of the park environment or for the benefit of the over two and half million yearly park visitors clearly shows that politics must be driving this EIS process. Is the NPS just going through the motions of getting public input when the outcome has already been predetermined?

There are many examples of dairy and cattle ranches that have been removed from public lands in the East Bay Regional Park District and in Tennessee Valley in the GGNRA. Park visitors may be fascinated by the few historic structures that remain, but I have yet to hear any lament the loss of cattle. However, the resurgence of wildlife and regenerated habitat do thrill and fascinate those who visit parks.

Giving cattle ranchers a free ride in the park without requiring them to contain methane or to move toward more sustainable ranching practices contrasts vividly with the practices of ranchers outside the park who are doing so. Range management practices in East Bay parks also shows that limited cattle or horse rotational grazing can over time improve natural values of the land. Expanded ranching in the park does not move toward restoring its pastoral zones or improving wildlife habitat or native plant communities. It does not improve the water quality or help endangered species - Tule elk and others.

Alternative A – No Action is obviously not working for anyone. Alternative B – NPS Preferred Alternative gives it all to ranching and little to the park and its users. Alternative E points clearly to the most harmful ranching practices for the environment - dairy farming; it should be phased out. Alternative F, discontinuing ranching operations, is posed by some as an extreme alternative, but over time this should be the preferred alternative. Grasslands need to be managed, and alternative F does include prescribed grazing so that cattle will probably continue to be a feature in the park for a long time to come, just not on a clearly industrial and environmentally destructive basis.

#7029

Name: eline, beth

Correspondence: • Point Reyes National Seashore is supposed to be managed under the Point Reyes Act for "maximum protection, restoration, and preservation of the natural environment." There's no mandate for prioritizing commercial agricultural leases on these public lands. • Natural values, native wildlife, public access and enjoyment should take priority over commercial activities at Point Reyes. • Tule elk are an important part of the landscape at Point Reyes. Their recovery is a result of successful native ecosystem restoration, which is a key element of the Park Service's mission. It's taken a lot of time, money and effort to restore tule elk to Point Reyes, the only national park where they live. Tule elk should be allowed to roam free and forage in the park - not shot, removed, fenced or treated as problem animals. • Right now the Point Reyes ranches enjoy not only subsidized grazing fees and housing, but also taxpayer-funded infrastructure and road improvements, and publicly funded projects. But commercial activities at Point Reyes should be required to accommodate native wildlife - not the other way around. • The Park Service shouldn't allow any new agricultural activities at Point Reyes. Planting artichokes or other row crops will attract birds. And introducing sheep, goats, pigs or chickens will attract native predators such as coyotes, bobcats and foxes. Expanded ranching would only create new wildlife conflicts. • Cattle ranching should only be allowed if it's consistent with preserving the natural environment. And agricultural activities such as mowing shouldn't be allowed in park areas where they harm endangered species or wildlife habitat, impair water quality, cause excessive erosion or spread invasive plants/diseases. • Cattle are the seashore's primary source of greenhouse gases. So the Park Service's preferred alternative is inconsistent with its own "Climate Friendly Parks" plan.

I vote entirely on animal and climate issues. I will vote based on how my representatives vote in these crucial matters. You are either for or against the environment If you are against the environment and the animals I am against you.

#7030

Name: Watnick, Darya

Correspondence: I do not support granting 20 year leases to cattle and dairy industry. Climate science has indicated we have less than 12 years to mitigate the worst of climate catastrophe. Allowing business that has been linked to water pollution, species extinction and in Point Reyes is the culprit of over 60% of the greenhouse gas emissions, it is not a good idea to give that same industry a 20-year lease to continue degrading our national park.

Point Reyes is a refuge to thousands of plants and animals. Point Reyes can be a leader in the fight for climate justice, and it starts with phasing out Beef and Dairy operations and restoring the land to its natural state. The EIS has NO MENTION of the effects of climate change in it, and does not include any information of the cattle and dairy's impact on climate change within the park.

#7031

Name: Walensky, Michael

Correspondence: Point Reyes and these elk have been part of my life for almost all off the 50 years I have been living here. I care about protecting California's wildlife. I oppose the National Park Service's plan to kill native tule elk and expand commercial agriculture in Point Reyes National Seashore and Golden Gate National Recreation Area. I urge the National Park Service to instead restore the lands for wild animal habitat.

We should prioritize the preservation of our public lands and wildlife, not the economic interests of private ranchers. These commercial cattle ranches have serious negative environmental impacts on the park - polluting waterways, causing soil erosion, and harming the many endangered and threatened animals who live on Point Reyes. National parks exist to protect our natural resources and native wildlife. This park should be managed accordingly.

Michael Walensky

#7032

Name: Borg, Carolyn

Correspondence: I am very disappointed with NPS because this DEIS is so obviously biased and politically driven. Indeed, five of the six DEIS alternatives would continue some level of commercial livestock operations. The public fairly bought out these ranches decades ago but NPS is too weak to phase them out. NPS violates the law and its own policies to help these "welfare" ranchers. For example, NPS puts private cows ahead of public wildlife, such as ten cows for every tule elk. I support Alternative F as it is the only alternative consistent with the relevant laws, policies, and science. Cows are already ubiquitous on most federal lands in the West. They do not belong in NPS units including this national seashore. NPS managers need to grow a spine and respect that they work for the American people and not a small group of private ranchers.

#7033

Name: Kahn, Charity

Correspondence: Dear NPS,

Please protect our public lands for the uses they were originally intended (protection of biodiversity, land and ecosystems), rather than continuing support the financial bottom line of ranches whose leases were meant to expire decades ago.

I come to the Seashore because I want see the wildlife, not cattle or land heavily impacted and damaged by ranching.

It is my understanding that the mission of national parks is to protect native plants and animals. None of the proposed plans actually do this except for Alternate F, no ranching.

The Environmental Impact Statement says that the land, water, and wildlife of the national seashore are being harmed by the cattle. This is in direct conflict with the mission of the park service.

Please preserve some of our last remaining biodiversity. In an era of climate change and shrinking wildlife, there is absolutely no legal, logical, or emotional argument for continuing to use 1/3 of this precious seashore gem for ranching purposes.

Thank you for listening.

A concerned citizen, Charity Kahn

#7034

Name: Courter, Andrew

Correspondence: Thank you so much for taking this on! Unlocking more, respectful, car-free access to California's world-class natural areas is not easy and I'm grateful you're working on it. Specifically:

I'm writing to support the public access and bicycling improvements outlined under Alternatives B, C, D, E, and F. I strongly support proposals that would lead to the planning and implementation of bicycling routes on trails, ranch roads, and pathways throughout the planning area, including but not limited to: 1) a connection between Devil's Gulch and Platform Bridge Road using existing ranch roads, 2) a connection between Bolinas Ridge Trail at Olema Hill and Point Reyes Station to serve as an interim connection for the Cross Marin Trail, 3) a connection between Bolinas Ridge Trail and Five Brooks Stables using existing ranch roads 4) a connection between Drakes Estero and Abbotts Lagoon Trail using existing ranch roads, 5) a connection between Marshall Beach Trailhead and Pierce Point Road using existing ranch roads, and 6) an Estero Trail loop using existing ranch roads. I encourage NPS to collaborate with ranchers and other stakeholders to educate the public and address concerns related to public access on working ranch lands.

The improvements outlined above would enable and encourage me to visit the Seashore more regularly-and by bike, rather than car. I would feel much safer riding in the Seashore and surrounding areas on trails, pathways, and ranch roads, rather than on roads shared with fast-moving vehicular traffic. Bicycling opportunities are currently very limited and fragmented, so any improvements in connectivity and the creation of new loop options would enable me to enjoy more of the Seashore and surrounding areas by bike.

#7035

Name: Curtis, Gavin

Correspondence: Point Reyes is one of the most scenic areas in the world. Stating the obvious, it has been designated a natural public open space. As such it deserves the opportunity to continue to evolve into its most natural state. Animal agriculture is in direct contrast to this evolution

"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."

This is your mission statement, maintaining a non native animal population in the Point Reyes Park is clearly contrary to your mission.

Please do not allow continued livestock grazing in this pristine area. It has also come to my attention that you may consider trying to adjust the numbers of the native mammals to enhance the land for non native animal grazing and this is truly horrifying.

Please stay true to your mission and choose option F

#7036

Name: Carter, Brenda

Correspondence: I've been visiting Point Reyes since the late seventies, so I have an investment in the Park Service plans for Point Reyes. I'm also a lay person, so I'm not in a position to give the kind of technical response that is crucial to this decision making process. I have done my best to look past the hasty reactions that are widely available and to get feedback from longstanding environmental groups and individuals involved in Point Reyes. I would like to share a few of my concerns based on what I've learned.

My understanding of the the park's mission-and my personal experience of Point Reyes-has always been the shared existence of both the historic ranches and the natural landscape. I'm concerned that proposed diversification based on market forces will upset this uneasy balance that is at the heart of the park. Preserving the ranches is one thing, but I don't see how their commercial sustainability is a legitimate National Park Service management goal.

The proposed forms of diversification will have negative impacts on the park. Allowing non-beef and dairy ranching agricultural practices will open up the possibility of raising sheep, goats, and pigs that will be the target of predators, leading to conflicts with wild life. There are already conflicts between tule elk and the ranches that the park is struggling to resolve. In addition, the possibility of farm stands and home stays shifts the balance away from the park as a place to experience nature. Preserve the beef and dairy ranches if at all possible, but the natural environment of the park must come before their profitability.

#7037

Name: seid, jessica

Correspondence: the ecological sustainability relies on the presence of tule elk being there. expanding ranching area to the highest bidder is not how this should work- -please value ecology and the natural environment over money.

#7038

Name: Machado, Cindy

Correspondence: September 23, 2019

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

Dear Superintendent Muldoon,

On behalf of Marin Humane we are writing to have our comments included in the Point Reyes National Seashore General Management Plan Amendment Draft Environmental Impact Statement (DEIS). Thank you for the opportunity to provide comments in this important process.

Marin Humane's long history dates back to our incorporation in 1907. For over a hundred years our organization has helped guide the values of our community when it comes to animal welfare for all animals, both wild and domestic. Our organization has also benefitted from the rich knowledge of ranchers from the Park who have served on our board of directors over the decades. We have also been deeply involved in local animal issues that involve wildlife management and coexistence, humane treatment of animals, and policies impacting animals and our environment. We currently provide an animal services contract to the County and all 11 cities through a joint powers agreement. As part of our contractual duties we respond to all wildlife and animal-related public safety calls, issue permits for all commercial animal establishments including horse boarding facilities, and issue dog licenses and ranch dog permits. Additionally, our animal services officers enforce all local ordinances involving animals as well as numerous state statutes involving animals, both wild and domestic.

The most concerning element of the majority of the proposed alternatives is the reliance on lethal removal of elk. History shows these methods bring tremendous negative public reaction and litigation. While we support further

study and research on a reliable long-term elk management plan, the importance of promoting proper coexistence and using non-lethal remedies are paramount to success and public support.

We have reviewed the DEIS and appendices and our comments will focus on domestic animal care, elk management, and general wildlife management and coexistence.

Alternative A (No Action) - We do not support Alternative A as a whole and we offer specific comments to the following issues: • This alternative is inadequate in providing a long-term solution for maintaining and effectively managing Tule elk herds in the planning area. • This alternative is deficient in providing proper coexistence between Tule elk, ranchers, park visitors, and neighboring properties. • This alternative has potential for increasing our organization's requirement to respond to wildlife issues, including those involving Tule elk. • We support the continued monitoring of the elk herds and specifically testing for Johne's disease and chronic wasting disease. • We support continued research on elk behavior as well as developing partnerships with other organizational experts to further understanding of elk behavior and management. • This alternative is deficient in providing a long-term elk management plan and specifically no effort has been addressed to consider the use of contraceptives. • This alternative is deficient in requiring improved quality of life and care standards for domestic animals and livestock currently on ranch properties. • This alternative is deficient in providing additional support and information on livestock guarding animals for ranchers. • We support efforts to determine appropriate animal grazing on lands determined appropriate for this activity as well as determining the appropriate number of animal units for these areas. • We support ranch diversification efforts but they are deficient in allowing ranches to be maintained with higher standards around energy use, manure disposal, and other remedies helping to combat climate change as demonstrated by many specialized Marin ranches outside of the Park. • This alternative may be deficient in helping to provide immediate corrections to ranch infrastructures that provide for appropriate shelter, fencing, and water sources. • This alternative is deficient in providing wildlife-friendly fencing. • This alternative appears to be deficient in ensuring all livestock water troughs are equipped with wildlife escape ramps. • This alternative appears to be deficient in providing guidance on pest management. We would support a complete ban on rodenticides and other poisons used on wildlife. We support the use of integrated pest management (IPM) concepts for weed control as outlined in this alternative. • We support continued efforts in this alternative to determine prescribed grazing efforts with ranchers. • We support efforts to eliminate forage production in sensitive wildlife areas as outlined in this alternative. • We support the continued efforts to ensure manure disposal on ranches is regulated pursuant to the California Code of Regulations. We are also very supportive to see this alternative will explore additional state-of-the-art manure disposal systems that have proved to be very successful on other Marin ranches. • This alternative allows in-residence trapping of rodents and bans the use of rodenticides and poisons which we support. We believe this alternative may be deficient in defining "in-residence," and suggest that other out buildings, barns, sheds be included in this language and definition. • As identified in this alternative, we support the continued elk management practices and assistance to ranchers when there are damages or mitigation efforts to maintain peaceful coexistence between elk and ranching, and visitors. • We fully support all efforts to maintain elk management techniques, including herd counting and the use of technology such as GPS collars on elk. Additionally, we support the Park developing a large pool of experts to enable state-of-the-art management plans that are effective, efficient, and valuable to conserving and managing wild elk populations in other areas of the state.

Alternative B (NPS Preferred Alternative) - This alternative appears to be the choice we would generally support, however we have very strong concerns about the lethal removal of any Tule elk. The following are our general comments with regard to this alternative: • We support the concept of "subzones" on individual ranches and we believe this concept may work beneficially for both ranchers and park management. • We support the 20-year terms for individual ranches, especially those with livestock. These enterprises are unique to Marin in the way they are managed and we believe long-term leases will enable park management consistency and will benefit those families willing to work within the Park rules. • We support the Park working collaboratively, as identified in this alternative, with various organizations and stakeholders. • We support this alternative prioritizing the Tule elk herd management in identifying trends, movement patterns, and habitat utilization. • We support this alternative exploring additional multi-use trails as well as improving many existing trails. • This alternative appears to be strongly deficient in the area of personal on-leash dog walking in any area. We would encourage and strongly



support consideration of any new and existing trails or other areas that accommodate responsible dog walking by individual dog guardians. As the Bay Area continues to grow in population and visitors, finding appropriate areas to recreate with family pets becomes more difficult and pushes users to limited areas which can have potential for negative impacts. • The proposed pasture subzone fails to allow compliance with state statutes with regard to providing proper shelter for animals in that it prohibits "permanent buildings." We believe this alternative is misleading and potentially deficient in describing how animals would have access to appropriate shelter in "non-permanent buildings." • We support the individual ranch operating agreements for ranching activities. We believe this document has the ability to determine additional factors for animal care, wildlife management, and potential negative impacts from elk. • We believe this alternative provides significant guidance on determining appropriate animal units on each ranch. We would support the park collaborating with agricultural and range management experts to develop appropriate standards that benefit both the park and the ranchers. • We support ranching diversification efforts in this alternative. Any horse boarding activities are currently monitored and regulated by Marin County Ordinance 8.04.240 and our animal services contract. We would request any new facilities be required to obtain a commercial animal establishment permit through our department. • This alternative is deficient in requiring horse boarding facilities to be in compliance with State Water Resources Control Board regulations, especially those that may end up in the Ranch Core Subzone. • This alternative fails to specify the use of wildlife friendly fencing to exclude wildlife in potential row crops in the Ranch Core Subzone. • This alternative offers misleading information with regard to the term "Guard Animals." All alternatives in this plan should correctly refer to animals (dogs, donkey, llamas, etc.) as "Livestock Guardian Animals." California Health and Safety Code 121881 defines "Guard Dogs and Sentry Dogs" as those used to protect premises against intruding persons. "Livestock Guardian or Guarding Animals" is the proper term that should be utilized for the animals assigned to guard livestock and poultry on ranch properties. We strongly support the use of Livestock Guarding animals on all ranches within the Park. Marin County specializes in having a non-lethal predator program that is the only one in the country. Livestock Guardian Animals and other non-lethal methods of predator control are essential to keep livestock as well as wildlife safe from harm. We support the mitigation methods proposed in this plan, but the proper definition should be utilized. • All canines housed on ranches should be required to be properly licensed pursuant to Marin County Ordinance 8.04.030 or if more than four adult dogs are housed on any property the requirement for a ranch dog permit pursuant to Marin County Ordinance 8.04.246 should be obtained. • This alternative is deficient in requiring proper shelter for animals by the way of proper temporary structures, it only addresses temporary fencing for animals. • We support the fencing in this alternative being wildlife-friendly fencing as well as the proper removal of abandoned fencing. • We support the grazing management in this alternative as outlined in Alternative A above. • We support the manure management in this alternative as outlined in Alternative A above. • We support the pest control restrictions in this alternative as outlined in Alternative A above. • We support all of the management measures of Tule elk in this alternative as outlined in Alternative A, with the exception of our strong opposition to any lethal removal of elk for population management purposes. • We support the use of hazing elk as outlined in this alternative.

Alternative C- We do not support this alternative. See comments made on Alternative A and Alternative B. Additionally, we provide the following comments: • This alternative fails to provide proper elk management techniques and relies on the lethal removal of elk which we strongly oppose. • This alternative inadequately addresses proper elk management techniques by simply relying on population control through only lethal remedies.

Alternative D- We do not support this alternative. See comments made on Alternative A and Alternative B. Additionally, we provide the following comments: • This alternative provides for one-year phase out periods for some ranching and grazing areas. This is insufficient in providing proper notice and alternatives to ranchers in these areas, especially those that house livestock. • This alternative is insufficient for elk management and relies on lethal removal of elk which we strongly oppose.

Alternative E - We do not support this alternative. See comments made on Alternative A and Alternative B. Additionally, we provide the following comments: • This alternative is deficient in evaluating if dairy ranches could be converted to beef ranches in a period of five years. • This alternative fails to disclose if the existing dairy ranches would be appropriate to be converted to beef cattle operations. • This alternative is incomplete in

determining other options for converting dairy ranches. • This alternative fails to provide a long-term elk management plan. • This alternative fails to promote proper coexistence strategies between ranchers and park visitors. • This alternative is deficient in describing the mitigation measures that would be taken for negative elk conflicts.

Alternative F - We do not support this alternative. See comments made on Alternative A and Alternative B. Additionally, we provide the following comments: • This alternative removes ranching from the park. This is in conflict with the park using contracts for livestock grazing. There seems to be inadequate measures described in this alternative for how grazing contracts would be managed and if they would prescribe the same tactic used in Alternative B. • This alternative fails to mention the use of Livestock Guardian Animals for potential grazing species. • This alternative fails to disclose which species of animals would be utilized for grazing purposes. • This alternative is insufficient in providing a long-term elk management plan. • This alternative utilizes lethal remedies for elk population control which we are strongly opposed to. • This alternative is insufficient in exploring the use of contraception options on the elk.

Other Alternatives Discussed but Dismissed from Further Analysis: • Comments do not include information on injection site abscesses of elk being treated for fertility control. This issue may be a result of improper placement of darts, improper dart removal, darting equipment, and improper pressure used in chemical capture equipment. • The findings fail to provide any new research results or current information on PZP and Gonac on which continue to be successfully used around the world on a large variety of species. • Ground darting strategies are important for the success of any contraception plan of wild species. No findings or information has been given on what ground darting strategies were used and why they became insufficient. • Surgical sterilization findings were not thoroughly explored. New techniques in this area continue to be successful in many wildlife management projects. The use of helicopters for this process is only one option. • Translocation research within the Park appears insufficient in numbers for it to be successful. The document describes translocation experiments done in 2015 and 2017 (page 62) on only five elk. We believe the small number of elk involved in this experiment would negatively impact the validity of the experiment. This remains another area that additional research may be helpful in developing long-term elk management plans. • Fencing of elk should remain a serious management strategy for long-term success. Specifics on fencing that works on elk should be tested in key areas of concern. • We strongly support no public hunting of elk on parklands as a management measure. • Hazing methods on elk should be supported. We support not using vehicles, dogs or drones, however there are many additional hazing tactics that may be beneficial and worthy of being tested.

Thank you for the opportunity to provide comment in a variety of ways. We are happy to offer additional expertise on wildlife coexistence, domestic animal care, pet guardianship as well as local and state animal enforcement issues. Please feel free to contact us at (415)506-6209 to discuss any issue in more detail or if we can be of further assistance to you.

Sincerely,

Captain Cindy Machado, CAWA Nancy McKenney, MNPL, CAWA Director of Animal Services Chief Executive Officer

#7039

Name: Flett, Mary Anne

Correspondence: To: GMP c/o Superintendent From: Mary Anne Flett, Wildlife Biologist, Citizen, Taxpayer  
Date: September 22, 2019 Subject: Comments on the Point Reyes National Draft EIS for the Seashore General Management Plan Amendment

I am a local wildlife biologist and naturalist. I have worked in my field for over 40 years. I've lived next to the Point Reyes National Seashore (the Park) for 23 years and know it intimately through hiking, horseback riding, bird watching, and kayaking here since the 1970s. The diverse, rich bird life for which Point Reyes is nationally and

internationally known and the opportunity to live near a beautiful natural area attracted me to live here. I've been leading bird watching trips in the Park and elsewhere in Marin for more than 10 years. I've conducted research for decades on a migratory, endangered bird species that breeds in mountain meadows in the Sierra Nevada. I've seen first hand how management of livestock grazing (beef cattle) and demands for human recreational use on public land impact habitat for endangered birds as well as other wildlife species. These issues are similar to the ones here in Point Reyes National Seashore. My comments are based on a lifetime of professional experience and familiarity with this Park.

The DEIS considers continued ranching but neglects to provide an alternative that prioritizes the Parks unique natural environments and its diverse ecology. The National Parks mission statement is to conserve the scenery and the natural and historic objects and the wild life 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 (Organic Act of 1916). However, there is a complete absence of any alternative that leads with an emphasis on the ecology and ecosystems within the Seashore or addresses how to protect them. There is no discussion about balancing ranching with wildlife (not just Tule Elk) and holistic ecosystem management if ranching is to continue. None of the six alternatives addresses restoration, such as repairing stream banks eroded by livestock, replanting riparian vegetation in places where it used to grow, improving degraded water quality due to runoff from livestock operations. No provisions are presented about how that will be undertaken, funded, and how further damage will be prevented. In my opinion, destruction of Tule Elk herds and degradation of the landscape by ranching and intensive, under-regulated visitor use clearly constitute impairment of enjoyment for future generations.

In short, there isn't any alternative presented in the DEIS that I believe is acceptable and I do not support any of them. I hoped that a new General Management Plan Amendment would improve conditions for biological resources within the Park. Instead, the alternatives consider primarily ranching vs. Tule Elk management, as if those are the only two issues of importance. Although management strategies for ecological function are listed in tables at the end of the DEIS, they aren't included in the alternatives. No mention is made about how the Park plans to implement or fund the measures listed in the table under any of the alternatives. It is a serious oversight and a contradiction of the Parks Mission Statement that the DEIS neither prioritizes nor provides a discussion of a well-thought out holistic ecological program, nor incorporates a plan for restoring degraded landscape, wetlands, vegetation, or wildlife habitats as an integral part of all of the alternatives.

Alternatives that open up more intensive visitor use (opportunities) may result in significant adverse impacts even compared to those caused by ranching operations. If trails, car and boat-in camping, and new trails for hikers and bicycles are opened up for visitors, those users often create social trails and single track bike trails that degrade plant communities and disturb wildlife and habitat. (Also see Recreation, below). Allowing boat-in camping in Drakes Estero Marine Wilderness (and continuing at current levels it in Tomales Bay) would impact eelgrass. Eelgrass is a keystone organism because it hosts multiple species, provides nursery habitat for fish, and it sequesters carbon. Drakes Estero also provides pupping habitat for Harbor Seals, protected under the Marine Mammal Protection Act. Expanded visitor use opens up issues that the Park may not be able to manage effectively in terms of oversight and law enforcement, due to funding and staffing constraints.

Below is a summary of the reasons that none of the alternatives as presented in the DEIS is acceptable to me or aligns with the parks own mission statement:

- None of them is primarily oriented towards protection of natural or biological resources or proposes alleviating or restoring environmental degradation caused by current and past livestock grazing practices.
- Expansion of visitor opportunities proposed in all of the alternatives would increase human traffic and disturbance by opening up new areas in the park. Increasing human disturbance doesn't serve the Parks mission to leave natural resources unimpaired.
- Agricultural diversification, especially for private profit, within a National Park is inappropriate and would likely create conflicts with wildlife. It would also lead to more demand to grow and harvest silage for added livestock types (e.g., pigs).
- Four of the alternatives require lethal extermination of Tule Elk and one (F) allows extermination of elk until the ranches are phased out; this is unacceptable.
- Alternative E allows for conversion of dairies to beef cattle grazing. A deficiency in the DEIS is that tables don't show how many beef cattle AUs are

currently allowed or how many are usually or currently stocked by the lessees. Beef cattle have a huge impact on the land by compacting soil, degrading riparian habitat, eroding drainages and stream banks, and uncontrollably spreading invasive weeds. There is nothing unique about beef cattle ranching as a historic cultural resource in the park; it (and the degradation it causes) can be observed all over the American West. Although prescribed grazing with limited numbers of cattle may be sometimes be useful for managing native plant communities and species, raising beef cattle in Point Reyes doesnt seem to fit the definition of a cultural resource that needs to be preserved for future generations in a National Park, particularly given how many other opportunities there are to experience this elsewhere.

(photo) Beef cattle at D Ranch on September 22, 2019. (Note overgrazed and denuded landscape in this location)

I would choose Alternative A, if forced to support one of the alternatives presented in the DEIS. This alternative maintains the status quo and does not allow for extending 20-year leases to the ranchers. This seems to be the best approach until such time as the Park can come up with alternatives better than those presented in this DEIS. Shorter-term, rather than 20-year, leases would allow more timely adaptive management adjustments and would allow the park to work with or evict ranchers who violate their agreements and ignore protective measures for natural resources. Alternative A does not allow expanded diversification such as row crops (including small vineyards, etc.) and other types of livestock production. It would also keep human use at, or near, the same level as it is now rather than expanding visitor opportunities (read: impacts) in new areas of the Park with unforeseen consequences. However, in order for me to support Alternative A, ranching practices would need to change - a lot. The Park would need funding and more staff to hold ranchers to agreements and to implement measures that protect natural resources and keep the Tule Elk alive, remediate problems such as controlling Common Raven numbers and growing silage, and to instigate restoration of degraded habitats and water quality.

If any alternative including ranching is adopted, the following points must be addressed: RANCHING AND WILDLIFE

The Park, funded by taxpayer dollars, has expended huge amounts of effort and money towards re-establishing the Tule Elk herds and they are a native species that belongs here. According to the Parks 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. If there isnt enough forage to support both elk and cattle, it is the number of cattle that should be reduced, not elk. Tule Elk numbers will eventually have to be managed by humans due to lack of natural predators in the Parks ecosystem. But, as grazers, they could serve the same function as beef cattle if cattle were removed from the park. Tule Elk would reduce cover to benefit native plant communities and rare species, limit vegetation that could fuel a wildfire, and maintain grassland habitats for native wildlife. Tourists appreciate the parks wildlife and often stop to watch elk, coyotes, and occasionally, bobcats, gray foxes, or badgers and I doubt that most of them visit Point Reyes with the desire to experience the everyday function of a modern-day cattle ranch. Preserving Tule Elk populations is historic and also consistent with the Parks stated mission, which is to leave them unimpaired for the enjoyment of future generations.

Livestock numbers should be monitored and maintained at a level that the land can support. Grazing practices should be conducted in a manner that preserves the land and soil, enhances native plant communities, and provides ideal habitat for all native species, not just those that are federally and state-listed. Current conditions on some of the ranches include compacted soil, little to no remaining biomass at the end of spring and summer due to grasses and forbs that have been grazed down to nothing, and invasive weeds associated with disturbance and seeds in imported hay. If ranching is allowed to continue in the Park, there are examples of innovative ranching practices available as models to guide management in Point Reyes. TomKat Ranch in San Mateo is one example (<https://tomkatranch.org/who-we-are/>). Cal Polys Swanton Pacific Ranch in Santa Cruz County is another (<https://spranch.calpoly.edu>).

There is no provision for restoring degraded habitat in any of the alternatives. Restoration should be required under any alternative that is adopted in the General Plan Amendment and the DEIS needs to address this.

Ranchers and the Park must work together to repair and restore eroded waterways and to replant riparian vegetation where it formerly grew. A specific plan should be presented for restoring trampled and compacted wetlands. It should include how these habitats will be re-planted and monitored. Success should be guaranteed over time. High water quality standards should be reinstated and maintained throughout the Park with performance standards and monitoring included in the plans. The DEIS should discuss how such efforts could be funded, when it can begin, to what standards it needs to conform, and who will be responsible for implementing the restoration. If a rancher repeatedly allows cattle to escape into fenced-off protected habitat, the Park needs to follow up with consequences such as a reduction in allowable AUs or even non-renewal of their lease in case of repeat offenses.

Diversification practices that allow row crops (potentially including small-scale vineyards), pigs, sheep, goats, and chickens on the ranches will cause conflicts with wildlife. Crops will attract raccoons and other foragers that could reduce or decimate produce; chickens and other livestock will certainly attract predators. Ranchers would then ask the park to control or exterminate these animals (in the same spirit that is proposed for managing Tule Elk who graze on ranch lands) or worse, take matters into their own hands. According to the DEIS (p. 38), Any new diversification of livestock or row crops in the preferred alternative specifically prohibits management of predators and other wildlife by ranchers. Although the Park claims that ranchers will not be allowed to control predators if diversified activities are allowed, I doubt that the park has the resources or funding to oversee this., For-profit businesses do not belong on public land in general and it is not the National Park Services responsibility to ensure profitability of the ranches. If diversification is allowed in Point Reyes and ranchers are permitted to sell dairy products, eggs, produce, etc., the products should be sold through Point Reyes National Seashore Association and the profits reinvested into the Park to fund natural resource protection, restoration, and enhancement projects.

Eliminate the practice of growing and mowing silage for dairy cows (Ive commented on this at every opportunity in the past) and do not allow more land to be dedicated to silage production. If diversification is allowed on ranches, ranchers will request permits to grow (and harvest) more silage to feed pigs and other animals than they now grow only for cattle. Growing silage attracts nesting birds and small mammals and provides cover and forage for animals. The practice creates an ecological trap by displacing and destroying nests when the fields are mown. Ground and near-ground nesting bird species such as Grasshopper Sparrows (a declining species, listed in California as a Species of Special Concern), Northern Harriers, and California Quail are most vulnerable to mowing during nesting season. Secondary impacts of silage harvesting include attracting Common Ravens and other scavengers into the area who then feast on snakes and mammals that have been exposed or killed during mowing.

I have observed more Common Ravens in the Park in 2019 than ever before. There were 75-100 Ravens in the field at I Ranch in August, presumably attracted to seed in cattle manure. Jules Evens addresses the Raven issue in his comments on this DEIR (pers. comm.), and provided a photograph of 24 Ravens at a trough at B Ranch. They are intelligent and opportunistic and they prey on Snowy Plovers, Red-legged Frogs, and other bird and mammal species present in the Park. Snowy Plovers are federally listed as Threatened and California state-listed as a Species of Special Concern. State Parks (Big Basin, Butano, Patricks Point, Prairie Creek) provide strict guidance for visitors in order to prevent expansion of Corvids in their parks as a way to prevent predation on a different Special Status Species, Marbled Murrelets. If ranching continues in Point Reyes, the park should double down on Raven control measures including requiring tourists to carry out or dispose of trash and excess food, instigating trapping programs, and requiring ranchers to cease practices such as spreading manure and feeding grain in locations where Ravens can access it.

Tricolored Blackbirds, a nearly endemic species in California, are state-listed and rapidly declining. Small numbers of these birds formerly bred in western Marin County annually during the late nesting season (July-September; thought to represent second breeding attempts by birds that previously nested elsewhere until 2003 (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 occur during the fall and winter on the dairy ranches at the outer peninsula of Point Reyes, where they feed on insects, seeds, and undigested grain associated with cow manure in the loafing areas. This is an upside of dairy ranching that supports the notion of retaining at least some dairy ranching in the Park.

(photo) Dairy Cows and Tricolored Blackbird Flock at B Ranch, September 22, 2019.

There are some benefits to ranching in the Park; I'm not necessarily in favor of full-scale eviction of ranching operations. I like the dairy cows and it is a less-common opportunity to see a working dairy operation than it is to see beef ranching. However, if the ranches stay, the number of them should be reduced and they should be managed with innovative methods that prioritize and ensure the health of native organisms and ecosystems in the Park. There should not be for-profit businesses associated with them.

It is within the Parks mission to protect bird life and habitat for the enjoyment of future generations. 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 has been lost since 1970. Grassland bird species have declined by 720 million, a 50% population loss. Given these sobering declines, every measure to protect birds should be implemented in the Park, including protecting grasslands and other habitats from degradation by livestock and high-impact human recreation. Ranchers must abide by the federal Migratory Bird Treaty Act and the California Department of Fish and Wildlife laws protecting migratory and native birds, which includes not mowing silage and conducting other activities that cause take or harm to nesting birds during nesting season. The Park should require ranchers to abide by these laws.

Ranchers should be required to maintain their buildings and facilities to a reasonable standard and clean up their facilities and yards, including junk piles of abandoned appliances, vehicles, and toys. (photo) Mess and Junk pile at A Ranch, September 2019.

No outdoor cats or outdoor feeding stations should be allowed in the Park. An American Bird Conservancy report (2006) on the impacts of outdoor cats says that loss of habitat and fragmentation due to human development are the primary causes of bird population declines worldwide. Invasive species, including cats, are the second most serious threat. They also state that scientists estimate that our nations 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.

(photo) Outdoor cat feeding station at A Ranch, August 2014; feeding continues into September 2019.

## CULTURAL RESOURCES

Why are cultural resources in the park defined as historic ranching and not inclusive of the indigenous people, the Coast Miwok? This appears to be an oversight that disrespects the Parks original inhabitants.

The history of bird watching in the park should also be considered as a historic cultural resource. Over 50 years ago the well-known naturalist and ornithologist, Rich Stallcup, discovered the phenomenon of lost, vagrant migrating birds that land in the non-native pines and cypresses in Outer Point Reyes to rest and forage. Point Reyes also supports rich and diverse habitats for birds and this, together with the opportunity to view out-of-place migrants, attracts local, national, and international visitors to the Park. The DEIS should provide measures to protect historic habitat used by vagrant birds and specifically continue to allow for bird watching opportunities and access for the public.

## RECREATION

Expansion of bike trails into the park would increase human disturbance to wildlife, cause erosion on dirt trails, and make single-track paths where they shouldn't be. It's well known and documented that mountain bikes disturb

trails and cause erosion. They disturb the peace for people who desire to hike in peace and quiet without disturbance by fast-moving bicycles. Adding additional horse-boarding facilities is not appropriate within the park. Five Brooks facility provides regular horse rental rides that are eroding the trails nearby, particularly along the south side of the pond. Manure loads on the trail surrounding the pond, particularly the south side, is probably a source of high-nitrogen runoff into the pond, whose surface is now covered with Water Fern with invasive Parrots Feather weeds growing along the margins. Large-scale trail-based events are completely incompatible with the Park mission and are inappropriate in a National Park. There are visitors camping at Kehoe and Limantour Beaches on weekend nights, 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, and trash and human waste along trails and roadsides throughout the Park. Park personnel are already over-taxed and often unable to deal with or respond to these problems. It can be assumed that there would be similar issues if more facilities were added at Drakes Estero. As a Marine Wilderness area, Drakes Estero is unsuitable for camping.

How would the Park fund oversight and maintenance if there were more visitor facilities within the Park?

Farm stays, B&Bs, tours, cheese-making operations, sales of produce, eggs, or dairy products or any other private, for-profit enterprises on should not be allowed on the ranches. They are inappropriate in National Park or other public lands (see discussion of diversification, above).

Thank you for considering my comments. They are written with deep appreciation for the native environments, wildlife, and plants within the Park, for the efforts that the Park supervisors and biologists have made on behalf of the Seashores natural resources, and in hope that the new General Plan Amendment can improve on the efforts that have already been made to preserve our beautiful Point Reyes National Seashore.

Mary Anne Flett

#### REFERENCES

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Pennisi, Elizabeth et al. 2019. Science 20 Sep 2019: Vol. 365, Issue 6459, pp. 1228-1229.

Stallcup, R. 2004. Late nesting Tricolored Blackbirds in western Marin County, California. Central Valley Bird Club Bulletin 7:51-52.

#7040

Name: Hazelton, Judith

Correspondence: Do not sacrifice wildlife for greed, wildlife & protected wilderness are much more valuable, once gone they are gone forever.

#7041

Name: Sousa, Paul

Correspondence: Western United Dairies (WUD), a statewide dairy producer trade association that represents dairy producers on a variety of issues, including six dairy farm-members located within the Point Reyes National Seashore (PRNS), offers the following comments on the draft Environmental Impact Statement (EIS) for the General Plan Amendment. First, it is important to mention that PRNS exists because the dairy and ranching families of Point Reyes voluntarily sold their land to the National Park Service with the understanding that dairying and ranching would continue to be a part of the historical and active function of the new park upon its creation. These families have a multi-generational relationship with the land that they steward within the park, and are a vital part of the culture of the park as it exists today. 1) We believe the Park Service should establish an Agricultural Advisory committee to provide input on the agricultural land uses within the Park. Decisions that affect dairy and ranching families within the Park must be made with input from those with working knowledge of farming practices, markets, economics, and regulatory factors. 2) The document must include a discussion on the importance of dairying and ranching to the creation and ongoing purpose of the park and surrounding community. 3) Elk should be excluded from the ranch land at the park. It has become apparent that the conflicts between cattle and elk in the park do not allow for viable ranching within the ranch lands. The elk consume forage, damage fences and other infrastructure on ranch lands and present a risk to the safety of livestock.

We would add that we are in full support of the detailed comments submitted by Point Reyes Seashore Ranchers Association, but would like to call out the above comments as specifically crucial to the success of our dairies within the PRNS. Dairying and ranching have a long history at Point Reyes, including the formation of the Park as we know it today. Ranch families were assured that they would have a place in the park to maintain that history and ongoing way of life, and ranchers should have a voice in this process as their livelihoods are on the line in the decisions reached on this issue. Thank you for the opportunity to comment and feel free to reach out to WUD if you have additional questions.

#7042

Name: Scholten, Fritz

Correspondence: Hello, being 66 years old, with two artificial hips and enjoying the OUTDOORS, the invention of Electric bikes gave me back a part of freedom. I support opening up all public lands to bikes, including Bikes. I agree support that there should be speed limits of 12 to max. 15 miles/h. Regards Fritz Scholten

#7043

Name: Rogers, Dan

Correspondence: As a long-time visitor to our glorious National Parks, I urge the NPS to do what is right and eliminate all ranching and dairy operations from Point Reyes National Seashore. This will protect the Tule Elk populations, and restore the park to its original beauty. There is no excuse for the NPS to support a narrow agricultural policy at the expense of wildlife, and the elk have far more right to be at the park than the ranchers and farmers do. Ranching and dairy operations should have never been allowed in the park, and their operations should cease immediately.

The National Park Service's mission statement states that it "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." In order to live up to your own values, you owe it to the country and to the native species at Point Reyes to rid the park of all dairy and ranching operations forever. Thank you.

Regards, Dan Rogers

#7044



Name: Hetherington, Kathryn

Correspondence: I support Alternative F. Beef and dairy production should be decreasing, it is deeply worrying that it is even a consideration to increase cattle and dairy ranching in this area of natural beauty and wildlife. The effects of climate change are threatening our way of life now and in the future our children are going to suffer immeasurably. 2019 is being dubbed the 'year of the vegan' but in the least humans should be greatly reducing their meat and dairy intake. Cattle and dairy ranchers are not interested in the health of consumers and sustainability of our planet and they have already stayed beyond the initial period of time that was originally planned. Animal agriculture is a violent and destructive industry and is responsible for a fifth of greenhouse gas emissions. We are living in a State that is drought prone and while we take shorter showers, do not water our gardens or wash our cars, dairy farms are using millions of gallons of water per day in milk production and using taxpayers money to do this. We are teaching our children to reduce, reuse and recycle yet the adults are meanwhile killing their planet and extinguishing so many different animal species. This is the home of the Elk not the rancher. We must stand for those who are voiceless.

#7045

Name: Schnapf, David

Correspondence: I have in the past twice submitted comments on the NPS plans for PRNS. My prior comments are incorporated by reference as though fully set forth herein.

The draft EIS is legally deficient and subject to challenge for at least the following reasons.

- 1) It ignores the legal mandate about how PRNS should be managed.
- 2) Other than the "no action" alternative, it fails to present or analyze alternatives that do not involve ranching. Specifically, it fails to present or analyze alternative uses for the park, such as more diverse recreational activities that are in harmony with the use of the land as a National Park.
- 3) It fails to adequately address regional impacts of subsidized farming in view of prevailing economics of farming in the region. In my prior comments I submitted clear evidence that continued ranching in the Park would mean the demise of other farms in the region, which would, in turn, result in farmland being converted to more intensive uses. This will have a profound effect on the region.
- 4) It fails to adequately analyze the effects of the green house gas emissions associated with ranching. PRNS will become the biggest source of greenhouse gas emissions in the county.

#7046

Name: Saied, Donya

Correspondence: To the National Park Service:

As a taxpaying citizen who is gravely concerned about all misuse of tax dollars, and misuse and abuse of public property, I am vehemently against Point Reyes private ranching companies and the NPS conducting deadly, destructive activities that will result in the shootings of rare California Tule Elk. As administrators, you are accountable for any corruption taking place on public land on your watch. The fact that ranchers receive taxpayer-subsidized grazing leases and handouts in the form of housing far below market value in a NATIONAL PARK intended for the benefit of me and everyone in the Bay Area, California, and America is terrible. In fact, NPS should officially recognize that cattle grazing is an outdated experiment in the land management practice at Point Reyes--because now that the Tule Elk population is recovered, growing, and thriving, the cattle are unnecessary for vegetation management and should be phased out entirely.

In regards to this specific the proposal:

- First, cattle companies should have to pay the market rate for anything they take from the me, all taxpayers, and America. These leases need to be re-negotiated and/or terminated.

- Second, taxpayers bought and maintain Point Reyes for the sake of our burning conviction that God's creation, nature, with its breathtaking awesomeness, majesty, and beauty that glorifies God, must be saved and shared with the world, our children, and generations to come. Taxpayers across the country, tourists coming from across the region who boost the economy, and fee-paying visitors who pay to see nature, not cows, demand that our majestic, rare, and inspiring Tule Elk be protected and not butchered. The herd size should be managed by acts of God and predators, as nature and the American people intended when they set up the NPS.

-Third, ordinary, privately-owned cows are eating hay or grass are everywhere and anywhere in the country, and their owners do not have the right to perpetually be on any NPS or American public land, and any leases should be terminated especially in cases such as this one - - where serious threats are being made against the lives the land is legally required to protect and enhance. Cows should be removed so that the taxpaying American public who owns the land can enjoy and protect our Tule Elk - - we have paid so much to restore, preserve, and conserve the Tule Elk. The cows can go back to whatever barn or pasture they came from.

- Fourth, the irreplaceable heritage of Point Reyes National Seashore is a being threatened by grazing and associated unnecessary and destructive behavior. As NPS administrators your job is to ensure "maximum protection, restoration, and preservation of the natural environment." Do not fail!

In conclusion, Tule Elk should be allowed to roam free and forage in the park - not shot, removed, fenced or treated as problem animals.

Taxpayer, citizen, anti-corruption advocate, and American, Donya Saied

#7047

Name: LaPenna, Jeff

Correspondence: As a member of the California-based international animal protection nonprofit organization In Defense of Animals with over 250,000 supporters, I oppose the National Park Service plan to kill native Tule elk, grow commercial crops, and permit ranchers to add chickens, turkeys, sheep, pigs, and goats to their exploitative operations. For this reason, I support Alternative F.

As national park land, this property was specifically set aside to protect, restore, and preserve the natural environment including the wild animals who live there. The original intention was to phase out dairy and cattle ranching, not add more crops or animals to increase ranching profits.

The proposed plan does not address the damage from grazing, including water-quality degradation and soil erosion. Also, adding new crops will create more conflicts with native wild animals.

Please abandon this inhumane and destructive plan by selecting Alternative F. I urge you to restore the Seashore's Pastoral Zone for wild animal habitat and repurpose historic ranch buildings for scientific research, interpretation, and public education.

#7048

Name: Barnett, Lindsay

Correspondence: To whom it may concern:

I am writing to urge the National Park Service to discontinue the grazing of beef and dairy cattle at Point Reyes National Seashore. This precious area has been damaged by livestock grazing, which poses a threat to the

environment and local wildlife. The Point Reyes National Seashore should be protected and used to serve the public good, not for the benefit of the livestock industry.

I strongly oppose Option B and any other proposal that would be fatal to Tule Elk or other wildlife to the benefit of ranching operations, and encourage the agency to adopt Option F to discontinue grazing and allow members of the public to enjoy this beautiful park and to be enriched with opportunities to visit and appreciate this special place.

Please do the right thing for citizens and wildlife, rather than prioritizing a damaging for-profit industry.

Thank you for your attention to this matter.

Sincerely, Lindsay Barnett

#7049

Name: Gibbs, Carolyn

Correspondence: We need to protect these areas - we have taken so very much from this earth and from the animals - please leave this area alone

#7050

Name: Evans, Jon

Correspondence: The preferred alternative is bizarre and wrong. This is a park. It is irreplaceable and irreproducible. There should be fewer-trending-towards-zero ranches and more elk, rather than the other way around.

#7051

Name: Porter, Jane

Correspondence: President Trump's National Park Service has put out a shocking plan to kill native tule elk in California's Point Reyes National Seashore, the only national park where these rare animals live.

The agency would shoot up to 15 elk every year to appease private livestock owners who enjoy subsidized grazing of their cows on this precious public land. Its plan would enshrine private, for-profit cattle-growing as the park's main use - while doing little to rein in the damage from grazing, including water-quality degradation and soil erosion.

But that's not all. The plan would allow conversion of park grasslands to artichoke farms and row crops and let ranchers introduce sheep, goats, chickens and pigs - a recipe for even more conflict with native wildlife.

#7052

Name: Thomas, Skyler

Correspondence: Please consider Alternative F. Dairies, ranching, and agriculture are not rare or special in Marin County nor even in California, in fact it is a state dominated by agriculture. What this seashore has to offer is what is rare and special and the locals have benefitted greatly from its existence. Imagine how much more tourism could still be increased if the rest of the seashore was restored to even half its potential. As of now, tourists drive past the overgrazed pastures to reach a handful of destinations that are still attractive enough to entice recreational users. These desired areas have one thing in common - they are free of ranching activities. Your own responsive management survey confirms that the public asked for a reduction in ranching and an expansion of wilderness. Documents published on your own website and studies conducted on behalf of the seashore show that ranching is having a devastating effect on the habitat in Point Reyes. Pretending that the already poor state of

land management can possibly improve by expanding ranching defies reason. FOIA documents show that the ranchers have been bad tenants, expensive, lease-violators, and difficult to work with. There is more to life than money and protecting your careers. Do the right thing, make a public stand, and you will be remembered for it.

#7053

Name: Poletti, Monica

Correspondence: I'm writing to voice my support for eliminated or reduced ranching and no lethal intervention in the Tule elk population in Point Reyes and the north district of Golden Gate National Recreation Area. First and foremost, I support allowing Tule Elk to continue to live, roam, and establish new herds as naturally as possible, with no lethal population control if human intervention is necessary. I also support reducing infrastructure from ranches as much as possible from these areas, allowing only grazing cattle in areas that involve vegetation other than just grasses and shrubs. I believe that the natural plants and animals of Point Reyes would thrive the best in these circumstances, and the overall ecosystem health, from soil to water to air quality to wildfire impact, would improve greatly across the board.

Tule elk are vital to the health of the Point Reyes ecosystem. Their grazing habits actually improve biodiversity in grasslands and native plants, and they help to keep understories and forest floors less dense, leading to more sustainable plant growth, and more importantly, less wildfire damage. A less dense understory leaves larger trees more likely to survive wildfires, which in turn leads to more stable and nutrient-dense soils, fueling healthier plant life in the perfect cyclical way that only a healthy ecosystem can accomplish. Allowing their population to increase naturally would bring their benefits to parts of Point Reyes that they currently can't reach.

While opposed to cattle grazing because of pollution and related environmental stress, reducing grazing cattle populations and allowing silvopasture in designated forested areas instead of focusing cattle only on grasslands could have some of the same benefits as allowing Tule elk herds to expand and roam freely. Cattle becoming part of the ecosystem is key to its longevity in Point Reyes and should be considered a top priority when it comes to environmental and socioeconomic sustainability.

Allowing elk populations to grow into new areas (and potentially a small number of cattle to graze amongst forests) will improve the health of the natural landscape with minimal impact and invasion. In turn, because Californians love recreation, the NPS would be able to consider more integrated and less invasive trails and camping options (meaning minimal pavement and infrastructure), even if they are in areas where elk or cattle could be encountered. If beef and dairy cattle infrastructure is allowed to remain in place and the Tule elk population is lethally managed, I would strongly oppose any expansion to recreation options in Point Reyes, as the existing impact on the ecosystem would already be quite sizable, less robust, and more susceptible to damage from human activities.

Thank you for reading these comments and I hope you consider them in your review.

#7054

Name: Eidson, Robert

Correspondence: There is no intelligent purpose in changing the status of this site. development isn't even profitable. This describes the entirety of the dumpth fool actions throughout his pretend presidency.

#7055

Name: Frost, Shelley

Correspondence: I support the Tule Elk, not the cattle farmers. I urge you to NOT allow the killing of natural habitants of this eco-system in order for unnatural animals to take their place. This is wrong on so many levels. Save the Tule Elk and stop cattle ranchers. Thank you!

#7056

Name: MacKenzie, Michelle

Correspondence: I am a lifelong California resident and lover of our native wildlife. I live in Northern California and have visited the Point Reyes Seashore many times, camping and hiking there many times. We love to see the elk and other native creatures who call Point Reyes home.

I vehemently oppose Alternative F which would permit the National Park Service to kill these native Tule elk, grow commercial crops and allow I oppose the National Park Service plan to kill native elk and grow commercial crops. The alternative would also allow ranchers to keep additional domestic livestock, including pigs, sheep, goats, chickens and turkeys.

Point Reyes National Seashore is not a farm. It is a national park, designed to protect, restore and preserve land for wildlife. When it was created, the National Park was intended to phase out livestock ranching yet this alternative would add additional farming and ranching to the park and allow ranchers to increase their business opportunities. This is against the original intent behind the creation of the National Park.

Grazing is well documented to cause damage to land. Livestock displaces native wildlife. Soil is eroded and water quality is degraded. Riparian areas suffer damage. Allowing crops to be grown would potentially displace native plants and create more conflict with wildlife.

Alternative F is a terrible plan. It is inhumane. It is against the original intent of the park. It is bad for our wildlife and native plants. Instead, we should be working to restore the land and expand wildlife habitat. Please reject Alternative F - from a native Californian. Farmers have lots of land in California. Wildlife - particularly Tule elk - have very little land. Lets give Tule elk priority at the Point Reyes National Seashore.

#7057

Name: Kasper, Tanya

Correspondence: Please do the right thing and protect our wildlife and our public lands. As a member of the California-based international animal protection nonprofit organization In Defense of Animals with over 250,000 supporters, I oppose the National Park Service plan to kill native Tule elk, grow commercial crops, and permit ranchers to add chickens, turkeys, sheep, pigs, and goats to their exploitative operations. For this reason, I support Alternative F.

As national park land, this property was specifically set aside to protect, restore, and preserve the natural environment including the wild animals who live there. The original intention was to phase out dairy and cattle ranching, not add more crops or animals to increase ranching profits.

The proposed plan does not address the damage from grazing, including water-quality degradation and soil erosion. Also, adding new crops will create more conflicts with native wild animals.

Please abandon this inhumane and destructive plan by selecting Alternative F. I urge you to restore the Seashore's Pastoral Zone for wild animal habitat and repurpose historic ranch buildings for scientific research, interpretation, and public education.

#7058

Name: Mesney, Barbara

Correspondence: I lived in the San Francisco/Bay Area for sixteen years and can testify to the value and importance of Point Reyes and the surrounding headlands as a vital resource to the Bay Area community and to the wildlife that live there. As a plant-based environmentalist who's number one issue is our Climate Crisis, i am appalled that our National Park Service would even consider adding to this worsening problem by the addition of

cattle. We need to be moving AWAY from this paradigm, not contributing to the death of our species and all life on this planet.

I deeply care about protecting California's wildlife. I STRONGLY oppose the National Park Service's plan to kill native tule elk and expand commercial agriculture in Point Reyes National Seashore and Golden Gate National Recreation Area. WHAT AN APPALLING PROPOSAL.

I urge the National Park Service to instead restore the lands for wild animal habitat.

The BLM has had its way for far too long with protecting their private interests on our public lands, nationwide. We should prioritize the preservation of our public lands and wildlife, not the economic interests of private ranchers. These commercial cattle ranches have serious negative environmental impacts on the park - polluting waterways, causing soil erosion, and harming the many endangered and threatened animals who live on Point Reyes. National parks exist to protect our natural resources and native wildlife. This park should be managed accordingly.

I ask you to please reconsider this plan. PLEASE HELP LESSEN the demand for animal products-meat, dairy, poultry-and usher in an era of global healing, not continued desecration of our environment and wildlife. We need to GET REAL about the global Climate Crisis. We already know that Big Ag contributes MORE emissions than the entire transportation sector. THIS HAS TO STOP.

Thank you for listening and ACTING in accordance with the current situation.

Barbara Mesney

#7059

Name: Feldhake, Madeline

Correspondence: Hi!

I am writing to urge the National Park Service to discontinue the grazing of beef and dairy cattle at Point Reyes National Seashore. This precious area has been damaged by livestock grazing which poses a threat to the environment and local wildlife and it should be protected and used to serve the public good, and not for the benefit of the livestock industry.

I strongly oppose Option B and any other proposal that would be fatal to Tule Elk or other wildlife to the benefit of ranching operations, and encourage the agency to adopt Option F to discontinue grazing and allow members of the public to enjoy this beautiful park and to be enriched with opportunities to visit and appreciate this special place.

#7060

Name: Petersen, Mike

Correspondence: The Lands Council has monitored the impacts of cattle grazing on public lands for over 30 years. We believe that the original intent of removing livestock from the Point Reyes Park needs to finally be followed. Therefore we support Alternative F - ending the livestock grazing

Thank you for the opportunity to comment,

Mike Petersen Executive Director

#7061

Name: potts, randall

Correspondence: I have spent countless hours hiking, birding and writing in Point Reyes National Seashore and I've seen first hand how cattle grazing has been repeatedly allowed to continue to the detriment of the entire ecosystem. But most importantly, the iconic Tule Elk are now being targeted in favor of increased cattle grazing. This is unacceptable and flies in the face of the mandate of the National Park Service.

Point Reyes National Seashore is supposed to be managed under the Point Reyes Act for "maximum protection, restoration, and preservation of the natural environment." There's no mandate for prioritizing commercial agricultural leases on these public lands. Natural values, native wildlife, public access and enjoyment should take priority over commercial activities at Point Reyes.

Tule elk are an important part of the landscape at Point Reyes. Their recovery is a result of successful native ecosystem restoration, which is a key element of the Park Service's mission. It's taken a lot of time, money and effort to restore tule elk to Point Reyes, the only national park where they live. Tule elk should be allowed to roam free and forage in the park - not shot, removed, fenced or treated as problem animals.

The mandate of National Parks is to preserve ecosystems so that the American people can experience how Nature works. I urge you to follow this mandate and preserve this invaluable landscape and the remarkable plants and animals that call it home.

#7062

Name: Davis, Stuart

Correspondence: The NPS should adopt Alternative F to preserve the Tule Elk in its entirety. Animal diversity underscores the longevity and vibrancy of every ecosystem. While increased access to farming and grazing lands benefits food production and local commerce, these benefits are outweighed by the costs connected with species extinction, including water pollution, soil erosion, disease spreading, and increased invasive species. Alternative F presents an opportunity to not only maintain the natural splendor of Point Reyes National Seashore, but materially improve the well-being of local residents.

#7063

Name: Bash, Carol

Correspondence: Please adopt Alternative F, which would discontinue farming and ranching opportunities in the park and expand visitor opportunities. The preservation of native wild species must take precedence over farming and ranching activities. Remind it that grazing negatively affects ecosystems, causing water pollution and soil erosion, spreading invasive species and disease, and harming endangered species.

#7064

Name: Manley , Wanda

Correspondence: Manage this area for wildlife. There is no need to kill elk for the benefit of livestock and welfare ranching. We need natural landscapes to heal our environment. No more concessions to livestock.

#7065

Name: BERTAINA, ALAN and BEVERLY

Correspondence: We adamantly oppose allowing the cattle ranches to remain on Point Reyes National Park land. We understand that the ranchers were paid millions of dollars and given 25 years or the lifetime of the owner to vacate the land which they had sold. They should be required to comply with the contracts they signed. The Park should not be commercially exploited. The Park land should be returned to its natural state, encouraging native plants and animals to flourish. We live nearby and often enjoy the Park and wish to see it given back to nature.

#7066

Name: Dillon, Christine

Correspondence:

I'm writing to support the public access and bicycling improvements outlined under Alternatives B, C, D, E, and F. I strongly support proposals that would lead to the planning and implementation of bicycling routes on trails, ranch roads, and pathways throughout the planning area, including but not limited to: 1) a connection between Devil's Gulch and Platform Bridge Road using existing ranch roads, 2) a connection between Bolinas Ridge Trail at Olema Hill and Point Reyes Station to serve as an interim connection for the Cross Marin Trail, 3) a connection between Bolinas Ridge Trail and Five Brooks Stables using existing ranch roads 4) a connection between Drakes Estero and Abbotts Lagoon Trail using existing ranch roads, 5) a connection between Marshall Beach Trailhead and Pierce Point Road using existing ranch roads, and 6) an Estero Trail loop using existing ranch roads. I encourage NPS to collaborate with ranchers and other stakeholders to educate the public and address concerns related to public access on working ranch lands.

The improvements outlined above would enable and encourage me to visit the Seashore more regularly-and by bike, rather than car. I would feel much safer riding in the Seashore and surrounding areas on trails, pathways, and ranch roads, rather than on roads shared with fast-moving vehicular traffic. Bicycling opportunities are currently very limited and fragmented, so any improvements in connectivity and the creation of new loop options would enable me to enjoy more of the Seashore and surrounding areas by bike.

#7067

Name: Oppenheim, Diana

Correspondence: Dear Point Reyes National Seashore Superintendent Cecily Muldoon

I have been a long-time volunteer within Point Reyes National Seashore. I have spent years working in the coastal dunes, restoring sensitive habitat and protecting 4 endangered species and several other rare and threatened species. The wildlife in Point Reyes is some of the most diverse in the state and spending time enjoying the coastline, the trees, the plants, the birds, butterflies, the Tule Elk and other wildlife has been such a gift.

I started to volunteer in the dunes because I understand the importance of protecting the very small amount of wild spaces we have left. We are in a state of climate emergency. In the past 50 years, humans have wiped out an astonishing 60% of wildlife on the planet. We need to be doing everything we can to uphold and protect our biodiversity, as diverse ecosystems are healthiest and will adapt more easily to the climate emergency. So my work in the coastal dunes, and restoring a previously-destroyed ecosystem has been something I considered to be one of the most important things in my life. I saw it not just as a pleasant time in nature, I saw it as vital to the survival of our planet.

The reason why the coastal dunes have been destroyed was due to cattle ranching. Ranchers have planted invasive grasses to prevent sand from encroaching on their pasture lands. The European Beach Grass took over the ecosystem and created a monoculture where almost no native plants and animals could survive. It has taken an enormous amount of resources to restore a small segment of the dunes. My takeaway is: If you can prevent a mistake first, you must prevent it because fixing mistakes takes a lot of time.

When I learned the park is planning to uphold and expand the ranching in the seashore, especially when there is a chance to phase out such a destructive industry, I had to learn more about why that could be. The more I learned, the more I became upset. I believe Point Reyes National Seashore is consciously mismanaging their land, and allowing ranches to continuously run their business in a way that causes harm to ecosystems.

After I became vocal on my stance that the park should save Tule Elk and wildlife within the park, I was contacted by the park staff and given an ultimatum. I was asked to censor myself and asked to go back and delete all



references of my volunteer work in the park from my personal social media pages. NPS said that they have to appear neutral in the planning process, and that members of the public might mistake my personal opinion for a park position. I refused to censor myself, and the park has banned me from volunteering.

I have helped to collect hundreds of comments from other citizens who also want the park to choose wildlife protection and restoration and to phase out ranching. Melanie Gunn and the NPS has refused to accept those comments stating a policy of not accepting bulk comments.

Meanwhile, ranchers have been allowed to give presentations of the benefits of ranching on other volunteer events. Meanwhile ranchers are allowed to continue operations during the planning process. Meanwhile, the parks preferred alternative includes killing Tule Elk and upholding and expanding ranching. This is not a neutral position. This is a clear preference to uphold, protect and choose industry over the voice of the public and over the protection of rare, threatened and endangered species, and over the protection and restoration of our native ecosystems.

Here are some of my comments surrounding the parks General Land Management Plan.

1. Tule Elk should not be shot or lethally removed. In fact, they should be allowed to expand and create new herds. Tule Elk have gone through genetic bottle necking as their original population of 500,000 was reduced to just 20 individuals. To support the long-term survival of the species, genetic diversity of the herds should be considered. The plans management of the Tule Elk seem to be coming from their affect on ranching operations. I would like to see a management plan conducted with the long-term survival of the Tule Elk and their genetic diversity included in the alternatives. I would like to see more in depth analysis of the ecological effects of Tule Elk grazing on the land. Tule Elk, being native to the area, have been known to help restore grasslands and coastal scrubland. Other than potentially competing with cattle grazers, what negative effects have the Tule Elk had on the land? Other than potentially competing with cattle grazers and dairy industry, what negative effects have Tule Elk had on the land? I do not believe the GLMP has thoroughly addressed these issues. (

2. GLMP did not consider the effects of climate change. According to the United Nations and the International Panel on Climate Change, we have less than 12 years to mitigate the worst effects of climate change. They also suggest that land use has to change and we need to reduce the amount of land used for cattle grazing. The GLMP did not consider the effects of climate change when looking at land and water quality assessments. Cattle and Dairy operations in the park compromise over 60% of the parks greenhouse gas emissions. Over 160,000 gallons of water are used for cattle operations. With wildfires raging in the state of California more and more every year, it is irresponsible for the national park to use water to feed cows. To offer ranchers 20-year leases is irresponsible as we have less than 12 years to turn things around to minimize harm caused by climate change. (

3. I oppose the diversification of ranches. The ranchers have already been bought out by the federal government. The enabling legislation of Point Reyes is to protect wildlife. It says nothing about letting ranchers operation their businesses. The original permits of 25 years have expired and there is no need to continue to allow the ranches to operate at all. Ranchers were paid millions of dollars for their land already. Ranchers pay no property taxes. Ranches are subsidized by the federal government. The dairy industry is heavily subsidized by the federal government. Diversification would put more stress on the National Park to invest more resources to manage more things. The GLMP does not adequately explain how the park intends to manage and enforce best practices around these new, allowed practices such as sheep, goats, row crops, chickens and airbnbs. The park has limited resources both people power and financial budgets. The park has already failed to properly manage the dairy and cattle operations as is. There is no way the park will be able properly manage this diversification. (

4. Running ranching and cattle operations is not historic. The park is under no legal requirement to allow business operations to continue on National Park Land. The cultural and historic resource is considered buildings- NOT business. Pierce Point Ranch is a historic building site where the actual day to day operations have ceased. The public can still view this ranch in a historical context and learn the history of dairy industry by reading info tables. There are over 6000 cattle on the seashore. Those cattle are causing permanent scars in the landscape, creating

over 133 million pounds of manure annually that have to be dealt with. The enormous amounts of manure produced have led to water contamination and negatively impacts streams and rivers where rare, threatened and endangered species live. The business operations of these ranches and all their cattle are not needed to maintain the title of historic and cultural. (

5. Silage mowing is a terrible practice and needs to be stopped. Every year, ranchers plant invasive grasses to grow and then be mowed down to feed their cattle. Native bird and mammal species wind up in these fields of grasses just to be mowed down. A study by Point Blue showed that native bird species richness declined after silage mowing. The only exception to this was an increase in the Raven population. Ravens are the number one threat to the endangered snowy plover. This is a direct link between the park allowing industry to thrive at the direct expense of an endangered bird. Not only is this devastating for wildlife, but the park should not allow ANY non native grass to be planted within the seashore. Any grass or plants that are planted should be native, and should be for the purpose of restoration. The grass planted by ranchers are invasive and for the purpose of their business. (

6. I don't believe the GLMP has adequately explained how they will pay for and execute mitigation efforts of the ranching operations. (

7. I would like there to be expanded analysis on the effects to wildlife and restoration efforts after the phase out of ranching. What would the actual benefits be to water systems, wildlife, native species, native grasses, and even the public pleasure of viewing more wildlife in the park as they will be granted access to over 28,000 acres after the ranches are phased out. (

8. The GLMP does not showcase the multiple breaches in lease agreements between ranchers and the park. Through FOIA requests, we have seen the park cater to ranchers, pay for damage repairs to ranch property without evidence, dispose of cattle carcasses improperly and more. Ranchers have surpassed the number of cattle allowed by their permits. Please make this information part of the planning process, and explain how you will mitigate.

I support Alternative F. This is the only alternative that will actually protect our natural resources. A National Park supposedly has the highest protections for wildlife. I hope that Point Reyes can see past the status quo of the cattle and dairy industry and return the land to what it was originally supposed to be, and was originally bought and paid for to become: a wildlife refuge.

With sincerity and hope, Diana Oppenheim

#7068

Name: Seda, Claire

Correspondence: I appreciate the time taken on the presented plans. As a local resident who visits the Seashore very frequently, I am distressed by the present management plans, as even a casual observer can see that the current approach to management of the ranches goes against the park's stated purpose of resource protection. Some comments on the DEIS:

-The EIS should remove all types of diversification from DEIS consideration and programmatic planning as the DEIS does not evaluate cumulative, direct or indirect impacts, connected actions, or reasonably foreseeable outcomes of diversification. How can the Seashore possibly sufficiently analyze the impact of diversified use of ranch lands?

-The historic ranches have an opportunity and obligation to protect resources on parklands. The EIS should revise the development of Ranchland Zoning so that it prioritizes holistic planning areas and resource protection buffers that are connected to sensitive resources, watersheds, and wilderness areas that are within and outside of

the Planning Area. The DEIS does not sufficiently support or promote holistic practices that should be the standard for the ranches.

-The EIS needs to evaluate the impact of climate change.

-Water quality testing should be required, as a basic measure to assure ranches are acting as good neighbors and stewards to our waterways.

-To keep within the delegated authority and be consistent with the park's purpose, the Seashore must focus continuation of ranching on cultural and historical significance of multi-generational beef and dairy ranching and should not open ranching operations through competitive bidding process to the general public.

-Tule elk are a natural resource that need to be preserved. Resource protection is the highest value for the Seashore as intended by Congress in requiring the Department of the Interior to administer its Point Reyes lands "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 USC Sec. 459c (6)(a). The culling of tule elk goes directly against the intention of Congress in establishing the Seashore.

#7069

Name: Poore, Elizabeth

Correspondence: After reading the draft proposals for point Reyes, I am flabbergasted that such proposals are even being considered in this day and age. National parks really are America's best idea nthey draw billions of dollars from overseas in tourist money, and are a source of sanity for every American citizen as quiet, clean air, and healthy woodlands become more and more rare. The planet is facing unprecedented hazards from human overpopulation, habitat destruction world wide, and climate change... Every wild species in the world is declining, we have replaced what, 75% of the planets biomass with a few domestic species. There are over 98 million cows registered in the us alone..... And STILL that's not enough? How can we even be remotely ignorant enough as to consider keeping cattle and private profiteers on our declining public lands? If we protect point Reyes as a natural and healthy seashore, future generations will benefit for centuries. If we let it become yet Another welfare ranch, what to future generations get? More cow crap? The last tule elk in a zoo, if they are lucky? We don't need more ranches. We certainly don't need more dairies. We are grossly overproducing dairy as it is. And we definitely do not need to be subsidizing private profit at the expense of our national treasures. It's like selling off priceless family heirlooms so one person can go on a binge. It's despicable, selfish, short-sighted, greedy, and downright dangerous. Native species and their habitats that we all depend on too have got to be the very first priority.

#7070

Name: Edwards, Kate

Correspondence: I support Alternative F: Ranching operations to be discontinued and visitor opportunities to be expanded in regards to the proposed Pt. Reyes GMP Amendment EIS. I am strongly against the NPS preferred alternative.

In the 1960s and 70s California taxpayers bought out all the ranchers with millions of dollars, and at the time, the ranchers agreed to relocate out of the park. The NPS needs to honor this agreement.

The negative environmental impacts of ranching on the Pt Reyes National Seashore are horrific and need to end. Cattle grazing causes erosion and soil loss, water pollution, destruction of habitat, and spread of invasive plants. Cattle ranching also uses extreme amounts of water. Congress created this park to conserve it with maximum protection, restoration, and preservation of the natural environment.

I have brought many many people to visit the beautiful Pt Reyes seashore and see the elk. People love to see the native Tule in the only national park where they live. Nobody says to me, Oh, look at those cows. There are plenty of cows in California in other locations. I know myself and the majority of visitors would stop visiting this area and patronizing the nearby businesses if we knew the Tule Elk were being killed to promote ranching.

#7071

Name: SHEETS, RYAN

Correspondence: I am a 20 year resident of the Bay Area. I am a mountain biker. I have bike-camped or backpacked/camped at each of the four backcountry sites in Pt. Reyes many times. I take my kids along with me. I've been camping, hiking, and sometimes biking there for 20 years.

My view is MOST if not ALL of the trails should be open to mountain bikes. Pt. Reyes is very big. Only some parts are highly impacted by hikers or other visitors and those are the beaches and certain hikes only. I RARELY see other bikers on the fireroad climb/descent from Five Brooks to Wildcat. Bikes should be able to ride the single track trails that branch off of that route. Why shouldn't they be allowed? Pt. Reyes will not become an overused trail system, I predict, due to so many other places available to ride.

If horse can be on the trails, then bikes should be allowed too. Horses damage trails far more than bikes. I believe this to be the case on ANY trail horses are allowed on but bikes are not.

If there is a concern about horse/bike trail conflict, the do what they do with the Tahoe Rim Trail, perhaps: allow bikes on even or odd days only.

Why can't riders ride from Palomarin on Ridge or Coast Trail? Those trails are wide, an appropriate grade, and not heavily used by hikers.

Move yourself into the future: 2019 and beyond. Bikes are here to stay. Bikes should be allowed in Pt. Reyes. Bike groups can and would help you build and sustain the trails. We ALL, bikers included, should share the trails. Thanks,

#7072

Name: Robles, Lisa

Correspondence: I oppose the National Park Service's plan to kill native tule elk and expand commercial agriculture in Point Reyes National Seashore and Golden Gate National Recreation Area. I urge the National Park Service to instead restore the lands for wild animal habitat.

I support Alternative F as being the most environmentally friendly alternative as it includes phasing out ranching as was the original intention and it protects wildlife over livestock. Furthermore, Alt. F manages the seashore for the natural value it was created to preserve- land, water, and livestock. It would restore the pastoral zone for wildlife habitat, scientific research and education as well as repurpose the historic ranch buildings for research and education.

Alt F is a financially sound plan because far more revue comes from tourism than ranching. And speaking from personal experience, I have only been to Point Reyes once BECAUSE of the ranches and veal crates. I did not know those operations were going on out there and it broke my heart. If I had known what I was going to pass such sights to get to that beautiful shoreline, I would have stayed home. Tourists do not want to see those ranches and poor babies in crates.

We should prioritize the preservation of our public lands and wildlife, not the economic interests of private ranchers. Preserving the park is better for the environment given the pollution and droughts caused by the ranches - commercial cattle ranches have serious negative environmental impacts on the park: polluting

waterways, causing soil erosion, and harming the many endangered and threatened animals who live on Point Reyes.

Thank you.

#7073

Name: N/A, N/A

Correspondence: What would John Muir do? Wake up NPS. Make the park, a park. That was the PORE National Seashore's vision 50 years ago and should be the goal of the management plan going forward. You are clearly moving away from your guiding vision and prime mission. In light of the climate crisis, bird population collapse, and habitat mismanagement your favored plan is arguably criminal and certainly immoral. Shame on you and the blood on your boot heels.

#7074

Name: Donovan, Jen

Correspondence: If the rumors are true that the NPS plans to kill off the native Elk to make room for more agricultural farming then clearly the NPS is no longer protecting our natural resources. That idea goes against the very premise of conservation, Preservation and Recreation for the public to visit the shrinking number of places one can go to enjoy the natural outdoors.

Does this plan fall within the mission statement of what the NPS stands for, our has that changed to satisfy cooperate greed? It would be a shame to see the very people put in charge to protect this land, steal it from our future generations to be able to enjoy.

#7075

Name: Ward, Kae

Correspondence: This is totally not acceptable. Please do not allow this area to be used for livestock or 'farming'. It is truly a unique area and should be preserved as a national or state park. Please reconsider.

#7076

Name: Dielman, Michael

Correspondence: Save the animals

#7077

Name: Vandivort, Nicole

Correspondence: Keep industrial agriculture and ranching out of public lands!

#7078

Name: N/A, N/A

Correspondence: I am writing to urge the NPS to discontinue the grazing of beef and dairy cattle at Point Reyes National Seashore. This land should be used by native wildlife and for the undisturbed, natural use by the general public, not for commercial purposes. Livestock grazing does not belong in a national park or seashore.

I strongly oppose Option B and any other proposal that would be fatal to Tule Elk or other wildlife to the benefit of ranching operations, and encourage the agency to adopt Option F to discontinue grazing and allow members of the public to enjoy this beautiful park and to be enriched with opportunities to visit and appreciate this special place.

#7079

Name: Wenninger, Nancy

Correspondence: I am writing on behalf of the more than 400 members of the Mt. Diablo Audubon Society to urge you to select Alternative F for the future of Pt. Reyes National Seashore. This park is a critical stopover for a number of rare and migrant species of birds and is the premiere birding area for Northern California. For many years, Pt. Reyes has provided excellent opportunities for wildlife observation and public education. During a recent visit there, I observed over-grazing of some areas of the ranches which will cause problems with erosion and water quality, as well as loss of habitat for native species. Public access is being discouraged and, in some cases, eliminated. We need a new vision for the Seashore: No ranching. •Phase out the ranches. In the interim, no expansion to additional crops. •Disallow all commercial livestock in the park. •Prioritize wildlife over domestic cattle. •Biodiversity should not be sacrificed to private ranching. •Restore wildlife habitat and native plant communities. •Repurpose historic ranch buildings for scientific research, interpretation and public education. The emphasis needs to be on the "national seashore" as originally intended.

#7080

Name: Peranteau, Suzanne

Correspondence: As an American citizen I strongly object to killing native elk to continue to allow for ranching and domestic livestock pasturing purposes. The tule elk belonged long before the cattle. It's the ranchers duty to make sure they are accommodating to wild species, especially since they have a beneficial relationship with the native environment. No elk blood for cattle.

#7081

Name: Holtzman, Julie

Correspondence: Point Reyes National Seashore is supposed to be managed under the Point Reyes Act for "maximum protection, restoration, and preservation of the natural environment." There's no mandate for prioritizing commercial agricultural leases on these public lands.

- Natural values, native wildlife, public access and enjoyment MUST take priority over commercial activities at Point Reyes.
- Tule elk are an important part of the landscape at Point Reyes. Their recovery is a result of successful native ecosystem restoration, which is a key element of the Park Service's mission. It's taken a lot of time, money and effort to restore tule elk to Point Reyes, the ONLY national park where they live. Tule elk must be allowed to roam free and forage in the park - not shot, removed, fenced or treated as problem animals.
- Right now the Point Reyes ranches enjoy not only subsidized grazing fees and housing, but also taxpayer-funded infrastructure and road improvements, and publicly funded projects. But commercial activities at Point Reyes should be required to accommodate native wildlife - not the other way around. Citizens such as myself resent such concessions at the public's expense.
- The Park Service shouldn't allow any new agricultural activities at Point Reyes. Planting artichokes or other row crops will attract birds. Also, introducing sheep, goats, pigs or chickens will attract native predators such as coyotes, bobcats and foxes....and after all, what do you expect when humans foolishly introduce prey species into THEIR territory? Expanded ranching would only create new wildlife conflicts.
- Cattle ranching should only be allowed if it's consistent with preserving the natural environment. And agricultural activities such as mowing shouldn't be allowed in park areas where they harm endangered species or wildlife habitat, impair water quality, cause excessive erosion or spread invasive plants/diseases Native grasses in particular generally decline under such circumstances.

- Cattle are the seashore's primary source of greenhouse gases. So the Park Service's preferred alternative is inconsistent with its own "Climate Friendly Parks" plan.

Finally, just a reminder - people visit our national parks and monuments - a multi-billion dollar tourism industry - to marvel at America's purple mountain majesties and other breathtaking wonders. They do NOT want to see cattle and other domestic animals!!

#7082

Name: Lipmanson, Don

Correspondence: My family and I are frequent visitors (roughly 5-6 times per year) to Point Reyes National Seashore, where we go for day hikes and to watch for wildlife. Obviously this is a most extraordinary and unique place for us to see coyotes, bobcats, foxes, plus the seal and sea lion haul-out rocks along the southern edge of the peninsula.

I am appalled by NPS's proposal to devote 1/3 of the Park to cattle grazing and to kill native Tule elk for the supposed benefits of a couple dozen ranching families. Tule elk are indigenous to this location, whereas cattle are there solely "thanks" to European settlers and the federal government's historic subsidizing of ranchers. The federal government's support of cattle ranching is all the more toxic to the planet, now that animal agriculture has been identified a primary source of greenhouse gas emissions, especially methane.

Nothing in the Constitution or the Bill of Rights requires or allows NPS to violate NEPA and Public Trust Doctrine by allowing a small percentage of our country's population to effectively capture 1/3rd of a national park. By the logic at work here, why not dedicate Yellowstone's Lamar Valley to cattle as well?

It appears that NPS is succumbing to political pressure from a most corrupt federal administration, ready to do most anything to promote the financial interests of its backers regardless of what science shows to be the ecologically damaging effects of that activity. Specifically, it is appalling to see NPS acting just like USDA-Wildlife Services (WS) in its readiness to kill native wildlife on behalf of farmers and ranchers. A very recent DEIR addressing WS activities in nearby Mendocino County reports that Marin County ranchers are silently killing coyotes and bobcats, in defiance of that county's non-lethal program aimed at minimizing human vs. wildlife conflicts. What NPS is proposing here - killing a unique subspecies of elk - mirrors the current Administration's utter indifference to the natural world, rather than adherence to its historic mission of providing the public with places where we can experience intact natural ecosystems.

Leases always come with a limited "shelf life"; 60 years of cattle grazing is enough. The current ranches within the Seashore's boundaries offer acre upon acre of muck, a decided stench from overly concentrated manure and acres of revoltingly small plastic crates that appear to house young calves being tightly confined and left in relative darkness only to be killed for veal. Promotion of animal cruelty, pointless killing of elk and environmental degradation through intense cattle ranching are not what national parks were created for or what they still are intended to offer.

Protection of wild lands and wildlife are components of your agency's mission. You are NOT an arm of USDA. Please reject this ill-conceived proposal to displace wildlife for the benefit of commercial agriculture.

Yours truly, Don Lipmanson Attorney at Law

#7083

Name: N/A, N/A

Correspondence: Can't you leave well enough alone? Leave the native animals where they belong. Why must humans ruin everything? The more out of balance you make our planet, the more we all will suffer. We have devastating weather happenings almost every day now and it's not for no reason, it's from the humans having their

way with the environment. Catch a clue and stop being so greedy. Newsflash - there is more to life than profit. Wake up!

#7084

Name: Brokken, Petra

Correspondence: As a member of the California-based international animal protection nonprofit organization In Defense of Animals with over 250,000 supporters, I oppose the National Park Service plan to kill native Tule elk, grow commercial crops, and permit ranchers to add chickens, turkeys, sheep, pigs, and goats to their exploitative operations. For this reason, I support Alternative F.

As national park land, this property was specifically set aside to protect, restore, and preserve the natural environment including the wild animals who live there. The original intention was to phase out dairy and cattle ranching, not add more crops or animals to increase ranching profits.

The proposed plan does not address the damage from grazing, including water-quality degradation and soil erosion. Also, adding new crops will create more conflicts with native wild animals.

Please abandon this inhumane and destructive plan by selecting Alternative F. I urge you to restore the Seashore's Pastoral Zone for wild animal habitat and repurpose historic ranch buildings for scientific research, interpretation, and public education.

#7085

Name: Edgelow, Gillian

Correspondence: Pt. Reyes must prioritize wildlife over private industry in the park, particularly the tule elk. I oppose diversification. There are numerous studies that show it is harmful. The ranches need to leave Pt. Reyes. I oppose strongly any future leases for the ranches, as they pollute the land and water, and are detrimental to native species of all kinds.

#7086

Name: Marckwald, Kirk

Correspondence: Dear Sir/Madam - -

Having read large parts of the General Management Plan EIS, I believe that Preferred Alternative B best balances the original intent of the creation of the Point Reyes National Seashore. I support helping ranchers expand their economic activity to ensure future vitality. I support the concept of increased oversight and enforcement of agricultural activities. I support new formal and informal trails to allow hikers to enjoy the full breadth and length of the park.

Alternative B provides for and encourages all of these attributes which is why I think it is the best one for the Park to adopt.

Kirk Marckwald

#7087

Name: Turner, Johnathon

Correspondence: Please, no more ranching on Pt Reyes National Seashore.



We need a new vision for the Seashore: No ranching. (Alternative D)

Phase out the ranches. Disallow all commercial livestock in the park. Prioritize wildlife over domestic cattle. Biodiversity should not be sacrificed to private ranching, Restore wildlife habitat and native plant communities Repurpose historic ranch buildings for scientific research, interpretation and public education.

Thank you

Johnathon Turner

#7088

Name: N/A, N/A

Correspondence: The Point Reyes National Seashore is no place for cattle or livestock leases. I urge the National Park Service to discontinue grazing permits and allow this natural habitat to be enjoyed by the public.

#7089

Name: Barthelson, Roger

Correspondence: I am writing with regard to the proposed culling of Tule elk from Point Reyes National Seashore Park. This proposal is ridiculous. I have been to this place many times and the preservation of the land and the ecosystem is much more important than the increased income of any Western ranching operation. I support ranchers and see them frequently here in Tucson. I buy my beef exclusively directly from them. Raising cattle in the West is difficult, but that does not justify ever the environmental damage that they may cause or the killing of wildlife of any kind on federal lands. If it's so hard to raise cattle in the West, then don't. There are plenty of places in the US where green grass grows plentifully. Please do not allow the culling of Tule elk as proposed.

#7090

Name: Jones, Ken

Correspondence: Thank you for the EIS which I have read through. It is clear that the NPS choice of Plan B is favoring ranching and dairy interests - and the profits they accrue - over the interests of the vast majority of people and the the current needs of the planet to have its nature restored. Restoring this area was a goal and the current situation was supposed to be a transition to get us back to that goal.

We need to continue in that direction. I am strongly supportive of Plan F and least supportive of Plan B. It is remarkable that the EIS points to all the benefits of Plan F, including removing the ranching-related pollution to our atmosphere. Perhaps the distance these cattle are from where they would need to go to be butchered for eating was not even considered. Or even how much farther the dairy products are transported before they are used by coming so far from population and from other ranching and dairy concerns.

It is sad to me that NPS has become an advocate for large agricultural interests as that is who ultimately is benefiting from Plan B. These are not small family farms even if they look like they might be. We need to stop promoting meat products and dairy as they are hugely responsible for climate breakdown and Plan B would accelerate that. This not only takes us farther away from our possibility of meeting our Paris Accord commitments but California's climate goals, even if the same amount of dairy and cattle raising is done elsewhere in the state.

#7091

Name: Haliday, Emily

Correspondence: Dear Sir or Madame:

Please do not allow the extension of leasing of public lands to cattle grazing, or other commercial agricultural pursuit. I also have heard that you are considering expanding the type of commercial farming activity, i.e., diversification of farming species, to occur on public lands at Point Reyes seashore. Instead, I urge you to adopt Alternative F of the proposals, phasing out ranching, and managing the land, water and wildlife.

The public has already paid for this land to be kept wild. Currently, the Park Service is permitting this public land, and the native species which originally inhabited it, to be despoiled and destroyed. This is a travesty, a disgrace, and is certainly outside the bounds of the legislation which is supposed to protect the land from exploitation. The Park Service is clearly in breach of the fiduciary duty it owes to the people of the US who paid for this wild land to be set apart from exploitation. And of course, it is an utter betrayal to allow the native species to suffer and die, or to be displaced, due to what may very well be illegal exploitation of this land by commercial agribusiness.

There is no saving grace to be had in falsely identifying these commercial "farms", which are despoiling both land and species, as historical and/or bucolic! You simply must stop this activity, and allow the land to be returned to the public as was intended and authorized under the law. Please adhere to your responsibility on this matter, and reverse current plans to expand these destructive practices! Do what you are charged to do under law!

Very truly yours, Emily Haliday

#7092

Name: P. , Julie

Correspondence: Allowing the killing the the Tule Elks in Point Reyes will be an unprecedented and unjustified massacre of wildlife in a \*protected\* area in favour of commercial enterprises.

The park must instead enhance Tule Elk habitat and protect the elk.

The park must stop granting the continual renewal of 20-year permits and leases to cattle and dairy ranchers. Ranchers have already overstayed their original permit limits. Such renewals of long-term leases is setting a negative precedent in favor of private, commercial industry and jeopardize the future of all our parks and protected areas as well as the health of the ecosystem and its biodiversity.

No diversification of ranch operations should be allowed: any diversification (such as chicken coops, pigs, sheep, row crops, etc) will only serve to attract more predators like coyotes, foxes, bobcats that will be in conflict with ranch operations and will later have to be "managed" as well. A growing predator population will further endanger the biodiversity of the park.

The park, a protected area, established with the purpose of protecting the ecosystem and the animals living in it, should revoke permits for all cattle and dairy operations and restore the leased land to its original, pre-industry state.

The mission of the park should be to prioritize wildlife preservation and protection.

#7093

Name: Fertig, Laura

Correspondence: As a botanist interested in conservation of natural areas and ecosystem processes, I am concerned that the proposed management plan for Point Reyes National Seashore. By promoting destructive livestock grazing over preservation of native plants and animals, the plan violates the 1916 Organic Act that calls for NPS to manage for non-impairment of natural resources. It also goes against the National Seashore's own original direction to protect and restore objects and values. As someone who works on livestock grazing issues on

public land and a former employee of the National Park Service, I am appalled that a unit of the NPS is proposing to actually kill native Tule elk to remove competition for forage with non-native livestock. This represents a reversal of the original intent of the legislation, which was to phase out cattle grazing because it was contrary to NPS policy and resource protection. Ranchers have already been adequately compensated. They must not be allowed to continue to degrade our natural heritage. Preventing Tule elk from accessing water and forage improperly gives scarce natural resources on public land to private industry and, even worse, rises to the level of animal abuse.

Grazing can have devastating effects on the soil, hydrology, and vegetation processes on ecosystems. Indeed, photos from Pt. Reyes itself shows damage to all three of these ecosystem processes from livestock grazing. There is a reason most NPS units don't allow grazing. The National Park Service has an obligation to prevent this degradation. It must end ranching on our public lands in Pt. Reyes National Seashore, one of the few open spaces in the urbanized California coast.

I ask NPS to return to their original mandate and the spirit of the enabling legislation and manage to protect and restore native elk rather than propping up a failing industry that has devastating impacts on this NPS unit. Livestock grazing occurs on millions of acres in the United States. Surely we can spare a few of those for the maintenance of wild species?

#7094

Name: Abbott, Robert

Correspondence: I believe that it is time for the Ranchers and Dairy farmers to move off the parks land. They have been paid ample funds to purchase new land and move their Dairy cows and cattle operations elsewhere. I feel it is time to let the native animal community to be allowed back onto the land that they once inhabited. Fences should come down on the park and the deer and elk should be allowed to reestablish the park lands.

Thank you for allowing me to give my opinion on these matters.

Respectfully

Robert C. Abbott Jr.

#7095

Name: Booker, Susan

Correspondence: To Whom It May Concern:

As owners of the Certified Public Accountant firm for one of the ranchers in the planning area, we fully understand the economics of this small family farm. Any further restrictions on its operations could cause the farm to go out of business for financial reasons. Also, given the state of agriculture, especially in Marin County, being able to diversify will be critical to the survival of this family farm. The practice of diversification has been encouraged and applauded throughout the county. Our client will not be able to compete with their fellow county farmers if they are not allowed to diversify in a meaningful way. The DEIS failed to appropriately consider the economic effects of the restrictions in the zoning framework and diversification and must be revised for the final EIS.

Thank you for the opportunity to post our comment.

Philip N. Booker, CPA and Susan Booker Booker Accountancy Company

#7096

Name: Blair, Richard

Correspondence: Has the Park Service lost it's mind?

I support Alternative Plan F

As the former Park Photographer of Yosemite National Park I know what National Parks are all about- it isn't ranching. It is preserving and protecting nature. Point Reyes is a National Seashore. That is its reason for being.

I have written six books on Point Reyes and my work has contributed over \$100,000 to the park.

Farming here is a dirty, polluting business. It is clear that ranching is harmful to the park's natural ecology. Anyone can see that, unless they are making money with Ag.

You are just protecting your jobs (in the Trump administration) by having all these alternatives for people to comment on. One alternative is killing the tule elk, which are a threatened species. Yesterday I watched people having a magic moment in the park observing the elk.

Does NPS have morals? You can enforce wilderness and other park laws to protect land and wildlife but by allowing ranching you negate all your conservation efforts.

I tried to hike the trail to Kehoe yesterday but the smell on manure was so strong that I had to turn back. Perhaps silage was just applied. You should hike it soon and smell the air.

The American people paid for a park but got this experience?

The way the ranchers treat there farmworkers is also revolting. I know a farmworker (twenty five years of employment) whose boss won't let the family have a washer and dryer - too much electricity cost. These are the farmers that you are leasing to?

Shame on the National Park Service!

#7097

Name: Christianson, Steve

Correspondence: As a homo sapien, I am opposed to the preferred status that the US Federal Government continually gives to Bos taurus. I have visited the subject land in question on several occasions and am appalled that cattle are being considered priority over wildlife; this is shameful, disgraceful and another form of welfare for cattle ranchers. Socialism at its finest for the cattle industry, again, extremely shameful.

I oppose the National Park Service plan to kill native Tule elk, grow commercial crops, and permit ranchers to add chickens, turkeys, sheep, pigs, and goats to their exploitative operations. For this reason, I support Alternative F.

As national park land, this property was specifically set aside to protect, restore, and preserve the natural environment including the wild animals who live there. The original intention was to phase out dairy and cattle ranching, not add more crops or animals to increase ranching profits.

The proposed plan does not address the damage from grazing, including water-quality degradation and soil erosion. Also, adding new crops will create more conflicts with native wild animals.

Please abandon this inhumane and destructive plan by selecting Alternative F. I urge you to restore the Seashore's Pastoral Zone for wild animal habitat and repurpose historic ranch buildings for scientific research, interpretation, and public education.

#7098

Name: Gray, Richard

Correspondence: The National Park Service should honor the National Seashore's authorizing legislation by beginning the phase out of cattle ranching immediately. There was never an intention to continue cattle ranching when the park was founded. I insist on implementation of alternative F to end cattle ranching as soon as possible.

The beef and dairy industry and cattle ranching have been found to be a major driver of climate change and on that basis alone continuing ranching sends the wrong message to all park visitors. We need to have the nation and the world move to a plant-based diet for our own survival. Also, cows are not part of the natural environment on this site. Other native animals like deer and elk can provide the benefits of light grazing to grasslands without the destructive consequences of soil compaction in concentrated areas, water pollution from huge quantities of manure and habitat degradation for the rare bird species and native plants found at Pt. Reyes.

Moreover, 1/3 of the land area of the National Seashore is presently inaccessible to the public due to private use by ranchers. This is not Forest Service land where multiple uses are allowable. It is a National Park. The idea that Elk should be culled (killed) to make way for cows is abhorrent and inappropriate. There are millions of acres in California already in use for cattle ranching. This is one of the few areas on the West Coast where Elk live. Their habitat should be intentionally enlarged.

There was a time that I thought there was a benefit to supporting ranching in Marin by allowing continued use of NPS lands for cattle grazing. For the reasons stated above my thinking has evolved. Please implement alternative F and begin the process of restoring these lands to their natural state before ranching began.

#7099

Name: Eisenhart, Mary

Correspondence: Ranching is part of the way of life that was meant to be preserved by the creation of the Golden Gate National Recreation Area, despite its takeover by a park service apparently hell-bent on eliminating human recreation and building a nativist theme park.

I support solutions that preserve ranching, kill no elks, and recognize human activity, including ranching, agriculture, and recreation, as an integral part of why this land was saved from developers in the first place. It is a recreation area, not a wilderness park.

You have the intelligence and the resources to do this; please do it instead of throwing up your hands and caving to vocal nativist zealots.

Thank you.

#7100

Name: Smith, Brandi

Correspondence: we need to save our parks and animals

#7101

Name: Bishop, Greg

Correspondence: This is such a stupid idea. I thought the the National Park Service was meant to protect and conserve natural resources, not work in cahoots with those who want to destroy them. Throw this plan in the circular bin where it belongs.

#7102

Name: Patrick, Inna

Correspondence: This is madness like in mad cow disease. Do not shoot elk to allow more cows, sheep etc. non-native species. Trash the EIS.

#7103

Name: Goodwin, Kathleen

Correspondence: I support Alternative F and reject the NPS Alternative B as the "Preferred Plan".

Seeing degraded muddy fields in land which is supposed to be protected by the NPS is very distressing. There is no shortage of cows in the USA but there is a shortage of places particularly close to large urban areas where people can go to wind down and experience pristine environments. I tried to hike to Kehoe Beach recently and had to turn around because the smell of cow manure was so strong and persistent. That is no way to run a park.

Continuing to allow cattle in the Point Reyes National Seashore will perpetuate Johne's Disease, a.k.a. MAP (Mycobacterium avium paratuberculosis). Johne's Disease has been passed on to the Tule Elk. This disease has been linked to Crohns disease in humans. <https://www.ncbi.nlm.nih.gov/pmc/articles/PMC4894645/>.

The idea to even consider the culling of elk to protect land and cows for ranching is antithetical to the guiding principles of national parks which is to protect wildlife.

People come to Point Reyes to see elk, birds, wildlife, nature and beautiful vistas, not cows and farms, many of which are rundown and not well kept up. To allow roadside produce stands within a park, is not appropriate use. Many of ranchers in Point Reyes National Seashore do not have good track records for treating their workers well. The park service itself condemned a trailer in which a farmworker and his family had to live for about five years.

#7104

Name: Biandaescu , Deverra

Correspondence: I oppose President Trump's National Park Service shocking plan to kill native tule elk in California's Point Reyes National Seashore, the only national park where these rare animals live.

By killing up to 15 elk every year to appease private livestock owners who enjoy subsidized grazing of their cows on this precious public land is an abomination. This plan would enshrine private, for-profit cattle-growing as the park's main use - while doing little to rein in the damage from grazing, including water-quality degradation and soil erosion.

But that's not all. The plan would allow conversion of park grasslands to artichoke farms and row crops and let ranchers introduce sheep, goats, chickens and pigs - a recipe for even more conflict with native wildlife.

Do the right thing, for the people and by the people, stop this atrocity.

Deverra Biandaescu

#7105

Name: Quiñones, Hannah

Correspondence: I support plan of action F!

#7106

Name: Beurang, Pierre

Correspondence: Tule Elk are an incredibly important species, and their survival is completely in the hands of Point Reyes and the National Park Service. By allowing the culling of a threatened species, the ecosystem is going to be permanently damaged. While ranching is important, a species that is down to such low numbers is vastly more important. Option F would allow Point Reyes to be restored to what it once was, a vital habitat, thriving with biodiversity.

#7107

Name: N/A, N/A

Correspondence: I believe that we should go with option A because it protects the elk but also keeps the ranching and farming at a steady enough rate for economic benefits and that supports the needs of the general population.

#7108

Name: Lillevand, David

Correspondence: I believe that plan F is in the best interest of the reserve. Tule elk are a very endangered species, only found in Point Reyes. Therefore, I don't believe that shooting more elk and containing the population would be detrimental. Gradually phasing out ranches in the area and allowing the Tule elk to self populate is the best plan.

#7109

Name: MacDonald, Claire

Correspondence: I think we should go with option A, because if we have a current solution that is working then we don't need a new one that might cause more problems.

#7110

Name: Freund, Joylyn

Correspondence: I support Alternative F, as the Tule Elk don't deserve to be kicked out of their home or even to be hunted in their own home. The ranches moved into the Elk's home, not the opposite away around and the Elk have the right to live safely in their home, without being hunted.

#7111

Name: Dern, Serena

Correspondence: I support option F which means that Tule Elk will not be shot and ranching will stop. Tule Elk are an important native animal that have an impact on the local ecosystem. Without Tule Elk, the entire Point Reyes National Seashore ecosystem will be damaged.

#7112

Name: langer, anais

Correspondence: I support option F because Elk are more important than ranches/ ranch history.

#7113

Name: Greenholz, Lucas

Correspondence: As the Tule Elk in the area are a species entirely unique to this location, efforts should be made

to preserve the population present, not to cull them in order to allow for the betterment of ranchers. As option F allows for the preservation of the Tule Elk, I support this option in order to continue the viability of the species.

#7114

Name: Bergman, Aidan

Correspondence: Being a student at Drake High School, I have been taught to think critically about political issues, and using my thunkin' skills, it seems that the logical plan here is plan F. I support plan F, first of all, because there's no shooting of Tule Elk, a species that only lives in this one area of the world. Second, one of the main issues facing the environment is global warming, and one main contributing factor to global warming is ranching and all its products and byproducts. Removing ranchers and letting these natural habitats be the right thing to do, and we'd be doing a good thing in removing ranches, thereby helping the Point Reyes National Seashore ecosystem and doing our small part to reduce greenhouse gasses and waste in our world.

#7115

Name: N/A, N/A

Correspondence: I support option A because we have a system that works already!

#7116

Name: N/A, N/A

Correspondence: Please consider the fate and plight of eliminating the Tule Elk in Point Reyes. They are a wonder to behold.

In our ever more threatened world, animal welfare seems not to be a high priority, but their lives are paramount to them. It is a significant issue to me and many others, who do not think that any business, even long-established dairies have the moral right to cull animals that compete for their ability to make a profit.

Point Reyes is a nationally protected park, thanks in large part to your predecessors. Please don't let killing or removing wild animals in our protection be a part of your legacy.

Sincerely, Susan Stover

#7117

Name: N/A, N/A

Correspondence: I think it is best to not make a plan of action, as we need to find a humane way of controlling the population.

#7118

Name: Tabb, Lisa

Correspondence: I believe we should do nothing. Allowing the surrounding farmers to expand would impact the population of the Elk, but imposing that the surrounding ranchers cease their work would lead to a greater economic issue.

#7119

Name: Jackson, Madison

Correspondence: I am a citizen who has traveled to Pt. Reyes National Seashore several times to view the magnificent Tule Elk. It has been heartening to observe the increase in numbers of this iconic species and look forward to a time when the elk population has returned to the historic level and distribution described by



scientists. I honor the multiple-use needs of the park as long as the competing demands of the local ranching community do not impinge on the primary needs of the primary species (elk) being conserved for future generations.

The new information the EIS process must consider is the degree to which cattle numbers must be curtailed in our National Park to maximize the carrying capacity for elk. As a taxpayer, I come to see the native elk not the introduced cattle, which I can easily observe throughout California. One dairy farm or cattle ranch, which school children and the public can visit to learn about cows and local history, is sufficient to fulfill that multiple land use in the park.

Elk and cattle compete for grass. When estimating carrying capacity for these two species, I noted that rangeland scientists project two elk for one cow. There are currently about 5,000 cattle grazing in the park, outnumbering the 500 elk ten to one. With the commonly accepted ratio of two to one, elk numbers should be encouraged to rise substantially and cattle numbers should be held to one working ranch. The livestock industry has been and continues to be subsidized at taxpayers' expense. The public's interest in wildlife and native species is at an all-time National high. National public support for cattle ranching is at an historic low. Pt. Reyes National Seashore needs to honor the mission and the supporting scientific research for expansion of elk numbers throughout the park.

#7120

Name: Normandi, Iona

Correspondence: I support option F, renewing leases for ranching and not shooting the elk. I ask the park service to protect wildlife over industry profits.

#7121

Name: N/A, N/A

Correspondence: I am writing to urge the National Park Service to discontinue the grazing of beef and dairy cattle at Point Reyes National Seashore. This precious area has been damaged by livestock grazing which poses a threat to the environment and local wildlife and it should be protected and used to serve the public good, and not for the benefit of the livestock industry.

I strongly oppose Option B and any other proposal that would be fatal to Tule Elk or other wildlife to the benefit of ranching operations, and encourage the agency to adopt Option F to discontinue grazing and allow members of the public to enjoy this beautiful park and to be enriched with opportunities to visit and appreciate this special place.

#7122

Name: Steiner, Moritz

Correspondence: I'm writing to support the public access and bicycling improvements outlined under Alternatives B, C, D, E, and F. I strongly support proposals that would lead to the planning and implementation of bicycling routes on trails, ranch roads, and pathways throughout the planning area, including but not limited to: 1) a connection between Devil's Gulch and Platform Bridge Road using existing ranch roads, 2) a connection between Bolinas Ridge Trail at Olema Hill and Point Reyes Station to serve as an interim connection for the Cross Marin Trail, 3) a connection between Bolinas Ridge Trail and Five Brooks Stables using existing ranch roads 4) a connection between Drakes Estero and Abbotts Lagoon Trail using existing ranch roads, 5) a connection between Marshall Beach Trailhead and Pierce Point Road using existing ranch roads, and 6) an Estero Trail loop using existing ranch roads. I encourage NPS to collaborate with ranchers and other stakeholders to educate the public and address concerns related to public access on working ranch lands.

The improvements outlined above would enable and encourage me to visit the Seashore more regularly-and by bike, rather than car. I would feel much safer riding in the Seashore and surrounding areas on trails, pathways, and ranch roads, rather than on roads shared with fast-moving vehicular traffic. Bicycling opportunities are currently very limited and fragmented, so any improvements in connectivity and the creation of new loop options would enable me to enjoy more of the Seashore and surrounding areas by bike.

#7123

Name: Ward, George

Correspondence: Dear Friends, After waiting thirty-five years for the cows to go, I am greatly discouraged by the apparent direction this decision is taking. The cows should go where the oysters went: away. I believe the vast majority of the visiting public want to see the Peninsula as was five hundred years ago-not one hundred years ago. This is especially true given the scientific evidence regarding dairy farming and its destructive effect on the local environment, and its contribution to global warming. I believe this decision would be better made by following the mandate to preserve the natural environment-not ranching. Please cull the cows, not the elk. Sincerely, George Ward georgeward.com

#7124

Name: Marin Conservation League, Marin Conservation League

Correspondence: September 23, 2019

GMPA

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

Subject: Review Comments on the Point Reyes National Seashore General Management Plan Amendment - Draft Environmental Impact Statement

Dear Superintendent Muldoon:

Introduction

Thank you for this opportunity to provide comments on the Draft Environmental Impact Statement (DEIS) for the Point Reyes National Seashore and Golden Gate National Recreation Area North District (PRNS/GGNRA) General Management Plan Amendment (GMPA). Marin Conservation League (MCL) compliments the National Park Services (NPS) authors on a well-organized and presented DEIS.

The mission of MCL since 1934 has been to preserve, protect, and enhance Marins natural assets. In accordance with MCLs mission and goals, our comments are based upon the following assumptions and principles:

Since its founding 85 years ago, MCL has been instrumental in setting aside many of Marins most valuable lands for the public and has served as guardian of their unique resources for the enjoyment of future generations. In that spirit, MCL is committed to protecting the diverse flora and fauna, sensitive and endangered species, geology, culture and history, and scenic resources of PRNS from unacceptable impact.

MCL has also long recognized the valuable contributions of Marins historic agricultural community toward preserving open space in the County. This includes the successful and precedent-setting minimum parcel size limits established in 1970, referred to as A-60 in Marin Countys zoning code. It also includes the willing sales of ranches that were instrumental in forming PRNS/GGRNA and, specifically, the planning area for this GMPA and

DEIS;

The capacity of working farms and ranches to protect west Marins open and connected landscape, including the ranches in PRNS and the North District of GGNRA, requires a critical mass of land area and operating farms to remain viable ; and

A comprehensive understanding of the purpose, goals, and management objectives for PRNS/GGNRA that are reflected in the enabling legislation and that uniquely establish an historic agricultural landscape, including the grazing livestock ranches and dairy farms within the GMPA area, as culturally significant resources within PRNS.

These principles are supported in MCLs Agricultural Policy Statements (attached) stated goal:

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

We emphasized and linked this goal to this GMPA planning process and pending outcome in our scoping letter dated November 13, 2017 (attached) with the following statement:

We hold that there is a direct and mutually supportive connection between the GMPA and our agricultural policy and seek to partner with the National Park Service (NPS) and the ranch and farm families on the Seashore to realize this connection.

MCL Supports NPSs Preferred Alternative (Alternative B)

MCL considers the preferred alternative (Alternative B) presented in the DEIS to represent the best opportunities for environmental improvements compared to existing conditions. Furthermore, providing 20-year leases to 31 ranches on 28,700 acres provides a term of sufficient length to support NPS and leasing farmers in their collaborative efforts to manage the natural, cultural, historic, and scenic resources in the planning area. Accordingly, MCL supports Alternative B. We do have concerns about specific issues as described in the comments that follow. Our specific requests and recommendations for correcting deficiencies in the GMPA and DEIS are presented in italics.

Specific Comments and Recommendations

Implementation of Mitigation Measures in Agricultural Lease/Permits and Ranch Operating Agreements: Appendices D, K, and L (respectively, Management Activity Standards and Mitigation Measures, Biological Assessment - US Fish and Wildlife Service, and Biological Assessment - National Marine Fisheries Service) provide detailed and appropriate management practices and mitigation measures for long-term protection of soil, water, air, and biological resources. The draft PRNS and North District GGNRA Agricultural Lease/Permit references Appendix D 13 times for its standards and mitigation measures to be incorporated into proposed Ranch Operating Agreements (ROA).

The GMPA and Final EIS should include the Agricultural Lease/Permit and ROA templates as appendices and clarify how proposed standards and mitigation measures will be selected and implemented within the planning area to ensure that preservation strategies proposed in the DEIS are achieved. Additionally, Appendices K and L should be referenced, where relevant in the Agricultural Lease/Permit and ROA, as resources for identifying additional standards and mitigation measures for protecting threatened and endangered biological resources.

Visitor Use, Experience, Access, and Capacity: The DEIS is programmatic in its approach to the topic of Visitor Use. As stated in Appendix E, &this appendix contains potential recommendations& and &establishes a vision of the future& for visitor use (emphasis added). Similarly, the DEIS Executive Summary explains that Implementation of some programmatic direction, such as future development to facilitate public use and enjoyment, would require additional project-level planning and compliance& (emphasis added) Although MCL has aspirations for increased visitor use experiences and strategies to improve PRNS/GGNRA visitor capacity, we are also concerned about this topic and previously provided extensive comments on how it should be addressed

in the DEIS in our scoping comments dated November 28, 2018 (attached, page 2).

The analysis of options to achieve improved visitor experience and capacity in the DEIS is inadequate for the following reasons:

" It fails to provide sufficient detail regarding methods and modes for improving traffic congestion and vehicle management, and for reducing impacts at trailheads both within and outside the planning area.

" The DEIS assumes that visitor volume will be similar to historical numbers of 2.5 million per year. An adequate analysis for impact assessment purposes must anticipate that visitor numbers will surpass this annual volume over time, analyze related impacts, and identify measures to accommodate and avoid or mitigate localized impacts from the demands that more visitors will place on new trail networks, trail heads, and other locations used by visitors.

This inadequacy of the DEISs impact assessment should be corrected in the Final EIS.

Working landscape and cultural resource preservation: Table 2 in the DEIS (pages 27-30) lists specific strategies for the preservation of area resources within the planning area. These include strategies for protecting ecological functions, native and nonnative species, and cultural resources. The strategies for cultural resources provide for the protection and management of historic features, such as fences, buildings, and historic and prehistoric archeological sites. Missing from this table and desired conditions is preservation of the current working landscape as a cultural resource. As summarized from MCLs scoping letter (dated November 13 2017):

The cultural and historic resources that have been preserved in PRNS/GGNRA are the combination of the historic pastoral landscape and the multi-generational farm families, who, four and five generations later, are the legacy of the historic period of ranching and farming on the Point Reyes Peninsula which dates to the mid-1800s. The working landscapes they manage exemplify the national movement to strengthen local food systems; and they have contributed to maintaining the scenic resources of coastal grassland and other ecological riches that are the hallmark of PRNS/GGNRA. They also must comply with stringent state and federal environmental standards.

We believe that a preservation strategy for managing the cultural resources represented by operating farms and ranches is important for achieving the intent of the PRNS/GGNRA enabling legislation and amendments. As reconfirmed in the recently published House Joint Resolution 31, multi-generational ranching and dairying is important both ecologically and economically and is consistent with Congresss intent for the management of Point Reyes National Seashore. This approach is supported by the NPS Management Policies 2006, which include the parks scenery, natural and historic objects, and wildlife, and the processes and conditions that sustain them, including, to the extent present in the park&cultural landscapes& as being subject to the no-impairment standard, and that a cultural resource may be a tangible entity or a cultural practice. Appropriately, the two Historic Districts are cultural resources that are made up of features such as fences and buildings, and by historic vernacular landscapes that continue to be maintained by the historic and cultural activity and practice of ranching.

NPS, through the GMPA and Final EIS, should recognize this current connection between historic and ongoing active agricultural operations as a cultural practice and, therefore, a cultural resource subject to the no-impairment standard. This ongoing cultural practice represents an important cultural resource and exceptional educational opportunity for the public. The environmental, ecological, cultural, educational, and other socio-economic benefits that active agricultural operations bring to PRNS/GGNRA support NPSs mission and should be fully addressed in the Final GMPA and EIS.

Zoning and Subzoning Framework: MCL supports applying a new management zone, the Ranchland Zone, to the planning area. This will clear-up ambiguities that currently fail to clearly demarcate the planning area. MCL also generally supports the Subzoning Framework proposed in Alternative B with some qualifications. Successfully achieving both natural resource and agricultural management objectives may require implementing some practices across the boundaries between the proposed resource protection, range, pasture, and ranch core subzones. Managing fire fuels for example, must, by necessity, cross subzone boundaries. Similarly, integrating soil and water conservation practices, including carbon beneficial practices (listed in Appendix D), should relate to where on the landscape they can be most effective. MCLs scoping letter of November 28, 2018 (attached, page

3) recommended a planning approach that invests the Subzoning Framework with enough flexibility to enable working across subzone boundaries. This flexibility will enable management activities to be more effective in achieving environmental benefits and avoiding/mitigating adverse environmental consequences.

We conclude that the DEIS has not adequately considered the potential environmental benefits to be gained by incorporating this kind of flexibility into ranch zoning. The Final EIS must fully consider the adverse environmental consequences (such as increased wildfire hazard and greenhouse gas emissions) that can be minimized or avoided, as well as beneficial environmental effects (such as carbon sequestration) to be gained by working across subzone boundaries where feasible. If NPS does not feel such flexibility is warranted or appropriate, the Final EIS should clearly explain why not.

**Agricultural Diversification:** The justification for diversification of ranching activities appears only once in the DEIS under the description of Alternative A (Page 20): Diversification of ranching activities allows ranchers to react to poor forage production years and fluctuations in the economic market (e.g., the price of cattle, grain, hay). To enable the economic resilience implied in this justification, MCL supports the inclusion of proposed agricultural diversification activities as described under Alternative B, including limited row-crop production, pasture poultry raising, alternative grazing livestock species, and farm tours and stays, among others, as conditioned by the subzoning framework (Resource Protection, Range, Pasture, and Ranch Core).

The descriptions of potential diversification activities, however, raise questions that must be addressed in the Final GMPA and EIS as follows:

1. Is the option for 2.5 acres of unirrigated agriculture both viable and advisable as an agricultural enterprise? This approach implies dryland farming - i.e., relying upon winter rains to produce crops such as certain cereals or potatoes by tilling and seeding in the fall and harvesting in the spring. As an alternative, irrigation would afford the opportunity to produce crops that are planted in the spring and harvested through the summer and fall, thereby increasing the options and the economic viability of row crop farming. The Final EIS should consider this option, including mitigation measures for any potential impacts.
2. Could grazing by alternative species in the range zone achieve natural resource objectives like fire fuel reduction and prevention of vegetation type conversion, as well as protection of sensitive resources? Could the use of multiple species in a prescribed and rotational manner provide a diversity of options and opportunities in achieving preservation strategies outlined in the DEIS?
3. For dairy operations currently without silage production, could this important forage source be added within the pasture zone, with specific mitigation measures to reduce unacceptable impacts?
4. Finally, how might NPS staff, working with management and mitigation measures presented in Appendices D, K, and L, obtain technical advisory input to improve the economic viability of these proposed diversification activities, to fulfill the integrated objectives of ranch sustainability and natural resource stewardship?
5. The Final EIS should address the possible relationship between types of diversification and proliferation of pest species; the allowable techniques that ranchers might use to control such pests, including Integrated Pest Management for pest like gophers; and the potential impacts of pest species on sensitive resources in the park.

Planning and stewardship of agricultural lands in the planning area. The NPS preferred alternative (Alternative B) identifies future authorized activities within the planning area. These activities include modest agricultural diversification in the Ranch Core and Pasture planning subzones. The DEIS requires mitigation measures to be incorporated into individual Ranch Operating Agreements (ROAs) for each ranch activity. Further, many mitigation measures require consultation with NPS staff before activities can occur. Specific activities for each lease will be authorized in the respective ROA. There seems to be no comprehensive planning effort that will be completed on a ranch scale, however.

As an example, carbon farming is a collection of standard practices designed to maximize the lands ability to sequester carbon and reduce new greenhouse gas emissions while making farmland more resilient to a changing climate. As outlined in a Carbon Farm Plan some of these practices are big long-term goals, while others address near-term priorities. A Carbon Farm Plan serves as a guide to realize the potential climate benefits on the land, enable many other benefits these practices can have on ranch productivity and the environment, and identify

potential funding partners to help implement these practices.

Carbon farming practices bring many co-benefits beyond sequestering carbon and reducing greenhouse gas emissions. Practices are designed to benefit the natural environment and the agricultural operation. Some examples include:

Increasing carbon in the soil reduces soil erosion, promotes plant growth, and helps the soil hold on to more water. That means plants can grow longer into the dry summers, produce more forage for livestock and sequester even more carbon.

Restoring creek vegetation increases wildlife habitat, stabilizes creek banks, improves water quality and reconnects flood plains.

Rotational grazing promotes vigorous grasslands with deep roots, encourages native grassland species, and improves productivity.

Planting diverse windbreaks and hedgerows provides shelter to livestock and reduces the drying effects of wind, allowing pastures to stay green longer into the summer. They also increase wildlife habitat and provide species for native pollinators.

Using a methane digester for manure generates gas that can be burned for electricity and results in a more stable waste stream for applying back to the land.

The GMPA and Final EIS should make it clear that lessees in the planning area are allowed to work with qualified resource professionals, the Marin Resource Conservation District, the Marin Carbon Project and USDA Natural Resource Conservation Service to complete ranch-scale conservation plans or Carbon Farm Plans in the planning area. These plans will help NPS staff and the lessees write appropriate ROAs to incorporate best practices into their planning.

Succession: Separate from the DEIS, NPS has provided a draft Succession Policy for Ranch Operations within the Ranchland Zone for Point Reyes National Seashore and the North District of Golden Gate National Recreation Area that would be used in the event that named Lessees: (i) do not wish to enter into a lease/permit; (ii) cannot agree upon an arrangement among named lessees for continued operations under a new lease/permit, (iii) have not consistently met performance standards for the agricultural operation and other named Lessees are not willing to take on responsibility for improved operations&

MCL supports this draft succession plan because it would help to ensure the succession from current to future agriculturalists in the planning area and also ensure that practices that are currently maintaining the cultural landscape and heritage would continue into the future.

The GMPA and Final EIS should clearly describe this succession plan and incorporate it into the GMPA so the public is fully aware of the terms and conditions of lease succession.

Establishment and renewal of 20-year leases. Preferred Alternative B contemplates the establishment of 20-year leases for the existing agricultural operations within the planning area. MCL agrees with the establishment of 20-year leases because they will give the operators the certainty of tenure necessary to invest in the long-term success of their operations, including necessary ranch infrastructure improvements, improvement and diversification of agricultural operations, and improvements to natural resource values. However, the DEIS does not adequately address what happens to the leases established by the GMPA after the conclusion of the proposed initial 20-year lease period.

The DEIS dismissed analysis of rolling leases because they have no fixed termination date, are & not consistent with ranching in a setting as complex as the planning area&, and &the 2013 Secretarial delegation of authority to NPS and Congressional guidance directed NPS to consider issuing leases with 20-year terms.

MCLs scoping letter (November 28, 2018) stated that while the proposed 20-year leases are a good first step. . . , longer leases would contribute greater confidence and stability. We suggested that the EIS should also describe methods for how the proposed 20-year leases could serve a longer time period (e.g., perhaps through 5-year

incremental extensions).

NPS has provided a copy of the Draft Agricultural Lease/Special Use Permit (draft lease) in response to prior public comments. The draft lease, on page 9, Section 5.3 contemplates an extension of the lease:

Six months prior to the Expiration Date of the lease, NPS may offer this lease, or a similar lease, to Lessee. If Lessee fails to execute a subsequent lease prior to the Expiration Date, the Provisions of this Lease regarding Lessee's obligations to surrender and vacate the Premise shall apply. Lessor has no obligation to offer a subsequent lease to Lessee.

The DEIS does not address the conditions necessary for NPS to offer this lease or a similar lease, to Lessee. This creates uncertainty for the future of ranching operations in the planning area after the 20-year leases reach their term and could potentially lead to unnecessary future litigation. The public should understand the conditions and terms of this or similar lease that may be offered to the lessee as well as the conditions that would lead NPS to not offer such a lease to the operator(s).

MCL believes that the topic of renewal and succession should be documented and understood as part of the GMPA and addressed in the Final EIS, in that both socioeconomic consequences (e.g., the cultural continuity of agriculture on the Seashore) and environmental consequences (e.g., the ability of ranchers to continue funding environmental improvements) could be either positive or negative depending on the manner in which renewal or succession is managed on the expiration of the initial 20-year term.

Therefore, GMPA and Final EIS should consider the environmental and cultural consequences of various options that may occur when 20-year leases are nearing expiration. The GMPA and Final EIS should make the procedure for lease renewal clear including a significantly longer time frame than 6 months prior to expiration to renew or issue new leases, and that includes the conditions and terms of the same or similar new lease and the conditions for not offering such a lease. Providing for renewal only 6 months prior to expiration is inconsistent with and may frustrate the purpose of an initial 20-year lease and is inherently inconsistent with Secretarial and Congressional guidance concerning the 20-year leases. The Final EIS should address and resolve this issue because not providing the analysis and approach for this impending decision at this time defers a lengthy debate and planning process to 20 years from now. It also places the cultural resource of active agricultural operations and continued funding support for environmental mitigations in a state of uncertainty and at risk in the future.

**Lease Appraisal Process.** Under its preferred alternative (Alternative B), NPS proposes to implement a master appraisal process managed by the US Department of Interior (DOI) to determine the FMV for park ranch operations. MCL could not find guidelines for such a master appraisal process on DOI's website or in the Uniform Standards of Professional Appraisal Practice (USPAP). Without a clear guide for the appraisal process, the referenced master appraisal process could lead to lease values that are fair for some leases but may not be economically viable for others. This could effectively price operators out of their leases.

The Final EIS should clearly explain the appraisal process for the proposed 20-year leases and explain what will be done to ensure that it is fair and equitable to all lessees given the significant mitigation measures that would be applied to all ranching activities allowed under the preferred alternative. The costs of implementing these measures should be considered for each lease when DOI appraises the value of the potential leases.

**Elk Management:** The DEIS and appendices provide a thorough description of the affected environment with respect to the tule elk herds in the GMPA planning area.

MCL believes that NPS has done a credible analysis of the management alternatives potentially available to it for the elk herds at PRNS, and generally supports the proposed elk management program described in Alternative B, the preferred alternative. We conclude that the overall approach to managing elk for coexistence with the cattle and dairy ranches at PRNS is reasonable and based on sound science and judgment by qualified professionals. MCL does, however, have specific concerns and comments regarding the proposed management program for elk, including some that involve adequacy of the DEIS as follows:

Model to Predict Rangeland Residual Dry Matter (Appendix I): The Forage () R model described in detail in Appendix I of the DEIS is a credible effort to provide an objective, scientific means to measure and manage for an acceptable level of competition for forage between elk and livestock on ranches impacted by elk. We understand that the model was developed for this GMPA and DEIS (i.e., it is not an established model that has undergone monitoring and refinement over a long period of time). As such, it can be regarded as untested, so there should be very clear procedures specified regarding how adjustments, exceptions, and professional judgment would be applied quickly in the event that any of the affected ranchers can demonstrate that it is not working as intended for their individual operations and, as a result, their operations are being adversely affected.

As stated in the DEIS on page 41, the intended objective for managing the Drakes Beach elk herd is to maintain the herd at a population level compatible with authorized ranching operations. However, there must be some recognition of, and method for dealing with, the variability among individual ranches in achieving this overall objective. The fact is, some ranches may not experience an acceptable level of compatibility/coexistence with elk as a result of applying this model while others will. This includes during extended periods of low rainfall and drought. There should be a clear procedure and criteria established to address a significant threat to the economic viability of any of the ranching operations. If any of the ranching operations prove to be in danger of failing as a result of not reaching an acceptable level of coexistence with elk, the stated objectives of the NPS for managing PRNS in the planning area cannot be fully achieved. Having a process defined that would do everything possible to prevent this would significantly help to avoid/mitigate potential adverse socioeconomic impacts to the region.

The GMPA should be revised to recognize and describe a procedure for addressing the potential seasonal and annual variability in the degree of success that may occur to individual ranching operations as a result of applying the model. The procedure should include a description of how the model will be applied, monitored, and adjusted to quickly respond to problems that may be identified at any of the affected ranches. The Final EIS should address the potential socioeconomic consequences should any of the ranching operations fail as a result of not doing so. We believe that the DEIS is presently inadequate without this analysis.

Fencing. The DEIS describes how fencing would be used as a management tool for a variety of objectives with respect to elk. The discussions, however, focus on using fencing as a means to enclose elk in a defined area. We did not find any discussion of how and whether it would be feasible and beneficial to use fencing to exclude elk from certain areas to reduce competition for forage or otherwise reduce conflicts with livestock.

The Final EIS should address fencing to exclude elk from certain areas in order for the public to understand if this is feasible and how it could be employed.

Lethal vs. nonlethal population control. MCL supports control of the Drakes Beach elk herd to maintain a maximum number of 120 animals as proposed in Alternative B. We encourage the use of nonlethal methods whenever feasible and understand this is not currently possible or practicable for reasons that are clearly explained in the DEIS. NPS has indicated that lethal methods will be employed as a last resort in the future to achieve the maximum herd size proposed. We support the use of lethal methods under those circumstances. We also concur that fertility control is not a practicable method of population control for the reasons explained in the DEIS. In evaluating population control options in the future, we encourage NPS to also consider humane treatment as an important criterion.

## Conclusion

MCL, as an established local environmental organization in Marin with an 85-year history, has the institutional experience to know, but for the fact that Congress, local conservationists, and the agricultural farmers and ranchers cooperated to create the PRNS, we could be living in an alternative condition of housing and recreational development. Therefore, among other significant policy decisions and opportunities, MCL actively supported the formation of PRNS and GGNRA as fundamental to preserving the diverse and priceless natural resources and scenic landscape that is west Marins condition today, enjoyed by millions of visitors from around the world. Working ranches on PRNS and GGNRA have played a major role in maintaining a landscape that



contributes to the economy and helps to protect natural ecosystems that are part of our national heritage. Because of these connections, ranching as an important element in the parks (PRNS/GGNRA) will continue to be important to MCL and to that end we offer these comments.

Respectfully,

Linda J. Novy  
President

Attachments:

1. Marin Conservation League Agricultural Policy Statement dated October 14, 2015
2. Marin Conservation League Comment letter dated November 13, 2017
3. Marin Conservation League Comment letter dated November 28, 2018

Attachment 1:

Marin Conservation League  
Agriculture Policy Statement

## OVERVIEW

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

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

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

On-going threats to Marin's agricultural community remain much as they have been in the past: skyrocketing property values, which encourages urbanization, family succession challenges, invasive plants, and, more recently, uncertain climate and rainfall conditions. Along with A-60 zoning, supportive Countywide Plan policies, and strong Coastal Zone protections, the purchase of conservation easements by the Marin Agricultural Land Trust and enrollment in the Williamson and Super Williamson Acts has helped stay the hand of developers and estate ranchers. Ninety percent of Marin's ranches are protected in this way.

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

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

#### STATED GOAL

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

#### POLICY

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

Following are policy statements that specify and clarify Marin Conservation Leagues goals and concerns.

Natural Resources Management:

1. Support sustainable management of grassland and rangeland, which provides critical forage for livestock, while fostering wildlife habitat and preserving native plants.
2. Support soil management practices that lead to increased water-holding capacity and an increase in organic matter in the soil.
3. Support soil management practices such as the use of the no-till drill, which minimize soil disturbance, prevent soil loss and reduce the flow of sediment into streams, bays and the ocean.
4. Encourage the alignment of local conservation programs and practices with the goals of the Healthy Soils Initiative as described on the California Department of Food and Agriculture website.
5. Support development restrictions within 100 feet or more of wetlands and stream conservation areas, as defined in the Countywide Plan (BIO-3.1 and 4.1) to protect wetland and stream habitats.
6. Support the management of invasive plants through Integrated Pest Management, including chemical measures, where other control measures are infeasible or ineffective.
7. Support the federal Clean Water Act 1974 and Endangered Species Act 1973, and Californias Porter-Cologne Act of 1969 because of their broad powers in protecting natural resources.
8. Encourage those conservation practices that reduce the delivery of pathogens, sediment, mercury and nutrients to our waterways and all bodies of water.
9. Promote the efficient use and reuse of water on farms and ranches to meet their agricultural needs. Maintain water infrastructure, and if old sources become insufficient, consider developing new sources of water only if adverse environmental impacts can be avoided.
10. Support carbon farm planning and implementation of the United States Department of Agriculture's Natural Resource Conservation Service's carbon-beneficial practices.
11. Support assisted ranch management planning and cost-share implementation of best management practices, rather than depend principally on enforcement to attain compliance with environmental regulations.
12. Encourage efficient energy management and the production of renewable energy resources on and for individual ranches, such as wind, solar and methane digestion, where adverse environmental impacts can be avoided.
13. Discourage the development of large wind and solar farms on agricultural lands for commercial purposes, due

to energy production inefficiencies, installation and transmission impacts, visual impacts such as disharmony of scale and inconsistency with rural character, and environmental impacts such as wildlife and habitat degradation.

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

#### Partnering Agencies:

15. Support the Grazing and Dairy Permit Waiver Programs of the Regional Water Quality Control Board.
16. Support funding and technical support to farmers and ranchers seeking to improve water quality and fisheries habitat.
17. Support national, state, local, and private funding for conservation implementation programs through Marin Resource Conservation District, Marin Agricultural Land Trust, and Natural Resources Conservation Service.
18. Support landowner education and permitting facilitation through county-funded positions, such as the Marin Resource Conservation Districts Stream Coordinator position and the University of California Cooperative Extension's Agricultural Ombudsman position.
19. Encourage the County to control invasive plants on County rights of way and on open space preserves, to prevent invasives from spreading onto ranchland.
20. Support coordination programs between permitting agencies, such as the Marin Resource Conservation Districts Coastal Permit Coordination Program, which bundles permit requirements over several agencies to promote efficiencies and to reduce the financial burden on agencies and landowners.
21. Support the inclusion of the Local Coastal Program permitting requirements in the recertification of the Marin Resource Conservation Districts Coastal Permit Coordination Program.
22. Endorse the role of Marin Agricultural Land Trust, Marin Resource Conservation District, the Natural Resources Conservation Service, the Ag Institute of Marin, the Marin Dept. of Agriculture, the Marin Community Development Agency and the University of California Cooperative Extension Service, the Regional Water Quality Control Board, and the California Department of Fish and Wildlife in preserving and protecting Marin County's agricultural heritage and natural resources, and supporting the best management practices which foster long range productivity and environmental protection.

#### Zoning and Land use:

23. Support a critical mass of agricultural production (e.g., sufficient number of dairies, acres of beef production, small-scale crops, etc.) needed to maintain the demand for goods and services that are necessary to support a viable agricultural economy in Marin County.
24. Balance ranchers' desire for flexibility in cropping decisions with the need to not exceed impact thresholds or standards for grading quantities (e.g., terracing), irrigation, and setbacks from streams, wetlands, and other sensitive resources.
25. Support Marin Countywide Plan and Coastal Zone policies that limit residential development on agriculturally zoned land, and limit the size of farm residences.
26. Limit development of farm dwellings and ancillary structures to clusters within 5% or less of total ranch acreage. (See Marin Countywide Plan AG-1.6).
27. To facilitate intergenerational succession on family farms in the Coastal Zone, support up to two dwellings in addition to the farmhouse per farm tract (defined as all contiguous lots under common ownership), as conditioned in the Land Use Plan of the Local Coastal Program, adopted August 25, 2015 by the Board of Supervisors.<sup>[i]</sup>
28. Support affordable, safe and healthy housing for Marin's largely permanent farm workforce both on-farm and in nearby villages.
29. Support policies, programs and zoning that restrict subdivision of agricultural lands by requiring demonstration that long-term productivity of agricultural on each parcel created would be enhanced. (See Marin Countywide Plan AG-1.5).
30. Maintain a minimum A-60 zoning, as it has been instrumental in protecting agriculture, maintaining open space values, and preserving the rural character of West Marin.
31. Support the County of Marin's Affirmative Agricultural Easement Program and MALT's Mandatory

Agricultural Easement Program, which are listed in the LUP of the LCP as a program to evaluate: Program C-AG-2b Option to Secure Affirmative Agricultural Easements Through Restricted Residences&etc.

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

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

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

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

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

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

Footnote to Item #27 \_\_\_\_\_

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

References:

Three Essential Documents:

1. 2007 Marin Countywide Plan <http://www.marincounty.org/depts/cd/divisions/planning/2007-marin-countywide-plan>

2. Development Code (aka Zoning Ordinance)

[https://www.municode.com/library/ca/marin\\_county/codes/code\\_of\\_ordinances?nodeId=TIT22DECO](https://www.municode.com/library/ca/marin_county/codes/code_of_ordinances?nodeId=TIT22DECO)

3. Zoning Maps\* (<http://www.marinmap.org/Html5Viewer/Index.html?viewer=mmdataviewer>)

\* MarinMap serves up County geographic data including Zoning. There doesnt seem to be a free-standing Zoning Map accessible on the web. The MarinMap screen shot County Zoning document provides a generalized picture of the Zoning, and a MarinMap Viewer set to Zoning can be used on the above website with the Layers toggled on or off as shown to get more refined information.

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

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

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

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

pgs.

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

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

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

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

Attachment 2:

November 13, 2017

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

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

Dear Acting Superintendent MacLeod,

Introduction

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

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

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

the unique natural resources as well as the working landscape within the Seashore.

### Specific Comments

We offer the following specific comments as initial considerations and recommendations for issue identification and the refinement and analysis of alternatives during the GMP Amendment planning process and environmental review under the National Environmental Policy Act (NEPA). MCL will continue to participate in the GMP Amendment planning and review processes during coming years.

### Land Allocation

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

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

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

### Leases

Lease length is directly related to the strength and viability of farming and ranching operations. Long leases promote long-term viability of ranching operations by providing the ability to reliably forecast economic costs and returns. This includes investments in infrastructure upkeep, natural resource management, maintenance of healthy water and air quality, and assurances of farm employees welfare. The proposed 20-year leases are a good first step to create this environment for success. Longer leases would contribute even greater confidence and stability. When structuring leases, NPS should give consideration to these points, and also describe methods for how the proposed 20-year leases could serve a longer time period (e.g., perhaps through 5-year incremental extensions). For example, when a lease runs for five years, the lease should be extended for another 20 years so that the ranchers will have the "long term equity" to support their infrastructure upkeep, resource management, farm work force and necessary viable financing opportunities.

### Elk

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

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

### Park Resources and Visitor Carrying Capacity

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

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

### Visitor Access and Experience

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

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

### Cultural and Historic Resources

The PRNS/GGNRA are unique among national park units in that they have successfully implemented the integration of a pastoral landscape and its active ranching traditions with large areas of natural landscape and wilderness. The cultural and historic resource that has been preserved in PRNS/GGNRA is the combination of

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

### Community and Agricultural Economy

Agriculture on the PRNS/GGNRA represents about 19% of the areal extent and 19% of total production in Marin County. Per the 2016 Marin County Crop Report, total gross production value was \$96.5 M. Accordingly, the contribution of PRNS/GGNRA agricultural production to total county production is \$18.3M. This does not include multiplier effects through processing and value-added production, which can be 3 to 4 times that amount, resulting in a value of about \$73.2M. In terms of employment, every on-farm job is matched by 3 to 4 jobs in other off-farm related agricultural businesses. In 2012, Marin County employed 1,072 farm employees (USDA 2012 Ag. Census) resulting in as much as 4,288 off-farm jobs. PRNS/GGNRA's contribution to on-farm employment is 204 employees and a corresponding 815 off-farm employees. The loss of \$73.2 M in annual production, and as many as 1,019 jobs, would be devastating to the agricultural community and the region as a whole. MCL asks that, in analyzing alternatives for the GMP Amendment, full consideration be given to the impacts each proposed alternative would have to this significant contribution to the local and regional economy. Proactively, we recommend that these benefits be referenced, as appropriate, in NPSs purpose and need statement for the GMP Amendment.

### Sustainable Agriculture and Regulatory Compliance

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

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



reduction strategies that can be implemented at agricultural operations on PRNS/GGNRA (e.g., carbon sequestration management practices).

## Glossary and Index

We believe the GMP Amendment process would facilitate better community participation through the inclusion of a glossary of terms in the Draft EIS. Examples include but are not limited to terms like operational flexibility, carrying capacity, and visitor experience.

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

## Conclusion

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

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

Thank you for considering these comments.

Respectfully,

Kate Powers  
President

Attachment 3

November 27, 2018

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

Subject: Point Reyes National Seashore General Management Plan Amendment - Draft Environmental Impact

## Statement Scoping Comments

Dear Superintendent Muldoon,

### Introduction

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

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

In accordance with our goals, and consistent with MCLs previous positions and actions regarding agriculture and our mission to conserve Marins national park assets, we are in full support of the continuation of ranching and dairy production on the PRNS and GGNRA.

Furthermore, MCLs position is consistent with PRNS enabling legislation and the statutory history that provided for ranching operations to continue within a designated pastoral zone (agricultural properties) and thus ensure that future generations would be able to participate in the parks working landscapes. This promise was reinforced by a 2012 directive from then Secretary of the Interior Ken Salazar, offering 20-year leases to the multi-generational ranching families.

In sum, MCL & holds that there is a direct and mutually supportive connection between the GMP amendment and our agricultural policy and seek to partner with the National Park Service (NPS) and the farm families on the Seashore to realize this connection as stated in our letter dated November 13, 2017 (attached for inclusion in the administrative record with this letter providing MCLs specific comments for EIS analysis of the proposed action and alternatives presented in the EIS NOI materials).

MCL also believes that a robust analysis under the National Environmental Policy Act (NEPA) of all alternatives in the GMP Amendment, including those required by a legal settlement, will enable NPS to understand and evaluate the possible mitigation and management measures that could improve the environmental sustainability of the ranches and dairies, and inform a broad range of land management policies and decisions, including lease/special use permit succession planning, elk management, visitor access, and conservation practices to protect natural and cultural resources, coastal rangeland, and water and soil quality, among others.

At this time, NPS is seeking comments on what topics should be analyzed in the EIS, as well as on potential refinements to the proposed action and other alternatives. MCL offers the following comments regarding the scope of issues that the EIS should address.

### Specific Comments

#### Visitor capacity, access, and circulation

" The EIS should evaluate visitor shuttle models that relieve congestion and parking constraints. Shuttle service could also contribute to a stronger visitor experience with PRNS/GGNRA by getting visitors out of their automobiles. This could also serve to mitigate environmental impacts by reducing vehicle traffic, idling time (emissions) resulting from congestion, etc. Examples and models are in operation throughout the National Park system that achieve these objectives.

" The EIS should analyze annual, seasonal, peak-day, and daily visitor volumes that can be effectively supported by PRNS staffing and infrastructure resources. MCL views this GMP Amendment and EIS as an opportunity to

explore and implement a variety of tools for visitor access and participation. MCL is supportive of many of the elements common to all action alternatives but believes they should be based upon a complete understanding of visitor capacity in the planning area to be evaluated in the draft EIS.

" The EIS should, for each alternative analyzed, identify and consider integrated resource management and visitor access solutions that address shared issues and provide solutions across the proposed planning area and surrounding region. Examples include loop routes, connectivity with adjacent public lands, and facilitation of north-south connectivity across the landscape. This is also the case for issues like vegetation and fire management and the conflicts posed by the free-ranging elk. A visitor's experience at PRNS inevitably crosses the boundary between portions of PRNS inside and outside the GMP Amendment planning area. These solutions should be holistic and comprehensive, recognizing the visitor and resource connections and relationships that exist across the proposed planning area boundary.

#### Ecological buffers and natural resource protections and

" The EIS should identify new infrastructure (e.g. fencing among others) required to create ecological buffers identified for all the alternatives, as well as plans for the long-term maintenance of new and existing buffer infrastructure. The concept of buffers is, on its face, one that MCL supports. While all ranches require infrastructure in place to protect sensitive resources, including rare and endangered plant and wildlife species, proposed buffers should be situated strategically to protect sensitive resources, but in ways that do not overly impact any single ranch. Additionally, significant consideration should be given to buffers that have already been put in place and not formally named. Management objectives and requirements of these buffers should be addressed, including the avoidance of undesirable invasive plant species and the unintended consequence of disrupting native plant communities and harming sensitive species that depend on a grazing regime for survival.

" The EIS should account for environmental benefits and protections provided by previously implemented best management practices (BMPs) and additional benefits derived by to-be implemented BMPs. Specifically, the EIS should describe the management measures that NPS staff and the ranchers are currently using and plan to use to safeguard and provide continued, needed improvements to water quality. These practices represent the multi-objective solutions critical to achieving NPS goals and mandates for the PRNS/ GGNRA. They are also the primary means for compliance with federal and state environmental regulations for respective Grazing Lands and Dairy Conditional Waivers for Waste Discharge Requirements approved and implemented by the San Francisco Regional Water Quality Control Board. These require that NPS staff and ranchers evaluate potential impacts to surface and groundwater from grazing livestock and manure management and implement practices that mitigate those impacts.

" The EIS should consider a transparent and rancher participatory process, using the best available information and science to develop the Conservation Framework and the Land Management Units. The NPS proposes applying this basic zoning framework of core, pasture, and rangeland zones to all action alternatives that include ranching, in order to streamline the permitting process [for ranchers and NPS staff] and provide consistent guidance to ranch operators while ensuring the protection of natural and cultural resources. The EIS also should consider as an alternative, whole ranch conservation and carbon farm planning methods already used to achieve integrated soil and water conservation on grazing livestock ranches and dairy farms. The impetus and opportunity with these methods is to use tools and approaches that facilitate consistency in conservation practices to identify and address resource problems and realize land management opportunities that might cross any proposed LMU boundaries or become evident after the GMP is completed.

" The EIS should comprehensively analyze both Green House Gas (GHG) emission reduction and offset strategies that can be implemented through all sectors across the planning area, including on PRNS/GGNRA farms and ranches (e.g., carbon sequestration management practices). MCL, consistent with the State of California and beyond, is committed to finding solutions for climate change, including GHG emission reductions. Through its Climate Action Working Group, MCL has worked with the County of Marin and other stakeholders to develop (by commenting on) a relevant Climate Action Plan (CAP) for Marin in response to California Assembly Bill 32. The Marin CAP provides an accurate inventory of GHG emissions for Marin County (including 5% from agriculture) that is consistent with California and United States inventories. Furthermore, the Marin CAP recognizes that agriculture, through conservation practices and by serving as a carbon sink, can offset emissions and make a significant contribution to obtaining Marin CAP GHG emission reduction objectives. The potential for a positive net change in agricultural carbon flux on the ranches and dairies over the range of

alternatives should be estimated.

#### Elk management

" The evaluation of elk management options should recognize the variability in scale of conflict between grazing livestock beef ranches and dairy farms. The EIS should analyze a full range of management methods, either individual or in some combination of methods and including separation, that respond to and reflect these differences to effectively relieve those conflicts.

#### Nexus of agriculture and resource management

" The EIS should also describe how NPS could benefit public knowledge of historic districts and ongoing ranching in the park by engaging ranchers and other partners in interpreting the agricultural story within the planning area and its connections outside the planning area. This EIS analysis point is also relevant to visitor experience.

" The EIS should thoroughly analyze how the maximum allocation of land to grazing livestock and dairy farming provides needed on-the-ground resource management that might otherwise be beyond the capacity of NPS and how it achieves the cultural and natural resource preservation and management objectives of the NPS for PRNS and GGNRA.

" The EIS should analyze the role farm families provide as partners in resource and infrastructure management in the face of decreasing NPS budgets and resources to do the same. This important long-term socioeconomic effect should be compared in the EISs evaluation of various alternatives, especially those that would severely limit or eliminate ranching.

#### Lease length and succession

" The EIS should evaluate options for lease continuation beyond the proposed 20-year term in the proposed action. This includes preparing the process and detailing a plan for lease renewal in advance of the proposed 20-year leases expiring. Lease length is directly related to the strength and viability of farming and ranching operations. Long leases promote long-term viability of ranching operations by providing the ability to reliably forecast economic costs and returns. This includes investments in infrastructure upkeep, natural resource management, maintenance of healthy water and air quality, and assurances of farm employees welfare. The proposed 20-year leases are a good first step to create this environment for success. Longer leases would contribute even greater confidence and stability. The EIS should thoroughly analyze longer term leases and the potential benefits that may be gained in environmental and socioeconomic effects. The EIS should also describe methods for how the proposed 20-year leases could serve a longer time period (e.g., perhaps through 5-year incremental extensions). In the event that a ranch succession plan anticipates that there will be no family successor in future years, the EIS should also analyze alternatives and recommend a process for determining a successor or other options that would either continue, discontinue, or modify agricultural operations on that ranch

#### Socioeconomics

" The EIS should analyze the socioeconomic benefits that the ranching operations on PRNS and GGNRA provide to West Marin and Marin-Sonoma communities, including employment, school enrollment, and support industries. Agriculture on the PRNS/GGNRA represents about 19% of the areal extent and 19% of total production in Marin County. Per the 2017 Marin County Crop Report, total gross production value was \$89 M. Accordingly, the contribution of PRNS/GGNRA agricultural production to total county production is \$17M. This does not include multiplier effects through processing and value-added production, which can be 3 to 4 times that amount, resulting in a value of about \$68M. In terms of employment, every on-farm job is matched by 3 to 4 jobs in other off-farm related agricultural businesses. In 2012, Marin County employed 1,072 farm employees (USDA 2012 Ag. Census) resulting in as much as 4,288 off-farm jobs. PRNS/GGNRAs contribution to on-farm employment is 204 employees and a corresponding 815 off-farm employees. The EIS should analyze the impact of potential loss of \$73.2 M in annual production, and as many as 1,019 jobs on the community and the region.

## Conclusion

MCL played a significant role in the initial legislative establishment of both PRNS and GGNRA and has supported them for decades as incomparable public assets that provide experiences in wilderness and natural lands, recreation, and working landscapes. MCL has also enjoyed a long, successful, and rewarding relationship with Marins multi-generational agricultural community whose voluntary sale of their land to the NPS made it possible for both PRNS and GGNRA to realize the shared goal of protecting an open and connected landscape from significant development that could have decimated that landscape. The success of this relationship is a working landscape within the two national parks and beyond, with strong community ties, a contributing economy, connected landscapes and protected natural ecosystems.

Respectfully,

Linda J. Novy  
President

#7125

Name: Smith, Logan

Correspondence: I support option A because I believe both the historic ranchers and the Tule Elk are important. The ranches have been in Point Reyes for hundreds of years, and shouldn't be removed. At the same time, the Elk are endangered and need to be supported/helped, and not killed.

#7126

Name: Kalber, Brandon

Correspondence: I support Alternative F: No ranching.

The mission of national parks is to protect native plants and animals, and the Environmental Impact Statement says that the land, water, and wildlife of the national seashore are being harmed by cattle.

Removing native Tule elk from the park to benefit the ranchers is built into four of the NPS alternatives, including the NPS's "preferred alternative." The EIS says that the Seashore's land, water and wildlife would benefit were ranching to cease. But there is no plan for protecting wildlife from ranching's impacts or mitigating habitat loss from cattle grazing or growing crops. Other than killing Tule elk, there is no discussion of avoiding wildlife conflicts. Alternative F: No ranching is the only option that avoids wildlife conflicts.

Cattle are the leading source of greenhouse gases at the Seashore. Methane, produced by cattle, is a greenhouse gas 25x-100x worse than carbon dioxide. There is no discussion of mitigation for cattle's impacts to the climate in any of the NPS's ranching alternatives.

#7127

Name: Morrison, Colleen

Correspondence: As a taxpayer and wildlife lover I strongly oppose the National Park Service's plan to shoot native native tule elk in Point Reyes National Seashore to make room not only for beef and dairy cattle, but for new, expanded use that will include sheep, goats and chickens in the pastures, and pigs and row crops in other parts of the Seashore.

The Point Reyes National Seashore and the northern district of Golden Gate National Recreation Area were not preserved as national parks to for the purpose of cattle grazing and livestock raising. The ranches were purchased by the government and the ranchers were given more than adequate time to move elsewhere. The National Park

Service now has an unprecedented opportunity to end ranching on our public lands in these parks-doing anything else would be a grave disservice to the American people, as well as to the incredible diversity of native plants and wildlife that actually belong on these lands."

The proposed park management plan allows destructive levels of livestock grazing to continue on 28,000 acres of national park lands in this treasured Pacific Coast landscape, despite the many known adverse impacts livestock grazing has on coastal prairie, riparian systems, springs, wetlands, and coastal dune vegetation.

Many experts and wild lands preservation groups have weighed in and signed a comment letter on the draft Environmental Impact Statement demanded that conservation values must be placed first and I strongly agree. The proposed General Management Plan amendment being analyzed fails to protect and restore Point Reyes National Seashore and Golden Gate National Recreation Area.

The National Park Service should be managing the National Seashore for the benefit of wildlife and the natural ecology. Emphasizing livestock ranching while subsidizing welfare ranchers is a takings of public land. Livestock don't belong on our public lands where they degrade the land and pollute the water. This disastrous plan must be stopped. The American people don't want our public lands and wild places turned into livestock operations and our wildlife slaughtered.

Stop this irresponsible plan now!

#7128

Name: Hennessy, E

Correspondence: I am writing to voice my opposition to the NPS plan calling for the shooting of native Tule Elk with the intent to expand cattle ranching and commercial agriculture at Point Reyes National Seashore and Golden Gate National Recreation Area (GGNRA). The elk would also be hazed off of 18,000 acres of the park to benefit expanded agricultural activities. Under this plan, the goal is to kill "excess" Tule Elk in to establish an arbitrary 120-member population threshold for the Drakes Beach herd.

Not only would this deadly plan sanction the senseless killing of Tule Elk but would greatly damage wildlife habitat, threaten endangered species, result in the degradation of water quality and spark new conflicts with other wildlife. Such destruction of wildlife and the environment is being proposed merely to pander to a small minority of special interests, namely livestock ranchers, who would be the sole beneficiaries of this misguided plan.

The plan would extend 20-year lease terms to 15 private dairy and beef ranches in the park, on approximately 26,100 acres. The plan would expand ranching leases into an additional 7,600 acres of the park that are currently not authorized for cattle ranching.

If this plan for expansion of commercial livestock farming, including the introduction of sheep, goats, pigs or chickens, were to be approved, how long would it be before ranchers with a sense of entitlement would call for the eradication of other wildlife such as coyotes, bobcats, foxes and birds they deemed a threat to their financial gain and to ensure their monopoly of this public lands area?

This plan also seeks to permit conversion of park grasslands and wildlife habitat at Point Reyes to artichoke farms and other row crops. Agricultural activities such as these would cause untold damage to the land and would be responsible for wiping out a native species.

The successful reintroduction of Tule Elk to the Point Reyes peninsula has had positive impact on the conservation of native species and restoring ecosystems, in keeping with the mission of the National Park Service.

Allowing unchecked commercial agricultural activities known to cause significant damage to our public lands is flies in the face of your stated mission to "preserve 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 expansion of commercial livestock and crops in this special place so highly valued by the public would, in fact, harm the majority of Americans by marring their visitor experience for the benefit of a few who seek special treatment for personal profit with no concern about the destruction they would cause to the area and its wildlife.

The Drakes Beach elk herd is one of two free-roaming herds in the park. Allowing elk to roam freely is critical to their survival. More than half the elk in the Tomales Point herd, which is fenced in on a peninsula to pacify ranchers, perished during a recent drought due to a lack of water and nutritious forage. Shockingly, invasive domestic cattle at the Seashore far outnumber native Tule Elk by nearly 10 to 1.

The majority of Tule Elk are confined to Tomales Point behind an 8-foot fence blocking them from eating grass leased to ranchers. Over 200 elk, half of the confined herd, Half the perished during the recent drought due to lack of water and nutritious forage. There is a free-roaming herd of Tule Elk herd near Drake's Beach, adjacent to parklands grazed by cattle. Ranchers bemoan these elk compete with their cows for grass they think is theirs alone.

To appease these ranchers, NPS proposed solutions including killing, restrictive fencing, and removing the native elk. At present, they conduct daily hazing, running the elk off the leased range. However, under the 1962 law that established Point Reyes National Seashore, cattle grazing is not mandated but is at the discretion of the Secretary of the Interior.

The negative environmental impacts caused by commercial ranching and dairy operations including overgrazing of invasive livestock is well known. Such commercial activities ultimately result in soil erosion, diminished water quality, damage to endangered species habitat as well as the spread of invasive plants.

For decades, NPS authorized grazing permits allowing 5,000-6,000 beef and dairy cattle to graze year-round on national parklands without issuing an EIS or allowing the public to speak in opposition. Thanks to a 2016 lawsuit, NPS must release an EIS on commercial ranching and dairy operation impacts at the National Seashore, including the negative impacts by ranchers and their destructive practices in this treasured place.

As an American citizen who cherishes our nation’s special wild places, I strongly OPPOSE this blatant anti-wildlife plan to kill or eradicate native Tule Elk from Point Reyes National Seashore and Golden Gate National Recreation Area. It will do absolutely nothing to mitigate the ongoing damage to the environment being wrought by cattle ranching. Expanding such destruction to make way for more harmful activities will ensure the ruination of this special place to the detriment of native Tule Elk, endangered species and other wildlife, native plants, the water and air, the local economy and the enjoyment of this unique area for myriad visitors.

I call on NPS to REJECT this disastrous plan to expand agricultural activities at Point Reyes National Seashore and Golden Gate National Recreation Area and plans to kill native Tule Elk, jeopardize other wildlife and wreak havoc on the environment in this irreplaceable ecosystem that should be protected and preserved for generations to come.

Thank you for your consideration.

#7129

Name: Wallace, Brenda

Correspondence: Dear Sir or Madame: Please do not allow the extension of leasing of public lands to cattle grazing, or other commercial agricultural pursuit. I also have heard that you are considering expanding the type of commercial farming activity, i.e., diversification of farming species, to occur on public lands at Point Reyes seashore. Instead, I urge you to adopt Alternative F of the proposals, phasing out ranching, and managing the land, water and wildlife. Do not shoot the gorgeous Tule Elk!

The public has already paid for this land to be kept wild. Currently, the Park Service is permitting this public land, and the native species which originally inhabited it, to be despoiled and destroyed. This is a travesty, a disgrace, and is certainly outside the bounds of the legislation which is supposed to protect the land from exploitation. The Park Service is clearly in breach of the fiduciary duty it owes to the people of the US who paid for this wild land to be set apart from exploitation. And of course, it is an utter betrayal to allow the native species to suffer and die, or to be displaced, due to what may very well be illegal exploitation of this land by commercial agribusiness.

There is no saving grace to be had in falsely identifying these commercial "farms", which are despoiling both land and species, as historical and/or bucolic! You simply must stop this activity, and allow the land to be returned to the public as was intended and authorized under the law. Please adhere to your responsibility on this matter, and reverse current plans to expand these destructive practices! Do what you are charged to do under law!

Sincerely, Brenda Wallace

#7130

Name: Zambrano, Sierra

Correspondence: Public lands and native wildlife on Point Reyes National Seashore and Golden Gate National Recreation Area need to be conserved - not replaced with cattle and commercial agricultural expansion. I go to public lands to lose myself in the solitude of nature and renew my spirit by seeing native wildlife in their natural homes not to see denuded and overgrazed lands overrun with livestock.

#7131

Name: Runnion, Kathleen

Correspondence: The tule elk should not be killed for the sake of cattle ranching. Let the elk live their lives freely in their natural habitat within PRNS.

#7132

Name: VanderHoeven, Nakisha

Correspondence: I strongly urge the NPS to adopt Alternative F, to end ranching at Point Reyes National Seashore.

Cattle and for profit ranching and farming operations have no part in a nature reserve and are a detriment to the existing wildlife and the diversity of the natural area, and furthermore contribute to the destruction and pollution of the native habitat. I can visit anywhere to see cows, what I want to see is Elk and other wildlife in their natural habitat. Stop catering to a minority and listen to those who will use the land and appreciate it for what it is.

Thank you.

#7133

Name: Kingma, Kevin

Correspondence: I am submitting these comments on the Point Reyes National Seashore (PRNS) draft General Management Plan amendment and Environmental impact statement (GMPA-DEIS) on September 23, 2019.

Public Law 87-657 September 13, 1962 AN ACT To establish the Point Reyes National Seashore in the State of California. Be it enacted by the Senate and House of Representatives of the United States of America in Congress assembled. That in order to save and preserve, for purposes of public recreation, benefit, and inspiration, a portion of the diminishing seashore of the United States that remains undeveloped, the Secretary of the Interior (hereinafter referred to as the "Secretary") is hereby authorized to take appropriate action in the public interest toward the establishment of the national seashore set forth in section 2 of this Act



16 USC Sec. 459c 01/22/02 TITLE 16 - CONSERVATION CHAPTER 1 - NATIONAL PARKS, MILITARY PARKS, MONUMENTS, AND SEASHORES SUBCHAPTER LXIII - NATIONAL SEASHORE RECREATIONAL AREAS Sec. 459c. Point Reyes National Seashore; purposes; authorization for establishment - STATUTE In order to save and preserve, for purposes of public recreation, benefit, and inspiration, a portion of the diminishing seashore of the United States that remains undeveloped, the Secretary of the Interior (hereinafter referred to as the "Secretary") is authorized to take appropriate action in the public interest toward the establishment of the national seashore set forth in section 459c1 of this title.

I. These laws make it very clear that the Point Reyes National Seashore (PRNS) was created (1) for its undeveloped characteristics and (2) for the public interest.

Any of the 6 GMPA-DEIS alternatives that propose "Diversification" - - adding crops, pigs, sheep, goats and chickens would be adding further development. They would have further impacts on the PRNS. Therefore alternatives B, C, D, E would be illegal and should be disqualified.

The public interest: the public interest is the total public of the United States, not just a small group that makes money on public land. PRNS was created by a national law, not a local ordinance. Reading DEIS comments makes it clear there is a select local group with ties to the ranchers. Their comments are notable for being about their own personal self interest, not about the national public's interest. It is no coincidence that a local congressman Jared Huffman is leading efforts to make ranching at PRNS permanent and to remove anything that interferes with the local ranching business (eliminating native Tule elk).

There are similar examples of why federal law was enacted and enforcement needed to protect scenic undeveloped land for all the people of the US to enjoy: the creation of Yosemite National Park - - to remove local homesteaders and sheepherders from Yosemite Valley, and the Bundy ranch - thinking and grazing as if they owned the public's land in Nevada.

To repeat - PRNS was created for its undeveloped character and for all the public's interest. Alternative F is the only alternative that follows the law that created PRNS.

II. NPS economics: "More than \$11 billion of repairs or maintenance on roads, buildings, utility systems, and other structures and facilities across the National Park System has been postponed for more than a year due to budget constraints. Collectively they are known as "deferred maintenance." Addressing deferred maintenance is a critical focus area of our core mission to preserve parks" <https://www.nps.gov/subjects/infrastructure/deferred-maintenance.htm> I assume the NPS realizes and is committed to being stewards of all of the public's lands and that this requires careful stewardship of public money. PRNS internal memos indicate that monitoring the ranches for environmental damage and lease compliance already places outsized demands on the Seashore's budget. Alternative F would be the least costly alternative and would allow attending to deferred maintenance.

The NPS has already purchased all the ranches at PRNS in the 1960-70's at a cost of \$341 million (est. today's dollars). It was a give-away to allow past ranchers to graze on NPS land. It continues to be a taxpayer paid subsidy to the ranchers descendants - currently they pay \$7-9 per head AUM for grazing as compared to \$15-20 on private land in Marin county.

[https://www.nps.gov/pore/learn/management/upload/planning\\_ag\\_report\\_response\\_090724.pdf](https://www.nps.gov/pore/learn/management/upload/planning_ag_report_response_090724.pdf) They also do not pay any property tax on the land compared to Marin county ranchers - another subsidy. Alternative F is the only way to end the unfair give-aways at taxpayer expense.

Regards, Kevin Kingma

#7134

Name: N/A, N/A

Correspondence: 350 Bay Area is a grassroots environmental and Climate Justice non-profit organization working

for deep reductions in carbon emissions in the Bay Area and beyond. Founded in 2012, 350 Bay Area now represents more than 22,000 people primarily concentrated in the nine area counties.

350 Bay Area strongly urges the National Park Service to adopt alternative F and to reject alternative B. The ranches and dairy farms are the largest emitter of greenhouse gases in the National Seashore. In general, animal agriculture produces somewhere between 20% and 40% of the greenhouse gas effects contributing to our climate emergency. A National Seashore is a place to protect wildlife and ecosystems; it is completely inappropriate to lease National Seashore land to private ranchers for their profit-and in the process contribute to the destruction of the climate and the planet.

At the time the park was created, ranch owners received financial compensation and 25 year leases, so that there could be an orderly transition back to the native habitat. It is past time for the National Park Service to implement the intent of the National Seashores authorizing legislation and phase out the destructive effects of dairy and cattle ranching on more than one third of the park. 350 Bay Area strongly urges the Park service to implement alternative F and phase out ranching.

#7135

Name: N/A, N/A

Correspondence: As a member of the California-based international animal protection nonprofit organization In Defense of Animals with over 250,000 supporters, I oppose the National Park Service plan to kill native Tule elk, grow commercial crops, and permit ranchers to add chickens, turkeys, sheep, pigs, and goats to their exploitative operations. For this reason, I support Alternative F.

As national park land, this property was specifically set aside to protect, restore, and preserve the natural environment including the wild animals who live there. The original intention was to phase out dairy and cattle ranching, not add more crops or animals to increase ranching profits.

The proposed plan does not address the damage from grazing, including water-quality degradation and soil erosion. Also, adding new crops will create more conflicts with native wild animals.

Please abandon this inhumane and destructive plan by selecting Alternative F. I urge you to restore the Seashore's Pastoral Zone for wild animal habitat and repurpose historic ranch buildings for scientific research, interpretation, and public education.

#7136

Name: Bennett, Gordon

Correspondence: h h Save Our Seashore h h  
A 501(c)(3) Charitable Organization (EIN 94-3221625)  
Founded in 1993 to Protect Marin Countys Ocean, Coasts, Estuaries, Watersheds and Creeks  
40 Sunnyside Dr, Inverness, CA 94937 gbatmuirb@aol.com 415-663-1881

September 23, 2019

To: Cicely Muldoon, Superintendent, Point Reyes National Seashore (PRNS)  
National Park Service (NPS)

Re: PRNS General Management Plan Amendment (GMPA)  
Draft Environmental Impact Statement (dEIS)

Dear Superintendent:

Background: I represented Marin County on the GGNRA/Point Reyes federal Advisory Commission from 2000 until 2002, during which I successfully mediated disputes between GGNRA and Sausalito over Fort Baker and between PRNS and Bolinas over the Wilkins Ranch. I was a founding shareholder in Westbrae Natural Foods and have almost 20 years experience with food economics. I have also served on a number of environmental boards, including Marin Audubon and Marin Sierra Club. I have extensive volunteer experience with NPS and was the 2003 Volunteer of the Year for the National Marine Sanctuary Foundation. I now preside over Save Our Seashore (SOS) and support the PRNS Preferred Alternative B&subject to the following analysis and commentary, summarized below and as followed by detailed analysis.

Diversification: SOS supports the dEIS Diversification proposal but not justified as economic mitigation. We instead suggest that the dEIS consider diversification as mitigation for elk impacts, which would achieve a similar end. We also suggest that the dEIS consider where diversification could both be expanded and limited without altering the dEIS impact studies. We suggest that the dEIS consider that appraisals need to be strengthened in order to fairly compensate the public for use of its lands. We lastly suggest that the dEIS consider places where diversification text could be clarified and why transparency in appraisals would be helpful.

Elk Management: We support the dEIS proposal as consistent with elk management throughout National Parks and as needed to balance the NPS mandates for protection of both natural as well as cultural resources. We suggest that the dEIS consider additions to the Forage Model that may better clarify elk impacts on C Ranch and suggest that the dEIS consider additional forage offsets for C Ranch. Lastly, we suggest that the dEIS consider managing to the threshold of the impact of 120 elk rather than the number of 120 elk.

Best Management Practices/Mitigations: We support the dEIS list of mitigations, but we also suggest that the dEIS consider adding reasonable milestones. We further suggest that the dEIS consider transparency so the public can track the progress of mitigation projects.

Succession: We support the dEIS succession proposal as consistent with congressional intent, but also suggest the dEIS consider more specificity about NPS discretion over closed ranches.

Lease Template: We support the dEIS proposed Lease Template but also suggest that the dEIS consider adding prior health inspection observations. We further suggest that the dEIS consider the value of transparency re the annual meetings.

Public Use and Enjoyment: We support the dEIS proposals for use of abandoned buildings, but also suggest the dEIS consider better opportunities for ranch worker housing and affordable housing to offset visitor impacts. We support the dEIS proposal to open ranch roads to bicycles, but also suggest that the dEIS consider a commensurate reduction in less-used trails.

Thank you for the opportunity to comment, we hope you find our suggestions useful.

Sincerely,

Gordon Bennett, SOS President

ALTERNATIVE B: DIVERSIFICATION

DIVERSIFICATION: Rationale

The dEIS pg. 20 states the (sole) rationale for considering diversification as follows: Diversification of ranching activities allows ranchers to react to poor forage production years and fluctuations in the economic market (e.g., the price of cattle, grain, hay). SOS has expressed support for limited diversification, but not as justified in the dEIS.

First, multiple Department of Agriculture (USDA) programs already mitigate for poor forage production years and fluctuations in the economic market. Since 1995 (per the EWG website), the following non-exhaustive list of PRNS ranches have received such USDA subsidies: the Dan Evans Ranch, Mendoza Dairy, Stewart Ranch, David Evans Ranch, Nunes Dairy, Grossi Ranch, Spaletta Dairy, Kehoe Dairy, L Ranch Dairy, Lunny Ranch and the McClure Dairy. For example, the Nunes Ranch received nearly a half million dollars from eighteen different USDA programs. The existence of multiple USDA programs designed to mitigate for poor forage production years and fluctuations in the economic market undermines the rationale of the dEIS proposal that would duplicate the USDA economic mitigation by approving diversification.

Second, PRNS ranch families already have both potential and actual diversified income opportunities, including what appear to be extended family ranches in Marin and Sonoma (e.g. twelve Spaletta ranches relationship unknown but likely), second jobs by lessee family members and independent businesses owned by lessee family members, including, for example the Lunny family with a paving business, a compost business, a shellfish

growing/distributing business, and a quarry. The existence of these multiple opportunities for diversification undermines the rationale of the dEIS proposal that PRNS ranchlands should be a significant source of income diversification.

Third, nothing in the enabling legislation, related congressional testimony, or Salazar's directive specifically mentions diversification. On the contrary, the entirety of the record speaks to ranching and dairying being allowed to continue, with an occasional reference to agriculture as simply an abbreviation for ranching and dairying. Nevertheless, there are some who seek to re-interpret this occasional abbreviation to claim original intent for extensive agricultural diversifications based on everything that was grown, is rumored to have been grown, or could possibly in the future be grown in the dEIS planning area.

Such assertions have no merit and no relationship with ranching and dairying as practiced at the time these ranches were acquired by the NPS and when the original intent for continued ranching and dairying was discussed.

Last, we can find no reference in the National Environmental Quality Act (NEPA) that requires or allows mitigation of market impacts to NPS tenants/lessees. The purpose of NEPA is to assess the impacts of a project on the environment—not the impacts of the environment on the project. This rationale sets a precedent that could, for example, justify timbering a virgin forest in order to mitigate impacts on the logging company. SOS is concerned that the current dEIS rationale is subject to likely successful legal challenge, which would only prolong the uncertainties of this GMPA. For all of the above reasons, SOS suggests that the dEIS consider a more defensible justification for diversification that does not inadvertently undermine NEPA.

When the NPS purchased the ranches, the understanding was that the ranching families would be allowed to continue ranching subject to the NPS at its sole discretion managing (then-existing) wildlife impacts. But since those purchases, the NPS has introduced free-range Tule elk. According to the November 2017 CDFW Draft Elk Conservation and Management Plan, Conflicts between expanding elk and human populations are significant at some locales.

Thus it would seem reasonable for the NPS to mitigate elk impacts on PRNS ranches that were not anticipated in the original understanding. The dEIS (pg. 25) already acknowledges this rationale by its current actions to mitigate elk impacts, including providing pasture offsets, including identifying access to additional pasture for ranchers to offset forage lost to grazing elk. Thus we suggest that the dEIS consider amending its rationale for diversification as follows: Diversification of ranching activities allows ranchers another economic offset to impacts from elk to react to poor forage production years and fluctuations in the economic market (e.g., the price of cattle, grain, hay).

#### DIVERSIFICATION: Appraisal

In order to determine to what extent the dEIS diversification proposal represents a reasonable offset to elk impacts (as well as to determine an appropriate rent to PRNS for diversification operations), it will be necessary for PRNS to understand the economics of each diversification.

Under alternative B, NPS anticipates development of a master appraisal process managed by the US Department of the Interior to determine FMV for park ranch operations. Such a master appraisal process could be effective—provided it addresses the multiple problems with the prior appraisal process described by our 1/27/16 letter Appendix 6. But it seems clear that this master appraisal cannot determine FMV rents for diversification proposals yet to be made. Thus, case-by-case FMV appraisals will need to be made based on the specifics of each diversification proposal, as was done for the one existing (chicken) diversification operation. Our 1/27/16 letter pointed out that this former appraisal was deeply flawed, with a claimed FMV rent of only \$997 per year for a chicken operation with revenues estimated at \$143,258 per year (i.e. rent at 0.7% of sales vs PRNS grazing land rent at ~\$84AU/\$667=12.6% of gross sales). Unfortunately the current dEIS appraisal process for this same chicken operation is similarly deeply flawed, which points to the need for the dEIS to more clearly define (or significantly re-assess) how it intends to determine FMV for diversification operations.

Further, diversification needs to have enforceable and enforced limits so that it does not in any substantial way alter the historic ranching and dairying landscape or become a substitute for income from ranching and dairying. The dEIS sets explicit sideboards for diversification re the number of sheep, goats, chickens and acres of row crops, but sets no comparable limits on diversification income, without which diversification income could be so substantial that it could far exceed not just amounts needed for elk offsets, but could also exceed total ranch income.

We suggest that the dEIS consider limiting projected income from all diversification at the site to be at most a combined 10% of the projected income from ranching and dairying at the site (unless the rancher can document

the need for a greater offset for elk impacts). Such a 10% limit would also serve to quantify the dEIS language regarding small scale processing and would also likely be considered a de minimis departure from ranching and dairying as described in the enabling legislation, related congressional testimony, and Secretary Salazar's directive. Lastly, as an aside, the Marin County Crop Reports show that combined ranching and dairying income can fluctuate by 20%, so a 10% limit on diversification income intended to mitigate elk impacts would incidentally serve to flatten out those ups and downs. Thus we urge that the dEIS should consider how best to assess income from ranching operations, income from diversification operations and the appropriate rent for the diversification.

#### DIVERSIFICATION: Fixed Cash Rent

There are two common methods for agricultural landowners to assess rent for use of their land: fixed cash method and crop share method. The AU-based rent calculation for the current chicken operation represents (albeit poorly) the fixed cash method. If this AU method were to be carried forward for 18 chicken operations with 500 layers each, then that would result in a grand total of merely \$3,094 rent (0.64% of gross sales) for chicken operations grossing a combined \$481,950. This compares to the previous estimated rent percentage (12.6% of sales) for PRNS grazing land and standard crop share agreement that have rent at 25% of sales. In our opinion, such a fixed rent calculation for chickens based on AU would significantly short-change the public for use of its land and unnecessarily cripple PRNS in its ability to manage diversification activities and fund environmental protection. Assessing/monitoring for multiple diversifications almost certainly requires more effort and cost than for grazing land.

If the fixed cash method is used to determine diversification rent, then to avoid the problems in past and current FMV appraisals, it would seem necessary for industry specialists in each diversification type who could provide a fair estimate of both projected income and appropriate rent. The dEIS should consider the cost and complexity of multiple separate such appraisals.

#### DIVERSIFICATION: Crop Share Rent

Consequently, we urge the dEIS to consider the alternative, which is a crop share agreement that appears to be the easiest method to assess both income and the rent. A typical crop share agreement considers 25% as rent to the land owner and could generate as much as the dEIS socioeconomic estimate of total PRNS sales of \$16M x the suggested 10% diversification limit of 10% x the standard 25% crop share rent = \$400,000 in rental income for PRNS (vs ~\$480,000 in estimated rent from grazing). A 25% crop share agreement would help PRNS ranchers to offset elk impacts and also help PRNS by generating rental income that could go toward better monitoring, more effective management and additional environmental improvements.

A crop share agreement would also obviate the need for the specialized assessments of the fixed cash method because the rent would be assessed retroactively based on the rancher providing accurate sales records for the diversification (and ranching sales). Thus the dEIS should consider modeling such language requiring sales records on the similar language in Lease Template #7: Lessee shall provide all sales documentation to NPS upon request demonstrating that Lessee has an ownership interest in all cattle on the Premises.

Lastly, extreme care must be taken so that diversification operations allowed today do not become a new baseline against which new diversification proposals are measured tomorrow. To avoid such an outcome is why we suggest that the dEIS consider measuring diversification income against income from ranching and dairying so that the public can be certain that PRNS stays true to the original intent that ranching and dairying (rather than diversification) be allowed to continue as the principal use and be proportionate to estimated economic impacts from elk. The above suggested 10% limit could (if fully utilized on all PRNS ranches) generate as much as \$1.6M in gross sales for ranchers.

Further, elk impacts on the average ranch (with the exception of C Ranch) are not expected to exceed 10% of sales for the average ranch and thus the proposed 10% diversification income limit would seem to provide reasonably adequate mitigation for elk impact costs (see our Elk comment).

#### DIVERSIFICATION: Definitions

Consequently, we urge that the dEIS should consider making its programmatic policy clearer (example follows) when it describes allowed diversifications (pg. 37).

Diversification of ranching activities under alternative B could include new types of livestock, row crops, horse boarding that includes a public component, public-serving ranch tours and farm stays, small-scale processing of dairy products (e.g., cheese) produced on site, and sale of local agricultural products produced on site.

Diversification activities authorized in the Ranch Core subzone:

New Types of Livestock species (pigs, chickens, sheep, and goats)

Horse boarding activities that include a public component (riding/renting)

Row crops

Public-serving ranch activities that support park goals for interpretation and education (i.e., farm stays, ranch tours)

Small scale processing of dairy products from milk produced on site.

DIVERSIFICATION: Ranch Core Opportunities

There appear to be discrepancies between the Appendix As Alternative B Ranch Maps and the underlying leases on the PRNS website, which introduce confusion as to whether diversification limited to ranch cores would be allowed. For example, Figure 20 shows Home Ranch with a developed complex, but leases AGRI-8530-9007 and -1003 do not include this developed complex, and instead reference only incidental use of a ranch house. The dEIS should consider clarifying that AGRI-8530-9007 and -1003 will not be authorized for diversification that is limited to ranch cores (i.e. incidental use of a ranch house qualifies as neither a developed complex or a ranch core).

Figure 27 show the McIsaac/Cheda Ranch (Lease 8530-1000-9012) with 2 developed complexes, but the dEIS should consider clarifying that if a ranch has a developed complex ranch core, then the lessee will have one ranch core diversification opportunity, no matter how many ranches with ranch cores are in the name of that lessee. This same logic should apply throughout the dEIS, including but not limited to A and E Ranches (Leases 8530-2600-9002 and -9009) and the Percy Ranch (Lease 2600-10-1002).

A related issue concerns families with multiple ranches with ranch cores, at least one of which are in (or could be changed to) virtually the same, but not identical lessee names. Simply changing one name from a list of lessees on should not add a ranch core diversification opportunity. Thus the dEIS should consider making clear that when names on different leases that are substantially (>50%) the same and more than one of the leases has ranch core, then only one ranch core diversification opportunity will be allowed per family. For example, two ranches with ranch cores that are leased to same four lessees per the prior paragraph should have one ranch core diversification (e.g. 5 pigs) opportunity and changing one of the four lessee names on one ranch lease should not create a second diversification opportunity (i.e. 10 pigs).

DIVERSIFICATION: On-Site

Without such clarification re on-site origin, the dEIS could be interpreted to mean, for example, that milk could be trucked in from dairies outside PRNS for small scale processing&or that 18 farmers market could be established to sell local agricultural products from outside PRNS, We do not believe that any of these examples represent the intent of the dEIS, but we urge that the dEIS further clarify that intent.

We also note that first sentence of the above dEIS diversification references sale of local agricultural products but the bulleted list below of activities potentially authorized in the Ranch Core subzone does not reference sale of local agricultural products. We assume this to mean that the dEIS has reasonably concluded that the traffic, health- and- safety and liability impact of 18 farm stands (whether in ranch cores or roadsides) is unacceptable. Instead, we suggest that the dEIS consider expressly prohibiting such sales and instead expressly authorize sale of agricultural products produced on PRNS ranches at weekend seasonal farmers markets, e.g. in Point Reyes Station or in the visitor parking lot at Bear Valley or Drakes Beach.

DIVERSIFICATION: Horses

PRNS has had legacy horse boarding operations operating on public land that were de facto private facilities open only to family and friends with no public component. These operations have now or will soon end but the dEIS diversification proposal should not breathe new life into this legacy. The dEIS allows farm stays and ranch tours as diversification only when they support park goals for interpretation and education. A similar logic should apply to boarding private horses, so the dEIS should consider authorizing horse-boarding only when the boarding opportunity is open to the public and there are rental horses available so as to support park goals for recreation and public access. This is the same public component logic the GGRNA applied to the Golden Gate Dairys then private-only horse boarding.

The dEIS should also consider whether more publicly available horses on diversified ranches would materially impact existing public horse boarding/riding concessions in the Seashore and if so, should consider a cap on the

number of horses or operations that would be allowed as diversification.

#### DIVERSIFICATION: Row Crops

The dEIS also describes the 2.5 acres potentially authorized for diversification in potentially contradictory ways, so the dEIS should consider clarification. The predominate definition (emphasis ours) is per Page 37: Up to 2.5 acres of row crops not requiring irrigation would be allowed in previously disturbed areas in the Ranch Core subzone. However Pg. 51 reads differently: Ranch Core subzone: the developed complex of buildings and structures on each individual ranch including up to 2.5 additional acres of disturbed land immediately adjacent to the developed complex. Page 51 (and similar phrasings) should be corrected to conform to the Page 37 description of the 2.5 diversification acres as being within the ~10 acre Ranch Core, not 2.5 acres in addition to the ~10 acre Ranch Core.

Further, the dEIS does not make explicit the definition of its term row crop. This leaves open the possibility that any crop planted in a row is a row crop. We urge the dEIS to consider referencing the USDA California definition of a row crop that explicitly excludes a crop planted in rows. This would eliminate the previously cited extreme example cited of exotic mushrooms planted in rows and would also eliminate the growing 2 acres of livestock food.

Although this more explicit definition of row crop would also presumably eliminate the growing of grain that could be processed (by a small scale craft distillery) into whiskey for on-site bottle sales of agricultural products produced and processed on site, the dEIS should consider explicitly prohibiting crops grown for alcohol distillation. At the USDAs estimate of 34 bushels of rye per acre and two gallons of 190 proof whisky per bushel, then the 2 acres could produce 2,027 of 750ml-bottles of 80 proof whisky for sale. This is just another example of the Pandoras Box that diversification could open and why diversification needs to be carefully defined, monitored and limited. Cannabis is another crop now illegal on federal land, but perhaps not for long, so the dEIS should also consider explicitly prohibiting diversification into cannabis.

#### DIVERSIFICATION: Pasture / Chickens

The dEIS Alternative B (pg. 37) reads Diversification activities authorized in the Ranch Core and Pasture subzones are&Pasture subzone: Livestock species (sheep, goats, chickens). But there appear to be two separate issues here that have been rolled into one sentence. Sheep and goats are proposed to be eligible to be authorized in the pasture zone of all ranches, but chickens are proposed to be eligible to be authorized in the pasture zone of only the 18 ranches with a ranch core (dEIS pg. 187: if all 18 ranches that are eligible to raise chickens&).

The dEIS does not make clear the rationale for this distinction. Appendix D pg. D-48 states: Conduct daily inspections and quickly pick up livestock (i.e., sheep, goat, and hog) and fowl (i.e., chicken) carcasses& The requirement for daily inspections for sheep and goats is not a function of having a ranch core because they are authorized on pastures without a ranch core. Chicken huts need to be moved and inspected daily, so it is not clear why chickens are limited only to pastures with a ranch core. Further, if diversification is going to offset elk impacts, the handful of ranches without a ranch core could benefit from diversification into chickens just as much (if not more) than diversification into sheep and goats.

The dEIS also does not make clear the rationale for the 500 chicken limit. A 500 chicken cap produces wildly disproportionate income impacts: income from 500 chickens a small PRNS ranch would equal 100% the income from beef on that ranch, while income from the same 500 chickens on a PRNS dairy would represent less than 1% of dairy income. But, as we have suggested, income from diversification should remain supplemental to, not a replacement of income from ranching and dairying.

Further, chicken huts need to be moved daily so that the intensity of chicken manure can be spread rather than concentrated (dEIS pg. 187), so 500 chickens on a 100-acre PRNS ranch would appear to have 5 times the potential impact compared to the same 500 chickens on a 500-acre PRNS ranch. Further still free-range chicken and cattle are synergistic (chickens control bugs from cattle dung while fertilizing the soil for cattle forage). For all these reasons, we urge the dEIS to consider whether it would make better economic, elk offset and environmental sense to retain the dEIS-impact-analyzed 9000 total chickens but divide them among ranches in the same way that sheep and goats are allocated (as a percentage of AU vs the current 500 cap).

Using the AU adjustment suggested below for sheep and goats, the 2,400 beef AU plus the 3,130 dairy head (dEIS pg. 52) would represent an AU equivalent of 3,443 for all PRNS ranches combined. Dividing 9,000 chickens by 3,443 AU equals ~2.6 chickens per AU. Thus under this allocation logic, the smaller (40 AU) PRNS ranches could be authorized for ~100 chickens, while the larger (~285 AU) PRNS ranches could be authorized for ~750 chickens.

The dEIS also limits the number of chicken sheds to 3. The dEIS should consider whether limiting the height and color of the sheds could result in less visual impact than limiting the number. For laying hens, the existing chicken operation uses large plastic covered hoop sheds, with a peak that appears to be 10-12 feet high (broiler coops are only ~ 2 feet high). Other Marin pastured egg producers use old travel trailers with a height roughly the same. Fifty-four dilapidated aluminum-sided travel trailers scattered across PRNS pasture land could create 54 unnecessary visual impacts. Thus the dEIS should consider limiting the height of chicken huts to 6 feet (to allow walk-in egg collection) and limiting the colors to those beiges and greens that correspond to the pasture colors. Further because the dEIS (pg. 187) notes that chicken manure could adversely affect soil because of its high content of nutrients and heavy metals, and Moving chicken huts using motor vehicles could result in adverse effects& it would seem that, for example, six half-sized huts could be more easily moved by hand than 3 full-sized huts. Thus the dEIS should consider removing the limitation on the number of huts and adding a mitigation that requires any chicken hut on pasture to be moved only by hand and no less than once per day.

#### DIVERSIFICATION: Pigs

The dEIS puts a maximum limit on sheep (50) and goats (67), on chickens (500) and on row crops (2.5 acres), but there are no limits on the number of pigs that could be raised within each of the 18 ten-acre ranch core zones. Assuming 5 acres (1/2) of the ranch core could be devoted to pigs as a diversification, the number of feeder pigs per ranch could be as high as 250 with the total number on PRNS ranches at  $18 \times 250 = 4,500$  pigs. The dEIS should consider whether it is appropriate to set an expectation with ranchers and the public that the number of pigs allowed as diversification is limited only by available space in the ranch core and if that expectation is not appropriate, then establish a limit per below:

Our understanding (Point Reyes Rancher personal communication) is that pigs were historically used on PRNS ranches to consume both kitchen waste and agricultural waste (chiefly whey from cheese operations) and thus their numbers were de facto limited to a few pigs per ranch due to the limited amount of food available from on-site sources. Pigs also are escape artists that can root under standard fencing. Escaped pigs go rapidly feral and do great environmental damage&with a conservative annual estimate of \$1.5 billion in economic damage nationally to agriculture and the environment. Having as many as 250 feeder pigs in a ranch core would make containment difficult and the discovery of one missing pig out of 250 also more difficult. Thus the dEIS should consider prohibiting the importation of hog feed from off-site sources and limit on the number of allowed pigs to no more than five.

#### DIVERSIFICATION: Pasture / Sheep and Goats

The dEIS pg. 38 states: For individual ranches, grazing by sheep and goats in the Pasture subzone would not be allowed to exceed 10% of their authorized AU or 10 AU equivalents if the authorized AU is greater than 100 (whichever is less). But the problem with the way this limitation is stated is that most PRNS dairies do not have authorized AU&instead they have an authorized number of cattle. It should not be the intent of the dEIS to de facto prohibit dairies from diversifying with sheep or goats. Thus we urge the dEIS to consider how to apply the 10% AU concept that works for beef ranches also to dairy ranches. A rough method could be to consider that organic dairy cows must get a minimum ~1/3 of their dietary needs from in-ground forage, whereas beef cattle get closer to 100% of their needs from in-ground forage, thus 10% of authorized beef AU is approximately equal to 3.33% of authorized dairy head.

#### DIVERSIFICATION: Structures

Lastly, we urge that the dEIS consider requiring a bond to guarantee that any structure or alteration proposed to be built for use in any diversification operation will be removed and the area restored to its prior condition. We dont want a repeat of the Drakes Estero clean up that cost the NPS \$4M to remove nearly 1800 tons of mariculture debris.

#### DIVERSIFICATION: Transparency

The dEIS (pg. 37) states that proposed Alternative B fair market value (FMV) master appraisal process would allow for&more transparency regarding rental rates in the park. But the dEIS does not explain how that transparency would be achieved. We request that the dEIS commit to posting these appraisals on the PRNS website (with appropriate and necessary redactions). Prior leases gave only the lessee the right to challenge an appraisal. We request that the dEIS allow the public the same right as Lessees to review and challenge these appraisals.



We also urge that the dEIS consider ways to make sure that the master appraisal process fixes problems noted in our 1/27/16 letter (incorporated by reference), including (for structures) : Poor/Unidentified Comps; Special Lease Provision (Maintenance) Discount; Bulk Lease Provision Discount; Buildings claimed as Surplus to ranch use may not be surplus to residential or diversification use, Hay Barn Rent; and Buildings Not Used. Our 1/27/16 letter also identified problems in the former appraisals for grazing land, including Poor/Unidentified Comps; Distance from Petaluma Discount; Public Access Discount; Possessory Tax Discount; Chemical Restriction Discount; Limits on the Eradication of Non-Forage Ground Cover Discount; and Regulations on the Control of Predators Discount.

## ALTERNATIVE B: ELK MANAGEMENT

### ELK: Overview

According to the US Fish and Wildlife Service and the California Department of Fish and Wildlife (CDFW), November 2017 Draft Elk Conservation and Management Plan, Tule elk are neither threatened nor endangered. Elk populations are booming with 5,700 Tule elk and Conflicts between expanding elk and human populations [being] significant at some locales.

In the absence of natural predators, lethal management measures for ungulate populations are in widespread use both nationwide and in California . Consistent with the widespread use of lethal management, the NPS already stated in 1998 that it would use lethal means to manage the free-range elk herd .

Many of the public appear inconsistent in their belief that the NPS should not manage elk (a charismatic megafauna), but at the same time the public expresses no concern about NPS management of non-charismatic wildlife. But, in our opinion, the NPS must manage its wildlife based on science, rather than charisma .

Further, many of the public believe that the NPS is only responsible for protecting wildlife, but this belief is contradicted by the statutory requirement that the NPS must also protect cultural and recreational resources (without impairing natural resources). The public's confusion is understandable, given that most NPS-managed sites are either wildlife-oriented (Yosemite) or culturally-oriented (the Presidio), whereas PRNS is a blend. Thus, PRNS management of the Drakes herd to protect cultural resources (historic ranches) is consistent with both NPS management elsewhere and with other PRNS wildlife management efforts .

Some of the public have argued for the elimination of the ranches to benefit the elk while others have argued the opposite position for the elimination of the elk to benefit the ranches. But the dEIS states: NPS has set a population threshold of 120 adult elk [for the Drakes Beach herd]. This appears to be a reasonable compromise between these two opposite positions.

### ELK: Inconsistencies

The dEIS (pg. 24-25) describes a number of elk impact mitigations in Alternative A, including : Providing pasture offsets, including identifying access to additional pasture for ranchers to offset forage lost to grazing elk.

The dEIS (pg. 40) re Alternative B describes all the actions on pages 24-25, but omits Providing pasture offsets : NPS&would continue to take actions described for alternative A to reduce conflicts related to the presence of elk on ranches (e.g., hazing); mitigate elk damage to ranches; and conduct monitoring, disease testing, and reporting. The dEIS should consider making these two statements consistent by adding pasture offsets to the page 40 Alternative B description.

### Elk: Forage Model additions

To provide a more complete context within which to assess the proposed 120 elk, we urge the dEIS to consider breaking out components of the Appendix I Forage Model, which now does not quantify the amount of forage that disappears per the Appendix I references. Some of this forage disappearance is likely be due to life cycle of the forage plants themselves, but we believe another important component is the impact of multiple other forage-consuming wildlife, including deer, birds, gophers and rabbits. We believe it would help the public better understand elk impact on ranch forage if the elk impact was considered in the context of other wildlife impact on ranch forage.

We also suggest that the Forage Model could be a better predictor if it broke its current use of total annual rainfall data into at least two segments (early and late). The impact on forage of the timely rainfall can be more important than total annual rainfall.

### Elk: Impact of the 45 Roaming Limantour Bulls

The dEIS (pg. 81) states: Approximately 45 males spend time on ranch lands at any one time with most

concentrated use on Home Ranch, N Ranch, D. Rogers Ranch & Most males return to the wilderness areas & from summer into fall. According to PRNS wildlife biologist Dave Press (8/26/19 email): Tule elk at Drakes Beach are the equivalent 0.26 to 0.47 animal units based on the actual weights. Assuming the higher .47 AU for elk males, then those 45 roaming Limantour bulls represent  $21.15 \text{ AU} \times 9/12 \text{ months} = 15.86 \text{ AU}$  of forage consumed. We will use this figure in the subsequent analysis of the 45 Roaming Limantour Bulls.

The dEIS appendix K shows Home Ranch with 300AU, N Ranch with 90 AU and D, Rogers Ranch with 55 AU for a total of 445 AU. Assuming all the bulls were concentrated only on these three ranches, the AU impact would be roughly 3.6%.

However, we also believe it is useful to look at absolute economic impact in dollars in addition to looking at the forage impact in percentages. Using the dEIS estimate of \$1.6M in beef sales and 2400 beef, one head of beef represents \$667 in sales. Thus the estimated 15.85 AU of forage consumed by the roaming Limantour elk represents roughly \$10,567 in lost sales (3.6%) out of an estimated \$296,815 in estimate sales for these 3 ranches combined.

Thus, it would appear that the 10% limit on income from diversification (if fully implemented on these ranches) would more than suffice to mitigate for the lesser percentage elk impact on income.

Lastly, the dEIS (pg. 41) commits to maintaining this minor level of impact when it states: Elk from the Limantour herd would be allowed to wander & and they would be monitored closely and managed in consideration of ranch operations. Hazing and lethal removal may be used & to mitigate for impacts on ranching operations. Thus, for the 45 bulls, the dEIS appears to commit to maintaining an (un-quantified) level of ranch impact rather than a specific number of elk. Committing to a level of impact provides NPS with operational flexibility in managing elk.

For example, if all 45 roaming bulls began to concentrate only at the D. Rogers Ranch with its 55 authorized AU, then this might be determined to be an excessive 28.8% ( $15.86/55$ ) impact on forage and income and thus action might be taken to reduce the number of not-roaming elk on D, Roger Ranch below 45. Conversely if the 45 roaming bulls began to spread out evenly across all PRNS ranches (rather than just on Home, N and D. Rogers Ranches), then it is possible that more than 45 bulls could be allowed yet have the same minor level of impact per ranch.

Elk: the Drakes Beach Herd and C Ranch

The Forage Model (Appendix I) for C Ranch (the most impacted by elk) shows that the difference between 3 elk and 170 elk is the difference between an 81% chance of meeting the 1200 RDM vs a 75% chance & a seemingly trivial 7% difference. Thus it would appear that more than 120 elk could be supported on C Ranch without unduly impacting forage.

The dEIS references but does not quantify the non-forage impacts of elk on C Ranch (broken fences, pipes, injured cattle etc.), which the dEIS commits the Seashore to mitigate. We acknowledge that such mitigation would be facilitated if C Ranch would submit documentation of impacts, which to-date has been lacking. Lack of documentation allows stories of valid one-time/occasional impacts to be repeated, making it appear that the impacts are chronic. As most of the public who have insurance policies understand, insurance companies require extensive documentation before issuing reimbursement checks. PRNS, as custodians of the public's money, is no different, so it is not clear to us why the C Ranch operator would fail to document elk impacts in order to support the long-term viability of the ranch.

Regardless, it would be useful if the Forage Model disclosed more detail. Unfortunately although numerous percentages, numbers and durations are given on dEIS page 91 for the time males vs females spend in one place or the other and at one season or the other, the crucial question of how much forage these elk consume of C Ranch remains unclear in the dEIS, although it presumably is a specific value that is entered into the Forage Model.

Assuming the midpoint (of the Dave Press 8/26/19 email) of 0.365 AU for Drakes Beach elk, then that is an effective AU equivalent for the 120 Drakes Beach herd of  $0.365 \text{ AU} \times 120 \text{ elk} = 43.8 \text{ AU}$  of forage consumed. But that 43.8 AU is consumed on a combination of three different areas: C Ranch, E Ranch and unpermitted grazing areas. For purposes of this analysis we will assume that absent hazing, the elk would spend 1/3 of their time on the C Ranch portion of the three areas which would result in a forage impact on C-Ranch of 14.6 AU. Further, the dEIS (pg. 98) discusses the effect of hazing in some detail but again without disclosing the specific value that is entered into the Forage Model: During initial hazing efforts, the elk were hazed in the morning but often returned by evening. Through repeated efforts, hazing has been more effective at keeping elk away from C Ranch for longer periods. Hazing has not been very effective for bachelor groups. For purposes of this analysis we will assume hazing is 50% effective at reducing forage impacts on C Ranch, which results in a net forage impact on C Ranch of 7.3 AU. As we have stated re the usefulness of providing the impact of other wildlife on ranch forage,

we similarly believe it would help the public better understand the reasonableness of the calculated elk impact on C Ranch forage if the actual values entered into the Forage Model were disclosed. Absent this data, our net elk forage impact of 7.3 AU on C Ranch is necessarily rough.

We also note that the Forage Model incorporates the mitigating effect of hazing, but appears to ignore the 2003 pasture offset that also serves to mitigate elk impacts, as noted on dEIS page 25: Providing pasture offsets, including identifying access to additional pasture for ranchers to offset forage lost to grazing elk.

When D Ranch closed, the Drakes Beach herd had already established itself. D Ranch was ultimately divided between C Ranch, E Ranch and the Drakes Beach elk. As a result of this division, C Ranch got an additional 36 AU. The omission of this offset from the Forage Model demonstrates the same concern we expressed in our Diversification comment: Extreme care must be taken so that diversification operations allowed today do not become a new baseline against which new diversification proposals are measured tomorrow. In the case of elk at C Ranch, it appears that the pasture offsets made yesterday have become a new baseline against which elk impacts are measured today.

#### ELK: Dollar vs Forage Impact

Using the previously estimated 7.3 AU of forage consumed by the Drakes Beach herd, it would appear at first blush that the previously-added 36 AU for C Ranch cattle has already more than compensated for the forage consumed by 120 Drakes Beach elk on C Ranch. This may be why the Forage Model shows little impact difference between 3 elk and 170 elk. However, not all forage is created equal. Dairy cows need to be milked twice a day, so there is a limit to how far they can forage. The D Ranch Pasture A that was given as an offset appears to be at such a distance from the C Ranch milking barn that it is used only for heifers (that are not milked). Consequently, if the offset is 36 AU for un-milked heifers, while the elk impact is on the forage used for milk cows, the two situations are not the same.

Further, if the estimated 7.3 AU of forage consumed by the Drakes herd at C Ranch is translated into absolute dollars of economic impact (rather than forage percentage impact), the result appears different than the trivial result of the Forage Model. Because organic dairy cows must consume at least 1/3 of their forage from in-ground forage, the estimated 7.3 AU consumed by elk reduces dairy cow numbers by 21.9. Using the dEIS estimates of dairy cow income (\$14.4M) and dairy cow numbers (3,130), a dairy cow represents \$4,601 in sales and 21.9 less cows represents an income loss of \$100,754 to C ranch. Applying that \$4,601 figure to Appendix K (Table 3-1) figures showing C Ranch with 200 milk cows, 40 dry cows, 100 heifers, 2 bulls, then C ranch has an estimated total income of \$1,573,542 and the loss of \$100,754 represents roughly 6.4% of C Ranch income. Our estimates are rough, but they do appear to show that the dollar impact from elk on C Ranch may be more significant than the Forage Model appears to show.

Although it would appear that the 10% limit on income from diversification (if fully implemented on C Ranch) would more than suffice (as it did for the Roaming Limantour bulls) to mitigate the percentage of elk impact on income at C Ranch, we urge the dEIS to consider whether the estimated absolute dollar impact of \$100,754 may warrant additional forage offsets if the Drake Beach herd is to remain at 120. Added forage offsets would be consistent with dEIS page 25: Providing pasture offsets, including identifying access to additional pasture for ranchers to offset forage lost to grazing elk.

To this point of forage impact, there appears to be two anomalies in Appendix K Table 3-1 that could be usefully applied to C Ranch mitigations. As noted above, when D ranch was divided, E Ranch got Pastures B and C, which lease # AGRI-8350-2600-9013 states is for Grazing heifers on Pasture B at 72 Animal Unit's for 6 months per year (432 AUM's) and grazing beef cattle on Pasture C at 51 Animal Units for 6 months per year (306 AUM's), for a combined total of 738 AUM's annually. Thus this lease language shows  $738/12 = 61.5$  AU, not the 123 AU shown in Appendix K table 3-1, which appears to assume that the specified Animal Units are for 12 months instead of the actual 6 months. Thus the dEIS and Appendix K and L analyze the impacts of an overstated (by 61.5) number of cattle AU. Rather than correct this anomaly, it could better be used.

Table 3- 1 correctly shows A Ranch with 350 milk cows, 50 dry cows, 90 heifers, and 6 bulls permitted but only 200 milk cows, 45 dry cows, and 35 heifers actual. Consequently, there appears to be more than enough capacity at A Ranch itself to absorb the 61.5 AU from D Ranch's Pastures B and C, which are currently used by A Ranch and which we suggest could instead be used by C Ranch with no change in the number of AU studied by the dEIS. Thus in light of the growth of the Drakes Beach herd between 2003 and now, we urge the dEIS to re-consider the 2003 split of D Ranch and re-allocate its Pastures B and C to C Ranch. The additional 61.5 AU may not all be

useable for C Ranch due to the distance from the C Ranch milk barn, but at least part of Pasture B is west of Drakes Beach Road. Even if none of Pastures B and C can be used to supplement dairy forage, and all went to beef forage, the added 61.5 AU combined with the previous offset of 36 AU would represent roughly  $97.5 \times \$667 = \$65,033$  of added income to offset (~64.5%) the estimated \$100,754 in income lost to elk impacts.

We note that D Ranch was a closed ranch that before the 2003 division and was not part of A Ranch. We have suggested that moving forward, (see Succession comments) that the dEIS should make clearer that new operators of closed ranches will not have the expectation of succession or 20-year leases because closed ranches provide PRNS important opportunities to make adjustments in ranch management as new situations arise. The D Ranch is a perfect example of this need to make adjustments. Such a re-consideration of the 2003 D Ranch split would benefit ranching because it would mean no loss for A Ranch, yet also provide more pasture offset for C Ranch, which has been hardest hit by elk impacts and the most vocal in pressing for complete removal of the elk. Thus we would also argue that PRNS could make this change on a purely environmental basis in that it would relieve pressure on the elk and insure that elk and cows could co-exist.

#### ELK: Manage to Impact vs Number

Lastly, while we support the concept of the 120 elk threshold for the Drakes Beach herd as mitigated above, we also suggest that the dEIS consider maintaining the level of impact from 120 elk, rather than the specific number of 120 elk. As noted re the 45 bulls, committing to a level of impact provides the NPS with useful operational flexibility in managing elk.

#### ALTERNATIVE B: APPENDIX D BEST MANAGEMENT PRACTICES (BMPS)

##### BMPS: Milestones

One of the rationales for extending leases to 20 years (with succession) was to allow ranchers to recoup their investments in environmental mitigations. We understand that these mitigation funding is usually split between agency and rancher&is not 100% within the control of either party and thus occurs as funding, permits, and priorities dictate (Appendix pg. H-1). But the dEIS, as written, could result in conditions being in 20, 50 or 100 years exactly as they are now.

For example, Appendix L 8.2.2 notes: approximately 370 acres... includes resource protection exclusion areas to prevent cattle grazing along the Drakes Estero shoreline, including portions of Creamery Bay, Schooner Bay, and Home Bay. But there is no indication of what percentage of the Estero shoreline protection this represents&.and the maps (dEIS Figure 6) are at such a gross scale, with each ranch map at a different scale that it is impossible for the public to understand the proposal. Similarly, Appendix L 8.2.2 notes: In the Olema Creek watershed, new resource protection exclusion areas would restrict grazing from approximately 1.9 miles of riparian habitat&but no indication of the extent of this habitat, what percentage has been protected, what remains to be protected and what percentage the proposed 1.9 miles represents.

This contrasts with aborted 2010 GMPA Figure 24, which graphically represents the proportion of fenced vs unfenced creeks and pg. 307 that quantifies: &440 acres&of herbaceous wetlands are in areas&used for livestock... Thus we suggest that the dEIS should consider the importance of describing in both text and graphically each problem proposed to be mitigated, the percentage already mitigated and reasonable milestones by which the public should expect the remaining portion to be mitigated. The dEIS should also consider a webpage map to allow the public to see how the ranch zonings fit together, which may reveal other problems currently un-knowable. The dEIS should also consider posting mitigations on its website so the public can follow progress toward these milestones. For example, the dEIS should consider setting a goal that within 10 years, cattle will be fenced out of creeks, herbaceous wetlands and shorelines.

Various practices are listed to manage impacts from sacrifice areas (feed and watering sites), but nothing is said about minimizing sacrifice areas such that no bare ground is exposed. Thus the dEIS should consider setting a goal that within 5 years, sacrifice areas shall be minimized by rotating among several beef feed areas such that no feed area has exposed ground.

Appendix D pages D-10 to D-11 provide reasons that ranchers should install alternative water sources but do not encourage installation of a single such alternative water source. The dEIS should consider setting a goal that within 5 years, watering areas shall be interconnected and water piped among disparate troughs such that no watering area has exposed ground.

Appendix D page D-10 states: The area around the spring or seep would be fenced to control livestock access and improve habitat value. Nothing is said about ponds. The dEIS should consider setting a goal that within 5 years, spring and ponds shall be wildlife-friendly fenced at a minimum of 50 feet from the source in order to control livestock access and improve habitat.

Appendix page D-19 lists manure management actions that reduce greenhouse gas and California law (SB 1383) that targets a 40 percent reduction in methane emissions from 2013 dairy and livestock. The dEIS should consider setting a goal that within 10 years, dairies would convert to management methods that achieve a 40% reduction in greenhouse gas.

Appendix pg. H-2 defines: as Range subzone where Native grasses [are the] dominant species. Given that only 1% of Californias native grasslands remain and that 90% of the states threatened and endangered species are dependent on [these] grasslands, the dEIS should consider that native grass is a "keystone" species whose importance is not a function of being merely >50% in abundance or biomass (dominant) in a plot. Thus the dEIS should consider a much lower metric than 50%...for example, the ratio of the planning area dominated by native grass (9% per dEIS pg. 74). The dEIS should also consider proactive native grass restoration projects vs only reactive re-planting with native grass after a disturbance (Appendix pg. D-4).

Further, the dEIS should consider resolving the apparent conflict between Appendix L pg. 70 which states The zoning framework would specify that only grazing would be authorized in approximately 70% of the action area and the dEIS pg. 35, which notes that the 28,700 acre planning area (aka the action area) is divided into a Resources Protection Subzone of ~2,600 acres (where only prescriptive grazing would be allowed), plus a Range Subzone of ~16,900 acres and a Pasture Subzone of 9,000 acres in both of which grazing would be allowed. Thus dEIS would allow grazing in at least 91% of the action/planning area (not 70%).

BMPs: Guard Animals

Appendix D pg. 49 establishes criteria for guard animals (dogs, llamas, donkeys), to protect sheep, goats and chicken in the pasture zone. We suggest that the dEIS consider (in order to reduce impacts on hikers and wildlife) limiting these livestock species to fenced sub-pastures. Further, according to PRNS chicken ranchers, a herd-trained guard dog will react to a perceived threat by defensively positioning itself between the flock the threat. A perimeter-trained dog will aggressively confront the threat at the limit of the pasture. The dEIS should consider approving only herd-trained guard animals because no inadvertent hiker should be confronted by an aggressive guard animal defending the entire pasture though which the hiker may be passing. The dEIS should also consider adding that guard animals aggressively approach hikers must be removed permanently from the pasture. Lastly, it appears inconsistent for the dEIS on page 49 to allow dogs to haze wildlife to protect livestock, but on page 63 to prohibit dogs from hazing elk to protect livestock. Studies show the utility of dogs for this purpose. The dEIS should consider whether properly trained dogs under the management of trained on-site PRNS staff could assist in the effort to reduce elk impact.

BMPs: Compost

We suggest the dEIS consider amending pg. 126 (underlined below) to read: manure, compost and fertilizer spreading increases soil nutrients, which increases forage species production but may have adverse impacts on native grassland plant species. We also suggest that the dEIS consider amending pg. 35 to read: The Range subzone is identified as lands where grazing would be authorized, but more intensive activities would not be allowed because of the documented presence of sensitive resources, including native grassland species, rare plants, wetlands, riparian/stream/pond habitats, forested areas, and critical habitat&.

The spreading of compost on dairy pasture subzone (where no sensitive resources are known to occur), is both environmentally and agriculturally superior to spreading slurry, but this comparative benefit does not extend to rangelands. The dEIS correctly concludes that spreading compost on rangeland may have adverse impacts on native grassland plant species. But short-term species composition studies funded and promoted by compost advocates show little impact on native species, whereas species composition trends require long term analysis. As the California Native Plant Society 9/28/15 letter noted: critical questions must still be answered before Californians can be assured that the addition of compost will not adversely alter native species composition and structure of grassland habitats where the practice is applied. Further native grasses sequester far more carbon than the annuals. Thus we suggest the dEIS consider amending pg. 190 (Carbon Farming) to point out potential risks to native species and their carbon sequestration from application of compost to previously un-fertilized rangeland.

Not only does the dEIS (pg. 190) fail to point out the potential environmental risk of reduced native species due to the application of compost to rangeland but it also fails to point out the potential greenhouse gas risk from

increased forage species due to application of compost to rangeland. Studies funded and promoted by compost advocates (dEIS pg. 180 footnote) show increased carbon sequestration in the soil, but fail to account for the substantially greater GHS impacts of the increased enteric emissions in the atmosphere from the additional cattle able to be sustained on the land by the increases [in] forage species.

Instead, these studies claim that increased forage does not increase cattle numbers and only reduces the need for supplemental forage. That claim is likely true for dairy operations, where nitrogen from compost simply replaces nitrogen from slurry. But when compost is applied to previously un-fertilized rangeland in beef operations (emphasis ours) spreading the fertilizer over his land will eventually result in more forage, more beef and more profit. More beef creates more enteric methane, whose GHS impact is far greater than that of carbon.

Further, the benefit of carbon sequestration in the soil plateaus, but the greater GHS impacting methane emitted into the atmosphere by more beef continues indefinitely. Analysis by SOS indicate that the GHG benefit of carbon sequestered in the soil (by more compost) is surpassed within a few years by the more than offsetting impact of enteric methane (by more beef). Thus, the applying compost to rangelands not only risks impacts to native species but it increases (rather than decreases) greenhouse gas. Compost application to rangeland is thus an environmental expense that is coincidentally an economic benefit to the PRNS rancher who owns a composting facility and advocates spreading his product throughout PRNS rangeland.

#### ALTERNATIVE B: SUCCESSION

SOS supports the GMPAs draft Succession Policy (Policy) as consistent with long-standing Congressional intent, but the dEIS should consider making it clearer that under all circumstances when a ranch closes, the NPS will first determine whether it is still appropriate to maintain the lease/permit area in agriculture and if so to what extent and under what conditions. This is the same type of determination made for D Ranch and which resulted in some of the ranch (the steepest parts) being taken out of grazing for resource protection and the remaining (flat) parts being divided between nearby existing ranchers.

Thus, the continuation of the exact same prior grazing regime on a closed ranch newly offered to an existing PRNS rancher has not been and should not be automatic. Such closed ranches could be used to offset elk impacts, or to swap less environmentally valuable portions of that closed ranch with more environmentally valuable portions of an existing PRNS, or to spread existing AUs, or for short-term commercial grazing as a placeholder, or to experiment with prescribed grazing. The NPS should retain full discretion on these closed ranches without creating any false expectations of how they should be used, Thus the dEIS should consider making this important initial consideration about closed ranches clearer by transferring language now in Succession paragraph 2 to instead be in paragraph 1.

Further, the dEIS should consider that same offer proposed to be first extended to PRNS ranch lessees to take over the operation of a closed ranch, should (if no takers among lessees) then be offered to PRNS ranch workers. We point out that many of the PRNS ranch workers have a longer history working on PRNS ranches than younger lessees. Further, many current PRNS ranch lessees are themselves descendants of former tenant farmers who owned neither the land or the cows on what is now PRNS (Livingston: Ranching on the Point Reyes Peninsula). Before the NPS seeks RFPs, the NPS should consider offers from PRNS ranch workers.

Per above suggestions, see underline strikeout below.

The NPS would use the following process to maintain active ranch operations within the Ranchland Zone in a manner that supports park natural and cultural resource objectives.

1. In the event that named Lessees: (i) do not wish to enter into a lease/permit; (ii) cannot agree upon an arrangement among named lessees for continued operations under a new lease/permit, (iii) have not consistently met performance standards for the agricultural operation and other named Lessees are not willing to take on responsibility for improved operations; and NPS determines that it is appropriate to maintain the lease/permit area in agriculture (and if so, to what extent and under what conditions), the NPS would consider proposals from other leaseholders operating in the Ranchland Zone to continue ranch operations. In evaluating other park leaseholders, the NPS would assess proposed operations for consistency with the activities authorized as part of the final EIS and Record of Decision and past performance based on adherence to lease/permits and Ranch Operating Agreements.

2. In the event that no other park leaseholders are interested, and NPS determines that it is appropriate to maintain the lease/permit area in agriculture, the NPS would consider proposals from ranch workers on PRNS ranches to identify a new operator. In evaluating PRNS ranch workers, the NPS would assess work history on PRNS ranches and the criteria for review would be identified at that time.

3. 2. In the event that no park leaseholder or PRNS ranch workers are interested, the NPS would pursue issuance

of a request for proposals (RFP) to identify a new operator. The RFP process would be conducted consistent with NPS policy and regulations, and the criteria for review would be identified at that time.

The dEIS should also consider making clear that rancher operating under Reservations of Use and Occupancy (RUOs) will be offered leases (when their RUOs expire) subject to the same succession policy offered to current lessees. Conversely, the dEIS should also consider making clear that new operators of closed ranches (portions of which may be re-distributed to existing ranchers or to RFP awardees) do not qualify for the dEIS proposed on-going succession policy and such closed ranches will instead be managed on a case-by-case basis under conditions and terms wholly determined by the NPS.

#### ALTERNATIVE B: Lease Template

The dEIS should consider whether Agricultural Leases and associated documents should be a public document posted on the PRNS website with appropriate and necessary redactions. To that end, for example, the Lease Template paragraphs could be amended as follows (See underline strikeout below).

4.3 The Ranch Operating Agreement (ROA) shall be a public document posted on the PRNS website with appropriate and necessary redactions.

4.4 Minutes of the Annual meeting shall be a public document posted on the PRNS website with appropriate and necessary redactions.

The dEIS should also consider whether Agricultural Leases should include language to make lease conditions (including recommendations from Pacific West Regions Public Health Consultant) easier to monitor and enforce and to insure that diversification income is accessory to, not a replacement of, ranch income. To that end, for example, the Lease Template paragraph could be amended as follows.

7. &Lessee shall provide documentation to NPS upon request demonstrating that Lessee has an ownership interest in all cattle on the Premises. Lessees with diversification operations must provide annual sales information for both their beef/dairy operations and their diversification operations to NPS. Lessee is not permitted to allow use of the Premises for any cattle in which Lessee does not have an ownership interest. Cattle must be branded in a way that allows easy visual identification and Lessee shall include in this document (and thus make public) a copy or description of Lessees brand.

9. Except as authorized in the ROA, Lessee shall not engage in any Diversification Activities on the Premises, including in the Pasture and Ranch Core subzones. If Lessee seeks to undertake any Diversification Activities, Lessee shall follow the approval process set forth in Article 21. Lessee shall provide documentation to NPS upon request demonstrating that Lessee has an ownership interest in any other diversification activity authorized under the ROA. Lessee is not permitted to allow use of the Premises for any diversification activity in which Lessee does not have an ownership interest.

14.1. Wildlife management, including management of elk, removal of non-native species, and the restoration of native species, is the responsibility of the NPS. Lessee shall not engage in any activities that impact wildlife or that support or increase populations of non-native or invasive plant or animal species, Except as specifically for ranching, diversification, residential and maintenance activities authorized in the ROA, Lessee shall not engage in any other activities that impact wildlife or that support or increase populations of non-native or invasive plant or animal species.

18.3. If NPS authorizes Lessee to provide ranch worker housing, Lessee shall ensure, at its sole cost and expense, that such housing is safe, sanitary, and decent and that the physical condition of such housing complies with all Applicable Laws, including building codes. Lessee shall provide a copy to NPS of all health and safety inspections/reports received by Lessee, which, together with all such reports received by NPS, shall be a public document posted on the PRNS website with appropriate and necessary redactions. Lessee is also responsible for keeping exterior areas around such housing units clean and sightly.

19.4. Lessee shall maintain all water systems from the main line including the water meter, well pump and controls to the building(s) and outlying water spigots, water troughs, faucets, and stand pipes on the Premises. Lessee shall maintain water systems to show no evidence of leaks. Lessee shall also take all reasonable measures to conserve water through the use of water-restricting/low flow devices and low volume flush toilets. Lessee shall replace or repair any damage or loss to the water system within the Premises. Lessee shall prohibit livestock access within 100 feet of a water source used for human consumption. Lessee shall perform a Microscopic Particulate Analysis (MAP) on all water sources used for human consumption to determine if the source is under the direct influence

of surface water add if so, will filter the water.

The dEIS should also consider whether Agricultural Leases should include language to clarify maintenance responsibilities on ranch roads newly proposed for additional public access and recreational purposes . To that end, for example, the Lease Template paragraph could be amended as follows.

19.11. Lessee shall maintain ranch service roads on the Premises in a serviceable and safe condition regardless of whether the service road is also designated for public access. No new roads or truck trails shall be established without prior written permission of the Lessor. Mitigation measures and other conditions related to ranch service road maintenance activities approved by NPS will be included in the ROA.

## ALTERNATIVE B: PUBLIC USE AND ENJOYMENT

### PUBLIC USE AND ENJOYMENT: Vacant Structures

In order to better support ranching and ranch worker housing in PRNS, and to provide affordable housing for those in the local community displaced as long term residents by use of local housing as Airbnbs for park visitors, the dEIS (pg. 33) should consider altering the decision making sequence as follows (per underlined additions and struckout deleted sections:

When a contributing structure, structures or an entire ranch complex becomes vacant, NPS would use the following process to determine its future use:

" NPS would first consider if the structure or complex is needed and could be sufficiently used for NPS operational uses, such as housing, operations, visitor services, or partner use.

" If NPS does not have a use for the structure or complex, NPS will offer the structure or complex to both PRNS ranchers and PRNS ranch workers for ranch operations, rancher housing, or ranch worker housing. A vacant complex taken over by a PRNS rancher or PRNS ranch worker does not create a diversification opportunity in that complex or create any grazing opportunity in the surrounding ranchland, or any succession opportunity.

" If NPS a PRNS rancher or PRNS ranch worker does not have a use for the complex or structure, NPS may will issue a request for proposals, seeking proposals for adaptive reuse in ways compatible with park purpose and desired conditions, including use by a non-profit to provide affordable housing. Stabilization techniques such as mothballing structures may be implemented to arrest deterioration.

" NPS may also offer a complex or building to the rancher on the surrounding lands for ranch operations and/or rancher or ranch worker housing if the facilities could be sufficiently utilized&

" If ultimately no use can be found for the complex or structure, NPS would consider demolition of the complex or structures after consultation with the SHPO.

" Structures that are non-contributing to the National Register historic district may also be demolished after consultation with the SHPO.

The dEIS pg. 39 notes: Under alternative B, ranchers would continue to use residential units, barns, and other structures. Occupancy of residential units in the building complex would be limited to immediate family members of lease/permit holders, employees of that ranch (and their immediate family), and, with NPS approval, employees of other park ranches. However, we urge that the dEIS should instead consider whether use of residential structures in a ranch complex should be limited to that reasonably needed for ranch operation and intergenerational transfer.

We note that ranch families can be large and without this reasonable limitation, for example, a ranch owner with 4 married adult children each of whom has 4 married adult children could seek to occupy 21 residences, which would result in many members of that family commuting off-ranch to jobs while at the same time occupying on-ranch space that could house workers at PRNS ranches who would then have to commute from off-ranch sites to work on the ranch. Thus without this reasonable limitation, what the dEIS intends to be a ranch complex could turn instead into de facto family compound.

### PUBLIC USE AND ENJOYMENT: Visitor Access

According to Ranching on the Point Reyes Peninsula (pg. 48) the H Ranch Road is the historic Original Road from Olema to Point Reyes. We also request that the dEIS consider a walk-over or fat-man gate at the current vehicle gate on the road to H Ranch because this gate prevents hikers from experiencing this historic roadway The dEIS should also consider officially connecting this roadway to the trail to Muddy Hollow and including it on official trail maps. We know of no other historic roadway in PRNS that is similarly blocked to hiker access. Appendix E already plans to consider alignments around the core of Home Ranch and these could be designed to protect the



privacy of occupants and use of the ranch buildings while still allowing the experience of the historic roadway. Appendix E also suggests: Create a new trail alignment that highlights Drakes Estero. To that end, the dEIS should consider a trail to and interpretation of the site of the historic town of Point Reyes and its adjacent (former) wharf on Schooner Bay.

The dEIS should also consider adding new trails only when funding is also available for the de-commissioning of surplus trails and roads that do not meet sustainability standards. For example, Appendix E suggests new trails connecting the Bolinas Ridge Trail with Highway One, but the November 2003 Trail Inventory and Condition Assessment also recommends decommissioning existing trails (McCurdy) connecting the Bolinas Ridge Trail to Highway One.

In light of the new Interior Department directive to allow electric bikes with speed up to 28 mph on all roads/trails now authorized for bicycles and in light of the dEIS proposal to newly open certain ranch roads to bicycles, the dEIS should consider prohibiting bicycle use of former ranch roads that have devolved into de-facto single track trails (e.g. Abbotts Lagoon, Kehoe, Chimney Rock and Estero Trails). The dEIS should also consider metering out such new bicycle prohibitions commensurate with ranch roads newly opened to bicycles so that there will be no short-term diminution of bicycle opportunities and as more ranch roads are open, a possible long-term increase in bicycle opportunities.

In light of the continuing inability of PRNS to manage both official and un-official boat-in sites on its parklands along the east and west shores of Tomales Bay, the dEIS should consider whether PRNS should demonstrate effective management of these official and un-official existing boat-in sites before adding any new boat-in sites.

#### TYPOS:

##### Appendix L

8.1.4 (coho - species) text says "likely to adversely impact but Table 9.1 (line 1 col 4) also says "NLAA" and col 5 also says "unlikely."

8.2.4 (steelhead - species) says "likely to adversely impact and Table 9.1 (line 3 col 4) also says "LAA" but col 5 says "unlikely" (same as line 1).

Tables 7-2 and 7-3: Last columns refer to NMFS, but footnote c) refers to USFWS.

#### Lease Template

18.3: Lessee is also responsible for keeping exterior areas around such housing units clean and slightly sightly

#### END OF SAVE OUR SEASHORE PRNS GMPA DEIS COMMENTS

#7137

Name: Sackett, Nickolaus

Correspondence: Social Compassion in Legislation strongly opposes the expansion of cattle grazing in the Point Reyes National Seashore and the northern portion of Golden Gate National Recreation Area, and supports option F as described in the General Management Plan Amendment Draft Environmental Impact Statement.

The enabling legislation that Congressionally created these parks intended it for conservation and public recreation on the "diminishing seashores of the United States," with "maximum protection, restoration, and preservation of the natural environment within the area." Option F most closely aligns with that original intent, as well as being the option reflecting the need to protect our wild spaces for just that, the wild. If we are going to combat climate change we must scale back our animal agriculture, not expand it. Wild areas are under pressure from expanding human development and pollution. Social Compassion in Legislation and our members implore you to choose option F.

#7138

Name: N/A, N/A

Correspondence: I am writing to urge the National Park Service to discontinue the grazing of beef and dairy cattle

at Point Reyes National Seashore. This precious area has been damaged by livestock grazing which poses a threat to the environment and local wildlife and it should be protected and used to serve the public good, and not for the benefit of the livestock industry.

I strongly oppose Option B and any other proposal that would be fatal to Tule Elk or other wildlife to the benefit of ranching operations, and encourage the agency to adopt Option F to discontinue grazing and allow members of the public to enjoy this beautiful park and to be enriched with opportunities to visit and appreciate this special place.

#7139

Name: Donovan, Elizabeth

Correspondence: Please save the Tule Elk! The park is their home, not the ranchers. Given the current climate crisis, it's time for the ranchers to find a new gig. It's a scientific fact that cattle farming is destroying our lands and climate, and that consuming red meat is detrimental to humans and cows alike. Given the health conscious, educated, and enlightened citizens of California, we should be the standard bearers of promoting a plant based diet while promoting healthy activities, like hiking in our parks among the Tule Elk. If the cattle ranchers must continue to graze their cattle, they should find elsewhere to go.

Millions of people visit Northern California every year to see the majestic beauty of our parks. The Tule Elk are a key element to the beauty of Pt. Reyes.

Thank you!

#7140

Name: N/A, Stewart

Correspondence: Please let this park be only a park. This land is so beautiful and rare and the dairy farms mar and pollute the land. I think we can treat the farmers fairly and allow the public to have the wilderness they deserve.

Respectfully, Stewart

#7141

Name: CARDO, SHERI

Correspondence: As a longtime Petaluma resident who frequently hikes at Point Reyes National Seashore and has an immense appreciation for our "national park" and how it came into existence, I find the ongoing ranching there to be an ecological blight. The legislation clearly shows that ranching was never intended to exist in the park forever - the original ranchers were paid a considerable amount of taxpayer money for their land and given 25-year permits to phase out over time; those permits expired more than 20 years ago and the ranchers are still there. This is an abrogation of justice. Americans deserve better of their national lands.

I recently had the opportunity to kayak at Drakes Estero and was fascinated at how wild it is now that the oyster farm is gone. The Park Service did a great job of dismantling and cleaning up that area - truly, you'd never have known it was there. This is what I hope for the ranchlands, sooner rather than later.

These lands belong to the American people, this park is a National Park, and the ranches need to be returned to the wild. Environmentally and as a social justice issue, it is the only right thing to do.

#7142

Name: Lazzar, Patricia

Correspondence: Please do not legislate to kill or remove the TULE ELK from their natural habitat at Point Reyes

and DO NOT ALLOW the corporate AG people use the land and forest that is natural to the ELK and HORSES. Ranching is NOT the best use of the land ...THANK YOU. JUST SAY NO !

#7143

Name: CHRISTOPHER, LORI

Correspondence: I urge the National Park Service to adopt Alternative F, ending ranching in Point Reyes. I am quite disturbed to see the Park Service recommending an increase of ranching, and the recommendation that some of the Tule Elk be killed. This goes directly against the Park Service's stated mission of protecting natural resources. Cows are non-native and they are severely negatively impacting the land, native animals and ocean water quality in the Seashore. Tule Elk have always been native to this part of coastal California, and I'm one of thousands who come to hike the trails of Point Reyes every year hoping to see and photograph the elk. To this end my family and I have spent money taking interpretative classes, staying in local Point Reyes Station lodging and patronizing the shops and restaurants of Point Reyes Station and Inverness. We don't come to Point Reyes to see cows! We come to see and experience wildlife. The National Park Service's obligation to preserve historic and cultural resources can be achieved through interpretative displays of historic ranching. The cows in the National Seashore are not historic; the ranch buildings and infrastructure are. Some of the ranches clearly don't want visitors, as evidenced by No Trespassing signs. I urge the Park Service to focus on preserving and interpreting historic ranching buildings to show how ranches operated, instead of perpetuating the environmental damage that the ranches are causing. The NPS's mission doesn't include guaranteeing ranchers a living, and doesn't include allowing them to increase their operations on our public lands. There has been no discussion on how increasing ranching would impact the Seashore, and indeed no discussion of the serious negative impact to land and water from the livestock that are already at the Seashore. Further, the NPS has recommended increasing commercial ranching operations with no mind to impacts on the numerous native animals who inhabit the park. As someone who visits Point Reyes specifically to see wildlife, I'm very concerned about the negative impacts to native species from both existing ranching and the threat of increased ranching and other commercial operations. I am against the proposed changes to succession which would permanently commit the National Seashore lands to ranching. The Environmental Impact Statement discusses negative impacts of cattle grazing to native plants and animals, water pollution from cattle manure and greenhouse gasses from cattle ranching. Yet none of the proposed alternatives address mitigation efforts for the damage done over more than a century of cattle grazing. This is a gross oversight, and should be remedied. There should be discussion of costs and a timeline for mitigating the impacts of ranching to the Seashore. In sum, I strongly urge the National Park Service to uphold the stated values of protecting natural resources by selecting Alternative F, to end ranching at Point Reyes National Seashore. This is the best and clearest way of insuring that future generations of visitors will also be able to benefit from and enjoy a true wilderness experience with native wildlife.

#7144

Name: Garrett, Josh

Correspondence: Please don't destroy the beautiful elk herd to appease the cattle ranchers. Point Reyes is a true gem of the California coast and must be preserved and protected.

#7145

Name: Bartolini, Mark

Correspondence: I am submitting the following comment pertaining to the Draft Environmental Impact Statement (DEIS) and related documents for the General Management Plan Amendment process (GMPA) for the Point Reyes National Seashore (PRNS or Seashore).

Comment on the Foundation Document

I would like to begin by commenting on the Foundation Document. As a past Executive Director of the Point Reyes National Seashore Association (PRNSA), a native of Marin who began coming to the park with my mother

since the moment of its establishment in 1962 a 33-year full-time resident of the Seashore (Inverness Park) and as senior nonprofit and government official with a career dedicated to social justice issues related to climate change, I am familiar with the issues described in the Foundation Document. For the most part, I think the NPS did a good job in developing this- -but there are important missing or understated elements.

The first relates to the uniqueness of this park and its wilderness attributes being so close to a major metropolitan area of over 8 million people. In documents I have read about the aspirations of some park founders, it was clear that they saw this park as a unique opportunity to connect under-served communities with the fundamental attributes of a national park: solitude, beauty, abundant free-ranging wildlife, and relatively easy and free access. Unlike other National parks such as Yosemite or Yellowstone or Glacier Bay where travel distance, expensive accommodations, and entry fees put them out of reach of many individuals and families who simply don't have the financial resources to travel and overnight to these parks, Point Reyes can be relatively easily accessed to and fro in a day (including with public transportation) and has no entry fee. Building on this important detail of Point Reyes' accessibility for underserved communities, it cannot be overstated how important this park is for children from all Bay Area communities, including underserved communities. During my tenure as PRNSA's director, I oversaw the implementation of education programs at the park's Clem Miller Environmental Education Center. Up to 60% of children participating in these programs were from underserved communities who attended on scholarships procured by PRNSA staff. For some of these children, their attendance was transformational.

In an age when children are transfixed by technology and deeply concerned about climate change, the importance of experiencing nature is critical. Research on the developmental deficits suffered by children who are denied this experience (*Last Child in the Woods* is a seminal book on this topic) describes a "nature deficit disorder" that can impair children's social and academic developmental processes. In addition, the benefits of immersing one's self in nature as an aid in processing a range of psychological trauma and as a venue for inspiration has been extensively documented. While our National Park's are one of America's best ideas, they are, especially those that offer abundant wildlife, for many Americans physically or financially inaccessible. Point Reyes is a rare exception. And its physical and financial accessibility to the widest possible social strata of Bay Area residents should be incorporated as a foundational element to guide management decisions.

#### Comments on the DEIS

I am confused by the NPS designation of Option B as the preferred option. I believe there needs to be a justification section in the FEIS that describes what issues the park considered and how they weighted them to arrive at their final determination. The deficiencies I believe exist in the DEIS, and my confusion over the preferred alternative, are based on the following:

" The environmental assessments which cite significant negative impacts from ranching on the park's soil, water quality, native plants, visitor access and experience and wildlife, yet still allow for option B " The lack of any legal basis that would supersede the obligation of the NPS to comply with the Organic Act and its enabling legislation " The lack of a justification section that allows for the public to understand and comment on the particular factors the NPS considered and weighed in making its selection " The lack of critical baseline data, monitoring, evaluation, for introducing and managing additional commercial activities that will undoubtedly create new threats to the park's native wildlife from newly introduced non-native species. This constitutes insufficient mitigation measures as required by NEPA, to address adverse consequences. " The preference for continued commercial ranching versus a focus on its historic interpretive value to the park. " Per my comments on the Foundational Document, I believe the NPS has failed to appropriately weigh the value of a traditional national park experience (no fences, trails from Tomales Bay to the ocean no commercial activity beyond concessionaires, free-ranging native wildlife, no smell of manure or signs of commercial activity to provide an experience typically denied the underserved communities that were prioritized in the park's creation and remain of special concern to the NPS in part due to legal requirements such as the ADA. For instance, the enjoyment of the park by a person that is visually impaired may be even more impacted by the smell of manure and the sounds of heavy equipment. " The failure to cite, based on surveys commissioned by the Park's own nonprofit association (PRNSA), an

overwhelming public preference for protecting the parks natural resources, in particular its native wildlife, over commercial ranching operations.

" NPS, has disregarded both the letter and the spirit in the 1916 Organic Act, as well as Seashores own enabling legislation by dismissing their intent that natural resource protection goals (including native wildlife) and public use and enjoyment should shape the GMPA and that the preservation of cultural and historical aspects of the park should advance and not weaken the Seashore's overall purpose of natural resource protection and enhancement. Please explain why and under what authority?

" The DEIS makes it quite clear that option B would benefit a handful of commercial ranchers allowing them to increase their footprint in the park (with negative environmental impacts) so that they can improve their profit margins at the expense of resource protection and public use and enjoyment. " The DEIS fails to describe a baseline of how many coyotes, foxes, weasels, raccoons, marmots, bobcats, mountain lions elk, deer and other potential native predators and foragers that currently inhabit the park might be impacted by allowing diversification. Requiring cages and instituting a "no-kill" policy for predators does not ensure that impacts will not occur. How would the park know?

Moreover, as was demonstrated with the Tule Elk, the ranching community feels it is entitled to hire lobbyists to seek political support to ignore laws protecting natural resources when they have concerns that wildlife will negatively impact their bottom line. What legal justification does the park have for approving a whole new range of activities that could lead to similar responses to other wildlife/commercial activity conflicts? And on what basis is the park managing public lands based on the profitability of a commercial leaseholder rather than the organic act and its existing enabling legislation?

" The park has I believe appropriately protected several species from negative impacts including elephant seals (establishing restricted areas, allowing them to use whatever beaches they please and closing these to public access, no thought of culling when they do intrude on public areas), harbor seals (establishing a closure on Drakes Estero for pupping season) and snowy plovers establishing restricted areas during nesting season). What legal justification does the park rely on to apply a different standard for the protection, free-range restrictions and potential culling of Tule Elk in the park?

" And with respect to Plovers why does the park protect nests from human disturbance by visitors, but not address the impact of ranching activities, according to the DEIS attracting ravens, which heavily predate these nests?

While I am not suggesting that introducing children to ranches would have negative impacts, I do assert that there is a significant difference in viewing cows- -which are ubiquitous on Bay Area ranches, and native wildlife found in Point Reyes such as Tule Elk and Elephant Seals. Moreover, facing the ravages of climate change and biodiversity loss, children have a right and a need to experience such wild places. For many lower-income families, Point Reyes may offer their only National Park option.

Again, I raise these issues to question the weight being given to working ranches versus the importance of protecting and enhancing the natural attributes of the park including its wildlife, scenic beauty, auditory and olfactory sensations.

The impact of ranching on the visitor experience in Point Reyes

Commercial agricultural activities as practiced within the Point Reyes National Seashore include the grazing of over 6,00 beef and dairy cows, heavy equipment, plowed fields, cow excrement virtually everywhere in this zone, "poo ponds" where effluent is collected and then spread over fields giving off a noxious manure aroma, eroded landscapes, on-site storage of feed and manure, using tarpaulins and old tires, fields of white plastic calf huts, aluminum buildings, extensive fencing, loud, large and road-damaging commercial trucking, algae inundated water sources, impaired water bodies and an omnipresent smell of manure present a diminished national park

experience for visitors, by introducing sounds, smells and visual elements that are contrary to what one would experience in a national park that did not permit agriculture such as Yosemite or Yellowstone.

It does not have to be this way. Adopting option F would enhance the visitor experience and the welfare of the park's natural resources by allowing for hiking trails to run between Tomales Bay and ocean beaches, cleaner water, ocean vistas unimpaired by ranching heavy equipment trucking and fencing, free-ranging native wildlife including elk herds, greatly reduced erosion and the smell of ocean breezes and native plants rather than manure and methane emanating from cows. The Giacomini Wetland's restoration which the ranching community erroneously claimed would have major economic repercussions for ranching outside the park is a visible tribute to how these areas of the park could be restored.

Moreover, these sentiments are reflected in surveys PRNSA conducted to assess what visitors to the park most valued. Wildlife and natural resource protection was listed as the top priority by over 90% of respondents with ranching prioritized by below 30%. In the interest of transparency, the FEIS should include this public input.

These surveys correlate with my own experience over more than three decades of taking visitors out into the pastoral zone of the park. Their primary interest is seeing marine mammals, elk, coyotes bobcats and birds, the lighthouse, ocean vistas and beaches. They find it hard to understand how cows and commercial operations ended up in a national park. A Modified Option F

I urge the NPS to adopt option F to meet the legal requirements of the organic act and its enabling legislation. The reliance on a Congressional Resolution or a statement by a public official are not legally binding and should not be relied upon to support and expand ranching activities in the park. I would add one important addendum to F to at least mitigate the regrettable and divisive aspects of displacing ranchers and their workers. At the expiration of their leases and ranching activities, the park could establish concessionaire arrangements whereby they and employees could remain living in the buildings while offering fee-baed lodging and interpretative services to the public.

Finally, I offer my support for the plan to provide boat-in camping on Drake's Estero as it is consistent with NPS guidelines for enhancing visitor's experience and recreational opportunities. The park has a dearth of campgrounds, and such accommodation will allow public access to one of the most unique environments in the park.

Thank you for the opportunity to comment.

#7146

Name: N/A, N/A

Correspondence: In the preferred Alternative B, it appears that more weight is given to the value of cattle than to elk, which seems to be the opposite of what you would expect in a National Park. Since tule elk are the native species, it would seem that the number of cattle should be decreased rather than the number of elk to maintain the sizes of the respective herds at manageable levels. There are many opportunities to see cattle ranches in other areas. Tule elk are found in so few areas that keeping their numbers high enough to help increase the odds of wildlife encounters with the public would seem to be of a much greater public value than the chance to see more cattle. I doubt many people travel great distances to Point Reyes in the hopes of seeing a cow, while many come to see elk and other wild native species.

#7147

Name: Roach, Marti

Correspondence: we need to keep point reyes national seashore, first and foremost, a healthy, natural ecosystem. This enables other benefits for recreation and appreciation of the natural world, which we need in order to sustain

the health of our environment. I oppose Plan B which would negatively impact the natural features of Point Reyes in favor of agriculture. I believe that Plan F is a better approach.

#7148

Name: Timpone , Tracey

Correspondence: Remove the privately owned livestock (cattle) from this park and preserve the Native Elk that draw people to visit. I have been to this park a few times but won't return due to the cattle and their feces that are everywhere. Our Parks were created to protect and preserve nature. They should not be destroyed by welfare ranchers who are subsidized by the government. Ranchers need to keep their livy on their private land.

#7149

Name: ADAMS, Matt

Correspondence: Hi there, I'm writing to express my support o fthe improvements in public and bicycle access outlined under Alternatives B, C, D, E, and F. I currently ride occasionally in the Pt. Reyes area but there are not enough places to ride, especially when trying to plan nice loops or connect some areas to others.

I'm specifically in favor of the following potential projects:

A connection between Devil's Gulch and Platform Bridge Road using existing ranch roads.

A connection between Bolinas Ridge Trail at Olema Hill and Point Reyes Station to serve as an interim connection for the Cross Marin Trail.

A connection between Bolinas Ridge Trail and Five Brooks Stables using existing ranch roads.

A connection between Drakes Estero and Abbotts Lagoon Trail using existing ranch roads.

A connection between Marshall Beach Trailhead and Pierce Point Road using existing ranch roads.

An Estero Trail loop using existing ranch roads.

Many of these improvements would enable me to visit the Seashore by bike, rather than car. And I would feel much safer riding in Pt. Reyes National Seashore and surrounding areas on trails, pathways, and ranch roads, rather than on roads shared with fast-moving vehicular traffic.

#7150

Name: Chaney, James

Correspondence: These comments are submitted by Northwest Resource Information Center.

Since its inception in 1976 NRIC has been actively engaged in public land management issues, notably the adverse impacts of livestock grazing on public lands. NRIC has focused on how government has failed to mitigate or eliminate those adverse impacts, has imposed the cost of same on the public, and has conspired with private interests to, in effect, allow them to exercise de facto ownership of public lands.

All of these issues are manifest in the National Park Service's long-standing mismanagement of Point Reyes Seashore which is a nationally notorious betrayal of the public trust.

The NPS was sued because of its past mismanagement of the Seashore. It was forced to develop an environmental impact statement under the National Environmental Policy Act. Incredibly, all of the NPS alternative management

strategies except Alternative F would continue to violate the intent of Congress in establishing the seashore, violate the letter and intent of the contracts buying out private landholders, and continue to damage public values. In fact, all of the alternatives except Alternative F would make the situation worse than the status quo.

Incredibly, in its "preferred alternative" (B) the NPS proposes to offer what- -based on experience to date- -are in effect perpetual leases to anyone. And further, to allow the leasees to diversify their commercial operations, thereby increasing their sunk costs and their grip on public land, and further diminishing the public values the Seashore was established to protect.

It is long past time to stop subsidizing livestock grazing on the Seashore at public expense and stop putting non-Seashore livestock grazers at competitive disadvantage.

It is long past time for the NPS to at long last do what Congress intended in establishing the Seashore. Time to enforce the sweetheart deal the original landowners agreed to. Time to stop trying to fabricate alternative rationales for not doing either of those things.

Alternative F is the only legally and morally responsible path for NPS to follow, with the addition that current occupants of public lands within the Seashore should be proscribed from making any additional capital investments on public lands pending their evacuation.

Ed Chaney Director Northwest Resource Information Center 208.939.0714 [www.nwric.org](http://www.nwric.org)

#7151

Name: Singler, Robert

Correspondence: Cattle ranching should be on the ranchers private property, not on our public land. Save our precious land for future generations to behold !!!

#7152

Name: Walthall, Nicole

Correspondence: While the National Environmental Policy Act (NEPA), and its Environmental Impact Statement (EIS) requirements, do not dictate the outcome or direction of a final project, it is equally true that NEPA and the EIS process do not allow a federal agency to wholly abandon its legislative mandate and purpose by putting forth a preferred alternative that would exacerbate an already polluting, threatening, and dangerous use of public land inside a National Park. Here, the National Park Services preferred alternative of expanding ranching and dairy operations inside the Point Reyes National Seashore (PORE) while killing off Tule Elk to support the dairies and ranchers is as far from a legally supportable alternative as possible - - it would laughable, if it weren't such an arrogant political power grab by wealthy ranchers in one of the wealthiest counties in the United States, who have used their big dollars to corrupt US Senators and Representatives to do their bidding.

Alternative F is the only alternative fully supported by applicable federal laws and NPS policies. Each of the other alternatives violates the NPS Organic Act, 16 U.S.C. § 1 and the legislation creating PORE, 16 U.S.C. §§ 459c, and other applicable laws, including additional legal protections that mandate an even greater level of protection than the NPS laws, regulations, and policies alone. Important federal environmental laws, including the Endangered Species Act, the Marine Mammal Protection Act, the Clean Water Act, and the Wilderness Act, provide an overlay of protections that can strictly limit allowable uses of park lands. The NPS is legally obligated to apply these laws before permitting any special uses of park land.

The NPS derives its authority to authorize special uses on park lands through law and policy, some dating back to 1916:



[The National Park Service] shall promote and regulate the use of the Federal areas known as national parks, monuments, and reservations hereinafter specified . . . by such means and measures as conform to the fundamental purpose of the said parks, monuments, and reservations, which purpose is to conserve the scenery and the natural and historic objects and the wild life 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. (16 U.S.C. § 1)

The Seashore was created in 1962 to save and preserve, for the purposes of public recreation, benefit, and inspiration a portion of the nations diminishing seashore. 16 §U.S.C. § 459c. The Seashores 1962 authorizing legislation requires the Park Service to administer the Seashore without impairment of its natural values and in a manner that is supportive of the maximum protection, restoration, and preservation of the natural environment. 16 §U.S.C. §§ 459c6.

Statutory allowance of grazing and dairy farming inside the boundaries of PORE is not a green light to violate federal laws that protect water resources and national park resources. Statements by Congress in the Appropriations Act of 2019, even more so, do not magically erase enabling legislation and environmental laws. In fact, such "statements" reveal the hard push back on any actual lawmaking that would thwart the purpose and mandate of the National Park Service and the Point Reyes National Seashore.

All of these laws direct the NPS to Alternative F. It is time for the dairies and ranches, who have already been paid more than their fair value of buy-out money from federal funds, to be phased out. Killing native species to protect polluting practices that are already ongoing on 80% or more of West Marin private lands is unspeakable. No expansion of ranching activities - no more wildlife deaths, no more pollution.

Adopt Alternative F!

#7153

Name: Winslow, Kraemer

Correspondence: I am in SUPPORT of ranching/farming on Pt. Reyes National Seashore. I have been to several farms and have otherwise met many of the ranchers/farmers and am extremely impressed with the level of stewardship they show in taking care of the land. I also very much appreciate having the diversity of land use in our county. Further, I purchase food from many of the farmers and appreciate that in that way I am able to lower my carbon footprint.

Also, I have learned that one of the big objections of those who wish otherwise is not founded in fact - that the cows on the land cause more pollution. NOT SO. By using intelligent grazing methods, the cows aid in MORE carbon being stored in the ground. This is because of the increase in deep-rooted native grasses.

PLEASE do not change the beautiful system that we now have. It would be a tragedy to lose this beautiful diversity in our County.

Thank you in advance.

Kraemer Winslow

#7154

Name: Kwinter, Dave

Correspondence: I would rather see elk than cows at Point Reyes.

#7155

Name: Painter, Sigrid  
Correspondence: Dear Superintendent Muldoon,

As a longtime resident of Marin Co. my husband and I worked hard for the establishment of Pt. Reyes National Seashore at a time when developers had already started to build houses and tried to prevent public access to the beautiful beaches along the coast.

When the legislation was finally signed by President Kennedy in 1962 it stated clearly the intentions and purpose of Pt. Reyes: to save, preserve for recreation, benefit, and inspiration for the citizens of this country now and for future generations. Certainly the expectations among the public and, I dare say, the ranchers as well was that ranching would eventually be phased out. After all they sold us their land with the provision of leasing it back every five years for continued farming.

This original purpose and vision for Pt. Reyes should finally be implemented after almost 60 years!

I urge you to adopt Alternative F which comes closest to the legislation establishing the Park.

I strongly object to the expansion of any further agricultural activity, be it raising other farm animals, growing crops, or introducing more commercial activities of any kind. I want to point out that it is incredible to accept the idea that a herd of 180 Tule elk are a problem when over 5000 heads of cattle are tolerated even though they turned Pt. Reyes into one of the 10 most polluted fecal coliform areas in California!!

And this in a National Park?

It is a judgment against the stewardship of the farming community, and the Park Service quite obviously did not exercise sufficient oversight either.

This issue should be settled once and for all. Again I urge you to adopt Alternative F.

Sincerely,

Sigrid D. Painter, Ph.D.

#7156

Name: Ford, Patrick

Correspondence: I support Alternate F.

#7157

Name: N/A, N/A

Correspondence: The DEIS as currently drafted could violate the Congressional mandate that requires the Department of the Interior to administer its Point Reyes lands "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 USC Sec. 459c (6)(a)

Specifically, the DESI should not allow for diversification of ranching to include other businesses besides the historical ranching activities related to dairy and beef production, without a thorough analysis of the environmental impacts this would entail both through introduction of additional crops and animals to the Seashore, and through the additional tourist traffic it would bring. The roads in the Seashore are already in terrible condition and cannot support increased crowds, and the introduction of chickens, goats, etc will bring new conflicts with the wildlife.

In addition, business succession should be limited to multi-generational ranching families, consistent with the original intent of Congress, and not allow for competitive bidding open to the public.

#7158

Name: Thorsen, Diego  
Correspondence: kill em

#7159

Name: Lipari Maxson, Amanda  
Correspondence: I support option A, because the history of ranchers in Point Reyes is very strong, so the ranches should be allowed to stay, or (maybe begin to be phased out, if anything), however, the Tulle Elk in Pt Reyes are the only Tulle Elk in the world, and as such deserve to be preserved, seeing as humans put them in Pt Reyes in the first place.

#7160

Name: Michelotti, Erika  
Correspondence: The proposed plan is irresponsible and out of alignment with the mission of the parks to protect land for future generations. Please explain how the proposed option to allow ranchers in the park, who pay no property taxes and are granted below-market rents and discounted grazing fees, is in the economic interest of the park. Can you in good conscience permit this land use despite the current scientific literature that indicates the following: Two recent United Nations reports cite greenhouse gases and land conversion for cattle grazing as among the leading causes of two existential threats: the climate crisis and unprecedented species extinction. The reports call upon governments, industry and individuals to take action before it's too late. Native Tule elk here exist in no other national park. Once believed extinct, the reintroduction of the elk is a case study in species recovery. Yet, cows outnumber elk 10 to one at the seashore, and under the preferred alternative the elk that trespass on land leased for cattle will be shot. NPS says it will kill 10-15 elk annually to prevent "conflicts" and shore up ranchers' profits. The proposed action is managing the area for local audiences not as a national reserve. Please consider putting future generations first, addressing climate change, and acting as a national body by preserving this area rather than destroying it with cattle.

#7161

Name: Romano-Silverstein, Juliana  
Correspondence: I support option F because cattle ranching heavily disturbs the surrounding environment, and killing off the elk will only perpetuate the already existing harm done by cattle ranching. Killing the tule elk could motivate ranchers to want to kill other native wildlife that affects their ranching practices, which would consequently disturb that natural food web of the Point Reyes ecosystem.

#7162

Name: romanowski, christa  
Correspondence: Please consider my comments regarding changes to the management plan for Pt. Reyes National Seashore.

I urge you to implement only Alternative F: No ranching.

The presence of somewhere around 6000 dairy cattle (or any livestock, for that matter) degrades the land, air, and water of this NATIONAL SEASHORE! The EIS affirms this, stating that the presence of cattle harms the air, water, and wildlife of this public land.

The original agreements with the families of those who sold this land for the creation of the Park, have expired. I respect the hard work of family farmers, but this was the agreement. They ought to leave as their leases expire.

My husband and I have driven through some of the land utilized by the dairy farms...and it is an ugly wasteland. Bare, de-nuded of ground cover or vegetation, muddy, and manure everywhere. As taxpayers and citizens, I believe we should be able to enjoy our public lands without the presence, and destruction, caused by such commercial activity.

Please choose and act to protect this lovely coastal plain and seashore (increasingly "developed" in California) , its water, air, and the wildlife that calls it home. It is no place for these large dairy operations. Christa Romanowski

#7163

Name: Stott, Steven

Correspondence: In no way should wild species be eliminated or displaced to satiate profiteers in domestic cattle production. Bad idea...

#7164

Name: Nemec, Molly

Correspondence: Shooting wild animals in a National Park to raise cattle and other poor, farmed animals? THIS IS INSANE!

Not only should we as a nation be consuming less meat and dairy to combat climate change and prevent animal cruelty...and to improve our health, but letting ranchers use PUBLIC LAND, especially those in the billion-dollar farming industry who already take mega billions in bailouts and subsidies from our government???? This is just plain. wrong!!!

NO NO NO!!!!!!

#7165

Name: Harrington, Karen

Correspondence: I am urging the National Park Service to support alternative F and NOT B. Parks belong to the public not private interests.

#7166

Name: Kushner, Pinky

Correspondence: I am commenting on 4 topics, Cultural Landscape, Socioeconomics, Air Quality, and Visitor Use.

Cultural Landscape- - 1. The EIR needs to expand its conception of what is a cultural landscape. Times are changing. No longer is it appropriate to consider merely the use of, for instance, farming on close to 30,000 acres, as the only part of the cultural landscape. The cultural landscape is not 100 years or 150 years, but should include the cultural history of the landscape from ages ago. An appropriate expanded view of historical time will put cattle grazing into an appropriately small context. This miscalculation needs to be corrected in the EIR.

Socioeconomics- - 1. The EIR needs a more exact economic evaluation of the farming industry by comparing the income from agricultural leasing to the income from visitors to other California National Parks, specifically Muir Woods and Yosemite, two parks that are about 'nature' and have little emphasis on 'historic landscape.' That is, the economic success of these parks comes from the natural world rather than from historically recent cultural considerations. 2. Muir Woods and Yosemite have active conservancy programs with a virtual army of hundreds

of volunteers. The EIR should consider the economics of this essentially free labor should agricultural uses be removed from Pt. Reyes and its conservancy volunteers increase accordingly. 3. The EIR needs a more thorough investigation of what "entertains" visitors and consider that visitors are more interested in natural history than farming history. 4. The EIR evaluates the calculation of employment affects dependent on employment losses with the removal of grazing. It does not take into account, with credulity, the employment opportunities these 28,000 acres offer as a natural as opposed to agricultural landscape. The EIR needs to correct and expand its economic considerations.

Air Quality- - 1. The EIR makes little of the loss of vegetation due to grazing. There are no extensive calculations of CO2 capture of the natural landscape. Nor is there an honest comparison of CO2 capture in the degraded agricultural landscape compared to the natural landscape.

Visitor Use- - As stated above in my comments about socioeconomics, the visitors of today want birds, bees, and flowers, not cows. 1. The EIR numbers on this topic are not realistic and need to be recalculated with nature lovers in mind. The wildflowers in those Pt. Reyes lands that are not under agricultural use are spectacular and draw thousands and thousands of visitors in the spring even though the sights are few compared to some locations in California. 2. With the population base of the Bay Area, the numbers of visitors who could come to see the spring show has not been explored in depth. The EIR should correct this deficit by basing its calculations on those visitors to the Anza Borrego spring display, and increasing that number by factoring in the very near-by and very large population of the Bay Area.

#7167

Name: Boutwell, Daelan

Correspondence: I support option F because the ranches are taking the Tule elks habitat, they need to go

#7168

Name: N/A, N/A

Correspondence: A

#7169

Name: N/A, N/A

Correspondence: I support alternative A, because the Elk should be able to live freely, and the ranchers should have no say in the way that the wildlife of Point Reyes should live.

#7170

Name: Zucker, Isadora

Correspondence: I support alternative F because it will help to preserve the native Tule elk population. Along with this, getting rid of the ranches will be beneficial to the natural environment in the area and help reduce methane emissions from cattle.

#7171

Name: DeBaal, Karen

Correspondence: Do not kill tule elk. Get cows out of the park. Let the elk live. They belong there. Cows do not.

#7172

Name: Bronzo-Munich, Lucia

Correspondence: I am in support of option F, because this land should be for the national park and not for profit. Ranching deeply affects the environment and the Tule Elk help the ecosystem survive. Put nature first!

#7173

Name: Mchugh, Colin

Correspondence: A

#7174

Name: Mahl, Aidan

Correspondence: I support alternative F because the ranching in Point Reyes is not beneficial to the natural environment and native plant and animal species in and around the ranching zones. Additionally, cows have a large negative impact on the atmosphere as they produce large amounts of methane and should be removed so that the Tule elk can expand their population.

#7175

Name: N/A, N/A

Correspondence: Hello,

I want to start out by commenting on the comment process :)

I found it exclusionary, given that there's not enough time to read and understand all the documents in depth before one can make what you call a substantive comment. In my point of view, I don't need to be a scientist to have a fact-based opinion on the issue under consideration. I can learn the necessary facts from sources other than these documents, use them to inform my opinion, and then make a comment on this issue.

Now, regarding the issue, I am in favor of Alternative F. I would like ranching to be phased out, fences taken down for the elks to roam freely, and repurposing of Historic ranch buildings for operations other than ranching. Needless to say, I am vehemently against any diversification of the ranching operations.

National Park land is public land. I am not in favor of my hard-earned dollars to be steered towards private profits. National Parks are supposed to be a sanctuary for wildlife, esp. as rare as the Tule Elk. In 2018, there were 9.4 million dairy cows

([https://www.nass.usda.gov/Charts\\_and\\_Maps/Milk\\_Production\\_and\\_Milk\\_Cows/milkcows.php](https://www.nass.usda.gov/Charts_and_Maps/Milk_Production_and_Milk_Cows/milkcows.php)) in the US. As of 07/01/2019, there were 32.4 million beef cows

([https://www.nass.usda.gov/Charts\\_and\\_Maps/Cattle/jul\\_bcow.php](https://www.nass.usda.gov/Charts_and_Maps/Cattle/jul_bcow.php)). By contrast, the count of Tule Elk at the Point Reyes Seashore is less than 150! We don't need to further cull their population for more dairy and beef on the American dining tables.

I would also like to point out how this extensive dairy and beef farming impacts the environment:

1. To quote <https://news.un.org/en/story/2018/11/1025271>, "According to the World Economic Forum, the beef and dairy industry is responsible for more greenhouse gas emissions than the world's biggest oil companies, with the combined emissions of the top meat and dairy companies exceeding those of highly industrialized nations such as Germany or the UK."

2. Almost exactly a year ago, the United Nations dubbed meat as the world's most urgent problem: <https://www.unenvironment.org/news-and-stories/story/tackling-worlds-most-urgent-problem-meat>

3. Here's another article in Time calling on all of us to eat less meat: <https://time.com/5648082/un-climate-report-less-meat/>

I am disheartened to see that the National Park Service, who I deem as the protectors of the environment and wildlife, is further jeopardizing their safety to further private interests. I sincerely hope this comment helps you make the right choice for the environment and the dwindling Tule Elk populations.

Best.

#7176

Name: Westhead, Joey

Correspondence: I care about protecting California's wildlife. I oppose the National Park Service's plan to kill native Tule elk and expand commercial agriculture in Point Reyes National Seashore and Golden Gate National Recreation Area. I urge the National Park Service to instead restore the lands for wild animal habitat.

We should prioritize the preservation of our public lands and wildlife, not the economic interests of private ranchers. These commercial cattle ranches have serious negative environmental impacts on the park - polluting waterways, causing soil erosion, and harming the many endangered and threatened animals who live on Point Reyes. National parks exist to protect our natural resources and native wildlife. This park should be managed accordingly.

#7177

Name: Pelletier, Julia

Correspondence: The NPS should choose alternative A. The native species (Tule Elk) are important for promoting Point Reyes biodiversity and are accustomed to our environment. It's important to not disturb the peninsula food web, which could alter plant & animal levels and subsequently further decrease the elk population.

#7178

Name: Lundbaek, Anika

Correspondence: I support alternative F, which stands for no ranching, no renewed leases for ranching, and no shooting elk!!!

#7179

Name: N/A, N/A

Correspondence: I support Alternative A (no changes/taking no action). Tule Elk are extremely important to the ecosystem and shooting them is simply inhumane. They will not compete with the ranches as long as there are fences in place, and therefore it is drastic and unfair to consider killing the elk.

#7180

Name: Griffin, Zianah

Correspondence: Do not kill the Tule Elk, they are a unique and beautiful species that are native to California. They have been extinct from their native California areas and if they are not re-introduced their, than they should not be culled in Pt. Reyes. I know many community members who value the rare Tule Elk and go to Pt. Reyes specifically to sight them, my family included. If the elk are killed, many people will be upset and my family and friends with not continue to visit the beautiful Pt. Reyes area. I support option A, or option F.

#7181

Name: Taylor, TORY

Correspondence: As a life-long hunter and public lands conservationist, I strongly oppose your plan to kill the

Tule elk while allowing private cattle to destroy the Point Reyes National Seashore wildlife habitat. Please manage these public lands for native wildlife, not non-native cattle. Signed, Tory Taylor

#7182

Name: Frye, Apryl

Correspondence: I believe Point Reyes should chose option A, and not take action in shooting the Tule Elk, because we brought them to point reyes to protect them, and wouldn't make sense in shooting them and making them more endangered.

#7183

Name: davis, camille

Correspondence: I support alternative F because I feel it lets the elk live and we don't inter fear with them anymore then we already have.

#7184

Name: Feichtl, James

Correspondence: I love to visit Point Reyes to hike, camp and view wildlife. I don't visit to see cows. Point Reyes National Seashore is supposed to be managed under the Point Reyes Act for "maximum protection, restoration, and preservation of the natural environment." There's no mandate for prioritizing commercial agricultural leases on these public lands. Natural values, native wildlife, public access and enjoyment should take priority over commercial activities at Point Reyes. Tule elk are an important part of the landscape at Point Reyes. Their recovery is a result of successful native ecosystem restoration, which is a key element of the Park Service's mission. It's taken a lot of time, money and effort to restore tule elk to Point Reyes, the only national park where they live. Tule elk should be allowed to roam free and forage in the park - not shot, removed, fenced or treated as problem animals. Right now the Point Reyes ranches enjoy not only subsidized grazing fees and housing, but also taxpayer-funded infrastructure and road improvements, and publicly funded projects. But commercial activities at Point Reyes should be required to accommodate native wildlife - not the other way around. The Park Service shouldn't allow any new agricultural activities at Point Reyes. Planting artichokes or other row crops will attract birds. And introducing sheep, goats, pigs or chickens will attract native predators such as coyotes, bobcats and foxes. Expanded ranching would only create new wildlife conflicts. Cattle ranching should only be allowed if it's consistent with preserving the natural environment. And agricultural activities such as mowing shouldn't be allowed in park areas where they harm endangered species or wildlife habitat, impair water quality, cause excessive erosion or spread invasive plants/diseases. Cattle are the seashore's primary source of greenhouse gases. So the Park Service's preferred alternative is inconsistent with its own "Climate Friendly Parks" plan.

#7185

Name: Grady, Jasmine

Correspondence: hi, My name is Jasmine, I am a student at Drake Highschool, and I am part of an environmental science communitiy at my school. The concern of this comment is towards the news that Tule elk will be killed for the sole purpose of benefitting farmers and their income/farms. I am in support of option F. In our society, we need to understand the priority of the extinction of a species above a few farms. Farming should be cut completely because things can always be planted to grow in other places, but tule elk exist nowhere else, and they should not be killed for those purposes, but insted they should get even more room to grow and thrive as a population.

#7186

Name: Love, Natalie

Correspondence: I support option A because these are living creatures, and reproduction is normal. Killing an endangered species in inhumane and un nessasary



#7187

Name: Chaplin, Katherine

Correspondence: I think that elk are necessary for the ecosystem of the park but should not be brought because the population should not over populate ecosystem.

#7188

Name: Podboy, Ava

Correspondence: Hello, I am a junior at Sir Frances Drake high school, and I would like to express my opinion on the issues regarding Tule Elk. I'm in support of option F because it has the most benefits both for the animals, and for farmers and keeping healthy ecosystems. It's extremely important to preserve our native plants and increase biodiversity among the small percentage of land that hasn't been industrialized yet. Tule Elk play an immense role in this process because their ecosystem is dependant on them. Killing the Elk, and the land would have negative consequences on the land and animals/plant populations.

#7189

Name: Hernandez , Raymond

Correspondence: Alternative F: No Ranching is a great option Tule Elk are native and should be able to expand just like they a are supposed to.

#7190

Name: Shank, Marjorie

Correspondence: The Bike Coalition has much too much power in this county, they don't pay taxes and get whatever they want from the supervisors in return for votes. How many bikes have you ever seen on the expensive bike path in San Rafael? In Mill Valley they're just plain rude! If I see one one car lane turned into a bike lane in areas with heavy traffic and too many bike lanes already I'll scream!!!!!!!

#7191

Name: Cunningham, Laura

Correspondence: We are mailing in a hard copy pdf that shows photographs.

Western Watersheds Project

Laura Cunningham

California Director

Cima CA 92323

Mailing: PO Box 70

Beatty, NV 89003

tel: (775) 513-1280

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email: lcunningham@westernwatersheds.org

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GMP Amendment c/o Superintendent

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

Via US mail and web portal <https://parkplanning.nps.gov/document.cfm?documentID=97154>

September 23, 2019

RE: Draft Environmental Impact Statement for a General Management Plan Amendment, Point Reyes National Seashore and North District of Golden Gate National Recreation Area, Marin County, California

Dear Superintendent,

Western Watersheds Project, Resource Renewal Institute, Conservation Congress, Wilderness Watch, Sequoia ForestKeeper, ForElk, White Shark Video/Shame of Point Reyes, John Muir Project, Ban Single Use Plastics, Defense of Place, Ballona Institute, and the undersigned individuals (conservation organizations and individuals) submit these comments on the General Management Plan Amendment Draft Environmental Impact Statement (Draft EIS, or DEIS) for Point Reyes National Seashore (PRNS or National Seashore) and Golden Gate National Recreation Area (GGNRA) (collectively, the Parks), which addresses the future of 28,000 acres of park lands currently leased for 18 beef cattle ranches and 6 dairies.

Western Watersheds Project is a non-profit conservation organization with more than 9,500 members and supporters, many of whom reside in California. Our mission is to protect and restore western watersheds and wildlife through education, public policy initiatives and legal advocacy. Western Watersheds Project and its staff and members use and enjoy the public lands and their wildlife, cultural and natural resources for health, recreational, scientific, spiritual, educational, aesthetic, and other purposes.

Since 1985, Resource Renewal Institute has facilitated the creation, development, and implementation of practical strategies to solve environmental problems in a comprehensive framework. With over fifty years of experience in business, government, and nonprofit sectors, RRI founder Huey D. Johnson favors a diverse focus on many environmental issues.

The Conservation Congress is a grassroots 501(c)3 nonprofit conservation organization incorporated in the state of California in 2004. We work to protect National Forest lands and native wildlife in northern California. The Conservation Congress is part of Voices for Public Lands (VPL), an informal coalition of public lands conservation groups united by a commitment to the values enumerated in VPL's Declaration of Principles for Public Lands. We believe these public lands that are owned by the American people and paid for with taxpayer dollars should have a strong public voice. Therefore, Conservation Congress especially provides a voice for the voiceless - the wildlife, trees, water and the interconnected ecosystems that cannot speak for themselves.

Wilderness Watch is the leading national organization whose sole focus is the preservation and proper stewardship of lands and rivers included in the National Wilderness Preservation System (NWPS). The organization grew out of the concern that while much emphasis is being placed on adding new areas to these systems, the conditions of existing Wilderness and rivers are largely being ignored. We believe that the stewardship of these remarkable wild places must be assured through independent citizen oversight, education, and the continual monitoring of federal management activities. Wilderness Watch is committed to citizen oversight, public education and when necessary, legal and legislative action, to protect Americas finest environmental

legacy for present and future generations.

Sequoia ForestKeepers (SFK) mission is to protect and restore the ecosystems of the southern Sierra Nevada - including both Sequoia National Forest and the Giant Sequoia National Monument - through monitoring forest conditions, awareness of laws, education, and litigation. By acting as the eyes, ears, and voice of the forest, SFK seeks to improve land management practices, to promote land stewardship, to enforce existing laws and regulations, to implement public awareness programs, to offer assistance to local land management agencies, and to save natural forest ecosystems.

For Elk is a volunteer grassroots organization organizing to save the tule elk of Point Reyes National Seashore.

White Shark Video/Shame of Point Reyes is a documentary project on Point Reyes National Seashore by independent film-maker Skyler Thomas.

John Muir Project of Earth Island Institute is dedicated to the ecological management of our federal public forestlands. Our goal is to ensure that these lands are managed to provide optimal ecological conditions to support and restore the full complement of native biodiversity in these forest ecosystems, which have been severely degraded and damaged by decades of commercial logging and suppression of wildland fires.

Many individuals who value Point Reyes National Seashore, Golden Gate National Recreation Area, the tule elk, native wildlife, and our public lands, helped us with these comments by collecting information and photographs, and offering their expert advice.

I, Laura Cunningham, am a biologist specializing in historical ecology and native California grasslands, and so I have a keen interest in protecting and restoring the coastal prairies and other native plant communities in the planning area. I have made three extensive field visits to the ranching area in 2018 and 2019, so I have personal knowledge of the area. I participated in the previous steps in this planning process by sending in scoping comments to the EIS. I have read the entire DEIS, as well as other related documents such as the 2019 Grazing Plan and the 2019 Natural Resources Condition Assessment.

We would also point out that the manner in which public comments are allowed to be sent to NPS for this project are unusually restrictive in our experience with federal agency public lands projects. Form letter comments that include individual names and often also additional hand-written comments are not accepted, even when hand-written sentences are added to a form. Hundreds of public comments have thus been rejected.

In addition, the clunky comment form window removes formatting of comment documents and also deletes footnotes. Therefore, we are adding footnotes parenthetically into the main body of the text. NPS should accept emails with attachments, as well as accept and at least count form comments, in order to fully involve the public as required by the National Environmental Policy Act.

These are the major items we will be covering in our comment letter:

I. The Draft General Management Plans Preferred Alternative Violates the National Park Service Organic Act, the Enabling Legislation for PRNS and GCNRA, and the National Park Service Management Policies and Regulations.

National Park Service Organic Act 16 U.S.C. 1.

16 U.S. Code /459c. Point Reyes National Seashore; purposes; authorization for establishment.

16 U.S. Code Subchapter LXXXVI-Golden Gate National Recreation Area Establishment.

NPS Management Policies.

National Historic Preservation Act

- A. Ongoing Impairment of Native Coastal Prairies
- B. Ongoing Impairment to Native Wildlife and Habitats.

## II. The Preferred Alternative and the Draft EIS Violate the National Environmental Policy Act.

- A. The Purpose and Need Is Impermissibly Narrow and Inconsistent With NPS Purposes and Goals.
- B. The Draft EIS Is Too Broad and Vague In Its Analysis.
- C. The Draft EIS Fails to Analyze and Disclose the Effects of Foreseeable Future Actions Because It Defers the Relevant Management Plans to an Unspecified Future Process.
- D. The Draft EIS Fails to Take a Hard Look at the Issues with Manure Management and Fecal Contamination Leading to Impairment of Natural Resources.
- E. The Draft EIS Contains an Inadequate Range of Alternatives.
- F. The Draft EIS Fails to Take a Hard Look at the Ecological Benefits of Reintroduction of Native Predators.
- G. The Draft EIS Fails to Adequately Assess and Disclose the Baseline Conditions of the Project Area.
- H. The Draft EIS Fails to Take a Hard Look at the Impacts of Proposed Ranching Alternatives on Wildlife.
- I. The DEIS fails to Take a Hard Look at the Impacts of Proposed Ranching Alternatives on Mammals.
- J. The DEIS fails to take a hard look at the Impacts of Proposed Ranching Alternatives on Birds.
- K. The DEIS Fails to Take a Hard Look at Impacts of Proposed Ranching Alternatives on Amphibians.
- L. The DEIS Fails to Take a Hard Look at Impacts of Proposed Ranching Alternatives on Salmonids.
- M. The DEIS Fails to Take a Hard Look at Impacts of Proposed Ranching Alternatives on Invertebrates.
- N. Significant Impacts to Water Quality and Water Bodies Are Not Fully Analyzed.
- O. Important Proposed Policies Were Not Given Their Due 'Hard Look Under NEPA.
- P. The DEIS Fails to Take a Hard Look at Impacts to Public Recreation and Inspiration.
- Q. The DEIS Fails to Take a Hard Look at Impacts to Wilderness.

## III. The Definition of National Historic Places is Too Narrow Under NHPA.

## IV. Conclusion.

We support Alternative F, including the permanent removal of beef and dairy ranching from Point Reyes National Seashore (PRNS), dismantling of all internal fences (including the Tomales Point enclosure fence), and allowing the natural expansion of free-ranging tule elk herds to fill all available habitat on PRNS and Golden Gate National Recreation Area (GGNRA). In addition, the General Management Plan should include restoration of native coastal prairie and other native vegetation types, and elimination of non-native weeds. Current management allows the planting of non-native vegetation (DEIS at 22), and this is unacceptable on a National Park Service (NPS) unit whether for silage production, site restoration, or any other purpose.

The ranches occupy nearly a quarter of the park lands, yet the intent behind the creation of the parks was never to support private ranching activities in perpetuity. In the 1960s and 70s, the federal government, through the American taxpayers, paid ranch owners over \$57 million to purchase the ranches, for the benefit and enjoyment of the public and protection of natural resources. There is simply no proof Congress intended in 1962 that ranching would go on forever.

The 1978 amendment to the enabling legislation by Congress provided that the Secretary could lease for ranching where appropriate in his discretion, after the 25 years or life estate, as long as the ranches do not impair resources. The 1978 reservation language applied to ranchers and homeowners. But the 1978 language makes it very clear that any leasing to a rancher is conditional on there being no impairment of natural resources.

Such lease shall be subject to restrictive covenants& (16 U.S.C. Sec. 318b)

In our scoping comments of November 29, 2018 (attached hereto: Western Watersheds Project et al. 2018, Attachment 27), and as detailed in these comments to the Draft EIS, we have provided the Park Service with

numerous examples of impairment, both in the past (from Freedom of Information Act documents), in the last few years, and ongoing. All of the filings from the complaint filed February 10, 2016 (Resource Renewal Institute, Center for Biological Diversity, and Western Watersheds Project v. National Park Service), which are in NPS possession already and should be part of the record for this plan. The ongoing grazing at Point Reyes National Seashore and Golden Gate National Recreation Area ranches violates any restrictive covenants and ranching is obviously not appropriate in National Park Service lands where impairment of natural resources, degradation of cultural resources, and even the health of visitors is put at risk by poor water quality. Therefore, the NPS must make Alternative F its management plan for the planning area in order to protect and restore these park resources.

We object to the preferred alternative for the following reasons:

I. The Draft General Management Plans Preferred Alternative Violates the National Park Service Organic Act, the Legislation for PRNS and GCNRA, and the National Park Service Management Policies and Regulations.

National Park Service Organic Act 16 U.S.C. 1.

All plans and management actions approved by the National Park Service (Park Service or NPS) must comply with the agency's Organic Act, as amended. This legislation states,

[The National Park Service] shall promote and regulate the use of the Federal areas known as National Parks, monuments, and reservations hereinafter specified & by such means and measures as conform to the fundamental purpose of the said parks, monuments, and reservations, which purpose is to conserve the scenery and the natural and historic objects and the wild life 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.

16 U.S.C. 1.

The Organic Act mandates that NPS provide the highest level of protection: to leave park resources unimpaired for future generations. 54 U.S.C. 100101 (originally codified at 16 U.S.C. 1). This is distinctly different from the "multiple use" missions and mandates of other federal land management agencies,

Furthermore,

Congress further reaffirms, declares, and directs that the promotion and regulation of the various areas of the National Park System, as defined in section 1c of this title, shall be consistent with and founded in the purpose established by section 1 of this title [the Organic Act provision quoted above], to the common benefit of all the people of the United States. The authorization of activities shall be construed and the protection, management, and administration of these areas shall be conducted in light of the high public value and integrity of the National Park System and shall not be exercised in derogation of the values and purposes for which these various areas have been established, except as may have been or shall be directly and specifically provided by Congress.

16 USC 1a-1.

The NPS has a narrow mandate "...to conserve the scenery and the natural and historic objects and the 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." (1916 Organic Act, 16 USC 1).

In this National Park Service founding statute, it is made clear: "&no natural curiosities, wonders, or objects of interest shall be leased, rented, or granted to anyone on such terms as to interfere with free access to them by the public: Provided, however, That the Secretary of the Interior may, under such rules and regulations and on such terms as he may prescribe, grant the privilege to graze livestock within any National Park, monument, or reservation herein referred to when in his judgment such use is not detrimental to the primary purpose for which

such park, monument, or reservation was created& (1916 Organic Act, 16 USC 3. Emphasis added).

A significant amendment to the Organic Act is the 1978 Redwoods National Park Expansion Act. The Redwoods Act amendments, which expanded Redwood National Park to address the impacts of resources from logging outside the park, also amended the Organic Act. The amended provision states that all park management activities shall be:

[C]onducted in light of the high public value and integrity of the National Park System and not be exercised in derogation of the values and purposes for which these various areas have been established, except as may have been or shall be directly and specifically provided by Congress.

Pub. L. 95-250, Title I, 101(b), Mar. 27, 1978, 92 Stat. 166 (amending 16 U.S.C. 1a-1).

This amendment reaffirms the mandate set forth in the Organic Act and directs the National Park Service to manage park lands in a manner that would not degrade park values.

Congress reaffirmed the Organic Act's non-impairment mandate through enactment of the NPS Act in 2014. 54 U.S.C. 100101(a).

16 U.S. Code /459c. Point Reyes National Seashore; purposes; authorization for establishment

The legislation that established PRNS provides, in pertinent part, as follows:

459c-6. Administration of property

(a) Protection, restoration, and preservation of natural environment

Except as otherwise provided in sections 459c to 459c-7 . . . the property . . . shall be administered by the Secretary without impairment of its natural values, in a manner which provides for such recreational, educational, historic preservation, interpretation, and scientific research opportunities as are consistent with . . . the maximum protection, restoration, and preservation of the natural environment within the area . . .

16 U.S.C. 459c-6 (emphasis added).

This makes clear that, like the Organic Act, the Park Service is required to manage the Seashore in such a way as to not cause impairment of its natural values. The law goes on to state that even traditional uses of national parks, such as recreational, educational, historic preservation, interpretation, and scientific research opportunities are allowable [only] to the extent consistent with . . . the maximum protection, restoration, and preservation of the natural environment within the area . . . (Id.). The highest priority is to not impair natural values. Recreation, education, historic preservation, etc. are all subject to that highest priority, not equal to it.

16 U.S. Code Subchapter LXXXVI-Golden Gate National Recreation Area Establishment.

The GGNRA legislation provides, in pertinent part, as follows:

460bb - Establishment

In the management of the recreation area, the Secretary . . . shall utilize the resources in a manner which will provide for recreation and educational opportunities consistent with sound principles of land use planning and management. In carrying out the provisions of this subchapter, the Secretary shall preserve the recreation area, as far as possible, in its natural setting, and protect it from development and uses which would destroy the scenic beauty and natural character of the area.

16 U.S.C. 460bb.

NPS Management Policies.

NPS defines "impairment" as any authorized activity that "would harm the integrity of park resources or values, including the opportunities that otherwise would be present for the enjoyment of those resources or values." NPS Management Policies 1.4.5 (2006, Attachment 21). To ensure that an authorized activity will not violate the non-impairment mandate, NPS must determine the activity will not impair park values or resources prior to authorizing the activity. See, e.g., *Sierra Club v. Mainella*, 459 F. Supp. 2d 76, 103 (D.D.C. 2006).

In 2006, NPS updated its nation-wide Management Policies and established a precautionary approach to ensure no impairment of park resources. Rather than merely prevent the impairment of park resources, the 2006 Management Policies require NPS to prohibit "uses that would cause unacceptable impacts." NPS Management Policies 1.4.7.1 (2006). Under the Park Service's policies,

unacceptable impacts are impacts that, individually or cumulatively, would be inconsistent with a park's purposes or values, or impede the attainment of a park's desired future conditions for natural and cultural resources as identified through the park's planning process . . . or diminish opportunities for current or future generations to enjoy, learn about, or be inspired by park resources or values . . . .

Id.

As an official interpretation of the Organic Act's non-impairment mandate, 1.4 of the Park Service's Policies have been held to be enforceable against the agency. *Greater Yellowstone Coal. v. Kempthorne*, 577 F. Supp. 2d 183, n. 1 (D.D.C. 2008).

The NPS Management Policies further elucidate that the Derogation and Impairment standards, which NPS must not violate, are a single standard:

The Senate committee report stated that under the Redwood amendment, The Secretary has an absolute duty, which is not to be compromised, to fulfill the mandate of the 1916 Act to take whatever actions and seek whatever relief as will safeguard the units of the National Park system. So, although the Organic Act and the General Authorities Act, as amended by the Redwood amendment, use different wording (unimpaired and derogation) to describe what the National Park Service must avoid, they define a single standard for the management of the National Park system- not two different standards. For simplicity, Management Policies uses impairment (or a variation thereof), not both statutory phrases, to refer to that single standard.

NPS Management Policy 1.4.2.

The non-impairment standard applies specifically to the purposes for which the park unit was created, and the resources it protects:

The fundamental purpose of the National Park system, established by the Organic Act and reaffirmed by the General Authorities Act, as amended, begins with a mandate to conserve park resources and values. This mandate is independent of the separate prohibition on impairment and applies all the time with respect to all park resources and values, even when there is no risk that any park resources or values may be impaired. NPS managers must always seek ways to avoid, or to minimize to the greatest extent practicable, adverse impacts on park resources and values. However, the laws do give the Service the management discretion to allow impacts to park resources and values when necessary and appropriate to fulfill the purposes of a park, so long as the impact does not constitute impairment of the affected resources and values.

NPS Management Policy 1.4.3, emphasis added. NPS must fulfill the "fundamental purpose" of the National Park System, which is to "conserve park resources and value" and provide "for the enjoyment of park resources and values by the people of the United States." NPS Management Policies 1.4.3 (2006).

See also Attachment 24 (Ross 2013).

The Park Service is directed to further distinguish between uses mandated in the enabling legislation for that Park unit, and those uses merely authorized:

In the administration of mandated uses, park managers must allow the use; however, they do have the authority to and must manage and regulate the use to ensure, to the extent possible, that impacts on park resources from that use are acceptable. In the administration of authorized uses, park managers have the discretionary authority to allow and manage the use, provided that the use will not cause impairment or unacceptable impacts. In determining whether or how to allow the use, park managers must consider the congressional or presidential interest, as expressed in the enabling legislation or proclamation, that the use or uses continue.

NPS Management Policy 1.4.3.1.

Even when a park's enabling legislation mandates particular uses, NPS has "the authority to and must manage and regulate the use to ensure, to the extent possible, that impacts on park resources from that use are acceptable." *Id.* 1.4.3.1.

Park resources and values subject to the non-impairment standard include the parks scenery, natural and historic objects, and wildlife, and the processes and conditions that sustain them, including, to the extent present in the park: the ecological, biological, and physical processes that created the park and continue to act upon it; scenic features; natural visibility, both in daytime and at night; natural landscapes; natural soundscapes and smells; water and air resources; soils; geological resources; paleontological resources; archeological resources; cultural landscapes; ethnographic resources; historic and prehistoric sites, structures, and objects; museum collections; and native plants and animals&. NPS Management Policy 1.4.6. Opportunities for the public to experience, enjoy, and be inspired by these resources and values is also key to the non-impairment standard.

The Park Superintendent has a legally-binding responsibility to determine (1) the extent to which activities and uses (in this case, both beef cattle and dairy cattle ranching) are either mandated or authorized for Point Reyes National Seashore, and the extent to which these uses and activities are causing impairment for the resources for which Point Reyes National Seashore was established, per its enabling legislation as amended.

The Park Service may issue regulations that allow the agency to grant the privilege to graze livestock within a System unit, such as Point Reyes, but only when the use is not detrimental to the primary purpose for which that System unit was created. 54 U.S.C. 102101(a)(2) (previous version at 16 U.S.C. 3). Subsequently, the Park Service issued regulations in 1983 that prohibit livestock grazing for agricultural purposes within System units, unless a) specifically authorized by Federal statute, b) required under a reservation of rights, or c) designated as a necessary and integral part of a recreational activity or as required to maintain a historic scene. 36 C.F.R. 2.60(a). These exceptions do not apply on Point Reyes National Seashore.

Perhaps most germane to this planning process,

Before approving a proposed action that could lead to an impairment of park resources and values, an NPS decisionmaker must consider the impacts of the proposed action and determine, in writing, that the activity will not lead to an impairment of park resources and values. If there would be an impairment, the action must not be approved.

NPS Management Policy 1.4.7.

This written determination is subject to Administrative Procedures Act prohibitions on decisions that are arbitrary, capricious, or otherwise an abuse of agency discretion. The Park Superintendent must connect the facts found with the decisions made. This section also specifies that agency decisionmakers must identify unacceptable impacts that may not rise to the level of impairment, and prevent these as well. *Id.* For the purposes of NPS policy, in relevant part, unacceptable impacts are impacts that, individually or cumulatively, would

" be inconsistent with a parks purposes or values, or



" impede the attainment of a parks desired future conditions for natural and cultural resources as identified through the parks planning process, or  
" create an unsafe or unhealthful environment for visitors or employees

Id.

The Park Superintendent must also work to meet the non-discretionary standard for Improving Resource Conditions:

The Service will also strive to ensure that park resources and values are passed on to future generations in a condition that is as good as, or better than, the conditions that exist today. In particular, the Service will strive to restore the integrity of park resources that have been damaged or compromised in the past.

NPS Management Policy 1.4.7.2.

Another regulation promulgated pursuant to agency authority under the Organic Act requires NPS to prohibit livestock use in National Park System units except:

- (1) As specifically authorized by Federal statutory law; or
- (2) As required under a reservation of rights arising from acquisition of a tract of land; or
- (3) As designated, when conducted as a necessary and integral part of a recreational activity or required in order to maintain a historic scene.

36 C.F.R. 2.60(a).

The Park Services 2006 Management Policies declare that the agency will phase out the commercial grazing of livestock whenever possible. NPS Management Polices 4.4.4.1. These policies explain that the agency will only allow commercial grazing where it does not cause unacceptable impacts on park resources and values. Id. at 8.6.8.2.

The preferred alternative, and the continued livestock grazing operations within the PRNS and GGNRA violates the NPS Organic Act, the GGNRA legislation, and the Point Reyes legislation, Park Service policy and the agencies non-impairment standard for a variety of park resources ranging from tule elk to water quality to native coastal grasslands. In the case of Point Reyes National Seashore, livestock operations have heavily impaired numerous park resources, and the Park Service has an affirmative obligation to restore the integrity of those resources that have been damaged.

The draft EIS indicates that neither the stated purposes of the two parks (Point Reyes National Seashore and Golden Gate National Recreation Area), or the stated desired conditions for the parks say anything about ranching in perpetuity. Point Reyes National Seashore was established in 1962 by Public Law 87-657, the Point Reyes National Seashore Act for "purposes of public recreation, benefit, and inspiration, a portion of the diminishing seashore of the United States that remains undeveloped." For GGNRA, In order to preserve for public use and enjoyment certain areas of Marin and San Francisco Counties, California, possessing outstanding natural, historic, scenic, and recreational values, and in order to provide for the maintenance of needed recreational open space necessary to urban environment and planning, the Golden Gate National Recreation Area (hereinafter referred to as the "recreation area") is hereby established. P.L. 92-589. The document (DEIS at 2) states Point Reyes National Seashore was established for public benefit and inspiration and was designated as a national seashore to protect a rugged and wild coastal peninsula and surrounding waters that connects native ecosystems, enduring human history and recreational, scientific, and educational opportunities. Ranching cannot be done in the planning area if there is impairment of natural resources. We have observed abundant examples of impairment, as detailed throughout this comment and supporting documents. The requirement to protect, restore and preserve the park resources are incompatible with ranching.

The stated purpose of Golden Gate National Recreation Area is to offer National Park experiences to all,

including a large and diverse urban population, while preserving and interpreting the outstanding natural, historic, scenic, and recreational values of the park lands. The Draft EIS (at 2 and 3) lists desired conditions that include preservation of ecological function, preservation of native species, management of invasive, non-native species, preservation of cultural resources, and public use and enjoyment/visitor experience such as hiking and wildlife viewing. Desired conditions do not include perpetual ranching. The draft EIS (at 3) explains that in 1976, Congress amended Point Reyes legislation: NPS shall administer Point Reyes 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, and based upon, and supportive of the maximum protection, restoration, and preservation of the natural environment within the area (16 U.S.C. 459c-6). This further indicates park lands are to be managed with no impairment to their natural values.

Contrary to the park legislation, the Organic Act, and the intention of Congress, beef and dairy grazing and associated farming practices are permanently impairing the natural resources of the park. We provided photographs and descriptions of this impairment in our scoping comment letter, attached. We adopt these comments and photographs by reference into these comments.

Further examples of impairment of park resources by ranching follow:

Figure 1. Invasive, European bull thistles (*Cirsium vulgare*) in the Point Reyes National Seashore ranch area, where coastal prairie would be. (Photo: Chance Cutrano)

Figure 2. I Ranch (McClure Dairy) on Point Reyes National Seashore by August is almost completely bare of vegetation and grazed down. This was formerly coastal prairie. (Photo: Chance Cutrano)

Figure 3. Confined Animal Feeding Operation (CAFO) on L Ranch, Point Reyes National Seashore, significantly impairing native plants, native coastal prairie, and tule elk. (Photo: Chance Cutrano)

Figure 4. Noxious weed Poison hemlock (*Conium maculatum*) from the Mediterranean region, on grazed land in Point Reyes National Seashore on a dairy, where formerly coastal prairie grew. (Photo: Laura Cunningham)

Figure 5. Dairy cow at L Ranch CAFO, Point Reyes National Seashore. Introduced alfalfa hay and silage is fed to supplement the cattle because the poor range quality of the pastures cannot sustain these large numbers of cattle. (Photo: Laura Cunningham)

Figure 6. Poor quality of the grazed range in the California annual grassland pastures on dairy ranches at Point Reyes National Seashore, formerly coastal prairie plant communities. The stocking rate is too high here, and lack of rest for grassland pastures contributes to impairment of park resources. (Photo: Laura Cunningham)

Figure 7. Industrial commercial dairy near Kehoe Creek, Point Reyes National Seashore. Alfalfa hay is stockpiled in the back of the buildings. The manure and introduced weedy plants are visible here. (Photo: Laura Cunningham)

Figure 8. Dairy operation next to Kehoe Creek in Point Reyes National Seashore, showing pastures infested with weedy poison hemlock, as well as manure trucks parked next to the liquefied dairy manure pond (on the left). This impairs park native plant communities, wildlife, and water quality. (Photo: Laura Cunningham)

Figure 9. Closer view of the liquefied dairy cow manure pond, which stores manure to be spread by truck onto fields and pastures. (Photo: Laura Cunningham)

Figure 10. Manure truck loading liquefied dairy cow manure from holding pond next to Kehoe Creek, Point Reyes National Seashore. (Photo: anonymous)

Figure 11. Dairy truck spreading liquefied cow manure on pastures and fields in Point Reyes National Seashore. Manure runs off land surfaces during winter storms and contributes to lowered water quality in streams, Pacific

Ocean beaches, and Tomales Bay. (Photo: anonymous)

Figure 12. Dairy cow on L Ranch Road, Point Reyes National Seashore, causing trampling, heavy loads of manure deposition, and replacement of native deep-rooted coastal prairie bunchgrasses with shallow-rooted annual grasses from Eurasia. (Photo: Laura Cunningham)

Figure 13. Excess cattle manure from beef and dairy operations runs off pastures and into water bodies, causing nutrient loading. This in turn causes blooms of aquatic plants far above natural levels. Pond covered with excess aquatic plant growth, impairing water quality and habitat for amphibians. This should be open water. Point Reyes National Seashore. (Photo: Laura Cunningham)

### C. Ongoing Impairment of Native Coastal Prairies

NPS has completely failed to address our scoping comments on our native coastal prairie baseline descriptions and observed impacts (we are incorporating our scoping comments by reference into this comment, as well as including our field notes-Cunningham 2018).

Beef and dairy ranching on Point Reyes National Seashore directly causes and maintains non-native weeds and foreign plant assemblages, particularly in areas with heavy cattle use. Invasive weeds, including but not limited to milk thistle, Italian thistle, poison hemlock, and Italian ryegrass, are present and even dominant across the vast majority of lands used for livestock pasture on Point Reyes. By contrast, native coastal prairie plant assemblages occur only in parts of the National Seashore that seldom if ever are accessed by livestock (see Attachment 7, Cunningham, Point Reyes National Seashore March 18, 2018 field notes). Non-native crops planted for silage, notably wild mustard and wild radish, are invasive weeds that not only destroy the native plant communities where silage is planted and harvested but also invade surrounding lands, and are spreading throughout the National Seashore. NPSs impact analysis appears biased toward maintaining livestock, arguing that native plants would be harmed by removing livestock (see DEIS at 137), even though the cover of native plants is far greater, and non-native weeds are less prevalent, in the Tomales Point Elk Reserve, which has had no livestock grazing since 1980 and provides a foretaste of what the agricultural areas of Point Reyes would look like if allowed to return to nature. In addition, while NPS impacts analysis forecasts complete conversion of coastal prairie to coyote brush in 15-25 years as a possible outcome of livestock removal (DEIS at 139), it is instructive to note that this has not happened on Tomales Point after 40 years post-livestock-removal, where coastal prairie remains a dominant habitat type (see Attachment 7, Cunningham, Point Reyes National Seashore March 18, 2018 field notes). For current conditions, NPS states, the same level of cattle grazing on approximately 27,000 acres would perpetuate altered vegetation structure, species composition, and biomass production. DEIS at 125. On Tomales Point, grazed by elk only, native plants are slowly making a comeback from disturbed conditions propagated by Pierce Point Ranch operations, and the cover of native plants in this area is far greater than the cover of native plants on areas still used actively for beef or dairy cattle ranching.

Grazing is potentially harmful to rare native species of plants, and present harmful impacts would be mirrored under the agency's preferred alternative (DEIS at 133). According to NPS, Species that would continue to be adversely affected by cattle grazing or trampling include beach layia, coastal marsh milkvetch (*Astragalus pycnostachyus*), swamp harebell (*Campanula californica*), Point Reyes ceanothus (*Ceanothus gloriosus*), Marin checker lily (*Fritillaria lanceolata* var. *tristulis*), North Coast phacelia (*Phacelia insularis* var. *continentis*), and Point Reyes checkerbloom (*Sidalcea calycosa* ssp. *Rhizomata*). DEIS at 129. Listed plants also are being negatively impacted by livestock:

The other 20% of beach layia occurrences are on remnant dune features in grazed pastures on the B, C, F, and AT&T Ranches, where cattle could directly affect plants through trampling, as well as indirectly via increased weeds associated with grazing disturbance. Since 2004, the estimated beach layia population in the park has declined 84% from an estimated 35,893 plants in 2004 to 5,689 plants in 2018 (NPS 2019f). Although beach layia occurrences have increased in areas where coastal dune restoration has occurred (NPS 2019f), those subject to grazing have declined in abundance since 2004 (NPS, Parsons, pers. comm. 2019b).

DEIS at 129. NPS also notes adverse effects from heavy, poorly managed livestock grazing on Sonoma alopecurus (DEIS at 130), yet argued that some grazing may be necessary to alleviate competition from native annual grasses. Were 2,000 tule elk, rather than almost 6,000 cattle, to provide the grazing pressure, we believe that the negative effects of livestock grazing would be alleviated, while providing a more modest (and ecologically adaptive) form of grazing to supply the positive benefits. Tidestroms lupine is known to be extirpated by livestock grazing, and 15%

of the Parks population is currently in grazed areas. DEIS at 131. Irrespective of whether USFWS makes a finding of jeopardy for listed species, NPS has a responsibility to prevent impairment, which it is not presently doing. These adverse effects of livestock noted above constitute impairment of plant communities. Some alternatives would permit mowing of coyote brush to favor grasses and forbs. See, e.g., DEIS at 127. NPS should not be in the business of mechanical vegetation treatments to artificially influence the distribution of native species like coyote brush, particularly in cases where the vegetation poised to increase includes non-native weeds. Brush mowing, which is done to increase livestock forage, also kills small mammals. DEIS at 142. This practice violates NPS's nonimpairment standard. Instead, vegetation treatments should be limited to prescribed fire, which better mimics pre-settlement conditions, when indigenous Miwok peoples set fires to influence vegetation dynamics (Keegan 2012, Attachment 17).

All alternatives except Alternative F will continue unacceptable levels of impact to riparian plant communities. According to NPS,

Cattle are attracted to the shade, green vegetation, and water provided in riparian zones and tend to concentrate in riparian areas; therefore, they would continue to cause direct and indirect damage to riparian vegetation in certain locations (Spiegel et al. 2016). Overuse by cattle can degrade riparian areas by reducing vegetative cover, affecting water quality, and damaging creek banks (Bush 2006).

DEIS at 113.

The present and future degradation of riparian plant communities, which are of elevated ecological importance because they are hotspots of biodiversity, violates the Park Services nonimpairment standards.

Concerning range management, the Park Service says:

Recently, NPS contracted with the UC Berkeley Range Ecology Lab to review existing ranch management practices and make recommendations that NPS could consider and incorporate as part of this planning process. Collectively, these guidelines set forth standards and best management practices (BMPs) for ranching operations with the overall goal of administering the grazed rangelands in the park in a manner that provides for environmental protection and restoration, public recreation opportunities, and a visually aesthetic pastoral scene, while simultaneously permitting ranchers to continue traditional and viable agricultural operations. (EIS at 11)

The NPS is not required or mandated to provide for commercial, for-profit viable agricultural operations in a National Park unit. That goes against the legislation that formed PRNS and GGNRA, and Organic Act, as we detailed in our scoping comment.

Having reviewed the UC Berkeley Range Ecology Lab reports (Bartolome et al. 2015, Aoyama et al. 2018), we note that many of the recommendations are not being followed on the ranches, nor are management changes or enforcement mechanisms analyzed in this EIS that would move range conditions towards these recommendations. Plus, these academic recommendations are out-of-date with respect to the latest federal agency range management science.

The 1990 NPS Range Management Guidelines (Attachment 21) using such range measures as Residual Dry Matter (RDM), are considered outdated by other federal agencies such as Bureau of Land Management, and more up-to-date range management concepts and guidelines are used, such as indicators of rangeland health, natural range of variability, disturbance regimes, proper functioning condition, and landscape ecology approaches. Yet NPS is basing its proposed future range management on RDM, as detailed in the DEIS:

The Range Monitoring Handbook (NPS 1990b) outlines monitoring methods to ensure that the standards as set forth in the 1990 Range Management Guidelines are met and incorporated into ranch lease/permits. Specifically, it outlines the methodologies used to assess rangeland vegetation species composition (condition and trend) and conduct residual dry matter (RDM) monitoring. Monitoring is designed to determine range carrying capacities, evaluate the effectiveness of current grazing management in maintaining or improving range resources, and provide baseline data on range plant community successional dynamics. NPS established RDM and vegetation species composition monitoring locations in each ranch or pasture unit between 1986 and 1990, based on the concept of key areas, a widely used rangeland monitoring concept.

DEIS at 11.

For instance, Pellant et al. (2018 at 11, Attachment 23) describe the modernization of range management in the last 20 years:

The science of assessing rangelands changes as concepts and protocols evolve. In 1994 the National Research Council presented the concept of rangeland health as an alternative to range condition&

Rangeland health refers to a suite of soil, vegetation, water, air parameters, and ecological processes, that need to be balanced and sustained. It is important to note that NPS rated 31% of the planning area as having severe to very severe erosion hazard, 58% of soils as having low resistance to soil compaction, and 95% of the planning area as moderate to highly susceptible to wind erosion. DEIS at 65, 66. Yet NPS persists in using old-fashioned simple parameters such as RDM to permit cattle on ranches.

Even if RDM is used as a measure of rangeland health, NPS is still impairing natural resources by violating range standards. In Bartolome et al. (2015), Figure A.2 shows the residual dry matter data for the grazing leases and most violate the minimum RDM standard for the fall period. Several ranches violate the standard for all, or almost all, years in the 2000-2016 period. It seems that the NPS is not enforcing the policy to limit grazing on ranches that violate their lease-permit conditions.

In its Natural Resource Condition Assessment for Point Reyes National Seashore (NPS 2019, Attachment 21), the Park Service admits that current ranching practices have a significant impact on native plant species and coastal prairie communities:

One current conceptualization of the probable controls over plant species distribution in the coastal prairie of Pt. Reyes is that [h]istoric and current ranching practices have the largest influence on rangeland composition. This was a major conclusion of a study conducted by Robert J. Steers, 20 Years of Rangeland Monitoring in Point Reyes National Seashore, presented at the San Francisco Bay Area Science and Learning Science Symposium of 2012. Our analysis evaluates the utility of augmenting such current conceptualizations of the Point Reyes grassland landscape with ecological site concepts.

Page 117 (emphasis added).

#### Coastal Grassland Condition Summary

Coastal grasslands form a major landscape component at Point Reyes, are the primary resource for sustaining Point Reyes authorized pastoral activities, and are of high conservation interest and value. Exotic plants have extensively invaded and occupied Point Reyes coastal grassland, especially ryegrass [*Festuca perennis* (*Lolium multiflorum*)] and common velvet grass (*Holcus lanatus*). The prospects for significantly reducing common exotic annuals are poor. In addition, the native shrub, coyote brush (*Baccharis pilularis*), has encroached into Point Reyes coastal grasslands. An important coastal prairie native grass, California oatgrass (*Danthonia californica*), declined significantly at Point Reyes between 1988 and 2011, decreasing on 24 of the 37 transects on which it occurred . . . .

Pages 131-132 (emphasis added).

(NPS has failed to meet its statutory duty to preserve, restore and protect the coastal prairie by allowing overstocked pastures in both the beef and dairy ranches in the park units.

Ground disturbance is the number one factor in eliminating coastal prairie- -whether from bulldozers and development/urbanization, or trampling/grazing by heavy cattle. Another major stressor to native coastal prairie communities are invasive weeds, which are maintained and increase because of livestock grazing disturbance, as we detailed in our scoping comment.

The park describes a minimum level of current livestock management on PRNS and GGNRA:

Beef cattle are generally allowed to graze on open grassland year-round. Ranchers in the park typically provide fall/winter feed to cattle in upland areas because of winter access constraints and limited forage growth during those seasons. Mineral supplements such as salt licks or molasses are also placed in certain pastures. (EIS at 10)

Forage constraints of the California annual grassland are made quite obvious with the additional hay and supplements needed. The Park Service has still not addressed the apparent over-stocked condition of the range, nor mandated better practices such as rest-rotation grazing instead of year-long grazing, in its Preferred Alternative.

Further, the EIS says:

The dry cows are typically kept and fed in outdoor paddocks and small pastures. Heifers are fed regularly and generally graze in pastures similar to beef cattle. Current minimum organic production standards require dairy cattle to remain on pasture for a minimum of 120 days per year, and animals older than 6 months of age must get at least 30% of their dry matter intake from pasture during the grazing season&(id.)

The small pastures and paddocks where dry cows are kept are largely sacrifice zones, devoid of vegetation or harboring invasive weeds. These concentrated animal pastures act as source populations for weeds and noxious plant species that then invade native plant communities further away from the dairy core areas. The significant impacts of these small paddocks and pastures is unaddressed in the EIS.

All of this impairment caused by livestock grazing is occurring in violation of the Organic Act, PRNS and GGNRA legislation, and Park Service policy, and therefore the preferred alternative to maintain and expand livestock use is unlawful.

Mitigation measures in the DEIS Appendix D for Vegetation management, at D-14, describe Range planting:

Range Planting (550). The Range Planting practice involves the establishment of adapted vegetation on grazing land. The practice applies to rangeland, native or naturalized pastures, grazed forest, or other suitable areas where the principal method of vegetation management is grazing. Range planting is commonly used where existing stands of vegetation are inadequate for natural reseeding to occur and can be used to increase carbon sequestration. Plantings commonly include grasses, forbs, legumes, shrubs, and trees that are selected based on site-specific characteristics, erosion control and water quality improvement goals, wildlife values, carbon sequestration goals, and other management objectives such as restoration of a plant community similar to the Ecological Site Description reference state for the site or the desired plant community, or to provide or improve forage for livestock. Seeded species would be approved by NPS. Successful establishment of seeded species may require rest from grazing. Other practices, such as Herbaceous Weed Control, may be used to ensure successful planting.

We are concerned that non-native forage plants will be used to mitigate overgrazed ranges, instead of a better mitigation measure of reducing livestock numbers, restricting seasons of use, or other better range practices. NPS does not show how planting forage species would help to sequester carbon. This needs a much more thorough review. Erosion control would be better achieved by reducing stocking rates or resting pastures for several years, rather than attempting to plant cattle forage species that may not be native.

Mowing, mechanical treatment of brush (such as native coyote brush), and prescribed grazing, are also summarized in this mitigation table (DEIS Appendix D), which all pertain to cattle ranching and range management. No mitigation measures strive for restoration of native coastal prairie plant communities, which does not follow the park mandate to restore the Seashore.

Targeted grazing is a proposed mitigation measure for weed control (DEIS Appendix D at D-40), yet targeted grazing only compacts soils more, and is not an appropriate method for control of invasive species.

Figure 14. Native coastal prairie bunchgrass community along L Ranch Road, Point Reyes National Seashore, on

the ungrazed edges of a dairy pasture. This diverse community has Idaho fescue (*Festuca idahoensis*), red fescue (*F. rubra*), blue wildrye (*Elymus cinereus*), California buttercups (*Ranunculus californica*), and other native grasses, sedges, rushes, forbs, and shrubs. April 2019. This old-growth coastal prairie type was not analyzed in the DEIS, nor were our comments on this rare native plant community addressed, from our scoping comments (Western Watersheds Project et al. 2018 at 20, Attachment 27). Nor was our suggested Alternative to restore more of the planning area to this native coastal prairie. (Photo: Laura Cunningham)

Figure 15. Ungrazed native coastal prairie plants on a fenceline in a dairy ranch edge, Point Reyes National Seashore, near the Marshall Beach trailhead. Idaho fescue and Tolmie star-tulip (*Calochortus tolmiei*) were not seen on our field trip in April 2019 in cattle-grazed pastures in the planning area. (Photo: Laura Cunningham)

Figure 16. Harlequin lotus (*Hosackia gracilis*) native wildflower in the ungrazed coastal prairie remnant on L Ranch Road. April 2019. (Photo: Laura Cunningham)

Figure 17. Native coast clover (*Trifolium wormskioldii*) on the ungrazed coastal prairie remnant on L Ranch Road. April 2019. (Photo: Laura Cunningham)

Figure 18. Ungrazed native coastal prairie with deep-rooted perennial bunchgrasses, such as Idaho fescue, in the relict patch near Marshall Beach, Point Reyes National Seashore. Idaho fescue has deep roots, and the grassland knits together to hold the soil together. No erosion happens here. The coastal prairie is a sponge to rainwater. The DEIS fails to address this rare native plant community. April 2019. (Photo: Laura Cunningham)

Figure 19. By contrast, in the adjacent dairy ranch pasture within a quarter mile of the relict coastal prairie patch, coastal prairie has been eliminated, and the ground is churned to mud by cow hooves concentrated in fenced pastures, feed lots, and watering facilities. Bare ground, mud, invasive weeds, and annual grass and forbs from Europe are the only plant species in evidence. L ranch Road, Point Reyes National Seashore. (Photo: Laura Cunningham)

Figure 20. Introduced European annual grasses and forbs, such as hare barley (*Hordeum murinum* var. *leporinum*) and milk thistle (*Silybum marianum*) pictured here on a roadside south of Olema, dominate the grassy hills and valleys of Golden Gate National Recreation Area where beef cattle graze. Coastal prairies have largely been eliminated. April 2019. (Photo: Laura Cunningham)

#### D. Ongoing Impairment to Native Wildlife and Habitats.

The tule elk is a genetically-restricted, rare, and endemic California subspecies of elk. Free-ranging herds occur at only a few places, including Point Reyes National Seashore. Most of the elk here are confined behind an enclosure fence, on lands that lack adequate water and dietary nutrients to sustain elk in a healthy condition. Alternatives A, B, C, and D would artificially limit the size and range of the elk herds on PRNS. This is unacceptable. In the absence of cattle and ranching operations, the elk herd would be permitted to expand (as under Alternative F) to 2,000 animals. NPS states, in the context of current management, Competition with grazing livestock would not limit elk population size or affect the overall health of the herds. DEIS at 162. Furthermore, Overall, continuation of elk management actions under alternative A would not result in adverse impacts at the herd or population level. Id. These are ridiculously misleading statements. In fact, ranching (and NPS hazing and lethal control), together with competition with cattle for forage, is what is presently suppressing the elk population well below this 2,000-animal threshold, at approximately 700 animals. Furthermore, the elk population at Tomales Point is cordoned off from the rest of Point Reyes by an 8-foot-tall fence, specifically to block these elk from accessing Park Service lands where ranchers presently run their cattle. These outcomes represent a major impairment to Park wildlife resources, in derogation of the agency's legal mandates. At the end of 2018, the confined Tomales Point herd had 432 animals, the free-ranging Drakes Beach herd consisted of an estimated 124 animals, and the free-ranging Limantour herd had an estimated 174 animals. According to the California Department of Fish and Wildlife, as of 2018, there were approximately 5,700 tule elk present in 22 herds across California. This is up from a total of three tule elk present in California in 1870. Prior to non-indigenous settlement, it is estimated the elk population (three different species) in California was more than

500,000 animals. Failure to adequately protect and restore tule elk on Point Reyes National Seashore and Golden Gate National Recreation Area may contribute to the need to list this subspecies under the Endangered Species Act.

Tule elk numbers were severely reduced in the mid-1800s, primarily due to uncontrolled market hunting and displacement by cattle. Tule elk once inhabited the grasslands of the Point Reyes peninsula, the Olema Valley, and other grasslands in Marin County. They were the dominant grazers on these lands until they were hunted out of existence in the 1850s.

As of 2018, there were approximately 5,700 tule elk present in 22 herds across California. By comparison, as of February 2019, there are approximately 650,000 beef cows on about 11,000 different ranches in California. In addition, there are 1.8 million dairy cows in California. All told, there are currently 5.15 million cattle of all types in California ([https://www.nass.usda.gov/Quick\\_Stats/Ag\\_Overview/stateOverview.php?state=CALIFORNIA](https://www.nass.usda.gov/Quick_Stats/Ag_Overview/stateOverview.php?state=CALIFORNIA)).

The NPS purports to be proud of its tule elk reintroduction program, yet is willing to sacrifice elk every year for the benefit of ranchers. Point Reyes National Seashores website states:

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. ([https://www.nps.gov/pore/learn/nature/tule\\_elk.htm](https://www.nps.gov/pore/learn/nature/tule_elk.htm))

Point Reyes is the only National Park unit where tule elk occur.

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. (id.)

Tule elk are 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 coho salmon and local produce as being emblematic of the community.

NPS currently hazes tule elk away from agricultural lands within PRNS. DEIS at 24, 25, 82. This constitutes harassment of wildlife, and Park Service personnel and ranchers alike should not be permitted under any conditions to engage in this activity. Hazing impairs the ability of elk to access habitats within PRNS that they require to complete their life history requirements.

Lethal removal of elk is permitted under current management (DEIS at 25), and NPS's Preferred Alternative B will include shooting elk every year to keep elk numbers down to a specified level. Instead of using the term lethal control the draft EIS should be more direct and say NPS will be shooting the elk. This killing of tule elk for the benefit of ranchers runs contrary to everything the National Park Service represents.

The Preferred Alternative would suppress the natural recovery of free-ranging tule elk by imposing an artificial population threshold (DEIS at 25) that is unnatural and violates the non-impairment standards with which NPS must comply. Tule elk breeding and population and range expansion are natural processes that NPS must allow to proceed without interference. Population sizes specified for the Preferred Alternative (120 animals for the Drakes Beach Herd, DEIS at 41) are less than minimum viable population thresholds. Lacava and Hughes (1984) (Attachment 18), calculated Minimum Viable Population for elk and determined that minimum viable size is 214 animals. Meanwhile, with the removal of cattle from PRNS, the elk population could expand to its natural carrying capacity, estimated by NPS at 2,000 animals (DEIS at 48). The prevention of elk herd growth to this level constitutes an impairment of the natural wildlife resources on PRNS.

This Preferred Alternative would continue, and even expand cattle and diversified agriculture on 28,700 acres of



the proposed Ranching Zone on national seashore lands. This proposed action would allow approximately 2,400 animal units (AUs) of beef cattle and 3,130 dairy cattle in Point Reyes National Seashore and the northern district of Golden Gate National Seashore. DEIS at 13.

In contrast, numbers of native free-roaming tule elk herds are miniscule. The Drakes Beach tule elk herd consists of 124 animals and the Limantour herd has 174. Yet the park is proposing to shoot these elk if they cross over barbed-wired fences into the cattle pastures, and their meat donated to charities or tribal groups. Elk would also be hazed out of the cattle pastures, chased back into the wilderness area. This is unacceptable in a National Park unit.

We are concerned that ranchers are actively harassing wildlife, particularly tule elk, during the course of daily ranching operations. Ranchers have been caught harassing tule elk with vehicles and with dogs (see Attachments 9 and 10, FOIA 2 and FOIA 3).

This goes against the goals of the 1998 Tule Elk Management Plan to maintain viable populations of a free-range elk herd in Point Reyes and to manage with minimal intrusion to regulate population size, where possible, as part of natural ecosystem processes.

Tule elk on Point Reyes National Seashore have been infected with Johnes disease, a livestock wasting disease spread by dairy and beef cattle. NPS has, from time to time, tested tule elk for Johnes disease, often entailing lethal removal. This activity would continue under all alternatives in the GMP. DEIS at 57. Yet the agency has failed to test domestic livestock for this disease which livestock are transmitting to elk. If any livestock are allowed to remain on PRNS, they should be comprehensively tested for Johnes disease, and infected animals should be slaughtered to prevent transmission of the disease to wildlife on PRNS or anywhere else in the State of California. It appears that no alternative requires the testing and removal of infected livestock. In addition, we are concerned that Johnes disease carried and transmitted by livestock on PRNS presents a public health risk to human visitors. Spreading livestock diseases to National Seashore visitors constitutes a significant impairment of public health and safety, in conflict with NPSs legal responsibilities.

We are concerned that fences on Point Reyes National Seashore represent wildlife movement obstacles and/or barriers. According to NPS, Fences in the planning area can affect the movement of deer and other large mammals and cause injury. DEIS at 78, and see 142. The livestock fences on Point Reyes are considerably taller than standard barbed-wire fencing for cattle, and we are concerned that ranchers deliberately build their fences this way to obstruct the movements of elk. Woven-wire fencing prevents smaller wildlife from crawling under the fencing. All fences on Point Reyes National Seashore should be removed, as they impair the movements of native wildlife. To the extent that fences are not removed, they should be replaced by wildlife-friendly fencing, at the expense of the entity seeking to continue the fence in place, consisting of three strands of wire, with the top strand no more than 36 inches above the ground, the bottom strand at least 16 inches above the ground and of smooth wire, the middle wire at least 12 inches below the top wire, and woven-wire fencing should be prohibited.

NPSs proposed management of Tule elk is inconsistent with the agencies substantive duties under the Organic Act, and the PRNS and GGNRA legislation described above. Further, under Public Law 94-389, Congress has specifically recognized the importance of tule elk restoration and preservation on public lands in California and thus directed the Department of Interior to make federal lands under its jurisdiction available for the preservation and grazing of tule elk. NPSs proposed management of tule elk is inconsistent with this duty as well.

## II. The Preferred Alternative and the Draft EIS Violate the National Environmental Policy Act

The National Environmental Policy Act (NEPA) is the "basic national charter for protection of the environment." 40 C.F.R. 1500.1(a). Congress enacted NEPA with the objectives of "encouraging productive and enjoyable harmony between man and his environment" while "promoting efforts which will prevent or eliminate damage to the environment and biosphere stimulating the health and welfare of man; and enriching the understanding of the ecological systems and natural resources important to the Nation . . . ." 42 U.S.C. 4321.

In an EA or EIS, an agency must fully analyze all direct, indirect, and cumulative impacts from a proposed action in its environmental analysis. See *id.* 1502.16. "Direct effects" include those "which are caused by the action and occur at the same time and place." *Id.* 1508.8(a). "Indirect effects" include those "which are caused by the action and are later in time or farther removed in distance, but are still reasonably foreseeable." *Id.* 1508.8(b). "Cumulative impacts" result from the "incremental impact of the action" on the environment "when added to other past, present, and reasonably foreseeable future actions regardless of what agency or person undertakes such other actions." 40 C.F.R. 1508.7. Cumulative impacts can result from individually minor but collectively significant actions taking place over a period of time. *Id.* Cumulative impact analyses include private, state, and federal action. *Id.* 1508.7.

NEPA requires that the information an agency uses in conducting its environmental review must be "of high quality," and agencies "must insure the professional integrity, including scientific integrity," of their discussions and analyses, and "shall identify any methodologies used" and "scientific and other sources relied upon for their conclusions." *Id.* 1500.1(b) and 1502.24. "Accurate scientific analysis, expert agency comments, and public scrutiny are essential to implementing NEPA." *Id.* 1500.1(b).

Underlying all of NEPA's procedural requirements is the mandate that agencies take a "hard look" at all environmental impacts and risks of a proposed action. See *Natural Res. Def. Council v. Morton*, 458 F.2d 827, 383 (D.C. Cir. 1972). This review cannot be superficial, but rather agencies must take this "hard look" in light of comments submitted by the public as well as high-quality scientific information. This "hard look" standard ensures the agency gathers the needed factual information and provides sufficient information to support its conclusions.

The Draft EIS fails NEPA for the following reasons:

A. The Purpose and Need Is Impermissibly Narrow and Inconsistent With NPS Purposes and Goals.

The purpose of the EIS is to establish guidance for the preservation of natural and cultural resources and the management of infrastructure and visitor use in the planning area. (EIS at 1)

Cultural resources must be managed so as not to impair natural resources. A cultural landscape without working cattle ranches or agricultural operations would fulfill the needs of a cultural landscape and historic properties. Indeed, the historic Pierce Point Ranch, which is abandoned is the ranch that best fulfills cultural and historic obligations due to its accessibility by the public and its historic structures, which contrast markedly with many of the modern, prefabricated or industrial agricultural structures present at many Point Reyes ranches, which actively detract from the historic setting of the area. Modern ranching paraphernalia and structures actively detract from the historic setting and features of contributing structures. In order to maximize the historic value to National Seashore visitors, the ranches must be closed, noncontributing and detracting structures and features removed, and full public access be provided, as it is at Pierce Point Ranch.

The Organic Act and the two park statutes prohibit actions that permanently impair park resources unless a law directly and specifically allows for such actions. An action constitutes an impairment when its impacts harm the integrity of park resources or values, including the opportunities that otherwise would be present for the enjoyment of those resources and values. NPS Management Policies 1.4.3.

Congressional policy set forth by the National Historic Preservation Act of 1966, as amended (NHPA) (16 USC 470 et. sequential) includes preserving the historical and cultural foundations of the Nation and preserving irreplaceable examples important to our national heritage to maintain cultural, educational, aesthetic, inspirational, economic and energy benefits.

In contrast, the proposed General Management Plan amendment for Point Reyes National Seashore and the northern district Golden Gate National Recreation Area is unbalanced toward untenable commercial ranching operations within what should be Historic Districts that are open for the education and enjoyment of the public.

The EIS at 1 says that 28,000 acres of leased grazing land is the highest priority issue in park planning. But the EIS fails to analyze the extent to which degraded and sometimes dangerous water quality persists, severe erosion on salmon streams occurs, and several threatened, endangered, and sensitive species are not being protected and restored due to livestock grazing. The EIS also fails to analyze and disclose the rationale for the needs of millions of park visitors to be regarded as less of a priority than a two dozen or so commercial operators who have impaired park natural resources and thus violated their covenants.

The park purpose includes a basis in the Point Reyes National Seashore foundation statement, which was only very recently made available to the public (August 9, 2019). The preferred alternative of expanding ranching and agricultural activities, and culling native tule elk is inconsistent with the purposes and other items outlined in the foundation documents.

The EIS at 1-2 lays out the purpose statements identifying the specific reasons why Point Reyes National Seashore was established and what is most important about the park. The purpose statement for Point Reyes is as follows:

Established for public benefit and inspiration, the Point Reyes National Seashore protects a rugged and wild coastal peninsula and surrounding waters, connecting native ecosystems, enduring human history and recreational, scientific, and educational opportunities.

The purpose statement for Golden Gate National Recreation Area is (NPS 2014a):

The purpose of Golden Gate National Recreation Area is to offer national park experiences to all, including a large and diverse urban population, while preserving and interpreting the outstanding natural, historic, scenic, and recreational values of the park lands.

Preserving waters, ecosystems, natural values, and historic values is again inconsistent with expanding commercial private agricultural production on National Park lands. Will facilities need to be modernized to keep up with economic production and profitable business models, such as modern factory-farmed dairies, potential cheese-production facilities, row crop agriculture, and diversification? The large modern loafing barns, other facilities, and silage fields in the planning area are already distractions to the visual resources and natural vistas of Point Reyes, as well as intruding on the historic district and cultural landscape (see Figure 21.).

Figure 21. Modern dairy buildings and silage fields of a commercial dairy in the planning area are not historic (Photo: still frame from video by Skyler Thomas, White Shark Video/Shame of Point Reyes, 2019).

Within the planning area, the Draft EIS at 2 points out that Desired Conditions must be achieved, consistent with NPS Management Policies 2006, as follows.

Desired conditions for preservation of ecological function:

Ecological function, connectivity, and processes persist and thrive in communities, including wetland, grassland, forest, scrub, and dunes.

Sources of air, water, noise, and light pollution are limited.

Desired conditions for preservation of native species, including threatened and endangered species:

Habitats and populations of threatened and endangered species, special-status, and rare species persist and are improved.

Native plant and animal communities persist and thrive.

Desired conditions for management of invasive, non-native species:

Populations and extent of invasive, non-native species are limited such that they do not, or only minimally, affect ecosystem processes and/or functions.

Desired conditions for preservation of cultural resources:

National Register of Historic Places (National Register) historic districts, including contributing landscapes and structures, are preserved in a manner that maintains their integrity.

Historic and prehistoric archeological sites and ethnographic resources are preserved and maintained.

Desired conditions for public use and enjoyment/visitor experience:

Visitors have opportunities for diverse educational and learning experiences.

Visitors have opportunities to enjoy expanded connections and greater access to diverse recreation including, but not limited to, hiking and wildlife viewing.

We maintain that these desired conditions are not being achieved, as detailed in our scoping letter and in this comment letter on the Draft EIS. In addition, our concerns about these points remain unaddressed by the park.

Desired conditions to preserve ecological function of coastal prairies, meadows, and other native plant communities are not being met, and in our observation many native grassland and wetland communities have been seriously degraded or eliminated within the planning area. Water pollution is severe in the dairy areas such as at Kehoe Creek, and not mitigated or prevented. This creek feeds into a major public beach, posing a serious public health hazard. We detailed these concerns in our November 18, 2018 scoping comment letter. Most of our concerns have not been addressed.

Desired conditions have not been achieved to preserve native species, including rare, Threatened and Endangered species, as we describe in our November 18, 2018 letter. Conditions for coho salmon, California freshwater shrimp, tricolored blackbird, Myrtles silverspot butterfly, California red-legged frog, Western snowy plover, and numerous rare plant species are not improving, and may not persist under the conditions of high stocking rates of cattle. Native tule elk are proposed to be culled inside the park for reasons other than carrying capacity, but instead for reasons that seem to favor private ranch operations and cattle. Native coastal prairies are on the edge of extirpation within the planning area due to heavy livestock grazing rates and yearlong seasons of use, and are not thriving.

Populations of non-native and invasive plants are uncontrolled in the park, and dominate the vegetation in grassland zones. Noxious weeds are continuing to be spread by livestock with no hint of planning for reduction so that these invasive species do not affect the processes and function of native ecosystems. NPS concedes that non-native weeds are a major problem in the planning area. DEIS at 76. There is even a program wherein NPS is spending taxpayer dollars on a program to eradicate invasive weeds (DEIS at 102), even as livestock and silage operations continue to propagate them. The process of continual heavy grazing and trampling with high cattle stocking rates holds these grasslands at an early seral state which favors nonnative weeds, and does not allow the formation of native coastal prairie and valley grassland within the planning area.

The construction of modern dairy facilities, trucking in of alfalfa hay, harvesting of modern silage seed mixes, and proposal for agricultural diversification flies in the face of preserving the integrity of historic structures and cultural landscapes. Furthermore, existing and additional chicken operations adversely affects soils through excessive nutrient inputs and heavy metals content (DEIS at 106); this constitutes impairment of Park resources.

The presence of fenced, gated ranches that appear private (but are in fact publicly-owned) conflicts with and impairs visitor enjoyment and public use. See, e.g. Attachment 6 (Coda Declaration August 12, 2016). Hiking and wildlife viewing, in particular, are restricted in the planning area. Cattle have replaced native wildlife in the planning area-particularly, the tule elk. The preferred alternative would exclude tule elk further from the planning area, which does not allow for wildlife viewing opportunities to expand within this National Park unit.

The enabling legislation, quoted above, remains strong and clear on the original intent of the Park, to preserve and restore natural resources, and ensure historical interpretation for visitor benefit. Regarding the EIS claim at 3, that a Congressional conference report (House Rep. 116-9 at 720-21 (Feb. 13, 2019)) that accompanied the Consolidated Appropriations Act, 2019, somehow authorizes continuing ranching at Point Reyes National

Seashore under 20-year lease/permits, this is simply a wish-list by a few congressmen. This language claiming to authorize 20-year leases was not in the House Joint Resolution 31, Consolidated Appropriations Act of 2019 (<https://www.congress.gov/bill/116th-congress/house-joint-resolution/31/text>), and therefore is not law.

This language was included in the report at the request of Senator Feinstein (D-CA). However, report language is not law and is not binding. It only conveys the opinion of a particular subset of Congress. The NPS cannot rely on report language except to say that it supports their decision in a rhetorical sense. It is not a legal basis to justify the decision.

The report language itself is flawed in several ways, and does not represent the true intent of Congress in designating Point Reyes National Seashore. The report language says in full:

Point Reyes National Seashore.-The Conferees note that multi-generational ranching and dairying is important both ecologically and economically for the Point Reyes National Seashore and the surrounding community. These historic activities are also

fully consistent with Congress intent for the management of Point Reyes National Seashore. The Conferees are aware that the Service is conducting a public process to comply with a multi-party settlement agreement that includes the preparation of an environmental impact statement to study the effects of dairying and ranching on the park. The Conferees strongly support the inclusion of alternatives that continue ranching and dairying, including the Services Initial Proposal to allow existing ranch families to continue ranching and dairying operations under agricultural lease/permits

with 20-year terms, and expect the Service to make every effort to finalize a General Management Plan Amendment that continues these historic activities. (House Rep. 116-9 at 720-21 (Feb. 13, 2019) (<https://www.congress.gov/congressional-report/116th-congress/house-report/9/1?overview=closed>))

Dairying and beef ranching are principally ecologically impactful because cattle degrade plant communities, water quality, rare species habitat, and native plants and animals. There is absolutely no support for dairy farming contributing to the healthy functioning of native ecosystems. The Park Service cannot justify the continuation of livestock grazing on PRNS on ecological grounds.

As we have detailed in our scoping letter and in this letter, cattle ranching and dairying are not consistent with Congress publicly-supported intent for the management of Point Reyes National Seashore. No amount of private interest lobbying can change the original public intent that Congress followed, to form a National Seashore that would conserve wild natural resources for the enjoyment of the public.

#### B. The Draft EIS Is Too Broad and Vague In Its Analysis.

The Draft EIS follows a programmatic model of NEPA, with too many details subsumed in a broad, high-level, vague outline. Programmatic NEPA reviews often defer important analyses into the distant future, resulting in less public involvement and a lack of detailed site-specific review. We request, for instance, that each proposed new Ranch Operational Plan be analyzed as an Environmental Assessment in the future, rather than be tiered off of this proposed programmatic General Management Plan which purports to cover numerous individual ranch plans, each of which has unique and significant impacts on the environment. A vague, general analysis such as this Draft EIS cannot cover the needed detailed public review of each ranch's individual impacts to the environment.

For example, on our field visits to different ranch units in the parks, we observed very different plant communities, stages of grazing pressure, native and introduced species, and impacts from cattle (or no cattle). Next to the town of Bolinas in far-southern Point Reyes National Seashore is the Commonweal/Niman Ranch, mapped in Alternative B in the DEIS Appendix on page A-23 (Figure 22).

We made a field visit to the southernmost section of this ranch unit on April 14, 2019, from popular social trails on the Mesa of Bolinas next to the park boundary. This section was ungrazed, and appeared to be ungrazed by cattle for a very long time. The grasses and rushes were tall, and the old pasture was dominated by reed fescue (*Festuca arundinacea*), a European introduced livestock forage grass (Figure 23). Yet as we hiked in the ranch zone, we

found native coastal prairie species: California oatgrass (*Danthonia californica*) (Figure 24), and some native sedges and rushes.

The EIS fails to make clear what the future management on this area will be. It does not analyze or disclose whether the ranch operations will impair currently ungrazed grassland, or if these coastal prairie relicts will be protected or restored. The DEIS fails to analyze whether beef cattle will be introduced into this recovering grassland and degrade the native species, or whether popular hiking trails will be cut off by ranch operations expanding into this ungrazed popular Bolinas mesa area.

Equally troubling are the generalized activities and mitigation measures proposed in the DEIS Appendix D, which are not specific to ranches or locations. NPS is proposing non-public meetings with ranchers annually: The park would work with ranchers during annual meetings to identify projects and consolidate and coordinate review of ranch projects to complete compliance and authorize implementation, (DEIS Appendix D at D-3). These projects would include potentially new fences to control the movement of animals and people (id.), potentially new or moved water facility infrastructure such as pipes, trenches, and spring development (at D-4). Mowing, prescribed grazing, manure storage facilities, and many other activities described in the Appendix D are vague and non-localized. NPS should develop detailed maps and geographic locations of proposed new fences, trenches, manure storage ponds of facilities, and other ranching activities. The public has no ability to analyze or comment on such vague geographic locations of new fences, manure storage areas, and other activities, and their impacts on natural and cultural resources. A Supplemental EIS should be drafted by NPS to detail these proposed activities ranch by ranch, with maps of each ranch showing locations, miles of fencing, and locations of manure storage areas.

Figure 22. Alternative B map proposal of zoning of the Commonweal Ranch/Niman Ranch next to Bolinas.

Figure 23. View from the southern section of the Commonweal Ranch/Niman unit in the mapped planning area, southern Point Reyes National Seashore, next to Bolinas. Looking north. We observed ungrazed grasslands consisting of European reed fescue (*Festuca arundinacea*) pictured here, ungrazed for several years with old overgrown livestock water facilities. What are the specific NPS proposals to ensure this recovering coastal grassland will remain unimpaired into the future as coastal prairie is passively restored without beef cattle? Beef cattle in the ranch unit to the north of the canyon are visible in this photo, within the Seashore. (Photo: Laura Cunningham)

Figure 24. We found a few native coastal prairie bunchgrasses such as this California oatgrass (*Danthonia californica*) in the southern section of the Commonweal Ranch/Niman unit near Bolinas, in the vicinity of the photo taken in Figure 3. above, along social trails. How will NPS ensure these native grasses will be protected from beef cattle grazing if this is proposed in this unit. This ranch needs more specific and detailed management proposals, not a generalized treatment tiered off the vague DEIS. Again, we would be willing to take NPS personnel to these localities to survey these natural resources. Our offers in our scoping comment went unaddressed with no response from the National Park Service. (Photo: Laura Cunningham)

C. The Draft EIS Fails to Analyze and Disclose the Effects of Foreseeable Future Actions Because It Defers the Relevant Management Plans to an Unspecified Future Process.

Parts of the EIS propose deferred action, give no specific information and no public review:

Application of animal manure and compost generated in the planning area would be allowed with an approved nutrient management plan& (EIS at 39).

The DEIS Appendix D on ranch activities and mitigation measures has numerous deferred plans which the public will not be able to see or comment on, such as this proposed mitigation measure to protect water and wildlife:

Prepare and implement a spill prevention and clean-up plan, Stormwater Pollution Prevention Plan, or similar document for all construction projects to address polluted runoff and spill prevention policies, erosion control

materials required to be available on site in case of rain or a spill (e.g., straw bales, silt fencing), clean-up and reporting procedures, and locations of refueling and minor maintenance areas (DEIS Appendix D at D-24

Also deferred are such important park management activities such as silage planting: Planted species would be approved by NPS and not contain species considered noxious or weeds, DEIS Appendix D at D-22.

NPS should not have delayed additional management provisions but rather fully evaluated and disclosed the impacts of these activities in the DEIS. Without fully accounting at this stage, NPS is improperly segmenting its decisions under NEPA and failing to ensure its decisions comply with its substantive mandates under the Organic Act, the PRNS and GGNRA legislation, and other laws.

#### D. The Draft EIS Fails to Take a Hard Look at the Issues with Manure Management and Fecal Contamination Leading to Impairment of Natural Resources.

According to the DEIS, Compared to beef cattle operations, dairies produce large quantities of concentrated manure waste because of the need to keep dairy cows close to dairy headquarters for milking twice a day. DEIS at 10, and see 113. The enormous scale of manure creation results in the harmful practice of manure spreading on National Seashore lands. According to NPS, dairies manage animal manure by accumulating it in storage ponds and then spreading the liquid or slurry on fields by means of trucks or pumping through pipes that drain waste out onto fields. DEIS at 23. The EIS (id.) says, [t]ypical beef operations do not require manure management systems because cattle are regularly distributed across the landscape. Yet manure is still deposited by beef cattle on pastures, and potentially in streams and water bodies. See DEIS at 112. According to NPS, manure spreading increases soil nutrients, which increases forage species production but may have adverse impacts on native grassland plant species, some of which are less abundant in fertilized soils (Weiss 1999; GeaIzquierdo, Gennet, and Bartolome 2007). DEIS at 126. Conversely, removal of manure spreading will alleviate to some extent the invasive weed problem in cattle pastures. DEIS at 137. Stormwater runoff will still create water quality problems, and this is unaddressed. Irrespective of waivers issued by the state, this water quality degradation violates NPS nonimpairment requirements.

Concerning dairies, the Park Service says, [d]airies are high intensity operations that require extensive milking, feeding, and waste management infrastructure to meet current production and water quality management standards. DEIS at 23. According to NPS, 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 runoff (NPS 2013a; Pawley and Lay 2013). DEIS at 67. Regarding current activities on PRNS, NPS states, Alternative A would continue to contribute adverse impacts on water resources in the planning area from beef and dairy cattle ranching, nutrient management, and water use consumption related to ranching activities. DEIS at 117. For the Preferred Alternative,

The impacts from past, present, and reasonably foreseeable actions would be the same as those described for alternative A. Alternative B would continue to contribute adverse impacts on water resources in the planning area from beef and dairy cattle ranching, nutrient management, and water use consumption related to ranching activities.

DEIS at 120.

In other words, impairment of Park resources. Uniquely Alternative F would improve water quality and quality on lands currently dedicated to livestock production. DEIS at 124. These high-intensity industrial agriculture practices have no place in a National Park unit, especially one with such sensitive biological resources as PRNS.

The production of excess manure by the dairies is apparent in this description from the DEIS:

Compared to beef cattle operations, dairies produce large quantities of concentrated manure waste because of the need to keep dairy cows close to dairy headquarters for milking twice a day. Waste management is required for

manure produced in the heavy-use, high-impact areas of cattle concentration, including feeding and loafing areas, the milking parlor, and corrals. Many dairy operations include loafing barns that allow the operator to keep the milking string indoors through much of the winter, which is important for both manure management and cow health. Loafing barns are covered areas where cows can shelter, particularly during inclement weather. The barns have concrete floors and drainage systems that ensure appropriate containment and management of liquid manure. These barns also make it easier for dairy ranchers to manage manure in these confined areas. Regular manure management includes scraping and storing manure in a manure management system. These areas are managed to avoid pollution of nearby streams. The barns, milking parlors, and travel lanes between the structures are cleaned by scraping or washing manure into ponds, where the manure slurry is stored. Small pastures where cows are held between milking are typically scraped by a tractor, and the manure is stockpiled. Generally, liquid manure is sprayed or spread on pastures through a pump and irrigation system. Large trucks also spread slurry and solids by driving over pasture lands and distributing manure. These activities are conducted outside the rainy season or during dry periods. (EIS at 10-11)

This is unacceptable in a National Park unit. Yet we also have seen that this manure has not been adequately contained or managed. Not all dairy ranches have loafing barns, and the few that do, may have conflicts with National Historic District standards since at least one loafing barn is a modern industrial facility built within the last 10 years. We have seen trucks taking up liquid manure from a containment pond next to Kehoe Creek during the rainy season, apparently to be spread on pastures. We provided photo-documentation of this in our scoping comment. Therefore, we do not believe that the Park is able to restrict manure management to the dry season, and we see no stricter management controls in the Preferred Alternative that would protect water quality. While NPS notes measures that have been implemented to reduce pollution from dairies in to Kehoe Creek (DEIS at 69), there is no claim that federal Clean Water Act or state water board compliance has been achieved, and indeed in recent face-to-face meetings between NPS and WWP personnel, the NPS represented that these problems have yet to be solved. Indeed, water quality in places such as Kehoe Creek remain dangerously poor, and waivers given to dairies with no ranch manure mitigation plans in evidence. NPS should have disclosed these problems and that further ranching will likely be inconsistent with the Clean Water Act.

The spreading of manure on the hilltops of the National Seashore not only represents a biohazard and safety issue for members of the public, but it also results in an offensive smell that represents an unacceptable impairment to the environment for recreational visitors. PRNS is by law supposed to be managed primarily for public recreation and inspiration. How are members of the public supposed to find inspiration here, when the National Seashore, quite literally, smells like shit? This degradation of the scent-scape of Point Reyes represents an unacceptable impairment of Park resources. And because dairy operations would cause even greater contamination problems were the manure not liquified and spread on dry areas, it becomes obvious that the present and future operation of dairies on PRNS is impossible without violations of federal law.

We also remain concerned about the contribution to contamination of Tomales Bay posed by manure and runoff from ranches in the planning area. Some 7% of the watershed draining into Tomales Bay is occupied by ranches in the NPS planning area. DEIS at 67. Tomales Bay is currently considered impaired for nutrients and pathogens, and livestock operations are documented as a source of these contaminants. DEIS at 68. We are concerned not only about fecal coliform poisoning, which is a significant risk, but also about the possibility that Johnes disease could be transmitted to members of the public. NPS concedes that 7% of the fecal coliform samples in Lagunitas Creek exceeded the single sample contact recreation objective. DEIS at 68. The DEIS seems to be written to suggest that serious contamination problems are only an issue during periods of low water. Does this mean that NPS finds it acceptable that visitors might be sickened, or even die, from livestock-related contamination whenever low water conditions occur? Because that sounds negligent to us. Any measure greater than zero constitutes significant impairment from a public safety standpoint. Members of the public recreating on PRNS may come into contact with estuarine waters of Tomales Bay, and to the extent that contaminated runoff from PRNS ranches either is directly responsible for or contributing to dangerous levels of estuary contamination, NPS is violating its own nonimpairment standards.

NPS should carry out a cumulative analysis of all polluters into Tomales Bay, including ranches on park lands.



## E. The Draft EIS Contains an Inadequate Range of Alternatives.

The DEIS at 59 lists as an Alternative that is considered but dismissed from further analysis:

### Management of All Park Lands for the Protection, Restoration, and Preservation of Natural Resources

Commenters suggested NPS should manage all park lands solely for the protection, restoration, and preservation of natural resources. In addition to managing park lands for the protection of natural resources, NPS also must manage cultural resources and provide for visitor use and enjoyment in a manner consistent with applicable legal requirements. As a result, management decisions cannot solely be based on impacts to natural resources. This approach was dismissed from further analysis because it would not address impacts on other NPS resources and values that NPS is mandated to consider.

Moreover, the action alternatives in this EIS that include ranching would implement activities and mitigation measures to minimize impacts on natural and cultural resources while also protecting them. Additionally, the no ranching alternative would be similar in nature to an alternative focused on the protection, restoration, and preservation of natural resources on all NPS lands.

EIS, page 59 (emphasis added).

This is not simply an alternative, but is the law that must be followed by the National Park Service.

The statutory obligation to avoid impairment and to protect, restore and preserve natural resources was never proposed as an alternative. It is the law and it must therefore be followed for all the alternatives. Furthermore, protection of natural resources trumps historic preservation, recreation, etc. as clearly stated in the enabling legislation as provided below:

#### 459c-6. Administration of property

##### (a) Protection, restoration, and preservation of natural environment

Except as otherwise provided in sections 459c to 459c-7 of this title, the property acquired by the Secretary under such sections 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.)

The 1916 Organic Act has similar language providing natural resource protection a higher priority.

The range of alternatives does not include an alternative that would allow tule elk to expand into Golden Gate National Recreation Area. This violates NEPA. Even under Alternative F, which would phase out ranching on PRNS, NPS would not allow elk to expand into Golden Gate or lands outside park boundaries. DEIS at 48. Tule elk are native to GGNRA. Who is the NPS to block a native species from restoring its original populations on Park Service lands that are supposed to be managed for recreational and aesthetic purposes? The exclusion of tule elk from one administrative unit (GGNRA) while permitting their persistence on another (PRNS) is arbitrary and capricious and an abuse of discretion. Furthermore, NPS has statutory duties to permit native wildlife, particularly rare and charismatic ones like tule elk, to restore themselves to natural population levels in areas where they are ecologically suited. The entire planning area encompassed by this EIS is suitable tule elk habitat, and tule elk should be permitted to expand to fulfill their natural ecological role throughout both PRNS and GGNRA, without restrictions or impediments of any kind.

Finally, the park has never adequately protected, restored and preserved the planning area in the past. There is no reason to believe it will under the Preferred Alternative now.

The Appendices reveal that the park will be following non-binding Marin County and National Resource Conservation Service standards with respect to soil, water and vegetation actions. We do not see any mention of the three protection statutes, quoted above, that apply to the two parks as higher priorities to follow.

The management activities as described below are analyzed in the draft environmental impact statement (EIS) for a general management plan amendment for Point Reyes National Seashore (Point Reyes) and the north district of Golden Gate National Recreation Area (collectively referred to as the park). These management activities are grouped into broad categories referred to as activity types, for example, road upgrade and decommissioning (table D-1). This appendix was adapted from numerous compliance documents, including the Marin Resource Conservation District Permit Coordination Program (which was established to streamline permitting for many of the activity types listed herein), as well as previous National Park Service (NPS) National Environmental Policy Act compliance for projects, and previous Biological Opinions from US Fish and Wildlife Service and National Marine Fisheries Service. Wherever possible, activity types are also associated with one or more established US Department of Agriculture (USDA), Natural Resources Conservation Services (NRCS), Conservation Practice Standards-technical guidelines for the conservation of soil, water, air, and related plant and animal resources when implementing activities (referred in this document as practices).

Appendix, D-1 (emphasis added).

In short, the National Park Service will be following USDA farming standards. The EIS goes on for many pages listing possible actions and what USDA National Resource Conservation Service standards apply. They cover soil, water, air, and related plant and animal resources when implementing activities (referred in this document as practices). The Countys standards were not written with the Organic Act and the two park two statutes as controlling. Instead, the Park should be developing its own standards and best management practices that prioritize the preservation and restoration of natural values, sensitive species, and historic interpretation for the public.

Mitigation measures allow an agency to comply with NEPA to reduce potentially significant impacts to less than significant. But this abbreviated DEIS, with mitigated measures quickly summarized in tables in the DEIS Appendix D are too generalized and do not address each ranchs specific and unique natural resources that may be impaired. These tables do not address each Alternative or the parks Preferred Alternative, and do not provide the public with inadequate information on NPS plans.

NEPA requires NPS to consider appropriate mitigation measures and disclose the impacts of such measures. But the Draft EIS fails to do so because NPS is relying on measures that are non-binding and thus uncertain to occur. Further, NPS does not disclose how it will fund such mitigation, or whether ranchers have funding or the ability to fully implement these measures. This does not satisfy NEPA's mandate, and does not ensure that impacts are mitigated to below the impairment threshold under NPS's substantive duties.

The DEIS contains contradictory language as to how the park will mitigate significant impacts to resources. For example:

To ensure protection of natural and cultural resources, the NPS would streamline the permitting process for typical ranch maintenance activities and would provide consistent guidance to ranchers by using a management zoning framework of Resource Protection, Range, Pasture, and Ranch Core subzones.

DEIS, Appendix D, D-1 (emphasis ours).

Ensuring protection of park resources is incompatible with streamlining the permitting process for cattle grazing activities, as streamlining typically lessens public involvement, shortcuts important environment reviews, makes agency analysis insufficient, jeopardizes public land access, reduces scientific input, and compresses public

comment periods arbitrarily.

#### F. The Draft EIS Fails to Take a Hard Look at the Ecological Benefits of Reintroduction of Native Predators.

NPS dismissed alternatives that considered alternative elk management strategies other than lethal control, such as reintroducing natural predators and restoring more complete food webs. The Park incorrectly states that gray wolves were never native to Point Reyes (EIS at 61). Historical ecological studies (such as CDFW 2012-Attachment 3, Schmidt 1991-Attachment 25) summarize historical accounts, early surveys, museum specimens, and anecdotal accounts that suggest wolves were present across California from coastal areas around San Francisco Bay to the Sierra Nevada before the Gold Rush, and quickly were eliminated from the state with the influx of Euro-Americans during the settlement and market hunting phases of the late 1800s and early 1900s.

Fitzgerald et al. (2013, Attachment 8) give more detail on possible gray wolf historic range in California: The gray wolf historically occurred across most of North America, from as far north as the Arctic tundra, south through the high mountains and plateaus of Mexico, and from the maritime provinces of Canada, west to the Pacific. Wolves are habitat generalists, occupying diverse habitat types based largely on the abundance of prey, availability of den sites, ease of travel, and topography that gray wolves occupied a variety of habitats in California, where there was sufficient ungulate prey. In part, because of the extirpation or near extirpation of prey species such as the bison, Tule elk (*Cervus canadensis nannodes*), and pronghorn, it will always be difficult to precisely determine the historic range of wolves in the State.

Nevertheless, there is some consensus that gray wolves were present in the northern part of California and the Sierra Nevada mountains (Young and Goldman 1944, Hall 1981, Nowak 1995, (1987, 1991) reviewed the historical record of gray wolves in California back to the 1750s and determined that wolves likely were present in the Coastal range, the Central Valley, and the western slope of the Sierra Nevada at the time of European and Weckerly (2007) compared four early accounts of wolf distribution throughout the West to identify where wolves likely had occurred. These records indicate that wolves were likely to have occupied significant portions of California, including the Sierra Nevada mountains, the Modoc plateau and other mountainous areas of California north of San Francisco and Sacramento. The CDFW report on the historic distribution of gray wolves in California indicates that wolves were present in the northern portion of the State, and potentially as far south as the Santa Monica Mountains, north of present-day Los Angeles.

Pages 2-3 (emphasis added).

Several authors discuss spatially-explicit population models as a tool for addressing appropriate recovery goals and strategies for the gray wolf in the western U.S., depending on public lands largely. Studies have concluded that significant areas of potentially suitable wolf habitat occur in California. In the process of evaluating the status of the gray wolf in the Pacific Northwest, the US Fish and Wildlife Service overlaid predictions from three habitat models. Extensive areas in the regions described above are identified as suitable habitat by at least 2 of the 3 models. Point Reyes National Seashore and Golden Gate National Recreation Area are included in one model of potentially viable wolf habitat (see Figures 25 and 26 below).

NPS failed to analyze this reasonable alternative that has been studied by US Fish and Wildlife Service (USFWS), and supported by conservation biologists.

Figure 25. USFWS model of potential wolf habitat (in, Fitzgerald et al. 2013).

Figure 26. Detail of map in Figure 2., showing one model delineating portions of Point Reyes National Seashore and Golden Gate National Recreation Area as potential wolf recolonization habitat.

#### G. The Draft EIS Fails to Adequately Assess and Disclose the Baseline Conditions of the Project Area.

Long-term trend data are essential in a Draft EIS as part of the affected environment discussion as a baseline against which to measure changes (impacts), and are necessary to identify alternatives, which are intended to remedy those past problems, and are necessary for the NPS to set standards for each environmental indicator that

mitigation measures must then meet.

Yet the Draft EIS is wholly inadequate in describing baseline conditions for areas such as native plant communities in the planning area.

NPS statutes include those on resource inventory and management:

(Subchapter I-System Resource Inventory and Management  
(100704. Inventory and monitoring program

The Secretary shall undertake a program of inventory and monitoring of System resources to establish baseline information and to provide information on the long-term trends in condition of System resources. The monitoring program shall be developed in cooperation with other Federal monitoring and information collection efforts to ensure a cost-effective approach.

And,

100706. Integration of study results into management decisions

The Secretary shall take such measures as are necessary to ensure the full and proper utilization of the results of scientific study for System unit management decisions. In each case in which an action undertaken by the Service may cause a significant adverse effect on a System unit resource, the administrative record shall reflect the manner in which System unit resource studies have been considered. The trend in the condition of resources of the System shall be a significant factor in the annual performance evaluation of each superintendent of a System unit.

54 U.S.C. 100704, 100706.

A common method for establishing baseline conditions for an inventory and monitoring program are to use the Affected Environment portion of an EIS. Affected Environment is a description of the environment as it exists today. The Affected Environment is essentially a snapshot in time, but also can include descriptions of ongoing trends. Yet NPS has failed to field-survey a large part of the current environment at PRNS/GGNRA, and many of these areas were missed in older surveys, therefore not taking into account important native plant communities such as ungrazed coastal prairies that we photographed and described in our scoping comments, but that NPS failed to analyze (see Attachment 7, Cunningham 2018 Field Notes). The park did not respond to our scoping comments about these unsurveyed parts of the park within the planning area, where we summarized our field notes and professional observations.

NPS did not sufficiently establish baseline data for the EIS and thus is not considering all relevant factors before determining that the actions will have no significant impact. Baseline conditions are necessary to determine what effect the project will have on the environment and thus to comply with the requirements of NEPA. Great Basin Res. Watch, 844 F.3d at 1101.

Baseline conditions must provide a reasonable basis for determining the effect of the activities authorized by the agency, using the best available scientific information. The Draft EIS is already inadequate.

The Natural Resource Condition Assessment (Attachment 21, NPS 2019) concludes that the Park Service at Point Reyes National Seashore has a lot of catching up to do with simply having a current baseline vegetation map that can be used for future monitoring of trends:

The ecological communities discussed in this assessment included coastal dunes, forests, and grasslands. Assessment of these communities, as well as focal resources such as rare plants, would benefit from an updated vegetation map for the park. The detailed vegetation map for PORE is an indispensable tool for management and research. However, it is more than two decades old. Given that we are experiencing an era of accelerated ecological dynamics, the vegetation map needs to be updated as often as possible to understand ongoing shifts in the vegetation.

Page 269.

And again:

[Point Reyes National Seashore] faces some significant challenges in the coming decades including climate change, exotic pests and pathogens, the presence of non-native species, and habitat loss due to human activity. In addition, although park staff have gathered a considerable amount of information regarding natural resources, there are still many significant gaps in the existing data for natural resources and stressors. NPS resource managers need to establish and continue comprehensive monitoring projects in order to ensure that management strategies can be implemented in a timely and effective manner, so that these challenges do not result in the degradation of these valuable natural resources.

Id. (emphasis added).

The Park needs to establish baseline conditions in order to understand how ranching and livestock grazing is impacting sensitive resources. This has not been done yet and equates to a serious and significant gap in the EIS.

Accurate and up-to-date monitoring is fundamental to ensuring the effectiveness of monitoring commitments, meeting legal and permitting requirements, and identifying trends. Under NEPA a federal agency has a continuing duty to ensure that new information about the environmental impact of its proposed actions is taken into account (40 CFR 1502.9(c), requiring supplementation of an EIS where there is substantial new information or circumstances relevant to the environmental effects of the proposed action). The Park failed to analyze the significant impacts of cattle ranching and other proposed actions on a degraded landscape, and does not have a proper baseline to carry out an accurate monitoring program to ensure that decisions do not further harm the environment.

In our scoping comment, we recommended that NPS use Ecological Site Descriptions (ESDs) for monitoring plant communities and range conditions in the planning area, yet this remains unanalyzed in the Draft EIS. The UC Berkeley Range Ecology Lab, in its Natural Resource Conditions Assessment (Attachment 21, NPS 2019), also recommended the park use ESDs, for instance:

Developing more detailed Ecological Site Descriptions with associated state-and-transition models will require more widely distributed transects and better small-scale soils information.

Page 131.

Yet this recommendation failed to be taken into account so far during this public review, and the NPS has failed to respond to our comment on this subject.

Furthermore, the UC Berkeley Range Ecology Lab notes that there are large data gaps in the parks baseline information about the coastal prairies that form the rangeland base for livestock grazing in the planning area. In Table 3.2.2 on p. 30 (Attachment 21, NPS 2019), reference sites for coastal grasslands were listed as "not available." So the park has no basis for assessing trends or management of coastal prairie, having no baseline. In our scoping comments we offered to show the park the reference sites we found. This was not addressed in the summary of comments provided by the park.

NPS admitted this in its EIS:

Point Reyes recent Natural Resources Condition Assessment (NRCA) includes an analysis of 51 plots in Point Reyes grazed coastal grassland from 1988 through 2013. Coyote brush occurred in about half of the plots. It increased in cover on 10 plots, 6 of them to a major degree, and decreased in cover on 8, although in some plots, cattle grazing had ceased. The plots did not capture the full range of sites and vegetation (NPS 2019a).

Page 73 (emphasis added).

These uncaptured vegetation types include native coastal prairie species that are particularly sensitive to the stresses of livestock grazing and trampling, yet would actually be the type of original vegetation that once covered much of the planning area. These native coastal prairie and meadow species include such grasses as red fescue

(*Festuca rubra*), Idaho fescue (*F. idahoensis*), blue wildrye (*Elymus glaucus*), pacific reedgrass (*Calamagrostis nutkaensis*), and tufted hairgrass (*Deschampsia cespitosa*) (see Cunningham 2018 Field Notes). The EIS does nothing to analyze these relict native grassland vegetation types, and protect them from significant impacts of the Parks proposed large-scale agricultural activities.

The existing transects used for baseline conditions of grasslands (Figure 4.5.1, p. 113, NPS 2019) seem to be non-randomly distributed in the middle of pastures and vegetation types. This completely misses the rare relict intact ungrazed coastal prairie sites outside of pasture fences, on roadsides, and on ungrazed far pasture corners such as along L Ranch Rd, with native grasses and forbs not even mentioned in this report - - because the old survey sites completely miss them. We pointed these reference sites out to the park in our scoping comments and offered to show park staff these locations.

There are so many data gaps with coastal grassland baseline information that we cannot see how the park can justify any management alternative scientifically, in their Draft EIS.

Concerning monitoring to discover trends from any baseline, the NPS is committing itself to a very large amount of monitoring work to ensure ranchers are complying with mitigation measures. The park needs to indicate how it plans to budget for all of the wide variety of actions and monitoring work, in order to ensure proper long-term monitoring is accomplished and publicly reported. If the Park Service cannot provide the requisite baseline information in the context of an EIS, then how can the public be expected to believe that this level of field monitoring will actually take place during monitoring and mitigation?

Using Page 27 Table 2 of the EIS: Strategies for the preservation of area resources as an example. In the first box in the table alone, the NPS claims it will do the following on all lands:

Identify community types, ecological sites, their extent and distribution.

Periodically evaluate for large-scale changes.

Research and evaluate connectivity of ecosystems and flexibility of species niches.

Conduct management actions that promote habitat heterogeneity, connectivity, and species considered ecosystem engineers.

Identify previously damaged or degraded natural systems and restore where possible.

Identify and implement practices that protect soil health and minimize soil erosion.

Continue to seek funding and partnerships to restore structure and process to habitat types such as creeks, wetlands, and coastal dunes.

Implement the Point Reyes National Seashore Fire Management Plan, and update the plan as necessary, consistent with federal law and departmental management policies.

Locate and design visitor use improvements to minimize impacts to ecological function.

Based on our experience with NPS management of our public lands, this would cost millions of dollars to accomplish just these tasks. The Draft EIS should fully explain finding sources that would assure the public that their National Park units would be fully funded in order to meet the management needs of this high-value Seashore and National Recreation Area.

Claiming the Park Service will [i]dentify previously damaged or degraded natural systems and restore where possible is very misleading; clearly where possible depends on funding and staff capacity.

On page 29 of the draft EIS, at the top right, NPS would expect increased effort in management, early detection, and likely different IPM strategies for many areas where ranching is no longer occurring. There is no commitment here to do anything concrete, using the words expect and likely.

In Appendix D, Table D-11 in the draft EIS, the Park does not indicate who is responsible for monitoring or what the consequences are of non-compliance. The public should not have to rely on the ranchers monitoring themselves. Proper oversight and management of the ranches will not be possible under current budgets and meager staffing. NPS needs to better explain how monitoring and compliance of its Preferred Alternative actions will be funded and undertaken. This is inconsistent with NPS's duty under NEPA, as explained above, to evaluate mitigation measures and their impacts in detail, and disclose whether their uncertainty will prevent them from being effective. Further, ineffective and uncertain mitigation measures will not fulfill NPS's substantive duties under the other legal requirements listed above.

#### H. The Draft EIS Fails to Take a Hard Look at the Impacts of Proposed Ranching Alternatives on Wildlife.

The UC Berkeley Range Ecology Lab reports (Attachment 21, NPS 2019; Attachment 1, Aoyama et al. 2018; Attachment 2, Bartolome et al. 2015) observe that many ranches regularly violate the Residual Dry Matter (RDM) minimum required in the fall, intended to prevent erosion. Fencing cattle away from creeks also seems to be insufficient to protect water quality; removal of cattle solves water quality problems without the added ecological impacts of fencing.

Described as routine activities on the ranches that would be allowed to continue under the Preferred Alternative, the park describes driving, discing, and harvesting practices on National Park unit lands at the Seashore:

Ranchers drive vehicles and small equipment across pastures for routine ranch operations. Such operations include checking on and moving cattle, repairing fences, and distributing hay as supplemental cattle feed. In areas where silage production is authorized, tilling or discing and seeding may be conducted in the late summer, and silage harvest with mowers and harvest equipment is conducted in the late spring while the cut silage is still green. (EIS at 11)

Park visitors are told not to drive their personal vehicles across natural areas, yet private ranchers are given a pass to do this. Off-road vehicle use has a slew of significant impacts, including erosion, soil compaction, crushing of any remaining native plant species, and unintended mortality of native animal species. The Park Service has failed to take a hard look at the impacts of off-road vehicle use by ranchers, in violation of NEPA.

We are concerned that trespass grazing and/or exceedences of permitted livestock numbers has been prevalent in the past (see Attachments 11, 12, 13, 14, 15, 16: FOIA 5, FOIA 6, FOIA 8, FOIA 10, FOIA 11, FOIA 12), indicating that NPS is ineffective at managing livestock operations on PRNS.

Silage planting and mowing has very large significant impacts, such as causing mortality to nesting birds-and potentially the state endangered tricolored blackbird-and also to small mammals and the young of deer and elk. See DEIS at 143. Yet the EIS fails to quantify the magnitude and significance of these impacts in its analysis.

The park is apparently proposing in its Preferred Alternative to increase silage production in a modified Pasture subzone, in order to maintain the same stocking rates of dairy cattle, and make up for excluding a few areas from grazing, such as riparian areas and threatened/endangered species habitats.

Pasture Subzone. The Pasture subzone is identified as lands where no sensitive resources are known to occur; therefore, a suite of vegetation management activities, including seeding and mowing, may be conducted in addition to grazing. The Pasture subzone includes grazed lands that are outside the Range subzone where introduced or domesticated native forage species exist and would be used primarily for the production of livestock. Approximately 9,000 acres (nearly 34%) of the area under lease/permit would be identified as Pasture subzone. Nutrient management on dairies would be authorized in the Pasture subzone. Under alternative B, some diversification activities would be authorized in the Pasture subzone as described in the Diversification section, below. Forage production would be authorized individually as described in alternative A; however, areas of forage

production already occur in the proposed Pasture subzone.

DEIS at 35-36.

Current and future conversion of coastal grassland to silage fields planted with invasive weeds (European mustard, wild radish) that then escape into surrounding habitats and propagate themselves to the detriment of native plants constitutes an impairment of Park vegetation resources that is legally unacceptable. Net impacts on greenhouse gases should also be discussed. The NPS is also required to evaluate the visual and noise impacts of all of its activities.

#### I. The DEIS fails to Take a Hard Look at the Impacts of Proposed Ranching Alternatives of Mammals.

According to the Draft EIS, at least 40 native mammal species occur in the planning area, including black-tailed deer, coyote, gray fox, American badger, bobcat, brush rabbit, black-tailed jackrabbit, raccoon, striped skunk, and several species of bats, rodents, and shrews, and that most of those species could be affected by ranching through disturbance, competition for resources, and habitat alteration. The document states ranching could affect small mammals such as California meadow voles, black-tailed jackrabbits, Bottas pocket gophers, and western harvest mice. Could affect is not accurate-the wording should be will most likely kill. Fences in the planning area do affect the movement of deer and other large mammals and cause injury. The wording here should read does interfere with the movement&.

The draft EIS states: Mammals also include the limited number of animals that ranches are authorized to keep for personal noncommercial use (e.g., pets or guard animals), consisting of non-native species such as horses, cats, and dogs. Domestic cats are a major predator of birds and small mammals. At the very least, domestic cats kept on park lands should be required to be indoor cats only, and dogs must always be kept on leash. This is the requirement for resident employees of other National Park units, ranchers should not be exempt. And if they require guard animals, this is another strong indication that the presence of livestock is totally inappropriate on park lands.

The draft EIS states: The planning area is adjacent to beaches used by elephant seals throughout the year and occasionally other marine mammals. Although infrequent impacts to marine mammals could occur if livestock were to escape pasture fences onto beaches, it is unlikely they would affect marine mammals. What about impacts to water quality that would affect marine life? Thus, impacts on marine mammals are not analyzed further. Impacts on marine mammals should be further analyzed.

#### J. The DEIS fails to take a hard look at the Impacts of Proposed Ranching Alternatives on Birds.

Point Reyes hosts the greatest avian diversity of any National Park unit in the United States and nearly half of the bird species of North America, with around 490 species recorded from approximately 60 bird families. Many birds use the planning area for a portion, or all of their life history, particularly during spring migration and summer nesting.

Ground-nesting species, such as California horned lark, savannah sparrow, grasshopper sparrow, song sparrow, western meadowlark, California quail, and northern harrier could be susceptible to impacts from cattle grazing and vegetation management (e.g., plowing and harvesting). The DEIS fails to discuss impacts of silage mowing to these bird species.

Agricultural activities that affect songbird populations could also affect the foraging of American peregrine falcons and merlins. Several other special-status raptors rely on grassland habitats, including the burrowing owl, white-tailed kite, and ferruginous hawk, and could be affected by habitat alteration from livestock grazing and vegetation management. The draft EIS should analyze actual mortality impacts to bird populations from ranching activities, and word the EIS to reflect how affected impacts may actually mean population impacts and declines.



Agricultural activities in the planning area attract and concentrate birds that would not be there in such abundance otherwise, including common ravens, brown-headed cowbirds, European starlings. Nest parasitism by brown-headed cowbirds or competition with non-native European starlings for cavity nesting sites negatively affects native birds. Ravens are nest predators of the federally threatened western snowy plover, which nests on beaches adjacent to the planning area. NPS has documented ranching operations directly subsidizing concentrations of ravens in close proximity to nesting snowy plovers (See Attachment 11, FOIA 5; Attachment 5, Coates et al 2016), and DEIS at 102, 143). Furthermore, Ongoing dairy ranching activities would continue to promote an unnatural abundance of corvids, European starlings, and brown-headed cowbirds that compete with, prey upon, and parasitize nests of native birds, resulting in continued impacts to birds over the long term. DEIS at 144. NPS admits the significant impact on this listed species: USFWS (2002a) found that because of the indirect impacts associated with increased raven numbers, renewal of permits for ranches in the planning area 'may affect, is likely to adversely affect the western snowy plover. DEIS at 143. This statement is an admission that impairment of Park resources is ongoing as a result of continued livestock operations on PRNS.

Mitigation measures to protect nesting birds are inadequate. The DEIS only mentions this mitigation measure:

Activities (e.g., harvesting, mowing, shrub management, and seeding) would not occur during rainy or saturated soil conditions.

DEIS, Appendix D, D-2.

No mention is made of halting the harvesting, mowing, shrub removal, or other plant-disturbing activities during the bird nesting season in plant communities in Point Reyes National Seashore, which goes against the Migratory Bird Treaty Act of purposeful take of nesting birds. NPS has tracked nesting birds in the Seashore and knows that nesting birds are a risk in silage fields using eBird (D. Press PRNS biologist, personal comm. 2018). The U.S. Fish and Wildlife Service recommends:

The Service recommends conducting activities outside the bird nesting season to avoid the need for active nest relocation or destruction, when appropriate. This is because (1) successful reproduction is essential to healthy bird populations; (2) measures can often be taken in advance to prevent nesting where it will create a problem; (3) inactive nests and nests under construction may be proactively destroyed without a permit; and (4) most bird species have short nesting cycles, and it can be practicable to delay an activity until the nestlings have fledged. (<https://www.fws.gov/migratorybirds/pdf/policies-and-regulations/Nestdestructionfaq.PDF>)

Native bird species are at continuing risk of direct mortality from silage mowing activities, and other ranch management activities, without adequate mitigation. As we detailed in our scoping comments, the state endangered Tricolored blackbird has nested in Point Reyes National Seashore silage fields in the past, and has been observed numerous times in the Seashore. This fully state-protected bird could be at risk of direct mortality by silage mowing, yet we see no mitigation measures to lessen this significant impact.

Figure 27. Ravens gathering at dairy facility on Point Reyes National Seashore, attracted to introduced feed. August 19, 2019. (Photo: Skyler Thomas, White Shark Video/Shame of Point Reyes, still from video).

The park should consider Alternative F as the best way to reduce the impacts of ravens subsidized by ranch waste, instead of these minimal mitigation measures such as these:

feed livestock in a manner that discourages or precludes raven access to feed (e.g., use covered feed bunks); control access to carcasses, grain, and ranch-related and household trash/waste to reduce attracting wildlife, including ravens (DEIS Appendix D at D-38).

Figure 28. Silage mowing in the planning area, Point Reyes National Seashore. (Photo: Skyler Thomas, 2019, White Shark Video/Shame of Point Reyes, still from video)

Figure 29. Coyote scavenging an animal from newly-cut silage, Point Reyes National Seashore. (Photo: Skyler Thomas, White Shark Video/Shame of Point Reyes, 2019, still from video)

NPS has failed to take hard look at the impacts to birds and mammals such as deer, from silage harvesting and the extensive mowing of grasslands and pastures to eliminate native shrubs such as coyote brush (*Baccharis pilularis*). This is done simply to increase cattle forage and has no benefit towards restoring or protecting native plant communities. Mitigation measures such as this do little to ensure nesting birds and wildlife are protected:

As appropriate, attach flushing bars to the mower to help to flush birds and mammals (especially deer and rabbit) before the mower reaches them and mow from the middle to the outside to minimize impacts (DEIS Appendix D at D-37).

NPS should evaluate a non-mowing alternative as the best way to halt these ongoing resource impacts to native birds and wildlife.

#### K. The DEIS Fails to Take a Hard Look at Impacts of Proposed Ranching Alternatives on Amphibians.

A dozen species of reptiles could occur in the planning area. This implies more data are needed to really understand the impacts of ranching on reptiles.

The western pond turtle, a California species of special concern, uses freshwater ponds and backwater areas of large streams in the planning area. Four lizard species occur in almost every habitat, except the dampest, most interior forests and tidal salt marshes, and eight snake species could occur in the planning area.

Amphibians in the planning area, found in and near streams and ponds, include six species of salamanders and four species of frogs and toads, including the non-native bullfrog. Although extirpated or greatly reduced throughout its range in California, the federally threatened California red-legged frog is still locally abundant in the planning area. Several populations inhabit the park, and the NPS has recorded 136 known occurrences in the park, primarily associated with stock ponds. Also, the coast range newt, a subspecies of the California newt, is a special-status species found in the planning area.

The Draft EIS states (at 146): Agricultural activities could affect habitat suitability and water quality for reptiles and amphibians. This is far too vague and the potential impacts on reptiles and amphibians should be described in much more detail.

#### L. The DEIS Fails to Take a Hard Look at Impacts of Proposed Ranching Alternatives on Salmonids.

Three federally threatened anadromous fish that could occur include coho salmon, steelhead (an anadromous rainbow trout), and Chinook salmon. The Lagunitas Creek watershed supports one of the largest remaining spawning populations of the Central California Coast coho salmon evolutionarily significant unit. Steelhead from the Central California Coast distinct population segment occur in the planning area in the Lagunitas and Olema Creek watersheds and in tributaries to Drakes Estero. Chinook salmon from the California Coastal evolutionarily significant unit are sporadic visitors to the Lagunitas Creek watershed; only a few adults have been observed in 12 of 17 years. Sediment and pollutants from livestock operations adversely affect salmon and steelhead and their spawning habitats. DEIS at 144. This constitutes an impairment of Park resources.

Other special-status fish in the planning area could include the Pacific lamprey, western river lamprey, and the riffle sculpin.

Historical logging, development, and grazing in the planning area have negatively affected fish habitat as a result of sedimentation, loss of habitat complexity, and diminished riparian ecosystem function. Major perennial streams and tributaries that are habitat for federally listed fish in the Tomales Bay watershed (Lagunitas and Olema Creeks) have agricultural activities contributing to habitat degradation and reduced water quality and quantity for fishes. The EIS should detail which reaches of these streams and their tributaries are fenced from direct cattle

access. Our observations in 2019 show that cattle are still actively eroding salmonid streams directly, with ineffective mitigation.

Table 2 in the Opinion shows that cattle have access to about 3% of Lagunitas Creek that is bordered by grazing lands, about a quarter of Olema Creek bordered by grazing, and a third of Drakes Estero similarly. The average for all creeks was 16%. NMFS staff observed bare soils in pastures adjacent to creeks. Another problem documented is lack of shade plants near to the creeks. We documented similar observations of bare ground and erosion in 2019.

Figure 30. Photo taken April 15, 2019, near Five Brooks Trailhead in the Olema Creek watershed, of extreme erosion due to beef cattle along a stream in Golden Gate National Recreation Area, and failed mitigation measures such as planting grain grass and using hay rolls. The photo was full of cattle tracks still accessing this stream, and eroding the banks. Coho salmon and steelhead trout habitat here is very degraded due to beef cattle erosion. Photo by L. Cunningham.

Figure 31. Ungrazed roadside relict native plant community on the outside of the fenceline of the beef cattle-grazed pasture, Golden Gate National Recreation Area near Five Brooks. Native soap plant (*Chlorogalum pomeridianum*) and native thingrass (*Agrostic pallens*), both species highly sensitive to cattle grazing. These species were not observed on the grazed side of the fence. Native plant communities such as these are not analyzed in the DEIS, yet these native plants help hold soils together and halt sedimentation of salmonid spawning gravels. Photo by L. Cunningham.

Some efforts were made in the early 2000s to fence cattle away from creeks and to plant trees next to creeks. This restricts and impairs both wildlife movements and public access. Another related issue discussed is the dewatering of creeks due to wells taking groundwater for cattle use, in a few areas. These are all rudimentary problems in grazing management, revealing poor overall practices and weak lease enforcement.

#### M. The DEIS Fails to Take a Hard Look at Impacts of Proposed Ranching Alternatives on Invertebrates.

Thousands of aquatic and terrestrial invertebrates inhabit the planning area. Limited information about the diversity and distribution of these species is available.

Numerous flying insects are important pollinators of native plants, which could be affected by livestock grazing and vegetation management activities. Other aquatic invertebrates, including numerous insects, are important indicators of water quality and support aquatic food webs that could be affected by runoff from agricultural activities.

Two federally endangered invertebrates are known to occur in the planning area, the Myrtles silverspot butterfly and California freshwater shrimp. Surveys done in 2004 for Myrtles silverspot butterflies showed occurrences on 13 ranches, all of which support livestock operations. California freshwater shrimp are found in Lagunitas Creek and lower Olema Creek. Impacts of this species from ranching activities are ongoing. DEIS at 147. These impacts constitute an impairment of Park resources.

We discussed these concerns in our scoping comment, but these went unaddressed in the draft EIS.

#### N. Significant Impacts to Water Quality and Water Bodies Are Not Fully Analyzed.

Impacts of livestock grazing on wetland, meadows, coastal prairie, riparian areas, as well as the significant impacts of erosion, sediment input to waterways, nitrogen and phosphorus input, and coliform levels in creeks, Tomales Bay, and Drakes Estuary, and other waterways need better and more detailed analysis to comply with NEPA's hard look requirements. Again, NPS should have disclosed these problems and that further ranching will likely be inconsistent with the Clean Water Act.

Tomales Bay is in non-attainment for fecal coliform, nitrogen, and sediment, all of which come primarily from ranching and dairying operations. The Northern District of the Golden Gate National Recreation Area grazing lands drain into Olema and Lagunitas Creeks, which deliver fecal coliform, sediments, and nitrogen into Tomales Bay. To what degree are ranches on Point Reyes National Seashore contributing to this contamination problem?

This is not adequately analyzed.

Entirely missing from any environmental impact analysis are the National Marine Sanctuaries. Point Reyes National Seashore is surrounded by National Marine Sanctuaries managed by NOAA. Cordell Banks and Greater Farallones National Marine Sanctuaries protect marine resources and provide opportunities for research and birdwatching and wildlife viewing. The EIS fails to analyze the pollution levels and threats coming from beef and dairy cattle ranches where large levels of manure wash into the ocean during large rain storms. We detailed this threat in our scoping comments, but this has not been addressed. The NMFS (2004) Biological Opinion (Attachment 19) for the NPS livestock grazing program in Point Reyes National Seashore says that grazing in the Seashore and related GGNRA leases in Olema Valley damages (incidentally takes) the coho and chinook salmon and steelhead threatened species, but are not likely to jeopardize their continued existence. This Opinion says that residual dry plant material is measured in the fall and where the standard is not met, "the duration of grazing or the allowed number of cattle is reduced" (at 3). As noted above, the RDM data seem to show that the NPS does not require the lessees to reduce herd size and/or grazing duration, to improve vegetation. The NPS is said to have committed to monitoring water quality and managing permits accordingly. The NPS "will incorporate" specific salmonid protection measures such as improving stream buffers and reducing excessive sedimentation from roads. The NPS "proposes" to undertake several mitigation measures focusing on grazing damage to Olema Creek, Schooner Creek, and Home Ranch Creek. In our scoping comments we showed in photographs taken in 2019 that these creeks are still in a state of extreme erosion and cattle trampling.

In its Appendix C, the DEIS dismisses from further analysis marine resources surrounding the park units:

#### Marine Resources

Generally, the actions proposed in the EIS would not affect marine resources because they would occur outside the planning area. In cases where a particular resource may be affected, it is included for analysis under other resource topics (i.e., salt marshes are covered under vegetation). Therefore, marine resources as a stand-alone topic was dismissed from detailed analysis in the EIS.

DEIS, Appendix C, C-2.

The marine resources are not outside of the planning area, and would indeed be significantly impacted by ranches because of manure runoff during winter storms, which contributes to high fecal coliform levels and poor water quality in beaches along the Pacific Ocean of Point Reyes National Seashore, and Tomales Bay.

Tomales Bay is a Wetland of International Importance under the Ramsar convention. It is in the UNESCO Golden Gate Biosphere Reserve and is a California Critical Coastal Area. It is within the Gulf of the Farallones National Marine Sanctuary. It is a critical resting and feeding area for several species of shore birds during migration periods. The Tomales Bay Wetlands Restoration (2007-2012) report by the State Water Resources Control Board (2013), Attachment 26, found no downward trends (improvements) in fecal coliform, Nitrogen, or sediment, which are some of the standards violated there. Indeed, the aquaculture operators are not allowed to sell their shellfish for 60-100 days per year, due to fecal coliform pulses after winter rainstorms that wash manure spread on dairies into waterways and neighboring bays and the Pacific Ocean.

The San Francisco Bay Regional Water Quality Control Board (Attachment 4) found that in 2018 dairies and cattle ranches contributed to fecal coliform, Nitrogen, and sediment loading in the Bay. The Regional Water Quality Control Boards discharge permit waivers for the dairies and ranches in this watershed have increased the regulation of manure, especially for the dairies, steadily over the past 30 years, but water quality has not improved on a widespread basis for these pollutants. Waivers are given contingent on proper mitigating ranch management plans that ranches must undertake to lessen the impacts of manure on water quality. We do not see an adequate analysis of this in the Draft EIS.

To fail to even mention the basic facts about these important receiving waters below some of the grazing permits being evaluated seriously hampers the public's ability to understand the problems with current grazing leases and to propose alternatives to improve the situation. Since this history must be included in the Affected Environment section of the DEIS, the NPS should have provided this information, all of which the staff possesses, to give explanation of these problems and so facilitate better commenting on the current EIS.

Manure management, and fertilizer application plans are not detailed or specific as to location. For instance, mitigation measures are deferred into the future: Develop a nutrient budget that considers all sources of nutrients, (DEIS Appendix D at D-43). A Nutrient Management Plan is proposed to be developed by each ranch (id. At D-44), and mitigation measures are listed such as:

Apply solid or liquid waste discharges to land at rates that are reasonable for crop, soil, climate, special local situations, management system, and type of manure: Apply manure and wastewater discharges to land during

non-rainy or non-saturated conditions, ensuring that discharges do not result in runoff to surface waters and that discharges infiltrate completely within 72 hours after application; do not spread compost, manure, or fertilizer when the top 2 inches of soil are saturated or when enough precipitation to cause runoff is forecast (id.). Other than record-keeping by each rancher, no system of park monitoring protocol is discussed, so that the public can be assured that manure management will not impede water quality in the future. Nutrient Management Plans should be analyzed now for each ranch, and not deferred into the future after the Record of Decision.

Figure 32. Dairy cows accessing ponds and streams in Point Reyes National Seashore directly contribute to elevated fecal coliform levels and impaired water quality. (Photo: Skyler Thomas, White Shark Video/Shame of Point Reyes, 2019, still from video)

Figure 33. Ranch erosion, sedimentation, and direct water pollution contribute to lowered water quality and impaired natural resources. Dairy on Point Reyes National Seashore. (Photo: Skyler Thomas, White Shark Video/Shame of Point Reyes, 2019, still from video)

#### O. Important Proposed Policies Were Not Given Their Due 'Hard Look Under NEPA.

A draft Succession Policy is found on the Point Reyes National Seashore website, yet this was not analyzed as part of the draft Environmental Impact Statement (EIS).

Ranch succession is only mentioned a few times in the DEIS, such as:

It also allows NPS to consider agricultural diversification, increased operational flexibility, promotion of sustainable operational practices, succession planning, and similar ranch management practices as part of any action alternative except the no ranching alternative. (DEIS at page i)

Succession policy is mentioned in passing under Alternatives, such as:

[Alternative A, No Action] Succession. In the rare instances where a ranch family has relinquished a lease/permit, NPS has offered the relinquished land to neighboring ranchers, removed portions of the lease from ranching for natural resource purposes, or in the case of RUO expiration, initiated a lease/permit with the longstanding grazing operator. This approach would continue under alternative A. (DEIS at 13)

[Alternative B, the Preferred Alternative] Succession. In the event an existing rancher decides to discontinue ranching, NPS would implement succession planning that is consistent with maintaining multi-generational ranching in the planning area. (EIS at 37)

Vaguely stating that succession planning would occur, and failing to mention the draft Succession Policy in this public review, does not give this significant management action its due hard look under NEPA. The draft Succession Policy proposes to continue commercial livestock ranching indefinitely, by finding outside operators in the case that a ranch lessee decides to retire the permit. No mention is made of permanently retiring these lease-permits and closing the ranch to livestock, for conservation values. This is a large significant impact that the GMP could have that is unanalyzed. Any draft Succession Policy needs to be included as part of the public review process, and its impacts on park resources analyzed.

#### P. The DEIS Fails to Take a Hard Look at Impacts to Public Recreation and Inspiration.

NPS has failed to take a credible 'hard look at the impacts of the various alternatives on public recreation and enjoyment, and on visitor carrying capacity. NPS admits that once ranches are gone, the lands they currently occupy become available for trail systems, public recreation, car camping sites, and enjoyment of historical structures. Under present management (and Alternative B, which extends present management), recreational use, enjoyment, and visitor carrying capacity are constrained by the presence of the ranches, which discourage public

access and recreation. According to NPS, under a continuation of present management, Visitor opportunities related to experiencing natural sights and sounds would continue to be affected by the machinery, structures, odors, and noise associated with operating ranches. For these visitors, ranching operations in the planning area would result in continued direct, adverse impacts on their use and experience. DEIS at 166. NPS argues that Alternative B would also authorize diversification activities such as ranch tours that would result in additional beneficial impacts by creating new opportunities for visitors to observe and learn about ranch operations. The treatment of public observation of ranching operations as a recreational opportunity is a joke, because visitors opportunity to observe active ranching at Point Reyes is neither better nor even different that their opportunity to engage in exactly the same activity while passing through private ranchlands on the way to the National Seashore. The one exception is the Peirce Ranch, where the recreational opportunity is improved by being able to enter the ranch grounds and examine the buildings, all of which is only possible because Pierce Point Ranch is abandoned, and no longer a working ranch.

Furthermore, the removal of ranches allows the expansion of the elk herd to 2,000 animals, according to NPS estimates. Because tule elk are a major recreational draw for the wildlife-viewing public, this means, by itself, that Alternative F offers substantially more recreational opportunity than all the other alternatives. Yet NPS asserts that [c]ontinued management of elk would not affect visitor experience because elk viewing opportunities of the Drakes Beach and Limantour herds would continue unchanged (DEIS at 167), ignoring the indisputable fact that the prevention of elk from expanding their range and numbers, and their exclusion from actively-ranchled lands along Sir Francis Drake Road (the main thoroughfare for public access) means that fewer visitors will have the opportunity to view any elk at all. And for public use and enjoyment and visitor carrying capacity, NPSs impact analysis erroneously lists the environmental impact of Alternative F as Same as Alternative B with some additional caveats. DEIS at 50. These are mis-statements of environmental impacts among alternatives. Indeed, under Alternative F, The potential expansion of the elk population in Point Reyes would result in long-term, beneficial impacts on visitor use and experience for visitors who enjoy observing elk in their natural and historical habitat. DEIS at 171. The suppression of elk populations and the curtailment of their range on PRNS therefore is an impairment to public recreation and inspiration on the National Seashore.

As even the Park Service concedes in the Draft EIS, ranching operations diminish the visitor experience. Visitors encounter cattle on trails and roadways in the park, and have noted concerns regarding electric fencing, interactions with cattle, and manure management. Fencing interferes with visitor access as does the presence of occupied homes and ranches. The dairies in particular are unsightly and they stink.

Recreational activities are greatly curtailed in the Pastoral Zone, with fences and gates, and lack of visitor facilities, trails, and interpretive signs and displays. This is inconsistent with the purpose of the Seashore, which is for public benefit and enjoyment, not private commercial profits.

The proposal by the NPS to retain and expand ranching activities on park lands is purely political. A few very recent developments affecting the planning area illustrate this point. First, the Olema Valley Dairy Ranches Historic District was listed in the National Register on April 9, 2018, and the Point Reyes Peninsula Dairy Ranching Historic District was listed on October 29, 2018. Why didnt these listings happen earlier? Because the listings were done to try to more firmly anchor ranching into the parks. Second, Congressman Jared Huffman sponsored a bill that directed the Secretary of the Interior to manage agricultural properties consistent with Congress longstanding intent that working ranches and dairies continue to be authorized to operate on agricultural property within the Point Reyes National Seashore and Golden Gate National Recreation Area and authorized issuance of leases or special use permits of 20 years. The bill was passed by the United States House of Representatives, but fortunately the bill died in session. There are fears that even if the NPS decided to adopt Alternative E and phase out the ranches, that certain politicians would quickly try to end run the agency yet again. On the other hand, Alternative F uniquely implements the organic legislations direction to manage PRNS for public recreation and inspiration by expanding and improving recreational opportunities. This alternative entails trail linkages that connect new visitor opportunities in former ranch complexes. DEIS at 46. Furthermore, all ranch complexes would become available for adaptive reuse to support visitor opportunities. DEIS at 47. The change in land use could create additional opportunities such as a string of lodging or camping sites connected by trails. Id. Opportunities for preservation and enjoyment of historic features would also expand under this alternative, as NPS would use a wider range of techniques to interpret the history of ranching in the park,

potentially including exhibits in historic structures that are no longer actively used for ranching. Id. Thus, Alternative F uniquely among the alternatives manages the National Seashore to prioritize public recreation and inspiration. All other alternatives dedicate substantial acreage to commercial livestock production, to the detriment, and often exclusion, of public recreation.

Figure 34. Industrial agricultural equipment on park roads causing traffic and recreation hazards is incompatible with park purposes. Near Abbotts Lagoon, Point Reyes National Seashore. (Photo: Jim Coda)

Figure 35. Gated road a ranch on Point Reyes National Seashore public lands appears to limit recreation on park-owned land. This is not a private drive and gives visitors and recreational users of the park the impression that these ranches are private. (Photo: anonymous)

#### Q. The DEIS Fails to Take a Hard Look at Impacts to Wilderness.

Wilderness Areas are mentioned in the DEIS, such as where free-roaming tule elk herds dwell: The range of the Limantour herd includes designated wilderness areas (DEIS at 80). Yet the DEIS fails to analyze the impacts of the Alternatives on wilderness, especially where hazing and lethal elk removal may encroach on to or impact wilderness.

Our scoping comments on impacts to wilderness (Western Watersheds Project et al. 2018 at 86-89, Attachment 27) are unaddressed in the DEIS.

#### III. The Definition of National Historic Districts is Too Narrow Under the National Historic Preservation Act.

It is not clear that the Park Service fulfilled its duties under the National Historic Preservation Act (NHPA) to analyze the impact to cultural resources, such as to the native Miwok and other tribes, and to properly consult with all tribes. Further, the listing of the ranching district under the NHPA imposes a new host of duties on the Park to analyze, and that authorizing modern dairies and ranches, particularly when diversification is added, is inconsistent with the agency's duties under the statute

Cultural resources and infrastructure do not imply the need for the park to manage human residence and private commercial operations inside a park unit. Cultural resources can be managed for interpretive and historical needs, without working ranches or livestock being present.

Ranches and associated facilities can be managed under Alternative F perfectly well within NHPA mandates, to administer federally owned, administered, or controlled prehistoric and historic resources in a spirit of stewardship for the inspiration and benefit of present and future generations (16 U.S.C. 470-1a).

The historic and uninhabited Pierce Point Ranch in Tomales Point fulfills the need for a cultural landscape management zone and historic property. This type of management would allow for maximum protection of natural resources and restoration of such resources in the surrounding areas—here, the tule elk and coastal prairie. To fulfill the management needs for a cultural landscape, working ranch operations are not required, and in no manner are needed to educate the public and provide inspirational and aesthetic visitor experiences.

The NPS manages the Pierce Point Ranch as a non-working historic ranch, open to visitors, as described on the Point Reyes National Seashore website:

The Pierce Ranch ceased operations in 1973. Beginning in 1980, the National Park Service invested in the rehabilitation of the ranch core, citing it as the best example of a west Marin dairy ranch from the 1800s. Among the many ranches of the Point Reyes peninsula and of the nearby Olema Valley, Pierce Ranch is the one with the greatest degree of integrity of early buildings in its physical complex. Pierce Ranch is probably the least altered, least modernized, physical complex of ranch buildings in the area. Part of the ranch's main house dates to 1856, making it the oldest surviving ranch house in the Point Reyes region, if not in the whole coastal section of Marin County. Pierce Point Ranch was added to the National Register of Historic Places in 1985, and was subsequently opened to the public as an interpretive site.

Visitors are welcome to walk through the ranch complex, where interpretive signs describe the history and function of the various buildings. Historic features include the main house, a schoolhouse, a blacksmith shop,

barns, dairy houses, and many other structures. ([https://www.nps.gov/pore/planyourvisit/tomales\\_point.htm](https://www.nps.gov/pore/planyourvisit/tomales_point.htm)) NPS should describe a more complete history of this property. Pierce Point Ranch may have operated until about 1980, and Johnes disease may have spread from cattle there to the elk. This history should be detailed.

The many other historic ranches in the Pastoral Zone could equally be made into educational, historic, and interpretive areas, which would fulfill the areas recent addition to the National Register of Historic Places in 2019. To fulfill this need, we emphasize that working ranches are not necessary, and the presence of cattle are not required.

There are recent precedents where the National Park Service has managed formerly working cattle ranches as cultural landscapes and historic properties that are uninhabited, and non-working. One example is the Tassi Ranch Site within Grand Canyon-Parashant National Monument. The February 2019 approved Environmental Assessment detailed a management plan that fulfilled the need to maintain viable habitat for the special status riparian and aquatic species in the project area, and provide sustainable visitor use. The need for the proposed action is to protect the integrity of the cultural landscape, including historic structures, modern visitor infrastructure and historically appropriate vegetation (NPS and BLM 2019 at 2, Attachment 22).

This presents a balance of sustaining both natural and cultural landscapes, along with visitor benefits, and without commercial livestock and agricultural operations. The management plan for the Tassi Ranch Site ranch structures and historic landscapes conforms with the Grand Canyon-Parashant National Monument General Management Plan/Resource Management Plan in that conservation treatments are planned for structures; the cultural landscape will be maintained without working livestock commercial operations, and only certain irrigation structures will be maintained for rare amphibian conservation at springs. In balance with maintaining these historic structures, the park here will also undertake rare species conservation, restoration of springs for ecological benefits, and interpretation of the biological, hydrologic, and cultural features of the area (id.).

WiFi satellite dishes (small-scale telecommunications installations, EIS at 29) do not fit into the definition of a historic cultural landscape, and should not be allowed. Modern loafing barns and sheds do not fit within the definition of a historic cultural landscape, and should be dismantled. Plastic calf crates do not fit within the definition of a historic cultural landscape, and should be removed. Mobile homes and other prefabricated structures do not fit within the definition of a historic cultural landscape, and should be dismantled. Structures such as these impair the integrity of the two historic districts.

Cheese-processing should be a living history exhibit from the early 1900s, with interpretive staff and volunteers in period dress. The park is proposing modern industrial state-of-the-art cheese processing facilities.

Figure 36. Modern dairy loafing barn on ranch in Point Reyes National Seashore is not historic, but built within the last few decades. (Photo: Laura Cunningham)

Figure 37. Pierce Point Ranch inside the Tomales Elk Reserve is a historic ranch with visitor trails, parking facilities, and interpretive signs. There are no cattle and this is not a working ranch with human inhabitants. The grasslands here are recovering well from past dairy and beef cattle grazing, and currently have tule elk inhabiting this area. We found native grasses in the foreground of this photo: purple needlegrass (*Stipa pulchra*). This should serve as a model for how ranches can be used as historic interpretive park facilities. (Photo: Laura Cunningham)

#### IV. Conclusion.

The Draft EIS violates at least four laws: the National Environmental Policy Act (NEPA), the 1916 NPS Organic Act which requires the protection of natural resources, and the PRNS and GGNRA laws which also require the protection of natural resources.

The National Environmental Policy Act provides that agencies may analyze and evaluate alternatives that are beyond the agency's authority to implement. However, an agency may not adopt an alternative that violates federal law, regulation, or agency policy.

The NPS has for decades turned a blind eye to the adverse environmental impacts of the ranches. Leases have



been renewed repeatedly, and the NPS did not take serious steps to address the issue of the ranches until they were forced to do so because of litigation and a multi-party Settlement Agreement. Natural resources are greatly impaired in these park units, violating protective laws, conditions, and covenants that consider renewal of leasing of ranches. Ranch lease-permits are so out of bounds for protecting natural resources from impairment that the only realistic Alternative is F, to end ranching.

It is important to note that ranching on Point Reyes is insignificant in terms of the regional economy. Removal of all ranching would eliminate the production of \$16 million, which sounds like a lot of money, but is only 0.01% of the gross regional product of the study area. DEIS at ix. Conversion of dairy cattle to beef cattle results in elimination of \$14.4 million, almost the same as eliminating all livestock entirely. This demonstrates that conversion to beef cattle eliminates most of the economic inputs of the livestock industry, while retaining most of its impacts to wildlife, the land, and waters. Current visitor direct contributions to the local economy, by contrast, were \$108.5 million in 2017. It is equally important to note that NPS has failed to assess the positive economic impacts of removing livestock from PRNS on public recreation. The agency provides economic losses from elimination of the livestock industry, but fails to account for economic gains from expanded public recreation (see DEIS at vi), even though the agency concedes that recreation will indeed expand as a result of removing livestock from the National Seashore.

Now, by selecting Alternative B, the NPS continues to ignore the adverse impacts of ranching on park lands; opting for the business as usual model. This will allow the same numbers of cows that presently occur (more than 5,500), plus includes the even more egregious step of allowing diversification on the ranches-permitting pigs, chickens, sheep, and goats; horse boarding; row crops; processing of dairy products, and providing public farm stays and tours. All of these additional animals and uses will increase impacts to the environment, both on and off the ranches (direct and indirect impacts to park resources). This alternative would manage a paltry 2,600 acres as a Resource Protection zone, where no grazing would be authorized, yet limited prescribed grazing by livestock might still occur. DEIS at 35. This is absurd given that the agency has an obligation to protect resources across 100% of PRNS and GGNRA. Some 9,000 acres would be managed as the Pasture subzone, where no sensitive resources are known to occur, and seeding and mowing would be permitted. DEIS at 35. Again, this is a nonsequitur, as there are no acres on PRNS that qualify on the basis of no sensitive resources are known to occur. Native coastal prairie is a sensitive resource, for example, and species from this assemblage occur throughout the National Seashore.

Based on the PRNS and GGNRA legislation, as well as the stated purposes and desired conditions of lands in the planning area, the only legally acceptable alternative presented in the Draft EIS is Alternative F.

Language in the Draft EIS itself supports the adoption of Alternative F, not Alternative B. Alternative F would benefit soils, water quality, air quality, elk, and the experience of park visitors. DEIS at 111. Impacts of Alternative F on vegetation and soils cannot be easily summarized, but if the NPS would commit to habitat restoration after the cows are removed, both vegetation and wildlife would benefit overall from cessation of ranching. The same cannot be said about any of the other alternatives. The answer is clear: adopt Alternative F.

According to the Draft EIS, under Alternative F:

- -cessation of ranching would eliminate all impacts on soils associated with ranching activities (i.e., beneficial to soils)
- -impacts on water quality would be noticeable, long term, and beneficial (i.e., beneficial to water quality)
- -ranching-related emissions of criteria air pollutants would end (i.e., beneficial to air quality)
- -would eliminate impacts on elk related to hazing and fencing would be eliminated and the free-range population would be allowed to expand across the planning area (i.e., beneficial to tule elk)
- -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 reuse of ranch complexes no longer used for active ranching, resulting in beneficial impacts for visitors seeking these experiences (i.e., beneficial to visitor experience)

- -the potential expansion of the elk population would result in long-term, beneficial impacts for visitor use and experience related to observing elk in their native habitat (i.e., beneficial to visitor experience)

The Conservation organizations and individuals signed on to this letter support Alternative F, namely, the termination of all dairy and beef cattle ranching and commercial agricultural production on Point Reyes National Seashore and the northern district of Golden Gate National Recreation Area, and the full restoration of tule elk, coastal prairie, and other native animal and plant communities to these important and unique National Park units for full public enjoyment.

Thank you,

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Attachment 6. - Coda, J. Declaration. August 12, 2016

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Attachment 9. Freedom of Information Act (FOIA) 2, email elk stuff this week.

Attachment 10. - FOIA document 3, email Elk on Rogers Ranch, 1/24/12.

Attachment 11. - FOIA document 5, email 12/4/13.

Attachment 12. - FOIA document 6, hand-written note dated 3/20/2008.

Attachment 13. - FOIA document 8, Memo to File, Subject: Cow count 02/12/2013.

Attachment 14. - FOIA document 10, Memos on trespass and cow count, 2012.

Attachment 15. - FOIA document 11, letter to PRNS from Sierra Club, date April 8, 2008.

Attachment 16. - FOIA document 12, letter from NPS to the Lunny Ranch, dated March 21, 2007.

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Attachment 27. - Western Watersheds Project, Conservation Congress, Wilderness Watch, and Sequoia ForestKeeper. 2018. Scoping comment letter on Notice of Intent To Prepare an Environmental Impact Statement for a General Management Plan Amendment, Point Reyes National Seashore and North District of Golden Gate National Recreation Area, Marin County, California [NPS-PWR-PWRO-26857; PPWONRADE2, PMP00EI05.YP0000], November 29, 2018.

#7192

Name: Riemer, Sophia

Correspondence: I support alternative A because first of all, killing the elk is not the humane way to solve this problem and there are plenty of other solutions to this issue besides murder. If the ranchers are so unhappy with the elk then they should build sturdier fences and realize that the main purpose of the land isn't just for ranching. The land that I have grown up hiking and exploring around is diverse and the elk make it part of what it is. Please try to realize that elk are beautiful creatures that impact our environment in a positive way.

#7193

Name: N/A, N/A

Correspondence: It's very disappointing to hear that even in Marin county the youth and environmental stewards have to fight to protect the land you advertise and market for tourism. Biodiversity is threatened now more than ever before and without protections, we will lose that which California holds so dearly. Point Reyes peninsula is one of the lost special places on Earth and with the damage the T word is doing to the environment, I would expect ALL of CA to fight back - but ESPECIALLY Marin, the Bay Area, and Point Reyes!!! Almost everyone I know goes there to hike and comes back talking about the beauty, the geographic wonder, and the variety of animals! I urge you not to fall captive to capitalism or greed and to protect the nature and wildlife. It sucks to have to write and vote and speak up against that which is wrong, but I guess that's the world we live in. Please protect this land - your children's lives depend on it.

#7194

Name: Martin, Max

Correspondence: Of the 6 possible plans for the future of the Cervus canadensis nannodes (Tule Elk), option "F" is ideal for the future of the peninsula. The elk population, which has been confined to the very tip of Pt Reyes, is expanding and pushing the boundaries of the ranches. Elk were not originally native to the peninsula, but they have established themselves in the ecosystem and now could be relocated across the entirety of the park. If the ranches were removed and the elk were given a larger range, predator populations such as mountain lions could thrive, and plant populations could be held in check. Over all the ecosystem would thrive in its natural condition, which removing the ranches and freeing the elk would do.

#7195

Name: Flores, Brianna

Correspondence: There should be either reduced ranching, or no ranching whatsoever. Killing the elk, can cause

a major damage to the wildlife habitat, and create conflicts for other species living there. This species of elk, is only found in this unique location, while cattle grazing take place pretty much anywhere. It's not worth to endanger this unique native species to benefit cattle ranching, that doesn't benefit the natural environment in any way.

#7196

Name: Mainland, Edward

Correspondence: I strongly support "No ranching" alternative. Point Reyes should be returned to nature and the 24 ranches culled and extirpated, along with their cows. No matter how NPS twists things, the original intent of Point Reyes formative legislation was to protect nature. The leases to ranchers were to be 20 years only, with no intent to perpetuate ranches for all eternity. As to the idea that ranches are some kind of "cultural legacy", tell that to the Miwok. What a joke.

#7197

Name: N/A, N/A

Correspondence: Having spent time as a visitor to the Point Reyes area, I am interested in the preservation of this natural area for its ecosystem functions, and for the benefit of future generations. As an academic researcher in food-energy-water systems, environmental engineering, ecology, and atmospheric science, I am well aware of the long term consequences of land use change, and, in turn, the benefits of biodiversity and undisturbed land. The relatively "short term" economic benefits of expanding ranching simply do not balance out the long term benefits of restoring Point Reyes National Seashore. Ecosystem functions and biodiversity are not easily "engineered" and the long term consequences of destruction in Point Reyes should be judged in that regard.

#7198

Name: N/A, N/A

Correspondence: What do we want the future of the Seashore to be? Problems with funding, understaffing, and the horrible state of the current federal government aside, how can we best proceed to fulfill our duty to protect PoRe NPS: The Elk They shouldn't have been hunted out of the area in the first place and maybe shouldn't have been reintroduced to the Point at all but now that they're here the herds are growing of course. I feel like this wasn't properly anticipated and depending on your point of view or alliance (mainly Rancher v Environmentalist) there're different ideas on how to "manage" the herd. A simple hunt or responsible management compromise is the best solution to appease/anger both sides. More important issues include \*Climate Change \*the maintenance backlog and dangerous roads/trails/facilities \*understaffed Rangers and overworked volunteers \*overused areas destroying wilderness \*pollution from Ranches, local towns, visitors, etc. \*unsafe areas, closed areas, non ADA accessibility \*resources for need projects Like the Oyster Farm closure issue, the Elk issue is making this GMP about Wildlife v Rancher. Truth is, both the Elk and Ranchers wouldn't co-exist at all. However, the Elk are there and majority of people like the Elk. The Ranchers are making a profit on public lands and should be held accountable to their organic small farm standards, and they are historic and are legal family lettered farms so they are protected too. With no other predators, a responsible cull/hunt is a sensible solution, but NPS isn't about the bottom line so Rancher's need to learn to live with the herds. If it were up to me all of the Point Reyes National Seashore would be real wilderness, but since millions of people come here, many people work and live here, and they're so many roads/trails/beaches/buildings in need of maintenance and repair, we should do everything to protect and take care of PRNS

#7199

Name: Gimelli, Julianna

Correspondence: I am writing to urge the National Park Service to discontinue the grazing of beef and dairy cattle at Point Reyes National Seashore. This precious area has been damaged by livestock grazing which poses a threat

to the environment and local wildlife and it should be protected and used to serve the public good, and not for the benefit of the livestock industry.

I strongly oppose Option B and any other proposal that would be fatal to Tule Elk or other wildlife to the benefit of ranching operations, and encourage the agency to adopt Option F to discontinue grazing and allow members of the public to enjoy this beautiful park and to be enriched with opportunities to visit and appreciate this special place.

#7200

Name: Xanos, Constantina

Correspondence: As a member of the California-based international animal protection nonprofit organization In Defense of Animals with over 250,000 supporters, I oppose the National Park Service plan to kill native Tule elk, grow commercial crops, and permit ranchers to add chickens, turkeys, sheep, pigs, and goats to their exploitative operations. For this reason, I support Alternative F.

As national park land, this property was specifically set aside to protect, restore, and preserve the natural environment including the wild animals who live there. The original intention was to phase out dairy and cattle ranching, not add more crops or animals to increase ranching profits.

The proposed plan does not address the damage from grazing, including water-quality degradation and soil erosion. Also, adding new crops will create more conflicts with native wild animals.

Please abandon this inhumane and destructive plan by selecting Alternative F. I urge you to restore the Seashore's Pastoral Zone for wild animal habitat and repurpose historic ranch buildings for scientific research, interpretation, and public education.

#7201

Name: Muthukumar, Anitha

Correspondence: Adopt Alternative F

#7202

Name: Ray, Thomas

Correspondence: All the ranching alternatives in the Draft Environmental Impact Statement involve the impairment of natural resources. Three National Park Service laws prohibit actions that will impair natural resources (the 1916 NPS Organic Act, Point Reyes National Seashore legislation Section 459c-6, and Golden Gate National Recreation Area legislation Section 460bb). Consequently, the Park Service should prepare a supplemental DEIS with ranching alternatives that comply with applicable laws requiring the protection of natural resources. The Park Service should then circulate that supplemental DEIS for public comment.

Thank you!

#7203

Name: Alvarado, Melanie

Correspondence: I oppose the National Park Service plan to kill native Tule elk, grow commercial crops, and permit ranchers to add chickens, turkeys, sheep, pigs, and goats to their exploitative operations. For this reason, I support Alternative F.

As national park land, this property was specifically set aside to protect, restore, and preserve the natural environment including the wild animals who live there. The original intention was to phase out dairy and cattle ranching, not add more crops or animals to increase ranching profits.

The proposed plan does not address the damage from grazing, including water-quality degradation and soil erosion. Also, adding new crops will create more conflicts with native wild animals.

Please abandon this inhumane and destructive plan by selecting Alternative F. I urge you to restore the Seashore's Pastoral Zone for wild animal habitat and repurpose historic ranch buildings for scientific research, interpretation, and public education.

#7204

Name: Gescheidt, Jack

Correspondence: Dear NPS,

Point Reyes Nat'l Seashore is a stunning, precious public land set aside for wildlife and human visitors. Cattle ranching and ranching of ALL kinds should be terminated so that ONLY wild animals, wildlife, and human visitors can enjoy it.

To know that ranchers are applying political pressure to KILL tule elk, or in their terms "cull the herd," is extremely upsetting. Their businesses-for-profit grazing pollutes Point Reyes' clean water, the Pacific ocean, the land and even the air (with, among other pollutants, methane) harming wildlife and inevitably human health.

I am a fervent supporter of Alternative F, which would phase out the cattle and dairy industries in the park.

My local, Marin County-based environmental organization has an email list representing over 2,000 environmentally-minded citizens.

Sincerely, Jack

#7205

Name: kennedy, judy

Correspondence: Preservation of wildlife is more important than more hamburgers. We could all use a little less meat in our lives; and in pursuit of saving more of our environment and wildlife, we'd also be supporting a sustainable environment. We all feel joy and freedom when observing wildlife pursuing its own goals.

#7206

Name: Weisblatt, Jonathan

Correspondence: Please do NOT kill Elk here. Please do NOT put more cattle, cows, goats, chickens, etc. there. Think of the land. Think of the complex biological diversity and the very few places where we can allow Nature to be Wild. This seems like an absurdly obvious choice. Please don't be clouded by colonialist-capitalist opinions. Listen to the seventh generation into the future, listen to the wilderness, listen to all our relatives. Thanks.

#7207

Name: Butler, Ann

Correspondence: If it weren't for the ranchers' cooperation, we wouldn't have the Point Reyes National Seashore in its current form. The ranchers should be allowed to continue to operate their ranches. However, the Tule elk should be reasonably culled, not exterminated completely.



#7208

Name: Rose, Sheryl

Correspondence: I Strongly Oppose the scheme to kill native elk and expand corporate agriculture in Point Reyes National Seashore and Golden Gate National Recreation Area.

Our Public Lands belong to the People and Must be preserved for the benefit of this and future generations.  
Commercial use destroys Our environment!

Thank you.

#7209

Name: GOODMAN, TERESA

Correspondence: I am writing to urge the National Park Service to discontinue the grazing of beef and dairy cattle at Point Reyes National Seashore. This precious area has been damaged by livestock grazing which poses a threat to the environment and local wildlife and it should be protected and used to serve the public good, and not for the benefit of the livestock industry.

I strongly oppose Option B and any other proposal that would be fatal to Tule Elk or other wildlife to the benefit of ranching operations, and encourage the agency to adopt Option F to discontinue grazing and allow members of the public to enjoy this beautiful park and to be enriched with opportunities to visit and appreciate this special place.

#7210

Name: Gahm, Tara

Correspondence: Please select option F and discontinue farming and increase visitors.

#7211

Name: Hollander , David

Correspondence: Cows do not belong in Pt Reyes. Elk do belong in Pt Reyes.

#7212

Name: Harte, Jean

Correspondence: Not only should ranching not be expanded in Point Reyes National Seashore, it should be removed entirely, as was the original intention, when in 1962, each ranching family was paid \$57 million (\$340 million in today's dollars) and given the generous 25 years, with tax breaks and low rent, in which to phase out their operations.

Fifty-seven years later, they are still there, with their 6000-odd cows trampling and polluting the land and water, their use of land to grow food for those cows to eat, and their silage machinery that decimates native birds and other small wild creatures, and have the audacity to argue that they have a natural, cultural "right" to be there. The purchase of the land from the ranchers was specifically to establish a national park, in which to protect the whole of the delicate ecosystem, of which the Tule Elk and all other creatures play an essential part.

I support Alternative F because ranching, with all its water pollution, destruction of land, native plants and wildlife essential to the ecosystem, has no place in a national park, especially one that is in the top 25 most biologically diverse in the state.

Much of the state, indeed much of the planet, is already given over to cattle farming, a practice that the UN report tells us must be radically reduced to head off climate change.

#7213

Name: Gerbode, Colin

Correspondence: The function of a park is not to be agricultural land, rather as a space for the public to enjoy, for recreation. Destruction of iconic native species like tule elk in order to open the land for agriculture runs directly counter to the entire concept of 'park' and as a California resident and park user I vehemently oppose this decision.

#7214

Name: Humphries, Debbie

Correspondence: Public lands, such as our National Parks, belong to all of us. Or I should say are supposed to belong to all of us. Sadly anymore much of it belongs to ranchers. Those of us who enjoy the outdoors should not have to visit National Park areas where there is cow manure on the trails and waterways. Nobody goes outdoors to hike, fish, camp, and see wildlife hoping to see cows! Too much continues to be taken over in the name of greed. Our environment is suffering because of it. We also should not be killing or displacing native wildlife for non native farm animals.

#7215

Name: McClintock, Amy

Correspondence: Are you out of your minds? Do NOT shoot native elk for farm animals, please.

#7216

Name: Hopkinson, Douglas

Correspondence: Please discontinue farming and ranching opportunities within the Point Reyes National Seashore and do not allow the culling of Tule Elk. Protection of wild native species should take precedence over business interests including farming. Cattle grazing negatively affects ecosystems, causing water pollution and soil erosion, spreading invasive species and disease, and harming endangered species.

Thank you for your consideration.

#7217

Name: Shortle-Turner, Tracy

Correspondence: Save the parks!

#7218

Name: Varacallo, Mary

Correspondence: The native fauna including the elk deserve to live in their habitat and not be polluted by cattle. Cattle destroy the land and ground water and destroy the entire ecosystem.

#7219

Name: Eck, Donna

Correspondence: Please leave the Tule Elk alone. I come to Pt. Reyes to see Tule Elk, not cattle.

Our planet is suffering because of cattle. Let the Tule Elk be.

#7220

Name: Maslin, Linda

Correspondence: The public lands and native wildlife on Point Reyes National Seashore and Golden Gate National Recreation Area need to be conserved - not replaced with cattle and commercial agricultural expansion.

#7221

Name: Painter, Michael

Correspondence: Dear Superintendent Muldoon:

I am writing on behalf of the more than 920 members and supporters of Californians for Western Wilderness (CalUWild), a citizens organization dedicated to encouraging and facilitating participation in legislative and administrative actions affecting wilderness and other public lands in the West. Our members use and enjoy the public lands in California and all over the West.

We appreciate this opportunity to comment on the Draft Management Plan Amendment for Ranching in the Pt. Reyes National Seashore.

We strongly urge the Park Service to adopt Alternative F-phasing out ranching. We strongly support Alt. F for several reasons.

First: Alt. F is the only alternative that is legally consistent with the Park Service Organic Act of 1916. The Organic Act states that national parks (and by extension, national seashores) must be managed to conserve the scenery, natural and historic objects, and wild life& 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. The key word is unimpaired.

Second: The legislation establishing Point Reyes states as its purpose to save and preserve, for purposes of public recreation, benefit, and inspiration, a portion of the diminishing seashore of the United States that remains undeveloped. And again, it shall be administered by the Secretary without impairment of its natural values, & consistent with . . . the maximum protection, restoration, and preservation of the natural environment within the area. Ranching is nowhere mentioned as a purpose for the Seashores establishment.

The DEIS makes it abundantly clear that every alternative besides F will impair the resources and the ecosystem. Therefore, none of them is legally adequate or defensible under existing law.

Third: When the Seashore was established, the expectation among the public and the ranchers themselves was that ranching would not continue indefinitely. In furtherance of this understanding, legislation was passed that appropriated funds to buy out the ranchers. They were then given leasebacks, and restrictions were placed on the length of those leases, in addition to restrictions on ranchers ability to transfer them outside of their families. Leases could be extended for shorter terms, but there was and has never been a firm requirement that leases be extended.

The Park Service should finally implement the original vision for the Seashore. Alt. F is the only alternative that comes close to doing this.

We oppose the Preferred Alternative, Alt. B, for many reasons.

First: Alt. B allows ranchers to actually increase their commercial operations at the Seashore to include the raising of other animals, such as turkeys and pigs, to grow vegetables and row crops, and to allow paying overnight guests at ranches and other tourist activities such as ranch tours. None of these activities is a historic use of the land, which might support some sort of exception. Furthermore, National Parks and Seashores are not established in

order to be commercial hubs for private businesses, particularly not within their boundaries, and even more particularly on land that no longer belongs to the business owners. The ranchers at Pt. Reyes are now lessees, please remember. These proposals are completely unacceptable in a national seashore.

Second: We object strongly to the killing of Tule Elk that come into conflict with ranching operations. While it may be necessary to cull the herds in some way for ecological reasons in the absence of predators (non-lethal methods are preferred), doing so to assist private commercial interests is completely antithetical to the purpose of any National Seashore. It is unacceptable.

Third: Alt. F. is not a balanced plan. It offers the ranchers almost everything they asked for during the scoping process, as set forth in the scoping letter from the Ranchers Association dated 2 June 2014. The ecosystem itself and the general public for whose benefit the Seashore was created receive no benefit from the Plan.

To the extent that the alternatives other than Alt. F include these undesirable aspects, we oppose them as well.

The question comes down to this: What is a National Seashore for?

CalUWild and most Americans believe it is to save and preserve, for purposes of public recreation, benefit, and inspiration, a portion of the diminishing seashore of the United States that remains undeveloped, precisely as the establishing legislation states. It is not to foster private businesses, especially when it has been clearly demonstrated-by the Park Services own DEIS-that their activities are damaging the very resources the Seashore was originally established to protect.

Pt. Reyes National Seashore appears on a list of places most contaminated by fecal coliform bacteria-among the 10% most polluted areas in the United States and top 10 places in California. (<https://therevelator.org/wasted-water-crappiest-places/>, the data coming from the U.S. Geological Survey.)

Ravens have been documented feeding on the remains of small mammals after the mowing of silage. Raven are known to be predators of other species, such as the Snowy Plover, which is on the Threatened and Endangered Species list and which the Park Service is supposedly working to protect. No activities that artificially support raven populations should be allowed. Its as if the right hand doesnt know what the left hand is doing. Mowing also destroys the nests of ground-nesting birds, as well. Part of the Park Services mission is to protect wildlife species, not promote their destruction.

Grazing alters the natural vegetation of the landscape. This is clear to any visitor driving though the Seashore. Areas with cattle have few or no native plants. Huge areas are fields of mud, especially around dairy facilities, and even more so in the rainy season. In the rainy season, Seashore roads are often a muddy mess.

The ranches and the Park Services record of protecting the resources of the Seashore is dismal in the ranching zone. There is no reason to have confidence that the situation will change now.

Instead, Pt. Reyes National Seashore should be managed for its landscape and its wildlife-the natural ecosystem.

Wildlife should always take priority over livestock. Dairy and beef ranching should be phased out as was originally intended, preferably within five years. There should absolutely be no increase in the level of commercial activity allowed to leaseholders in the Seashore. Areas impacted by ranching should be restored to naturally functioning landscapes for wildlife habitat, native plant communities, scientific research, and education. And historic ranch buildings should be repurposed for public education, scientific research, and interpretative uses.

Repeated studies by the Point Reyes Bird Observatory/Point Blue Conservation Science and others have made recommendations along these lines. They have never been implemented. The time to do so is now.

Thank you for the opportunity to comment. Please inform us of your decision in this matter and please also inform us of further opportunities to be involved in your public decision-making processes.

Respectfully submitted, Michael J. Painter Coordinator

#7222

Name: Walsh, Mark

Correspondence: Mark A. Walsh September 23, 2019

Superintendent Cicely Muldoon Point Reyes National Seashore 1 Bear Valley Road Point Reyes Station, CA 94956

Re: DEIS-GMP Public Comment Oppose Plan B - Support Plan F

My name is Mark A. Walsh. I have walked along the lands, beaches, forests, estuaries, bays, creeks, and ocean of Point Reyes National Seashore (PRNS, the Seashore) since 1978 - 16 years after President John F. Kennedy signed the 1962 U.S. Congressional enabling legislation into law, specifically to protect this rugged California coastal region from development for all Americans and for peoples of the world.

This law establishing our Seashore states it is not created to preserve ranches and ranchers, but to save and preserve, for the purposes of public recreation, benefit, and inspiration, a portion of the diminishing seashore of the United States that remains undeveloped. Further, the Purpose Statement for our Point Reyes National Seashore states: Established for public benefit and inspiration, the Point Reyes National Seashore protects a rugged and wild coastal peninsula and surrounding waters, connecting native ecosystems, enduring human history, and recreational, scientific, and educational opportunities.

The National Park Service (NPS) and Department of the Interior (DOI) grievously, irresponsibly, and callously err and abdicate sound stewardship with their strenuous promotion of the current DEIS-GMP Plan B - an asymmetrical near-militaristic assault on our national parks lands and waters. Past and current Seashore management leadership officials likewise actively deliver shameful and disingenuous words and actions, seemingly as pawns of or agents for special-interest commercial- and industrial-level private rancher, livestock, ag, and land development business owners, lawyers, and lobbyists. As often do our federal U.S. Representatives and Senators, who likely have never truly witnessed and experienced with boots-on-the-ground experiences the travesty wreaked upon lands, waters, wildlife, and flora of our national Seashore.

I have studied, learned, observed, and experienced myriad natural settings, fauna, and flora throughout the Seashore at all times of day, evening, and night. This has extended into similar experiences throughout the Golden Gate National Recreation Area (GGNRA).

My substantive public comments come from using the rightfully-purchased publicly-owned lands and waters of PRNS and GGNRA - witnessing and experiencing for over 4 decades the willful attacks and abuse on these national parks by 24 private, law-breaking, uncooperative, disruptive, and destructive dairy/beef rancher and related ag businesses who have controlled and expanded their influence and destruction for nearly 6 decades. The majority of these 24 erstwhile quaint family farms and ranches opposed the enabling 1962 PRNS legislation, and have metastasized into commercial- and industrial-level dairy/beef ranching, livestock, ag, and development operations - polluting public lands and waters, and traumatizing or killing wildlife and wild flora in their private business pursuit of profits with the help of government subsidies and tax schemes.

Rather than weight 5 of the 6 PRNS DEIS-GMP plans for private ranching, livestock, ag biz, and retail expansion, the NPS should adhere to all NPS laws and policies to restore and protect lands, waters, wildlife, and wild flora - as prioritized and required in its own founding legislation, and in the enabling PRNS and GGNRA legislation. The Interior Department, NPS, PRNS, and GGNRA should implement Plan F's principles.

Time did not start with ranching on the Point Reyes peninsula - whether with 24 private rancher businesses in 1962, or during 1800s Americanos property takeovers, or with earlier Spanish mega-hacienda land-grants. This was an ancient open landscape with true native cultural icons and stewards of wildlife, wildlands, wildwaters, and wild flora. To compare respectful and honorable practices of native Miwok or Ohlone cultures to present ag bizs loafing barns; cattle yards and feed lots; PVC single-calf enclosures; rutted unpassable trail erosions; fetid bovine-wasted coastal prairies and creeks; miles of restrictive barbed and electric wire fences; cattle-generated methane gas levels more concentrated and harmful than annual vehicle visitations; and all other private government-subsidized ranching and ag operations is either intentional cultural history fabrication, or fantastical delusion. Go ask the remnants of these native peoples what they think of the cultural heritage and ranching expansion actions past and present of the NPS and PRNS/GGNRA management plans as cultural or historical fact and truth - ask surviving Miwok and Ohlone peoples if they support absolute and total lands, waters, wildlife, and native flora desecration.

NO ON PLAN B - YES ON PLAN F!

Mark Walsh, One Persons Direct Substantive Experience - Point Reyes National Seashore and Golden Gate National Recreation Area - Plan B Would Even Further Damage of Wildlands, Wildwaters, Wildlife, and Wild Flora

" Estero Trail: trampled, muddied, rutted, seeping with cattle feces and urine; vast fenced-off inaccessible acreages; navigation through bovine herds, cleaning cattle excrement off boots in what is to be a wilderness experience; passing fetid cesspool-like algae-choked ponds and runoffs; filthy bridges; disease risk and exposure; unsafe/unhealthy family recreation; noxious smells; methane; non-native plants suffocating native plants; cattle not wildlife proliferation; little-to-no ground wildlife; crows, starlings, cow birds, and ravens. " Hearts Desire/Indian Beaches: massive manure-induced algae blooms/mats at supposed swimming beaches; disease risk and exposure; extensive cattle and ag development/byproduct waste runoff on beaches/cliffs and into bay/surf; disease risk and exposure; unsafe/unhealthy family recreation; private ranching, livestock, and ag business operations threaten endangered/marine species; crows, starlings, cow birds, and ravens. " Abbotts Lagoon, McClures, Kehoe Trails/Beaches: adjacent overgrazed and bare-earth coastal prairie (so-called Pastoral Zone to be designated the more aggressive Ranch Zone); fetid cesspool-like algae-choked ponds and runoffs; filthy bridges; extensive cattle and ag development/byproduct waste runoff on beaches and into lagoons/ponds/creeks/surf; cattle excrement accumulation in multiple runoffs to lagoon/ponds/beaches/ocean; disease risk and exposure; unsafe/unhealthy family recreation; noxious smells; methane; cattle not wildlife proliferation; non-native plants suffocating native plants; little-to-no ground/dune/aerial wildlife; private ranching, livestock, and ag business operations threaten endangered/marine species; crows, starlings, cow birds, and ravens. " Drakes Beach/Trail: trampled, muddied, rutted, seeping with cattle feces and urine; extensive fenced-off inaccessible acreages; adjacent overgrazed and bare-earth coastal prairie (so-called Pastoral Zone to be designated the more aggressive Ranch Zone); noxious smells; methane; cattle not wildlife proliferation; little-to-no ground wildlife; non-native plants suffocating native plants; extensive cattle and ag development/byproduct waste runoff on beaches and into bay/surf; disease risk and exposure; unsafe/unhealthy family recreation; private ranching, livestock, and ag business operations threaten endangered/marine species; crows, starlings, cow birds, and ravens. " Agate Beach/Duxbury Reef Beach/Palomin Beach: extensive cattle and ag development/byproduct waste runoff on beaches/cliffs and into surf; cattle excrement accumulation in multiple runoffs to beaches/ocean; disease risk and exposure; adjacent overgrazed and bare-earth coastal (so-called Pastoral Zone to be designated the more aggressive Ranch Zone); extensive fenced-off inaccessible acreages; disease risk and exposure; unsafe/unhealthy family recreation; private ranching, livestock, and ag business operations threaten endangered/marine species; crows, starlings, cow birds, ravens. " Bull Point Trail: trampled, muddied, rutted, seeping with cattle feces and urine; extensive fenced-off inaccessible acreages; inclusive and adjacent overgrazed and bare-earth coastal prairie (so-called Pastoral Zone to be designated the more aggressive Ranch Zone); noxious smells; cattle not wildlife; little-to-no ground wildlife; non-native plants suffocating native plants; extensive cattle and ag development/byproduct waste runoff on beaches and into bays/estuaries/surf; navigation through bovine herds, cleaning cattle excrement off boots in what is to be a wilderness experience; noxious smells; methane; disease risk and exposure; unsafe/unhealthy family recreation; private ranching, livestock, and ag

business operations threaten endangered/marine species; crows, starlings, cow birds, and ravens. " Millerton Point/Beach: extensive cattle and ag development/byproduct waste runoff on beaches and into bay/surf; cattle excrement accumulation in multiple runoffs to beach/bay; disease risk and exposure; unsafe/unhealthy family recreation; adjacent overgrazed and bare-earth coastal prairie (so-called Pastoral Zone to be designated the more aggressive Ranch Zone); large adjacent fenced-off inaccessible acreages; private ranching, livestock, and ag business operations threaten endangered/marine species; little-to-no ground/dune wildlife; crows, starlings, cow birds, and ravens. " Jewell/ Bolinas Ridge Trails: trampled, muddied, rutted, seeping with cattle feces and urine; extensive fenced-off inaccessible acreages; adjacent overgrazed and bare-earth coastal prairie (so-called Pastoral Zone to be designated the more aggressive Ranch Zone); navigation through bovine herds, cleaning cattle excrement off boots in what is to be a wilderness experience; noxious odors; methane; cattle not wildlife proliferation; little-to-no ground wildlife; non-native plants suffocating native plants; extensive cattle and ag development/byproduct waste runoff on trails; noxious smells; methane; disease risk and exposure; unsafe/unhealthy family recreation; crows, starlings, cow birds, and ravens. " Bay (Tomales) Trail: trampled, muddied, rutted, seeping with cattle feces and urine; navigation through bovine herds, cleaning cattle excrement off boots in what is to be a wilderness experience; inclusive overgrazed and bare-earth coastal prairie and riparian habitat (so-called Pastoral Zone to be designated the more aggressive Ranch Zone); extensive fenced-off inaccessible acreages; private ranching, livestock, and ag business operations cause threats to endangered species; non-native plants suffocating native plants; fetid cesspool-like algae-choked ponds/creeks/runoffs; filthy bridges; disease risk and exposure; unsafe/unhealthy family recreation; noxious smells; methane; non-native plants suffocating native plants; cattle not wildlife proliferation; little-to-no ground wildlife; crows, starlings, cow birds, ravens. " Great/North Beach: adjacent overgrazed and bare-earth coastal prairie and riparian habitat (so-called Pastoral Zone to be designated the more aggressive Ranch Zone); extensive fenced-off inaccessible acreages; private ranching, livestock, and ag business operations cause threats to endangered species; extensive cattle and ag development/byproduct waste runoff on cliffs/dunes/beaches; non-native plants suffocating native plants; little-to-no ground/dune wildlife; cattle excrement accumulation in multiple runoffs to beach/ocean; disease risk and exposure; unsafe/unhealthy family recreation. " Overlooks and Vistas - Ranching Operations West of Inverness Ridge - from Mt. Vision, Pt. Reyes Hill, Sir Francis Drake Highway, and Pierce Point Road: huge private commercial/industrial-level beef/dairy businesses; concentrated central operations cattle/feed lots, complexes, and compounds occupying 2-20 acres; despoiled, rutted, muddied coastal prairie and riparian habitat (so-called Pastoral Zone to be designated the more aggressive Ranch Zone); concentrated mega-buildings, cattle pens/paddocks, loafing barns, ranch/farm vehicles/equipment/implement/machinery; cleared/removed native and non-native foliage, brush, trees; extensive cattle and ag development/byproduct waste runoff; extensive fenced-off inaccessible acreages; vast overgrazed and bare-earth coastal prairie and riparian habitat (so-called Pastoral Zone to be designated the more aggressive Ranch Zone); noxious smells; methane; cattle not wildlife proliferation; crows, starlings, cow birds, and ravens. " Etc. - Plan B Increases and Expands Existing Damages to Coastal Prairie, Woodlands, Trails, Creeks, Runoffs, Ponds, Lagoons, Estuaries, Bays, Beaches, Ocean, and Vast Fenced-Off Inaccessible Public Lands and Waters.

First, I strongly and unequivocally - once again and still now for over these 4 decades of my direct experiential witness and exposure within PRNS and GGNRA - object to the NPS, PRNS, and GGNRA officials comprehensive, derelict, and gross mismanagement of our public Seashores national park wildlands, wildwaters, wildlife, and wild flora.

Second, I strongly and unequivocally object to the completely misguided and unscientific Plan B promoted and preferred by NPS and PRNS management that serves special-interest commercial- and industrial-level private rancher, livestock, ag, and land development business owners, lawyers, and lobbyists. Such plans and implementations fall against significant laws, policies, and regulations of the Organic Act of 1916 establishing the NPS, as well as the enabling legislation establishing PRNS and GGNRA. I further object to Plans A, C, D, and E for similar or other legal, ethical, scientific, health, or safety reasons.

Third, I strongly and unequivocally oppose Plan B and support Plan F, to be considered as a starting point to incorporate exact specifics to once and for all, after 57 years since the Seashores creation: " completely remove from PRNS and GGNRA all ranching, cattle, large and small livestock, agriculture, or other development-type

business operations " cease planning and implementation of proposed private rancher business income diversifications; expanded acreage and numbers of dairy and beef cattle; allowance of row crops; introduction of small livestock operations (pigs, goats, sheep, chickens, ducks, turkeys, rabbits, etc.); allowance of retail overnight accommodations, hospitality venues, shops, and roadside stands " remove or cease planning and implementation of all similar, related, and attenuated private business development activities " and fully facilitate, encourage, and deliver restoration and protection of wildlands, wildwaters, wildlife, and wild flora, especially for free and open proliferation of iconic Tule elk In essence, to the most complete and thorough scope and degree, immediately and henceforth prioritize restoration and protection of PRNS and GGNRA for the health, well-being, education, research, experience, and enjoyment of present and future generations through the utmost science- and ethics-based sound wildlands, wildlife, wildwaters, and wild flora restoration and protection principles and practices.

Since the 1960s, the 24 rancher businesses negotiated for and were compensated fair-market value (appraised at over \$350M in today's dollars) for their properties. Lease-back arrangements to ranching operations over these 57 years have proven the disregard and actual contempt these coddled parties have for millions of their brethren and for the lands, waters, fauna, and flora abused by their reckless attitudes and actions. Of a total 71,000 PRNS acres, 28,000 acres (39.4%) are already in de facto control of publicly-subsidized private rancher, livestock, and related ag and land development business operations. The NPS and PRNS leadership are to hold accountable these current private rancher, livestock, ag, and land development business operations through legislative, administrative, and legal oversight, enforcement, and punishment&..and regularly and continuously opt to ignore or fail their official NPS and PRNS roles and responsibilities of service to the greater millions of the American people, all for 24 rancher businesses.

What dollar value can legitimately be placed on increasingly rare wild spaces?

Is \$350M an accurate current assessment for nearly 30,000 acres of California coastline, what ag and land developers consider (with dollar-signed eyes) prime real estate? Is \$700M? Is \$2B? \$5B? \$10B? How can the present privately-owned, publicly-subsidized, and tax-free ranch operations in PRNS and GGNRA - which either by owner or spouse death, or by 25-year life estate maximum extension - still be squatting on and insistently, even proudly, ravaging our publicly-owned and increasingly vulnerable PRNS and GGNRA national parks lands, waters, wildlife, and wild flora?

What explains the continued and adamant support of NPS and PRNS over 57 years for the worst options for environmental, ecological, scientific, even cultural restoration and protection for our Seashore and GGNRA?

The Point Reyes Seashore Ranchers Association website has one page, and its first sentence is: Our members are families who have owned and operated small ranches within the pristine landscape that is now the Point Reyes National Seashore.

Small? Blocking off and controlling nearly 40% of PRNS public national park land and waters? Nearly every view and vista overcome with commercial/industrial-sized dairy and beef ranching operations? Pristine? Cattle defecation, manure, urine, and ag waste that incubates as potential disease stew harmful to humans and wildlife, seeping and floating across soil, water, and air? Massive concentrated commercial/industrial-level private ranch compounds that look like nuclear sites?

NPS, PRNS, and GGNRA management already abrogates its legal and ethical responsibilities. And yet prefers even more super-sized wholesale destruction through Plan Bs woeful structure, mechanics, and non-science. As conditions are today, it will be a herculean undertaking just to restore the existing damage by ranching, livestock, and other ag biz operations over the past 57 years of ranching stewardship.

Have the Point Reyes Seashore Ranchers Association (PRSRA) and Resilient Agriculture Group (RAG) in the end - with rancher, ag, and land development proponents Kevin Lunny, Phyllis Faber, Sara Rolph, John Doolittle, Baker Botts, and other local and national private ag business operators, for-hire civil/criminal lawyers, and local and federal special interest lobbyists - deliberately compromised NPS or PRNS/GGNRA management at the



expense and value to all Americans safe and healthy access to experience and enjoy our Seashore national park? Has our U.S Representative Jared Huffman or U.S. Senator Dianne Feinstein ever gotten out of an SUV and walked along PRNS and GGNRA bovine-waste-infused lands and waters - where cattle manure and urine stagnates in mass irregular liquid puddles, floats in tangled gaseous algae mats in ponds and creeks, or runs off and spews loosely into Tomales Bay or the Pacific Ocean, visibly and viscerally fouling beaches and surf?

Will NPS and PRNS/GGNRA management ever act on behalf of this nations current generations and future generations - rather than for 24 private rancher businesses that generate little benefit and cause exponential harm to nearly 40% of our Seashore? What about our California leadership role in responsible climate action? Or will NPS and PRNS/GGNRA officials cave once more, and act as if they exist literally to cow-tow to 24 private rancher businesses at full-go-for-more concessions to steal from our national park?

If NPS and PRNS/GGNRA management officials so desire to work in the frameworks of the BLM, Forestry Service, or Department of Agriculture, they may consider transfer to those entities, leaving NPS, PRNS, GGNRA, and other national parks to be led by those who will follow U.S. laws pertaining to the NPS.

Dairy, beef, and related livestock and agriculture markets inexorably and deservedly are collapsing as humans strive for more healthy nutrition and lifestyles - just as scientifically-established exorbitant and deadly concentrations of methane gas from livestock ranching disastrously impacts our global climate. The NPS and PRNS/GGNRA management - in oddly quizzical, illogical, and even illegal actions - promote and support private rancher and ag businesses on our Seashore and other public national park lands. This not only continues but dangerously expands these management officials own devastating climate-impact effects that poison our soil, waters, and air - and our rights to coexist with our own and other species.

In closing, I strongly and unequivocally oppose Plan B and support Plan F, to be considered as a starting point to incorporate exact specifics to once and for all, after 57 years since the Seashores creation: " completely remove from PRNS and GGNRA all ranching, cattle, large and small livestock, agriculture, or other development-type business operations " cease planning and implementation of proposed private rancher business income diversifications; expanded acreage and numbers of dairy and beef cattle; allowance of row crops; introduction of small livestock operations (pigs, goats, sheep, chickens, ducks, turkeys, rabbits, etc.); allowance of retail overnight accommodations, hospitality venues, shops, and roadside stands " remove or cease planning and implementation of all similar, related, and attenuated private business development activities " and fully facilitate, encourage, and deliver restoration and protection of wildlands, wildwaters, wildlife, and wild flora, especially for free and open proliferation of iconic Tule elk In essence, to the most complete and thorough scope and degree, immediately and henceforth prioritize restoration and protection of PRNS and GGNRA for the health, well-being, education, research, experience, and enjoyment of present and future generations through the utmost science- and ethics-based sound wildlands, wildlife, wildwaters, and wild flora restoration and protection principles and practices.

Plan F Starting Points for Exact and Specific PRNS/GGNRA Priority, Planning, Policy, Action, and Enforcement

1. Phase out all ranch, livestock, agriculture, and other development as was originally intended by the establishing legislation for PRNS and GGNRA, or to otherwise restore and protect the Seashore
2. Prioritize and manage the Seashore for the natural landscapes, resources, and values it was created to preserve - wildlands, wildwaters, wildlife, and wild flora
3. Restore, encourage, and protect wildlands, wildwaters, wildlife, and wild flora - cease private rancher businesses, livestock operations, and expansion into small livestock, crops or row crops, harvesting, processing, storage, hospitality and accommodations, retail shops and stands, and all similar, related, and attenuated private business development activities.
4. Restore and protect the so-called Pastoral Zone and similar areas back into naturally healthy and sustainable coastal prairie, woodland, riparian, bay, ocean, wildlife, wild flora, and other natural habitat, emphasizing protection for appropriate education, research, recreation, and enjoyment.
5. Repurpose 3-or-less scaled-down ranches limited to 5 total acres each for cultural history purposes.
6. Investigate, plan, and implement with local native peoples cultural restoration and protection of ancestral Miwok and Ohlone sacred and community lands throughout the Seashore and GGNRA.

Signed, Mark A. Walsh

September 22, 2019

#7223

Name: Vickers, Jeffrey  
Correspondence: Hello,

I'm writing to support the public access and bicycling improvements outlined under Alternatives B, C, D, E, and F. I strongly support proposals that would lead to the planning and implementation of bicycling routes on trails, ranch roads, and pathways throughout the planning area, including but not limited to: 1) a connection between Devil's Gulch and Platform Bridge Road using existing ranch roads, 2) a connection between Bolinas Ridge Trail at Olema Hill and Point Reyes Station to serve as an interim connection for the Cross Marin Trail, 3) a connection between Bolinas Ridge Trail and Five Brooks Stables using existing ranch roads 4) a connection between Drakes Estero and Abbotts Lagoon Trail using existing ranch roads, 5) a connection between Marshall Beach Trailhead and Pierce Point Road using existing ranch roads, and 6) an Estero Trail loop using existing ranch roads. I encourage NPS to collaborate with ranchers and other stakeholders to educate the public and address concerns related to public access on working ranch lands.

The improvements outlined above would enable and encourage me to visit the Seashore more regularly-and by bike, rather than car. I would feel much safer riding in the Seashore and surrounding areas on trails, pathways, and ranch roads, rather than on roads shared with fast-moving vehicular traffic. Bicycling opportunities are currently very limited and fragmented, so any improvements in connectivity and the creation of new loop options would enable me to enjoy more of the Seashore and surrounding areas by bike.

Thank you, Jeffrey Vickers

#7224

Name: Curtis, Janet

Correspondence: The answer is not culling n murdering. Teddy roosevelt relocated elk. I lived in remote oregon and they were thriving. Welfare ranchers are killing horses burros for NO REASON AND ITS ILLEGAL. NO ONE HAS THE RIGHT TO STEAL KILL REMOVE NATIVE WILDLIFE TO PUT DESTRUCTIVE COWS N SHEEP ON THESE LANDS. FED UP IN TOTAL WITH THE ABSOLUTE STUPID IDEA THAT WIPING ANIMALS OUT IS EVER A SOLUTION. WE OPPOSE THIS MASS KILLING OF ELK HORSES BURROS TO MAKE ROOM FOR THE ILLEGAL BLM OR WELFARE RANCHERS THAT BELONG TO US. NOT BLM NOT FWS NOT ANYONE. RUINING EVERYTHING. TRUMP WANTS TO HUNT IN 77 REFUGES.THAT IS A RECKLESS HORRIBLE IDEA. LIKE CANNED KILLING OF OUR ENDANGERED SPECIES. BLM IS SO BRUTAL THE LAUGH AS THEY ABUSE.THEY PUT ARMED GAURDS ON ACTIVISTS. THIS IS ALL SAD ILLEGAL AND WRONGHEADED THINKING. KILLING IS NOT THE ANSWER. AND IT CANNOT HAPPEN!

#7225

Name: Lewis, David

Correspondence: September 23, 2019

GMPA

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

Subject: Review Comments on the Point Reyes National Seashore General Management Plan Amendment - Draft Environmental Impact Statement

Dear Superintendent Muldoon,

## Introduction

Thank you for this opportunity to provide comments on the Draft Environmental Impact Statement (DEIS) for the Point Reyes National Seashore and Golden Gate National Recreation Area North District (PRNS/GGNRA) General Management Plan Amendment (GMP Amendment). We are a multi-disciplinary (Animal Science, Agricultural Economics, Dairy Science, Epidemiology, Integrated Pest Management, Rangeland Ecology, Soil Science, Veterinary Medicine, Watershed Hydrology, and Wildlife Biology) group of UC Cooperative Extension Advisors, Specialists, and Faculty whose applied research and education programs focus on solution development to achieve integrated conservation objectives on working landscapes. As we did in our scoping comments (dated November 30, 2018). We prepared to be a resource and collaborator going forward in the development and implementation of the GMP amendment and offer the following comments to support the GMP Amendments goals, including the opportunity to successfully advance land conservation for multiple and integrated objectives.

## Specific Comments

The following comments are offered to improve the accuracy and adequacy of the DEIS and GMP Amendment, building upon our scoping comments submitted on November 30, 2019 for that same purpose and attached to complement these review comments.

## Diversification and Succession

DEIS agricultural diversification and ranch succession planning elements parallel similar efforts and programs, such as but not limited to Grown in Marin, Kitchen Table Advisors, and California Association of Family Farms. The aims of these efforts are to create pathways for farm and ranch viability and successful handoffs of operations to future farm generations. DEIS goals and its conservation strategies are similar to these aims and the following specific comments are provided to improve these elements within the DEIS so the GMP Amendment is successful.

" Row crop on 2.5 unirrigated acres (DEIS Ch.2, p. 37): Very few crops grown for commercial purposes lend themselves to exclusively dry-farming systems, and even those that do are successful through specialized variety selection, frequent tillage, and highly site-specific conditions such as rainfall and soil type. Some of the most common crops grown without irrigation are also high-acreage crops such as grains, vines and tree fruit - a clear mismatch with the 2.5-acre cap. And to limit this production to only the Ranch Core subzone precludes specific instances wherein Pasture subzone soil and site conditions are better suited for this type of diversification. The draft language suggests that even with available water, any diversification into row crop farming must be dry-farmed in the Ranch Core Zone. Revise language to read, Up to 2.5 acres of row crops would be allowed in previously disturbed areas in the Ranch Core and Pasture subzones.

" Tilling and Seeding (DEIS Ch.2, p. 37): Many commercially grown row crops are not direct sown but transplanted. And in both transplant and direct-sow systems, some measure of primary and secondary tillage throughout the season is typically required. This language suggests that only direct-sown crops are allowed within row crop diversification, and no tillage would be allowed. Revise language to read, Tillage minimization is encouraged, including use of no-till seed drills for direct-sown crops.

" Crop Protection and Wildlife Management (DEIS Ch.2, p. 37): This section suggests that the only form of acceptable protection for crops is fencing, a practice that is ineffective for gophers. This would inappropriately eliminate many common forms of management for row crop pests. Revise language to read, Management of wildlife associated with protection of row crops should adhere to IPM methodology, prioritizing non-lethal methods such as fencing and other forms of exclusion from cropping areas. Any lethal forms of wildlife management as protection for row crops must be identified and approved in the Ranch Operating Agreement (ROA)

" Sales of Local Agricultural Products: Repeated mention is made of sales of local agricultural products in DEIS Ch.2, p. 37, Ch.4, p. 118, 121, 150) and Appendices (Appendix K, p. 75) but explicit lists of Diversification activities and the subzones to which they have been assigned in Ch.2, p.37, Appendix K, p.15-16, Appendix L, p. 15 as well as Draft Sample Lease, Exhibit B, Ranch Operating Agreement make no mention of sales of local agricultural products. This creates confusion as to what the NPS envisions and evaluated when considering diversification on ranches as it relates to on-farm sales of products. The opportunity for members of the public to engage with agricultural operations directly as consumers of local products draws them closer to the regions long ranching history and yields both economic and cultural benefits. Visitors to the park benefit from the direct experience of what ranchers are producing and ranchers benefit from the opportunity to explain their practices and sell the fruits of their labor. Include in any enumerated lists of activities labeled Diversification, Ranch Core Subzone a bullet for Sales of local agricultural products. Also include in Draft Sample Lease Exhibit B and elsewhere throughout DEIS, Sales of Local Agricultural Products among other forms of Diversification to be allowed.

" Public-serving Ranch Activities (DEIS Ch.2, p. 38): Diversification activities authorized in the Ranch Core and Pasture subzones are: &Livestock species, & Public-serving ranch activities that support park goals for interpretation and education (i.e. farm stays, ranch tours) It is unclear whether fee-for-service events such as farm-to-table dinners, pumpkin patches, fundraisers or weddings would be allowed under Public-serving ranch activities. Some may assume that these activities fall under Draft Sample Lease section 4.13 Lessee may neither authorize nor host activities that require a National Park Service Special Use Permit, including organized events and filming activities, upon the Premises without Lessors prior approval and issuance of a Special Use Permit. The distinction between these two categories of public-serving programs needs to be made, including greater clarity around what kinds of events require a Special Use Permit. Revise language to read, Public-serving ranch activities that support park goals for interpretation and education (e.g. farm stays, ranch tours and other forms of agritourism as approved in Ranch Operating Agreement (ROA). Use this language to make consistent throughout Draft EIS and Appendices, Draft Sample Lease, etc. the activities allowed under diversification. Insert language outlining what kinds of organized events stand outside of the allowable forms of Diversification included in Alternative B.

" Livestock Diversification (DEIS Ch. 4, pp.133-134): Ranch Management - Diversification: &only ranches with an occupied residential complex would be authorized to diversify livestock. This statement does not fully agree with Appendix K, 3.2.12.2, p. 16 which restricts chickens in the Pastoral Subzone (up to 500 with up to 3 associated mobile huts) to ranches that have residential occupation but places no restrictions on sheep and goats beyond the caps on AU equivalents. Resolve the difference by allowing diversification of livestock species in the Pastoral Subzone of all ranches, maintaining for all the limitations on numbers based on AU equivalents. This would include the 500-chicken allowance for which the restriction to residentially occupied ranches is arbitrary and without clear cause.

" Succession: The draft and separate Succession Policy referenced in the DEIS uses the phrase immediate family member without a definition, leaving open the question of whether a niece, nephew, grandchild or cousin could join an operation and be added to the lease. In an era where succession for many farm families is unclear, preserving options for bringing in family members to take on leadership roles in the operation is essential. Modify language to read: &Named Lessees on an individual permit, with the agreement of all other current Lessees, may request to add additional family members to that lease/permit.

## Appendix D

DEIS Appendix D - Management Activity Standards & Mitigation Measures, in conjunction with the proposed Permit/Lease and ROA, provides clarity to the options available and the expectations required for NPS staff and leasing ranchers to manage and achieve resource conservation goals, including agricultural operations. The following specific comments, when addressed, will bring additional clarity to the Final EIS and GMP Amendment.

" Number of projects a year (p. D-3): The estimated number of individual projects to be implemented is up to 24 per year Is this the projected total across the entire park? What is the definition of project? Table D-1 delineates activities which, together, might make up a project. Many of these activities, however, are part of ongoing agricultural practices that would be defined in the Ranch Operating Agreement (ROA). It should be clearly understood that while any project may entail multiple activities, the use/implementation of one or more activities listed in Table D-1 would not necessarily constitute a project. In absence of such a distinction, it could be argued

that activities such as Mowing (p. D-4), Integrated Pest Management (p. D-4), Prescribed Grazing (p. D-5) and Forage Production (p. 6) which might be part of every ranch's ROA would count towards the 24-project cap. Insert definition of project to the effect of, Any establishment of a new agricultural practice, built structure or other form of land use not currently in effect on a given ranch.

" Nonlethal Wildlife Control (Table D-11, p. D-51): Use nonlethal wildlife control (i.e. scarecrows or decoys and control garden debris) because lethal control of wildlife is prohibited. Use of traps and raptor boxes are common forms of integrated pest management to control gophers, voles and other burrowing rodents that threaten row crops. Exclusion via underground fencing is not viable beyond a garden scale, but the wording in this section leaves few other options. Revise language to read: Prioritize whenever possible nonlethal wildlife control (i.e. scarecrows or decoys and control garden debris). Any lethal forms of wildlife management as protection for row crops must be identified and approved in the Ranch Operating Agreement (ROA)

" Cover Crop and Mulch (Table D-11, p. D-51): Plant cover crop or cover soils with straw mulch (until April 1) The exact timing of cover crop termination is a delicate balance between crop maturity, soil and air temperatures and soil moisture. Prescribing a date upon which cover crops must be terminated sets an unrealistic expectation and does not allow sufficient flexibility to respond to conditions. Additionally, many farms are using other forms of mulch besides straw to stop erosion and halt weed growth in fields during the rainy season. The prescription to use straw mulch is overly specific and closes the door to new methods. Revise language to read, Plant cover crop or cover soils with mulch and use at least 30% cover in fallow crop areas throughout the rainy season.

" Tilling Activities (Table D-11, p. D-51): For row crop diversification, conduct tilling activities row crop areas, as well as ripping, disking, or harrowing, after August 20 and before the first rains or November 1. Tillage associated with row crop production occurs at different moments during the season for different purposes. Primary tillage associated with preparing fields for planting in spring (disking, listing, rototilling, spading, etc.) would all take place outside of the August-November window; as would some secondary tillage associated with cultivating fields to control weeds and recycle planting areas. The dates listed here may be intended for field preparation for cover-cropping, but create an unworkable expectation for other forms of necessary tillage. Revise language to read, For row crop diversification, conclude tilling activities in row crop areas prior to first significant rains or November 1, whichever comes later.

#### Lease/Permit Template

The following table provides detailed questions and comments to clarify points in the draft PRNS and North District GGNRA Agricultural Lease/Permit and Ranch Operating Agreement. In addition to including this template formally within the Final EIS and GMP Amendment, the Lease/Permit and Ranch Operating Agreement will be improved to facilitate achieving the National Park Services goals and conservation strategies for the GMP Amendment.

#### Item/Section Text Implication Revision/Modification

1.9.2 (p.4) Hazardous Waste is defined as any material or substance that is or becomes defined as a "hazardous waste," "extremely hazardous waste," "restricted hazardous waste," "hazardous substance," "pollutant," "discharge," "waste," "contaminant," or "toxic contaminant" under any Environmental Requirement, or any above-ground or underground storage containers for the foregoing

The definition of Hazardous Waste would include manure and other dairy wastewater, but while 26.1.1 allows Lessee to bring, use, handle, generate, treat, keep or store [Hazardous Materials] in compliance with all Applicable Laws and as approved in writing by Lessor., 26.1.2 forbids Lessee to release, discharge or dispose of any Hazardous Materials. This sets up a conflict between the generation of waste and the discharge/disposal of it via manure spreading and/or sprinkling of water on pasture from manure lagoons.

This conflict could be resolved with the addition of the following to 26.1.2: &except where allowed in Applicable Law and as outlined in Ranch Operating Agreement (ROA)

Additionally, the TBD language in 15.1 regarding the Waiver of Waste discharge Requirements for CAFs should make clear that these waivers are a method of providing oversight and regulatory compliance for both the storage and discharge of waste.

4.1 (p.8) &For Leases where residential use is authorized, Lessee agrees to use the Premises as the principle residence (as defined by the Internal Revenue Service) of at least one of the undersigned Lessees throughout the entire Term of the Lease. This seems to preclude the possibility that a ranch could dedicate all housing to employee housing. It is unclear throughout Draft Lease and Draft Sample EIS as a whole whether employee housing is treated as a residential use and so fundamental to the terms of the lease or if the establishment of employee housing could be allowed through the ROA process alongside other Improvements or Alterations, bringing housing for agricultural workers to sites where none currently exists. Add language to Draft EIS and Draft Sample Lease clarifying:

1. Whether Section 4.1 of the Draft Sample Lease could be satisfied by the use of residential buildings as principle residence by employees of the Lessee
2. Whether employee housing units would be allowed beyond the 18 ranches for which residential occupation is currently authorized, perhaps by classifying the use of manufactured housing for employees as a form of Improvement or Alteration.

18.1 and 18.2 p.14 Lessee shall not provide any rancher worker housing on the Premises except as authorized in the ROA, including in manufactured housing units that are Lessees Personal Property. As Diversification activities are created/expanded, so, too, will the need for employee housing. Provisions in the Draft Sample Lease assert that manufactured housing would be treated as a personal property belonging to the Lessee but make no reference to how many and on what grounds new units would be allowed within a ranchs Ranch Core Subzone. Additionally, there is no mention of any evaluation of the impacts from necessary accompanying work of upgrading/installing septic systems and domestic water systems. Add language to Draft EIS and Draft Sample Lease clarifying:

1. By which means limits would be set on the number of housing units (or housed employees) that a ranch would be allowed.
2. By whom additional infrastructure to support rancher worker housing (septic, water) will be approved and paid.
3. Include language that these costs could potentially be paid via maintenance reserve accounts

4.13 p.9 Lessee may neither authorize nor host activities that require a National Park Service Special Use Permit, including organized events and filming activities, upon the Premises without Lessors prior approval and issuance of a Special Use Permit. Neither Draft EIS nor Draft Sample Lease indicate what circumstance/set of circumstances would trigger the need for an NPS Special Use Permit. Is this something acquired separate and outside of the once-annual ROA process? In absence of a definition of the Special Use Permit and the kind of organized event that necessitates one, confusion arises around some forms of Diversification described in Appendix K 3.2.12.1 such as ranch tours which are authorized through the ROA. Add language to Draft EIS and Draft Sample Lease clarifying when and how an NPS Special Use Permit must be acquired. Distinguish this process in substance, form and timing from the ROA negotiation process.

6.1 p.10 Regarding rent, Draft Sample Lease states:

Note: There is no draft lease language for rent at this time because the formula for determining fair market rent will be determined through an appraisal conducted under the Uniform Standards of Professional Appraisal Practice adopted by the Appraisal Foundation. NPS anticipates that lease rental rates will allow for annual adjustments so that rents remain consistent with market conditions. Lease rent rate is based on an appraisal of fair market rent - but market rates are notoriously inappropriate indicators of value on agricultural lands for which use is restricted to agricultural activity, from which extractable value is limited to agricultural enterprise. Additionally, it is not clear whether/how lease rates will be adjusted every year to reflect changes in ROA. This complicates a ranchs calculation to diversify their operation if they cannot know in advance whether/how their lease will change with the addition of new livestock, product processing, etc.

Additionally, Ch. 2, Alternatives, p.37, under the heading Appraisal Process, it is stated, Under alternative B, rather than individual appraisals, NPS anticipates development of a master appraisal process managed by the US Department of the Interior to determine FMV for park ranch operations. Because ROAs potentially change annually, independent of neighboring ranches, it is unclear how a master appraisal process would treat individual ranches that add diversification or make other changes to the operation.

Make explicit the relationship between appraisals, Ranch Operating Agreements and lease rent rate in terms of frequency and degree of change.

14.2 p. 13 Lessee acknowledges that wildlife may cause occasional damage to fences, ranching structures, livestock, forage and Lessee's personal property and agrees to seek no reimbursement or other compensation therefore. The establishment of a maintenance reserve account is mentioned in several places, but the purpose of these accounts is typically paired with maintenance of ranch buildings. No mention is made of how ranches will cover costs associated with damage to infrastructure, etc. caused by wildlife. Descriptions of maintenance reserve accounts should state explicitly that funds will be available to ranches to pay for damage to infrastructure and compensate for lost forage due to wildlife.

16.2 p.14

21.2 p.18 If Lessee desires to undertake any Diversification Activities, &or use any pesticides, Lessee shall notify NPS at least 30 days in advance of the annual ROA meeting referred to in Article 4 of this Lease and provide a brief, written description of the activity. Pesticide is, as defined in California state law is Any substance, or mixture of substances which is intended to be used for defoliating plants, regulating plant growth, or for preventing, destroying, repelling, or mitigating any pest & which may infest or be detrimental to vegetation, man, animals, or households, or be present in any agricultural or nonagricultural environment whatsoever.

The breadth of this definition means that many commonplace substances would qualify as a pesticide and, as such, require a rancher to report to NPS. Herbicides, both organic and conventional are only one example.

Having only one window in a year to gain approval of a pest-management practice is insufficient to allow a rancher to respond to changing conditions across the four seasons. As diversification on ranches increases to include row crops and small-scale processing, the complexity of managing pests increases. Language regarding pesticide use should be removed from references to ROA and 16.2 should be amended to read:

Lessee shall notify Lessor of any use of pesticides by the 10th day of the month following application. All uses of pesticides must comply with Applicable Laws including reporting and certification requirements.

Exhibit B, Ranch Operating Agreement

7.2, p. 36 Hay may only be produced for cattle owned by Lessee that are authorized under the terms of the Lease. On ranches that opt to diversify livestock to include sheep or goats or even horse boarding, the ability to grow hay for their feeding is both sensible and efficient. However, the use of the word cattle in 7.2 implies that this may not be allowed. Change the word cattle to livestock.

Exhibit B, Ranch Operating Agreement

11.2, p. 38 Pesticide application work must be supervised by a person licensed or certified in the use of the approved pesticides Under state law, no license or certification is required for a rancher to apply pesticides on their own land. These criteria are only required when applications are conducted by an employee of the operation. Revise the language to read, When required by Applicable Law, pesticide application must be supervised by a person suitably licensed or certified in the use of the approved pesticides.

Exhibit B, Ranch Operating Agreement

8, p. 37 Lessee is authorized to undertake the following types of Ground Disturbance& Absent a definition of Ground Disturbance, many basic activities associated with agriculture could be assumed to be Ground Disturbance and, as such, be hindered by the once-annual ROA negotiation process.

Use of keyline plow, subsoiler or other similar practice for improving soil health in pasture and rangeland could be mistaken for Ground Disturbance. Routine scraping of ranch roads to fill potholes and level bumps could be mistaken for Ground Disturbance. A formal definition for Ground Disturbance should be established. Marin County code established a threshold of 250 cubic yards for amount of soil moved as the trigger for its Grading Permits. Something like this would help ranchers distinguish between routine agricultural activity and things which must be delineated and approved in the ROA.

## Soils

The DEIS in preparing the Soils sections in Chapters 3 and 4 used the United States Department of Agriculture Natural Resource Conservation Service (USDA-NRCS) Soil Survey interpretations to restrict land use decisions rather than to guide management decisions. Soil Survey interpretations such as compaction resistance and erosion hazard rating are limited by the data that is collected by the soil survey. This data is not always the essential data that accurately explain a soils behavior. For example, while using the NRCS soil compaction resistance interpretation is convenient, it fails to capture the most important property that governs susceptibility to soil compaction, which is soil moisture. Soils are most prone to compaction when they are wet. Thus, careful

management of stocking rates, stocking density and timing of heavy traffic can avoid compaction. NRCS interpretation does not use soil moisture as an intrinsic property because soil survey does not monitor soil moisture. The compaction interpretation uses soil properties that have a secondary influence on compaction: texture, structure, rock fragment content, bulk density and organic matter content. Thus, it is a good indicator of relative differences in susceptibility to compaction among soils, but it is a poor indicator of the actual risk to compaction. Moreover, it does not link to any specific stocking rates or management goals.

A similar problem is associated with erosion hazard. The approach to risk or adverse impact on soil is faulty in the DEIS because it is based on the USDA-NRCS erosion hazard rating. This rating considers slope and K factor, but it does not use cover. Thus, erosion hazard is a relative interpretation of the intrinsic erodibility of bare soil on different slopes. It does not reflect the reality of anchored soil by vegetative cover. A recent study showed that grazing has minimal impact on soil erosion in California because plant cover is exceedingly high, even under high grazing scenarios (Salls et al., 2018). Moreover, soil survey in describing the erosion hazard rating states, The soil loss is caused by sheet or rill erosion in off-road or off-trail areas where 50 to 75 percent of the surface has been exposed by logging, grazing, mining, or other kinds of disturbance. The extent of this amount of bare-soil condition is limited to very few instances of high-use. The DEIS scales this up to reflect hundreds or even thousands of acres, which is not correct and in the instance of cattle trails is no different than that of human trails which the DEIS suggests are fine.

Similarly, the use of wind erodibility to livestock trails is also questionable given that the wind fetch is extremely low. Wind erodibility on agricultural fields must be judged relative to the timing of the unvegetated surface. If bare dry soil exists then wind erodibility is high, however, if bare soil is moist wind erodibility is exponentially lower. This again limits the applicability of soil survey interpretations as a risk assessment.

None of the USDA-NRCS erosion hazard ratings suggest that management should be removed as mitigating action. Rather it is suggested that careful management is needed on erodible land. One possible exception is the most restrictive instance of this interpretation very severe, described in soil survey to have the most conservative actions: loss of soil productivity and off-site damage are likely, and erosion-control measures are costly and generally impractical. Only 13% of the planning area is rated very severe with the high likelihood that this land is too steep for any management activity that would remove over 50% of the vegetative cover. Thus, any hypothetical change to land use within the planning area is likely to have no effect on soil erosion assuming ranchers use careful management such as prescribed grazing practices that meet residual dry matter targets. Unfortunately, the DEIS grouped severe and very severe classes into one class, a questionable decision given that severe ratings simply require careful management.

It is not clear how the acreage of high-intensity-use areas was determined. First paragraph on page 104 suggests 150 acres within grazing areas associated with trails, salt licks trough areas etc. This number may be smaller depending upon the inclusion or exclusion of animal concentration areas. It is difficult to quantify the spatial extent of these localized areas accurately. Moreover, the soil survey cannot be used at such a fine scale, thus we have no way of knowing how susceptible the soils are to compaction at these localized scales, making it difficult to use them to make statements and conjecture that suggest long-term adverse impacts on soils.

The DEIS assumes that there has been or will be soil degradation because of activities that are on what are perceived to be susceptible soils. There is no proof that many of these activities adversely affect these soils, with the exception of animal concentration facilities. The DEIS does not explain how soil survey data was aggregated. This is important because soil survey does not delineate individual soils but multiple soils that comprise a map unit. It appears in some cases that the DEIS pushes the limits of scale in terms of the questions soil survey can answer. Moreover, they do not explain how soil survey data was aggregated to report interpretations e.g. dominant soil component, dominant condition, spatially weighted average, most limiting condition etc. Soil Survey interpretations are not meant to restrict land activities. They are intended to guide careful management. In some instances, across the country highly erodible lands have been excluded from activities that could accelerate soil erosion. This is typically focused on removing land from cultivation. There is no evidence that careful grazing practices in California leads to adverse soil impacts, yet these statements persist in the DEIS. The result is a document that reads with an extremist view on the effects of management on soil.

The Final EIS and GMP Amendment will be improved and support achievement of the NPS goals and conservation strategies by revising its use of the USDA NRCS Soil Survey to the appropriate scale and to guide management practice decisions instead of restrict land use for the specific items mentioned and others where the DEIS relies upon the soil survey.



## Air Resources

The DEIS Executive Summary appropriately contextualizes the planning area air resources stating, While emissions of criteria pollutants and greenhouse gases would vary among alternatives, these emissions would continue to be a small contributor to overall impacts when compared to emission sources and transport of emission from outside the planning area (page ix). Additionally in Chapter 3 the DEIS explains &most deposition sources likely affecting the park come from sources outside park boundaries&(page 96). These points should be strengthened in the Final EIS by placing the planning area Greenhouse House Gas (GHG) emissions inventory within inventories for Marin County and California as requested in the attached scoping comments.

Adding to this context, the Final EIS will improve the context for the impacts and mitigation of air quality by accounting for carbon sequestration in agricultural soils relative to emissions estimates. The point here is to analyze and present the level of balance that currently exists in the planning area to inform the scale of mitigation that is even possible. Additionally, there have been modifications to the use of global warming potential of different GHGs referred to as GWP\* (Allen et al., 2016). Using these will improve the accuracy of analysis and management recommendations within the Final EIS based upon cumulative and short-lived climate pollutants. Lastly, the DEIS statement &NH<sub>3</sub> emissions can contribute to visibility impairment and to harmful ecosystem impacts from excess nitrogen deposition (page 93) is true and deserving of additional context. This occurs when a nitrate particulate is formed. It is important point that this is a reversible reaction. It is not clear if planning area conditions year-round would lead to this reaction. The resulting nitrate particulate is from gas engines, meaning both ammonia and car or engine exhaust are needed in the same place for the reaction to occur. The Final EIS must explain the potential for the reaction to occur instead of implying that all ammonia would form particulate nitrate and impact visibility.

## Appendix I

With the case study examples now available in the DEIS Appendix I, a complete peer-review of R Forage ( ) to Predict Rangeland Residual Dry Matter (RDM) is warranted to assure that the model and its outputs are addressing the intended objectives and contributing to achievement of the GMP Amendment conservation strategies. This could even provide a conceptual framework for the grazing use, overlap, and competition between livestock and elk that would the development and use of a forage model. It will provide NPS with technical support beyond assumption confirmation early in model development. It would also help bring clarity to the question or questions being asked as the impetus for creating the model. It would also be instrumental to facilitate the use of other existing data in the planning area including measured forage production and residual dry matter and authorized animal units. Lastly, it will help to resolve confusion in the application of terms and concepts applied in the model, including needed differentiation and definition of RDM, forage production, and consumption. For, example winter or spring estimates of RDM are contrary to the concept of RDM as a measure of material left at the end of a grazing year when it is dry and hot (typically measured in August or September). This is one example of where concepts are not clearly applied or described in Appendix I, giving rise to questions about the assumptions and the purpose of the model. Conducting a complete peer-review will improve the model and description in Appendix I by pointing out these questions and providing revisions to the model purpose and structure.

## Closing

Thank you again for the opportunity to support the NPS and community stakeholders with our scoping comments (attached) and now with our DEIS review comments. We will continue to be a resource for research-based information and a constructive partner for the development and implementation of the Final GMP Amendment.

Respectfully,

David J. Lewis

## Attachments

Scoping comment letter dates November 30, 2018.

## References

Allen, M.R., J.S. Fuglestedt, K.P. Shine, A. Reesinger, R.T. Pierrehumber, and P.M. Forster. 2016. New use of global warming potentials to compare cumulative and short-lived climate pollutants. *Nature Climate Change* volume 6, pages 773-776.

Salls, W.B., R.E. Larsen, D.J. Lewis, L.M. Roche, D.J. Eastburn, A.D. Hollander, M. Walkinshaw, S.R. Kaffka, K.W. Tate, and A.T. Ogeen. 2018. Modeled soil erosion potential is low across Californias annual rangelands. *California Agriculture*, V72(3):179-199.

November 30, 2018

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

Subject: Point Reyes National Seashore General Management Plan Amendment - Draft Environmental Impact Statement Scoping Comments

Dear Superintendent Muldoon,

## Introduction

Ranching and dairy farming on the Point Reyes National Seashore (PRNS) and Golden Gate National Recreation Area (GGNRA) is the next opportunity to achieve the shared benefits and integration of working landscapes and land conservation. Conservation that increasingly is successful in protecting and improving soil, water, and habitat quality and simultaneously contributing to a stronger local food system and economy. This opportunity was made possible by decisions and agreements made nearly 50 years ago to establish PRNS and GGNRA. During that half a century, the science and practice of conservation has advanced. The following comments, organized by potential impact topics, are offered to convey this science for application in the Environmental Impact Statement (EIS) analysis of the General Management Plan Amendment (GMP Amendment) and during future implementation to assist the National Park Service (NPS) staff and PRNS and GGNRA ranchers and farmers to be successful in the protection of cultural and natural resources.

## Specific Comments

### Air Quality

" The EIS analysis should include the larger context of greenhouse gas (GHG) emissions for all activities within the planning area. This context and the methods used are important for apportioning individual sector contributions. For instance, well-defined and accepted methods for estimating emissions from livestock production and agriculture are under development by the United Nations Food and Agriculture Organization and in use, such as the National Air Quality Site Assessment Tool (NAQSAT, 2018). Additionally, estimates of livestock agriculture contribution to GHG emissions is 18% globally (FAO, 2006), less than 3% for the United States (EPA, 2009) and California (CEC, 2005; Pitesky et al., 2009), and 5% for Marin (ICF International, 2015). Using tools designed purposeful to estimate agricultural emission, presenting a comprehensive context for all

planning area GHG emissions, and reconciling the GMP amendment estimate with these other inventories will strengthen the EIS focus on the largest sources of GHG emissions and facilitate realistic goal setting for reductions and mitigation across all relevant sectors.

" The EIS should analyze agricultures potential as a formal and active partner in emission calculations, goal setting, and developing and implementing practices to obtain goals similar to Yolo County, California Climate Action Plan. This analysis should include the climate benefits already realized in dairy (Capper et al. 2009) and beef cattle (Capper 2011) production over the last five decades, and accounting for PRNS and GGNRA farms and ranches being pasture based and grass-fed operations with documented reductions in emissions relative to other systems (Obrien et al. 2014). Similarly, the EIS analysis will be improved by the inclusion of reductions in GHG emissions from nutrition and feed modifications (USDA, 2004), manure storage and handling (Mitleohner et al, 2009; Owen and Silver, 2014), and land management strategies (Lal 2007) among other options. Lastly, it will provide planning area NPS Staff and farmers and ranchers with the tools to increase their resiliency to climate change.

" Analysis in the EIS should include mitigation through carbon sequestration. The voluntary goal for emission reduction through methane capture technologies on Marin dairies is estimated at 4,638 (MTCO<sub>2</sub>e) countywide (ICF International, 2015). Currently, Marin farmers and ranchers are voluntarily implementing carbon farming programs and practices in collaboration with industry member associations and partners. This includes the Marin Carbon Project and carbon farm planning and the California Department of Food and Agricultures Climate Smart Agriculture and Alternatives for Methane Management Program, all of which should be considered and analyzed in the EIS. Conservative estimates of the amount of potential carbon sequestration from compost application, just one of 32 identified climate beneficial practices being implemented, are 10 to 100 times greater than methane capture and emission reduction goal (Ryals and Silver, 2013). Expanding the EIS to include sequestration is critical for a comprehensive plan that will make beneficial and lasting contributions to GMP Amendment goals.

## Rangeland Management and Ecosystem Services

" The EIS should analyze the contributions to ecosystem services that can be made through documented effective grazing and rangeland management. Californias annual grasslands are one of the worlds major biodiversity hotspots, supporting thousands of plant and animal species. These lands also provide a critical economic foundation for rangeland livestock production and cultural heritage in the state (Roche et al. 2015). An extensive body of scientific literature has demonstrated that through active stewardship and conservation, land managers can manage for agricultural production and a diversity of other ecosystem goods and services across these working landscapes. Managers can use prescribed grazing (the controlled implementation of timing, frequency, and intensity of grazing) as a tool to support and enhance multiple agricultural and conservation goals (Briske 2011a)-including biodiversity, wildlife habitat, and grassland health.

Large-scale weed invasion is a major threat to both conservation and agricultural goals on annual grasslands. Invasive weeds can significantly reduce rangeland health by inhibiting biodiversity, depressing forage productivity and quality for both wildlife and livestock, and depleting soil water resources. Proper grazing management can maintain or enhance grassland diversity and productivity (Gornish et al. In Press). Managed grazing can be used to target specific weeds, particularly as part of a long-term integrated pest management program. The most critical components of a prescribed grazing program for weed management are timing and intensity of grazing (Davy et al. 2015). Target weeds must be grazed during their most biologically susceptible stages. Using appropriate grazing timing and intensity can reduce undesirable weeds and increase desirable species and ecosystem productivity. Californias grasslands provide habitat connectivity, which is critical for annual migration of many wildlife species. These lands also support important foraging and nesting habitat for wild pollinator populations, which provide critical pollination services. Livestock grazing, via appropriate and sustainable management strategies, can be used to maintain or enhance herbaceous plant diversity. For example, grazing has been shown to enhance Californias unique vernal pool habitats by controlling exotic annual plants and enhancing herbaceous plant diversity, which can lead to longer pool inundation periods benefiting a diversity of aquatic species, including endangered species such as the California tiger salamander (Huntsinger and Oviedo 2014).

Grazing has also been shown to reduce accumulation of thatch. Excessive amounts of thatch cause shading and reduces near surface temperatures, which suppresses germination and emerging seedlings. This in turn reduces species richness (Bartolome et al., 2007; Eviner, 2016).

Including researched and confirmed grazing management methods and the resulting beneficial ecosystem services and goods that result in the EIS analysis will contribute to successfully achieving the GMP Amendment goals on range and pasture portions of the planning area.

#### Socio-economics

" In conducting the EIS analysis, careful consideration and attention is required in deciding the geographic area and the primary impact or direct effect inputs of any socio-economic analysis to accurately model the economic benefits of each alternative. The goal of socioeconomic analysis is to use a well-established methodology to quantify the benefits and costs borne by society under a given set of scenarios. While socioeconomic analysis encompasses several different types of analyses concepts, the most common concept applied when considering alternative situations like the General Management Plan Conceptual Alternatives is cost-benefit analysis. While the concept is simple - compare the net present value of expected future benefits to the present value of estimated future costs - the practitioner designing the economic modeling faces many complex decisions that will influence the results. To reduce some of the discretion and uncertainty associated with these decisions, many economists and consultants providing economic impact analysis use the widely-adopted, input-output modeling database IMPLAN (Impact Analysis for Planning Model).

The IMPLAN model is widely used in economics, planning, and engineering studies to account for interrelationships among sectors and institutions within regional economies and to ultimately ascertain full economic impacts of injections or withdrawals of regional economic activity. California and Federal agencies that have utilized the IMPLAN model include: California Department of Water Resources, State Water Resources Control Board, U.S. Army Corps of Engineers, U.S. Bureau of Economic Analysis, and U.S. Bureau of Land Management. IMPLAN constructs social accounting matrices for a given geographic area (usually a county, group of counties, or state) based upon actual business transactions in the area for a given sector (e.g., beef production, dairy production, etc.) that enable researchers to observe the full economic impact in the area. Thus, practitioner decisions of the geographic area included in the analysis will be a driver of the model outcomes.

The researcher also must determine the primary impact or direct effect of the scenario to input into the IMPLAN model. The primary impact is the monetary change that results from the policy implementation or scenario being analyzed. Based on the primary impact, IMPLAN generates secondary impacts of two types: Indirect impacts are determined by the amount of reduced spending, under each scenario, on supplies, services, labor, and taxes due to the primary impact. The induced impact of the project accounts for the reduction in spending in the area from the indirect impact, as some portion of that income would have been spent within the geographic region. The magnitude of both indirect and induced impacts are determined by the degree to which income leaks from the local economy by being spent outside its defined boundaries.

#### Soil Health

" Analyze as part of the EIS the soil quality drivers and the effectiveness of livestock management and conservation practices to improve soil quality and health in grazing livestock operations settings. Key soil processes that affect the sustainability of rangelands include compaction, runoff and erosion. Grazing management that improves soil health results in a series of interconnected positive outcomes, including: 1) soil bulk densities and soil structure that allows root and water penetration of the entire profile; 2) vigorous plants with capacity to develop and maintain extensive rooting systems; and 3) stable, resilient increases in primary productivity both above- and below- ground. These outcomes are of course strongly dependent upon site specific factors such as grazing intensity and timing, soil resilience to compaction, and precipitation. A recent comprehensive analysis found that reduced grazing intensity (e.g., moderate vs. heavy grazing intensities) improved soil health metrics; additionally, the analysis revealed that rotational grazing strategies reduce compaction and increase soil carbon relative to continuous grazing strategies, suggesting that rotational grazing could create climate change mitigation opportunities over continuous grazing (Byrnes et al. 2018). Additionally, a statewide study in California annual rangelands using the Revised Universal Soil Loss Equation (RUSLE) model suggested that erosion is low in most settings if recommended residual dry matter targets are obtained (Salls et al. 2018).

#### Water Quality

" Analyze as part of the EIS the water quality drivers and the effectiveness of livestock management and conservation practices to improve water quality in range livestock operations settings. The primary drivers of water quality degradation by range livestock are 1) excessive livestock numbers relative to site resiliency to negative livestock impacts to vegetation, soil, and hydrology; 2) livestock preference to inhabit critical hydrologic zones, thus disproportionately concentrating negative impacts and waste in these sensitive areas. Range management practices and strategies which directly and indirectly act to mitigate these drivers will lead to water quality improvements, a conclusion which is well supported within the research literature and by practice adoption by ranchers and range managers.

Briske (2011a) recently lead a comprehensive scientific review of the conservation effectiveness of all range management practices funded through United States Department of Agriculture (USDA) conservation initiative programs (e.g., Environmental Quality Incentive Program, EQIP). In this review, Briske et al. (2011b) and George et al. (2011a) conducted a research synthesis to address specific hypotheses about the effectiveness of stocking rate moderation, grazing system selection, management of timing of grazing and rest from grazing, as well as a suite of riparian management practices to improve hydrologic function and water quality. The authors determined that 1) setting site specific moderate stocking rates is an essential practice to sustain hydrologic functions and minimize soil erosion and pollutant transport; 2) simple seasonal-rotation grazing systems at moderate stocking rates result in improved upland soil hydrologic function compared to intensive rotational grazing systems at higher stocking rates or livestock densities; 3) management of timing and intensity of grazing and rest can improve riparian vegetation composition and structure, hydrologic function, and water quality; 4) livestock distribution practices, such as drinking water developments, supplement feed placement, and herding, are effective means of reducing livestock residence time and impact in riparian zones; 5) practices that reduce livestock densities, residence time, and waste loading in riparian areas and stream flow generation areas can reduce nutrient and pathogen pollution of surface waters; and 6) riparian vegetation can substantially filter waterborne pollutants from runoff, but the implementation of optimally efficient riparian buffers must incorporate site-specific biophysical factors such as flow regime and soil type.

Similar summaries on the factors and benefits of conservation approaches and practices to manage water borne pathogens in agricultural watersheds have been completed by the USDA Natural Resources Conservation Service (Atwill et al. 2012) and the World Health Organization (WHO 2012). These summaries present the considerable amount of research conducted on the efficacy of beneficial management practices (BMPs) for both extensive (i.e., cow-calf rangeland grazing) and intensive (i.e., dairy farms) livestock production systems to reduce microbial contamination from these facilities. These on-farm BMPs typically rely on several common strategies that endeavor to be practical, affordable, and adoptable, such as the strategic use of vegetative buffers between grazing sites and adjacent bodies of water, riparian exclusion to livestock grazing several months prior to and during the rainfall season, adequately storage time and drying of manure solids prior to land application, vegetating or use of straw to cover the surface of cattle loafing areas during the rainfall season, and appropriate setback distances between sites receiving manure solids and adjacent down slope bodies of water.

These international and national summaries are complemented by corresponding water quality management endeavors and evaluation in the Tomales Bay Watershed, including the GMP amendment planning area. Water quality results on working dairies and ranches confirmed that extensively grazed management units had indicator and nutrient concentrations similar to reference ambient conditions (Lewis et al. 2005). Building upon these findings, investigation of measures and practices to improve water quality in surface runoff from high use areas and pastures that receive manure confirmed that a suite of practices, including implementation of buffers, treating surfaces with mulch and seeding, applying manure in advance of runoff producing storms, and applying aged manure provide producers tools to successfully reduce pathogen loads (Lennox et al. 2007; Lewis et al. 2009; Lewis et al. 2010; Miller et al. 2007; Miller et al. 2008). In the Olema Creek Watershed, the NPS staff and PRNS/GGNRA ranchers have implemented livestock management methods and 48 conservation practices from 1998 to 2017, with implementation continuing beyond this period. Simultaneously, the NPS has monitored water quality in Olema Creek. Analysis of the water quality results confirms a significant reduction in indicator bacteria concentrations (Voeller et al. 2018).

" Include in the EIS analysis the progress and beneficial impacts made and to-be made through the planning and implementation of water quality improving conservation practices on dairies and grazing cattle ranches. PRNS and GGNRA ranchers and farmers and NPS staff have participated in and contributed to both the California Dairy Quality Assurance Program (Meyer et al. 2019) and the Californias Rangeland Water Quality Plan (Larson et

al. 2005; George et al. 2011b). These education and planning programs have led to the implementation of conservation practices through state and federal funding programs and in partnership with financial and technical assistance organizations including the Marin Resource Conservation District and the Natural Resources Conservation Service. Incorporating in the EIS analysis the momentum and progress made from these education and implementation program partnerships will facilitate the GMP Amendments future success to protect and improve water quality.

## Wildlife Interactions

" Include in the EIS analysis the increasing understanding of interactions and management solutions for livestock grazing and wildlife compatibility. Ranching and wildlife have coexisted for centuries. The key has always been proper stocking rate and grazing intensity to ensure that negative impacts from grazing do not occur to the grassland ecosystem. In fact, livestock grazing often provides valuable benefits to ecosystems and wildlife through their removal of dead and decadent forage. This vegetation removal stimulates new vegetative growth, opens up canopies for access to food resources previously inaccessible to many wildlife species, and helps to manage invasive weed species (Wolf et al. 2017).

" Include in the EIS the specific interactions and conflicts between elk and cattle, including the need for additional study and adaptive management to reduce or remove conflicts. Understanding the interactions between cattle and elk is essential in the assessment of impacts from allowing any co-habitation of the two species. Few studies have assessed compatibility of beef cattle and elk and none have evaluated those interactions between elk and dairy cattle. Elk and beef cattle diets show considerable overlap, with 42% overlap observed in Colorado (Hansen and Reid, 1975) and 46% in Nevada (Beck and Peek, 2005). While these results were not with tule elk and cattle diets they provide useful context. Additionally, tule elk home range is approximately 536 acres (Cobb 2010) to 1037 acres (Gogan 1986), small compared to other North American elk. An overlap of this home range and diet poses a significant constraint for PRNS dairymen, which are organic certified, requiring cows to meet 120-day, 30% dry matter intake minimum from pasture for organic certification (Rinehart and Bairer, 2011). Elk grazing during the same period that dairy cattle are required to meet nutritional regulations presents management conflicts from forage competition. Compensating dairy producers for loss of pasture forage does resolve the conflict of losing organic certification if dairies cannot meet the standards required of them.

Elk and beef cattle have been reported as socially compatible (Wallace and Krausman, 1987), potentially influencing the amount of time elk spend grazing cattle pasture. Beyond the impact this has on consuming important forage for cattle, it may also lead to dangerous interactions during the elk rutting season, where cattle may become involved in aggressive reproductive interactions leading to injury. While elk tend to use more aggressive threats than injury-resulting physical aggression on other elk (de Vos et al., 1967), no research has been conducted to determine how dairy cattle react to these situations and the associated risks. Injury, and potentially death of cattle, are economic losses to ranchers and farmers, both immediately from veterinary bills and long-term from loss of future production and income.

To reverse the severe decline and near extension in tule elk from the California Gold Rush and other impacts, twenty-one groups have been relocated from reserves to open lands resulting in a statewide population of 3800 (CDFW 2014a). By 1987, at least twelve of the states relocated elk groups had significantly damaged private property (CDFW 2014b). This includes frequent and routine damage to fences and other ranching infrastructure. Johnes positive cattle herds experience an economic loss of nearly \$100 per cow from production losses and increased cow replacement costs (Ott et al., 1999). Further, if cows are showing symptoms of Johnes disease at culling, this cost increased to nearly \$200 per cow. The free-ranging elk herd within PRNS is considered a Johnes positive herd and creates the risk to spread this disease to cattle, both dairy and beef that are considered Johnes free herds. If elk herds in the planning area continue to grow they will increase their ranging area and come into contact with cattle herds more frequently and with herds not yet intermingling with the elk. This presents a real economic concern, as some herds within PRNS are considered Johnes free through testing and may become Johnes positive through this mingling.

Recognizing the impacts presented by the interaction of elk and cattle, the gaps in knowledge about them, and being prepared to adapt management measures to relieve them in the EIS, will contribute to a GMP amendment that is better prepared to manage the conflicts between cattle and elk going forward.

## Closing

These comments have been developed by a multi-disciplinary (Animal Science, Agricultural Economics, Dairy Science, Epidemiology, Integrated Pest Management, Rangeland Ecology, Soil Science, Veterinary Medicine, Watershed Hydrology, and Wildlife Biology) group of UC Cooperative Extension Advisors, Specialists, and Faculty whose applied research and education programs focus on solution development to achieve integrated conservation objectives on working landscapes. The group is prepared to be a resource and collaborator going forward in the development and implementation of the GMP amendment and offers these recommendations and references to support the GMP Amendments goals, including the opportunity to successfully advance land conservation for multiple and integrated objectives.

Respectfully,

David J. Lewis

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#7226

Name: Köneke, Jasmin

Correspondence: I'd like to urge you to adopt alternative F regarding the matter of tule elk at Point Reyes National Seashore in order to discontinue farming and ranching use of the land. The Preservation of endangered wild species and thereby taking care of the given unique ecosystem and, on a bigger scale, sustainability, must take precedence over farming and ranching opportunities, which would inevitably have negative effects the land as a common good. Grazing of productive livestock, especially in large numbers as given in case of the alternative B and intensive mass farming, is known and proven to contribute to water pollution, the spreading of invasive species and with them of diseases, all of which ultimately harm native species such as the tule elk. It is, however, vital for the given ecosystem, not to mention its symbolic cultural value. Now is the time to make decisions in favor of this endangered species and to put them first before other seemingly-profitable interests, whose benefits would be of very short wile.

#7227

Name: Tornatzky, Lynette

Correspondence: I was in high school 55 years ago when I first started writing letters to try to save the Tule Elk. It took years of letter writing by many of us, but it happened, we saved them. This proposal to cull elk in favor of grazing cattle is a disgrace to what National Parks should stand for. Converting grasslands to farms is the antitheses to the very idea of a "national park." Commerce is not "for the people" - well, not all of the people anyway, just some. This apparent favoritism should not be allowed. Cattle and farming can go elsewhere. Inconveniencing the few should not take precedence over the many people, now and in the future, who support National Parks to enjoy the few parts of the country not changed by ranching and farming.

#7228

Name: Woods, Lori

Correspondence: There are many alternatives to keeping ranching, both for meat and dairy on Point Reyes in order to keep a park and parklands there open. Considering using cows for meat and dairy is not only inhumane, it's totally environmentally unsound and this in the era of climate change means the Park Service has an opportunity here to the the right thing going forward.

Don't be on the wrong side of history here. You know the right alternative: phase out the ranching and dairy operations in the park.

#7229

Name: Stanton, Timothy

Correspondence: I understand the the mission of the NPS at Point Reyes is to maximize protection of the Park's natural resources while enabling visitor access and beef and dairy ranching that does conflict with this mission. The GMPA appears to conflict with that mission in its proposal to enable ranchers to expand into vegetable farming and tourist guest services, and enable boat camping in our one marine wilderness area, Drake's Estero. I understand as well that the GMPA does not include any environmental analysis of these measures and accompanying ones, which would include additional commercial traffic on Park roads.

I do not know the motives of those who wrote this plan and recommendation, but it would appear that one must be to enable ranchers to expand and perhaps better sustain their operations, certainly make them more profitable. I don't think this effort, while perhaps laudable from the ranchers' perspective, is included in the mission of the Park and NPS. I ask therefore that this plan go back to there drawing board for further consideration.

Thank you.

#7230

Name: Rolph, Sarah

Correspondence: September 23, 2019

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

Dear Superintendent,

The General Management Plan Amendment Draft Environmental Impact Statement is so faulty it should be withdrawn. The document presents inaccurate information, relies on bad assumptions, and the analysis of the alternatives is entirely inadequate.

Former Seashore Superintendent Don Neubacher was once heard to say, What I wouldnt give for a park without ranches. Apparently nothing has changed. The DEIS is an apparent attempt to redefine Point Reyes National Seashore as a wildlife park and tourist attraction, rather than following its true mission of protecting this park unit based on its defining characteristics.

The DEIS deserves to be withdrawn if only because of its incorrect statement about the projects purpose and need. On page 4, the DEIS says, In 2013, at the direction of the Secretary of the Interior, the NPS Director issued a Delegation of Authority authorizing lease/permit terms for up to 20 years and directing NPS to initiate a National Environmental Policy Act (NEPA) process to evaluate the issuance of long-term leases. This is not true. There is no mention of NEPA in either then-Secretary Salazars November 29, 2012 decision memo or then-Director Jarviss January 13, 2013 delegation of authority. Instead of following these directives, the Seashore has initiated a NEPA process, apparently to validate the recent proliferation of elk on the ranch lands and to further restrict ranching activities. This is an abuse of the NEPA process.

Improper analysis of the Seashores tule elk

The DEIS uses an inexplicable hodgepodge of information about the tule elk in the Seashore to create the impression that this re-introduced species is a natural part of the environment on which impacts should be considered. By discussing the impacts on the elk, the Seashore neatly sidesteps the impacts by the elk. This is highly inappropriate, highly inaccurate, and has resulted in an inadequate analysis.

The DEIS omits all coverage of the elk depredations on ranches, even though the Seashore has been involved in discussions with the ranchers about this issue for years. There is even a published paper about these discussions (see Attachment A, The Continuously Managed Wild: Tule Elk at Point Reyes National Seashore, Journal of International Wildlife Law & Policy, 18:298-308, 2015). This paper provides abundant evidence that the statement

in the DEIS that the Seashore did not contemplate the expansion of the elk into the ranchlands is entirely inaccurate.

The DEIS uses the current elk range as its baseline for the elk analysis, and disregards, for purposes of the planning area, the 1998 Elk Management Plan and Environmental Assessment. Yet it says that the Seashore will continue to use the 1998 plan to manage the elk in the Tomales Point elk preserve. This arbitrary inconsistency is not supported by an information or analysis. The baseline for the current DEIS should be the range addressed by the 1998 EA. The Seashore has been remiss in not managing the elk according to plan. It should not be rewarded for that mismanagement, but should be held accountable to the 1998 plan. Any new elk-management planning must be considered within that framework.

The preferred alternative, Alternative B, is fatally flawed by its inaccurate analysis of the elk. The alternative as written would require ranchers to accept the grazing of the Seashores re-introduced elk on privately managed agricultural land, based on an arbitrary redefinition of the Seashores elk-management obligations. Any Final EIS must include an alternative that separates the elk from the ranches, in keeping with the 1998 EA.

The DEIS fails to include any analysis or discussion of the potential movement of the Limantour herd onto the ranch lands. The migration of this herd out of the designated elk range and onto ranch lands is already causing significant harm to ranchers. These impacts have increased over the last few years and are well-documented. The DEIS has not fully analyzed these impacts or considered the likely increase in elk migration onto ranch lands in the near future. Rather, it has been written in a way that ensures that expansion of the Limantour herd would be allowed. This is significant failure in the analysis of this impact topic. Any Final EIS must be corrected to include an analysis of all of the elk in the planning area, not just the Drakes Beach herd.

The issue of elk health has not been adequately analyzed. While the section of the DEIS on page 82 entitled Elk Health discusses only the two most common elk diseases, Johnes and CDW (the former is found in Point Reyes elk, the latter is not), on page 83, under Limits to Population Size, the DEIS states that Point Reyes elk are believed to be among the most inbred in California, and that copper and selenium deficiencies have been reported previously in the Tomales herd and more recently in the Drakes and Limantour herds, deficiencies that can negatively affect many aspects of the overall health of elk, including decreased resistance to disease, poor production, muscle damage, and developmental problems. This means that visitors to the Seashore may encounter the unpleasant sight of diseased or dying elk; the DEIS fails to take into account the impact of this on visitor use.

Officials at Point Reyes National Seashore appear to be prioritizing the value of the elk as a tourist attraction over the health of the animals. The Seashore should be required to create a biologically appropriate elk management plan that uses documented best practices to ensure the health of the animals. The Seashores current elk-management practices more closely resemble a wildlife experiment than a responsible wildlife-management plan.

Given the apparent failure of the Seashores elk-management efforts, any Final EIS should include an analysis of whether the elk population would be better managed by the California Department of Fish & Wildlife.

Alternative C, which purportedly provides an option for the necessary separation of the elk and the ranches, is fatally flawed by its lack of seriousness. The alternative is presented in a biased, skewed way.

For example, these statements on page 164: Lethally removing the Drakes Beach herd would result in an approximately 40% reduction of free-range elk in the planning area and a 2% reduction in the estimated California state-wide elk population (CDFW 2017) compared to existing conditions and would eliminate one of two free-range tule elk herds in the national park system. Impacts on the Drakes Beach herd would be significant because it would no longer exist. Overall viability of the tule elk population in Point Reyes or in California would not be affected; however, removal of a native species for ranching considerations would be unprecedented in the national park system and would be inconsistent with CDFW management of elk on ranchlands outside the park.

Most of this information is irrelevant. It does matter for purposes of the proposed action whether there is a reduction in the free-range elk in the planning area or a reduction in the estimated California state-wide elk population; the tule elk is not threatened or endangered, it is thriving. It is not relevant that this alternative would be inconsistent with CDFW management of elk on ranchlands outside the park; this DEIS is meant to address only actions inside the planning area. It is not appropriate to analyze the one alternative that removes the elk from the pastoral zone on the basis of its impact on the elk - it is the impact of the elk that this alternative should be analyzed to address. It is not accurate to describe the tule elk as a native species; it is a re-introduced species, which re-introduction was itself an NPS action under NEPA, and which requires management, as described in the 1998 EA and plan. Calling the removal of the elk unprecedented introduces an element of bias that is appalling in a formal planning document. Alternative C cannot be taken seriously, as the analysis itself is not serious.

The elk must be separated from the ranches, as indicated in the 1998 EA. The rational, science-based solution is to remove the so-called Drakes Beach herd back to the wilderness where it belongs, and place a fence in the appropriate spot to deter elk returning to the ranches.

This common-sense solution was inappropriately dismissed from consideration, based on an inaccurate analysis, even though relevant facts were presented in scoping. The following inaccuracies must be corrected in any Final EIS or ranch plan: " The necessary four-mile fence would cost far less than the proposed alternative; the DEIS analysis is inaccurate and inadequate because it does not compare the cost of this fence to the cost of current and proposed actions, such as ongoing hazing, repairing fences damaged by elk, and lethal control of elk to maintain populations. " Visitor experience would not be adversely affected. The fence as proposed by the ranchers, along the border of the wilderness, would be largely unnoticed. This park unit receives roughly three million visitors per year, almost all of whom arrive by car and drive around within the Seashore, from parking lot to parking lot. A fence at the border of the wilderness would not be noticed by most visitors. " The discussion of the fence in the DEIS is based on inaccurate assumptions about the nature of the terrain. There are ample opportunities for using natural barriers such as the forest and the ridge line to complement a partial fence at the border of the wilderness.

#### Inaccurate information about the environmental impacts of ranching

All of the alternatives presented are fatally flawed because of their reliance on inaccurate environmental analysis. The environmental analyses rely on a draft National Resource Condition Assessment that, by its own admission, is unsuitable for planning purposes, since (as stated on page xxviii of the NRCA) Information was insufficient to determine the trend for invasive plant and rare plant populations, the PORE range data set provides information about only one small part of the overall Point Reyes landscape, and further, that none of the indicator rankings were considered to have a high degree of certainty. Furthermore, the one factor that supposedly is of sufficient concern, total number of invasive species and number of introductions, is based on an inaccurate assumption-the reference condition is pre-European settlers (no invasive species) which is clearly an absurd standard for a national park unit.

The analysis of livestock impact on California red-legged frogs in the DEIS is downright embarrassing. It is quite clear from reading the document and supporting materials that the only reason Point Reyes is rich in red-legged frogs is that they are drawn to the stock ponds on the ranches. And yet the DEIS manages to find a likely adverse impact on the red-legged frog based on the notion that one of them might be trampled by a cow. No consideration is given to the possibility that a given frog might be trampled by an elk. Needless to say, the entire frog analysis is wildly inaccurate. This sort of thing would be laughable in a student paper. In a government document, it is grossly inappropriate.

Alternative F falsely implies that the elimination of ranching would benefit the environment. There is no valid information presented to support this assertion. The DEIS itself makes it clear that Over the long term, however, the cessation of ranching may not result in overall beneficial impacts, especially in grasslands, which constitute 48% of the planning area. Rates of shrub encroachment into grasslands, invasive perennial grasses, vegetative fuels (both herbaceous and woody), and the consequent risk of large, intense wildfires are all likely to increase, resulting in adverse impacts on vegetation."

These risks are being improperly discounted in the DEIS. Any final document must include a serious analysis of these risks, including the potential impact of large intense wildfires on property, human life, wildlife, and visitor use.

The purported impacts of agriculture on environmental factors such as soils, water quality, and air quality have been inadequately analyzed. Technical information provided by the ranchers in scoping has apparently been ignored, resulting in a shoddy analysis that is highly inaccurate. No valid evidence is provided for the negative environmental impact that is being claimed. Any Final EIS should include a scientific analysis of the environmental factors.

#### Inaccurate socioeconomic analysis

The socioeconomic analysis is based on inaccurate assumptions. Instead of discussing the economic impact of the proposed action alternatives in the planning area, the DEIS includes all of Marin County's production value - - and all of Sonoma County's production value, as well, including its large wine industry. This is highly misleading; one can only imagine that was the point. In a DEIS that considers the importance of the life of an individual frog, it is shocking to see the lives of the Point Reyes ranching families dismissed as 0.03% of total regional employment and 0.01% gross regional product in the study area.

The historic ranches within the planning area represent nearly 20% of the agricultural land in Marin County and the ranching families and their employees within the planning area produce nearly 20% of the agricultural product value in Marin County.

Not only does the DEIS use the wrong demographics for its economic analysis, it also fails to analyze one of the most important economic considerations: the viability of the ranches. Any Final EIS must take into account the impact of each alternative on the viability of the ranches.

The social and economic analyses in the DEIS are inaccurate and inadequate and must be reconsidered in any Final EIS.

#### Scoping gaps

A number of issues presented in scoping have not been accounted for. The Watt paper mentioned earlier, *The Continuously Managed Wild*, was presented in scoping and apparently ignored. Carbon farming is an important new aspect of rangeland management, and the Seashore knows that there is interest in carbon farming among Point Reyes ranchers, both from ongoing discussions and from the content of materials presented during scoping. Yet the DEIS mentions carbon farming only in the appendices.

These are just two examples of the Seashore's failure to address important issues that were brought up during scoping. This failure casts serious doubts on the integrity of the process.

#### Reasonable alternative

The DEIS presents no alternatives that are not fatally flawed by poor information, bad assumptions, and faulty analysis. The multiple serious failures of this document suggest that this process was not conducted in good faith. The Seashore should withdraw this fatally flawed DEIS and create a new plan that provides: " 20-year agreements for ranchers, as directed by then-Secretary Salazar in his November 29, 2012 decision memo, authorized by then-Director Jarvis in his January 13, 2013 delegation of authority, and promised by Superintendent Muldoon in her January 13, 2013 letter to the ranchers. " Consideration of the economic, aesthetic, and cultural value of ranching in Point Reyes National Seashore, including economic viability of the individual ranches as a management goal. " A socioeconomic analysis of the proposed action that includes only the proposed action area. " Science-based management of the natural resources in Point Reyes National Seashore, including an end to arbitrary limits on animal units. " Separation of the elk from the ranches, in accordance with the 1998 EA. The discussion in the DEIS

about fencing is highly inaccurate. The Drakes Beach herd should be re-located to the wilderness zone and secured with a fence. " Rangeland management authority to the ranchers. Only the proprietors of each individual ranch know the land well enough to manage it. Seashore officials, planners, and biologists should defer to or partner with ranchers on all matters relevant to rangeland management.

The scoping letter provided by the ranchers during the initial public scoping period, and the Community Alternative provided during the recent scoping process, provide abundant guidance for a reasonable alternative for properly managing the Seashores natural and cultural resources.

#### Summary

The purpose and need of the proposed action can be best accomplished in a way that meets the NPS mission and responsibility if the Seashore will work together in partnership with the Point Reyes ranchers and the West Marin agriculture community. The current DEIS should be withdrawn or very substantially revised. The Seashore should create a new environmental impact statement that draws on the best available science of rangeland management, working together with the ranchers and their partners in the local agricultural organizations.

Sincerely yours,

Sarah Rolph

Attachment A: The Continuously Managed Wild Available online at  
[https://www.researchgate.net/publication/286302438\\_The\\_Continuously\\_Managed\\_Wild\\_Tule\\_Elk\\_at\\_Point\\_Reyes\\_National\\_Seashore](https://www.researchgate.net/publication/286302438_The_Continuously_Managed_Wild_Tule_Elk_at_Point_Reyes_National_Seashore)

#7231

Name: Walsh, Mark

Correspondence: NOTE!!! THIS SUBMISSION IS ONLY TO CORRECT LINE SPACING OF EARLIER 9/23/19 SUBMISSION FOR EASE OF NPS REVIEW READABILITY! ALL OTHER CONTENT IS EXACTLY THE SAME AS PREVIOUSLY SUBMITTED!

September 22, 2019

Superintendent Cicely Muldoon Point Reyes National Seashore 1 Bear Valley Road Point Reyes Station, CA 94956

Re: DEIS-GMP Public Comment Oppose Plan B - Support Plan F

My name is Mark A. Walsh. I have walked along the lands, beaches, forests, estuaries, bays, creeks, and ocean of Point Reyes National Seashore(PRNS, the Seashore) since 1978 - 16 years after President John F. Kennedy signed the 1962 U.S. Congressional enabling legislation into law , specifically to protect this rugged California coastal region from development for all Americans and for peoples of the world.

This law establishing our Seashore states it is not created to preserve ranches and ranchers, but to save and preserve, for the purposes of public recreation, benefit, and inspiration, a portion of the diminishing seashore of the United States that remains undeveloped. Further, the Purpose Statement for our Point Reyes National Seashore states: Established for public benefit and inspiration, the Point Reyes National Seashore protects a rugged and wild coastal peninsula and surrounding waters, connecting native ecosystems, enduring human history, and recreational, scientific, and educational opportunities.

The National Park Service (NPS) and Department of the Interior (DOI) grievously, irresponsibly, and callously err and abdicate sound stewardship with their strenuous promotion of the current DEIS-GMP Plan B - an

asymmetrical near-militaristic assault on our national parks lands and waters. Past and current Seashore management leadership officials likewise actively deliver shameful and disingenuous words and actions, seemingly as pawns of or agents for special-interest commercial- and industrial-level private rancher, livestock, ag, and land development business owners, lawyers, and lobbyists . As often do our federal U.S. Representatives and Senators, who likely have never truly witnessed and experienced with boots-on-the-ground experiences the travesty wreaked upon lands, waters, wildlife, and flora of our national Seashore.

I have studied, learned, observed, and experienced myriad natural settings, fauna, and flora throughout the Seashore at all times of day, evening, and night. This has extended into similar experiences throughout the Golden Gate National Recreation Area (GGNRA).

My substantive public comments come from using the rightfully-purchased publicly-owned lands and waters of PRNS and GGNRA - witnessing and experiencing for over 4 decades the willful attacks and abuse on these national parks by 24 private, law-breaking, uncooperative, disruptive, and destructive dairy/beef rancher and related ag businesses who have controlled and expanded their influence and destruction for nearly 6 decades. The majority of these 24 erstwhile quaint family farms and ranches opposed the enabling 1962 PRNS legislation, and have metastasized into commercial- and industrial-level dairy/beef ranching, livestock, ag, and development operations - polluting public lands and waters, and traumatizing or killing wildlife and wild flora in their private business pursuit of profits with the help of government subsidies and tax schemes.

Rather than weight 5 of the 6 PRNS DEIS-GMP plans for private ranching, livestock, ag biz, and retail expansion, the NPS should adhere to all NPS laws and policies to restore and protect lands, waters, wildlife, and wild flora - as prioritized and required in its own founding legislation, and in the enabling PRNS and GGNRA legislation. The Interior Department, NPS, PRNS, and GGNRA should implement Plan Fs principles.

Time did not start with ranching on the Point Reyes peninsula - whether with 24 private rancher businesses in 1962, or during 1800s Americanos property takeovers, or with earlier Spanish mega-hacienda land-grants. This was an ancient open landscape with true native cultural icons and stewards of wildlife, wildlands, wildwaters, and wild flora. To compare respectful and honorable practices of native Miwok or Ohlone cultures to present ag bizs loafing barns; cattle yards and feed lots; PVC single-calf enclosures; rutted unpassable trail erosions; fetid bovine-wasted coastal prairies and creeks; miles of restrictive barbed and electric wire fences; cattle-generated methane gas levels more concentrated and harmful than annual vehicle visitations; and all other private government-subsidized ranching and ag operations is either intentional cultural history fabrication, or fantastical delusion. Go ask the remnants of these native peoples what they think of the cultural heritage and ranching expansion actions past and present of the NPS and PRNS/GGNRA management plans as cultural or historical fact and truth - ask surviving Miwok and Ohlone peoples if they support absolute and total lands, waters, wildlife, and native flora desecration.

**NO ON PLAN B - YES ON PLAN F!**

Mark Walsh, One Persons Direct Substantive Experience - Point Reyes National Seashore and Golden Gate National Recreation Area - Plan B Would Cause Even Further Damage of Wildlands, Wildwaters, Wildlife, and Wild Flora

" Estero Trail: trampled, muddied, rutted, seeping with cattle feces and urine; vast fenced-off inaccessible acreages; navigation through bovine herds, cleaning cattle excrement off boots in what is to be a wilderness experience; passing fetid cesspool-like algae-choked ponds and runoffs; filthy bridges; disease risk and exposure; unsafe/unhealthy family recreation; noxious smells; methane; non-native plants suffocating native plants; cattle not wildlife proliferation; little-to-no ground wildlife; crows, starlings, cow birds, and ravens. " Hearts Desire/Indian Beaches: massive manure-induced algae blooms/mats at supposed swimming beaches; disease risk and exposure; extensive cattle and ag development/byproduct waste runoff on beaches/cliffs and into bay/surf; disease risk and exposure; unsafe/unhealthy family recreation; private ranching, livestock, and ag business operations threaten endangered/marine species; crows, starlings, cow birds, and ravens.



" Abbotts Lagoon, McClures, Kehoe Trails/Beaches: adjacent overgrazed and bare-earth coastal prairie (so-called Pastoral Zone to be designated the more aggressive Ranch Zone); fetid cesspool-like algae-choked ponds and runoffs; filthy bridges; extensive cattle and ag development/byproduct waste runoff on beaches and into lagoons/ponds/creeks/surf; cattle excrement accumulation in multiple runoffs to lagoon/ponds/beaches/ocean; disease risk and exposure; unsafe/unhealthy family recreation; noxious smells; methane; cattle not wildlife proliferation; non-native plants suffocating native plants; little-to-no ground/dune/aerial wildlife; private ranching, livestock, and ag business operations threaten endangered/marine species; crows, starlings, cow birds, and ravens.

" Drakes Beach/Trail: trampled, muddied, rutted, seeping with cattle feces and urine; extensive fenced-off inaccessible acreages; adjacent overgrazed and bare-earth coastal prairie (so-called Pastoral Zone to be designated the more aggressive Ranch Zone); noxious smells; methane; cattle not wildlife proliferation; little-to-no ground wildlife; non-native plants suffocating native plants; extensive cattle and ag development/byproduct waste runoff on beaches and into bay/surf; disease risk and exposure; unsafe/unhealthy family recreation; private ranching, livestock, and ag business operations threaten endangered/marine species; crows, starlings, cow birds, and ravens.

" Agate Beach/Duxbury Reef Beach/Palomin Beach: extensive cattle and ag development/byproduct waste runoff on beaches/cliffs and into surf; cattle excrement accumulation in multiple runoffs to beaches/ocean; disease risk and exposure; adjacent overgrazed and bare-earth coastal (so-called Pastoral Zone to be designated the more aggressive Ranch Zone); extensive fenced-off inaccessible acreages; disease risk and exposure; unsafe/unhealthy family recreation; private ranching, livestock, and ag business operations threaten endangered/marine species; crows, starlings, cow birds, ravens. " Bull Point Trail: trampled, muddied, rutted, seeping with cattle feces and urine; extensive fenced-off inaccessible acreages; inclusive and adjacent overgrazed and bare-earth coastal prairie (so-called Pastoral Zone to be designated the more aggressive Ranch Zone); noxious smells; cattle not wildlife; little-to-no ground wildlife; non-native plants suffocating native plants; extensive cattle and ag development/byproduct waste runoff on beaches and into bays/estuaries/surf; navigation through bovine herds, cleaning cattle excrement off boots in what is to be a wilderness experience; noxious smells; methane; disease risk and exposure; unsafe/unhealthy family recreation; private ranching, livestock, and ag business operations threaten endangered/marine species; crows, starlings, cow birds, and ravens.

" Millerton Point/Beach: extensive cattle and ag development/byproduct waste runoff on beaches and into bay/surf; cattle excrement accumulation in multiple runoffs to beach/bay; disease risk and exposure; unsafe/unhealthy family recreation; adjacent overgrazed and bare-earth coastal prairie (so-called Pastoral Zone to be designated the more aggressive Ranch Zone); large adjacent fenced-off inaccessible acreages; private ranching, livestock, and ag business operations threaten endangered/marine species; little-to-no ground/dune wildlife; crows, starlings, cow birds, and ravens.

" Jewell/ Bolinas Ridge Trails: trampled, muddied, rutted, seeping with cattle feces and urine; extensive fenced-off inaccessible acreages; adjacent overgrazed and bare-earth coastal prairie (so-called Pastoral Zone to be designated the more aggressive Ranch Zone); navigation through bovine herds, cleaning cattle excrement off boots in what is to be a wilderness experience; noxious odors; methane; cattle not wildlife proliferation; little-to-no ground wildlife; non-native plants suffocating native plants; extensive cattle and ag development/byproduct waste runoff on trails; noxious smells; methane; disease risk and exposure; unsafe/unhealthy family recreation; crows, starlings, cow birds, and ravens. " Bay (Tomales) Trail: trampled, muddied, rutted, seeping with cattle feces and urine; navigation through bovine herds, cleaning cattle excrement off boots in what is to be a wilderness experience; inclusive overgrazed and bare-earth coastal prairie and riparian habitat (so-called Pastoral Zone to be designated the more aggressive Ranch Zone); extensive fenced-off inaccessible acreages; private ranching, livestock, and ag business operations cause threats to endangered species; non-native plants suffocating native plants; fetid cesspool-like algae-choked ponds/creeks/runoffs; filthy bridges; disease risk and exposure; unsafe/unhealthy family recreation; noxious smells; methane; non-native plants suffocating native plants; cattle not wildlife proliferation; little-to-no ground wildlife; crows, starlings, cow birds, ravens. " Great/North Beach: adjacent overgrazed and bare-earth coastal prairie and riparian habitat (so-called Pastoral Zone to be designated the more aggressive Ranch Zone); extensive fenced-off inaccessible acreages; private ranching, livestock, and ag business operations cause threats to endangered species; extensive cattle and ag development/byproduct waste runoff on

cliffs/dunes/beaches; non-native plants suffocating native plants; little-to-no ground/dune wildlife; cattle excrement accumulation in multiple runoffs to beach/ocean; disease risk and exposure; unsafe/unhealthy family recreation.

" Overlooks and Vistas - Ranching Operations West of Inverness Ridge - from Mt. Vision, Pt. Reyes Hill, Sir Francis Drake Highway, and Pierce Point Road: huge private commercial/industrial-level beef/dairy businesses; concentrated central operations cattle/feed lots, complexes, and compounds occupying 2-20 acres; despoiled, rutted, muddied coastal prairie and riparian habitat (so-called Pastoral Zone to be designated the more aggressive Ranch Zone); concentrated mega-buildings, cattle pens/paddocks, loafing barns, ranch/farm vehicles/equipment/implement/machinery; cleared/removed native and non-native foliage, brush, trees; extensive cattle and ag development/byproduct waste runoff; extensive fenced-off inaccessible acreages; vast overgrazed and bare-earth coastal prairie and riparian habitat (so-called Pastoral Zone to be designated the more aggressive Ranch Zone); noxious smells; methane; cattle not wildlife proliferation; crows, starlings, cow birds, and ravens. " Etc. - Plan B Increases and Expands Existing Damages to Coastal Prairie, Woodlands, Trails, Creeks, Runoffs, Ponds, Lagoons, Estuaries, Bays, Beaches, Ocean, and Vast Fenced-Off Inaccessible Public Lands and Waters.

First, I strongly and unequivocally - once again and still now for over these 4 decades of my direct experiential witness and exposure within PRNS and GGNRA - object to the NPS, PRNS, and GGNRA officials comprehensive, derelict, and gross mismanagement of our public Seashores national park wildlands, wildwaters, wildlife, and wild flora.

Second, I strongly and unequivocally object to the completely misguided and unscientific Plan B promoted and preferred by NPS and PRNS management that serves special-interest commercial- and industrial-level private rancher, livestock, ag, and land development business owners, lawyers, and lobbyists. Such plans and implementations fall against significant laws, policies, and regulations of the Organic Act of 1916 establishing the NPS, as well as the enabling legislation establishing PRNS and GGNRA. I further object to Plans A, C, D, and E for similar or other legal, ethical, scientific, health, or safety reasons.

Third, I strongly and unequivocally oppose Plan B and support Plan F, to be considered as a starting point to incorporate exact specifics to once and for all, after 57 years since the Seashores creation: " completely remove from PRNS and GGNRA all ranching, cattle, large and small livestock, agriculture, or other development-type business operations " cease planning and implementation of proposed private rancher business income diversifications; expanded acreage and numbers of dairy and beef cattle; allowance of row crops; introduction of small livestock operations (pigs, goats, sheep, chickens, ducks, turkeys, rabbits, etc.); allowance of retail overnight accommodations, hospitality venues, shops, and roadside stands " remove or cease planning and implementation of all similar, related, and attenuated private business development activities " and fully facilitate, encourage, and deliver restoration and protection of wildlands, wildwaters, wildlife, and wild flora, especially for free and open proliferation of iconic Tule elk In essence, to the most complete and thorough scope and degree, immediately and henceforth prioritize restoration and protection of PRNS and GGNRA for the health, well-being, education, research, experience, and enjoyment of present and future generations through the utmost science- and ethics-based sound wildlands, wildlife, wildwaters, and wild flora restoration and protection principles and practices.

Since the 1960s, the 24 rancher businesses negotiated for and were compensated fair-market value (appraised at over \$350M in today's dollars) for their properties. Lease-back arrangements to ranching operations over these 57 years have proven the disregard and actual contempt these coddled parties have for millions of their brethren and for the lands, waters, fauna, and flora abused by their reckless attitudes and actions. Of a total 71,000 PRNS acres, 28,000 acres (39.4%) are already in de facto control of publicly-subsidized private rancher, livestock, and related ag and land development business operations. The NPS and PRNS leadership are to hold accountable these current private rancher, livestock, ag, and land development business operations through legislative, administrative, and legal oversight, enforcement, and punishment&..and regularly and continuously opt to ignore or fail their official NPS and PRNS roles and responsibilities of service to the greater millions of the American people, all for 24 rancher businesses.

What dollar value can legitimately be placed on increasingly rare wild spaces?

Is \$350M an accurate current assessment for nearly 30,000 acres of California coastline, what ag and land developers consider (with dollar-signed eyes) prime real estate? Is \$700M? Is \$2B? \$5B? \$10B? How can the present privately-owned, publicly-subsidized, and tax-free ranch operations in PRNS and GGNRA - which either by owner or spouse death, or by 25-year life estate maximum extension - still be squatting on and insistently, even proudly, ravaging our publicly-owned and increasingly vulnerable PRNS and GGNRA national parks lands, waters, wildlife, and wild flora?

What explains the continued and adamant support of NPS and PRNS over 57 years for the worst options for environmental, ecological, scientific, even cultural restoration and protection for our Seashore and GGNRA?

The Point Reyes Seashore Ranchers Association website has one page, and its first sentence is: Our members are families who have owned and operated small ranches within the pristine landscape that is now the Point Reyes National Seashore.

Small? Blocking off and controlling nearly 40% of PRNS public national park land and waters? Nearly every view and vista overcome with commercial/industrial-sized dairy and beef ranching operations? Pristine? Cattle defecation, manure, urine, and ag waste that incubates as potential disease stew harmful to humans and wildlife, seeping and floating across soil, water, and air? Massive concentrated commercial/industrial-level private ranch compounds that look like nuclear sites?

NPS, PRNS, and GGNRA management already abrogates its legal and ethical responsibilities. And yet prefers even more super-sized wholesale destruction through Plan Bs woeful structure, mechanics, and non-science. As conditions are today, it will be a herculean undertaking just to restore the existing damage by ranching, livestock, and other ag biz operations over the past 57 years of ranching stewardship.

Have the Point Reyes Seashore Ranchers Association (PRSRA) and Resilient Agriculture Group (RAG) in the end - with rancher, ag, and land development proponents Kevin Lunny, Phyllis Faber, Sara Rolph, John Doolittle, Baker Botts, and other local and national private ag business operators, for-hire civil/criminal lawyers, and local and federal special interest lobbyists - deliberately compromised NPS or PRNS/GGNRA management at the expense and value to all Americans safe and healthy access to experience and enjoy our Seashore national park? Has our U.S Representative Jared Huffman or U.S. Senator Dianne Feinstein ever gotten out of an SUV and walked along PRNS and GGNRA bovine-waste-infused lands and waters - where cattle manure and urine stagnates in mass irregular liquid puddles, floats in tangled gaseous algae mats in ponds and creeks, or runs off and spews loosely into Tomales Bay or the Pacific Ocean, visibly and viscerally fouling beaches and surf?

Will NPS and PRNS/GGNRA management ever act on behalf of this nations current generations and future generations - rather than for 24 private rancher businesses that generate little benefit and cause exponential harm to nearly 40% of our Seashore? What about our California leadership role in responsible climate action? Or will NPS and PRNS/GGNRA officials cave once more, and act as if they exist literally to cow-tow to 24 private rancher businesses at full-go-for-more concessions to steal from our national park?

If NPS and PRNS/GGNRA management officials so desire to work in the frameworks of the BLM, Forestry Service, or Department of Agriculture, they may consider transfer to those entities, leaving NPS, PRNS, GGNRA, and other national parks to be led by those who will follow U.S. laws pertaining to the NPS.

Dairy, beef, and related livestock and agriculture markets inexorably and deservedly are collapsing as humans strive for more healthy nutrition and lifestyles - just as scientifically-established exorbitant and deadly concentrations of methane gas from livestock ranching disastrously impacts our global climate. The NPS and PRNS/GGNRA management - in oddly quizzical, illogical, and even illegal actions - promote and support private rancher and ag businesses on our Seashore and other public national park lands. This not only continues but

dangerously expands these management officials own devastating climate-impact effects that poison our soil, waters, and air - and our rights to coexist with our own and other species.

In closing, I strongly and unequivocally oppose Plan B and support Plan F, to be considered as a starting point to incorporate exact specifics to once and for all, after 57 years since the Seashores creation: " completely remove from PRNS and GGNRA all ranching, cattle, large and small livestock, agriculture, or other development-type business operations " cease planning and implementation of proposed private rancher business income diversifications; expanded acreage and numbers of dairy and beef cattle; allowance of row crops; introduction of small livestock operations (pigs, goats, sheep, chickens, ducks, turkeys, rabbits, etc.); allowance of retail overnight accommodations, hospitality venues, shops, and roadside stands " remove or cease planning and implementation of all similar, related, and attenuated private business development activities " and fully facilitate, encourage, and deliver restoration and protection of wildlands, wildwaters, wildlife, and wild flora, especially for free and open proliferation of iconic Tule elk In essence, to the most complete and thorough scope and degree, immediately and henceforth prioritize restoration and protection of PRNS and GGNRA for the health, well-being, education, research, experience, and enjoyment of present and future generations through the utmost science- and ethics-based sound wildlands, wildlife, wildwaters, and wild flora restoration and protection principles and practices.

Plan F Starting Points for Exact and Specific PRNS/GGNRA Priority, Planning, Policy, Action, and Enforcement

1. Phase out all ranch, livestock, agriculture, and other development as was originally intended by the establishing legislation for PRNS and GGNRA, or to otherwise restore and protect the Seashore
2. Prioritize and manage the Seashore for the natural landscapes, resources, and values it was created to preserve - wildlands, wildwaters, wildlife, and wild flora
3. Restore, encourage, and protect wildlands, wildwaters, wildlife, and wild flora - cease private rancher businesses, livestock operations, and expansion into small livestock, crops or row crops, harvesting, processing, storage, hospitality and accommodations, retail shops and stands, and all similar, related, and attenuated private business development activities.
4. Restore and protect the so-called Pastoral Zone and similar areas back into naturally healthy and sustainable coastal prairie, woodland, riparian, bay, ocean, wildlife, wild flora, and other natural habitat, emphasizing protection for appropriate education, research, recreation, and enjoyment.
5. Repurpose 3-or-less scaled-down ranches limited to 5 total acres each for cultural history purposes.
6. Investigate, plan, and implement with local native peoples cultural restoration and protection of ancestral Miwok and Ohlone sacred and community lands and waters throughout the Seashore and GGNRA.

Signed, Mark A. Walsh

September 22, 2019

#7232

Name: Marvel, Jonathan

Correspondence:

The only reasonable and legal alternative in the National Park Service's Draft EIS for future management of Tule Elk and agricultural operations in Pt. Reyes National Seashore (NS) and Golden Gate National Recreation Area (NRA) is alternative F.

The termination of agricultural activities in both the NS and the NRA was the intent of the enabling legislation. Tens of Millions of federal tax dollars were expended to acquire private ranch inholdings over 45 years ago and the generous leasebacks of ranch and dairy lands after their purchase was intended to be ended after the lifetime of existing operators or after a fixed time period.

The Park Service must honor Congressional intent and choose and implement Alternative F from the Draft EIS. That choice is the only way to protect all the environmental elements and values of the NS and NRA that are unique to Pt. Reyes NS and Golden Gate NRA.

Please make sure to keep me on the emailing and mailing notification list for all future documents to be issued in this process, and thanks for the opportunity to comment.

Jon Marvel

#7233

Name: Levine, Alexis

Correspondence: Public lands and native wildlife on Point Reyes National Seashore and Golden Gate National Recreation Area need to be protected from cattle and commercial agricultural expansion. This is a serious back slide to allow, or allow to persist.

#7234

Name: kellogg, bonnie

Correspondence: The threat to Point Reyes National has me heart-sick. As one who has loved that area for a LONG time, it has seemed vastly unfair that this public land has become the private playground and source of wealth for a select few, who SOLD their land, received payment and are STiLL able to continue "business as usual" except with the protection of a few highly placed officials who, while elected to represent ALL the people clearly have in mind ONLY their own pocket books and self interest. (Alas I heard that the Sierra Club won't even touch this one because the people involved are on the "right side of politics").

There is a lot of land that these wealthy farmers/ranchers can BUY to further their self interests .. instead they have managed to create a plan that will further harm the environment at the expense of wildlife. As the world becomes more aware of the health and environmental benefits of whole food plant based diets, why is our government continuing to act as if adding more livestock to this area will be a benefit? To whom? Not to the atmosphere, not to the natural wildlife, not to the citizens who enjoy the area. No .. the only beneficiaries will be the 24 priviledged farmers/ranchers, who already underpay rent for the land they are using.

Please please please don't let this happen. Please stand firm for our revered and endangered Tule Elk. Please let this beautiful area remain open to photographers, campers, hikers ... to the public. If anything the current contracts should be curtailed, not enhanced.

Think about YOUR children and grandchildren.. where will they go? We need this area and more like it, and we don't need more rich farmers/ranchers. We don't need more wealthy politicians with their special interest friends. We need for our Public Lands to be protected.

Please help!

#7235

Name: Lowe, Margot

Correspondence: I am writing to urge the National Park Service to discontinue the grazing of beef and dairy cattle at Point Reyes National Seashore. This precious area has been damaged by livestock grazing which poses a threat to the environment and local wildlife and it should be protected and used to serve the public good, and not for the benefit of the livestock industry.

I strongly oppose Option B and any other proposal that would be fatal to Tule Elk or other wildlife to the benefit of ranching operations, and encourage the agency to adopt Option F to discontinue grazing and allow members of the public to enjoy this beautiful park and to be enriched with opportunities to visit and appreciate this special place.

#7236

Name: Grayson, Letty

Correspondence: Please do not expand ranch grazing permits in this area. As a taxpayer, I wish the public land to remain as close to natural as possible and I enjoy photographing and seeing the elk. I do not want more domestic farm animals on this land.

#7237

Name: Kline, Susan

Correspondence: It is clear from the Draft Environmental Impact Statement that cattle ranching as it would happen in the ranching alternatives provided will have negative environmental impacts on water and air quality, vegetation, soils, and wildlife. Because of this, all these alternatives would violate the responsibilities given to the Park Service under several statutes. For this reason, the Park Service should not go forward with a Final EIS. Instead, a supplemental DEIS that includes ranching alternatives that protect natural resources must be prepared and circulated to the public.

Thank you, Susan Kline

#7238

Name: Bayers, Denise

Correspondence: I am writing to urge the National Park Service to discontinue the grazing of beef and dairy cattle at Point Reyes National Seashore. This precious area has been damaged by livestock grazing which poses a threat to the environment and local wildlife and it should be protected and used to serve the public good, and not for the benefit of the livestock industry.

I strongly oppose Option B and any other proposal that would be fatal to Tule Elk or other wildlife to the benefit of ranching operations, and encourage the agency to adopt Option F to discontinue grazing and allow members of the public to enjoy this beautiful park and to be enriched with opportunities to visit and appreciate this special place.

#7239

Name: De Polo, Mokai

Correspondence: I comment today because the proposed General Management Plan amendment for Point Reyes National Seashore and Golden Gate National Recreation Area fails to protect and restore these vital public lands. The Point Reyes National Seashore legislation specifically mandates that this special coastline be "protected" and "restored."

I append my comments to those of Denise Boggs, Director of Conservation Congress, who wrote: "The National Park Service should be managing the National Seashore for the benefit of wildlife and the natural ecology. Emphasizing livestock ranching while subsidizing welfare ranchers is a takings of public land. Livestock don't belong on public lands in general and certainly not in a Seashore where fecal matter can get into the ocean."

Additionally, I append my comments to those of Laura Cunningham, California Director of Western Watersheds Project, whose testimony includes this statement: "I have seen coho salmon streams (within Point Reyes National Seashore) eroded from heavy trampling by the hooves of beef cattle, native bunchgrasses grazed out of existence..."

Managers for NPS, GGNRA, or Point Reyes National Seashore should not allow hazing elk out of cattle pastures or any action to lethally remove native elk. I add my voice to oppose any such plans or proposals.

Thank you for the timely consideration of these comments.

#7240

Name: Straus, Albert

Correspondence: September 23, 2019

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

Subject: General Management Plan Amendment Draft Environmental Impact Statement

I appreciate the opportunity to submit comments for the Draft Environmental Impact Statement (DEIS) for a General Management Plan Amendment (GMP Amendment) addressing all lands currently under agricultural lease/permits within Point Reyes National Seashore and the north district of Golden Gate National Recreation Area in accordance with the National Environmental Policy Act and the public involvement requirement of the National Historic Preservation Act.

Background My name is Albert Straus. I was born in Marshall. Im an organic dairy farmer, who grew up on a family dairy farm in west Marin County. I converted our family dairy farm, which my father originally started in 1941, to a certified organic dairy in 1994, which is the first certified dairy west of the Mississippi River.

In 1994, I founded Straus Family Creamery, the first 100 % certified organic creamery in the United States. Straus Family Creamery has been in business for 25 years and has grown to buy certified organic milk from 12 dairies (six in Marin County) including two in the PRNS. The six Marin County organic dairies represent tens of millions of dollars in revenue and contribute heavily to the local rural economy.

The two organic dairy family farms in PRNS that supply certified organic milk to Straus Family Creamery include fourth-generation owner Jarrod Mendoza of Double M Dairy, which is located on 1,200 acres at the Historic B Ranch on the Point Reyes Peninsula. He has provided certified organic milk to Straus Family Creamery since 2014. In July 2019, Drakes View Dairy joined our group of suppliers. Fifth-generation William Nunes and Lianne Nunes-Taverna, the brother and sister team, operate the dairy farm on 866-acres at the Historic A Ranch in the Point Reyes National Seashore. William, Lianne, and their family are celebrating 100 years of dairy farming in the same location in the Point Reyes Seashore that their great-great-grandfather first started dairy farming in 1919.

My family was instrumental in the formation and the communitys vision of a park that preserved the environment at the same time sustaining the dairies and ranches. My mother Ellen Straus co-founded Marin Agricultural Land Trust which has preserved for eternity over 50,000 acres of farmland, The Environmental Action Committee of West Marin was co-created by my mother, to help facilitate a common vision of the future with environmentalists, farmers, community members, and government. I served on the board for many years.

Ranching in Point Reyes National Seashore is at a critical juncture in its existence. I believe the current DEIS for GMP Amendment intentionally fails to support the dairy farming and ranching in PRNS and fails to support ranching families and the surrounding communities.

I believe the DEIS for GMP Amendment and the preferred alternatives have inadequately analyzed and evaluated important issues and must be better designed to recognize the historical, cultural, social, educational, scenic, and environmental values and opportunities of the working dairies and ranches in the limited area of the PRNS and GGNRA recognized as the Point Reyes Peninsula Dairy Ranches Historic District and the Olema Valley Dairy Ranches Historic District.

According to the American Bar Association, an EIS is a government document that outlines the impact of a proposed project on its surrounding environment. In the United States, these statements are mandated by federal

law for certain projects. EISs are meant to inform the work and decisions of policymakers and community leaders. A typical EIS includes a section that analyzes the environmental impact of each of the Proposed Actions and Range of Alternatives. The analysis includes:

- o Impacts to threatened or endangered species
- o Air and water quality impacts
- o Impacts to historical and cultural sites, particularly sites of significance for indigenous peoples
- o Social and economic impacts to local communities, including housing stock, businesses, property values, and considerations of aesthetics and noise expected
- o Cost and schedule analysis for all of the actions and alternatives presented

From the perspective of farming and food-producing rural communities, comprised of families that work the land, I recommend these changes because its urgently necessary to enact sensible, practical and economic solutions to ensure that agriculture and the people who live here continue to have an essential role in our region for generations to come.

Please consider my recommendations below:

1. The risk of losing USDA organic certification of the dairy farms in PRNS was not considered in the DEIS. The organic farming model has a National law (USDA National Organic Program) which is based on care for the soil, environment, animals, farmers, and ranchers. This farming model has been essential to sustaining family farms, which contribute heavily to the local economy and communities. Six dairies in the PRNS are certified organic out of the approximately 23 organic dairies in Marin. This counts for more than 25% of Marin Countys organic milk production. According to the 2016 Marin County Livestock and Crop report, the dollar value of organic milk production is \$39,144,000. This almost \$40 million dollars is the highest value crop in the county and thus deserves to be protected as an important county resource. Organic dairy farming has created a proven stable price model and market for dairy farmers in this region.

Under the National Organic Program (NOP)s Pasture Rule, as established by USDA Organic Label requirements, certified organic farming operations must follow an extensive set of regulations around grazing and pasture management standards. The intent of the Pasture Rule is to ensure that organic ruminant operations are pasture-based and to increase pasture productivity and pasture quality over time. Organic producers should maximize the number of days their animals are on pasture. The length of the grazing season must be at least 120 days long within each one-year period. The NPS has a passive approach to land management and restricts and prohibits a pasture management system that includes maximizing pasture productivity with proactive ranchland practices such as carbon farming, compost application, mowing, and seeding.

Organic operations, which must compete with other species such as the Elk Herd that are crossing over into the ranchland zone, are at risk of losing their organic certification. The Elk Herd are eating the grass designated for the cows in the ranchland zone as outlined by the National Park Service (NPS). All the Elk Herds currently impacting ranching operations in PRNS were never authorized to be in the ranchland zone that they now occupy. With the Elk Herd eating the cows grass, they reduce pasture for livestock that is essential to meet federal law requirements. In addition, the cows animal welfare is being threatened by competing species. This undermines the organic standards and the viability and credibility of the ranchers organic business. Ironically, the elk herds consumption of leased pasture grass also puts the ranchers at risk of violating (through no fault of their own) the PRNS grazing standard of 1200lbs of residual dry matter left on pastures prior to the rainy season Source: Lane, Ethan. (2014). Ranching at Point Reyes: Two Centuries of History and Challenges.

The Elk are carriers of Johnes disease, which is transmittable to cattle. For this reason, ranchers are concerned about the elks presence in the pastoral zone. The elk population also competes with cattle for forage and water and have also been known to knock down cattle fences. One reason that this competition is problematic for the ranchers, is that when their pastures are grazed by elk, they need to bring in forage for their own cattle which puts them at risk in compliance with organic standards. This species doesnt currently have a predator in the park, causing their population to fluctuate. Since 1998, their population has ranged from 350 to 550 animals. Source: Ranching in Point Reyes National Seashore: Compromise and Coexistence, Spring 2017, page 27, University of Colorado, Boulder CU Scholar: Fiona Pettigrew.



The NPS has not taken any action to remove the Elk Herds from the ranchland zone. And the PRNS, by not following the 1998 Elk Management Plans intent, has intentionally driven out farmers. This is not an issue between the ranches and the Tule Elk population; it is an issue of management (or mismanagement) by the NPS. Free-ranging or not, these animals live in a cultivated landscape, and pretending that they will ever be free from human intervention only makes clear-headed management more difficult to implement Source: Watt, L. A. (2015). The Continuously Managed Wild: Tule Elk at Point Reyes National Seashore. *Journal of International Wildlife Law & Policy*, 18(4), 289-308. <https://doi.org/10.1080/13880292.2015.1096159>

Removal is necessary because their presence is in direct conflict with organic farming practices, making farming in this region less viable. The NPS has a passive land management approach. In addition to the mismanagement of the Elk Herd, the NPS is either restricting or prohibiting sustainable ranching practices (e.g. allowing methane digesters, carbon farming practices, etc.). Ranchers are active in wanting to implement sustainable agricultural practices. The NOP and its members are proactive, and the organic standards will continue to evolve, requiring more sustainable farming practices to mitigate climate change. All California dairy farmers - from the nations leading agricultural state - are already facing pressure to lower methane emissions under the states ambitious new greenhouse gas reduction laws, which include methane emission reduction targets of 40 percent below 2013 levels by 2030. The states Air Resources Board says that much of the reduction should come from converting methane from cow manure into energy. Dairy manure accounts for about a quarter of the states methane emissions.

Dairy farms in the PRNS are proactive in wanting to leverage agricultural practices such as carbon farming to combat climate change - an increasingly urgent global concern for many American consumers, businesses and agricultural communities. Carbon farming is recognized globally as a solution to fight climate change. The regenerative agricultural practice of carbon farming is helping move carbon from the atmosphere and put it back into the soil. The pasture grasslands of an organic dairy farm in the PRNS are an ideal environment to implement carbon farming practices.

A new study by UC Berkeley scientists published in *Science Advances* illustrates that the pace of climate change can be decelerated by pulling carbon out of the atmosphere and putting it into the ground, where it serves to improve soil quality and increase water retention. This science strengthens the growing body of research that substantiates carbon farming as a global solution to combat climate change.

UC Berkeley scientists reported when combined with aggressive carbon emission reductions - the best scenario for limiting warming from climate change - the study found that improved agricultural management could reduce global temperatures 0.26 degrees Celsius - nearly half a degree Fahrenheit - by 2100. Source: <https://news.berkeley.edu/2018/08/29/improving-soil-quality-can-slow-global-warming/>

Losing a total of 24 dairy farms and ranches in PRNS could prove detrimental in the states battle against climate change.

2. The preferred alternative (B) and alternatives A, C, D, E, F, should entirely exclude ALL Tule Elk from the Ranchland Zone. Elk should be allowed on the PRNS but the Drakes Beach herd and the Limantour herd should not be present on the limited area of the PRNS which have ranches. Over the last 30 years, NPS has not effectively separated the elk from the cows. The elk consumption of forage and grasslands threatens the organic certification of ranches and dairy farms; the safety of the families and animals living on the land and the property; elk damage ranch fences; elk consume forage that would otherwise be available to support cattle. Elk were not part of the Dairy Ranches Historic Districts.

3. The DEIS failed to include the economic impacts to local communities, including housing, long-term leases for ranches and farms and a succession plan for the next generation of farmers in the PRNS. This omission is misleading to the public.

Purpose & Need, page 4 - NPS states:

In 2013, at the direction of the Secretary of the Interior, the NPS Director issued a Delegation of Authority authorizing lease/permit terms for up to 20 years and directing NPS to initiate a National Environmental Policy Act (NEPA) process to evaluate the issuance of long-term leases.

There is no mention of a NEPA process in either the Salazar directive or the Jarvis delegation of authority. The reason that NPS decided to initiate a NEPA process following the directive to renew leases for the same use that has been ongoing for over 150 years is still unknown to the public. 20-year evergreen leases in the GMP Amendment process to help stabilize our rural communities.

Allowing 60-year leases or 20-year evergreen leases in the GMP Amendment helps stabilize our rural communities and create economic viability and longevity for the ranchers. These leases would result in the stabilization of historic rural communities, allowing them to thrive both as rural economic engines and as conservation stewards, encouraging best ranch-management practices and motivating the next generation to continue producing food for the region.

By investing in a stable infrastructure for farmers and ranchers and offering affordable housing for working families then we can fully maintain best agricultural management practices, retain a stable labor force and make farming a viable profession for the next generation.

A decrease of ranches would result in a decrease of children in West Marin Schools, which are already struggling for attendance. Without ranches and rancher families, the diversity of the area would lessen. Many of the ranchers working in PRNS are Hispanic. Most of their children attend local schools, in fact, 55.3% (63) of students at West Marin Elementary are Hispanic. Source: StartClass. (2016). Retrieved from <http://public-schools.startclass.com/l/14074/West-Marin-Elementary>

The PRNS has not lived up to, has not followed, and has, in fact, changed the intent of the 1980 General Management Plan without public input or permission. The Park management has managed by neglect and has intentionally made farming and living in the Park nearly impossible. The NPS management is uncollaborative and unresponsive to allow farms to be able to farm responsibly and address proactively the enormous issues of climate change.

Our community has been decimated by the actions of the Park staff in eliminating jobs and housing. In 1998 there were 7 dairies and 21 beef cattle ranches. Today there are 6 dairies and 18 beef cattle ranches with 6 less farming families and many vacant buildings.

Over the past 50 years, more than 130 homes where rural families live, raise their children, and work as an integral part of Marins local agricultural economy have been torn down or abandoned when PRNS leases are terminated. Working families have been evicted and have left our area permanently to seek stable housing. This lack of housing, the uprooting of workers and disruption of essential community resources is destroying our schools, medical facilities, and other public services that rural populations depend on to survive. The Bay Areas housing crisis is a severe impediment to economic and social stability. It makes no sense to destroy housing when working families already struggle to have a place to live.

Without workers, our local food economy cannot thrive because farming and ranching in PRNS and GGNRA contribute to the stability of our entire County of Marin farm system. PRNS ranches and dairies account for nearly 20% (\$20million) of all gross agricultural production in Marin County. These ranches and dairies play a critical role in maintaining the viability of Marin County agricultural infrastructure and economic viability. Application of an Economic Input-Output Model to NPS farms and ranches would have an economic multiplier impact of nearly four (4) times the gross production values, or \$80 million.

A leasing policy that permits affordable, stable housing for families will keep good workers on our farms and ranches and create resilience for our agricultural community.

4. The DEIS inadequately addresses the ecological and economic benefits of pasturelands used by livestock and doesn't recognize livestock agriculture as a solution to climate change. Scientists have published extensive studies in support of livestock farming as a primary solution to reversing climate change. Livestock grazing has been shown to benefit California's grasslands by reducing the risk of catastrophic wildfire and maintaining habitat for native plants and animals. Grazing promotes soil health by restoring its carbon content, captures carbon dioxide from the air through photosynthesis, and has been described as the most effective mechanism known to humankind in addressing global warming. (sources: Drawdown Solution #19: Managed Grazing/Rodale Institute) [<https://rodaleinstitute.org/wp-content/uploads/rodale-white-paper.pdf> and <http://cesonoma.ucanr.edu/files/225913.pdf>]

Furthermore, a recent study from the University of California, Davis, found that grasslands and rangelands are more resilient carbon sinks than forests in 21st century California. The study indicates that grasslands should be given opportunities in the state's cap-and-trade market, which is designed to reduce California's greenhouse gas emissions to 40 percent below 1990 levels by 2030. [<https://climatechange.ucdavis.edu/science/climate-change-definitions/>] In addition to reversing climate change, carbon farming practices also work to improve crop and pasture productivity. When soils have more organic matter and provide proper nutrition, they naturally increase the volume of pasture production; and with increased pasture production, cows have more nutritional-rich grasses, and farmers can reduce outside feed costs. [See example below of an expense sheet from a working dairy farm in Marin County.]

5. The beneficial impacts to soils from carbon farming was not considered. The DEIS only considers adverse impacts to soils as a result of dairy farming and ranching. The NPS should consider carbon farming and the ecological benefits of implementing a carbon farm plan that would improve soils, increase soil carbon, and increase organic matter to benefit water quality and air quality. The NPS should consult with the Marin Carbon Project, Carbon Cycle Institute, and Marin Resource Conservation District who have expertise in this area. There is no excuse to ignore the beneficial effects of carbon farming.

6. Effective best land-management practices weren't adequately evaluated, analyzed and included in the DEIS. The NPS takes a passive approach to land management. The current model has not been effective at balancing the needs of the agricultural community and natural resources. We need to create a successful and replicable educational model within the PRNS and GGNRA operations that teaches the environmental benefits of organic agricultural practices, preserves natural resources and builds a local, regional foodshed. Ranches and dairy farms are perfect examples to educate urban populations about farms where sustainable food production and good land management go hand in hand. Only one hour from major urban areas of San Francisco, the Oakland and the East Bay, generations of children could become more connected to sustainable food and farming, with a lifetime of impact on their relationship to the land.

We need to reduce climate change by working with dairy farms and ranches to implement organic farming sustainability practices such as carbon farming as actionable solutions. Encouraging best management practices for farms is urgent. U.S. government climate scientists issued a report [<https://nca2018.globalchange.gov/>] warning that climate change is a growing threat to human life, ecosystems and the economy, and that greenhouse gas emissions reduction would avoid hundreds of billions of dollars in future damage.

We need to implement intensive rotational grazing practices that have shown benefit to native plant and animal species, eliminating arbitrary stocking numbers. Native plants and animals thrive on these Point Reyes farms, including six plant species federally recognized [<https://ucanr.edu/sites/uccemarin/files/31000.pdf>] as threatened or endangered, including the Tiburon Paintbrush, and animals such as the California Red-Legged Frog. [[https://www.nps.gov/pore/learn/nature/upload/animalspecieslist\\_endangered.pdf](https://www.nps.gov/pore/learn/nature/upload/animalspecieslist_endangered.pdf)]

Sensitive species such as the California Red Legged Frog and native grasses thrive on ranches where good management practices are in place, proving that wildlife habitat and ranching can be highly compatible.

The NPS should be proactive in allowing diversification of sustainable farming practices. The regions economy needs small-scale farms to succeed, and diversification will enable farmers economic stability and contributes to the regions food security.

The NPS needs to commit to installing small-scale methane digesters on dairies needed to significantly reduce methane emissions and create renewable energy. These methane digesters would be a part of climate change solutions available to dairy ranches in the PRNS.

Ranchers and dairy farmers can partner with the local Resource Conservation District (RCD) that can assist with the technical infrastructure and economic support that is needed to develop and implement a carbon farm plan. This recommendation is omitted in the current DEIS. Compost application is a simple and affordable element of any carbon farm plan. This practice isnt currently allowed in the PRNS. This practice helps fight climate change. Scientists have shown that increasing organic matter in the soil allows for more water retention and increased pasture and plant growth. A statistic presented by the Marin Carbon Project states that if farmers spread a quarter-inch of compost on just 50% of Californias rangelands, 42 million metric tons of CO2e would be offset, equivalent to all the energy use for commercial and residential sectors in California. [<https://www.marincarbonproject.org/home>]

The San Francisco Chronicle reports that if compost were applied over 5% of the states grazing lands, the soil could capture a years worth of greenhouse gas emissions from Californias farm and forestry industries, or the equivalent of removing 6 million cars from the road. [<https://www.sfgate.com/science/article/A-sprinkle-of-compost-helps-rangeland-lock-up-5832244.php>]

Sincerely, Albert Straus Founder/CEO & Organic Dairy Farmer Straus Family Creamery Marshall and Petaluma, California

#7241

Name: Konietzny, Martina

Correspondence: Point Reyes National Seashore protects a rugged and wild coastal peninsula and surrounding waters, connecting native ecosystems, enduring human history and recreational, scientific, and educational opportunities.

This above sentence is the essence of what Pt Reyes is for myself and many others in my family and circle of friends. I have lived in the Bay area for over 30 years and have always wondered about the amount of livestock inside a National Seashore.

It is past time to remove domestic livestock operations from Point Reyes and dedicate the Point Reyes National Seashore to it's original mission: the preservation of native plants and wildlife. Livestock operations were supposed to have been removed over a 25 year grace period. I can understand why the farmers keep on holding on, getting paid off and subsidized, have their children become farmers and heirs of "our" property. This needs to stop.

Furthermore I just found out that even the organic milk is produced under the most cruelest circumstances. The white plastic bins you see everywhere in Pt Reyes are to house the baby cows, the baby cows are after birth taken away from their Mother's, so the Mother can only produce milk for commercial use. I always expected the farmers in Pt Reyes to be a step up from the rest of the industry because I thought, they were kind, and wholesome and loving to all animals.

The ever shrinking space of natural habitat in Pt Reyes, and the cruel practices along with their ground devastation they need to be phased out immediately. They had their "hay" day, now it will need to go back to the public. Particularly right now we are in a climate catastrophe and the movement will be toward NOT eating meat at all.

Meat production is the biggest polluter on earth (the reason why the Amazon is on fire), as it pollutes our earth and atmosphere.

The approximately 600 native subspecies of tule elk are much more important to me and many visitors to this park than the 5,000 head of cattle which cause erosion, invasive species and pollution of the water, not to mention exacerbating climate disruption. I do not visit Point Reyes to see cattle! The idea of killing some of the tule elk is beyond ridiculous when there are only about 4,000 elk remaining in California out of a historic population of half a million. The 24 ranches still at Point Reyes need to be phased out and the land restored for native species. I support the adoption of "Alternative F". Thank you for listening, Martina Konietzny

#7242

Name: Phegan, Barry

Correspondence: I oppose allowing e-bikes on public lands. They are like motorbikes, heavy, fast, unnatural, dangerous. I've had many close calls with e-bikes on pathways and trails, coming silently up behind me and racing past, frighteningly. Sadly, many people have no sense of the rules or respect for others. Increasing their lethality is unconscionable. Barry Phegan

#7243

Name: Hodges, Mark

Correspondence: How have you managed to hide your actions for so long? I am guilty for living so close and being unaware, you but all are going to hell for your role in selling off this seashore to ranchers.

#7244

Name: James, Douglas

Correspondence: Updating the management plan last written in the 1980s had been a long and protracted process. In the meantime the population of the Bay Area has exploded. Point Reyes National Seashore was established along with other "urban" national parks to augment recreational opportunities for urban dwellers in centers nearby. It was never intended to be turned into wilderness. The release of tule elk first on the north point and then later in the pastoral zone in the main part of the park has not been a success. PRNS has not done a very good job of managing the herds. Several years ago ~34% of the herd on the north point starved to death due to lack of food. The concept that this is wilderness and these animals should fend for themselves is ludicrous. Due to the lack of top predators, wilderness at PRNS is just a human construct with no basis in reality. The Tule Elk experiment is more akin to a Wild Animal Park, similar to places in Southern California where visitors ride trams to view African wildlife. The difference here is visitors hike in to see the elk and the PRNS staff has had a hands off approach, which allows the herd to grow in size beyond the carrying capacity of the land. I have visited the north point from time to time. The plant life was/is in bad shape- over grazed. Also there were numerous places where concentrated animal use had led to loose soil and erosion.

What is more inhumane? Allowing these magnificent animals to decline in health and starve to death or periodically shooting a small percentage of the herd to maintain a healthy animal population appropriate to the carrying capacity of the land? Obviously, I am in favor of actually managing the elk herds so they remain healthy, with an appropriate ratio of males to females, and in such number that they have enough to eat without wreaking havoc on the plant life or hastening erosion by concentrated trampling.

THE OPTION I FAVOR MOST IS C. Remove the Drakes Beach Herd/ Keep the ranches.

I realize that this means killing animals, but this can be done humanely. The EIS offers "ALL or None" options because the public generally doesn't support killing animals (while they have no problem with hamburgers). This leads people to choose other options such as removing the ranches altogether. Fencing might be another option to keep elk away from ranches, but in the long run culling would still be necessary. There is also the recent discovery

of Johne's disease in the "wild" elk population. This highly infectious disease can easily be transferred to dairy or beef herds.

Treat the ranchers fairly and give them 20 year leases that were promised years ago under the Obama administration. A ranch operation cannot survive without access to capital. With the short leases and uncertainty of the last decade, ranchers have had a tough time getting loans to finance their operations. Plan and simple, a bank will not loan money on a 3 year horizon. This is the only fair option. This park would not exist if it were not for the 150 years of stewardship provided by the ranching families that occupied and worked these lands. Pt. Reyes without grazing animals wouldnt be Pt. Reyes. Ranchers have been innovative in managing their grazing lands, using techniques that foster sequestration of carbon in the soil. They have employed fencing to keep cows away from streams as well as other sensitive areas.

In closing I hope this almost 40 year process of deciding on how to manage PRNS comes to some final resolution. I have repeatedly been asked to comment on various plans and documents. Stop studying the problem and do something. Further delays are a waste of taxpayer money. This EIS alone cost us almost \$1M.

#7245

Name: Coffey, Allison

Correspondence: I am writing to urge the National Park Service to discontinue the grazing of beef and dairy cattle at Point Reyes National Seashore. This precious area has been damaged by livestock grazing which poses a threat to the environment and local wildlife and it should be protected and used to serve the public good, and not for the benefit of the livestock industry.

I strongly oppose Option B and any other proposal that would be fatal to Tule Elk or other wildlife to the benefit of ranching operations, and encourage the agency to adopt Option F to discontinue grazing and allow members of the public to enjoy this beautiful park and to be enriched with opportunities to visit and appreciate this special place.

#7246

Name: Miller, Louise

Correspondence: thank you for accepting public comments.

I am totally against any culling of the elk population. The elk need to be protected and be able to roam freely, with adequate water sources.

We must protect our wildlife at Point Reyes by all means. The elk and other wildlife have the right to be protected and they are very special for the enjoyment of Point Reyes.

I don't know how successful relocating some of the elk herd to other locations. May harm the elk.

Also, I feel we need to restrict ranching at Point Reyes because of environmental concerns and climate warming. Our climate is getting destroyed and cattle are a part of this equation. The Park Service needs to get with the current thinking and restrict cattle use on public land.

I also am concerned with the 246 elk that were killed due to dehydration several years ago. This is not acceptable. The elk must be allowed to roam free so water sources do not dry up and cause another disaster. The Park Service is responsible for this horrendous loss.

I understand many many years ago, cattle ranching was important for

#7247

Name: May, Nadine

Correspondence: I was born and raised in the Bay Area and have always enjoyed going to Point Reyes National Seashore, which is a true gem in the Bay Area, the United States and among national parks. We managed to bring back the Tule elk from the brink of Extinction. Why would the Park Service even consider harming them in any way, including killing any of them and further degrading and contaminating the environment in which they live. There is ample evidence that the dairy industry has polluted the water, contaminated the soil and otherwise devastated the environment of Point Reyes National Seashore. As a taxpayer, I strongly encourage The NPS to approve alternative F, which would gradually phase out the dairy industry at Point Reyes National Seashore and allow the seashore to go back to its original pristine environment, in which plants and animals of so many species would thrive. Dairy is a dying industry - - look at all the alternatives to dairy milk on supermarket shelves - - and is a huge contributor to global warming and climate Injustice. I encourage The NPS to do the right thing to restore Point Reyes National Seashore which will allow the Tule elk and all the other species there to survive and thrive. Allowing the Dairy Ranches to remain and even worse, allowing even more animals to be raised on ranches at Pt. Reyes means continuing devastation on our National Seashore. Please do not let that happen.

#7248

Name: Jones, Annette

Correspondence: These remarks are in response to the NPS seeking input on the General Management Plan Amendment (GMP) Draft Environmental Impact Statement (EIS) for Point Reyes National Seashore and the north district of Golden Gate National Recreation Area prepared for the National Park Services (NPS) to update management guidance of national park system lands and all lands currently leased for beef and dairy ranching.

The California Department of Food and Agriculture (CDFA) Animal Health Branch is the States organized, professional veterinary medical unit that protects livestock populations, consumers, and Californias economy from catastrophic animal diseases and other health or agricultural problems. The Branch addresses disease and other problems that cannot be successfully controlled on an individual animal or herd basis but require state-wide coordinated resources.

1. CDFA supports the continued monitoring and testing of elk herds for Johnes disease and chronic wasting disease (CWD) as listed for all alternatives on the EIS. Both conditions are on the Departments List of Reportable Conditions for Animals and Animal Products.

a. Johnes disease is an incurable diarrheal wasting disease that can spread between livestock and wild ungulates caused by the bacterium Mycobacterium paratuberculosis (MAP). Studies indicate that infection is very prevalent in dairy herds (about 68% of U.S. dairy herds have at least one cow that tests positive for Johnes). Although infection seems less widely distributed in beef and goat herds and sheep flocks, Johnes is of critical signigance to all livestock producers.

b.CWD, a regulated reportable condition causing a fatal neurological disease that infects cervids such as deer, elk and moose, has not yet been detected in California. The Branch supports the continued surveillane for this disease in the NPS elk because of its potential spread to California.

2.CDFA encourages the dairy and beef ranchers impacted by this EIS to enhance biosecurity and participate in disease monitoring programs. If diversification activities are authorized for ranchers (Ranch core subzones) as defined on the EIS Alternative B - NPS Preferred Alternative, biosecurity and disease monitoring programs may be needed in other livestock species (pigs, chickens, sheep and goats).

3.CDFA is concerned about Johnes disease exposed elk being moved to sites where they may have direct contact with domestic ruminants or indirect contact through contamination of the environment and subsequent use by domestic ruminants.

Thanks for the opportunity to comment.

#7249

Name: Kitahara, Miya

Correspondence: I. Alternative F is the Most Appropriate Use of National Park Service Lands.

Although the EIS describes the enabling legislation that allowed ranching to persist to the present day and allows permit extensions, the NPS continues to have the responsibility to act in the best interest of the public and preservation of ecological function and native species (NPS Management Policies 2006).

The purpose of the NPS is to conserve the scenery and the natural and historic objects and the wild life 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, and it is the role of the Service to promote and regulate the use of Federal areas for these objectives (Organic Act, 1916).

Of the General Management Plan Amendment Alternatives, only Alternative F honors this responsibility. Specifically, Alternative F is the option which most responsibly conserves wildlife, provides for public enjoyment, and preserves the lands unimpaired for future generations.

## II. Alternative F is the Most Appropriate Alternative for Conserving Wildlife

The overpopulation of Tule Elk cited for the need for intervention is a result of prior human intervention in the ecosystem. To cull the herd while not preserving the other aspects of the ecosystem - contiguous land access and reintroduction of other ecosystem species - amounts to continued intervention that deteriorates the natural objects and wildlife habitat in the area. Alternative methods of population regulation should be explored. As ecosystem specialists, NPS experts should be directed to balance Tule Elk populations using ecological solutions (e.g. <https://www.nature.com/scitable/knowledge/library/dynamics-of-predation-13229468/>).

## III. Alternative F is the Most Appropriate Alternative for Providing Public Enjoyment and Unimpaired Enjoyment of Future Generations

Alternative F provides the most robust build out of infrastructure and services for public use and enjoyment, including additional planning above the scope provided for Alternatives B-E, and represents an improvement over Alternative A.

Any expansion or continuation of land- and ecosystem-degrading operations within NPS lands represents a failure to leave them unimpaired for the enjoyment of future generations. Alternative F will lead to the greatest chance of future generations to enjoy the park.

Furthermore, the greatest threat to future generations ability to enjoy NPS lands is climate change. The impacts of climate change are expected to deteriorate the quality and resilience of coastal areas, as well as cause sociopolitical instability which could undermine the ability for future generations to enjoy the benefits of national parks. In order to claim acting in accordance with not impairing enjoyment of future generations, all actions within NPS control must be taken to mitigate climate change. Alternative F is clearly the preferable alternative for reducing total GHG emissions, eliminating all 24,611 annual MTCO<sub>2e</sub>, which is equivalent to 20% of total agriculture emissions presented in the County of Marins 2017 GHG emissions inventory. Eliminating these emissions is the most responsible course of action.

To further augment its beneficial contribution to drawing down carbon from the atmosphere, Alternative F could consider inclusion of the mitigation strategy of Carbon Farming (EIS p.190) if determined undisruptive to ecosystem and wildlife habitat restoration. While some benefits are shown from livestock integration in carbon farming plans, many of the sequestration benefits can be gained without livestock, such as woody plantings,



herbaceous cover, and compost application (see comet-planner.com). Inclusion of livestock may be effective and appropriate on private lands, but it is not necessary on NPS lands.

#### IV. Ranching Facilities at PRNS Should Be Treated as Historical Objects

It is within the purview of NPS to conserve historical objects. The Historic Ranch Preservation subzone in Alternative F would serve this purpose. Ranching activities should be appropriately classified as historical activity, an artifact of decisions made prior to formal planning processes and without currently available data and science indicating the importance of ecosystem restoration and GHG reduction. Ranching activities should therefore not be continued on into the future. Furthermore, choosing to preserve and expand ranching based on historical significance demonstrates a culturally insensitive bias. The PNS land was actively managed prior to ranching by native populations, and yet evidence of their existence and relationship to the land is limited to a small display at Bear Valley Visitor Center. The historical objects dedicated to ranching should be appropriately proportional to the duration of time it represents, such as limiting it to Pierce Point Ranch.

#### V. The Interest of the Few Is Not More Important Than Public Interest and Conservation

There is no explanation in the EIS that identifies barriers to choosing Alternative F that cannot be overcome. The EIS identifies the potential loss of revenue and employment under Alternative F as representing only 0.01% of the study areas gross regional product, and 0.03% of regional employment, and does not undermine the visitation levels for public enjoyment. Choosing an alternative other than Alternative F would require a determination that advancing the interest of a few is a greater responsibility to NPS than protecting ecological resources and serving the public interest of current and future generations.

#7250

Name: Pirrone, Annette

Correspondence: NPS, I support the continuation of sustainable farming and ranching in the Seashore and GGNRA. I trust that all parties have the wisdom and integrity to work together for the best results, for the future of the precious land and all communities.

Thank you, Annette Pirrone

#7251

Name: McClelland, Jolynn

Correspondence: R & J McClelland Dairy Operating on the Historic L Ranch in Point Reyes National Seashore

September 21, 2019

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

Dear Superintendent,

I appreciate the opportunity to comment on the Point Reyes National Seashore (PRNS) and North District of Golden Gate National Recreation Area (GGRNA) Draft Environmental Impact Statement (EIS) for the General Management Plan (GMP) Amendment dated August 2019. I am a fourth-generation rancher to operate on the lands of the Point Reyes Peninsula. My great-grandparents, JV and Zenia Mendoza, migrated here from the Azores in the early 1900s. They met while living on Point Reyes, were married, and started their families and businesses on the A and B Ranches. My grandparents, Joe and Scotty Mendoza, purchased the L Ranch in the 1950s and ran a dairy farm there until their passing. Since 2011, my husband and I have been milking

approximately 150 head of certified organic dairy cattle. We employ three full time employees who reside on the farm along with their families.

Before I begin, I would like to bring to your attention my endorsement of the Point Reyes Seashore Ranchers Association (PRSRA) letter that has been submitted during this comment period. I strongly urge you to consider and act upon all of the points raised in that letter. That letter represents the thoughts and needs of many of the dairy and beef cattle ranchers within the Seashore and GGNRA that the PRSRA represents-the historic L Ranch being one of those ranches.

I was encouraged to see the alternative that the Park chose as its Proposed Action included the ability for us to continue our historic ranching practices. With the recent designation by the Department of the Interior of the Point Reyes Peninsula Dairy Ranches Historic District and the Olema Valley Dairy Ranches Historic District on the National Register of Historic Places, I applaud the Park for aligning with this distinction. The historic ranches in the Seashore provide a longstanding cultural and historical resource.

In order to allow the ability for PRNS and GGNRA to honor the historical, cultural, social, educational and environmental benefits of our ranching heritage, I do want to take this opportunity to point out a couple of key topics that need more clarification or consideration. These are also important points of interest for the historic L Ranch:

1. Drakes Beach and Limantour Tule Elk herds- The number of Elk that have been suggested as a population threshold is not a number that aligns with the ability of the ranches to remain viable. For example, all of the dairies in the Seashore are certified organic, which means we have to feed our cows a certain amount of pasture in order to maintain our certification. The Elk compete for that pasture. We will have a difficult time continuing to provide the public with a historic visitor experience if we are not able to keep a certification that we depend on in order to stay in business. The idea of enticing the Elk out of key pastures with hay or hazing would not allow this majestic animal to exist in its most natural state. The agricultural properties in PRNS and GGNRA only represent 30% of the land that the Park oversees. These animals should be allowed and kept, with the help of fencing, in the other 70% of lands the Park manages in order to allow these animals to live as close to nature as possible. Furthermore, even with the Elk returning to the Wilderness Area, there needs to be a total population size within the Park established in this EIS in order to make future management decisions an easier process.
2. Diversification-More work needs to be done on the topic of allowing diversification. The impression has been given that what the ranchers have proposed are never before uses of these lands and that we want to make major large-scale changes. These points are far from the truth. There needs to be more research on the history of Point Reyes highlighting the diverse groups of animals and crops that were raised-historical uses that the ranchers would like the flexibility to return to. We are in an ever-changing climate and global market place. Some of our operations may cease to be viable in another five, ten years. Having the option of bringing in other species of livestock and/or crops would help us add to the visitor experience. Different species of animals would also allow us to be a partner with the Park by helping manage grasslands, brush and help alleviate the risk of wild fires.
3. Leases-there is concern with language in the lease addendum that would require lease holders to physically live on the property. To being with, not all of the ranches would be able to accommodate this due to there being no housing on the property. That is an unfair disadvantage to those lease holders. Many people all across America commute to their places of work every day, some spending hours in their cars. Ranching is a career that should not be looked at in a different way. There are numerous examples inside and outside of the Park that showcase a successful ranch can be run with the operator off-sight. Just because an operator lives off sight, does not mean that they are unable to be a responsible steward of their operation. Historically before and after Point Reyes became a National Seashore there are examples of operators who did not live on the land they managed. It would also add another burden to PRNS to have to monitor where lease holders reside.
4. Advisory Committee-An Agricultural Advisory Committee should be established that is made up of local agriculture and natural resource conservation groups in order to offer assistance to the Park when managing Agricultural topics.

The Point Reyes National Seashore is a unique example of government and ranchers working together to protect the land and continue to produce high quality food for a growing population. During the 1900s more and more

families left the farms and countryside to move into the suburbs. We are now meeting people who are three, four, five generations removed from the farm. PRNS can continue to be a place that not only protects the natural landscape, but highlights the cultural and historical landscape as well. PRNS can give visitors the opportunity to experience a way of life that is the backbone of American history and to learn where their food comes from. In order to keep this longstanding tradition going, the NPS has the opportunity right now to develop a plan that balances the needs of the natural landscapes, and of this vital historical and cultural resource.

Thank you for the opportunity to participate in this process,

Jolynn McClelland L Ranch

#7252

Name: Young, Stanley

Correspondence: When my family and I were recently camping nearby Pt. Reyes we visited a trail and saw all the elk. My son was thrilled. I just told him that there is a plan that would allow people to shoot and kill elk. He asked why and I said it was for people to kill and eat another animal a cow. He asked wasn't the amazon just on fire because of cattle ranchers and loggers? I said yes, and now instead of allowing wild elk to roam free, you might shoot them for people to kill and eat another animal?

#7253

Name: Lowe, Margot

Correspondence: The EIS makes it clear that under all the alternatives for continued cattle ranching, there will be detrimental environmental consequences on the Park's natural resources, including soils, water quality, vegetation, and wildlife, including tule elk.

The National Park Service governing laws prohibit actions that will impair natural resources.

Consequently, the Park Service should not adopt any ranching alternative and prepare a supplemental DEIS with ranching alternatives that comply with applicable laws prohibiting the impairment of natural resources.

#7254

Name: Merrill, Charles

Correspondence: Hello,

I am a life long Marin resident and avid cyclist residing in Fairfax.

I am writing in support of the improvements in public and bicycle access outlined under Alternatives B, C, D, E, and F.

I rarely ride in the Pt. Reyes area as I find the paved roads highly traveled, unsafe, very dangerous for cyclists and with limited connectivity and/or loop options. Dirt options are so limited that my friends that live in Pt Reyes Station and Inverness usually drive to Fairfax to ride.

Respectful public access to a few ranch roads during daylight hours would make a huge difference to me and the rest of the taxpayers that continue to be denied access.

Specifically I would like to see connections using existing ranch roads between: - Devil's Gulch and Platform Bridge Road. - Bolinas Ridge Trail and Five Brooks Stables. - Drakes Estero and Abbotts Lagoon Trail. - Marshall Beach Trailhead and Pierce Point Road. - Bolinas Ridge Trail at Olema Hill and Point Reyes Station to serve as an interim connection for the Cross Marin Trail.

I would also like to see an Estero Trail loop using existing ranch roads.

I realize that this will take collaboration with ranchers and other stakeholders to educate the public and address concerns related to public access on working ranch lands. There are many fine local organizations ready to assist.

Best regards, Charles Merrill

#7255

Name: Maier, Jennifer

Correspondence: I oppose the DEIS as drafted as it relates to the removal of Tule Elk from Point Reyes. Tule Elk are ecologically critical part of the balance of the Point Reyes ecosystem. They live in harmony with other native species and are non-aggressive towards humans and other wildlife. Not only is the growing population of elk significant to the landscape of Western Marin, but also to the draw of tourists, hikers, and wildlife enthusiasts that frequent the trails, specifically the Tomales Point Trail that runs through the Elk Preserve. The free roaming populations of elk might exist in multiple groupings but are part of the same larger herd and should be protected as so. These tourists, hikers, and wildlife enthusiasts bring economic growth to the sleepy towns of Point Reyes, Nicasio, Inverness and Marshall that might not exist if that population is limited or capped as proposed by the DEIS.

Additionally, the Tule elk population is self-sustaining and only encroaches to areas outside the Preserve due not to the growth of the elk population, but to the growing presence of development, ranching and grazing in the area. It's these activities, not the population of elk that should be reduced and managed. Please allow the population to grow, exist and thrive freely in their naturally occurring habitat of Point Reyes. If their presence conflicts with extending the leases to commercial operations, then those leases should be modified to allow the elk population to not be killed off, capped or limited just to appease those commercial interests.

Thank you very much for considering these comments. The Tule Elk are a part of Western Marin heritage and should be protected, honored and respected as so. The public's interest in maintaining a growing and thriving elk population in Point Reyes should not be outweighed by the for-profit interests of local businesses, dairy farms, ranchers and commercial operations.

#7256

Name: Kupfer, David

Correspondence: I am a native of Marin County. I have lived and worked in Point Reyes, directing the Environmental Action Committee of West Marin. I have a keen understanding of the agricultural economy of West Marin as well as the history of PRNS. Let me be brief. The public lands and native wildlife on Point Reyes National Seashore and Golden Gate National Recreation Area need to be conserved - not replaced with cattle and commercial agricultural expansion. There is ample farmable land to be found outside of the National Park boundary's. The remains ranching families within the Park have been more than amply compensated for their land to the tune of hundreds of millions in today's dollars. The have been subsidized in recent years. I am all for rural regeneration of West Marin's agricultural economy. But i do not support this within the park boundaries. The long term environmental impacts are simply too great. The sanctity and character of the National Park concept is in danger. The PRNS' enabling legislation never granted ranchers access to federal land in perpetuity. Thank you for your consideration of my views.

#7257

Name: N/A, N/A

Correspondence: September 23, 2019

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

Subject: Comments on the PRNS GMPA Draft Environmental Impact Statement

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

The Marin RCD was created in 1959 with a specific mission in mind: "to conserve and enhance our natural resources. It is our belief that the health of the county's natural landscape is dependent upon a robust agricultural economy and the active preservation of our agricultural heritage. In addition, it is our firm conviction that the agricultural productivity of the county is dependent upon the diligent application of practices which conserve and enhance our natural resources."

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

The Marin RCD supports NPS's preferred Alternative B and offers the following comments on the Environmental Impact Statement:

1. Twenty-Year Leases. The 20-year lease option (identified in Alternatives B-E) supports and encourages continuous environmental stewardship. In addition to zoning, this long-term support structure will improve environmental stewardship and should be stated within the EIS under all alternatives. Furthermore, while the Marin RCD supports Alternative B, we strongly recommend options for renewal at least five years in advance of lease termination dates for the reasons mentioned below.

NPS ranchers have demonstrated a strong interest in the implementation of stewardship practices that have been slowed by short-term leases conflicting with long-term maintenance/monitoring requirements in state funding programs. Furthermore, when a rancher nears the end of a long-term lease, they are left in the same noncommittal predicament that disqualifies ranchers from applications. Environmental programs offered through the State Water Resources Control Board and CA State Coastal Conservancy require 20-year commitments whereas the Marin RCD requires a 10-20-year commitment.

A 20-year lease, with an option to renew at year 15 would enable lessees to qualify for stewardship programs on a consistent basis, regardless of lease year, and fosters a stewardship ethic that spans multiple generations. This type of commitment strengthens relationships and promotes the cultural knowledge of the land that is passed through the generations and melded together with NPS ideals to inform adaptive management.

2. Conservation/Carbon Farm Planning. The Marin RCD is pleased to find an overview of carbon farming contained within the EIS and we offer our support to provide this program as requested by PRNS and the ranching community. Carbon farming provides benefits to soil, water, air, plants and animals and it is our recommendation that these benefits should be further elaborated under Alternative B. The list of practices, promoted and streamlined under Alternative B (shown in Appendix D), combined with long term lease options

will incentivize conservation action and increase environmental results. Air Quality, in particular, will be improved with these practices in play, however Alternative B describes no change to air quality.

Carbon farming is on the rise. County, state and federal partners have been engaged with local ranchers to complete individual carbon farm plans that support a regenerative and resilient agricultural landscapes. The effort has generated 20 plans thus far and considerable interest amongst the ranching community, inside and outside the Park. Plans identify family/agricultural/ environmental goals followed by an inventory of natural resources, identification of areas of concern, and prescription of regenerative management practices for implementation agreeable to all parties (See USDA NRCS Carbon Farm Plan Guidance document: [https://efotg.sc.egov.usda.gov/references/public/CA/CarbonPlanGuidance 3-18.pdf](https://efotg.sc.egov.usda.gov/references/public/CA/CarbonPlanGuidance%203-18.pdf)).

The plans, developed with landowners, lessees and local practitioners, consider a variety of USDA NRCS conservation practices (as identified in GMPA EIS Appendix D: Management Activity Standards and Mitigation Measures) in the planning process including Prescribed Grazing, Range Seeding, No-till/Reduced Tillage, Fencing, Weed Management, Riparian/Wetland Buffers and many more. All areas of the ranch are inventoried; including soil health associated with pasture management, grazing management and invasive weed management. These are concepts supported by the State of California's Healthy Soils Initiative, the USDA NRCS Environmental Quality Incentives Program, Marin County Climate Action Plan and more recently, Drawdown Marin to improve air quality.

Planned practices are proven to improve soil health: increase water infiltration, reduce evaporation, moderate soil temperature changes, increase rooting depth, increase nutrient uptake, and improve the water-holding capacity for most soils ([https://www.nrcs.usda.gov/wps/portal/nrcs/detailfull/soils/health/mgmt/?cid=s\\_telpdrdb1257753](https://www.nrcs.usda.gov/wps/portal/nrcs/detailfull/soils/health/mgmt/?cid=s_telpdrdb1257753)). Many of the practices support our farmers and ranchers in enhancing sensitive ecosystems by planting native trees, shrubs and grasses (windbreaks, buffer strips, grassed waterways, hedgerows, riparian forest buffers silvopastures). They are designed to improve water quality by increased infiltration rates and decrease runoff, thereby reducing sediment and nutrient loading to streams. Carbon farming practices, when managed well, offer exceptional greenhouse gas reduction and carbon sequestration benefits. The application of organic amendments to soils has the ability to sequester and increase soil carbon by 50 MT C per ha-1 in the top meter of soil (Ryals et al, 2015. Ecological Applications, 25(2): 531-545).

Furthermore, Alternative B provides a connection between the public and agriculture. The connection of greenhouse gas impacts from NPS visitors and potential offsets from agricultural carbon sequestration practices could be an incredible educational opportunity to the greater public in describing the co-benefits that agriculture can provide in a natural setting.

3. Appendix D: Management Activity Standards and Mitigation Measures. The Marin RCD is pleased to find the use of our Marin RCD Permit Coordination Program, along with the identification of additional management practices identified in the EIS. Considerable effort was devoted to the development of this program while working with local partners to identify management practices and environmental mitigation measures specific to our agricultural areas in Marin County.

In reviewing the practice list, we notice specific practices have been removed from consideration which, under certain circumstances, may offer additional environmental benefit. We recommend they are included also as a matter of consistency amongst programs and to provide the following environmental benefits:

Mulching (484) The application of a uniform layer of straw, wood fiber, or other acceptable materials over seeded areas or over bare areas if seeding is delayed to reduce erosion and stabilize areas while seeding is established.

Hedgerow Planting (422) A dense woody vegetation planted in a linear design to achieve a natural resource conservation purpose to protect water quality, wildlife, air, aesthetic value.

Silvopasture (381) An application establishing a combination of trees or shrubs and compatible forages on the same acreage to provide forage for livestock, increase carbon sequestration, improve water quality, reduce erosion, enhance wildlife, provide shade for livestock.

Conservation Cover (327) Conservation cover is establishing and maintaining perennial vegetative cover to protect soil and water resources on land retired from agricultural production or other lands needing permanent protective cover that will not be used for forage production.

4. Elk Management. While the Marin RCD supports the proposed elk management strategy, the EIS does not adequately represent farming losses associated with elk interaction on the ranches, damages associated with forage and silage in addition to fences and other infrastructure associated with their movement within the Range and Pasture Zones. The EIS should include a discussion of these impacts incurred by the ranches to adequately represent the economic loss associated with this option.

The Marin RCD strongly supports these ranchers and NPS in being national models of sustainable land stewardship and we offer our assistance whether in planning or project development. Thank you for the opportunity to provide comment.

Sincerely,

Nancy Scolari Executive Director

#7258

Name: Carey, Brenda

Correspondence: I do not support granting 20 year leases to cattle and dairy industry. Climate science has indicated we have less than 12 years to mitigate the worst of climate catastrophe. Allowing business that has been linked to water pollution, species extinction and in Point Reyes is the culprit of over 60% of the greenhouse gas emissions, it is not a good idea to give that same industry a 20-year lease to continue degrading our national park. Point Reyes is a refuge to thousands of plants and animals. Point Reyes can be a leader in the fight for climate justice, and it starts with phasing out Beef and Dairy operations and restoring the land to its natural state. The EIS has NO MENTION of the effects of climate change in it, and does not include any information of the cattle and dairy's impact on climate change within the park.

#7259

Name: Knypstra, Linda

Correspondence: Cattle are not a native species, nor protected, nor do they contribute to the ecosystem, and the new, expanded use that will included sheep, goats, pigs and chicken will not either in the Point Reyes National Seashore. Leave the Tule Elk alone and stop the Welfare Rancher's War on Wildlife.

#7260

Name: Nugent, Nanci

Correspondence: We need to take care of every living creature. We are all here for a reason. Protect all them

#7261

Name: Voss, Rene

Correspondence: Pt. Reyes DEIS Comments by René Voss

1. All ranching alternatives proposed in the DEIS violate federal laws to protect National Parks, and only Alternative F or phasing out all ranching and dairy operations comply with the law.

Under its governing legislation-including the Point Reyes Enabling Legislation, the Point Reyes Act, the Park Service's Organic Act, and the National Park Service and Related Programs Act-the National Park Service is obligated to manage the Point Reyes National Seashore consistent with the overriding legal mandates that the National Seashore's wildlife and natural resources receive "maximum protection" and be left "unimpaired for the enjoyment of future generations." 16 U.S.C. § 459c-6(a); 54 U.S.C. § 100101(a) (previous version at 16 U.S.C. § 1). Only Alternative F, which phases out ranching, can comply with these legal mandates. Ranching within the National Seashore is not mandated by any law, and in fact was intended to be phased out under current law (see Pub. L. No. 95-625, § 318(b), 92 Stat. 3487 (1978) (codified as amended at 16 U.S.C. § 459c-5(a))), and so choosing any alternative that allows the continuation of ranching and other activities that hinder the legal mandate to provide maximum protection to wildlife and natural resources in Pt. Reyes National Seashore violates federal law.

2. Any ranching activities that continue polluting the designated Phillip Burton Wilderness, and especially Drakes Estero, violates federal laws.

The Park Service, in the DEIS, admits that cattle grazing and ranching operations have caused and are continuing to contribute to water quality degradation through manure and waste runoff, which includes polluted runoff into Drakes Estero and other portions of the Phillip Burton Wilderness. These discharges violate the Wilderness Act. Moreover, the Park Service has failed to analyze the adverse effects from the runoff/pollutants on the wilderness character or natural conditions in the Drakes Estero and other portions of the Phillip Burton Wilderness.

In 1976, Congress designated more than 33,000 acres, or nearly half of the National Seashore, as Wilderness and potential Wilderness. See Pub. L. No. 94-544, 90 Stat. 2515 (1976); Pub. L. No. 94-567 § 1(k), 90 Stat. 2692, 2693 (1976). This included Drakes Estero; and with the removal of the oyster racking the Estero became fully protected as wilderness.

The Wilderness Act defines Wilderness as an area that is "protected and managed so as to preserve its natural conditions ...." 16 U.S. Code § 1131(c). These natural conditions are being degraded by the continued discharge of nitrates, e-coli, and other pollutants from ranching operations. Moreover, these discharges adversely affect the wilderness character of Drakes Estero and other portions of the Wilderness, in violation of the Wilderness Act.

3. The DEIS has failed to conduct an adequate analysis on the effects of continued subsidies on other dairy and ranching operations outside Pt. Reyes, which violates NEPA.

Effects from continued subsidies in the form of reduced fees and favorable lease terms on the local operations of competing dairies and ranches has not received a proper analysis in the DEIS. In its environmental and economic analysis for a new general management plan, the National Park Service must consider the economic impacts of ranching on the dairy industry both locally and regionally. The current proposal and ongoing subsidies in the form of below-market rate grazing fees and leases force us-the owners of this National Park-to subsidize dairy operations on public lands, since ranchers are charged significantly lower grazing fees and receive favorable leases in Point Reyes as compared with nearby private land operations.

Dairies in Marin County and regionally, outside of Pt. Reyes, are struggling. Dairy farms in Marin, outside the park, may not survive the pressures on the organic-milk market. See <http://tinyurl.com/y8jlluea> (Sept. 7, 2018, North Bay Business Journal). And Marin's dairy price slump is dragging the farm sector down. See <http://tinyurl.com/y8me7lg3> (June 22, 2018, Marin IJ). The current subsidies in Pt. Reyes means we are propping up an industry in a National Park that dumps more milk into a slumping market to the detriment of nearby private dairy operations. The Park Service must consider and study these economic impacts as part of the analysis.



I urge the Park Service to ALTERNATIVE F: NO RANCHING AND EXPANSION OF TULE ELK IN THE PLANNING AREA. This is the only long-term sustainable alternative that protects our National Park as required by law and the original intent of creating Pt. Reyes National Seashore as a National Park.

Respectfully,

René Voss

#7262

Name: Kacmarcik, Kelle

Correspondence: September 23, 2019

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

RE: Comments on General Management Plan Amendment EIS for Point Reyes National Seashore

Dear Superintendent,

WildCare is a nonprofit organization located in Marin County. Our programs include a licensed wildlife hospital, environmental education, advocacy and humane nonlethal wildlife conflict resolution. Our programs and services extend to all nine Bay Area counties. Every year we treat nearly 4,000 wild animals of more than 200 species in our wildlife hospital, and educate over 35,000 children and adults through our environmental education programs.

On behalf of WildCares 20,000 members and supporters, I am writing to provide comment on the General Management Plan (GMP) Amendment EIS for the Point Reyes National Seashore (PRNS).

The public lands of PRNS are hunting and feeding grounds for predatory birds and mammals, and many other species of wildlife including Tule elk. The Park Service's Amendment to the General Management Plan EIS must prioritize protecting these natural resources of PRNS.

Any cattle-ranching and other agricultural operations on these public lands must be managed to accommodate elk and other native wildlife, and should not harm wildlife habitat. We are opposed to the removal of any Tule Elk from PRNS. Commercial lease-holders should not be allowed to dictate removal or exclusion policies of wildlife on our public lands. Like any other property owner or tenant, when the lease holders activities carried out on the property attract unwanted attention from wildlife, the lease holder must bear the responsibility to mitigate those attractants and/or to restrict access.

We urge you to reject any conversion of National Park lands to row crops or expansion of commercial livestock farming to introduce sheep, goats, turkeys, chickens or pigs. Any conversion of these public lands to agriculture will only increase conflicts with wildlife, and further degrade wildlife habitat and water quality.

We appreciate the opportunity to provide our comments on the GMP EIS and encourage the National Park Service to protect and preserve wildlife, including the entire PRNS population of Tule elk, as well as to have the insight to implement a humane, long-term and sustainable plan which requires tenants to mitigate any conflicts with wildlife, including the growing population of Tule elk-wherever they may roam.

Sincerely,

Ellyn Weisel Executive Director

#7263

Name: Chau, Rocky

Correspondence: Please protect native wildlife in Point Reyes, like the Tule Elk, from being killed to promote cattle grazing.

#7264

Name: Shook, William

Correspondence: Comments on the alternatives to the Point Reyes National Seashore Draft General Management Plan EIS

The overarching question regarding the EIS alternatives to the PORE GMP are as follows

what was the original intent of the PRNS enabling legislation How was this affirmation altered to allow continued ROU for dairy and beef operations What is the highest use of this public land for the use and enjoyment of the public

Clearly, the intent of Congress was to preserve and protect for the use and enjoyment of the public of disappearing undeveloped coastlines of the United States. This is evident given that Congress authorizes set terms of ROU and SUP to ranchers of 25 years and in some cases 30 years or to be terminated upon the death of the the owner and/or spouse. While there have been amendments, to these terms over the years, that does not preclude further amendment of the legislation to insure the higher purpose of this public land

In addition to the amendments, there are questions regarding how the decision was made at the expiration of the ROUs in 1987 to extend them as leases.

Lastly, in this age of climate change, what is the highest and best use of this land. Cattle ranching at Point Reyes has contributed to the destabilization of major ecological and hydraulic systems within the seashore. Dairying contributes considerably to the discharge of methane, a gas more powerful than CO<sub>2</sub> in trapping heat in the atmosphere. Dairying requires continual migration daily to concentrated location that poses severe impact to soil and water resources. Supplemental feeding of dairy cattle has also contributed to the use of till/no-till production of forage crops that have introduced invasive plant species and contributed to soil erosion. The Seashore has dedicated considerable resources over the years combating invasive plant and animal species, restoring damaged streams, revegetating impacted areas and reintroducing threatened and endangered apex species extricated by ranching operations.

To state my concerns in a nutshell; the ranchers were paid substantial sums of money for the purchase of their land with the ability to continue their occupation for a time certain in exchange for the tax payer dollars they received. The overarching intent of Congress was to preserve and protect the Seashore for the use and enjoyment of future generations. Also, the original intent of the enabling legislation pertained to ranching and dairying, not the production of pigs, chicken, goats or other domestic species. It seems counter productive to perpetuate an activity that entails significant disruption to the native ecosystem while at the same time contributing to the destabilization of the climate.

Given all of these concerns, of all the alternatives presented in the Draft GMP EIS; Alternatives E and F are the most appropriate and inline with the NPS mission and would contribute, in a small but important way in leading toward a more sustainable future.

#7265

Name: Watts, Jamison

Correspondence: September 23, 2019

GMPA EIS C/o Superintendent Cecily Muldoon Point Reyes National Seashore 1 Bear Valley Road Point Reyes Station, CA 94956

RE: Point Reyes National Seashore General Management Plan Amendment - Draft Environmental Impact Statement Review Comments

Superintendent Muldoon:

Marin Agricultural Land Trust (MALT) was founded in 1980 to protect Marin's agricultural land for agricultural use. Over the past 39 years, MALT has invested over \$89 million to permanently preserve the agricultural utility and natural resources on 86 Marin farms and ranches totaling more than 54,000 acres. MALT works regionally with agricultural landowners and public and private partners to support and enhance agricultural viability and sustainability. One-third of Marin County's land is in productive agricultural use, including approximately 28,000 acres in Point Reyes National Seashore (PRNS) and the Golden Gate National Recreation Area (GGNRA). These family farms and ranches and the agricultural landscape they occupy are fundamental parts of the extraordinary and unique history, culture, environment, economy and character for which West Marin, Marin County and PRNS are known regionally and nationally. MALT Supports NPS's Preferred Alternative (Alternative B) Subject to the comments below, MALT supports the National Park Service (NPS) preferred alternative (Alternative B) identified in the Draft Environmental Impact Statement (DEIS).

1. Establishment of 20-year leases. Preferred Alternative B contemplates the establishment of 20-year leases for the existing agricultural operations within the planning area. MALT agrees with the establishment of 20-year leases because they will give the operators the certainty of tenure necessary to invest in the long-term success of their operations, including necessary ranch infrastructure improvements, improvement and diversification of agricultural operations and improvements to natural resource values. Assurance of tenancy through 20-year leases is critical to the ranchers' ability to secure financing, make necessary improvements, and implement beneficial stewardship practices. The Marin Resource Conservation District and the Natural Resources Conservation Service (NRCS) require 10-20 year maintenance and monitoring agreements to qualify for their programs. However, the DEIS does not address what happens to the leases established by the General Management Plan Amendment (GMPA) after the conclusion of the proposed 20 year lease period. The DEIS dismissed analysis of rolling leases because they have "no fixed termination date," are "... not consistent with ranching in a setting as complex as the planning area...", and "...the 2013 Secretarial delegation of authority to NPS and Congressional guidance directed NPS to consider issuing leases with 20-year terms." NPS has provided a copy of the Draft Agricultural Lease/Special Use Permit (draft lease) in response to prior public comments. The draft lease, on page 9, Section 5.3 contemplates an extension of the lease:

"5.3 Six months prior to the Expiration Date of the lease, NPS may offer this lease, or a similar lease, to Lessee. If Lessee fails to execute a subsequent lease prior to the Expiration Date, the Provisions of this Lease regarding Lessee's obligations to surrender and vacate the Premise shall apply. Lessor has no obligation to offer a subsequent lease to Lessee."

The DEIS does not address the conditions necessary for NPS to "offer this lease or a similar lease, to Lessee." Nor is it clear what the term of a subsequent lease may be. This will lead to uncertainty for the future of ranching operations in the planning area after the 20 year leases reach their term and could lead to unnecessary future litigation. The public should understand the conditions and terms of "this or similar lease" that may be offered to the lessee as well as the conditions that would lead NPS to not offer such lease to the operator(s). MALT strongly recommends that NPS address this issue in the final GMPA EIS. The MRCD and NRCS require 10-20 year maintenance and monitoring agreements to qualify for their programs. The preferred alternative should include 20-year rolling leases, which would enable lessees to qualify for these programs on a consistent basis and make them more eligible for bank loans to fund necessary improvements. MALT's recommendation is that NPS commit to rolling the leases over through a 20-year renewal process, with at least one year of advance notice, if the lessee meets all existing lease and ROA performance standards.

2. Lease appraisal process. Under the NPS preferred alternative (Alternative B) NPS proposes to implement a "master appraisal process managed by the US Department of Interior (DOI) to determine the FMV for park ranch operations." MALT staff could not find guidelines for such "master appraisal process" on the DOI's website or in the Uniform Standards of Professional Appraisal Practice (USPAP). Without a clear guide, the "master appraisal process" will likely lead to lease values that are fair for some leases but may not be economically viable for others and could make leases unaffordable for some operators. The final EIS should clearly explain the appraisal process for the proposed 20-year leases. MALT encourages NPS and DOI to design an appraisal process that is equitable to all of the lessees, given the significant mitigation measures that would be required for ranching activities authorized under the preferred alternative. The costs of implementing these measures should be considered for each lease when DOI appraises the value of the potential leases.

3. Stewardship of agricultural lands in the planning area. The NPS preferred alternative (Alternative B) identifies future authorized activities within the planning area, including modest agricultural intensification in the Ranch Core and Pasture planning subzones. The DEIS requires mitigation measures be incorporated into individual Ranch Operating Agreements (ROAs) for each activity. Further, many mitigation measures require consultation with NPS staff before activities can occur. Specific activities for each of the 31 leases will be authorized in the ROA for each lease and there seems to be no comprehensive planning effort designed to be completed for each ranch. MALT recommends that NPS make it clear through the GMPA and EIS that lessees in the planning area are allowed to work with qualified resource professionals, including the Marin Resource Conservation District, the Marin Carbon Project and/or USDA NRCS to complete conservation plans or carbon farms plans for their lease. MALT believes these plans will help NPS and the lessees to write ROAs that appropriately mitigate activities authorized in the planning area.

MALT also recommends the GMAP and final EIS specifically authorize "carbon farming," an important new planning process that identifies a collection of practices designed to maximize the land's ability to sequester carbon and reduce greenhouse gas emissions while making farmland more resilient to a changing climate. A Carbon Farm Plan outlines all of the practices that a particular ranch can use to sequester carbon and reduce greenhouse gas emissions. Some of these practices are big long-term goals, while others may be near-term priorities. A Carbon Farm Plan serves as a guide for a rancher to see the potential climate benefits on their property, the many other benefits these practices can have on their productivity and the environment, and potential funding partners to help implement these practices. Carbon farming practices also provide many co-benefits beyond sequestering carbon and reducing greenhouse gas emissions. Practices are designed to benefit the natural environment and the agricultural operation. Some examples include:

- Increasing carbon in the soil reduces soil erosion, promotes plant growth, and helps the soil hold on to more water. That means plants can grow longer into the dry summers, produce more forage for livestock and sequester even more CO<sub>2</sub>.
- Restoring creek vegetation increases wildlife habitat, stabilizes creek banks, improves water quality and helps slow down and soak up heavy water flow.
- Rotational grazing promotes vigorous grasslands with deep roots, encourages native grassland species and improves productivity.
- Planting diverse windbreaks and hedgerows provides shelter to livestock and reduces the drying effects of wind, allowing pastures to stay green longer into the summer. They also increase wildlife habitat and provide species for native pollinators.
- Using a methane digester for manure generates gas that can be burned for electricity and results in a more stable waste stream for applying back to the land.

Information on USDA NRCS conservation planning services can be found at:  
<https://www.nrcs.usda.gov/wps/portal/nrcs/main/national/technical/cp/>

4. Succession. Separate from the DEIS, NPS has provided a draft "Succession Policy for Ranch Operations within the Ranchland Zone for Point Reyes National Seashore and the North District of Golden Gate National Recreation Area" that would be used in the event "that named Lessees: (i) do not wish to enter into a lease/permit; (ii) cannot agree upon an arrangement among named lessees for continued operations under a new lease/permit, (iii) have not consistently met performance standards for the agricultural operation and other named Lessees are not willing to take on responsibility for improved operations;" MALT applauds the draft succession plan because it would help to ensure the succession from current to future agriculturalists in the planning area and puts a clear emphasis on selecting those producers that have a proven track record of operating pursuant to their ROAs. We recommend that the GMPA and final EIS specifically include this succession plan so the public can be aware of the terms and conditions of lease succession.

5. Management of Tule Elk. Management of Tule Elk has become an issue of concern for the public and the agricultural community, and rightly so. In prior planning and management documents, NPS did not contemplate or plan for expansion of the elk into the pastoral zone. Lack of funding for ranch improvements and the uncertainty caused by not having long-term leases helped lead to the unplanned establishment of these herds. Wilderness designated lands and leased ranchlands should be given equal protection corresponding to their intended use and purpose. Intended for nature preservation, wilderness areas are managed by NPS resource specialists. Conversely, leased ranches are intended to be managed for agricultural use by the lessee, with support from NPS staff. There should be little allowance for shared resource use and management styles between them. When livestock are found in Wilderness, they are removed. Likewise, when Elk are found on leased ranches, management methods should be used to control their population and remove their impacts.

6. Appendix D - Mitigation Measures. A partner in the long-term stewardship of Marin County's agricultural land, MALT appreciates the fifty-two pages of best management practices and mitigation measures included in Exhibit D. As these mitigation measures are "mandatory when implementing any of the activities" allowed in the planning area, the GMPA and final EIS should incorporate an "adaptive management" framework that would allow the practices and mitigation measures to be updated over time. Both NRCS and MRCD update their practices periodically to keep up with current science and industry standards.

7. Costs of implementing mitigation measures. The DEIS does not provide the lessees or the public with any guidance on how the implementation of mandatory mitigation measures will be funded. Many of the mitigation measures required in the Appendix D require a species level survey performed by a "qualified biologist." For example, regarding American badger, the document states in part, "conduct a preconstruction survey for the American badger prior to beginning work" (D-28). In addition, regarding Myrtle's silverspot butterfly, the documents states, "For all ranch activities, reconnaissance-level surveys would be performed by a project biologist to determine whether suitable habitat for Myrtle's silverspot butterflies is present in the project area" (D-30). MALT agrees that activities in the planning area should follow appropriate best management practices and mitigation measures but is concerned that lack of funding will prevent activities authorized by the DEIS. MALT recommends that the GMPA and final EIS identify sources of funding, including NPS funds, to assist the lessees with implementation of the mitigation measures.

8. Appendix D - Page D-4 Windbreak and Shelterbelt Establishment (380). Here, NPS identifies one of the many NRCS conservation practices that benefits soil and water retention, sequesters carbon and provides wildlife benefits. The practice as presented is modified to allow only "maintenance of historic windbreaks..." MALT suggests that NPS consider allowing the establishment of new windbreak or shelterbelts within the Pasture and Ranch Core subzones.

Thank you for considering MALT's comments to the GMPA Draft Environmental Impact Statement.

Sincerely, Jamison Watts Executive Director

Ralph Grossi Board Chair

#7266

Name: Rhodes, David

Correspondence: This "plan" to shoot Native Elk at the Point Reyes National Seashore is not a great idea and I hope that it does not happen. Thank you ! David Rhodes

#7267

Name: Fong, N/A

Correspondence: Please do not kill any tule elk. I like going to Point Reyes to hike, appreciate nature and various wildlife (not cows) and get away from urban life. I've also been volunteering with Point Reyes since 2012.

#7268

Name: Tsai, Hsin-Yeh

Correspondence: Wildlife should not be killed to allow money-hungry people to conduct destructive livestock grazing.

#7269

Name: Larsen, Susan

Correspondence: September 23, 2019

To: Superintendent Cicely Muldoon Point Reyes National Seashore

Re: Comments to Point Reyes National Seashore GMPA/EIS

I have lived in San Francisco for 17 years and have spent many beautiful days in Point Reyes National Seashore (PRNS). Over the years, friends from all over the world have visited me and Point Reyes National Seashore is one of the places that I make sure to bring them so that they can see and experience the beauty of this area and all of the wonderful wildlife that we share our environment with. Without exception, they are amazed at the beauty of Point Reyes and are always confused as to why there are cattle grazing in the park.

I have read the Draft General Management Plan Amendment and EIS and am disappointed that the Park Service has selected Alternative B as the preferred plan. I believe that no real consideration has been given to the any of the plans that would result in a phase out of the ranches. Questions that came to my mind when reading the alternatives are:

Length of leases: It is stated in Alternative B that, "NPS would issue lease/permits with up to 20-year terms to the existing ranch families to continue beef and dairy operations on approximately 26,100 acres." How are the lengths of each lease determined? What are the parameters used to determine the lengths of each lease? This statement is vague and offers the public no way of knowing what is required of the ranch operators for them to qualify for a lease renewal and for how the length of the lease is determined. Expansion of Ranchland zone: If Alternative B is implemented, the Ranchland zone would be expanded. Why? How does expanding the area open to beef and dairy operations benefit the public? There is no explanation provided as to why this expansion is needed or justified. It is common knowledge that tourism brings in millions of dollars in revenue each year. If ranching was phased out, the NPS states in Alternative F that, "...there could be additional opportunities for use of some of the vacant ranch complexes to support a higher level of visitation such as a car-camping campground, larger trailhead, and other visitor facilities." This would bring even more revenue for the park, and if done correctly, without a high environmental burden.

Soil degradation: One does not need to be an expert to understand the affects that grazing and dairy farming are having on the land at PRNS. The impact of the weight of these non-native species, the amount of grass they

consume, and the amount of manure the produce is clearly noticeable in the muddy, sparse fields they inhabit. According to the NPS, "Under alternatives A, B, C, and D, activities associated with beef and dairy ranching would continue to affect soils because of erosion, compaction, and alteration of soil fertility, primarily from livestock grazing, forage production, high intensity use areas, and manure spreading." Conversely, "Under alternative F, cessation of ranching would eliminate all impacts on soils associated with ranching activities. Impacts from public use and enjoyment and elk management under all the alternatives would be minimal in intensity and limited in scale." With so few wild spaces left, why would the NPS choose the alternative that would allow the continued degradation of the land when there are so many positive alternatives for the land that would benefit the public, the wildlife at PRNS, and the quality of our environment?

Water Quality: The NPS admits that cattle grazing and dairy farming negatively affect the watersheds in the area. The high amounts of E coli present in the area as a result of cow manure has the potential to negatively affect the elephant seals and the Coho salmon, as other wildlife that call PRNS home. NPS states, "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." Public use and enjoyment and elk management actions could have adverse impacts on water quality, but if foresight was used, this could be avoided. What we know definitively is that the current use of the land by beef and dairy farmers is having a tremendously negative impact on water quality. Why then does the NPS intend to not only continue these activities, but also to expand them? The NPS has not been able to adequately address the adverse effects the beef and dairy operations in NPRS currently have on the watershed, what is its plan to mitigate the increased impact the expansion of ranching will have?

Tule elk: The Tule elk is a species that is endemic to the PRNS. People from all over the world are in awe at the sight of these majestic animals. Because they are endemic, they add to the quality of the environment and help to balance an ecosystem. This cannot be said about the cows that inhabit PRNS. Alternative B calls for the lethal management of the Tule elk, and if implemented, would put the Drake Herd in immediate danger of culling. It is unclear to me who or what agency would be responsible for culling these animals. Would NPS employees be responsible, would hunting tags be provided to the public, or would an outside agency be contracted to conduct the culling? Additionally, it is unclear how the public or the ecosystem at PRNS would benefit for a reduction in the amount of Tule Elk and the expansion of ranching activities.

In addition to the points I have made above I am also concerned about the planting of non-native grasses in the park, the mowing of these grasses (which result in wildlife being killed), the treatment of the cattle, and the working conditions for ranch employees.

I am deeply disturbed that when I visited the public comment meeting in Sausalito there was an overall sense that the NPS has already made its decision and that the meeting was simply being held as a song and dance to make the public feel as if their voices were being heard. The manner in which the meeting was held did not allow for information to be clearly provided by the NPS as one had to queue up to speak to NPS employees. It was difficult to hear and crowded - these conditions did not allow for an adequate opportunity to discuss the matter nor to record comments the public had to offer. At no point in the Draft General Management Plan Amendment and EIS did the NPS adequately explain why they prefer Alternative B. I think the public has a right to this information.

In conclusion, I am formally voicing my opposition to the implementation of Alternative B and my support for Alternative F.

Thank you, Susan A. Larsen

#7270

Name: N/A, N/A

Correspondence: I have been a frequent visitor to Pt. Reyes National Seashore for 20 years, and have seen

dramatic changes over the years due to ranching activities. The Pt Reyes ecosystem provides visitors with opportunities to see a multitude of bird species, bobcats, coyotes, Tule elk, seals, and even whales just offshore. I am angry when I see the cattle feed lots, with their lack of vegetation, that seem to be growing in size. There are plenty of places outside Pt. Reyes to see pastoral grazing of cattle - - Pt. Reyes National Seashore's draw is the pristine natural environment - - not cattle viewing.

Pt Reyes National Seashore is supposed to be managed under the Point Reyes Act for "maximum protection, restoration, and preservation of the natural environment." Not for the benefit of commercial agricultural activity.

I support Option F - - No Ranching - Ranches should be phased out, and until then, ranchers should be charged market rate use fees - they should not be subsidized by taxpayers. - No new agricultural activities should be permitted that will further disturb the natural environment. - Wildlife should take priority over ranching - providing park visitors the opportunities to experience this unique ecosystem in its natural state. - Wildlife habitat that's been destroyed by ranching should be restored to its natural condition to support a broad spectrum of wildlife. - Historic buildings can be utilized as facilities for park staff, research, and public education.

#7271

Name: Israel, Paula

Correspondence: I am opposed to the proposed destruction of the Tule Elk herd at Point Reyes. This is public land, intended to be wild, and allowing ranchers to lease the land and dictate the killing of competing grazing animals like the elk is indefensible. Just as the park service kicked out the oyster farmers (despite evidence that they actually improved the water quality) due to an expired lease, the cattle ranchers have over-stayed. Cattle ranching is known to be quite destructive for the environment and an exceedingly expensive source of protein. Additionally, a national park should belong to the citizens and resident wildlife to enjoy, and not be a private money making concern for a few agricultural concerns.

#7272

Name: M, S

Correspondence: This is such a terrible tragedy and an idea that is always destructive. Destroying native and natural species for private interests is short sighted and should not be tolerated.

#7273

Name: Pelican , Susan

Correspondence: Keep our national seashore in its wilderness state. Thank you.

#7274

Name: Larson, Stephanie

Correspondence: September 23, 2019

Cicely A. Muldoon, Superintendent

Point Reyes National Seashore

One Bear Valley Road

Point Reyes Station, CA 94956

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

Dear Superintendent Muldoon,

The draft environmental impact statement (EIS) for a general management plan amendment (GMP Amendment) for Point Reyes National Seashore (Point Reyes) and the north district of Golden Gate National Recreation Area



(north district of Golden Gate) proposes Alternative B, as the preferred alternative in the General Management Plan for Point Reyes National Seashore. In reviewing Alternative B, it contains several inaccurate statements and noticeably lacks the scientific basis for the implementation of new practices to better manage the natural resources at Point Reyes. Several points in Alternative B are not based on peer-reviewed science, it presents an unbalanced approach that will not sustainably support diverse resources and values, including historical agriculture, ranching, and natural resources. Concerns are listed in the following comments.

#### Appendix H: Subzone Definitions and Selection Criteria

The extent of the range subzones was determined by using existing landscapes attributes and buffering them by 35 feet; zones created to protect resources that include threatened and endangered species or critical components of their life cycle (e.g., California red-legged frog, Myrtles silverspot butterfly, etc.). There is no basis for the creation of these zones, there is no cited scientific research to support their creation nor the selection criteria. The creation of subzones, Range Subzones and Resource Protection Subzone, have been arbitrarily assigned and are not based on any resource determination. In fact, the removal of grazing in these zones could actually detrimentally impact the natural resources that Appendix H is supposed to protect. Removal of grazing will impact native biodiversity, including the listed special-status species. These special-status species are likely to decrease with removal or decrease of managed grazing. Research and experience have shown that grazing is strongly linked to maintaining habitat for some special-status species on PRNS lands, while results have been not been conclusive for others. In all cases though, managed grazing has proven compatible with preservation of the special-status species found at PRNS (Table 1).

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

#### Common Name Scientific Name

Sonoma alopecurus *Alopecurus aequalis* var. *sonomensis*

Sonoma spineflower *Chorizanthe valida*

Tiburon paintbrush *Castilleja affinis* ssp. *Neglecta*

Marin dwarf flax *Hesperolinon congestum*

beach layia *Layia carnosa*

Tidestroms lupine *Lupinus*

Tidestroms lupine *Lupinus tidestromii*

California Native Plant Society rare

Point Reyes horkelia *Horkelia marinensis*

Point Reyes meadowfoam *Limnanthes douglasii* ssp. *Sulphurea*

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

Sonoma spineflower is found solely in a grazed pasture at PRNS. A masters thesis completed in 1992 on the ecology of Sonoma spineflower concluded that grazing of competitive, non-native plants had a positive influence on Sonoma spineflower survival (Davis 1992a and 1992b; USFWS 1998). Tiburon paintbrush and Marin dwarf flax occur on serpentine grasslands, with six occurrences of Marin dwarf flax on GGNRA grazing lands. PRNS staff concluded Marin dwarf flax may benefit from a moderate level of cattle grazing through the reduction of taller competing vegetation as the flax is subject to shading by competing grasses or may be suppressed by a buildup of thatch from previous years herbage if left ungrazed. (USNPS 2001). Beach layia and Tidestroms lupine are found in dune habitats. They do not appear to be dependent on grazing, though many of their occurrences are within grazed pastures (USNPS 2001). Point Reyes horkelia and Point Reyes meadowfoam are also found primarily within grazed areas (Bob Soost, 2004, personal communication).

UCCE highlighted the relationship of grazing to some threatened and endangered species in a report (Rilla and Bush, 2004). The report addressed Myrtles silverspot butterfly, which inhabits coastal dunes, prairie, and scrub.

Habitat suitability depends on numerous factors, but two critical components are the presence of its larval host plant, the native dog violet (*Viola adunca*), and adult nectar plants including numerous native wildflowers, as well as common weeds such as bull thistle (*Cirsium vulgare*) and Italian thistle (*Carduus pycnocephalus*). Most of the Myrtles silverspot butterflies documented at PRNS have been found in areas that are grazed either by cattle or tule elk. Butterfly surveys done by PRNS staff in 2003 showed occurrences of Myrtles silverspot on 13 ranches, all of which support livestock operations (Adams 2004). Recent research on Myrtles silverspot (Adams 2004; USNPS 2007) documents that Myrtles silverspot and cattle have co-existed for over a hundred years, and that the density of the nectar sources was higher in grazed areas. Biologists studying the Myrtles silverspot at PRNS recorded more butterflies in grazed dunes and grasslands than in ungrazed plant communities.

At PRNS, in managed grazing areas, numerous springs and ponds have been developed to capture runoff to water for livestock. The springs and ponds help to more evenly distribute the forage consumption by cattle across a pasture. The springs and ponds also provide drinking water for many wildlife species some of which, as discussed above, are rare species that coexist or are enhanced by grazing and the development and maintenance of ponds and springs. In riparian areas such as creeks, good range management may call for fencing to prevent heavy grazing of riparian vegetation, but exclusionary fencing may not always be the best solution.

Under Alternative B, there is no plan to exclude elk from resource protection subzones. At Yellowstone National Park, the lack of management of elk caused damaged to riparian areas. In order to manage the elk grazing, the Park introduced wolves into the ecosystem, resulting in the recovery of vegetation in riparian areas; photographs taken at a variety of locations showed considerable recovery of aspen in areas where it had become overgrazed in the years when elk were abundant (Ripple and Beschta, 2012, Ripple and Beschta, 2007). Although these riparian areas cover only a small area of the ecosystem (<2%), the park witnessed the first significant growth of aspen for over half a century. More recent data suggest that similar recoveries are being seen in cottonwoods and willows (Ripple and Beschta, 2012); this in turn has led to an increase in the abundance and diversity of riparian bird species (Hollenbeck and Ripple, 2008).

Rangelands have evolved from disturbances, such as grazing, and the removal of managed grazing by cattle can result in the loss of several threatened and endangered species. The removal of grazing in the 1980s and 1990s and into the early 2000s, was deemed detrimental to certain species (US Fish & Wildlife Service, (USFWS) 2002) and done in an effort to conserve threatened and endangered populations (special status species). Livestock grazing was reintroduced to protect the species that were supposed to be saved by removing grazing. Point Reyes is home to 20,000 acres of coastal grasslands made up of native and non-native species. The creation of these subzones will not protect the special status species that Appendix H claims to protect.

In addition, the reduction of cattle grazing lands through the resource protection subzone will result in increased brush lands at PRNS, with coyote brush likely becoming more abundant species. Coyote brush, *Baccharis pilularis* DC., although a native species, can over take areas resulting in the loss of other native species. It can be a problem in range or pastures (Robbins et al., 1970) and will displace other desirable vegetation if not properly managed. This occurs through managed grazing, not grazing from unmanaged wildlife.

Coyote brush's successional status varies with habitat type (Williams and Hobbs, 1989). It invades and colonizes grassland replacing annual grasses (da Silva and Bartolome, 1984; Steinberg, 2002). This is correlated with the absence of managed grazing and the rate of invasion increases with precipitation, because wet springs maximize early root growth. Range management practices are known to be effective for improving forage quality and quantity; management using tools including fire, mowing, grazing and planting rangeland forages have resulted in preserving the lush, productive, and biodiverse grasslands. 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. In these subzones, PRNS proposes to remove even more grazing from currently managed grazing lands.

As climate change continues to affect California, creating drier conditions and prolonging the fire season, employing the best land and natural resource management practices for reducing invasive species and fire fuel loads will be critical to decreasing the risk and impacts of wildfires at Point Reyes and the surrounding communities. 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 soil absorption and less plant nutrient uptake. At Point Reyes, coyote brush encroachment is overtaking natural resource areas and will lead to reduction of special status species.

Alternative B does not consider the importance of managed grazing by cattle in the newly created subzones; it conversely seeks to reduce the amount of areas that are currently grazed. Regenerative ranching, which promotes biological diversity in these lands, can provide a balanced habitat. Just as a system needs a diverse group of grasses, a diverse group of trees and shrubs can contribute to the diversity in soil microbes possibly raising our levels of carbon sequestration. Within PRNS, coyote brush has invaded much of the grassland area, and should be an important management goal for Point Reyes. Using managed grazing, with ranchers, will achieve this goal. Ungrazed areas over time can result in a buildup of dead grass on the other side of the fence where grazing is excluded, and a thick mass of dead grass forms that prevents native plants from germinating and growing. The mass of dead grass can be overcome by invasive species such as coyote brush and Himalayan blackberry. The buildup of dead grass results in a less than healthy system, which could lead to increased erosion, reduced nutrient and water cycling and increased fire hazards. On managed grazing lands, ranchers have implemented practices that are beneficial to water quality, soil health and biodiversity. Ranchers have spent their own money to maintain and improve rangeland and watershed conditions in cooperation with the U.C. Extension Service, U.S.D.A. Natural Resource Conservation Service, and the National Park Service.

## Elk Management

In 1978, PRNS reintroduced tule elk (*Cervus canadensis nannodes*), the only National Park unit where tule elk can be found. The State of California provided the initial elk re-introduced to Tomales Point; state wildlife biologists were integral members of the team that managed the re-introduction and subsequent monitoring. The plan stated that forage is unaffected by the number of elk occupying the range and elk do not have a strictly negative effect on vegetation. However, in 1999, PRNS moved a free-range herd of 28 elk from Tomales Point to the wilderness area near Limantour Beach. Within weeks, a few elk unexpectedly migrated to ranches in the designated pastoral zone.

Point Reyes National Seashore has attempted to manage elk habitat and their movements in the pastoral zone, but only by hazing. PRNS conducts elk hazing on a daily basis, but the elk have habituated to certain locations and return after the hazer leaves. This is not a natural way to manage elk, which are in the pastoral zone because they prefer the grass as opposed to brush encroached habitat of the Wilderness areas. Efforts to encourage better elk distribution in their designated areas would not only benefit them, but also the livestock and dairy producers along with sensitive natural resources areas at PRNS. Herds at Limantour and Drakes Beach are much less natural, inasmuch as they are being artificially supported by the ranchers fertilized fields and managed water supplies (Fimrite, 2015). As biologist Dale McCullough stated, there is nothing to stop the expansion of these southern herds except human interface&If ranchers are improving the range that will be even more attractive to the elk than the natural vegetation, especially during the dry season (Watt, 2015).

Elk migration and feeding behaviors have been studied extensively in Idaho (Dalke et al., 1965; Unsworth et al., 1998), Washington (Schwartz and Mitchell, 1945; McCorquodale, 1993), Montana (Edge et al., 1987), Yellowstone National Park (Boyce et al., 2003; Mao et al., 2005), and Rocky Mountain National Park (Green and Bear, 1990). Elk feeding behavior is largely influenced by forage quality. Low quality forage reduces daily feeding time and high-quality increases feeding time (Green and Bear, 1990). PRNS experiences different seasonal variations in forage quality due to a rainy winter and spring seasons and drier summer season, producing higher quality forages during spring, potentially inverting the expected feeding behavior in elk. The winter period also accounts for the time dairymen pasture their cows to meet the 120-day, 30% dry matter intake requirement from pasture for organic certification (Rinehart and Baier, 2011). Increased elk grazing during the same period that cattle are expected to graze presents management concerns for forage competition. Elk and beef cattle summer diets overlapped by 42% in Colorado (Hansen and Reid, 1975) and 46% in Nevada (Beck and Peek, 2005). They have also been reported as socially compatible (Wallace and Krausman, 1987), potentially influencing the amount of time elk spend grazing cattle pasture. Elk habitat selection was primarily driven by cattle use, distance from the nearest visible road, forage biomass, and distance to cover (Grover and Thompson, 1986). Cattle use and the greater available biomass on cattle pasture likely increase use of the pastoral zone.

Road usage and tourism should decrease elk pastoral zone use; however, as PRNS is a public destination, familiarization with park guests and ranch activity may reduce the behavioral necessity for elk to avoid trafficked areas. Increased habituation may result from food conditioning, natural tolerance, predator refuge, and habitat occupancy by humans (Found and St. Clair, 2016). Habituation of wildlife to people, while a benefit for wildlife viewing in tourist trafficked areas, can lead to ecosystem damage, result in human-wildlife conflict (Walter et al.,

2010), and increased elk habitation on ranching lands. Alternative B recommends increased public access on permitted, grazing lands. While ranchers are open to educating the public about their operations and agriculture in Marin County, this will be yet another challenge to their already limited ability to maintain a viable agriculture operation.

Increased use of ranching lands may also be encouraged by preference of elk to graze and rest on open meadow compared with forest (Collins and Urness, 1983), improvements to forage quality on lands grazed by cattle (Anderson and Scherzinger, 1975; Grover and Thompson, 1986), and the increased forage management on intensively managed cattle pasture. Typically, the negative impacts of elk cohabitation with cattle are offset through revenue generation with hunting (which is proposed in Alternative B but only at 10%). Elimination of potential benefits of co-grazing for ranchers creates a need to improve elk habitat outside of the pastoral zone. Unmanaged grazing, results of a free-ranging elk herd has shown to result in over grazed and under grazed areas. Alternative B has not taken into account the value of ranchers management, and instead has reduced the grazing land that ranchers managed. This is a similar management strategy, and as with the wild horse management strategy, excessive populations have depleted scarce food and water resources on rangelands, leading to starvation and dehydration of the horses and burros. A similar situation occurred at PRNS; one that will occur again with the elk management plan outlined in Alternative B.

In 1998, Point Reyes National Seashore adopted their Elk Management Plan; in that plan the Park states there will be careful monitoring of both elk and threatened and endangered species is important to ensure that the Seashore's management of elk is not harming T&E species. There has been no monitoring of the elk's impact to these species as they expand past their 1998 borders. In the Rocky Mountain National Park elk management plan, it pays special attention to the importance of monitoring elk grazing to ensure they don't adversely affect special status species. In the PRNS Alternative B, there is no management plan to ensure the protection of special status species. The lack of management will result in negative impacts to special status species that the PRNS has stated they want to protect. Elk should be removed from the pastoral zone where these special status species exist currently because:

" The elk can damage the ecosystem because they are not managed grazers;

" They have grazing areas at Limantour and Tomales Point;

" Current grazing by ranchers in the pastoral zone should remain, as their management has resulted in desired species habitat.

## Economics of Animal Agriculture

Point Reyes National Seashore (PRNS) lands provide a direct link between urban consumers and local food producers, a powerful conduit for educating the public about the importance of local food production and security. Marin County continually demonstrates how preserving family farms can contribute to social, economic and ecological sustainability at local, regional and even national levels. Ranching and farming have positive health impacts including increased food access and food security, food to local business and schools, improved health literacy and general well-being. Ranching in Marin County, which includes PRNS, remains a local industry which provides job creation, training and business succession, and market expansion for many other ranchers and farmers.

Dairy cattle at PRNS are organically raised. Organic food markets have shown considerable economic value within the US, accounting for an estimated \$28.4 billion in 2012 (Greene, 2017). While produce accounted for 43% of the organic food market value, dairy products ranked second, consisting of 15% of the total (Greene, 2017). Increased demand for organic fluid milk caused organic milk volume sales to increase from 1.9% in 2006 to 4.4% in 2013 of total fluid milk volume sales (USDA-ERS, 2014) and supported the growth of organic dairy farms throughout the US (1.7 vs. 7.4% of total dairy operations from 2007 to 2013, respectively; USDA, 2007, 2016). This growth has been particularly pronounced in small and medium sized herds with fewer than 500 cows (USDA, 2007, 2016). While organic producers typically earn more money per hundredweight of milk, the cost of sourcing organic feeds and resources meant a cost of \$7.65 per hundredweight higher than conventional farms, or nearly \$1 more than the average price premium for organic milk (McBride and Greene, 2009). This higher cost may influence producers to use grazing more, as pasture for feed costs less than other high-energy sources (McBride and Greene, 2009).

While much of the wildlife is not likely negatively affected the management of organic dairy production, co-existence with large herbivores, such as elk, does represent a challenge, as there is likely competition for forages

on grazing lands. In Colorado during summer months, elk and beef cattle diets overlapped by 42% (Hansen and Reid, 1975). Beef cattle and elk have been reported as socially compatible (Wallace and Krausman, 1987), potentially influencing the amount of time elk spend grazing cattle pasture. This may also be encouraged by improvements to forage quality on lands grazed by cattle (Anderson and Scherzinger, 1975).

Alternative B recommends 20-year lease terms for existing ranch families to continue their beef and dairy operations. These long term leases are needed to allow ranchers to make economic and ecological investments on the land. However, given that lease will now need to include elk grazing, and with increased elk pressure, the number of animals that can be grazed on individual leases will decrease. Ranchers will not be able to remain in business if their grazing allotments are reduced below a viable threshold since allotments will be shared with elk. The amount of land grazed by managed grazing animals will be arbitrarily reduced. This will greatly impact permitted beef and dairy producers livelihoods.

Alternative B provides for diversification activities would be authorized in specific subzones in a manner consistent with the EIS. The specific subzones were not determined based on soil type, locations, or other landscape attributes. The diversification area is limited to 2.5 acres, an amount not based on any economic analysis. These same acreage is not an economic viable scale for ranchers to get a return on their diversification investment.

#### Appendix I: RDM Model

Residual dry matter (RDM) is the herbaceous plant material -living or dead- left standing or on the ground at the end of the grazing season, typically considered the beginning of October, or the start of the new water year, (Bartolome et al., 2006). RDM measurement is commonly used to assess the years grazing use on annual rangeland, whether moderate, excessive or light. The recommended standards are based on the observation that the amount of RDM remaining in the fall interacts with site conditions and weather to influence rangeland vegetation species composition and forage production in the coming year. RDM standards are guidelines and it is recommended that local guides be developed for the very reason that production varies on the same mapping unit and ecological site due to differences in weather, soil type and growing season length at a given location. Because production is so closely linked to prevailing weather, other locations in the same ecological site can vary greatly in production.

In Appendix I, a model that simulates rangeland forage production and consumption by cattle (and if desired, by elk), predicts the residual dry matter on a specified rangelands at the end of the grazing season. Residual dry matter is based upon a percentage of total annual above ground production at the end of the grazing season. This prediction tool claims to provide a rapid estimation tool for managers, assessing the ability of a land parcel to support variation in stocking rates, forage decomposition, etc.; however, this tool is flawed. It cannot predict the elk population and residence times and their grazing amount since elk are not a managed species. Appendix I indicates the model is a supplementary tool to combine with on the ground range management, rancher expertise and other relevant data/observations. This model cannot predict long term simulation of average RDM by a free ranging animals, unmanaged elk. It is not consistent with using the rangeland manager and the ranchers experience.

The model is not based on scientific literature; and because of the limited amount of site-specific research information, RDM standards normally must be developed using local experience and general guidelines, particularly on perennial pastures. This has been used efficiently by the Point Reyes ranchers knowledge of the lands carrying capacity, annual precipitation along with the implementation of good grazing management practices. Park staff and ranchers have worked together for several years to better understand and managed RDM for the long term benefit of grazing lands at Point Reyes. The creation of this model serves no purpose other than to justify the need to reduce the amount of managed grazing animals carried by ranchers. Finally, listed researchers on Appendix I, provided input and advice to NPS staff during the development of Appendix I. They did not provide peer review for either Appendix H or I; to state otherwise is inaccurate and misleading. The preferred alternative, Alternative B, does not provide a balance to ensure the protection of the Parks natural resources while maintaining the historical, sustainable ranching that has occurred at PRNS for over 200 years. Beef and dairy producers implement best management practices including brush control, invasive species removal, and special status species management, while increasing water quantity and quality and the sequestering of atmospheric carbon in rangelands soils. A solution that specifically addresses elk management, completely excluding them out of the pastoral zone, will guarantee the continued existence of the unique natural resources and history at Point Reyes National Seashore.

Sincerely,

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

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#7275

Name: Skaug, Joy

Correspondence: I am writing to urge the National Park Service to discontinue the grazing of beef and dairy cattle at Point Reyes National Seashore. This precious area has been damaged by livestock grazing which poses a threat to the environment and local wildlife and it should be protected and used to serve the public good, and not for the benefit of the livestock industry.

I strongly oppose Option B and any other proposal that would be fatal to Tule Elk or other wildlife to the benefit of ranching operations, and encourage the agency to adopt Option F to discontinue grazing and allow members of the public to enjoy this beautiful park and to be enriched with opportunities to visit and appreciate this special place.

#7276

Name: Lango, John

Correspondence: A main reason why I visit the Point Reyes National Seashore is to view the wildlife. Our national parks have the mission of protecting native plants and animals. According to the recent Environmental Impact Statement, the land, water, and wildlife of the Point Reyes National Seashore are being harmed by the cattle owned by the ranches that are allowed to use land there. Therefore, ranching operations should be promptly and expeditiously discontinued. There is an abundance of ranch land outside the Point Reyes National Seashore where these ranches could relocate their cattle. There should not be a Historic Ranch Preservation subzone. Glorifying the genocidal practices of ranches is akin to glorifying Confederate generals by honorific statues.

#7277

Name: Brown, Preston

Correspondence: 23 September 2019

Re: Comments for DEIS on GMP Amendment for Point Reyes National Seashore and GGNRA Planning Area

The Turtle Island Restoration Network is a national conservation organization with over 160,000 supporters and members throughout the US with a high concentration of supporters in the Bay Area.

We submit these comments on the Environmental Impact Statement (EIS) for the General Management Plan (GMP) amendment for lease lands at Point Reyes National Seashore (PRNS) and the north district of the Golden Gate National Recreation Area (GGNRA).

We believe the reintroduction of Tule Elk to the Point Reyes peninsula has so far been a success story for the conservation of native species and restoring ecosystems, in keeping with the mission of the National Park Service.

Resource protection is the highest value for the Seashore as intended by Congress in requiring the Department of the Interior to administer its Point Reyes lands "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 USC Sec. 459c (6)(a).

Turtle Island Restoration Network believes that the priority for the GMP should be to improve native wildlife preservation, ecosystem health and function, and ecological integrity.

For this reason, we oppose the NPS preferred alternative B that would allow native Tule Elk to be killed in favor of cattle grazing. Instead, we support alternative E with the following suggested modifications:



Suggestion editions to Alternative E

- The DEIS should provide more detail on managing invasive vegetation that is consistent with promoting native wildlife biodiversity and ecological processes.
- Areas of heavy cattle traffic in sensitive areas, along streams and adjacent to water bodies should be fenced and revegetated with native plants
- Cattle should be managed to mimic natural herbivores with rapid rotational grazing in order to disperse cattle out across the landscape and prevent the confinement of trails, especially in sensitive areas.
- Locations of needed habitat restoration should be identified where impacts from cattle grazing and dairy ranching have resulted in degraded environments, especially along streams and water bodies where impacts from erosion, nutrients, and manure have impacted adjacent habitats.

Turtle Island Restoration Network believes that the Draft Environmental Impact Statement (DEIS) overlooks areas of important consideration necessary for determining impacts from the proposed management alternatives. These are discussed below.

- 1) DEIS does not evaluate cumulative, direct or indirect impacts, connected actions, or reasonably foreseeable outcomes of agricultural diversification. Such impacts overlooked are conflicts between native wildlife predators and chickens, goats, pigs, and sheep. Other impacts of diversification not analyzed in the DEIS are impacts to visitor experiences and development of new trails and visitor uses by the introduction of diversification and impacts to the scenic and historic values of the Seashore.
- 2) The DEIS needs to consider future impacts from climate change. To protect park resources from impacts of climate change, protections should be identified and prioritized over ranching activities. Additional maps for the public should be developed that identify current restoration projects and sensitive water resources that are outside the Planning Area but are impacted by development within the Planning Area. Previous Seashore planning documents have analyzed climate change as a cumulative impact, this DEIS does not consider climate change impacts at all.
- 3) The DEIS also excludes analysis of federally listed wildlife that utilize the unique habitat of Drakes Estero stating, "Listed marine mammals (e.g. whales, seals, sea lions, sea turtles, and abalones) may use beaches adjacent to the planning area but are not included in this analysis because ranch activities would not affect these species in the planning area...elephant seals are found immediately adjacent to ranch lands...however, ranch operations do not affect them."
- 4) Finally, this analysis fails to consider the cumulative and connected impacts of ranching activities that includes trampling, erosion, and nutrient deposits from storage and distribution of manure that flows into the creeks that drain to beaches, wetlands, and wilderness areas that are not in the planning area but are adjacent and connected by ecological functions or species movement to new areas.

We appreciate the opportunity to provide comment on the GMP DEIS. Our intention is to request the DEIS evaluate impacts to the GMP that have so far been overlooked and investigate the scientific impacts of grazing and dairy operations in their entirety on the native wildlife and ecosystems functions of the landscape within PRSN and GGNRA.

Sincerely,

Todd Steiner and Preston Brown

Turtle Island Restoration Network  
Salmon Protection and Watershed Network

PO Box 370 Forest Knolls, CA. 94933  
415-663-9590

#7278

Name: Falcone, Stephanie

Correspondence: We live in San Rafael, CA and Rep. Huffman is our representative.

The plan to shoot Tule Elk at Point Reyes is ill-conceived and just plain wrong.

As you can imagine, living less than 20 miles from Pt. Reyes, our family are frequent visitors to the area. One of the reasons we go to this spectacular place is to see the Tule Elk.

We don't go to see the cows (and even if we did, as a rule, cow ranches do not welcome visitors).

A second point I would like to make is that the presence of the cows there is ALREADY having very detrimental effect on the environment, as every year, hundreds of millions of pounds of cow dung is deposited into the Pacific Ocean.

(Earning Pt. Reyes National Seashore the lovely nickname of the "crappiest" beach in the U.S.)

I understand that approximately 100 years ago, the farmers were promised they could stay.

No one is kicking them out.

If they are having a hard time making a living from farming cows in that location because the NATIVE Tule Elk (whose numbers are an infinitesimal fraction of what they were 100 years ago) eat the same forage as the the cows, that is not the responsibility of the Park Service.

The Park Service said they could stay. The Park Service did NOT say "We will do whatever we need to do, up to and including killing native species, to make sure that your farms are economically viable."

As you might also imagine, we spend a good bit of money in Pt. Reyes and surrounding West Marin.

If you go ahead with this elk killing plan, Pt. Reyes will forever tainted for us and thousands of other nature lovers (the exact kind of people that Pt. Reyes attracts).

Economically, this is not a good idea.

In terms of public relations, it is a disaster and in terms of the elk who live there (and were there first), it's cruel and unnecessary.

You will please some farmers who farm cows in the Pt. Reyes area.

You will strongly upset the many environmentalists, animal advocates and families who love to see the Tule Elk- and all of that is just local.

Pt. Reyes is, obviously, a worldwide attraction.

Killing the elk will not endear potential visitors from anywhere and by killing Tule Elks, you would be reducing one of the natural attractions that draws tourists to Pt. Reyes in the first place.

In summary, this plan is cruel, very bad ecologically and likely to result in Pt. Reyes generating diminished economic returns.

Please, do not shoot the Tule Elk.

Thank you for your consideration.

Sincerely,

William and Stephanie Falcone

#7279

Name: Umbarger, Michael

Correspondence: I'm writing to support the public access and bicycling improvements outlined under Alternatives B, C, D, E, and F. I strongly support proposals that would lead to the planning and implementation of bicycling routes on trails, ranch roads, and pathways throughout the planning area, including but not limited to: 1) a connection between Devil's Gulch and Platform Bridge Road using existing ranch roads, 2) a connection between Bolinas Ridge Trail at Olema Hill and Point Reyes Station to serve as an interim connection for the Cross Marin Trail, 3) a connection between Bolinas Ridge Trail and Five Brooks Stables using existing ranch roads 4) a connection between Drakes Estero and Abbotts Lagoon Trail using existing ranch roads, 5) a connection between Marshall Beach Trailhead and Pierce Point Road using existing ranch roads, and 6) an Estero Trail loop using existing ranch roads. I encourage NPS to collaborate with ranchers and other stakeholders to educate the public and address concerns related to public access on working ranch lands.

The improvements outlined above would enable and encourage me to visit the Seashore more regularly-and by bike, rather than car. I would feel much safer riding in the Seashore and surrounding areas on trails, pathways, and ranch roads, rather than on roads shared with fast-moving vehicular traffic. Bicycling opportunities are currently very limited and fragmented, so any improvements in connectivity and the creation of new loop options would enable me to enjoy more of the Seashore and surrounding areas by bike.

#7280

Name: Brookover, Cicely

Correspondence: I am so concerned about the potential for increased grazing of cattle and the culling of Tule Elk in Point Reyes.

I understand that Point Reyes Seashore is the only national park where these rare native elk exist. Cows outnumber elk 10 to 1. The NPS plan the elk calls for culling 10-15 elk annually to maintain a population 120. Any free-roaming elk that forage on land leased for cattle will be shot.

This is SO WRONG. Ranchers SOLD this land to the park many years ago. Please don't let cows and greed overcome the need for native wild animals.

Thank you

Cicely Brookover

#7281

Name: Cassidy, Margaret

Correspondence: Cattle Farming is destructive to the environment for many reasons, including carbon emissions, desertification, and habitat loss for wild species. It is short sighted and economically foolhardy to propose killing wild elk and replacing them with cattle. Tourists are not uninformed, and they understand the need for us to protect and preserve wildlife in our parks. Please do not mislead the public into thinking it is environmentally advantageous to have an unnatural domesticated animal farm instead of allowing the animals to be. It could not be more clear that cattle ranching interests are influencing government policy simply due to their economic clout. This is the wrong way to bring money into our park system.

#7282

Name: Shaman, Cory

Correspondence: You ask that my comment be substantive, and so I base my comment on one criterion you identify: that it questions with reasonable basis the assumptions used for the environmental analysis.

And so, any assumption that animal agriculture is a sustainable practice is patently absurd. I refer you to the IPCC reports on climate change and associated international documents that directly challenge such a position on a mountain of evidence. Dairy and beef operations should receive absolutely no public money as those operations are destructive of animals, the environment, and people.

The grossly unexamined assumption that animals do not deserve moral consideration - - by treating them as mere fungible objects in the economy of current, normative agricultural practices and environmental management practices - - is an affront to all reason. We should learn to live with animals in nonviolence, and we are perfectly capable of doing so in ways that do not diminish our ability to thrive. In fact, living with animals in caring relationships creates more beneficial human social arrangements.

Environmental policies and projects should not and must not be used as instruments to unnecessarily (and I use that term very carefully in a specific framework that I am willing to describe further) harm and kill animals. Dairy results in the extreme suffering of cows and their killing, ranching results in many forms of violence and killing of cattle, and killing Tule elk is a wrong with no reasonable basis.

I vehemently object to any policies that perpetuate violence against and killing of animals.

Thank you.

#7283

Name: N/A, N/A

Correspondence: It is time to move away from animal agriculture. The industry destroys ecosystems, wildlife and the farmed animals it exploits. Say no to animal agribusinesses' on public lands.

#7284

Name: Monroe, Jim

Correspondence: Honestly, I took this long to comment because the whole affair is so disappointing. The answers are clearly for the farms to leave at some point and be reduced now. It just is so wrong to let lawyers strategize about the "cultural" history of the park and run with that euphemistic, irrelevant word as the main concern here. It just isn't. I'm sincerely embarrassed that this is happening in our state and it's another example of why politicians are so shameful and disrespected.

Move the farms out of public land. The labor pool and economy it hits is negligible. Especially, only in defense of a dying, elastic industry that brings no true value to the area.

#7285

Name: N/A, N/A

Correspondence: The public lands and native wildlife on Point Reyes National Seashore and Golden Gate National Recreation Area need to be conserved - not replaced with cattle and commercial agricultural expansion. This decision can lead in the right direction or bring shame. Please conserve the nature we all rely on and produce less of the food that the population is shifting away from.

#7286

Name: Deutsch, Barbara

Correspondence: I am an advocate of restoring Point Reyes as a wilderness, in keeping with the National Parks original mission and also the original agreement in which the ranchers were compensated for their land by the U.S. government. I disagree with my tax dollars being spent to support private businesses that have already been paid for their property and now receive drastically below-market leases and publicly supported maintenance services.

But my greatest concern is the degradation of the water, land and wildlife habitat of the Seashore. I visit many times a year to hike and enjoy the magnificent natural environment. I always arrive so my visit coincides with sunset when the elk begin stirring and moving across the landscape. It is one of life's greatest pleasures. And now, I understand that these creatures will be allowed to be killed because they interfere with dairy ranching! How arrogant are we humans that we first decide to reintroduce the Tule elk the Seashore to save them from extinction, then decide to kill them off when it becomes inconvenient for our businesses.

Please, please play a leadership role for our country by turning around the terrible direction being taken by the U.S. Park Service in Utah, Alaska and California.

Stand up for the unique wildlife and habitat you were hired to protect, not for ranchers who can raise cattle anywhere.

Thank you.

#7287

Name: Teicheira, Dana

Correspondence: I'm writing to support the public access and bicycling improvements outlined under Alternatives B, C, D, E, and F. I strongly support proposals that would lead to the planning and implementation of bicycling routes on trails, ranch roads, and pathways throughout the planning area, including but not limited to: 1) a connection between Devil's Gulch and Platform Bridge Road using existing ranch roads, 2) a connection between Bolinas Ridge Trail at Olema Hill and Point Reyes Station to serve as an interim connection for the Cross Marin Trail, 3) a connection between Bolinas Ridge Trail and Five Brooks Stables using existing ranch roads 4) a connection between Drakes Estero and Abbotts Lagoon Trail using existing ranch roads, 5) a connection between Marshall Beach Trailhead and Pierce Point Road using existing ranch roads, and 6) an Estero Trail loop using existing ranch roads. I encourage NPS to collaborate with ranchers and other stakeholders to educate the public and address concerns related to public access on working ranch lands.

The improvements outlined above would enable and encourage me to visit the Seashore more regularly-and by bike, rather than car. I would feel much safer riding in the Seashore and surrounding areas on trails, pathways, and ranch roads, rather than on roads shared with fast-moving vehicular traffic. Bicycling opportunities are currently very limited and fragmented, so any improvements in connectivity and the creation of new loop options would enable me to enjoy more of the Seashore and surrounding areas by bike.

#7288

Name: Yu, Tammy

Correspondence: Please, no more cattle grazing in Point Reyes! I'm a frequent visitor to the Point Reyes National Seashore, and I find the numerous dairies and cattle ranching operations to be a blight on the landscape and a producer of noticeably fetid air. Please protect the native Tule Elk - they belong, whereas the climate destroying meat and dairy factory farm operations do not. I don't believe the regenerative grazing false narrative promulgated by ranching crowd - you don't regenerate the environment by getting rid of natives and replacing with destructive non natives!

#7289

Name: Buttermore, Emily

Correspondence: I have been a visitor at the Point Reyes Seashore. I am dismayed to hear the plans of culling a wild Elk herd in favor for more Ranching. The cows are polluting the water and overgrazing, trampling native wildlife.. We should protect what we have left.. I thought The mission of national parks is to protect native plants and animals. Please be assured there are plenty of cattle in other areas.. I feel the plan to cut out ranching and increase Elk Range to be the best.. And if so ever the population becomes too large, they may look into transporting to the Tribal Lands who have expressed desire to see the herd live and further flourish..

#7290

Name: Lehman, Benjamin

Correspondence: The elk at Point Reyes are some of the most lovely fauna in the bay area. Keep their numbers strong.

#7291

Name: Petaluma, Robert

Correspondence: Please do not disclose or publicize my identity.

I'm writing to support the public access and bicycling improvements outlined under Alternatives B, C, D, E, and F. I strongly support proposals that would lead to the planning and implementation of bicycling routes on trails, ranch roads, and pathways throughout the planning area, including but not limited to: 1) a connection between Devil's Gulch and Platform Bridge Road using existing ranch roads, 2) a connection between Bolinas Ridge Trail at Olema Hill and Point Reyes Station to serve as an interim connection for the Cross Marin Trail, 3) a connection between Bolinas Ridge Trail and Five Brooks Stables using existing ranch roads 4) a connection between Drakes Estero and Abbotts Lagoon Trail using existing ranch roads, 5) a connection between Marshall Beach Trailhead and Pierce Point Road using existing ranch roads, and 6) an Estero Trail loop using existing ranch roads. I encourage NPS to collaborate with ranchers and other stakeholders to educate the public and address concerns related to public access on working ranch lands.

The improvements outlined above would enable and encourage me to visit the Seashore more regularly-and by bike, rather than car. I would feel much safer riding in the Seashore and surrounding areas on trails, pathways, and ranch roads, rather than on roads shared with fast-moving vehicular traffic. Bicycling opportunities are currently very limited and fragmented, so any improvements in connectivity and the creation of new loop options would enable me to enjoy more of the Seashore and surrounding areas by bike.

#7292

Name: Meyer, Lisa

Correspondence: Please do NOT allow local elk to be shot to make room for cows. Let these elk be. Cattle ranching is contributing massively to the destruction of natural habitats around the world.

It is beautiful to see elk in Pt. Reyes in their natural environment. Livestock does NOT belong on public land. Protect natural resources.

#7293

Name: Haworth, Elia

Correspondence: We want visitors to come to coastal Marin and cherish open land and small towns, but not at the price of our communities, historic ranches, food production and the people who have invested their lives in this region.

I am haunted by comments at a crowded meeting about the impact of tourism that was held at the Dance Palace. John Dell'Osso, of Point Reyes National Seashore, reported on the TONS and TONS of visitor's trash and human waste that the park service has to haul out from campsites, trails and visitor areas. Why is that not the major issue of our discussions?

(That meeting was attended by our senator and supervisor, leaders of the sheriff's department, CHP, Coastal Commission, Point Reyes National Seashore and the head of Caltrans for the Bay Area were on the panel listening to public comment. People spoke of the shared frustrations with overwhelming traffic, crowding, and the emphasis on expanding tourism instead preserving our unique communities and landscape.)

Point Reyes has been grazed by cattle since the Spanish colonists gained Mexican land grants. And there was once more than 800 acres of peas and artichokes growing by Drake's Bay.

Now there are ranching families that have been on the land more than one hundred years, and remain passionate about food production. History of place IS important! The ranches are a living part of our shared history, they should be protected and celebrated.

The ranches are also hope for our future. Global warming will impact American agriculture, but here in the cool clean landscape, food production will remain viable, with small scale production of high quality and mostly organic food, by ranchers who are evolving their sustainable practices.

Regarding our handsome elk: no specie should reproduce unchecked, but we have removed the natural predators of elk. Since we manage their lives, it is also our responsibility to limit the size of herds and not let them intrude on ranches or private property. There is a lot of space for co-existence.

#7294

Name: Stewart, Gordon

Correspondence: I strongly support the idea of opening the trails in the Pt Reyes area to bicycles.

This is a multi-use area and bicycle access in the Park should be opened on roads and trails that are vehicle accessible. Single-track trails preferred by hikers should be reserved for hikers (an possibly for equestrians ??).

Pt Reyes National Seashore is a wonderful resource that I have enjoyed many times as a cyclist. The opportunity to get off the paved roads and enjoy some of the farm roads would be a welcome gift.

#7295

Name: Hemphill, Rhonda

Correspondence: There are several reasons that they should not kill these elk. I am not opposed to hunting so It isn't for those reasons that I object to killing these elk. For one reason there is very little room for these elk and to have a niche for them seems well worth saving. It is also a draw to people to get a chance to see them, they are not that predominant in the wild. We shrink the habitat of all our wildlife until they have nothing left. Why do we kill animals off only to wait till they are almost gone to try to save them. This is a small herd, they should not be sacrificed to appease cattlemen. The amount of feed, that the 4 that they propose to kill, eat is hardly work killing for. Cattle are on every piece of ground available and it seems only right to allow some other creature the right to some of that ground. Politics get involved and the cattlemen always seem to win, it's time that the little guy gets to win.

Some one needs to fight for the rights of someone other than the cattlemen, they seem to control what we do with public lands.

It is public lands, people need to see and enjoy these magnificent animals.... we as Americans owe it to ourselves and the generations that come after us to preserve them and allow them to continue to thrive there.

We should want to preserve them and we should be proud that we stood up for them.

#7296

Name: muzik, crystal

Correspondence: Please do not kill the elk. Please at least take them somewhere else. There is no need for more cows

#7297

Name: Klamner , Tamara

Correspondence: Our public lands and native wildlife on Point Reyes National Seashore and Golden Gate National Recreation Area need to be conserved - not replaced with cattle and commercial agricultural expansion.

#7298

Name: Niman, Nicolette

Correspondence: TO: National Park Service

From: Nicolette Hahn Niman and Bill Niman

Re: Point Reyes National Seashore Draft Environmental Impact Statement for the General Management Plan Amendment

September 23, 2019

## Introduction

A grossly over-simplified narrative runs through much of the environmental advocacy surrounding the Point Reyes Seashore National Park (Seashore), and specifically the management plan currently under consideration. It goes something like this: A unique, vibrant ecology is threatened by farming and ranching and can be restored only by agriculture's removal. This idea, which has permeated much of the litigation and activism about the Seashore for years, is not only false it is dangerous. If accepted, it would lead to a far less beautiful, less ecologically vibrant park and region.

Much has been said and written by others about the history of the Seashore, so we will not restate it here. Simply put, agriculture has existed since long before the creation of this park and was always meant to continue as part of it. Largely because of the farms and ranches, as well as its geographic location, the Seashore is especially positioned to connect people not just with nature but also with working landscapes, farming, and their food. In fact, the Seashore may be the only park in the United States that makes up such an essential piece of a functioning and cherished local foodshed. No other park has both plentiful agriculture and a close proximity to a major metropolitan area world famous for farm to table cuisine. Just in this small geographic area, at least four nationally known brands of high quality foods - Niman Ranch, Straus Dairy, Marin Sun Farms, and Point Reyes Farmstead Cheese - all had their origins and continue to operate. These facts alone make a strong case for keeping agriculture as part of the Seashore. But there is a lot more to consider.

## Who We Are

We are a husband and wife ranching team who, together with our two sons, raise grassfed cattle and heritage breed turkeys on a ranch in the Seashore. We sell our meat locally throughout the Bay Area, and advocate nationally and internationally for regenerative farming practices, especially for well-managed grazing, and for the importance of animal-derived foods in the human diet. Bill is the founder of the sustainable meat company Niman Ranch, and co-founder of BN Ranch, a grassfed meat company. He is co-author of *The Niman Ranch Cookbook*. Nicolette worked previously as the Senior Attorney for the environmental organization Waterkeeper Alliance, where she led the group's campaign to reform the livestock industry. She is co-founder of BN Ranch and author of two books about sustainable meat production, *Righteous Porkchop: Finding a Life and Good Food Beyond Factory Farms*, and *Defending Beef: The Case for Sustainable Meat Production*, as well as numerous articles and op-eds about ecological food production in *The New York Times*, *The Wall Street Journal*, *The Atlantic*, *The Los*



Angeles Times, The Earth Island Journal, and many other publications.

### Regenerative Agriculture is the Future

Much of the criticism launched at the National Park Service for allowing ranching to continue in the Seashore has suggested that agriculture, especially of animals, is inherently destructive and extractive, often also suggesting that we all know we should be eating less dairy and meat. Implicitly these people argue that the world, in general, as well as the Seashore, specifically, would be a better place if there were fewer people raising livestock. We vigorously refute every aspect of these claims. They vastly oversimplify complex questions of diet, health, and the environment and ignore the vital role local farm people play in communities. In truth, farmers and ranchers can and must be essential allies in the burgeoning movement to re-make our food system into one that produces healthy, nutrient rich food and is ecologically regenerative. And while there are people whose health might benefit from reducing their meat consumption there are others whose health would improve if they ate more meat.

These critics dismiss regenerative agriculture as impractical, unfeasible, or even impossible. Animal rights activists, and conventional agriculture and its allies - fossil fuel and chemical companies, big food companies, and the pharmaceutical industry - all want people to believe this. But ranchers in the Seashore and elsewhere are demonstrating that regenerative agriculture is not only real it is also the most financially viable and ecologically sound option for the food system. Successful real world examples of regenerative agriculture with livestock have been set forth in great detail by Gabe Brown in *Dirt to Soil* (2018), David Montgomery in *Growing a Revolution* (2017), Charles Massy in *Call of the Reed Warbler* (2018), among many others, which powerfully demonstrate the potential for widespread adoption of regenerative practices.

The best regenerative agriculture models, including many of the ranches in the Seashore, have strong connections to surrounding communities. In her several books and her film, *The Economics of Happiness*, Helena Norberg-Hodge urges that the most important thing people can do to protect the earth is to re-localize our economies, including with respect to food and farming. It is our very disconnectedness from our surrounding landscapes, our alienation from the people around us, and from the sources of our food and fiber that causes so many modern ills, Norberg-Hodge contends. Vibrant health - both mental and physical - is closely related to our connectedness to the people, community, and nature surrounding us. Keeping agriculture in the Seashore maintains a longstanding intricately woven community fabric in West Marin between humans, animals, nature, and our food. The people who live and work on these ranches not only generate our food they are members of our churches and civic clubs, have children at our schools and on our soccer teams, and frequent our local businesses. They are vital to our community cohesion.

Ranches are equally important to this regions environment; animal impact is essential to ecosystem function. According to an ecology textbook used at UC Berkeley, *California Grasslands: Ecology and Management*, 6,000 years ago California was home to some 19 species of browsing and grazing creatures. They, together with other large beasts who preyed on them, created and maintained Californias vast open areas and diverse, biologically active soils. Without the once-abundant large predators, (which included grizzlies, wolves, lions, and tigers), it is no longer feasible for this urban-fringe area to maintain significant populations of large wild grazing animals. Domesticated grazing animals, however, can serve as the proxies for those disappeared wild grazers and browsers. Indeed, for this ecosystem to function at its best, large populations of grazing animals are necessary.

A large body of scientific evidence shows that grazing, including by cattle, enhances biodiversity, from soil microorganisms to megafauna. Grazing animals hooves help press seeds into the soil, their mouths clip vegetation, stimulating plant growth and helping later-sprouting species of plants to germinate, and their manure and urine provide nutrients, moisture, and organic matter that help soil biology. For example, a long-term study by University of Nebraska researchers published in 2004 found more plant diversity in areas with grazing than in areas where grazing had been excluded. The 2016 textbook by Stanford biology professor Harold Mooney, *Ecosystems of California* states: A growing body of research shows that livestock grazing can enhance biodiversity. To a surprising degree, this research comes from cases in which, as part of conservation efforts, livestock grazing was removed, and subsequently, species or habitats of interest disappeared.

Grassland birds are among the most rapidly disappearing of all types of wildlife, largely because of losses of farming and ranching land and conversion of grazing areas to croplands. Work by Audubon Society, Point Blue and others have shown that well-managed ranches are essential partners in stemming the decline of bird populations. For example, recent analyses show how grazing benefits bird populations. See, e.g. What's good for the herd is good for the bird, Beef Magazine in 2019.

Some have urged that the greenhouse impact of livestock alone warrants getting rid of the Seashores ranches. But livestock's connection to climate change has been wildly mis-stated by various interest groups who are using climate change to advance their own agendas. Animal rights groups and some environmental groups have claimed that changing your diet (by reducing or eliminating beef) is the single most important thing you can do to help the climate. In the particularly ridiculous film *Cowspiracy*, the utterly specious claim was even made that more than half of greenhouse gases come from cattle. According to the U.S. Environmental Protection Agency, however, the real number is around 2 - 3% for all grazing animals (including cattle, sheep, goats, bison, and yaks).

While it is both admirable and valuable for Americans to make wise personal daily choices, those decisions have far less impact on the climate than does US policy. This point has been made repeatedly by climate leaders like Bill McKibben, and is explained by David Wallace-Wells in his recent book, *The Uninhabitable Earth: Life After Warming* (2019). Wallace-Wells calls personal dietary choices a drop in the bucket. (See interview with William Branghan, PBS, March 1, 2019).

The true impact of beef related to climate is much more accurately understood when compared with other foods. The work of Dr. Michael Lee (Head of Sustainable Agriculture Sciences, Rothamsted Research, UK) shows that when the nutritional value of food is considered, beef has a comparatively small climate impact.

Most important, recent peer-reviewed research strongly supports the case made in *Defending Beef* that well-managed grazing provides myriad ecosystem services, even including a net benefit to the climate by sequestering large amounts of atmospheric carbon. This research includes the following:

\*Journal of Soil and Water Conservation, April 2016: A collection of well-known rangeland experts, sustainable agriculture experts, and soil scientists assemble to argue that good grazing builds soil carbon, removes substantial carbon from the atmosphere, and is better for the climate than crop production. They estimate 1.2 tons of carbon per acre per year (1.2 tC/ac/yr) drawdown via properly-managed grazing, and that the drawdown potential of North American rangelands and pasturelands is 800 million tons (megatonnes) of carbon per year (800 MtC/yr). Most interestingly, the authors show that if crop production were replaced with well-managed grazing the greenhouse gas emissions of agriculture would actually decline. Teague, W. R., Apfelbaum, S., Lal, R., Kreuter, U. P., Rowntree, J., Davies, C. A., R. Conser, M. Rasmussen, J. Hatfield, T. Wang, F. Wang, Byck, P. (2016). The role of ruminants in reducing agriculture's carbon footprint in North America. *Journal of Soil and Water Conservation*, 71(2), 156-164. doi:10.2489/jswc.71.2.156 <http://www.jswconline.org/content/71/2/156.full.pdf.html>

\*University of Georgia study, May 2015: Finds 3.6 tons of carbon per acre per year (3.6 tC/ac/yr) drawdown following a conversion from row cropping to regenerative grazing. <https://news.uga.edu/farmland-management-changes-boost-carbon-sequestration-rates-0515/>

\*May 2019, study of Georgia farm (White Oak Pastures in Blufton, GA) shows well-managed beef operation having negative carbon footprint: <https://www.prnewswire.com/news-releases/study-white-oak-pastures-beef-reduces-atmospheric-carbon-300841416.html>

\* Nature article, April 2015, summarizing studies showing carbon sequestration in ag soils from good management, including management-intensive grazing. Machmuller, M. B., Kramer, M. G., Cyle, T. K., Hill, N., Hancock, D., & Thompson, A. (2015). Emerging land use practices rapidly increase soil organic matter. *Nature Communications*, 6, 6995. doi:10.1038/ncomms7995 <https://www.nature.com/articles/ncomms7995>

\* 2018 study by Michigan State University finds that well-managed grassfed cattle sequester enough carbon in soils

to offset all of their GHG emissions (including methane), i.e. 1.5 tons of carbon per acre per year (1.5 tC/ac/yr) drawdown. Stanley, P. L., Rowntree, J. E., Beede, D. K., DeLonge, M. S., & Hamm, M. W. (2018). Impacts of soil carbon sequestration on life cycle greenhouse gas emissions in Midwestern USA beef finishing systems. *Agricultural Systems*, 162, 249-258. doi:<https://doi.org/10.1016/j.agsy.2018.02.003>

Finally, while we recognize its not central to the National Park Services decision-making process, it should be noted that Seashore ranches are providing exceptionally wholesome, nutrient rich foods at a moment in history when they are desperately needed. Our nations healthcare system is literally collapsing under the strain of a population that is plagued with diet-related diseases. Meat, milk, yogurt, cheese and eggs are among the most nutritionally valuable foods. Almost a century ago, in his seminal work, *Nutrition and Physical Degeneration* (originally published in 1939, 23d printing, 2009), Dr. Weston Price, meticulously documented how humanitys adoption of processed foods and abandonment of traditional foods - especially those from animals - was leading to widespread declines in human health. Modern Americans increasingly depend on pills, powders and potions for their nutrients. In contrast, beef, (especially organ meats), butter, milk, yogurt, and cheese are exceptionally nutrient rich foods that support vibrant health.

More specifically, all of the dairies in the Seashore are organic and grass-based; many of the meat and egg operations are grassfed. Grass-based meat, dairy, and eggs, such as those produced in the Seashore, are rich in vitamin K2, a nutrient found only in animal-based foods where animals are raised on grass. Today, K2 is extremely scarce in foods due to our nation moving animals off pastures into confinement systems. The absence of K2 in our diets has contributed to high levels of many serious health problems in our population, including heart disease and osteoporosis. (For more on this topic, see: Dr. Kate Rheaume-Bleues groundbreaking book *Vitamin K2 and the Calcium Paradox* (2013), and Dr. Cate Shanahans *Deep Nutrition* (2016)).

## Conclusion

For these and many other reasons, we urge that the General Management Plan Amendment reflect a National Park Service commitment to the long-term continuation and support of the Seashores ranches. Remember, Its not the COW, its the HOW.

#7299

Name: Monson, Alexandra

Correspondence: September 23, 2019

Office of the Superintendent  
Point Reyes National Seashore  
1 Bear Valley Road  
Point Reyes Station, CA 94956

RE: Comments Regarding the Draft EIS for a GMP Amendment for Point Reyes National Seashore and the Golden Gate National Recreation Area

The Animal Legal Defense Fund (ALDF) provides the following comments regarding the draft Environmental Impact Statement (EIS) for a General Management Plan (GMP) Amendment for Point Reyes National Seashore and the Golden Gate National Recreation Area. We appreciate the National Park Services (NPS) efforts to prepare an EIS and to consider alternatives that include reducing or eliminating ranching. However, there are several environmental considerations lacking in the draft EIS that need to be adequately addressed in the final EIS. Further, given all the available information and science, the only reasonable action is Alternative F and all other Alternatives would violate the NPS Organic Act, the Point Reyes National Seashore Enabling Act, the National Environmental Protection Act, and the Administrative Procedures Act.

I. Alternatives A Through E Violate the NPS Organic Act.

The draft EIS fails to prioritize the fundamental purpose established in the NPS Organic Act to conserve the scenery, natural and historic objects, and wild life in the System units and to provide for the enjoyment of the scenery, natural and historic objects, and wild life in such manner and by such means as will leave them unimpaired for the enjoyment of future generations. 54 U.S.C. 100101(a). The Settlement Agreement specifically states that [i]n preparing the GMP Amendment and the EIS, NPS will follow all applicable law and policies, including, but not limited, [the above referenced statute.]

Point Reyes National Seashore is one of the 10 most feces-contaminated locations monitored in California. Further, California's highest reported E. coli level was on a Point Reyes cattle ranch. Runoff from ranches can not only include manure, but also antibiotics and hormones given to the animals, as well as fertilizers and pesticides. National Geographic: Ranching, <https://www.nationalgeographic.org/encyclopedia/ranching/> (last viewed Nov. 28, 2018). Allowing these impacts in an area of unique aquatic value-which is federally protected specifically because of that value-without adequately assessing and mitigating them is antithetical to the NPS's mandate and would therefore violate the NPS Organic Act.

Alternatives A through E prioritize the commercial benefits of ranching and dairy operations by expanding these industries at the expense of the scenery, natural objects, and wild life of Point Reyes National Seashore and therefore violate the NPS Organic Act. Details regarding the significant negative impacts on the environment resulting from Alternatives A through E may be found in Section III below.

## II. Alternatives A Through E Violate the Point Reyes National Seashore Enabling Act.

The Point Reyes National Seashore Enabling Act requires that these areas be afforded maximum protection, restoration, and preservation of the natural environment[.] 16 U.S.C. 495c-6(a).

Alternatives A through E pose significant negative impacts on the natural environment and therefore violate the Point Reyes National Seashore Enabling Act. Details regarding the significant negative impacts on the environment resulting from Alternatives A through E may be found in Section III below.

## III. NPS's Current Assessment of Impacts From Alternatives A Through E Violate the National Environmental Policy Act.

According to the National Environmental Policy Act (NEPA), the EIS shall provide full and fair discussion of significant environmental impacts and shall inform decisionmakers and the public of the reasonable alternatives which would avoid or minimize adverse impacts or enhance the quality of the human environment. 40 C.F.R. 1502.1. Further, NEPA requires that the agency [r]igorously explore and objectively evaluate all reasonable alternatives. Id. at 1502.14.

The draft EIS fails to adequately discuss current scientific evidence regarding the environmental effects, both positive and negative, of all the alternatives and therefore violates NEPA.

### A. The Draft EIS Does Not Adequately Evaluate the Environmental Impacts of Ranching.

Alternatives A through E include ranching and dairy operations. Yet the draft EIS does not provide current scientific evidence regarding all the negative environmental impacts due to current ranching operations and how any continued ranching operations or diversified ranching operations will negatively impact the environment.

#### 1. Water Quality

Though the draft EIS includes Water Quality analysis, this section fails to adequately discuss a wide range of environmental impacts from ranching such as how manure, antibiotics, hormones, fertilizers, and pesticides from

ranching operations impact the water quality and therefore the surrounding wildlife and human populations.

For example, runoff from farmland can carry contaminants from animal manure and urine into lakes and rivers. One Green Planet: The Gross Way Water Pollution From Livestock Affects You, <https://www.onegreenplanet.org/animalsandnature/the-gross-way-water-pollution-from-livestock-effects-you/> (last viewed Sept. 22, 2019). These contaminants, such as manure and farming fertilizers, bring nutrients such as nitrogen, phosphorus, and potassium to the water sources and these excess levels of nutrients cause algal blooms which kill fish and can cause methemoglobinemia which is fatal to human babies. Id. Manure can also contain antibiotics and hormones which have affected the reproductive system of fish in some cases. Id. Further, animal manure and urine has the ability to spread over 40 diseases to humans and can cause kidney issues and nervous system disorders. Id.

For these reasons, the only Alternative that will not have a significant negative impact on the water quality, and therefore surrounding wildlife and human populations, is Alternative F which eliminates all ranching and dairy operations.

## 2. Air Quality

In addition to threatened water quality, ranching also significantly contributes to global warming. Though the draft EIS attempts to deemphasize the environmental effects of farming by claiming that most deposition sources likely affecting the park come from sources outside park boundaries, including mobile sources, power plant and industrial sources, and regional farming operations[,] this comparison is misleading. The agency needs to consider how its actions affect global warming. *Ctr. for Biological Diversity v. Nat'l Highway Traffic Safety Admin.*, 538 F.3d 1172, 1217 (9th Cir. 2008).

For example, the draft EIS makes a point to show that NH<sub>3</sub> emissions from Point Reyes ranching only account for 11.16% of Marin Countys NH<sub>3</sub> emissions and VOC emissions from Point Reyes ranching only account for 1.34% of Marin Countrys VOC emissions. However, the draft EIS must present the data in a fair and accurate way that instead shows how Alternative F would eliminate 105.9 tons/year of NH<sub>3</sub> emissions and 46.9 tons/year of VOC emissions whereas all other alternatives would still contribute to the parks NH<sub>3</sub> and VOC emissions.

## 3. Diversification Activities

The NPS proposed action, Alternative B, as well as Alternatives C and D, allow for [a]dditional diversification activities[.] The final EIS must list every possible diversification use that would be permitted and then, using scientific evidence, analyze all potential environmental impacts of those uses and how those environmental impacts would be minimized. For example, Alternatives B, C, and D could authorize the addition of pigs, chickens, sheep, and goats to the park. Environmental analysis regarding the impacts of the addition of these species needs to be included in the final EIS and fairly analyzed against Alternative F which does not allow for diversification activities.

### B. The Draft EIS Does Not Adequately Evaluate the Environmental Impacts of Elk Herd Management.

The draft EIS does not adequately evaluate the positive impacts of tule elk to the environment and the negative impacts of the proposed lethal management practices. The proposed management practices of the free-range tule elk include: lethal removal, translocation, fencing, elk crossings, habitat enhancements, hazing, water development, and other measures as appropriate. The final EIS needs to clarify the specific actions allowed under each proposed management practice, when those specific actions may be utilized, how those specific actions will impact the environment, and whether or not those actions leave [the wildlife] unimpaired for the enjoyment of future generations. 54 U.S.C. 100101(a).

ALDF continues to strongly encourage NPS to remove lethal methods from the NPS proposed action and all alternatives. The lethal removal of the tule elk is the complete opposite of ensuring the herd is left unimpaired for

the enjoyment of future generations. 54 U.S.C. 100101(a). Additionally, as is true for many wildlife species, the indiscriminate killing of individual animals is ineffective and likely leads to increases in population due to the disruption of social structure. See J. M. Goodrich and S. W. Buskirk, Control of Abundant Native Vertebrates for Conservation of Endangered Species, *Conservation Biology* 9, no. 6 (1995).

In addition to being ecologically destructive, most lethal methods are cruel and pose a danger to both people and other animals. Devices such as Conibear traps, leghold traps, and snares often result in injury, pain, suffering or death of target and non-target animals-including companion animals, livestock, and threatened and endangered wildlife. Nationwide, these traps and other similarly non-selective lethal control devices have unintentionally killed many pets, vertebrates of 150 species, and thousands of mammals of at least 20 different taxa that are listed as threatened or endangered federally or in certain states. See Knudson, T. The killing agency: Wildlife Services brutal methods leave a trail of animal death-wildlife investigation. *The Sacramento Bee*, April 29, 2012; see also Bergstrom, B.J., L.C. Arias, A.D. Davidson, A.W. Ferguson, L.A. Randa, and S.R. Sheffield. 2014. License to kill: reforming federal wildlife control to restore biodiversity and ecosystem function. *Conservation Letters* 7: 131-142. The EIS must recognize these drawbacks when describing the proposed action and any alternatives that allow lethal removal methods.

ALDF further reminds NPS that non-lethal alternatives are a more cost effective means of wildlife management. The economics of spending public funds to kill tule elk rather than using that public money to introduce effective alternative methods of controlling alleged harm to farmed animals is unreasonable. Indeed, lethal management actions actually harm, rather than protect, Point Reyes National Seashores valuable natural resources and environment. The EIS must recognize the relative cost effectiveness of the non-lethal alternatives compared to the proposed lethal methods.

#### C. The Draft EIS Does Not Provide a Fair Discussion of Socioeconomic Impacts.

The draft EIS does not accurately and fairly discuss the possible socioeconomic impacts from the range of Alternatives. Though the draft EIS evaluates socioeconomic impacts, it fails to accurately discuss all the possible impacts. For example, though the draft EIS provides data for the loss of revenue and jobs under the Alternatives that reduce or eliminate ranching, the EIS fails to provide data on the socioeconomic benefits of replacing ranching operations with other opportunities such as visitor activities.

In addition, the draft EIS fails to fairly discuss the socioeconomic impacts of the different Alternatives. Currently, ranching in the planning area only accounts for 0.01% of the gross regional product and 0.03% of the total regional employment. The draft EIS should allow for and discuss the opportunities that could be opened up for current ranching families if NPS provided resources for them to convert their current ranching operations into more environmentally-friendly and lucrative operations.

The final EIS must [r]igorously explore and objectively evaluate all reasonable alternatives and this includes the socioeconomic impacts of those alternatives. 40 C.F.R. 1502.1.

#### D. The Draft EIS Does Not Consider the Negative Impacts on Individual Animals.

NEPAs mandate to consider direct, indirect, and cumulative effects to the human environment is broad, and encompasses ecological, aesthetic, historical, cultural, economic, social, and health effects that flow from a primary impact on the physical environment. See 40 C.F.R. 1508.8. Animals, both wild and domestic, are indisputably part of the physical environment, as is farmland and manmade environments. See *Sierra Club v. U.S. Army Corps of Engrs*, 701 F.2d 1011 (2d. Cir. 1983) (finding that fish are animals, and animals are a part of the environment); Worksheet, Determination of NEPA Adequacy, U.S. Department of the Interior, Bureau of Land Management, Horse Lake Sage-Grouse Habitat Restoration Project, p. 1 (Nevada, 2013) (including benefits to wildlife and domestic animals in a NEPA worksheet); see also *Middle Rio Grande Conservancy Dist. v. Norton*, 294 F.3d 1220, 1223-24 (10th Cir. 2002).

A sufficient NEPA analysis must include consideration of the direct and indirect injury or harassment to animals. See *Nat. Resource Def. Council v. Winter*, 645 F. Supp. 2d 841, 849-51 (C.D. Cal. 2007) (NEPA requires analysis of the effects of sonar on whales, to avoid harassment and injury); *Greenpeace U.S.A. v. Evans*, 688 F. Supp. 579, 582-83 (W.D. Wash. 1987) (including harassment to whales social structure as an effect that the National Marine Fisheries Service must consider in NEPA analysis); see also *Fund for Animals v. Norton*, 281 F. Supp. 2d 209 (D.D.C. 2003) (requiring agency to study environmental impacts of killing an invasive species); *Stauber v. Shalala*, 895 F. Supp. 1178 (W.D. Wis. 1995) (noting in dicta that NEPA would have required an analysis of the effects on human and bovine health and safety had that not already been completed by FDA); see also *Animal Legal Def. Fund v. Glickman*, 154 F.3d 426 (D.C. Cir. 1998); George Skelly, *Psychological Effects at NEPAs Threshold*, 83 COLUM. L. REV. 336 (1983).

Here, the draft EIS fails to consider the impacts to individual wild and domestic animals if ranching and dairy operations are allowed to continue under Alternatives A through E. As detailed above, lethal management methods have the potential to cause considerable harm and suffering to individual animals who are killed by these means. Yet the draft EIS does not assess impacts to wild animals beyond species-level impacts, nor does it consider dairy cows as part of the human environment that requires consideration. Other federal management agencies have considered these impacts in Environmental Assessments, as the NPS must do here. See, e.g., *DRAFT ENVIRONMENTAL ASSESSMENT FOR REDUCING BIRD CONFLICT IN IDAHO, UNITED STATES DEPARTMENT OF AGRICULTURE ANIMAL AND PLANT HEALTH INSPECTION SERVICE* (Oct. 2017). This is especially important here, where the draft EIS compares several alternatives that would eliminate specific numbers of individual elk, rather than entire herds. The final EIS needs to discuss the impacts to the individual animals killed under all the Alternatives.

#### IV. NPS Must Comply With the Administrative Procedures Act.

Finally, the Administrative Procedures Act (APA) requires that reviewing courts hold unlawful and set aside agency action, findings, and conclusions found to be arbitrary, capricious, an abuse of discretion, or otherwise not in accordance with the law[.] 5 U.S.C 706(2)(A). If the agency adopts Alternatives A-E without adequately correcting the deficiencies detailed herein, and justifying its decision in light of these considerations, the agency will be acting arbitrarily, capriciously, and not in accordance with the NPS Organic Act, the Point Reyes National Seashore Enabling Act, and NEPA.

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In conclusion, we appreciate the opportunity to provide comments and urge the NPS to consider these comments and the scientific evidence when preparing the final EIS. Please contact us with any questions or concerns.

Sincerely,

/s/ Alexandra Monson

Alexandra Monson, Legal Fellow  
on behalf of  
Animal Legal Defense Fund

#7300

Name: Ross, Jacquelyn

Correspondence: Please do not kill the elk. Livestock can be seen anywhere. The elk are an incredible sight and key to the health of the local ecosystem.

Thank you.

#7301

Name: Sooby, Jane  
Correspondence: Point Reyes GMP Amendment EIS  
Superintendent  
Point Reyes National Seashore  
1 Bear Valley Road  
Point Reyes Station, CA 94956

Sept. 23, 2019

Dear Park Superintendent,

Thank you for accepting public comment on the Draft Environmental Impact Statement (EIS) for the Point Reyes National Seashore General Management Plan Amendment.

CCOF is a nonprofit organization governed by the people who grow and make our food. We are supported by an organic family of farmers, ranchers, processors, retailers, consumers, and policymakers. Together, we work to advance organic agriculture for a healthy world.

CCOF supports organic dairy and beef producers and believes that they are excellent stewards of the park's land, animals, and other natural resources. As the draft EIS points out, organic dairies on Point Reyes National Seashore are a significant source of milk to nearby dairy processors and creameries, and constricting or ending this supply would have negative impacts on the economic viability of these local businesses.

We are disappointed that the draft EIS does not include an alternative that combines continued agricultural production with non-lethal management of Tule elk. We reiterate CCOF's support for organic ranching and dairy farming on the Seashore \*and\* humane management of the resident elk herds. The National Park Service has an obligation to carefully balance the historical commitment to ranching and dairy production on the National Seashore with the need to responsibly manage the introduced elk populations.

Thank you for consideration of our comments.

Sincerely,

Jane Sooby  
CCOF Senior Policy Specialist

cc: Kelly Damewood, CCOF CEO  
Rebekah Weber, CCOF Policy Director

#7302

Name: Jorgensen, Jeffrey  
Correspondence: Pt. Reyes National Seashore

I am not a lawyer, but a U.S. citizen who believes in our laws, governing rules and principals such as established by the U.S. Constitution. We enter into and document our contracts so they can be examined for their faithful execution and compliance to upholding agreements as recorded. Such an agreement was made and entered into by the citizens of the U.S. with the farmers and ranchers within the enabling legislation that would create the Pt. Reyes National Seashore and Golden Gate National Recreation Area (Public Law 87-657, September 13, 1962). Review of these agreements and examination of the written legislation provided for a very clear path for the seashore. This path was agreed to by all parties concerned, ranch owners, cattle ranchers, dairy ranchers and the congress of the U.S. Provisions of that agreement, documented in the enabling legislation, provided for agreed to



compensation for acquisition of the land involved PLUS a very generous allowance for the leaseback of these lands to the sellers for their remaining lifetime or 25 years, whichever came first. These leasebacks have proven even more generous in that they were at sub-par rates when compared with non-park surrounding areas. It must be further noted that in many cases the ranchers and farmers took the proceeds and used these to acquire additional land adjacent to or outside of the park area thus increasing their holdings while taking advantage of not being displaced from the land they had sold. For various reasons over the years these leases have been extended, further delaying the transition back to the wild habitat the legislation, and purchase compensation was intended to accomplish. Enough is enough! I have carefully examined the 6 proposed alternatives generated by the National Park Service along with thoroughly reading the Environmental Impact Study of the existing park and the relation to each proposed alternative. This latter EIS I find very troubling in that much of each proposal contained in alternatives "B", "C", "D" and E are not considered. As an example; proposed "diversification" that would allow expansion of the raised animals to include pigs, goats, sheep, and chickens, plus expansion of row crops. Not only should there have been consideration of these proposals within the EIS, what about the requisite infrastructure that would be required? Would we see additional animal fencing, chicken coops, etc.? Certainly any of these kinds of additions do nothing to enhance the National Park visitor experience, they are detractors and have no place in any alternatives. These can only have been included to augment the bottom-line of the already subsidized ranchers and dairymen. No thought was given or presented to what the additional inclusion of these animals would mean in a wild predatory environment. Would a rancher be out shooting at a raptor taking on of his chickens, while visitors walk through the park? There really is only one alternative that lives up to the original enabling legislation, Alternative "F." I could site the facts presented in the General Management Plan and the Environmental Impact Statement produced along with the plan relating the various endangered plant and animal species that occur to one extent or another within each ranch, each of which will be further threatened by any alternative other than alternative "F." Certainly none of which are at all improved by any manner or form of continued ranching or dairying. I could site the results of the EIS water quality report from within the park, the surrounding area and the seashore itself. The EIS evidencing that with ranching and dairying even as they currently exist produce some of the most polluted waters in the state, a state that holds environmental standards to a very high level. I could site the current spring mowing of the silage areas that completely disregard the nesting birds and other wildlife in these areas, none of which would happen if ranching and dairying ended as was the original intent in forming the park. I could site the hundreds of native Tule elk that found home in this area long before cattle ranching and dairying who were made to die by isolating them from needed food and water during our recent severe drought. This all the while that cattle had food and water trucked in. I could site the huge amounts of manure produced by the ranching and dairying that is such a disposal problem that ranchers seem to find the only way to dispose of it by diluting it with water and spraying it on our parkland enabling legislation had intended to be returned to the wild coastal environment it began as. I could site the unauthorized (illegal) signage posted by ranchers and fencing erected denying public access to parkland they paid for under terms accepted by the ranchers and dairymen. I could site what was said in Senate testimony by the then rancher Boyd Stewart, on behalf of his fellow ranchers that "dairying with the necessity of confining large herds of cattle tightly into pasture is NOT compatible with the public ownership of land." But, I shall not site these things. Instead, I must return to the initial enabling legislation and agreement between congress and ranchers; 1) get paid for your land, 2) have plenty of time to transition out of ranching/dairying in the park altogether or into land acquired with the proceeds outside the park, 3) wind down and eliminate ranching/dairying activities with a possible exception of establishing a small demonstration ranch for educational purposes such as at Pierce Point. I find it interesting that our National Park Service has embraced a "preferred alternative, alternative "B"." Not only does this "alternative" show a favoritism in what should have been an unbiased solicitation for public comment but this "alternative" flies in the face of the original intent of the establishment of the park by blatantly advocating for the ranchers/dairymen by advocating for the expansion of operation to include other farm animals (pigs, goats, sheep, chickens, etc.) and the planting of various row crops totally inconsistent with the nature of this park area. There is even avocation within these alternatives (except "A" and "F") to build Bed and Breakfast lodging and farm stands. This to augment the bottom-line of the ranchers/dairies. The 1962 Pt. Reyes National Seashore Act specifically says "to save and preserve, for purposes of public recreation, benefit and inspiration, a portion of the diminishing seashore of the United States that remains undeveloped." This certainly does not mean expanding ranching and dairying's scope to include infrastructure that would be added to accommodate provisions not only in alternative "B" but "C", "D" and "E" as well. We as taxpayers have subsidized these ranchers and dairymen long enough. There is no obligation within any of these alternatives to further subsidize them. If their ranching and dairying are not viable

businesses while even leasing land at a sub-par rate, they should not be in these businesses and certainly not within our national Park. Alternative "F" is the only alternative that lives up to the reason for the part, to the enabling legislation and to the expectation visitors have when visiting a National Park.

Regards, Jeff Jorgensen

#7303

Name: Brower, Kenneth

Correspondence:

Cicely Muldoon, Superintendent

Point Reyes National Seashore

1 Bear Valley Road

Point Reyes Station, CA 9495 September 22, 2019 Sept 20, 2019

Re: Comments on PRNS General Management Plan Amendment

Dear Cicely Muldoon,

I want to weigh in on the future of Point Reyes National Seashore as a private citizen, someone who watched as a boy - a fly on the wall - as the park was established and have followed its history, and all its trails and shorelines, through all 57 years since.

Below is an Oval Office group portrait by White House photographer Abbie Rowe. It is September 13, 1962 in the photograph, and President Kennedy is signing the enabling legislation for Point Reyes National Seashore. The tall, white-haired man on the far right is my father, David Brower, the first executive director of the Sierra Club. He represents the environmental movement at this gathering. [I find I can't attach a photo to this form. I'll follow this with a print version with the photo included}.

In the late 1950s and early 1960s, my father threw the resources of the Sierra Club into the campaign to make Point Reyes a national park and he lobbied for that designation on both coasts. He edited, designed, and published a Sierra Club book, *Island In Time: The Point Reyes Peninsula*, by the great environmental reporter Harold Gilliam, whom he persuaded ("relentlessly needled," in Gilliam's words) to write the text. He wangled a foreword from Interior Secretary Stewart Udall. He ran the text and layout by me, his teenage son.

That book is everywhere in this photograph. Congressman Clem Miller of California, author of the Point Reyes legislation and the point man in the campaign for the park, stands at JFK's left shoulder, holding *Island in Time* under his arm. Secretary Udall, third from the left, holds his copy in hand. Congressman Wayne Aspinall of Colorado, farthest left, wants nothing to do with the book. He has set his copy down on the Resolute Desk. (Aspinall, the scourge of the nascent environmental movement, has stalled passage of the Wilderness Bill for four years and will block it for two years more. "We have seen dream after dream dashed on the stony countenance of Wayne Aspinall," my father has complained to the *Wall Street Journal*. The congressman has countered that my father and his preservationist ilk are "aristocrats" and "over-indulged zealots.") Lucky that these two stand at opposite ends of the room.

None of the thirteen men pictured here is alive. The John Kennedy of this photo has a year and nine days left before his assassination. Congressman Miller, who regarded this moment - creation of PRNS - as the highpoint of his career, has just twenty-eight days left before the plane crash that kills him. Old age has claimed all the rest. We can no longer quiz any of these men about their feelings that day in the Oval Office, or their intent in framing this legislation, or their hopes for Point Reyes National Seashore. This is unfortunate, for these are questions being debated today as the fate of the park is decided.

As that fly on the wall during the gestation of park, and as relative or acquaintance of several of those in the Oval Office photo, and as acquaintance of other PRNS founding fathers and mothers not present at the White House that day, I'll presume to testify on their behalf.

I have read Paul Sadin's excellent, NPS-sponsored administrative history of the park, and the relevant Congressional testimony. When Secretary Udall came out for the park's 40th anniversary, I compared notes on the history with him. It is an historical falsehood- -despite the widespread myth otherwise- -that the park's founders ever intended that ranching be permanent. As Paul Sadin points out in his study, preservation of ranching was never featured in the arguments for establishment of the park. Clem Miller, in persuading his colleagues to vote for his bill, never suggested that "historical" ranching was integral to the national seashore, nor did he advertise ranching as a selling point. Rather the opposite, as his fellow congressmen were uneasy, justifiably, at the prospect of a national park with commercial ranching inside.

The idea, and the deal, was that ranching would continue on leases while the government raised the funds to acquire the private rangeland needed to expand the park. This would make for a transition period easing the ranchers' separation anxiety and the county's loss of tax base. Congress allowed owners of agricultural property to reserve a right of use and occupancy for twenty-five years or the life of the owner or her spouse as a condition to acquisition. A sunset clause, on which the sun has long since set.

Alternative F of the GMP amendment- -an end to ranching at the seashore- -was the founders' intent from the start.

Alternative B, the "preferred" alternative of the NPS- -new 20-year leases, diversification of agriculture to include goats, sheep, pigs, chickens, and row crops, Bed & Breakfasts, retail farm stands, and the shooting of native tule elk to make room for all this livestock and other enterprise- -would have been the founders' nightmare, had they been capable of dreaming that such proposals would someday be made.

Before me now, as I write, I have laid a pen from the Resolute Desk, the one John Kennedy gave my father after signing Point Reyes National Seashore into law.

The act that this pen legalized specifies that the park's first priority be the natural environment. Property acquired for the park by the Secretary of the Interior, "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."

The italics are, or would have been, my father's. The question he would ask, if he could, is this: can commercial ranching operations ever be consistent with maximum protection, restoration, and preservation of the natural environment?

The NPS, in its 2013 Coastal Watershed Assessment for Point Reyes National Seashore, noted that among the principal threats to water quality on Point Reyes was bacterial and nutrient pollution from with ranches and dairies. "Extremely high fecal coliform concentrations have been documented in streams adjacent to existing dairy operations." The Drakes Bay, Limantour, Kehoe, and Abbots Lagoon areas were particularly polluted. "Extremely high fecal coliform concentrations have been documented in streams adjacent to existing dairy operations," and that areas where dairies spread manure "are correlated with the increased presence of invasive and noxious weed species."

A commandment of Management Policies ("the primary source and foremost authority in the Park Service's directives system," according to the NPS) decrees that commercial grazing will be allowed only where it "does not cause unacceptable impacts on park resources and values." Are heavy fecal coliform concentrations in waterways, eutrophication of creeks and ponds from nutrient run-off, and the spread of invasive and noxious weeds all acceptable impacts?

Cattle are responsible locally for "the vast preponderance" of greenhouse gas emissions at Point Reyes, according to another NPS study. Are these proper atmospheric conditions for a national park? Is outgassing on this scale what we want at Point Reyes National Seashore?

A further directive of Management Policies is that the NPS "will phase out the commercial grazing of livestock whenever possible." What makes phase-out impossible at Point Reyes?

A large part of this national seashore is in the hands of commerce, and the remainder is in the hands of an agency created, a century ago, to protect American landscapes from commerce. PRNS has a split personality. For the entire history of the park, two disparate ideals of land stewardship, protection vs. production, have been at odds. The park is a house divided. Alternative F of the GMP ends the civil war that has raged since the 1978 reintroduction of elk and intensified during the Drakes Bay Oyster Company controversy early this century. These wars have left both sides weary.

Alternative B perpetuates a divided house forever.

My father, in his publisher's note for *Island in Time: the Point Reyes Peninsula*, opens with an account of a trip our family took to Point Reyes at the height of the battle to establish the national seashore, a drive out to the beach at Limantour. We, his four kids, were anxious to get down to the sand, but we never made it. "You can't park there. That's private property," a man with a hammer, a carpenter, shouted when we reached shore.

"Where then?" asked my father.

"This is all private property, down to the tide line. If you want to get to this beach, go down to Bolinas and walk up along shore." Some walk. That hike from Bolinas would have been a fourteen-mile death march along the foot of steep cliffs pounded by surf.

The carpenter was part of a land rush. As creation of a national seashore grew ever more likely, developers hurried to fabricate a fait accompli that would defeat the park. Big signs went up along the shore. "Here soon. Drakes Paradise Estates," read one. "Drakes Bay Estates. Beach Development," read another. A new asphalt road ran along the Limantour dunes, marked off at intervals by red fire hydrants, with street numbers posted and some lots marked "sold." East of Limantour Spit, on the mainland shore of Limantour Estero, the bulldozers had gouged out a grid of subdivision streets, and several houses had gone up. The carpenter was nailing the frame of a new one.

But he miscalculated. No trace of his carpentry remains. You can still find a few house foundations in the brush at Limantour, but the walls are long gone. The shore that the carpenter declared private property is now public, part of the Phillip Burton Wilderness. As such it is the property of the ospreys that overfly it, the snowy plover that nest in its dunes, the harbor seals that haul out at the tip of the spit, and the humans who come just to see. It is a national seashore owned equally by all Americans and open to all peoples of the world.

"The peninsula is what we have and there is no more where it came from," my father concludes his note in the book. "It is part of a shore that must serve uncountable millions in the more crowded time to come. We need to have what it takes to act boldly in their behalf-to save enough in the first place, and to remember, ever after, that the important things are not those we put on that shore, but those we find have always belonged there."

The Park Service needs to act boldly, once again, on behalf of those uncountable millions in the more crowded time to come. The Park Service needs to remember, ever after, that the important things are not those we put on that shore, like cattle, sheep, goats, and hogs, but those native creatures that have always belonged there.

Sincerely,

Ken Brower

#7304

Name: Black, Michelle

Correspondence:

It is time that we choose to be an example of humanity, not cruelty.

I would like to begin by recalling what Mahatma Gandhi once stated: "the greatness of a nation and its moral progress can be judged by the way its animals are treated."

This includes ALL animals, both wild and domestic. In terms of preserving the ecosystem and maintaining the proper balance to sustain it, it is critical to preserve native wild species. Changing that balance has consequences, some of which we cannot foresee and will not know until it is too late to correct. That doesn't mean any domestic species need to be harmed in any way. That would be just as wrong and inhumane. It is about finding a healthy balance for ALL involved, WITH HARM TO NONE.

We now have an opportunity to be a leader in the world by demonstrating that all living things matter and that all deserve to be treated with dignity. We do not have the right to be cruel or exploit other living beings simply for our convenience. An atrocity is no less so just because a license is granted or a law is written. All animals have complex needs, feelings, and behaviors; and unfortunately, many people have downplayed that in order to justify their own actions. Human beings are capable of greatness - great humanity and great cruelty. On which side will we be remembered?

Human nature - at its best - requires us to recognize and honor the rights of all living creatures.

I thank you for considering my comments.

#7305

Name: Hardy, Dian

Correspondence:

"To conserve the scenery and the natural and historic objects and the 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."

Organic Act of 1916 establishing the National Park Service

As a member of the public, I see no need to buttress my statement of concern with footnotes or references to past or ongoing studies and I would sincerely object to your terming my submitted comment non-substantive, which would limit the input of ordinary citizens.

Therefore I state that by my own fieldwork over the course of years, I believe the NPS is failing to comply with its stated mission, see above, by continuing to extend the lease of dairy ranchers at Pt. Reyes, especially to the detriment of the Tule elk, who may be "culled" at the exhortation of the ranchers.

Alternative F is the best of the stated alternatives. If not that, restrictive grazing options should be developed in a supplemental EIS, like an alternative that phases in a 50 percent cow stocking rate reduction over 5 years, or 75 percent over 10 years.

Dian Hardy

Founder, Sealwatch Program

#7306

Name: N/A, N/A

Correspondence: I do not support the killing of elk for expanded cattle grazing.

#7307

Name: Streuer, Gabriele

Correspondence: Please protect our Elk herds! We don't need more grazing of cows, we need to protect these animals. It is one thing to allow selective hunting, another to decimate the Elk herd in Point Reyes national seashore! The Elk don't destroy the fragile landscape but enrich it- cows don't belong in the National Park! Do NOT allow this destructive proposal!

Thank you,  
Gabriele

#7308

Name: leavitt, monica

Correspondence: The last thing anyone needs, aside from ranchers themselves, is more ranches. Ranches are a major source of pollution, and scientists have beckoned the world to move away from eating meat. Furthermore, with rising sea levels, we would be grossly negligent to allow the endangerment of cattle and other animals being raised, and economically speaking, ranches by the ocean would prove a major liability. How about preserving the open space? How about keeping these ranchers from killing more elk, and trees, just for short-term profit?

#7309

Name: Bennett, Sharon

Correspondence: I am writing to oppose the latest proposal by the NPS regarding the Tule elk in Point Reyes National Seashore. I visited California recently and made a point to get up to Point Reyes as it is one of the prettiest spots in Northern California. My husband and I hiked the Tomales Point trail all the way out to the very end. Along the way we had the absolute pleasure of seeing and hearing the elk in their reserve. Seeing the elk was definitely one of the highlights of that hike and removing them from their protected area is unimaginable to me. They belong in Point Reyes, where the public can see them. As a taxpayer, whose taxes go towards funding the national parks, I urge you to keep the elk where they are in Point Reyes. They should not be removed just to appease some ranchers. Please keep our national park what it is, a sanctuary for Tule elk and a haven for those of us looking to escape the frenetic pace of life and enjoy some time surrounded by nature's beauty.

#7310

Name: Williams, Diana

Correspondence: Gentlemen: For years, we have visited this area on our vacations in your state. We especially enjoy seeing the Elk and know their numbers are only around 600. It took years of planning and habitat restoration to get the herd to its current level. We know that in 2017, you, the NPS were required according to a court order to submit a plan making it clear what amount of destruction thousands of beef and dairy animals would impose on this limited area. From what we have read, no such plan has been provided. That is an awful lot of animals and the impact on land of their feeding, drinking and eliminating will be substantial and could cause a crisis on this land - which is public land - let's remember.

California in the last several years has suffered serious droughts, all consuming fires and other devastation.

This is recreational land, not farm land. It is not to be used to grow crops. The wildlife now are not in conflict with new encroaching animals. Let us keep it that way.

You are supposed to be the guardians of our land, you as NPS have been designated that honor and responsibility. I hope to hear that you have taken this responsibility seriously and will do the right thing. Thanks.

#7311

Name: Burriss, Connie

Correspondence: I am contacting you I do not agree with your plan to kill elk every year to appease private livestock owners who enjoy and appear to be privileged subsidized grazing of their cows on this public land. We should not be helping ranchers graze cattle, goats, sheep, chickens, or pigs which only damages wild lands which pollutes water-degrades wild lands and makes soil erosion. Nor should crops be able to be planted which in turn destruction of our Wildlife and Wild lands

These plans are A recipe for more destruction and conflict with rare native Wildlife

Please No killing wildlife

No grazing on Point Reyes National Seashore

Please drop plans of destruction to these wildlife habitat

Thank you

#7312

Name: Marckesano-Jones, Paula

Correspondence: We must not sacrifice existing wildlife habitats to the cattle industry. Cattle ranching is an imbalanced use of resources that contributes to climate crisis, and from its inception has resulted in the destruction of indigenous people, plants, and animals.

#7313

Name: Malberg, Jennifer

Correspondence: I strongly oppose the use of the public lands of Point Reyes for cattle grazing and ranching and am voicing my support for Alternative F. The rare and beautiful space that is Point Reyes National Seashore (not Point Reyes cattle ranch!) should be set aside for "public enjoyment and inspiration", in keeping with the stated purpose when first established by Congress.

As someone who grew up in a rural setting and personally raised cattle, I know first hand the destructive nature of cattle grazing on land. As any biologist or naturalist could attest, the existence of 6,000 cattle given the damage they cause to the landscape and massive amounts of waste they create, is absolutely incompatible with the opportunity for Native Tule elk and hundreds of native plants to flourish. The simple ratio of cows to elk of 10:1 illustrates how far things have strayed from the original stated purpose for the Point Reyes National Seashore. This land belongs to all the people of the United States, not the special interests of the local ranchers. Subzoning or fencing the Seashore and killing Tule Elk each year to limit their population in favor of ranching interests is an unacceptable use of the land.

In 2019, with the destruction of climate change upon us, we MUST do all we can to preserve and preserve open space where oxygen-producing vegetation can proliferate over methane-gas producing, environmentally destructive livestock. Implementing Alternative F is a perfect opportunity to do so in a meaningful way for the longterm benefit of the citizens of the area and the region.

It has been well-established that the enjoyment of wide open spaces in nature is beneficial for human health and well-being. In 2019, children (and their parents!) are more stressed than ever with fear of school shootings, the impending threat of climate change, and "noise" of urban living. Spending time in nature is a cure for just about anything that ails a person. To quote the great John Muir, "Thousands of tire, nerve-shaken, over-civilized people are beginning to find out that going to the mountains is going home; that wildness is a necessity" The same holds true for the precious and wild Point Reyes National Seashore and for certain, has NEVER been said of cattle ranching!

Please consider the long-term benefits of FULL protection of this national treasure and uphold the original, stated purpose of setting aside Point Reyes for the enjoyment and inspiration of ALL the people of the United States.

#7314

Name: Cobb, McCrea

Correspondence: Alternative B states: NPS would actively manage the Drakes Beach herd. Based on estimated forage consumption by elk, forage productivity on ranches, and time that elk spend on ranches, as well as NPSs capacity to manage elk, NPS has set a population threshold of 120 adult elk for this alternative. NPS would manage to the population threshold using lethal removal methods. Elk from the Limantour herd would be monitored closely and managed in consideration of ranch operations.

Comments:

-A population threshold of 120 elk for the Drakes Beach herd seems unrealistically low. Elk productivity, survival and associated herd growth vary inter-annually as a function of annual and decadal (El Nino) fluctuations in rainfall and its interaction with herd density. Therefore, one produce a single estimate of herd carrying capacity at Pt. Reyes; it varies in response to weather and other factors. By 2017, the Drakes herd already numbered at least 112 elk and herd growth showed little density dependence (i.e., exponential growth). It is unclear how changes in range conditions have changed with this associated increase in elk abundance, but it is likely minimal at this point. Together these provide evidence that the herd is not approaching carrying capacity at Drakes and could be closer to carrying capacity (maximum sustained yield). Limiting herd sizes to 120 elk will therefore a great effort and involve many annual lethal removals. I strongly recommend reevaluating elk carrying capacity at Drakes, which will likely result in increasing the 120 elk limit.

-Yearling elk are smaller than adults, and their forage consumption is lower than adults. If the forage consumption model considers yearlings as adults then the model would have produced inflated estimates of elk forage consumption and deflated estimates of carrying capacity.

- The forage consumption model assumes 100% overlap between elk and cattle, which is not realistic or backed by empirical evidence. In fact, most studies find niche partitioning between these species, and in some areas, competition between cattle and elk is negligible. See: Halbritter, H. and L Bender. 2015. Herbivory of sympatric elk and cattle on Lincoln National Forest, south-central New Mexico. *Forest Ecosystems* 25: 2. Unless local elk diets were empirically compared to cattle at Pt. Reyes, this is a big assumption that could substantially increase carrying capacity estimates of elk.

Alternative B states: No new elk herds would be allowed to establish in the planning area.

Comment: It is unclear how this could be realistically achieved. Bull elk from the Home Ranch region have historically moved between the Drakes and Limantour herds, especially during the rut. Will these bulls be considered? In addition, as Cobb (2012) shows, elk herd dynamics at Pt. Reyes (Tomales Point) can be fluid. If the Drakes herd splinters into multiple sub-herds, will these be considered new herds? How would the 120 elk threshold then be applied?

#7315

Name: Flores, Johnathon

Correspondence: As a member of the California-based international animal protection nonprofit organization In Defense of Animals with over 250,000 supporters, I oppose the National Park Service plan to kill native Tule elk, grow commercial crops, and permit ranchers to add chickens, turkeys, sheep, pigs, and goats to their exploitative operations. For this reason, I support Alternative F.

As national park land, this property was specifically set aside to protect, restore, and preserve the natural environment including the wild animals who live there. The original intention was to phase out dairy and cattle



ranching, not add more crops or animals to increase ranching profits. I am sure that you can agree that this is no way to celebrate the biodiversity found in the United States of America. Currently, there is one National Park that these Tule elk call home. Also,

The proposed plan does not address the damage from grazing, including water-quality degradation and soil erosion. Also, adding new crops will create more conflicts with native wild animals.

Please abandon this inhumane and destructive plan by selecting Alternative F. I urge you to restore the Seashore's Pastoral Zone for wild animal habitat and repurpose historic ranch buildings for scientific research, interpretation, and public education.

Thank you for your consideration,

Johnathon Flores

#7316

Name: N/A, N/A

Correspondence: Really upsetting to hear that the public land might not be protected. The native elk belong on those lands, not commercial ranchers.

#7317

Name: Bartlett, Scott

Correspondence: Do not let this happen. Wildlife has already been forced out of too much of their habitat, and cattle are one of main reasons for our methane problem. It's all for greed and profit. Enough is enough!

#7318

Name: Hinz, Robert

Correspondence: The correct preferred alternative is obvious: Ranching Should Be Ended.

The National Park Service's purpose is to preserve and protect the natural landscapes of the United States for the benefit and enjoyment of the public. The NPS should be preserving and protecting the increasingly endangered coastal habitat such as that found at Point Reyes. Where is the effort to restore any of the habitat degraded by ranching?

The short grass habitat could apparently be provided by the elk since the ranchers 'know' that the elk are eating too much of their cattle's grass. Where are the ground squirrels that should be living at Point Reyes? Where are the burrowing owls that live in the squirrel burrows?

It is not the purpose of the NPS to make ranching on Point Reyes a profitable or more profitable business. It would not be a beneficial precedent for managing our other national parks.

The USA has a surplus of dairy products and consumption of milk has been in decline for decades. Point Reyes does not need diversification. There is nothing historic or culturally significant about hog farming, raising sheep or goats, planting row crops or adding chickens to the landscape. There are many places for the public to see those things. As for chickens, ten for each ranch would be enough to provide fresh eggs.

The ranches of Point Reyes are public property that now do not fulfill that purpose. The ranches are not in-holdings; ranchers sold them and we, the public own them. The NPS did not buy those lands because the NPS wanted to be a landlord, especially not a toothless landlord without real authority to manage ranch lands in an environmentally sound fashion. The water quality does not meet state standards. Some areas are overgrazed. The

number of cattle exceeds the 'allowed' number. Sounds to me like there should be some culling of cattle, not elk.

The NPS bought those ranches because NPS expected ranching to end, not necessarily in one year or five, but to end before ranchers' great-grandchildren would be the new ranchers.

Things you will never hear as attractions of Point Reyes: "Hey, kids, let's gather some dry cow dung, build a fire and roast some marshmallows or make s'mores." or "Dear, It's a nice warm day. Let's go to Point Reyes and smell the hog farm."

The general public does not generally know that they are entitled to hike all through the ranches, and the ranchers do not want people hiking in the pastures. The public can see cattle elsewhere in Marin County. They could even go to a petting zoo for an up-close experience. Hog farmers do not want people bringing swine fever (hog cholera) or African swine fever or porcine epidemic diarrhea to their operations. Public, keep out!

Adding more farm animal species will bring more management problems that the NPS does not need. Ranchers do not want their lambs or kids to be feeding coyotes or mountain lions. How would that predation be stopped? Shoot the wildlife? Poison the coyotes? That doesn't sound like something the NPS should be doing on its lands.

Shut down ranching and relieve the poor ranchers from their struggles to make a living. In the meantime, charge the ranchers enough to pay for overseeing their businesses and correcting environmental problems that arose from improper ranching operations. Convert a few ranch buildings to facilities where the public could be informed about the human history and natural history of Point Reyes. Restore the degraded ranch land. Then, at last, there would be a benefit to the public who owns these lands.

#7319

Name: N/A, N/A

Correspondence: Utilization of NPS land should be centered on protecting natural resources within the property. Continued use of the property for private agricultural uses undermines the mission of the NPS and serves to benefit few citizens at the expense of taxpayers. Restoration and management of native wildlife (Tule Elk) should take complete precedence over agriculture.

#7320

Name: Massey, Rachael

Correspondence: Raising cattle causes deforestation, ruins our environment, and kills the few wild animals we have left. Stop killing wild animals to raise cattle!!!

#7321

Name: Kirks, Susan

Correspondence: This comment is from:  
Madrone Audubon Society

September 22, 2019

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

Re: Pt. Reyes GMP Amendment EIS

To Whom It May Concern:

We write on behalf of members of our conservation nonprofit organization, Madrone Audubon Society (Madrone Audubon). Madrone Audubon is the Sonoma County Chapter of National Audubon. We serve approximately 3000 members. All of us regularly visit Pt. Reyes National Seashore for the incredible natural environment, wildlife and birds, and the exceptional public amenity Pt. Reyes National Seashore as a national park represents - for residents and visitors from around the country and international origins.

In review of the EIS and proposed GMP Amendment, we support Alternative F - No Ranching. This alternative would end ranching within the national park and land would be repurposed for 'visitor opportunities.' The Tule Elk would be allowed to expand their range in the park.

As we consider protection and sustaining of PRNS' revered natural features, now and for future generations, we must address global warming and climate change impacts as a priority in any such consideration. Action and a plan to conserve and sustain Pt. Reyes National Seashore, a most precious national park with exceptional landscapes, wildlife and birds, should be the #1 priority. We must consider water quality and impacts of cattle on fresh water streams and creeks, along with the fact cattle are the leading source of greenhouse gases at the Seashore. We do not support any discussion of ranchers being able to diversify into additional areas of ranching and growing. Introducing such practices would inevitably create wildlife conflicts related to predator-prey, further impacts to grassland, and negatively impact what should be a natural environment by introducing different ranching practices, using the same land.

Among the laws that govern how the National Park Services manages Pt. Reyes National Seashore is the 1916 NPS Organic Act. § 100101 (a) In General - includes use of the National Park System by means and measures that conform to the fundamental purpose of the System units, which purpose is "to conserve the scenery, natural and historic objects, and wild life in the System units and to provide for the enjoyment of the scenery, natural and historic objects, and wild life in such manner and by such means as will leave them unimpaired for the enjoyment of future generations."

In addition, the PRNS statute seems to clearly indicate in § 459c-6. Administration of property, "(a) Protection, restoration, and preservation of natural environment."

In 2019-2020, as the Amendment to the Management Plan and alternatives are considered, the alternative that supports your governing laws and statutes, including prioritizing the natural environment and exceptional natural features of Pt. Reyes National Seashore, is Alternative F. The Tule elk population at PRNS should not be shot or fenced off in support of ranching operations, and diversifying ranching operations would only contribute to more negative impacts and imbalance with the natural environment.

We urge the decision in favor of your enabling legislation and statutes governing Pt. Reyes National Seashore, and Alternative F is the most appropriate and relevant choice.

Sincerely,  
Susan Kirks, President Madrone Audubon Society

#7322

Name: Ryce-Paul, Roxanne

Correspondence: I urge the NPS to adopt Alternative F, which would discontinue farming and ranching opportunities in the park and expand visitor opportunities.

Preservation of native wild species must take precedence over farming and ranching activities. Grazing negatively affects ecosystems, causing water pollution and soil erosion, spreading invasive species and disease, and harming endangered species.

In fact recent trends show American are eating less and less meat - choosing instead plant based meat alternatives. The market for cattle and pigs is dying we don't need 5500 more cows, we need to restore America's wild lands and that happens when the NPS preserves a natural balance. The Drakes Beach elk herd and the and the Limantour herd are native to California belong to Point Reyes National Seashore.

#7323

Name: N/A, Mario

Correspondence: There are a few areas of the analysis which I feel are lacking or are contradictory.

1. The benefit vs cost of cattle vs Tule Elk grazing:

The EIR states that uncontrolled Tule Elk population would have an adverse impact on ranching and dairying operations due to the competition for forage, and that alternative B would require control of the Tule Elk population. The EIR then states that the loss of cattle under alternative F would likely have an adverse environmental impact due to a loss of grazing yet does not properly analyze how increased grazing from a growing Tule Elk population could mitigate those adverse impacts. The EIR seems to take the contradictory position that an uncontrolled elk population would consume too much forage, but that an even faster growing population (under alternative F) would have no impact on the control of invasive species or the maintenance of coastal prairie land.

The EIR makes use of detailed modeling to calculate the residual dry matter in the grazing areas with various combinations of elk and cattle in order to explore how cattle and elk can be managed together (Appendix I). With this foraging computation toolset the predicted foraging of an increased elk population under Alternative F could have been used to make more substantive prediction of the environmental impacts. The current analysis is incomplete in this regard.

2. The emphasis of cattle ranching/dairying over all other cultural resources:

The EIR states that the desired conditions for preservation of cultural resources include Register of Historic Places (National Register), and historic and prehistoric archeological sites and ethnographic resources. The EIR makes very little effort to explore any other cultural resources outside of ranching and ranch buildings. The area has been host to many eras including indigenous peoples, the Spanish occupation, and even a bit of whaling. The emphasis of ranching over all other cultural history is unexplainable and lacking.

3. No discussion or analysis of the preservation of historic or "traditional ranching and dairying":

In the enabling legislation and purpose statement for the PRNS historic preservation is listed in both documents, and further legislation has further emphasized that agricultural leases should be issued for "traditional ranching and dairying". Given those facts, the EIR's emphasis on modern ranching and dairying is puzzling as there is no discussion of the preservation of historic practices, tools, and methods anywhere in the EIR. The PRNS was not established to preserve commercial agriculture, it was established to preserve the history of commercial agriculture at the time of it's establishment.

Currently there is no preservation of historic ranching/dairying outside of some of the old structures themselves. There is no public outreach and no way of the public to experience or view historic dairying or ranching using traditional methods and tools. Furthermore the inclusion of diversification on the ranches seems counter to the stated goals in both the enabling legislation and the draft purpose statement.

4. Lack of any basis for the diversification of agricultural use:

The preferred alternative B includes allowing ranch lease holders to get permits for alternative uses of historic cattle ranches. There is no stated basis for this inclusion and limited analysis of its impacts. The diversification of the lease uses appears to be counter to the enabling legislation and the further legislation that states that leases should be used for "traditional ranching and dairying".

Besides diversification of crops and animals, alternative B includes the suggestion that lease holders could create destination experiences on the leased land for sales, experiences, or overnight stays. The lease holders have already been given years of economic benefit through below market rate leases for grazing and housing, while

making no efforts at all to share their historic operations with the public. The EIR also states that diversification could result in modification to historic structures which is clearly a negative impact.

If anything, under the current system the public feels unwelcome to use the leased land even though it is their statutory right. There is no analysis of any sort of revenue sharing between lease holders and the NPS for further economic use of public land. Charging the public money to experience land they already paid for in 1978 should be justified and the lack of competition for these services should be explained under the statutory framework.

#### 5. Lack of substantive analysis of visitor numbers under alternative F vs alternatives A&B:

The EIR states that under Alternatives A, B, and F that there is unlikely to be any increase in park visitors. This analysis is not supported by any data or modeling and appears incomplete. The number and variety of park user experiences will likely be much greater under alternatives B and F vs alternative A, but the EIR simply states "annual visitation is unexpected to change".

The analysis seems especially lacking when analyzing alternative F. The EIR states that alternative F would have the most beneficial impacts for visitor opportunities and experiences of all the other alternatives yet, without any explanation of methodology, states that there is no expected change in visitor numbers. This determination not only has bearing on the Public Use and Enjoyment analysis, but it also appears in the Socioeconomic analysis. In the socioeconomic analysis of alternative F it is stated that the loss of residents and workers would negatively impact the environment, yet the increase of public use and enjoyment is not expected to offset that through increased visitors.

#7324

Name: Irish, Jeffrey

Correspondence: I oppose the proposed Ranch Core subzone on 180 acres, where row crops could be grown, new buildings constructed, and onsite farm processing plants built. In addition, pigs, sheep, goats, chickens, horse boarding, yurts, lodging, ranch stays, and other commercial activities would be allowed to occur on park land, apparently for the profit of the 24 ranchers. These are not concessions, as is usual in National park units. This is not in the best interest of our community, our state, our country, or our planet. This is a myopic and selfish decision that appears to not take into consideration our wildlife and specifically our unique indigenous and endangered tule elk.

Alternative F would discontinue ranching operations and cattle grazing, and allow tule elk to establish new herds in the pastoral zone of Point Reyes National Seashore. I support this planning alternative because it has a true vision of our future and will demonstrate the integrity of the National Park Service, in service to all not to a few for profit businesses.

#7325

Name: A, Christina

Correspondence: We need less meat and dairy production if we are going to stop global warming. Not only is this plan cruel to native Elk, but it is also unsustainable.

#7326

Name: Syed, Adam

Correspondence: The NPS should not be shooting elk to serve the bottom line of ranchers.

#7327

Name: Sorensen, Dale

Correspondence: We are in a state of climate emergency and Pt.Reyes National Seashore should not be contributing to that condition. The world is losing wildlife habitat at an alarming rate and animal agriculture is one reason. The National Park was created to protect wildlife and provide opportunities for the general public to enjoy nature. The ranches have been documented as being the largest emitter of greenhouse gases, primarily methane. They also produce millions of pounds of manure annually that pollutes the creeks, the bay, eventually the ocean, it seeps into sensitive habitats contributing to lose of threatened species. And the demand for water by the dairies is unsustainable.

I know the history of how the Park was created and I know that the ranches were already paid millions for their land with the understanding that they would be phased out over a period of 25 years but somehow the ranches have remained via leases granted by the Park. Most of these leases should have expired in the 90s, they were never meant to continue indefinitely. The Parks preferred plan seems to favor the private commercial endeavors of the ranchers. This is inappropriate and violates the mandate of the National Park Service to protect and preserve the environment for future generations.

I am absolutely opposed to any culling of the Tule Elk, who were here before the ranches, the Park was right to reintroduce them. The Elk should be protected from the ranchers as the Park is the best "steward of the land."

Fencing should be erected only with Park approval, all ranching activities should be monitored closely.

The idea that ranchers would be allowed to further commercialize Pt. Reyes National Park is an abomination.

Like cows, other livestock would further degrade the land. The public has no obligation to help the ranchers make a living! Therefore I support Measure F, phasing out the ranches as was originally intended and restoring as much as possible wildlife communities and native plants particularly in the pastoral zone.

#7328

Name: Esteva , Maria

Correspondence: I am against the killing of the elk to make way for cattle grazing. I believe it this is not the way to manage federal ground in any way shape or form.

#7329

Name: Valle, Rocio

Correspondence: Please do not kill the elk to make way for cattle

#7330

Name: Fleming, Sophie

Correspondence: I am opposed to the killing of any Tule Elk in the Point Reyes area. No to the killing! No special deals for ranchers. Let's protect our wildlife and their habitat first!~

Thank you,

Sophie Fleming

#7331

Name: Loskill , Klee

Correspondence: Please stop changing the standards and regulations and to benefit the cattle and mining industries. Leave the wilderness and wildlife to live for our future and our children, not culled for industrial profit.

#7332

Name: Berger, Jay

Correspondence: Under no circumstance shall the park kill any Tule Elk.

The park should prioritize Tule Elk habitat.

The park should refuse to grant 20-year permits and leases to cattle and dairy ranchers. Ranchers have overstayed their original permit limits already. Long-term leases will set a terrible precedent in favor of private, commercial industry and jeopardize the future of our parks and the health of the ecosystem.

Absolutely no diversification of ranch operations. Any diversification (such as chicken coops, pigs, sheep, row crops, etc) will only serve to attract more predators like coyotes, foxes, bobcats that will be in conflict with ranch operations and have to be "managed" as well.

The park should revoke permits for all cattle and dairy operations and restore the leased land to its original, pre-industry state. The park should prioritize wildlife NOT commercial interests! Do you agree? Sign our online petition!! Go [HERE](#).

We would like the park to update their education and visuals throughout the park to reflect their mission- wildlife preservation. We would like to see the information tablets that currently highlight dairy and ranching history to be replaced with ones that showcase the park's biodiversity and their work in wildlife protection and restoration.

We would like the fence at the Pierce Point Elk Reserve to be ultimately be taken down so a migration corridor can be created for that Tule Elk herd.

#7333

Name: Good, Karen

Correspondence: Please do not cull the tule elk. I love seeing these wonderful creatures in their homeland. The park service should consider what is natural and healthy for the ecology and not what is profitable for ranchers. These lands are owned by the public now. We want nature in as pristine a form as possible! Thank you, Karen Good

#7334

Name: Lendon, Jessica

Correspondence: Please do not open up this park further to ranchers and commercial activities, or authorize shooting elk. The point of national parks is to preserve the land and natural habitat of plants and animals in this unique area.

#7335

Name: Kehoe, Tim and Janice

Correspondence: Dear Superintendent Muldoon,

Thank you for giving us the opportunity to give public input regarding the draft Environmental Impact Statement (EIS) for the General Management Plan (GMP).

Our ranch, along with all the other ranches have a long history here in the park. The Kehoe Family has operated a dairy on the Point Reyes Peninsula for over ninety years. We established our dairy on the J Ranch and continue current operations solely on the J Ranch. We have leased from the Point Reyes National Seashore (PRNS) since its inception in 1970. My Father had taken the longest lease offered back then of 30 years as it was his dream and goal to be here to pass this business on too many generations. We have enjoyed a good business and personal relationship with the PRNS and its administration over these years.

We are working on four generations of our family making a living and raising a family on this beautiful property. At the present time we are operating as a certified organic Holstein dairy. We received our organic certification in 2006. The milk we produce is distributed to a local dairy processing facility in Petaluma. This facility which prides itself on being a small, family-oriented business that produces a high-quality local product is why we chose to be associated with this company.

While our family supports the Preferred Alternative B, the continued ranching alternative presented in the draft

EIS, there are a few issues of concern that we would like to give input on. The first is the amount of Elk on the existing ranch land and the relocation of such Elk. The amount of 120 Elk in the Drakes beach herd needs to be reduced or moved back to the Pierce Point Range, where they can be free to roam within the confines of that range and not have conflicts in the pastural zone. If the only option is reducing the herd, it should be no more than 50 head. 120 Elk is unsustainable for an organic dairy herd to compete for the pasture that is required to meet the 120 days at 30 percent dry matter for the organic pasture usage requirement as set forth by the National Organic Program. There also needs to be some specific details on handling of the Limantour Herd if it becomes an issue in the pastural zone.

The succession issue that was documented, we feel was a fair resolution, but there was no mention of what will happen after the 20-year lease expiration. Will there be extensions beyond that or will ranching be phased out? Having lived on Pierce Point my entire life, the next generation would be in the same position that my family has been in since our original 30-year lease expired in 2001. We would like to know what the plan and process would be going forward and how that issue will be handled, so that we will know how to plan our future and hopefully not have to go through this process of uncertainty again.

In the lease addendum there is a part that requires the lease holder to live on the premises of the ranches. We believe that this is not a priority as long as the lease holder is actively involved in the day to day operations of their business. Also, with the shortage of employee housing and the restrictions put forth on our operations to expand housing, owners will need to have more creative ways of housing their employees, working within the confines of the housing units already put in place.

In closing we want thank you for the opportunity to comment on the Point Reyes National Seashore EIS. With the historical significance that the ranches and ranching families bring to the PRNS, it would be a devastating loss to the cultural heritage of this area, a heritage that cannot be replicated or replaced.

Tim and Janice Kehoe Family

#7336

Name: N/A, N/A

Correspondence: I'm writing in opposition to the National Park Service's (NPS) preferred alternative plan to shoot native tule elk in the Point Reyes National Seashore, the only national park in which tule elk survive.

Several aspects of the NPS's preferred plan for the park are inconsistent with the NPS's mission to preserve and protect natural values, native wildlife, and public access. When the Point Reyes National Seashore was created, the historic cattle ranches were granted limited leases to continue operating within the boundaries of the park. The owners of the ranches have had plenty of time to adjust their operations to accommodate the tule elk and prepare for the expiration of these leases. Instead, the ranching operations continue to enjoy large public subsidies for their operations.

If cattle ranching within the Point Reyes National Seashore does continue, the NPS should give priority to protecting the tule elk and natural values for which the park was created. The successful re-introduction of tule elk to Point Reyes, at significant public expense, should not be undermined in favor of the private, commercial interests of cattle ranchers.

The existing threats to the elk herds include restrictions on their movements from barbed-wire fencing, access to water, climate change, and infectious disease spread from cattle to elk. Over a two-year period from 2012 to 2014, the Pierce Point elk herd declined 47 percent from 540 to 286 elk because of drought and lack of access to fresh water. During the same period of drought, free-ranging herds of elk were able to increase in number because they had access to water. The NPS should be acting to improve the elk's chances of survival, not shooting them to appease private cattle ranchers' interests.

The cattle ranches already receive enormous public benefits, including subsidized grazing fees, infrastructure, and road improvements. Cattle ranching should only be allowed to continue if it can accommodate the NPS mission and goals of preserving and enhancing the natural environment. The cattle are a significant source of greenhouse



gases. The NPS's preferred management plan should be rejected because it is inconsistent with its own "Climate Friendly Parks" plan.

#7337

Name: N/A, Kathleen

Correspondence: I do not support granting 20 year leases to cattle and dairy industry. Climate science has indicated we have less than 12 years to mitigate the worst of climate catastrophe. Allowing business that has been linked to water pollution, species extinction and in Point Reyes is the culprit of over 60% of the greenhouse gas emissions, it is not a good idea to give that same industry a 20-year lease to continue degrading our national park. Point Reyes is a refuge to thousands of plants and animals. Point Reyes can be a leader in the fight for climate justice, and it starts with phasing out Beef and Dairy operations and restoring the land to its natural state. The EIS has NO MENTION of the effects of climate change in it, and does not include any information of the cattle and dairy's impact on climate change within the park.

This is the public's land, not the dairy industry. They should be completely and permanently removed from this land.

#7338

Name: Rodoni , Fred

Correspondence: There are two areas I feel were not adequately considered by the Park Service:

- Public Hunting: Since culling is an option, public hunting should be studied for both safety and the significant economic benefit that could be used for other park purposes. Just for example, Drake's Beach Road is very easy to close on November mornings for a few hours for 3 or 4 hunters escorted by skilled personnel with almost no impact on visitors.

- An Economic Study of organic dairies in the Park: Since some are claiming financial hardship from sharing grass with elk, why don't we find out if it's true. Much of the information is public record or very easy to find. Surprisingly, you can get a pretty good idea of income in less than an hour. The need for culling is at least partially the result of this possibly inaccurate information.

#7339

Name: Morrison, R.N., Maureen

Correspondence:

I am writing to voice my strong opposition of any proposal that would be fatal to Tule Elk and other wildlife and that would benefit ranching operations in the Point Reyes area.

Please discontinue grazing and please allow us citizens to enjoy this beautiful park and to be enriched with opportunities

to visit and appreciate this special place.

Please make the most ethically correct choice and adopt Option F.

Thank you,

Maureen Morrison, R.N.

#7340

Name: Kirks, S

Correspondence: This comment is submitted from Paula Lane Action Network (P.L.A.N.), a conservation nonprofit organization based in Petaluma, CA, with Naturalist Susan Kirks, American Badger specialist.

September 22, 2019

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

Re: Pt. Reyes GMP Amendment EIS

To Whom It May Concern:

We write on behalf of members of Paula Lane Action Network, or P.L.A.N., a nonprofit conservation organization based in Petaluma, CA. P.L.A.N. advocates for and works to preserve open space, habitat and wildlife corridors, and has in-depth experience in American Badger (*Taxidea taxus*) conservation and education. Susan Kirks, Naturalist, has monitored the American Badger population at Pt. Reyes National Seashore (PRNS) for approximately 15 years. PRNS is one of the few locations in the San Francisco Bay Area where the protected national park and habitat areas are able to support 1-2 adult reproducing female badgers with an estimated 8-9 adult male badgers. Corridors for both movement and dispersal that connect to PRNS include Bolinas, Tomales/Marshall, Valley Ford, and east-west to Petaluma.

A significant increased level of visitor population to one formerly populated area of the park by American Badger has resulted in displacement to other grassland areas of the park. There is a delicate balance of available habitat, sufficient prey with fresh water, and area to range for badgers at PRNS. Contrary to popular myths, badgers, reclusive, are people avoidant and are not vicious predators, but rather positive contributors to managing gopher and vole populations and soil aeration in grassland at PRNS.

PLAN supports Alternative F of the document available for review. We have reached a point in our society and culture, with this proposed amendment, where the NPS must abide by your governing statutes and relevant laws, to protect, restore and preserve the natural environment. Second to this will be the interface without too significant encroachment by members of the public, visitors, as well as reseachers and conservationists to support your ongoing prioritized efforts.

The discussion regarding diversifying ranching operations is a slippery slope and wholly contraindicated in terms of introducing proposed diversified ranching practices into PRNS. This would inevitably result in taking of more grassland habitat, negatively impacting the small American Badger population currently able to sustain and reproduce, and also create predator-prey conflicts, a reflection of the inappropriate proposal to introduce such diversifying practices into PRNS.

We do not support the recent legislation that was crafted to extend the lease periods of existing ranchers at PRNS. This was an action out of sequence and contrary to the current review process where the most appropriate decisions for the future of PRNS are to occur. We also support the Tule Elk presence and continued natural existence at PRNS. An examination of the presence of Black Bear as a native species with a potential natural predator relationship should also be examined. Fencing off the Tule Elk in favor of the ranching community is not consistent with your governing statue(s) and laws.

There will not be another present or another future into which we are moving.

We urge decision makers to embrace the exceptional national park, Pt. Reyes National Seashore, and direct it into prioritizing protecting, restoring and preserving the natural environment. This is not a time to succumb to the ranching lobby or the claims that ranching was always intended to be integral to PRNS - clearly, it was not. You must make decisions that are in the best interest, also, of the members of the public and visitors to PRNS and their health and appreciation of this national treasure.

By making the right decision and selecting Alternative F, then moving forward with a creation and review process for an implementation and management plan, the American Badger population at PRNS will be more likely able to survive and sustain, contributing to biodiversity of the species in one of the few areas where adult female badgers are able to claim and occupy selected natal territories.

Sincerely,  
Susan Kirks, Naturalist  
Chair, Board of Directors  
Paula Lane Action Network  
info@paulalaneactionnetwork.org  
707-241-5548

#7341

Name: Speraw, Andrea  
Correspondence: Dear National Park Service Administrators:

I am a long-time visitor of Point Reyes National Seashore having begun in the 1960's as a young child. What a joy to have the protections added when it became a National Seashore meaning that all native flora and fauna would be protected, as well as the public to be able to enjoy a natural, peaceful and spectacular environment for many generations to come.

So why are we so determined to protect the private industry that remain in the Park? Is this not simple sentimentality for "family farmers?" This move is in direct contrast to the mission of the Park. We should be working to strengthen the protections of natural values, native wildlife, public access and enjoyment, not weaken them by allowing private enterprise to remain. Protections should take priority over commercial activities at Point Reyes. Right now the Point Reyes ranches enjoy not only subsidized grazing fees and housing, but also taxpayer-funded infrastructure and road improvements, and publicly funded projects. Commercial activities at Point Reyes should be required to accommodate native wildlife - not the other way around.

Tule elk are an important part of the landscape at Point Reyes. Their recovery is a result of successful native ecosystem restoration, which is a key element of the Park Service's mission. It's taken a lot of time, money and effort to restore tule elk to Point Reyes, the only national park where they live. Tule elk should be allowed to roam free and forage in the park - not shot, removed, fenced or treated as problem animals.

I strongly urge you to not allow the culling of the Tule Elk. Please consider other options that are not so destructive to the wildlife that currently thrives there. We owe it to the land, its inhabitants and the public to full protect the Park, not private industry.

Thank you,  
Andrea Speraw

#7342

Name: Smith, Danielle  
Correspondence: I do not support granting 20 year leases to cattle and dairy industry. We are already on the brink of a climate catastrophe, so allowing businesses linked to air pollution, water pollution, soil erosion, desertification, ocean dead zones, and species extinction a lease to continue to degrade our national park would be incredibly irresponsible. Furthermore, the national park should be protecting the tule elk who inhabit Point Reyes, as they have already faced extinction before, coming back from merely 20 individuals.

#7343

Name: Wantz, Dana

Correspondence: As a member of the California-based international animal protection nonprofit organization In Defense of Animals with over 250,000 supporters, I oppose the National Park Service plan to kill native Tule elk, grow commercial crops, and permit ranchers to add chickens, turkeys, sheep, pigs, and goats to their exploitative operations. For this reason, I support Alternative F.

As national park land, this property was specifically set aside to protect, restore, and preserve the natural environment including the wild animals who live there. The original intention was to phase out dairy and cattle ranching, not add more crops or animals to increase ranching profits.

The proposed plan does not address the damage from grazing, including water-quality degradation and soil erosion. Also, adding new crops will create more conflicts with native wild animals.

Please abandon this inhumane and destructive plan by selecting Alternative F. I urge you to restore the Seashore's Pastoral Zone for wild animal habitat and repurpose historic ranch buildings for scientific research, interpretation, and public education.

#7344

Name: N/A, rachel

Correspondence: Please do not expand ranching access or allow more human commercial use of or reyes national park. in fact restrict commercial use of this critically sensitive ecological wonder. consider these points: All the ranching alternatives in the Draft Environmental Impact Statement involve the impairment of natural resources.

Three National Park Service laws prohibit actions that will impair natural resources (the 1916 NPS Organic Act, Point Reyes National Seashore legislation Section 459c-6, and Golden Gate National Recreation Area legislation Section 460bb).

Consequently, the Park Service should prepare a supplemental DEIS with ranching alternatives that comply with applicable laws requiring the protection of natural resources. The Park Service should then circulate that supplemental DEIS for public comment.

Thank you.

#7345

Name: Meyer, Heather

Correspondence: To who it may concern

National seashores and lakeshores are defined as coastal areas federally designated by Congress as being of natural and recreational significance as a preserved area.

**NATURAL AND RECREATIONAL SIGNIFICANCE**

Where does it say that cattle are natural and significant to a healthy ecosystem in a national Seashore?

Point Reyes is the home to over 1,000 species of animals and plants, tall cliffs, and sandy beaches. This National Seashore has important historical significance. Most experts agree that Sir Francis Drake landed in a cove within the property of Point Reyes in 1579, making Drake the first European to come ashore in California. That is the historical significance not coastal prairie ranching.

I spent many hours hiking along the beaches and trails of the national Seashore. The first time I traveled to Point Reyes, I was quite disturbed by the number of cow patties I found and I was unable to find a spot to sit and picnic amongst the cliffs. That shouldn't be the case, I don't visit to see cattle and veal crates. I visit for the wildlife and the sweeping landscapes.

The adverse impacts of ranching on soils, water quality, vegetation, wildlife and the ecosystem are undeniable:

piles of manure, muddy trails, accelerated erosion, weed-infested pastures. Is a scientific fact.

The leases should not be renewed, coastal prairie, as well as the plants and wildlife it supports, is rare and deserves full protection and restoration and must take precedence over non native cattle.

The Tule elk are unique and deserve protection. Today, around 6,000 cattle live on the land while native elk populations have dropped to 600.

450 of which are trapped in a zoo-like enclosure preventing them from roaming or ever even potentially bothering ranch lands.

Nothing was done to prevent the elk from dying, trapped unable to access fresh water the Park Service is guilty of not protecting them and played a part in their deaths.

I don't support management of the tule elk herd animals that have been hunted to near extinction have the challenge of their genetic diversity being depleted, therefore their long term survival and ability to adapt with changes the world throws at them are diminished. Small numbers, especially in enclosed areas, means inbreeding, which is generally not good or natural."

In closing I support Alternative F let the seashore rewild itself, let the elk increase their population and native species will come back to the seashore they called home.

Regards.

Heather M

#7346

Name: N/A, N/A

Correspondence: No cattle on these lands! The best way to fight global warming is to go vegan!!! Haven't you read the data? Meat eaters are killing us all.

#7347

Name: Blum, Michael

Correspondence: I would like to comment on the Park service plan to allow ranching to continue in Point Reyes National Seashore for the next 20 years. I think this is a big mistake. We need wild areas that resemble what our country looked like before it was settled and developed. The park should be allowed to heal itself from the intensive cattle ranching that has occurred for the last 100 years. Those ranches were bought and paid for fair and square along time ago. If I want to see a dairy ranch I can drive out Chileno Valley road in Sonoma county. Let native species have a safe area to survive without having to compete with cows or all the animals associated with a farms (cats, dogs, crows, etc). I know there is political pressure to let them stay and even expand. However, how can we as a country try to preserve our planet and stave off global warming if we cant even protect a national park from dairy farming. Right now in the Brazil the rain forest is being destroyed to create more ranching. We need less ranching and more pristine areas where nature and native species can thrive and we can go out and explore and discover them. Please do not succumb to the political pressure and do the right thing. Its time to put a final sunset on the Dairy farms and return the area to its beautiful original state. Thank you, Michael Blum

#7348

Name: Shannon, Peggy

Correspondence: I have several substantive comments that I expect to see addressed in both the FEIS and FMP. **TO BE CLEAR: I SUPPORT THE NO PLAN ALTERNATIVE. ONLY THE "NO PLAN ALTERNATIVE" T WILL NOT RESULT IN INCREASED NEGATIVE IMPACTS TO BIOLOGICAL AND CULTURAL RESOURCES.** All other alternatives would result in varying degress in significant impacts to water, soil, wetlands, archaeological sites and elk exclusion allong with increaseed **SOIL DEGRADATION WHILE INCREASING LIVESTOCK/WILDLIFE/CAR IMPACTS.** At a time of climate crisis and species loss it is appalling that the NPS

has strayed so far from meeting its mandate originally proscribed and funded by local tax payers. How dare you cater to the few at the expense of the many!

The "no plan alternative" is the only alternative that has been presented to the public that protects the natural and cultural resources that visitors come to enjoy. Increase tule elk herds, get rid of the cattle, do not add other agricultural activities in a NATIONAL SEASHORE. Cattle cause much greater impacts to the soil, plants, habitats, archaeological resources, wetlands, streams, etc. The ranchers were paid off generations ago and it is unfair that they can continue to operate: What a privileged status! How do I join? I would protect the historic structures and the natural and cultural landscapes, habitats and species. What do the ranchers contribute other than of course increased money and horrid environmental impacts.

I hope to address these issues item by item but have limited time. I expect to see you in court!

Blessings

#7349

Name: N/A, alasdair

Correspondence: To whom it may concern,

I am writing because I am concerned about the preservation of the wild lands of Point Reyes National Seashore. I grew up in the bay area and have spent endless happy hours exploring the beauty of Pt. Reyes. I am hearing talk of expanding the use of protected land for use in the farming industry.

The topic of whether or not the rolling green slopes of the farming land in the park are appropriate or not and whether farming in the park should be abolished may be for another day. But the thought of expanding farming into the protected lands of the park is unthinkable. This is a National Seashore and a protected national park land, is it not?

I urge you to look at adopting option F of the various proposals for land use. Thank you

#7350

Name: Petersen, Kelli

Correspondence: This comment is submitted by Kelli Petersen, a California native, and Marin County property owner and the comment pertains to the Draft Environmental Impact Statement (DEIS) for the General Management Plan Amendment (GMPA) for the Point Reyes National Seashore (PRNS). My husband, family and friends visit the PRNS regularly to view and enjoy wildlife, and walk the trails and beaches. Upon review of the DEIS, it was found to be substantially inadequate and unbalanced as five (5) of the six (6) Alternatives presented are biased with the continuation, and even expansion, of the ranching and dairy operations within PRNS. None of these 5 Alternatives are aligned to the legislation implemented in the 1960's and 1970's, which notes: • 1962 Enabling Legislation: the NPS was required to "preserve the recreation area, as far as possible, in its natural setting, and protect it from development and uses which would destroy the scenic beauty and natural character of the area" • 1972 Legislation: the NPS was to "administer Point Reyes 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, and based upon, and supportive of the maximum protection, restoration, and preservation of the natural environment within the area." • In addition, the 1962 Enabling Legislation states, "Except for property which the Secretary specifically determines is needed for interpretive or resources management purposes of the seashore, the owner of improved property or of agricultural property ... may, as a condition of such acquisition, retain for himself and his or her heirs and assigns a right of use and occupancy for a definite term of not more than twenty-five years, or, in lieu thereof, for a term ending at the death of the owner or the death of his or her spouse, whichever is later." Therefore it is unclear why in 2019, and per the 1960-1970 legislation noted above, the NPS would allow the continuation of ranching and dairy activities in PRNS

based on its documented support of Alternative B. Alternative B in the DEIS allows: - The continuation of cattle ranching and dairy farming in the PRNS - An expansion of cattle ranching and dairy farming in the PRNS with the addition of pigs, sheep, goats, etc - Lethal removal of the reintroduced native tule elk that trespass on to ranching/farming lands in PRNS, also known as public lands

The domesticated cattle, the ranchers and dairy farmers, have negatively impacted what should be a pristine and natural environment. PRNS visitors are exposed to large areas of erosion caused by dairy cattle, mounds of manure, horrendous odors from the manure, and dilapidated ranch and dairy buildings. I have visited numerous National Parks in the United States and the world and I have never seen such unsightly situations as I have seen in my local National Park, PRNS. Why do my tax dollars continue to subsidize cattle ranchers and dairy farmers in PRNS, who were already paid for the land decades ago, and who have proven to have minimal concern on the negative impact of the public land in this national park? I support Alternative F in the DEIS, which requires the cessation of cattle ranching and dairy farming within a 5-year period. In addition, Alternative F, per the DEIS Environmental Consequences section, will also provide the following local and global environmental benefits: • Soils - "... cessation of ranching would eliminate all impacts on soils associated with ranching activities." • Water Quality - "... impacts on water quality would be noticeable, long term, and beneficial because ranching activities would be phased out across the entire planning area." • Vegetation - "... vegetation composition would likely change in areas where ranching is removed. In these areas, while the cessation of grazing would eliminate adverse impacts such as high-intensity-use areas... impacts on other federally listed plants that occur in certain habitat, such as dune or serpentine habitat, may be beneficial because the potential for cattle to trample individual plants would be reduced... Elk management actions under alternatives B, C, and D could result in highly localized impacts because of trampling." And although this section indicates that "Eliminating livestock grazing could also adversely affect several federally listed plants that occur in coastal grassland because grazing is the most effective tool for promoting their persistence with respect to competition with other non-native grassland species," it does so without recognizing the role grazing plays in spreading the invasive species in the first place. • Wildlife - "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 and would reduce high-intensity-use areas compared to existing conditions." • Tule Elk - "... would eliminate impacts on elk related to hazing and fencing and would allow for the free-range population to expand across the planning area." [And would not call for the lethal removal of any elk.] • Air Quality - "... would phase out ranching, ending ranching-related emissions of criteria pollutants." Therefore, not only is Alternative F aligned with the 1960-1970 Legislation, but it is the ethical and responsible step to take based on the global climate crisis and well as the appropriate utilization of tax payers money.

It is requested the NPS update the DEIS to include rationale and justification of each Alternative, including rationale why the NPS supports Alternative B. The updates to the DEIS should involve appropriate committee members to ensure a balanced representation of Alternatives, as 5 of the 6 Alternatives are clearly pro-ranching. The updated DEIS will need to be released for public review and comment. In summary, I support Alternative F as it aligns with the prior legislation that was agreed upon by the ranching and dairy farming families who financially benefited from the purchase of the land years past. Alternative F will help address a global climate crisis, as PRNS would return to a natural, and healthy landscape to be enjoyed by people of all ages, including our native wildlife.

Sincerely, Kelli Petersen

#7351

Name: Cushing, Svava

Correspondence: This is so wrong! Dont do it

#7352

Name: Prabandham, Manu

Correspondence: Hi, I am Manu Prabandham, a student at the College Preparatory School in Oakland. As it is for many other young people, Pt. Reyes is a special place for me. From family picnics on Limantour Beach to a more intense wilderness experience in the Phillip Burton Wilderness, I've fallen in love with Pt. Reyes, a well-preserved Marin Coastal environment. I have utmost faith in the National Park Service to continue to protect the Pt. Reyes Seashore for generations to come. However, I'm not sure if ranching should be a part of this future. It certainly wasn't a part of Pt. Reyes's past, before Spanish colonization. Elk herds roamed, and Native Americans used land sustainably without harming waterways and soils.

I prefer Alternative D as a plan going forward compared to the currently favored Alternative B and Alternative A. Although the ranchers are doing their best to prevent environmental impact on the ecosystem within the ranching zone, I believe their impact will always be too significant for the park to continue allowing ranching in the long-term. Alternative D is a good compromise similar to what the park has been doing over the last few decades. Ranches once occupied a far larger portion of the Pt. Reyes Peninsula, but much of the land has been bought back by the park. Ranching still continues, but in a smaller scale than before. Alternative D would continue this trend, opening up more land for the park to restore and protect (as it has with many other former ranches), while protecting ranchers and their livelihoods for at least the next 20-30 years.

The Environmental Impact Statement states that Alternative D would decrease emissions associated with ranching in the area by 8.05% year-on-year. While this doesn't seem like much, any restoration of pollution to its original state is beneficial. Alternative D is the first step in a gradual reduction of pollution in the region as ranching is phased out. The Federated Tribe of Graton Rancheria, an underrepresented group in the wilderness conversation, prefers that the land be returned to its original state. The Native Americans of the area, through living on and with the land for millenia, developed land-management strategies which conserved resources. Ranching interferes with traditional land-management. In essence, the true tradition of the land is the Native American way of periodical burning, not the "tradition" of ranching.

Dewey Livingston spoke to me about the influence of climate change on park lands. He talked about the land, especially the grasses, of the region becoming less suitable for ranching. The warming climate reduces the number of foggy days long-term, he said. We have to work to preserve the state of the land we have. Instead of continuing intensive ranching on land already burdened by climate change, we have to protect what we have, and the gradual shrinkage of the Ranching Zone, initiated by Alternative D, will start this process. Offering too many concessions to the ranchers threatens the landscape even further. But we have to take into account the rancher's perspective as well. They've been living on this land for decades, and it's important to take into account their livelihood as well. However, Point Reyes is a National Seashore, owned by the public as a whole, not just the ranchers. One original mission of the park was to protect the area from suburban development. Now, with increasing urbanization, it's the park's responsibility to protect the land for a new generation of people further separated from the wild.

#7353

Name: Rambo, Vicki

Correspondence: Point Reyes National Seashore is for wildlife and deserves restoration and protection. The "agricultural" leases and permits need to end at this location.

Numerous conservation groups, including Western Watersheds Project, Resource Renewal Institute, For Elk, Conservation Congress, Wilderness Watch, Sequoia Forest Keeper, White Shark Video/Shame of Point Reyes, John Muir Project, and Ban Single Use Plastics, as well as many concerned former National Park Service employees and individuals, are opposing the Park's current preferred alternative, which would extend Ranchers' lease-permits for decades is not the best choice for this national park.

Barbara Moritsch, ecologist, author, and former botanist for the National Park Service at Point Reyes National Seashore, makes the point "The ranches were purchased by the government and the ranchers were given more than adequate time to move elsewhere. The National Park Service now has an unprecedented opportunity to end ranching on our public lands in this parks-doing anything else would be a grave disservice to the American people,



as well as to the incredible diversity of native plants and wildlife that actually belong on these lands." Grazing has adverse impacts on coastal prairie, riparian systems, springs, wetlands, and coastal dune vegetation.

The national seashore has been degraded by ceaseless cattle grazing since this national park was established nearly 60 years ago and a grand opportunity presents says Laura Cunningham, California Director of Western Watersheds Project. "This could be the Yellowstone of the Pacific Coast with elk and wildlife roaming freely, instead of more beef and dairy cattle."

In contrast to the herds of cattle, there are only 124 free-roaming native tule elk in the Drake's Beach herd. "It's shocking to me that the park would kill or remove elk, for cows, or pigs, or chicken, or special interest profiteers on national park land.

Conservation values must be placed first. The proposed General Management Plan amendment being analyzed fails to protect and restore Point Reyes National Seashore AND Golden Gate National Recreation Area.

The 1916 Organic Act that formed the National Park Service mandated that natural resources on park lands shall not be impaired. The Point Reyes National Seashore legislation specifically mandates that this special coastline be "protected" and "restored."

It is my understanding that it is the job of the National Park Service to protect the National Seashore for the benefit of wildlife and the natural ecology.

#7354

Name: Harris, Roger

Correspondence: September 23, 2019

Superintendent Cecily Muldoon Point Reyes National Seashore 1 Bear Valley Road Point Reyes Station, CA 94956

Subject: Review Comments on the Point Reyes National Seashore General Management Plan Amendment - Draft Environmental Impact Statement

Dear Superintendent Muldoon:

Thank you for this opportunity to provide comments on the Draft Environmental Impact Statement (DEIS) for the Point Reyes National Seashore and Golden Gate National Recreation Area North District (PRNS/GGNRA) General Management Plan Amendment (GMPA). I am a wildlife biologist with over 30 years of professional experience in Marin County.

Mandates

NPS is constituted to primarily to protect the natural resources, according to the following statutes: • The 1916 NPS Organic Act mandates that the Secretary "shall promote and regulate the use of the National Park System by means and measures that conform to the fundamental purpose of the System units, which purpose is to conserve the scenery, natural and historic objects, and wildlife in the System units and to provide for the enjoyment of the scenery, natural and historic objects, and wildlife in such manner and by such means as will leave them unimpaired for the enjoyment of future generations." In regard to this mandate, the Ninth Circuit Court of Appeals has held that the language quoted above means that "resource protection [is] the overarching concern' in the management of national park system units." • The PRNS legislation provides for administration of the public land "without impairment of its natural values, in a manner which provides for such recreational, educational, historic preservation, interpretation, and scientific research opportunities as are consistent with . . . the maximum protection, restoration, and preservation of the natural environment within the area." • The GGNRA legislation

provides as follows: “In order to preserve for public use and enjoyment certain areas of Marin and San Francisco Counties, California, possessing outstanding natural, historic, scenic, and recreational values, and in order to provide for the maintenance of needed recreational open space necessary to urban environment and planning, the Golden Gate National Recreation Area... hereby established. In the management of the recreation area, the Secretary ... shall utilize the resources in a manner which will provide for recreation and educational opportunities consistent with sound principles of land use planning and management. In carrying out the provisions of this subchapter, the Secretary shall preserve the recreation area, as far as possible, in its natural setting, and protect it from development and uses which would destroy the scenic beauty and natural character of the area.” The DEIS documents that all ranching alternatives will have unmitigated detrimental impacts - particularly cumulative effects - - to natural lands and conflict with the above mandates.

#### NPS's Preferred Alternative (Alternative B) Contrary to NPS Mandates

I most concerned that this alternative prioritizes the economic viability of private agricultural enterprises on the public land over the NPS's mission to preserve “unimpaired the natural and cultural resources and values of the National Park System for the enjoyment, education, and inspiration of this and future generations.”

By, in effect, assuming a responsibility of maintaining the economic profitability of the ranching operations, the NPS will find itself in conflict with its own mandates. The term “sustainability” in practice entails a commitment to maintain profitability, which is out of the acceptable scope of NPS mandates.

Of particular concern are conflicts between agricultural operations and natural land values:

- Carbon sequestration results in increased soil fertility which in turn encourages invasive exotic plants replacing native flora.
- Farm operations inadvertently encourage expanding populations of American crows and common ravens, which predate on native fauna including the federally listed snowy plover. This spring the first instance of a raven taking baby pileated woodpeckers from a nest cavity was photo documented on the PRNS.
- Native coyotes and mountain lions naturally take domestic livestock, generating practices by either the NPS or the ranchers to control these native species. Coyote populations had been drastically reduced in Marin County in the past by lethal means. It can be anticipated that coyote populations on the PRNS and GGNRA will continue to increase and so will conflicts with ranching. A similar pattern may be the case with mountain lions as their populations naturally increase.
- Due to past ranching practices, California ground squirrels have been largely exterminated in the current ranchland. But it is likely that over the 20-year initial lease period, these range rodents will return. The ground squirrels will likely be even greater competition for range forage than the tule elk. In addition, the ground squirrel burrows are perceived as a hazard for cattle and horses. In short, the NPS will find itself in the position of having to control for yet another native species given the precedent established by the control of the elk. Ground squirrels are a native species and provide valuable ecosystem functions such as supplying burrows for burrowing owls and other native wildlife and recirculating soil compacted by cattle and other introduced livestock.
- The ranches will have outdoor domestic cats. It is now well documented that outdoor cats take a heavy toll on native rodents, reptiles, and birds.
- The ranches may have unleashed dogs, either as working animals or as pets, which is contrary to NPS policy. For all of the above, the DEIS does not provide adequate mitigation measures. Further, the NPS does not have adequate enforcement mechanisms even where the mitigation measures are in place. The DEIS should conclude that for all of the above impacts, the mitigation fails to achieve full mitigation. That is, Alternative B is partly unmitigated.

#### NPS's Other Ranching Alternatives (Alternatives A, C, D, and E) Contrary to NPS Mandates

While I recognize that the NPS has a mandate to preserve the historical heritage of ranching on the public land, the DEIS fails to demonstrate why that necessitates a change in the policy of the PRNS from temporary leases that would could expire and not be renewed to having commercial ranching in the entirety of the pastoral zone in perpetuity.

For instance, the NPS administers Civil War battlegrounds, but does not insist that part of the visitor experience include being subjected to live ammunition. This is, of course, an extreme example. But the DEIS does not

adequately examine and provide alternatives to active agriculture that would still conserve historical cultural values.

In a recent letter to the Marin Independent Journal, Elizabeth E. Dodge commented: “Even in cases when a ranch’s lease is relinquished, the National Park Service offers it to other ranchers rather than either retire it or, if we are to be historically sincere, return it to the Coast Miwok people who were driven off the land by the ancestors of those who currently occupy it.”

#### Alternative F Achieves Resource Protection

Alternative F most closely achieves an environmentally superior desired outcome of allowing ranching to expire. The DEIS provides sufficient evidence that continued ranching as proposed in Alternatives A-E result in unmitigated detrimental environmental effects on soils, water quality, air quality, vegetation, wildlife, and other natural resources. These alternatives are not consistent with the NPS’s statutes.

The DEIS’s proposed policy for ranch succession should be modified to allow ranching operations to expire on a given ranch if a named lessee does not wish to enter into a lease/permit. Likewise, if a current lessee consistently fails to meet performance standards, the lease should be terminated. No other effort should be made to seek leases from insider or outside the park. An alternative allowing ranching to attrite over time is the most in keeping with the NPS’s natural resource protection mandate.

#### Conclusions

- The NEPA document is insufficient in failing to fully explore restoration of public lands from the impacts of ranching. This should be more fully developed.
- The discussion of the NPS’s monitoring and enforcement program is insufficient and needs to be expanded. In particular, the issue of insufficiently funded and unfunded programs should be considered the same as having no program at all.
- The cumulative impact analysis is incomplete and insufficient to explain the overall impacts of grazing compared to benefits of the removing it.
- The DEIS does not clearly link the impact assessment with specific mitigation measures. This needs to be done. Unless BMPs and other mitigation measures are required and specifically linked to impacts, they are really intentions and not concrete mitigation.

If the NPS would recirculate a supplemental DEIS for public comment, the source of funds to fully implement the alternatives and the effects of any reduction in funding on any other existing programs should be described. The FEIS should assume no increase in overall funding to pay for the implementation of the selected alternative, because funding has been declining.

Respectfully,

Roger D. Harris, Certified Wildlife Biologist

#7355

Name: Wargowski, Deanna

Correspondence: Please do not kill the tule elk! National Parks should be supporting native wildlife - not the proliferation of animals for slaughter. These animals are horrible for our natural environment and have no place in our parks. Please keep our parks wild.

#7356

Name: Heimberg, Erica

Correspondence: To Whom it May Concern,

I am extremely concerned with Alternatives A-E outlined in the proposed General Management Plan Amendment. I have worked to protect national parkland throughout my career as a nonprofit funding development professional with the Golden Gate National Parks Conservancy, Turtle Island Restoration Network and other environmental organizations in Marin County. I am also an outdoor enthusiast and visit the Point Reyes National Seashore regularly to enjoy the remaining natural ecosystems and view wildlife.

The National Park Service mission is to "preserve 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."

Allowing ranching to continue or to expand within the park is counter to this mission in three key ways:

1) Ranching impacts wildlife habitat, increases erosion, fouls water and increases greenhouse gas emissions. While the EIS notes these impacts, the preferred alternative would allow them to increase. No estimate of the costs to mitigate or restore these ecosystem services are included. North America has lost 3 billion birds since 1970 due to habitat loss. 86% of land mammals are now livestock or humans. The impacts on elk are outlined, but no other species impacts are detailed. As we lose species, the web of life is fraying. What are the costs to mitigate these impacts, which would be allowed in conflict with the NPS mission? How will those mitigations be funded in order to protect the parkland.

2) Dairy and beef consumption are leading causes of climate change. With the UN IPCC October 2018 report stated that we have less than 12 years to avert the worst impacts of climate change. Marin County has committed to "Drawdown Marin" which includes best practices to reduce carbon, including reducing meat and dairy consumption. Livestock accounts for 14.5% of greenhouse gas emissions worldwide. Grassfed beef is not significantly better for the environment, and the benefits of rotational grazing have been debunked. How will the National Park Service mitigate the continued or increased greenhouse gasses produced by options A-E?

3) The diminished impact on the enjoyment of national parkland by people who don't eat meat or dairy of viewing these activities. I personally have viewed separated plastic crates with tiny outdoor yards used to separate calves from dairy cattle. I have seen cows with painfully swollen udders covered in mud and excrement. I have seen eroded pathways where mud and excrement are flowing into water ways and estuaries. I was extremely disturbed to realize that my tax dollars are subsidizing these activities on parklands. Many US citizens do not eat meat or dairy due to religious reasons. We all have a right to visit our national parks and not view harmful, cruel activities.

Do not use my tax dollars or anyone else's to subsidize the ranchers further through allowing succession or additional agricultural activities.

I do support funding to help the ranching families develop alternative ways to make a living. Have potential training opportunities in alternative livelihoods in the community been developed?

I urge the National Park Service to select option F and end ranching in the Point Reyes National Seashore. The science in the EIS does not support continued ranching within the mission of the National Park Service.

Sincerely,

Erica Heimberg

#7357

Name: Moskowitz, Deborah

Correspondence: To: Superintendent Cicely Muldoon

Point Reyes National Seashore

Re: Comments to Point Reyes National Seashore GMPA/EIS

I have lived in the Bay Area most of my 64 years, and in Marin County for over 20 years. As a frequent visitor Pt. Reyes National Seashore partaking of its many recreational opportunities to hike, bike, camp and kayak, I feel blessed to experience the Seashores incredible beauty and natural diversity through the seasons.

That said, I am deeply troubled by the ongoing degradation inflicted on the Seashore by pervasive dairy and beef ranching on nearly on third of the park. Inevitable encounters with cow manure and muddy pastures; rutted trails, tracked hillsides, polluted ponds, industrial-looking buildings, machinery and trash, barbwire fences and private property signs diminish the visitor experience, violate the public trust and give the impression of blatant disregard for National park values.

This ongoing occupation by ranchers flies in the face of the promise and purpose of the Seashore. Pt. Reyes is the only National Seashore on the West Coast which was envisioned as an unimpaired natural oasis in rapidly developing coastline. Located within an hours drive for millions of Bay Area residents, the establishment of the park offered an important opportunity for urban residents to connect with nature. The lands were purchased with public funds and all parties, including well-compensated ranchers, agreed that ranching would reasonably come to end. Now, sixty years later, taxpayers continue to bear the burden of detrimental ranching on 28,000 acres our National Seashore. And, when the ranchers finally depart (Alternative F), will the public have to cover the financial cost of repairs and restoration, as they did with the Oyster Farm in Drakes Estero?

My professional and educational background is in public health, so I my my comments are narrowly focused on the threat that nearly 6000 cattle pose to health and welfare of the Seashore's wildlife and visitors. It seems as though these concerns were not addressed or dismissed as unimportant by Preferred Alternative B. For instance, cattle are the single largest source of greenhouse gases in the park and thus the largest contributor to the Climate Crisis yet this impact is largely unaddressed by the EIS. The hundreds of tons of cow manure that pollute watersheds and coastal waters, harms rare coastal ecosystems that are home to over 100 endangered or threatened plant and animal species is also overlooked in B. Runoff from cattle operations also harbors bacteria, such as e-coli, that drains into water bodies where people swim, fish and cultivate oysters. Notably, signs posted at Chicken Shack beach warn swimmers of the biohazard. Wildlife, human and ecosystem health should be prioritized and protected, not trampled and poisoned by commercial cattle operations.

#### Johnes Disease

Most certainly, Johnes disease in Pt. Reyes National Seashore poses an intolerable threat to wildlife that must be eliminated. Last year the Park Service culled 20 Tule elk to test for Johnes, but simply trying to estimate infection rates in wildlife ignores the most likely source of ongoing infection-the 6,000 resident cattle. Yet, the public has little information regarding current testing requirements or results for cattle at Pt. Reyes.

Previous studies indicated that 50 percent of Pt. Reyes herds were infected, but the number could be much higher today. According to national experts at Johnes.org, Johnes disease is nearly ubiquitous in U.S. dairy cattle with an estimated true herd-level prevalence of over 90% (when accounting for herds with false-negative culture results; Lombard, Prev.Vet. Med. 108:234-238, 2013). and is also present in 18% of US beef cattle herds.

Meanwhile, MAP bacteria, which causes Johnes's disease can persist in water, silage and soil for a year or longer, infecting other animals that come into contact. Currently, dangerous ranching practices contaminate grasslands and watersheds, and expose wildlife and humans to disease. These include allowing cows to enter creeks and ponds, allowing cows to graze on hillsides that drain into streams and watersheds, overgrazing pasturelands by confined dairy herds, allowing ranchers to spread manure slurry onto grasslands and the failure by NPS to regularly monitor number of cattle and conditions on leased lands. Sheep and goats also contract and transmit Johnes,

Cattle are proven to have infected native Pt. Reyes Tule elk, the only population of Tule elk that reside within a National Park. Tragically, the Tule elk problem may be the tip of the disease-transmission iceberg. Johnes Disease

can infect a wide range of wild and domestic species including sheep, goats, deer, antelope, fox, rabbits and birds that come into contact with infectious cow manure, according to [Johnes.org](http://Johnes.org).

Should the NPS wish to eliminate Johnes disease from Pt. Reyes cattle herds, comprehensive testing and culling, along with strict calf and manure management protocols would be necessary. Without comprehensive testing, diagnosis of Johnes is difficult. Johnes is silent in the early stages-animals typically appear healthy for three or more years while shedding the infectious MAP bacteria in manure and milk. The hallmark signs of chronic diarrhea and wasting do not present until later stages. Dairy cattle are taken to slaughter once their milk production wanes, typically end up as hamburger meat before the disease becomes evident.

Prevention of the disease in cattle is even more challenging now the single vaccine, Mycopar, used by many U.S. Veterinarians and producers to prevent infection is no longer being produced.

The Hoards Dairyman article is based on this Livestock Health Alert issued by the Wisconsin Department of Agriculture Trade and Consumer Protection (DATCP).

#### Chronic Wasting Disease VS Johnes Disease MAP (paratuberculosis)

Alarming, from a public health standpoint, is the risk that the Johnes-causing bacteria, *Mycobacterium avium paratuberculosis* (MAP), may play a role in a spectrum of human diseases, most notably, Crohns Disease. Like Johnes, Crohns is a chronic and painful inflammatory disease of the intestines. Evidence linking the two diseases includes the finding that MAP bacteria are present in Crohns patients at rate of 7:1. For the dairy and beef industry, MAP is the elephant in the room since live MAP bacteria have been found in raw and even, pasteurized milk, cheese, dehydrated infant formulas and beef.

Elimination of Johnes disease from cattle should be a priority for the industry. Michael Collins, DMV, international Johnes expert at University of Wisconsin Veterinary Department and Johnes Information Center cites the following article about CWD, a cattle disease that may also threaten human health. Chronic Wasting Disease in Cervids: Implications for Prion Transmission to Humans and Other Animal Species. The authors of the article conclude: Available data indicate that the incidence of CWD in cervids is increasing and that the potential exists for transmission to humans and subsequent human disease. Given the long incubation period of prion-associated conditions, improving public health measures now to prevent human exposure to CWD prions and to further understand the potential risk to humans may reduce the likelihood of a BSE-like event in the years to come.

Dr. Collins contrasts CWD with Johnes (JD), which is a more common disease in cattle. His comparison of the two diseases underscores the relative importance of JD to society and urges science-based decisions on animal disease control investments. The evidence in the table below and the references that follow illustrate the highlight the relative risks to humans.

#### Contrasting Two Wasting Diseases

CWD MAP (Johnes's Disease causing bacteria)

RARE and only found in cervids primarily in Common-90% of US Dairy herds  
North America

Limited transmissibility to nonhuman Documented cases of naturally occurring MAP infection in non primates by experimental challenge human primates

No evidence CWD causes human disease MAP found in 50% of of people with CD

Anti-MAP antibiotics can cure CD

MAP fulfills 8/10 Hills Criteria for causality of CD

MAP linked to T1DM and other so-called autoimmune diseases

Risk factors for humans known and controllable Multiple ongoing exposure risks for humans:

MAP found alive in pasteurized milk and raw meat

#### Footnotes:

" 1 Crohns disease affects more than 1 in 800 people in North America, and while the incidence has plateaued in more industrialized countries, since 1990 the incidence has been rising in newly industrialized countries in Africa, Asia, and South America, including Brazil.

" 2 Type 1 Diabetes Mellitus affects roughly 1 in 550 youth (<20 years old) in the U.S. and Canada, and the incidence is rising.

" 3 Multiple Sclerosis affects roughly 1 in 700 in the U.S., and the incidence is rising.

To ignore the threat of Johnes disease risks the health of wildlife and potentially humans in the park. The unknown risk is whether MAP infection is also transmissible to humans via contaminated water, soil or grass (as it is to elk and other animals). The Precautionary Principle states that that unless a risk can be eliminated, it must be considered.

#### Evaluation of the Alternatives

##### Alternative A: No Action

This alternative, required by the National Environmental Policy Act, would allow ranching to continue under 5-10 year leases. The NPS would capture and move, or kill Tule elk that encroach on lands leased for cattle.

Comment: Alternative A does not address the harmful impacts of ranching including pollution and Johnes disease. It is uncertain that Tule elk that test positive for Johnes could be moved to other lands, where they may infect other herds.

##### Alternative B: NPS's preferred alternative

Issue 20-year leases; establish a "Ranchland Zone" with 3 sub-zones. This would concentrate cattle in one subzone designated for that purpose; and convert some cattle grazing land for diversification (raising pigs, goats, sheep, chickens, and row crops). B&Bs and retail farm stands would constitute another subzone. This alternative would remove (aka shoot) 10-15 Tule elk annually in order to maintain a herd of 120 elk at Drakes Bay, as well as any elk that graze on grass leased to ranchers.

Comment: Alternative B does not address/reduce/eliminate the harmful impacts of ranching, including pollution and Johnes disease. Also, allowing ranchers to diversify by raising sheep and goats would likely contribute to disease spread since these animals also acquire and transmit Johnes disease.

##### Alternative C: Lethal removal of all Drakes Bay Tule Elk

Comment: Alternative C does not address/reduce/eliminate the harmful impacts of ranching, including pollution and Johnes disease and would likely contribute to disease spread through diversification with sheep and goats.

It is unconscionable that rare Tule elk would be extirpated from their native habitat in favor of livestock.

##### Alternative D: Reduced ranching

Same as B; would grant 20-year leases and phase out those ranches with minimal infrastructure on 7,500 acres over one year.

Comment: Alternative D does not address/reduce/eliminate the harmful impacts of ranching, including pollution and Johnes disease and would likely contribute to disease spread through diversification with sheep and goats.

##### Alternative E: Phase out dairy ranches

Dairy farms have more impacts to the park than beef ranches. The six dairy farms would be phased out over 5 years and allowed to convert to beef ranching, eligible for 20-year leases. The Drakes Bay elk herd would be managed at a threshold population of 120.

Comment: Alternative E would reduce but not eliminate the harmful impacts of ranching, including pollution and Johnes disease and would likely contribute to disease spread through diversification with sheep and goats.

Alternative F: No ranching.

Under Alternative F, land dedicated to ranching would be repurposed for "visitor opportunities. The Tule elk would be allowed to expand their range in the park.

Comment: I support Alternative F, the only that option that would finally accomplish the intended purpose of the park and can restore the Seashore to a healthy environment for wildlife and people.

Thank you for the opportunity to provide comments.

Sincerely,  
Deborah Moskowitz, MPH

#7358

Name: Sweeney, John

Correspondence: I am encouraged by NPS' ongoing evaluation of expanding cycling opportunities in the Point Reyes area. Though I currently restrict my cycling visits there out of concern for safety, increased connectivity through the use of existing ranch roads would be most welcome and greatly increase my visitation to this gem of the GGNRA. Specific connections I would like to see are as follows:

Marshall Beach Trailhead to Pierce Pt. Rd. via existing ranch roads; Abbotts Lagoon to Drakes Estero via existing ranch roads; Platform Bridge to Devil's Gulch via existing ranch roads; Bolinas Ridge at Olema Hill to Point Reyes Station via existing ranch roads; Bolinas Ridge to Five Brooks via existing ranch roads; and an Estero Trail loop using existing ranch roads.

Thanks for your consideration! John C. Sweeney

#7359

Name: N/A, N/A

Correspondence: Dear Point Reyes National Seashore Superintendent,

Marin County Farm Bureau appreciates the time and effort that has gone into researching all options for the draft EIS. Marin County Farm Bureau (MCFB) is a grassroots, voluntary membership-based organization whose purpose is to represent the interest of agriculture in Marin County. MCFB works to secure the future of agriculture and aims to find solutions to the problems of the farm and rural community. Farm Bureau strives to protect and improve the ability of farmers and ranchers engaged in production agriculture to sustainably and viably provide a reliable supply of food. MCFB is affiliated with the California Farm Bureau Federation; MCFB supports the September 23, 2019 California Farm Bureau Federation comment submitted.

Please select the preferred alternative, "Alternative B" for the future of ranching in the Point Reyes National Seashore. MCFB supports agriculture in the Seashore because it is a vital part of the region's history, culture, and current economy.

Marin County Farm Bureau appreciates the time and effort that has gone into researching all options for the draft EIS. Twenty year leases, succession planning, and diversification allowances enable the farms and ranches to sustainably adapt to changes facing their family farms and allows the next generation the opportunity to contribute to the local food shed. However, diversification seems limited in scope and size, 2.5 acres around structures in ranch core with no irrigation and other restrictions is cumbersome. In addition, the draft EIS would



have been more complete if research was done on an option that includes an Elk Fence between the agriculture and wilderness area or Elk relocation options. Agriculture is a partner in natural resource conservation and preserving open spaces. Many of the natural landscapes in the US near large urban areas are preserved because agriculture was there first to curb development. Agriculture and nature do co-exist, we support the farmers and ranchers in the Seashore for their part in providing for the local food shed in a sustainable way. Agriculture plays an important role in combating Climate Change by providing local food and carbon and greenhouse gas drawdown.

Agriculture, and the continuation of workable farming in the Seashore, is important to Marin County Farm Bureau because it is a cornerstone in West Marin's history, economy, culture, resource conservation, and carbon drawdown. In its mission statement, the National Park Service's goal is to preserve unimpaired the natural and cultural resources and values of the National Park System for the enjoyment, education, and inspiration of this and future generations. Agriculture in the Seashore is a part of the history that led to its creation and has been a part of the working landscape that has existed since inception of the Point Reyes National Seashore. Historic preservation and cultural landscapes are priorities for the National Park Service. Farms and ranches in the Seashore are part of these cultural landscapes and are important to preserve, viably, for this and future generations.

Agriculture is important to me in the Point Reyes National Seashore, the preferred Alternative B is the best option from the draft EIS for reasons stated above. Please consider the changes above and those mentioned in the California Farm Bureau Federation's September 23, 2019 comment in the final EIS and GMPA. Thank you for taking the time to review these comments.

Respectfully Submitted, Brian Dolcini President, Marin County Farm Bureau

#7360

Name: Beeny, Diane

Correspondence: I am entirely opposed to the killing of elk at Point Reyes...

It is THEIR habitat and they have EVERY RIGHT to be there!!

They are an important part of the eco-system and should be left alone!!!

RESPECT wildlife - DON'T kill it!!!

Do you think tourists will want to come there to see an empty desolate wasteland??!

Please leave the elk and other wild creatures ALONE!!!!

Thank you.

#7361

Name: CATALDO, BETH

Correspondence: To Whom It May Concern,

I am writing to support Alternative F of the General Management Plan Amendment Draft Environmental Impact Statement. I do this in the spirit of Theodore Roosevelt, who said:

"The 'greatest good for the greatest number' applies to the number within the womb of time, compared to which those now alive form but an insignificant fraction. Our duty to the whole, including the unborn generations, bids us restrain an unprincipled present-day minority from wasting the heritage of these unborn generations. The

movement for the conservation of wildlife and the larger movement for the conservation of all our natural resources are essentially democratic in spirit, purpose, and method."

My experience as a volunteer in two capacities at Point Reyes National Seashore has provided me with insight into the detrimental short- and long-term effects that the ranches have on our public lands and oceans. I will describe what I have seen during more than 500 visits to Point Reyes over the last 20 years.

Winter Wildlife Experience: I have been a Winter Wildlife volunteer for the past 10 seasons, spending time from January until April each year talking to visitors about elephant seals, whales and other wildlife that visit the park. During this time, I have seen raw sewage from the cattle flow directly into the ocean at Drakes Beach.

One time in particular stands out, this year (2019) after a heavy rain. I was talking to visitors at the north end of the beach and we were discussing the strong smell of cow manure when we looked down at the stream, which runs into the ocean here, and saw the brown sewage, which was emanating the stench. This continued all day as we watched the ocean turn brown.

There aren't any signs alerting the public of this sewage. Children and adults walk through and play in this stream. I have also seen wildlife, including elephant seals, river otters and migrating birds, using this waterway.

I took a video that day so that I could have evidence of what was going on.

When I alerted the park staff via email about the pollution and stench, they wrote me back, stating that: "Facilities looked at the pipe for the Drakes VC sewage system and did not detect any leaks. Range staff checked from the parking lot upstream to the pond for signs/scents of manure - didn't detect anything unusual. I also talked to the ranch operator and it sounds like they were spreading manure on the flat areas of the D Ranch field along Drakes Beach Road during that time, so that may have been the source of the smell."

This tells me that the ranch's everyday operations cause pollution in our oceans. There is nothing that the Park can do to mitigate this. The employees could only shrug since the Park Service allows dairy ranches to spread liquid cattle manure on grasslands throughout the park.

Beach Watch Experience: For more than 15 years, I have walked the Great Beach (North Beach to Abbotts Lagoon) each month for the Beach Watch program, counting the live and dead animals on the beach and in the water. This information from this program adds to a database of information NOAA uses to assess ocean and beach health.

During this time, I have seen Abbotts Lagoon turn brown, clearly from the runoff of the cattle. This area also lacks signage about the possible pollution for those who are fishing and playing in this area.

Many birds - both migratory and residential - and mammals find their food in Abbotts Lagoon. I can't help but wonder what eating fish from this area with these levels of pollutants do to them.

Before I wrote this feedback, I wanted to make sure that I wasn't exaggerating my experiences. I researched to see if anyone had tested the water there and found a report (the link is below).

The data referenced in the report, which was collected throughout the country, show that "The livestock-polluted waters of Point Reyes National Seashore rank in the top 10 percent of U.S. locations most contaminated by feces indicated by E. coli bacteria."

The report also discloses that "Point Reyes National Seashore has been one of the 10 most feces-contaminated locations monitored in California since 2012 and that the state's highest reported E. coli level was on a Point Reyes cattle ranch."

The report goes on to state that "The Park Service's assessment determined that dairies pollute the Drakes Estero, Limantour, Kehoe and Abbotts Lagoon areas with high concentrations of fecal coliform. Other studies show that cattle ranches are one of the major contributors of fecal coliform and E. coli to Tomales Bay."

This report and references to the data can be found online: <https://therevelator.org/wasted-water-crappiest-places/>

Given these findings, I find it hard to understand why the National Park Service recommends continuing and extending ranching in this beautiful area that future generations of humans and animals would like to enjoy. Let's be clear: the e. coli from the cattle are affecting the public enjoyment and use of Point Reyes National Seashore. I witnessed this firsthand.

The National Park Service is supposed to manage these public lands for "the greatest good for the greatest number." With the many challenges this country faces in light of the changes in climate, protection of natural resources should be our priority out of respect for future generations.

Politicians of diverging opinions come together on the importance of our parks.

George W. Bush stated: "Our National Parks belong to each of us, and they are natural places to learn, exercise, volunteer, spend time with family and friends, and enjoy the magnificent beauty of our great land."

President Roosevelt said: "There is nothing so American as our national parks.... The fundamental idea behind the parks...is that the country belongs to the people, that it is in process of making for the enrichment of the lives of all of us."

I am in full support of honoring the original spirit of our national parks. The best solution would be to: • Phase out ranches • Remove commercial livestock • Prioritizes wildlife over cattle • Restore wildlife habitat to native plants

Alternative F is the only option for the future of Point Reyes National Seashore.

Beth Cataldo

#7362

Name: Price, Bart

Correspondence: I'm writing to support the public access and bicycling improvements outlined under Alternatives B, C, D, E, and F. I strongly support proposals that would lead to the planning and implementation of bicycling routes on trails, ranch roads, and pathways throughout the planning area, including but not limited to: 1) a connection between Devil's Gulch and Platform Bridge Road using existing ranch roads, 2) a connection between Bolinas Ridge Trail at Olema Hill and Point Reyes Station to serve as an interim connection for the Cross Marin Trail, 3) a connection between Bolinas Ridge Trail and Five Brooks Stables using existing ranch roads 4) a connection between Drakes Estero and Abbotts Lagoon Trail using existing ranch roads, 5) a connection between Marshall Beach Trailhead and Pierce Point Road using existing ranch roads, and 6) an Estero Trail loop using existing ranch roads. I encourage NPS to collaborate with ranchers and other stakeholders to educate the public and address concerns related to public access on working ranch lands.

The improvements outlined above would enable and encourage me to visit the Seashore more regularly-and by bike, rather than car. I would feel much safer riding in the Seashore and surrounding areas on trails, pathways, and ranch roads, rather than on roads shared with fast-moving vehicular traffic. Bicycling opportunities are currently very limited and fragmented, so any improvements in connectivity and the creation of new loop options would enable me to enjoy more of the Seashore and surrounding areas by bike.

#7363

Name: Heagerty, Elise

Correspondence: I remember when the GGNRA was formed. I am a long term resident of Marin County. Also have been involved with the equestrian community for over 45 years in Marin. It has been punishing at best attempting to work with the Park Service in meeting expensive and very limiting goals in terms of horses, their environment, etc.. So I am shocked and saddened by what appears to be a cozy relationship with ranchers and the Park Service which seems to favor ranchers with growth and seems to by-pass community, environmentalists, and puts in place contracts long term. To think that the Tule Elk could be hunted to ensure that cattle, now chickens, etc., and B&Bs could be introduced into this amazing territory. We know what the impact has been on water. When I go out to Pt Reyes I am always in awe of the beauty and, of course, the Tule Elk. We all love Pt Reyes so please open up this decision making proces to time and data from the community. Elie Heagerty

#7364

Name: adams, robert

Correspondence: As a member of the California-based international animal protection nonprofit organization In Defense of Animals with over 250,000 supporters, I oppose the National Park Service plan to kill native Tule elk, grow commercial crops, and permit ranchers to add chickens, turkeys, sheep, pigs, and goats to their exploitative operations. For this reason, I support Alternative F.

As national park land, this property was specifically set aside to protect, restore, and preserve the natural environment including the wild animals who live there. The original intention was to phase out dairy and cattle ranching, not add more crops or animals to increase ranching profits.

The proposed plan does not address the damage from grazing, including water-quality degradation and soil erosion. Also, adding new crops will create more conflicts with native wild animals.

Please abandon this inhumane and destructive plan by selecting Alternative F. I urge you to restore the Seashore's Pastoral Zone for wild animal habitat and repurpose historic ranch buildings for scientific research, interpretation, and public education.

#7365

Name: N/A, N/A

Correspondence: I believe that ranching must come to a natural end in point Reyes national seashore. Ranching has a history that predates the park, but this does not mean that it should exist in the park in perpetuity. Indeed, this is why the leases were limited in duration from conception of the park. ranchers should not be permitted to expand their operations and reap commercial benefit using the land supported by taxpayer dollars. Further, ranchers argue that the rule elk are competing with cattle for their land and destroying fences etc. the elk seek to roam and forage. They should be permitted to do so.

#7366

Name: Kunkle, Rob

Correspondence: I think we need to get these cattle out of our national parks. They don't belong there and are harmful to the environment. We should allow the Tule Elk that space.

Thank you

#7367

Name: Lauer, Margaret

Correspondence: I respectfully submit my comments on the draft Environmental Impact Statement to guide the NPS Point Reyes National Seashore management plan.

#### Alternatives A-E

The essential message in the EIS is that the land, water, and wildlife inside the boundaries of the Pt. Reyes National Seashore would benefit if the two dozen or so ranches were to stop operations. Only one of the alternatives of the EIS addresses the issue of ending ranching in the PRNS over a 5-year period, Alternative F. This is not new. It was the agreement made through compromise back in 1975, to phase out private ranching on Point Reyes parklands within 25 years or with the death or retirement of those ranchers who took part in the plan, signed it, and were rightly and well compensated.

The NPS should adhere to the goals it set out for all of the parks it manages, including the Pt. Reyes National Seashore, which includes protecting the park for the benefit of the natural environment and its wildlife, and for public enjoyment. The friction inherent between these two missions has been real since the agency was established and yet there have been many successes in mitigation over its long history. Yet, in none of Alternatives A-E is there an alternative offered for avoiding wildlife conflicts other than terminating the "excess" elk. These elk were returned to that environment in 1978 in order to thrive. Yet, the ranchers' benefits have been considered above the elks, and all others.

As a member of a multi-sector committee in Marin in 1987 reviewing how soils were managed on all public land in the County, the worst degradation I saw by far was in the Pt. Reyes National Seashore. We saw that it was due to cattle grazing on the alluvial soils and the hillsides, exacerbated by the wind and fog. Thirty years later, it is still happening. And now there is the added issue of the effects of climate change, including sea rise.

#### National Park Service Climate Plan

The preferred Alternative B and all others except F are counter to the goals and actions of the NPS climate plan, and that of Marin County and the state.

I applaud the work on the NPS climate action plan, and its Climate Friendly Parks Program. This is expensive. The NPS literally cannot afford to continue to support grazing in the PRNS or any parks while also "assisting parks in developing strategies and specific actions to address sustainability challenges, reduce GHG emissions, and anticipate the impacts of climate change on park resources." Methane, a GHG produced by cattle is at least 25x worse than carbon dioxide. There is no mention of mitigating the cattle's impacts in the Alternatives.

PRNS is one of the few undeveloped seashores in the US. Due to the effects of climate change including sea rise, the protection of the waters, land, air, and wildlife is the priority of the NPS for PRNS. Alternative F is the best and ultimately the only choice for the NPS.

#7368

Name: N/A, N/A

Correspondence: Dear Point Reyes National Seashore Superintendent,

The Sonoma-Marín Cattlemen's Association thanks the National Park Service for the opportunity to comment on the draft EIS. The Sonoma-Marín Cattlemen's Association (SMCA) is affiliated with California Cattlemen's Association and the National Cattlemen's Beef Association and supports the comments that these groups submitted to the National Park Service regarding the Point Reyes National Seashore on September 23, 2019. The Sonoma-Marín Cattlemen's Association is a local, grassroots organization comprised of ranchers in Sonoma and Marin Counties.

Sonoma-Marin Cattlemen find Alternative B to be the best option in the draft EIS. Twenty-year leases, succession planning, and diversification are factors that will enable ranchers to be sustainable and viable. The producers in the park are a significant part of ranching in Marin County and contribute to the critical mass that supports local agricultural infrastructure and economy. The draft EIS would have been more complete if research was done on an option that includes an Elk Fence between the agriculture and wilderness area or Elk relocation options.

Agriculture and wildlife can and do co-exist. Agriculture inherently conserves natural resources and preserves natural landscapes and vistas. Sonoma-Marin Cattlemen support the farmers and ranchers in the Seashore for their part in providing for the local food shed in a sustainable way. Agriculture plays an important role in combating Climate Change by providing local food and carbon and greenhouse gas drawdown. Livestock grazing is an essential land management tool that is a cost effective tool for wildfire prevention and is a win for the environment. Grazing livestock captures carbon and increased the rate of sequestration, and grazing drives rural economic development and local food sources.

Thank you for taking the time to review these comments. Sonoma-Marin Cattlemen's Association supports the comments submitted by California Cattlemen's Association and the National Cattlemen's Beef Association. Sonoma-Marin Cattlemen's Association favors Alternative B and the changes mentioned above for the final EIS/GMPA.

Respectfully Submitted, Michael Furlong President Sonoma-Marin Cattlemen's Association

#7369

Name: Mulvey, Debra

Correspondence: Take the cattle off our public lands!

#7370

Name: Mason, R

Correspondence: I'm writing to support the public access and bicycling improvements outlined under Alternatives B, C, D, E, and F. I strongly support proposals that would lead to the planning and implementation of bicycling routes on trails, ranch roads, and pathways throughout the planning area, including but not limited to: 1) a connection between Devil's Gulch and Platform Bridge Road using existing ranch roads, 2) a connection between Bolinas Ridge Trail at Olema Hill and Point Reyes Station to serve as an interim connection for the Cross Marin Trail, 3) a connection between Bolinas Ridge Trail and Five Brooks Stables using existing ranch roads 4) a connection between Drakes Estero and Abbotts Lagoon Trail using existing ranch roads, 5) a connection between Marshall Beach Trailhead and Pierce Point Road using existing ranch roads, and 6) an Estero Trail loop using existing ranch roads. I encourage NPS to collaborate with ranchers and other stakeholders to educate the public and address concerns related to public access on working ranch lands.

The improvements outlined above would enable and encourage me to visit the Seashore more regularly-and by bike, rather than car. I would feel much safer riding in the Seashore and surrounding areas on trails, pathways, and ranch roads, rather than on roads shared with fast-moving vehicular traffic. Bicycling opportunities are currently very limited and fragmented, so any improvements in connectivity and the creation of new loop options would enable me to enjoy more of the Seashore and surrounding areas by bike.

#7371

Name: merrill, debbie

Correspondence: Dear National Park Service,

Facts- 1. Pt Reyes National Seashore is a National Park, not private land to be used for Ranching, farming, or other domestic animal raising. Leases for Ranching were to have expired decades ago, as agreed by the Ranchers who

sold their land to be used as a National Park. 2. Current proposals of culling, expanded ranching, and row crops do not add to the National Park, only the degradation of it and it's specialty Wildlife such as the Tule Elk and Blue eyed Coyotes. 3. The visiting Public in general does not come to see veal contained along side the road, Wildlife fenced in, or hillsides covered with crops. While the Ranching history should be recognized and preserved, the days of large operations inside the Park were to be phased out, not made larger and especially at the expense of what makes this National Park so unique. 4. The Public is being robbed of this Park by special interests. I come here, as many do, to see unique Wildlife and untouched coastal lands, not cows being herded for daily milking by ATVs. 5. No for profit, private operation should be allowed to damage/control a National Park. If they are to exist within, they should be made to co-exist and be a benefit to the land. No Wildlife should die as a result of their use of the land, as will certainly happen under the current preferred proposal. What can any member of the general public say to effect change in the mission of the NPS to return this Park to the Wildlife and Public who come here to see it? You are to be the protectors of this Park. Under the current preferred proposal, this National Park will cease to be as it was meant to. If every member of the public that visited the Park was aware of what is happening, the outcry would be something that could not be ignored. I implore the NPS to stop going down this path of catering to special interests and protect this very special place for generations to come. There are few animals that will remain untouched and unaffected by the NPS preferred proposal. A Blue eyed Coyote has no price tag over a goat or cow. No cattle alive can hold a candle to the majestic sight of a Tule Elk standing on a hill with an ocean backdrop. THIS is what Pt Reyes National Seashore is and should always be. Please do not expand ranching/row crop raising. Please do not cull Elk, they have far more a right to eat the grasses than a cow for profit. Keep Pt Reyes the National Park it should be.

#7372

Name: Harrison, Norma J F

Correspondence: Adopt Alternative F the maximum protection, restoration and preservation of the natural environment within the area. Don't shoot Point Reyes Tule Elk. <https://restoreptreyesseashore.org> a best friend told me of this effort.

#7373

Name: Locke, Janet

Correspondence: I absolutely do not want our wonderful Tule elk slaughtered so ranchers can use our national park to graze their cattle. Cattle are destructive to the environment because their heavy weight and destructive hooves tear up the soil and the gas they pass contributes more to greenhouse gases than automobile emissions. To have Tule elk who were once thought extinct exterminated is a horrible idea. I love seeing wild animals in National Parks, and I hate the idea of letting cattle graze in our national treasures.

#7374

Name: Lee, Anthony

Correspondence: I currently hike and run at Pt. Reyes national park. I would love to mountain bike there as well but the number of trails available for biking on are very limited. It would be great if more trails and dirt roads were accessible, particularly as loops.

Thank you, Tony

#7375

Name: Thorvaldsdottir , Asgerdur

Correspondence: Writing in opposition to any plans to sacrifice wildlife (Elk) for cattle ranching in Marin County. For the health of the environment, and the natural ecosystem, not to mention human health (which will not benefit more consumption of animal products), please protect the elk population at Point Reyes.

#7376

Name: Axelrod, Lynn

Correspondence: I'm in favor of doing all possible to maintain healthy elk populations in Point Reyes Ntl Seashore. The return of an elk population in Coastal West Marin, where they historically existed, is an ecological success story. They are historic, indigenous.

"Tule elk, the smallest of the four surviving elk subspecies in North America (compared to Roosevelt elk, Rocky Mountain elk, and Manitoba elk), are endemic to California. A dominant grazer wherever they set foot, tule elk once numbered 500,000 across the coastal regions and inland basins of California, with a thousand alone on the Point Reyes Peninsula. [...]" This is from Bay Nature Magazine, which I'm citing for the information about their history: <https://baynature.org/article/on-the-fence/>. I'm also citing to the Center for Biological Diversity: [https://www.biologicaldiversity.org/campaigns/protecting\\_Point\\_Reyes\\_elk/pdfs/TuleElkBrochure.pdf](https://www.biologicaldiversity.org/campaigns/protecting_Point_Reyes_elk/pdfs/TuleElkBrochure.pdf)

The Park Service is obligated to maintain the elk, per the Tule Elk Preservation Act (16 USC 673d) - - P.L. 94-389, approved August 14, 1976, (90 Stat. 1189).

#7377

Name: Burger, Richard

Correspondence: I would like to add encourage all of the ideas listed under Alternatives B, C, D, E, and F. I especially like the alternatives that allow for bicycling on trails, ranch roads, and paths in the area, including but not limited to: 1) a connection between Devil's Gulch and Platform Bridge Road using existing ranch roads, 2) a connection between Bolinas Ridge Trail at Olema Hill and Point Reyes Station to serve as an interim connection for the Cross Marin Trail, 3) a connection between Bolinas Ridge Trail and Five Brooks Stables using existing ranch roads 4) a connection between Drakes Estero and Abbotts Lagoon Trail using existing ranch roads, 5) a connection between Marshall Beach Trailhead and Pierce Point Road using existing ranch roads, and 6) an Estero Trail loop using existing ranch roads.

These are the kinds of improvements that would allow me, living in Petaluma, to visit the area more regularly-and by bicycle, rather than in my automobile. It would be safer riding on trails, pathways, and ranch roads, rather than on the public roads that are used by autos and trucks. (I think the autos and trucks would like it better, as well.) Bicycling infrastructure is quite fragmented, so any improvements would enable many people to more of the area by bicycle.

#7378

Name: Chariton, Laura

Correspondence: DEIS Policy Recommendations for Pt. Reyes National Seashore (PRNS) Ranches Comments By the Watershed Alliance of Marin

The Watershed Alliance is grateful for opportunity to comment on the General Management Plan Amendment Draft of the Environmental Impact Statement (DEIS) for a General Management Plan regarding areas of Point Reyes National Seashore (PRNS) and Golden Gate National Recreation Area(GGNRA).

We are very concerned that the DEIS recommendations do not follow the applicable laws of the federal government and believe that the DEIS alternatives violate the laws quoted below. We also address scientific reasons for our conclusions below.

Because of the below listed concerns we can only recommend Alternative F. No Ranching Alternative The DEIS is inadequate and the NPS should re-examine and circulate another set of alternatives that includes restoration of the Point Reyes Peninsula and Olema Valley.



We endorse the letters of the Natural Heritage Institute, Susan Ives, Jim Coda, Audubon Society, Sierra Club, Judy Schriebman and Restore Pt. Reyes National Seashore.

Continued cattle ranching and dairying as proposed in the current DEIS ranching alternatives indicate that there will be continued adverse environmental impacts to natural resources, tule elk, salmonids, birds, amphibians, soil, air and water quality, coast chaparral, soils, water and air quality.

We must quantify and correct immediately, the loss of ecosystem services, critical habitat and sequestration of carbon from once intact ecosystems of native coastal scrub and grasslands. Culling and taking of tule elk for scientific purposes or herd management must cease immediately.

Consequently, all the ranching alternatives (except F) provided violate the Park Services duties under the three statutes and are therefore unlawful.

Protecting the National Parks natural resources is the first imperative. Over the course of the leases, we have not seen this occurring. The mitigation plans seem infeasible.

In this regard there are three relevant laws to consider:

The 1916 NPS Organic Act applies to all units of the national park system, including PRNS and GGNRA. The Organic Act provides as follows:

100101 (a) In General-

The Secretary . . . shall promote and regulate the use of the National Park System by means and measures that conform to the fundamental purpose of the System units, which purpose is to conserve the scenery, natural and historic objects, and wild life in the System units and to provide for the enjoyment of the scenery, natural and historic objects, and wild life in such manner and by such means as will leave them unimpaired for the enjoyment of future generations.

54 U.S.C. § 100101(a). (Emphasis added.)

With respect to the Organic Act, the Ninth Circuit Court of Appeals has held (in a case in which the Sierra Club was an intervening defendant, alongside NPS) that the language quoted above means 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).

The other two laws are the PRNS and GGNRA statutes.

The PRNS legislation provides, in pertinent part, as follows:

§ 459c-6. Administration of property (a) Protection, restoration, and preservation of natural environment

Except as otherwise provided in sections 459c to 459c-7 . . . the property . . . shall be administered by the Secretary without impairment of its natural values, in a manner which provides for such recreational, educational, historic preservation, interpretation, and scientific research opportunities as are consistent with . . . the maximum protection, restoration, and preservation of the natural environment within the area . . .

16 U.S.C. § 459c-6. (Emphasis added.) GGNRA legislation provides: §460bb - Establishment

In order to preserve for public use and enjoyment certain areas of Marin and San Francisco Counties, California, possessing outstanding natural, historic, scenic, and recreational values, and in order to provide for the

maintenance of needed recreational open space necessary to urban environment and planning, the Golden Gate National Recreation Area (hereinafter referred to as the recreational area is hereby established. In the management of the recreation area, the Secretary shall utilize the resources in a manner which will provide for recreation and educational opportunities consistent with sound principles of land use planning and management. In carrying out the provisions of this subchapter, the Secretary shall preserve the recreation area, as far as possible, in its natural setting, and protect it from development and uses which would destroy the scenic beauty and natural character of the area.

16 U.S.C. § 460bb. Our government has spent billions and untold amounts of volunteer and non-profit efforts on federal recovery plans for endangered and threatened species.

#### Natural Resource Protections

For context, the number of cattle/cows in the world is approximately 1.4 billion. The entire tule elk population in the world is estimated to be around 5700, under California Dept. of Fish and Wildlife Management and where there used to be over 500,000 in California - 1.15 percent of their original numbers. This exceeds the threshold for Endangered Species Act (ESA) listing. Predation is occurring from the NPS, ranchers and hunters. Recent scientific killing and culling has occurred. The tule elk chosen to be culled by humans may carry a genetic superiority that would protect the species going forward. Any intercession of this species is antithetical to tule elk biology. Culling a genetically superior animal (where one bull will retain the right to mate with his harem of as many as 30 cows) could put the population in jeopardy. The Parks alternatives that will affect wildlife and tule elk ignore the ESA and put the entire population of tule elk and other wildlife at risk with their plans. This genetic bottleneck created by humans and now given the fact of climate change stressors on ungulates, may be our last efforts to save this magnificent and important species, once indigenous to the PORE. To be considered for listing, the species must meet one of five criteria (section 4(a)(1)): 1. There is the present or threatened destruction, modification, or curtailment of its habitat or range. 2. An over utilization for commercial, recreational, scientific, or educational purposes. 3. The species is declining due to disease or predation. 4. There is an inadequacy of existing regulatory mechanisms. 5. There are other natural or manmade factors affecting its continued existence.

Best management practices (BMP) information provided to ranchers for decades has been ignored and habitat restoration for the "at risk" tule elk and other species has not occurred. Water quality monitoring reports from the scores of creeks of PORE affected by ranching are spotty, unavailable or non-existent. Salmonids are not recovering in Olema Creek or other watercourses on the Peninsula. The monitoring of creeks and BMP application because of staff, budgets and focus are also non-existent.

However, for profit solely, the tule elk, who are endangered and threatened are being limited, hazed, culled (killed) and by ranchers and their advocates to promote commercial interests alone. That this is occurring on our public parklands violates the trust of the NPS purpose. The facts are clear - continued public support of ranches and dairies, homes, modern dairy barns, lack of BMP needs to end. The ranchers were paid handsomely for their land and have been subsidized for decades. The chart on the number of cattle on beef cattle ranches appears to be missing or is confusing on pages 9-12. Restoring the PORE and its wildlife would be a gift to future generations and fulfill the guiding principles of the NPS.

Our first choice is to see the ranches gone and the lands returned to wilderness. The baseline for restoration should extend far past European ranchers to the legacy of the Coast Miwok.

Barring that from happening, and should ranching continue and in the hopefully short interim, ranchers have a stewardship responsibility to improve conditions on their property that is essentially public land. They should be assessed on a watershed-by-watershed and ranch-by-ranch basis. Of primary concern is adherence to all relevant federal and state laws protecting critical habitat, recommendations and mandates regarding climate impacts, land use, water quality, species protections, BMP stormwater and ranching practices.

Lacking funding, we have not seen the NPS able to monitor or assess the destructive conditions that are occurring from ranch practices so the idea of BMPs going forward is highly questionable.

#### Tule Elk numbers vs. cattle

Number of elk in the world - 5700 approx. There are approximately 500 in the PORE and 224 died a few years ago presumably from drought, most all at Tomales Point where they were essentially trapped behind a 12 foot fence. There has been some recovery with excellent subsequent rain seasons. However, the free ranging southern herds are in jeopardy of being culled through the EIS recommendations. We are abjectly opposed to this.

It has been determined by park biologists that the Southern free-ranging herds are healthier. So why would the NPS irresponsibly jeopardize an already extremely genetically vulnerable species by making a decision to cull them in favor of cattle or cows. The ecologic land and economic benefit derived from the elk should be established. Genetic diversity from the 1875 descendants of only 10 remaining tule elk is extremely limited and therefore any culling or losses should be considered a threat to the species survival. Johnes disease was originally contracted by elk from cattle at Tomales Point. Disease transmission between cattle and elk is more likely to occur from cattle crowding and unclean conditions.

#### Other issues

Allowing bicycles additional access into the PORE will further impact water quality, plant communities and further human harm to natural resources. Increased liability and safety concerns to other park uses will also occur from increased bicycle use on trails. For those reasons we are opposed to any increase or introduction of bicycles on trails.

We remember the Mt. Vision fire and the mass of devastation to ever increasing visitor numbers that puts the entire PORE at greater risk of this kind of disaster. Tule elk should be expanded throughout the park in order to restore the biological functions of the coastal prairie. That may include fire.

Should the above requests fail to be implemented and/or a new SEIR circulated as recommended by some:

#### Review and Make Public all leases

1. When a legacy ranching family retires a ranch, that ranch will be returned to the PRNS as wilderness and left open to elk. 2. Verification of all leases and lease language needs to be made public immediately. 3. Conduct a full count of all cattle and cows. 4. Make available all financial records and costs to the public regarding buildings and maintenance.

Land use recommendations - 1. Present practices allow non-native annual grasses to be planted and invade the coastal prairies. These grasses should be replaced with native bunch grasses, improving carbon sequestration. 2. Cattle herds need to be rotated more frequently to lessen impacts to water, soil quality, plant succession, carbon losses and erosion. 3. Regulation for completely non toxic and organic certification will be a first step on improving the land damages of the past 150 years. 4. Less intense use of current ranch practices should be happening in the face of climate change. 5. All ranches should be fenced accordingly but the tule elk should be allowed to remain outside those fences. 6. No fences should be constructed that have an adverse affect on wildlife. 7. No row crops or other farm animals allowed for production. 8. All lands impacted by grazing must be restored and protected first, i.e. red legged frogs, salmonids and snowy plovers 9. Cessation of manure spread during wet season. 10. Outlaw the inhumane practice of veal farming.

Water Quality degradation from the cattle is well established.

1. Reduced water quality impacts public lands off the ranches. Ban the use of rodenticides, glyphosates and all non-organic, toxic fertilizers and non-organic, toxic land management practices. 2. Any extension of leases

should prevail upon the lessee to the greatest extent possible with BMP restoration guidelines to fence out cattle while restoring all riparian corridors on intermittent, perennial, ephemeral streams to Clean Water Act standards and standards for the return of salmonids, western pond turtles, red legged frogs and other amphibians. 3. Setback minimums on streams will be predicated on the NOAA 2012 NMFS, Evolutionarily Significant California Central Coast Coho Recovery and Steelhead Recovery Plans and Clean Water Act/ Regional Water Board recommendations and scientific recommendations. 4. Insure that species like the elk, western pond turtle, red legged frogs and all other dependent species benefit from habitat recovery across species. (Monitor biennially) 5. If a ranch cannot improve water conditions within a 5 year period to an agreed upon standard that is the law, they will violate the terms of their lease and lose the right to ranch or stay. (Applicable laws include the Clean Water Act and the Regional Water Quality Control Board current standards.)

#### Reduction of Green House Gas Emissions

1. Climate change caused by loss of carbon into the atmosphere from land use practices and cattle must be reduced as per scientific recommendations (Marin Carbon Project) and government mandates. Many different management practices can improve a livestock operations production efficiency and reduce greenhouse gas emissions. Some of the most effective practices include but they must all be organic: Improving grazing management and quality of native grasslands. Soil testing, followed by the addition of proper amendments and organic fertilizers Supplementing cattle diets with needed organic nutrients Developing a preventive herd health program managing herd crowding. Providing appropriate water sources and protect water quality through riparian buffers and fencing. 2. No excess of allowable number cows or cattle on a ranch - Strict numbers maintained. 3. Eliminate Dairy operations and concentrated pollution. 4. Cattle produced methane that is contributing to Climate Change from the EPA -<http://www.epa.gov/rlep/faq.html> - "Globally, ruminant livestock produce about 80 million metric tons of methane annually, accounting for about 28% of global methane emissions from human-related activities. In the U.S., cattle emit about 5.5 million metric tons of methane per year into the atmosphere, accounting for 20% of U.S. methane emissions."

#### Health of the tule elk herd

1. Johnes disease is transmitted from degraded dense conditions. The cattle can easily transmit Johnes to the elk. 2. Test the ranch herds bi-annually for Johnes paid by the ranchers. 3. All ranches in the lessee program need to convert to certified organic and sustainable within a three year period. 4. Culling and taking for scientific purposes must cease immediately. 5. By not spraying and using toxins in production, the ecosystem improves, needs less intervention in the future. 6. Riparian restoration, slows erosion, improves water quality and prevents issues from exploding into financially prohibitive restoration fixes.

#### Eco-psychological argument.

1. This land is public. Its purpose is to restore our mind, body and spirit. The economic benefit derived by the ranchers is not an unrestricted entitlement. It has responsibilities to the public that underwrites their ability to remain in their businesses and lifestyle. Restoration education would be a better use of the resources of the park. 2. The healing, restorative, beauty filled allure of nature filled with wildlife is a growing economic benefit to human health and nearby communities. 3. Seeing the land ravaged by cattle is not restorative or recreationally satisfying for many who subsidize the ranches and the existence of the park through their taxes. Some prefer to think of it as bucolic and pastoral without the associative degradation of the land and surrounding wildlife caused by ranching. 4. The public believes that the NPS is caring for our parklands, the natural resources including the wildlife that inhabit them. Without assurance that that is exactly what is occurring, a direct loss of confidence in the NPS is and will continue to occur.

Sincerely,

Laura Chariton, President, Watershed Alliance of Marin.

#7379

Name: Wagner, Leilani

Correspondence: I prefer alternative F. Parks should be set aside for the preservation of diminished natural world - needed for humans to survive. Taxpayers shouldn't be subsidizing cattle operations that harm biodiversity as well as air quality, soil quality, and so much more. If we move forward with the original plan, we are killing nature, natural biodiversity and in turn will be killing our planet and in turn, humanity. Plants will die, animals will die, and humans will die off, the planet will live on & heal herself.

#7380

Name: N/A, N/A

Correspondence: The Tule Elk should not be killed for any private industry. The 5,000 cattle that are being exploited shouldn't be grazing on public lands if the public is not going to be able to benefit from the cattle owners benefiting from our public lands. The cattle owners lease should be extended but to the lands furthest away from with the least amount of damage to the environment. Also, charge them more so we can protect our environment and animals.

#7381

Name: Barrett, MD, James

Correspondence: Dear Gentlepersons:

As a retired family physician and owner of farmland (I'm generally supportive of family farms and ranches in most cases) I write to argue against expansion of cattle operations and reduction of Elk herds at Pt. Reyes National Park. My reasons are:

1. The American diet already consists of too much red meat leading to increased atherosclerotic vascular disease. Increasing cattle production only worsens the situation. Also, there is no need for an adult to have a daily glass of milk. We do not need more dairy production.
2. Mental Health. As we force cities and towns to increase their population density to avoid reckless building on farm land and natural habitat we must provide and maintain natural habitat so city folks can visit and enjoy natural habitat settings. We know that visiting habitat and viewing wild animals in their natural setting can restore mental health in many people. The Park, paid for with taxpayers dollars, is well equipped to meet this need as long as it is not destroyed or compromised.
3. Economic. The Park as a wild animal habitat is a magnet for tourists. Tourists will spend money in the surrounding communities therefore boosting the economy for many rather than a select few who profit from cattle raising on public land.

Thank you for your time

#7382

Name: Stockmann, Kevin

Correspondence: Dear National Park Service,

Please do not expand commercial agriculture in the Point Reyes National Seashore. Please honor the original agreement - allow the ranchers to operate their dairy or cattle ranches until the family members no longer wish to operate. Please do not allow any increase in ranching or new agricultural activity. Please absolutely do not allow the introduction of sheep, goats, chickens or pigs, or row crops. These activities invariably create wildlife conflict

and degrade the our National Seashore. The goal of the original agreement was that ranching would eventually be phased out.

Your preferred alternative benefits the very few ranchers at the expense of nature, wildlife and the American public. The public wants places left wild, space for nature, place where Americans can witness the beauty of the natural world not more agriculture.

Regarding the Elk, the long-term goal should be to increase the Elk's area as the ranches are phased out over time. The ranches should not be staying permanently. When the families sold their land, they got a very good deal, current ranching activities may continue until the original family members move on. Whenever a ranching family is ready to leave, please return that land to the people of the United States. Ranches should not be transferable to new owners, and ranching activity should not expand.

Please manage the National Seashore for the greater good of the American People, and our natural resources, and not for the few wealthy ranching families. There is plenty of other ranching in Marin County.

Please reconsider the alternatives and choose one that does not expand commercial agriculture and re-affirms the long term commitment to removing the ranches one by one as the time comes.

Thank you.

-Kevin

#7383

Name: Melo, Stacey

Correspondence: No more dairy farms! We have enough / too many. They are destroying the planet and inhumane. Leave the elk alone.

#7384

Name: Bruckert, Claudia

Correspondence: In my opinion it is more important to protect our wildlife than the farming business. Please protect the elk. Thanks, Claudia Bruckert

#7385

Name: Dinah, Dinah

Correspondence: The elk need protection. The cattle ranching is destroying life on earth, don't you guys read the news. We are living through a time of mass extinction. This is NOT the time to worry about ranchers making a living. This is a moment we must seize to save everything we are otherwise about to lose. The elk deserve every protection. In the words of Greta Thunberg, "How dare you" We will not forgive you.

#7386

Name: Maniar, Jennifer

Correspondence: Elk to stay, ranchers out, it's simple. This is our parkland, so it is now finally time for the ranchers to go.

#7387

Name: Hein, Patricia

Correspondence: I vehemently oppose the National Park Service's plan to kill native tule elk and expand

commercial agriculture in Point Reyes National Seashore and Golden Gate National Recreation Area. I care deeply about protecting California's wildlife. Our government should act in the best interests of the public at large and not in the best interests of a small group of ranchers who are motivated by profits. I urge the National Park Service to stop the destruction of our lands and instead, restore and preserve the lands for wild animal habitat.

This land belongs to the public, not private ranchers whose main goal is to profit from our public land. And profiteering comes at the expense of our unique natural resources. The ranching activities destroy the beauty of this public space, pollute the lands with millions of pounds of manure each year, result in the destruction of native plants, and cause the brutal killing of the beautiful tule elk.

These public lands that are home to native plants and wildlife should be available for the enjoyment of many, and not taken away to satisfy the financial interests of a few. This precious space should be preserved for the enjoyment of members of the public and left as our legacy to our children and grandchildren.

Our government is of the people, by the people, and for the people. I urge the National Park Service to act in the best interest of the people rather than in the interests of a few ranchers. Please restore, preserve and protect the Point Reyes National Seashore and Golden Gate National Recreation Area. Our children deserve nothing less.

Thank you.

Patricia Hein

#7388

Name: Holloway, Sandra

Correspondence: As a member of the California-based international animal protection nonprofit organization In Defense of Animals with over 250,000 supporters, I oppose the National Park Service plan to kill native Tule elk, grow commercial crops, and permit ranchers to add chickens, turkeys, sheep, pigs, and goats to their exploitative operations. For this reason, I support Alternative F.

As national park land, this property was specifically set aside to protect, restore, and preserve the natural environment including the wild animals who live there. The original intention was to phase out dairy and cattle ranching, not add more crops or animals to increase ranching profits.

The proposed plan does not address the damage from grazing, including water-quality degradation and soil erosion. Also, adding new crops will create more conflicts with native wild animals.

Please abandon this inhumane and destructive plan by selecting Alternative F. I urge you to restore the Seashore's Pastoral Zone for wild animal habitat and repurpose historic ranch buildings for scientific research, interpretation, and public education.

#7389

Name: hugdahl, sarah

Correspondence: Living on the Salmon River and loving to pack into the surrounding mountain ranges makes me very familiar with the long term impacts cattle have on the soils and water, weeds and wildlife. When my husband and I escape the now regular smoke, we usually head west to the coast then north. One place we always stop at is Point Reyes Nat'l Seashore and NOT to take in the surrounding cattle. There is nothing like seeing Tule elk in their home range. If you can't protect the small population there, what is your Park for? It's taken a lot of time, money and effort to restore Tule elk to Point Reyes, the ONLY national park where they live. I'm tired of ranchers getting subsidized.

#7390

Name: Hajek, Ryan

Correspondence: Please leave the livestock ranchers out of Point Reyes and Golden Gate coastline areas. This is a natural treasure of an area and I frequent it often when I visit my family in Marin. Leave the elk alone and leave ranching profits out of this beautiful area.

#7391

Name: Jasper, Marilyn

Correspondence: PUBLIC INTEREST COALITION \_\_\_\_\_ September 23, 2019 GMP Amendment c/o Superintendent Point Reyes National Seashore 1 Bear Valley Road Point Reyes Station, CA 94956  
RE: Pt Reyes Nat'l Seashore- -General Management Plan Amendment Draft Environmental Impact Statement-  
Public Comment Although guidelines to submit substantive comments are always appreciated, when aspects of a proposed project or management plan are strongly unacceptable, it puts the public in a non-trusting mode. In turn, that sets the stage for public comments to criticize the process and/or those who have authored or pushed it forward. The National Park Service (NPS) needs to consider those perceptions and not be dismissive of concerned citizen comments. No management plan should allow ranching to continue, or other "farming" type activities to expand, at or on Pt Reyes National Seashore or its environs. This is due to eco-system negative impacts that are well known with (1) livestock operations (animal waste, soil contaminates, antibiotics residue, water quality, and other serious "pollution" aspects) and (2) farming activities (herbicides, pesticides). We urge that only a "No Ranching" or other "No Private use" of Pt Reyes land alternatives be adopted. Ranching, with all its well-established negative environmental impacts, does not belong on any public lands- -especially near coastal or scenic areas. Whether there be fragile, sensitive species or iconic wildlife, such as tule elk, is a moot point. Public, federally owned land, such as Pt Reyes, must be devoid of private enterprise operation intrusions and barriers. Once leases are cancelled/expired or otherwise legally terminated, then all private parties must be ordered to move off/vacate Pt Reyes lands entirely. The management plan must make the parties (leaseholders or other occupancy arrangements) be responsible for removal and clean-up of all private property. Posting a bond to cover clean up should always be included. Taxpayers should not fund clean-up, toxic or otherwise, of current leaseholders or their subsidiaries, and there should be no exceptions. When Pt Reyes reverts back to public lands, National Seashore and National Park Service need to fully manage for landscape and ecosystem benefits, including but not limited to preservation of resources, limited/specific hiking/equestrian only trails, shuttles, parking, and other passive activities that create no significant impacts. There are enough areas in Marin and Sonoma Counties to accommodate those who desire longer stays. Therefore, no camping or overnight accommodations should be considered. Strictly limited, reservation-only backpacking may be allowed in a few Pt Reyes areas but only if there is full enforcement capacity and no impairment of natural resources. Thank you for considering our views, Marilyn Jasper, Chair

#7392

Name: Bostock, Jerilyn

Correspondence: As a member of the California-based international animal protection nonprofit organization In Defense of Animals with over 250,000 supporters, I oppose the National Park Service plan to kill native Tule elk, grow commercial crops, and permit ranchers to add chickens, turkeys, sheep, pigs, and goats to their exploitative operations. For this reason, I support Alternative F.

As national park land, this property was specifically set aside to protect, restore, and preserve the natural environment including the wild animals who live there. The original intention was to phase out dairy and cattle ranching, not add more crops or animals to increase ranching profits.

The proposed plan does not address the damage from grazing, including water-quality degradation and soil erosion. Also, adding new crops will create more conflicts with native wild animals.



Please abandon this inhumane and destructive plan by selecting Alternative F. I urge you to restore the Seashore's Pastoral Zone for wild animal habitat and repurpose historic ranch buildings for scientific research, interpretation, and public education.

#7393

Name: McClean, Nancy

Correspondence: Hi! As a 4th generation Californian and a descendant of cattle ranchers I'm begging you. Please do not hurt the elk! The park service really needs to make this a priority. It is your responsibility is to protect wildlife. Point Reyes research has shown that cattle can ruin the environment and are a large contributor to climate change. We need to decrease the cattle herds in Point Reyes. Please help us return California to it's natural state. Thank you! Nancy McClean

#7394

Name: Misner, Claudia

Correspondence: In a world where cattle are causing problems for the environment, let the lands of Pt. Reyes be for the wildlife. Let the elk live free.

#7395

Name: Palladini, Cassin

Correspondence: Hello. My name is Cassin and I am 9 years old. I really like camping at Point Reyes National Seashore. I really enjoy all of the wildlife and I like hiking and camping and hanging out on the beach. I personally think that the elk are important to Point Reyes and the cattle should go and raise the cattle somewhere else. Thank you.

#7396

Name: Ozkok, gumus

Correspondence: please do not shoot the elk. live & let live. thank you.

#7397

Name: james, richard

Correspondence: Thank you for the opportunity to submit comments on the current PRNS General Management Plan Amendment Draft EIS.

Page 32 of the DEIS states in part:

Development to Support Day Use and Overnight Accommodations

NPS would look for opportunities to expand day use and overnight accommodations in the planning area.

- Drive-in, hike-in, and boat-in camping sites with limited services and amenities (several locations offer possibilities to consider for expanding overnight camping, such as Schooner Bay near Drakes Estero or Home Ranch)

In light of the current condition of the boat-in camping sites on the West shore of Tomales Bay are frequently found in (various trash items including human and canine feces and toilet paper), I would ask the NPS to delay adding more boat-in camping until such time that current boat-in camping locations are managed in such a way that maintains the natural habitat and prevents human and canine waste from being deposited.

More frequent and regular patrolling of the Tomales Bay boat-in sites is suggested as well as better signage at campsites and at all likely boat put-in locations (Marconi, Miller Park, Lawson's Landing).

Requiring all boat-in campers to possess and use their own toilet facilities, packing out all waste is also strongly suggested.

#7398

Name: Palladini, Viola

Correspondence: Hello. My name is Viola and I am 11 years old. I go to the Lighthouse and go backpacking in Point Reyes a lot and like looking at the elk in the fields. We go to the beach on weekends and summer vacation and I don't want you to get rid of any elk and I would prefer you got rid of the cattle instead.

#7399

Name: Atherton, Amy

Correspondence: I am a lifelong Marinite, who grew up in Fairfax and now raising my own family in Kentfield. One of the great joys of living here is the beauty of West Marin and all the creatures who live there, not least of all, the Tule Elk. Their removal would be a shame and a sad story to tell my children. PLEASE do not make them disappear, it would be heartbreaking to me, my family and all of those like us, who grew up here and have fallen in love with these magnificent creatures.

#7400

Name: Reule, Linda

Correspondence: I have been lucky enough to discover Point Reyes National Seashore on my recent visits to California. I am considering relocating to California from Illinois and would like to consider Point Reyes Seashore to be the backyard in which I could truly frolic. I have also brought my elderly mother with me and we both truly enjoyed traveling through the park, seeing the ocean, Drakes Bay, Tomales Point, and the Pierce Point Ranch where the Tule Elk call home (protected pend in area). I am saddened to hear about the plans to expand ranching (by allowing additional farm animals and growing commercial crops) on the national seashore while NOT advocating to protect the native Tule Elk, but rather, to eliminate or relocate them. I was shocked to see that the planning documents talked so highly about preserving the current ranches because the only ranch I could connect with, explore and enjoy was the ranch that no longer has cattle. I would like the Park Service to adopt Alternative F. - -Phase out all ranching, as was originally intended. - -Manage the Seashore for the natural values it was created to PRESERVE - its land, water, and wildlife. - - Protect wildlife over livestock. - -Restore the pastoral zone for wildlife habitat, native plant communities, scientific Research and Education. - -Repurpose the historic ranch buildings for research, interpretation and education. The public would benefit from an expanded vision of Alternative F, to restore Point Reyes.

#7401

Name: N/A, Ron

Correspondence: Hi, I find it disturbing and sad when the National Park Service considers destroying natural life for the sake of domesticated life. Beef can be raised anywhere humans want. Why does a family keep its job because they have been doing it for a while? How many other people are guaranteed a job in this manner? Times change, they need to move on like countless others have been forced to do. Eminent Domain? Thank You for your time, Ron

#7402

Name: N/A, Debbie

Correspondence: In support for saving the elk's habitat

#7403

Name: Pervier, Fenn

Correspondence: Please open Pt. Reyes seashore for bicycle riding.

#7404

Name: Seidman, Anna

Correspondence: September 23, 2019

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

Re: Safari Club International Comments on the National Park Services Draft Environmental Impact Statement for the Point Reyes National Seashore General Management Plan Amendment

Dear Sir or Madam:

Safari Club International (SCI) appreciates the opportunity to comment on the Draft Environmental Impact Statement for the Point Reyes National Seashore General Management Plan Amendment (Draft EIS). SCI disagrees with the National Park Services (NPS) preferred alternative and with the scientific analysis upon which it is based. SCI respectfully recommends that the NPS adopt a new alternative that would direct the units managers to take the necessary steps, in coordination with California state game and fish management authorities, to initiate a regulated harvest designed to reduce and maintain the tule elk population on the National Seashore.

Safari Club International

Safari Club International, a nonprofit IRC § 501(c)(4) corporation, has approximately 45,000 members worldwide. SCIs missions include the conservation of wildlife, protection of the hunter, and education of the public concerning hunting and its use as a conservation tool. SCI has many members who live and hunt in California, some of whom would like to participate in tule elk hunting on Point Reyes National Seashore lands.

Hunting May and Should Be Authorized on the Point Reyes National Seashore The Draft EIS correctly concludes that the NPS could authorize hunting on Point Reyes National Seashore due to the language Congress used in the National Seashores enabling legislation (16 U.S.C. § 459c-6(b)). SCI disagrees with the NPSs conclusion that a managed hunt on National Seashore lands should be rejected due to efficiency, expense, and safety concerns.

The Draft EIS correctly notes that managed hunting differs from culling programs in which the NPS utilizes volunteers to reduce game populations on National Park units where legal hunting may not occur. The NPS should also recognize that state and federal wildlife managers frequently use hunting as a management tool to reduce and maintain wildlife populations. In such hunts, state wildlife managers target certain numbers, age class, and sex of the population to be hunted by regulating the harvest conditions. With the assistance of the California fish and game management authority, the NPS could conduct a hunt on Point Reyes National Seashore lands that would appropriately reduce and manage its tule elk population.

Ironically, the Draft EIS relies on the same arguments to justify the impossibility of a regulated hunt that the NPS has routinely used to avoid instituting skilled volunteer programs for ungulate population reduction on National Park units. The Draft EIS, just like the EISs the NPS has drafted for numerous ungulate reductions on National Park Service units where hunting has not been allowed, rejects hunting and skilled volunteer programs due to efficiency, expense, and safety concerns. The Draft EIS appears to set up a Catch-22 scenario in which the NPS suggests it is unable to use a skilled volunteer program due to the fact that the NPS has the authority to establish a regulated hunt but then rejects a hunt due to these same efficiency, expense, and safety excuses. SCI seriously questions the following, unsupported statement from the Draft EIS:

Sharpshooting offers safety features that a typical managed hunt does not. Although it is not suggested that hunts cannot be done in a safe manner, the extensive planning and oversight that would be required to ensure a level of safety comparable to wildlife professionals engaged in sharpshooting activities make a managed hunt less feasible.

Draft EIS at 63. After years of making similar excuses to defend its decisions to choose sharpshooters over skilled volunteers, the NPS itself proved the fallacy of its safety and expense protestations. In 2016, the NPS published a National Resources Report that evaluated its own skilled volunteer programs. In that report, the NPS acknowledged that such programs have not proven to be exceedingly costly to run and have not posed unnecessary safety hazards. Elk Management in the National Park Service - Two Case Studies in the Use of Public Volunteers (Natural Resource Report NPS/NRSS/BRD/NRR - 2016/1119). Based on these findings, the report also concluded that the NPS could utilize skilled volunteer programs for white-tailed deer management in the mid-west and eastern U.S.-areas with higher human population densities than the NPS previously considered appropriate for such management strategies. Id. at 18. It appears that being disproven in applying these arguments against skilled volunteer programs, the NPS has refocused these arguments for use against hunting programs.

SCI also questions the NPSs conclusion that it may only authorize a hunt that would be more efficient or less expensive than the use of paid sharpshooters or NPS personnel to reduce the Point Reyes National Seashores tule elk population. Draft EIS at 63. SCI challenges the source of such a pre-condition to opening hunts on NPS units where hunting is authorized. Moreover, in assessing the value of a regulated hunt, the NPS should evaluate more than the limited factors of efficiency and expense. The NPS should not ignore the other important rewards hunting would offer. In addition to adding a new NPS outdoor recreational experience, participation in tule elk population reduction would benefit hunters by enabling them to play a contributing role in National Park wildlife management.

#### The NPSs Assessment of Cost Is Based on Inaccurate Calculations of Elk Population Numbers

Presumably, the NPSs determination that a regulated hunt would be exceedingly costly relies at least to some extent on an underestimation of the harvest numbers necessary to maintain the population size at 120 elk. The preferred alternative incorrectly proposes the culling of only 12-15 elk per year. However, based on Spatial Ecology and Population Dynamics of Tule Elk (*Cervus elaphus nannodes*) at Point Reyes National Seashore, California, by McCrea Andrea Cobb at UC Berkeley in 2010, the average annual growth rate of the herd has been between 18-20%, which would mean that the annual cull numbers should be 22-27 elk per year. Consequently, if the NPSs concern about the costs associated with a hunt vs. the use of skilled sharpshooters for only 12-15 elk, the drafters should re-examine their cost estimates, using the correct harvest numbers.

In summary, SCI strongly recommends that the NPS reject the proposed alternative and instead take the steps necessary to open a hunt on the National Seashore. SCI also recommends that the NPS should delete the inaccurate and inflammatory description of the efficiency, costs and safety issues related to managed hunting included in the Draft EIS.

Thank you for the opportunity to provide this input. If you have any questions about these comments, please contact Anna Seidman, Director of Legal Advocacy and International Affairs, at [aseidman@safariclub.org](mailto:aseidman@safariclub.org).

Thank you.

Sincerely, Steve Skold President Safari Club International

#7405

Name: Henn, Don

Correspondence: There is plenty of land for both. I hike out in Point Reyes National seashore alot. At lease a few times a week. For the most part the elk are not even Close to cows. Farmers want more land for there cows to destroy.

#7406

Name: Arndt, Laura

Correspondence: I am a long time resident and property owner in pt Reyes 40 years. I have opposed these decisions based on incomplete data, as this is. For instance those against ranching in the point say that the red legged frog is threatened. But the data shows that the only reason pt Reyes is full of these frogs is because they thrive in the stock ponds. The population of elk need to be culled, they are multiplying at a rate that is unsustainable, for the environment and the health of the herd. The benefits of livestock grazing on grasslands is so important that if ranching were reduced or eliminated The park would have to hire its own herd to control the grasslands or do extensive mowing. There are several other valid arguments and issues to be raised with this proposal and they need to be answered The park has done some great work here and they have many challenges but these ideas that come from the park being a wilderness ( where millions of people travel through and ranchers need to go Are from people overreacting Problems need to be solved without making things worse The elk herd is too large for the point, They need to be contained out of the pastoral zone

Thank you

#7407

Name: Romaniwski, Gregory

Correspondence: I wholeheartedly support plan F.

This agreement was made decades ago, with a long since expired lease agreement. The ranching parties have had more than ample time to move their business to alternative locations. Their commercial activities are destructive to environmentally sensitive lands. The Point Reyes National Seashore deserves our vigorous protection. The native wildlife deserves our protection as well. Thank you for accepting public comments.

#7408

Name: Weatherford, Roger

Correspondence: I support alternative F.

I think maintaining the environment for tule elk is very important. Converting it to grazing lands is short sighted.

thank you.

#7409

Name: Wallace , Norma

Correspondence: I protest completely and 1000% this appalling plan to decimate a recovered native species and replace it with animal agriculture. This plan flies in the face of the definition of National Park. The country decided years ago to protect the land from animal agriculture. This is against the will of the people, it is anti science, anti common sense, will cause environmental devastation and toxic conditions. I assuming will pollute groundwater.

The elk did nothing wrong, They did what we humans wanted, they reproduced. Now you want to kill them. What happened to the sanctity of life?

It simply makes no sense. I protest!

#7410

Name: Harrar, Paul

Correspondence: I grew up in the Bay Area and have appreciated the wildness of the Point Reyes National Seashore area since the 1970s. I currently visit the area 3-4 times a year, usually staying several days. I am primarily a hiker and kayaker.

My arguments FOR elk and AGAINST cows in GGNRA are: 1. Cows are a non-native species that pollute and degrade the environment and add no significant scenic, cultural or historical value for visitors, or most West Marin residents. 2. Elk have a limited environmental range for biological success; cows can be raised in many places elsewhere. This is an important habitat for elk. 3. As was done with Drakes Estero, an opportunity to successfully restore an area to wilderness (in a park boundary) should be undertaken, if feasible. Wilderness is more valuable longterm than dairy businesses. 4. Historic ranches can be retired as dairy businesses and transitioned to other uses, including visitor lodging, cultural/historical education (museums) and environmental science labs. 5. I'm fine with dairy ranching continuing to operate east of Tomales Bay.

Thank you for listening.

Paul Harrar

#7411

Name: N/A, N/A

Correspondence: These comments are submitted in response to the National Park Service's Draft Environmental Impact Statement concerning the General Management Plan Amendment for the Point Reyes National Seashore and north part of the Golden Gate National Recreation Area (Seashore). The comment period is August 8, 2019 through September 23, 2019.

Preliminarily, the report fails to address the limitless recreational opportunities already available at the Seashore, making option F, ceasing ranching at the Seashore, completely unjustifiable. After all, only 28,000 acres of more than 78,000 acres at the Seashore are used for ranching and dairying. Meanwhile, thousands of acres are available for camping, hiking, biking, and other recreational activities. Of great importance, the Draft General Management Plan Amendment (DGMPA) fails to adequately address the adverse economic impact ceasing ranching and/or dairying at the Seashore would have on food quality, organic agriculture and the agricultural sector in Marin County and indeed California and the nation as a whole.

Agriculture in Marin contributes over \$94 million annually to the local economy, with milk production dominating. In 2018, organic milk was the No. 1 agricultural commodity produced by Marin County farmers and ranchers with a gross value of \$28,035,000. Over 15 percent of Marin's agriculture is on the Seashore and 100 percent of it is organic. This is significant because Marin County's agriculture makes an important contribution to California's overall output of organic beef and dairy production allowing California to enjoy the reputation of having the highest volume of organic production in the country.

No where does the DGMPA address the distinction between organic and conventional agriculture in land stewardship, environmental benefits and food quality. Organic agriculture excludes, among other things, toxic or synthetic fertilizers, genetically modified organisms (GMOs), synthetic hormones, antibiotics, artificial preservatives, flavors or colors.

At the heart of organic agriculture is developing healthy soils which provide many benefits such as holding more water, reducing erosion, fertilizing grasslands and sequestering carbon. To forego these benefits for the environment, food security, and the economy so that additional Tule Elk can freely roam is misguided public policy.

See: <http://growninmarin.org/files/225395.pdf> <https://www.marincounty.org/main/county-press-releases/press-releases/2019/ag-cropreport-061819> California Department of Food and Agriculture website viewed at

<https://www.cdfa.ca.gov/oefi/>

<https://www.ams.usda.gov/sites/default/files/media/BehindTheUSDAOrganicSeal.png>

#7412

Name: N/A, N/A

Correspondence: Stop kowtowing to the dairy and meat industry and please protect our wildlife that's already in peril. Thank you.

#7413

Name: Nappe, tina

Correspondence: General Management Plan amendment (GMP Amendment) for Point Reyes National Seashore and the North District of Golden Gate National Recreation Area

The General Plan provides six options addressing the future of ranching on the Point Reyes National Seashore. Alternatives include maintaining ranching as is, various reduced ranching operations to elimination of ranching under Option F. Option F provides the most benefits to Tule elk by removing ranches and enabling elk to expand to sufficient numbers to presumably support a more varied genetic pool.

Comments are based on, and generally in support of, the NPS's Option B proposing 20-year Lease Agreements and providing some flexibility in ranch operations. Option B allows NPS time to recognize changing park service needs and as leases expire or successor issues arise, termination of ranch ownership to expand recreation or Tule elk populations.

1. The employment and labor income section discusses the number of jobs but not the quality and type of jobs or the ramifications of those jobs. Ranchers are generally members of and leaders in their communities including conservation districts (CD) where issues such as water quality, soils, and invasive species etc. are addressed. Phasing out ranching separates NPS from CD (Marin Conservation District?) and other soil and water initiatives. NPS staff who are generally transitory and not necessarily knowledgeable about soils or water management will ideally work with ranchers. NPS and the ranchers can be leaders in water and landscape management.
2. Twenty year leases with an option to renew are desirable to encourage rancher investments and maintenance of the properties. Twenty years also gives NPS time to conduct its own planning including removal of a ranch property to meet public or natural resource priorities. Existence of these leases may have forestalled more recreation development along the road with parking lots, restrooms, another visitor center etc.
3. The discussion on organic food, local markets, and income production could be highlighted more. Locally grown organic food has been growing in popularity in recent years; the Point Reyes ranches, should they continue, may provide the only locally raised products as urbanization sucks up ranch land from San Francisco to Point Reyes.
4. Since Point Reyes was founded, the National Park Service has been expanding its definition of lands and values to be preserved. According to the Wilderness Society, National Parks has added 13 Parks, Monuments, and Historical sites celebrating Black History <https://www.wilderness.org/articles/article/13-parks-and-monuments-celebrate-black-history>. At Point Reyes there is a living history. By contrast Pierce Ranch, lovely in its isolated splendor cannot portray a real scenario of a working ranch. The proposals to expand the definition of ranch via sheep, poultry crops, events, can expose an increasing urbanized public to domestic animals and use of those animals. The ranches, as examples of a 100 year old history, have increased in historical value as examples of our past as NPS preservation goals expand. However, boarding horses seems removed from ranch operations. Hauling horses will increase burden on road system; presumably horse owners will want to use trails. What is the policy on a private vendor using public trails? Chickens might be housed in movable coops as part of producing healthy eggs and meat.

5. NPS cannot possibly design plans, let alone implement plans, given the scarcity of funding, should ranching at this point be terminated within 5 years or even 10. The lease income on the ranches may primarily cover NPS time working with the ranchers, but ranchers not NPS funds cover any improvements. Maintenance or removal of historical buildings will require years to determine via a planning process. Terminating a lease even 5 years from now will discourage maintenance of buildings, fences, etc.

6. The ranch existence may have forestalled more recreation opportunities. There will surely be pressure to increase the number of visitors from the current 2.5 million. I can personally vouch for turning around when I encountered heavy traffic. Impacts on wildlife from recreationists especially on the beach and waterways must be addressed before a lease is terminated to make way for more recreation. I assume a plan for the proposed recreation will be presented for public review. Recreation also impacts wildlife and natural resources especially on beaches and around waterways.

7. How will NPS address noxious weeds or other undesirable plants or maintain pasture land should NPS desire to do so on former ranch lands? Shrubs will invade; elk apparently will not forestall shrubs. Perhaps I missed the discussion but which species of wildlife and pollinators prefer pasture to shrub lands? Removing invasive plants is difficult. Does grazing via cattle or elk at least limit exotic expansion? 8. What is the current and projected fire management regime with or without ranchers? Ranchers presumably do some irrigation to maintain pastureland. Ranch employees are available to fight fires. Once pastures are emptied and shrubs invade, what is the likelihood of fire?

9. While the period of honoring the conditions of the original purchase are at an end, both conservationists and the park service should continue to recognize how the park was acquired and how treatment of landowners is a model for other potential acquisition opportunities.

10. There is a section of "savings in gas and air pollution if ranches are removed." If ranch use is expanded to include room rentals, workshops, horse riding or other new uses of the ranches are proposed etc., increases in transportation also must be considered. Presumably ranch transportation will not exceed tourist impacts. Increasing tourists will also result in increased transportation costs.

I do not live in California but have visited Point Reyes over the years. I attended one of the Sierra Club's invasive weed removal service trips at Point Reyes. (Weeds are not just caused by livestock.) I serve or have served on boards of land trusts where working with landowners to acquire property or development rights on property is necessary and long-term relationships are desirable.

#7414

Name: Wimpfheimer, David

Correspondence:

Dear Superintendent,

Thank you for the opportunity to comment on the Draft Environmental Impact Statement(DEIS).

As a background, I have lived in West Marin for almost forty years. In most of those years I have worked as a naturalist for many organizations and have taught hundreds of natural history classes in Point Reyes National Seashore. As an ornithologist, I have conducted numerous studies on wetland species and other birds in West Marin. I have served on the board of two organizations that are concerned with natural resource protection in the seashore and other parts of West Marin. In short, I have a detailed knowledge of wildlife in area and the diverse natural history at Point Reyes National Seashore.

The enabling legislation that created Point Reyes National Seashore in 1962 indicated that ranching would continue in the national seashore indefinitely as long as those original families/leaseholders continue their



operations in the area. Unfortunately, the enabling legislation did not specify what is an acceptable amount of livestock in the national seashore. Nor did it make clear that the natural resources in the park should be protected fully and have precedence over domestic animals and agricultural operations.

Since 1962, there seems to have been a compromise in the national seashore; there has been ranching in the pastoral zone, but there has also been a fair amount of protection of the natural resources. I accept that ranching can continue at the national seashore, but I would like to know what impacts the beef and dairy cows have on various habitats and wildlife in the park. I strongly feel there should be scientific studies to document these exact impacts. If there are documented negative impacts than clearly the number of cows should be reduced to an acceptable number.

Specifically, I am concerned about three management issues; diversification, succession and the culling of elk.

## DIVERSIFICATION

I have read that "Diversification activities identified through the scoping process and ongoing discussions include the addition of new types of livestock, row crops, stabling horses, paid ranch tours and farm stays, small-scale processing of dairy products and sales of local agricultural products..."

In my opinion, it is extremely difficult to quantify not just the physical impacts those activities will bring to the pastoral zone, but the aesthetic ones as well.

I am greatly concerned about the level of these potential impacts therefore I feel that authorized ranching operations should be limited to dairy and cattle ranching, as intended by the enabling legislation.

I feel that limiting the commercial uses of the area is necessary to preserve the natural and cultural resources of the Seashore.

The preeminent mission of the National Park Service is to conserve natural resources. The Seashore's enabling legislation provided for a limited exception for beef and dairy ranching consistent with the maximum protection, restoration, and preservation of the natural environment.

Unfortunately, the DEIS allows for diversification in the national seashore. Diversification, or increased agricultural activities, would be contrary to the Park's mission.

The DEIS exceeds its authority in proposing diversification. And the DEIS has not analyzed many connected and cumulative effects of diversification on environmental resources. All the biologists and others with wildlife expertise I have talked agree with me. Diversification would have negative impacts on predators such as bobcat, coyote, fox, hawks and owls. The negative impacts would not be limited to predators, but would be seen on all levels of the food chain.

The DEIS ignores that diversification could bring a dramatic shift of commercial land use within the Seashore.

I feel that limiting the commercial uses of the area is necessary to preserve the natural and cultural resources of the Seashore.

## SUCCESSION

To be consistent with the park's purpose, the Seashore must focus continuation of ranching on cultural and historical significance of multi-generational beef and dairy ranching.

The DEIS would open ranching operations through competitive bidding process to the general public. I am strongly opposed to this change in the management philosophy at Point Reyes.

Opening the Seashore to outside operators would have significant impacts on the park's cultural and historic values. The DEIS fails to analyze these impacts, and even fails to provide enough detail about the RFP process to say what the impacts may entail, or when they may occur.

#### CULLING OF ELK

I understand that grazing elk can compete with cows for available forage in the national seashore. Has the park explored all possible solutions to this conflict? The construction of fences, while costly, might be one solution to allowing the number of elk to expand in the pastoral zone.

When the family occupying the "D" Ranch left the national seashore their lease expired. This would have been a logical time to create a reserve just for elk and not cows in that area. That did not happen. That is an example to me of the park choosing ranching over protection of the natural resources.

The DEIS calls for culling of tule elk. I am opposed to culling.

Consistent with the Park's management goals and directives, NPS management of Tule elk would occur only to support other resource protection needs and management goals. New herds would be allowed to continue, regardless of geographic location if they do not move outside Point Reyes.

Authorized animal units for each ranch would be adjusted as needed to meet residual dry matter goals. Resource protection is the highest value for the Seashore as intended by Congress in requiring the Department of the Interior to administer its Point Reyes lands "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 USC Sec. 459c (6)(a) (emphasis added).

#### CONCLUSION

I urge the NPS to adopt alternative B with modifications, including the complete removal of all diversification. The Seashore's highest values are the protection of Wilderness, Scenic and Coastal Landscapes, Marine, Estuarine, and Freshwater Environments, Diversity of Habitats and Native Species, Maritime Cultural Landscapes, Continuum of Human Use, and Opportunities for Inspiration and Recreation.

Resource protection is the highest value for the Seashore as intended by the 16 USC Sec. 459c (6)(a) where Congress elaborated on this statement by requiring the Department of the Interior to administer its Point Reyes lands "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 USC Sec. 459c (6)(a) (emphasis added).

The DEIS should reflect these values and consider the cumulative and connected actions of the proposed plan within the planning area and to sensitive habitats adjacent to the planning area.

Thank you for the opportunity to comment on the DEIS.

Sincerely,

David Wimpfheimer

#7415

Name: N/A, N/A

Correspondence: Leave the elk alone. Don't allow cattle grazing on elk territory, don't diminish elk herd numbers in order to facilitate cattle. Cattle do not belong on National Park lands. Don't let private industry profit from the slaughter of the tule elk. NO CATTLE!

#7416

Name: Schoenmann, Jason

Correspondence: Screw more fire road. If you want to keep mountain biking as a sustainable sport in Marin we NEED more singletrack. And if hikers don't want to share the trails then we need the first bike only trails in Marin. This place has so much potential for great riding bike tourism and an economic boost from Mountain biking. But nobody had realized the gain to the Marin economy and the legacy of Mountain biking in Marin. As a 16 year old rider I want to be able to progress, grow and enjoy the awesome mountain and coast in my backyard, but all these fire roads get real old real quick and leads to people riding trails they shouldn't because the trail infrastructure isn't there. In conclusion fire roads are only good for going up and suck if that's all you can ride.

#7417

Name: Leyse, Karen

Correspondence: Comments on the DEIS regarding management of Pt Reyes National Seashore and a section of northern GGNRA.

1. The 1962 enabling legislation for Pt Reyes National Seashore stated that the purpose was "to save and preserve, for purposes of public recreation, benefit, and inspiration, a portion of the diminishing seashore of the United States that remains undeveloped". The underlined portion of the statement of purpose is not included in the DEIS. Since it makes it clear that public recreation was a primary goal of setting aside the area, why has that language not been retained. The original measures for phasing out dairy and grazing operations were consistent with that purpose. My recollection of the public perception in the late 1960s and beyond is that the ranches and dairies would be phased out as the 20-year leases, or life estate exemptions expired. However, the dairy and ranching lands remain inaccessible to the recreating public. And the bulk of the alternatives presented do nothing to rectify that situation, as the total ranchland zone remains basically consistent with the current acreage removed from public use (Alternatives A -E). Although a few of the dairy buildings appear to be historic, there are many buildings that appear to have been built since the enabling legislation was past. Those buildings are not historic.

2. The Bay Area has increased greatly in size and population over the last 50-plus years. The increased population has resulted in jammed freeways as residents travel to places as far away as the Sierra Nevada to recreate. There is a crying need for more recreation opportunities closer to the population centers of the San Francisco Bay area and the western portions of the inland valleys. Pt Reyes is heavily used by hiking groups and additional trails would be a major boon to recreation in the area. My experience is that the ranching and dairy areas are closed to public access and do not represent a National Reserve environment. In addition, in a heavily populated region, with demonstrated need for more accessible outdoor recreation, it appears that over 1/5 of the Pt Reyes and northern GGNRA acreage is being reserved for exclusive use for dairy and ranching.

3. My experience, from surveying for native species in the vicinity of dairy farms in the eastern central valley is that dairy operations, with concentrated holding of cows, is very detrimental to water quality and soil conditions. The operations that are listed as being attendant upon these operations, such as fertilization and manure spreading, etc., are similarly inconsistent with an area reserved for its natural and recreational values.

4. Alternatives B through E show no real range of consideration in the area available to ranching. Although treatment of tule elk varies in several alternatives, only in Alternatives E and F are elk herds allowed to increase.

5. Alternative F is the alternative most consistent with the original intent of reserving these lands. Only in alternative F is there any real consideration of increasing visitor (and recreation) opportunities within the planning area.. This is a change that is sorely needed within the region, and is the most consistent with the enabling legislation.

6. The ability to allow prescribed grazing for vegetation management and has been used successfully for specific purposes, and has been used successfully in various national wildlife refuges within the Central Valley. In addition, the elk populations are allowed to expand within this alternative. Such expansion into other suitable habitat within the planning areas is appropriate.

7. I am surprised that the DEIS does not include any assessment of effects of the alternatives related to climate change. I would propose that Alternative F would also be most consistent with objectives for reducing climate change because it would 1) reduce the number of cattle on site, and 2) provide additional recreation opportunities proximate to a population center, thereby reducing long-distance travel to the Sierra Nevada.

Sincerely, Karen E. Leye, Ph.D.

#7418

Name: Weiner, Joan

Correspondence: Since we are only allowed to pick from the different official alternatives, my choice is Alternative A. While I did like some of the ideas for the elk and the general public offered in Alternative F, getting rid of the ranchers is too extreme.

#7419

Name: Kelly, Gina

Correspondence: Dear NPS and melanie\_gunn@nps.gov,

I support Alternative F, phasing out cattle and dairy industry and returning the land to its natural state. The enabling legislation of the National Seashore supports wildlife protection and does not mention upholding private industry. The original leases to ranchers were to be 25 years. Ranchers have already been paid handsomely for their land, so it is long overdue to phase out the ranches. "Cultural Resource" and "Historic" does not mean industry needs to be currently in operation. Private business has no place on public land. Allowing industry and ranches to diversify their business is a bad idea. Already these ranches have been negatively impacting the land, mismanaged to allow soil erosion, scarring in the landscape, e.coli contamination in waterways and more. If you allow EVEN MORE agricultural practices on the seashore, there is no way to know the impact and there is no historical evidence you will be able to manage any negative impacts on the environment. Tule Elk should be protected for the survival of their species. They have already gone through a huge genetic bottle neck when they were almost completely wiped out except for 20 individuals. Every gene allele is important for the long term sustainability of the herd. The National Park should be protecting all Tule Elk, and allowing new herds to form and to TAKE DOWN THE FENCE at Pierce Point and allow all Tule Elk to roam free. I do not support granting 20 year leases to cattle and dairy industry. Climate science has indicated we have less than 12 years to mitigate the worst of climate catastrophe. Allowing business that has been linked to water pollution, species extinction and in Point Reyes is the culprit of over 60% of the greenhouse gas emissions, it is not a good idea to give that same industry a 20-year lease to continue degrading our national park. Point Reyes is a refuge to thousands of plants and animals. Point Reyes can be a leader in the fight for climate justice, and it starts with phasing out Beef and Dairy operations and restoring the land to its natural state. The EIS has NO MENTION of the effects of climate change in it, and does not include any information of the cattle and dairy's impact on climate change within the park. Please include my comment in the draft plan.

Thank you,

Mrs. Gina Kelly

#7420

Name: De Leon, Israel

Correspondence: As a member of the California-based international animal protection nonprofit organization In Defense of Animals with over 250,000 supporters, I oppose the National Park Service plan to kill native Tule elk, grow commercial crops, and permit ranchers to add chickens, turkeys, sheep, pigs, and goats to their exploitative operations. For this reason, I support Alternative F.

As national park land, this property was specifically set aside to protect, restore, and preserve the natural environment including the wild animals who live there. The original intention was to phase out dairy and cattle ranching, not add more crops or animals to increase ranching profits.

The proposed plan does not address the damage from grazing, including water-quality degradation and soil erosion. Also, adding new crops will create more conflicts with native wild animals.

Please abandon this inhumane and destructive plan by selecting Alternative F. I urge you to restore the Seashore's Pastoral Zone for wild animal habitat and repurpose historic ranch buildings for scientific research, interpretation, and public education.

#7421

Name: Ivy, Maureen

Correspondence: I am writing to urge you to fulfill the National Park Service's mission of preserving the habitats and wildlife of the Point Reyes National Seashore and to end the destructive ranching which is currently degrading our public land. PRNS badly needs improvement of its streams, grasslands, and other habitats. Natural resources are suffering because of the presence of ranching at PRNS.

Tule elk belong here. As natural inhabitants of the PRNS they require our protection. They do not deserve to be penned, nor to die agonizing deaths because we deprive them of water, and they certainly do not deserve to be shot. Our public lands are created to preserve and protect the land and its wildlife, not to ensure the financial interests of ranchers.

We had a deal. The heroes of our community, the group of local citizens who joined efforts with their allies in Washington, worked hard to designate the PRNS and to preserve this Seashore from ruin.

They understood that cows and cattle are not compatible with the mission of protecting our national parks and they made a generous deal. The ranchers were given decades to cease operation and to hopefully clean up the destruction they've created. Instead, the expired lease holders want to renege on the deal.

Visitors come here to see elk. No one travels here to see the ranches' junked cars, pollution, erosion, veal factories, or to witness the suffering and misery they inflict on the farm animals.

We don't create public lands so that a small group can profit from its misuse, steal our precious water, introduce weeds, crumble roads, and decimate wildlife. Ranches don't belong at PRNS. Their legacy of is one of degradation and destruction which they expect taxpayers to mitigate.

We had a deal when PRNS was created, to protect this precious land and the wildlife who inhabit it and to end destructive ranching. Let's muster integrity, stick to our deal, and fulfill the Park Service's mission.

#7422

Name: Swatland , David

Correspondence: Cattle grazing destroys the land & pollutes the water. The law requires Pt. Reyes National Seashore be protected from the impacts of cattle grazing. Time for NPS to follow the law!

#7423

Name: Stanziano, Lisa

Correspondence: The NPS EIS study, "Pt. Reyes and North District of Golden Gate GMP Amendment Draft EIS" clearly indicates that phasing out ranching is the best way forward for the environment (addressing soil, water, vegetation, wildlife, and air). The only responsible plan option must be Alternative F.

-Alternative F is the only plan does not allow dairy and ranching leases to be subsidized by tax-payer funds. If these leases are allowed, the subjectivity of management activity standards and the feasibility of oversight is in reasonable question. Questions about specific objectives arise related to the following points from APPENDIX D: MANAGEMENT ACTIVITY STANDARDS AND MITIGATION MEASURES: "When developing and implementing projects, NPS would follow these principles to avoid or minimize the potential for adverse impacts: -Ground and vegetation disturbance would not exceed the minimum area necessary to complete the project. Removal of native trees and shrubs would be minimized and only occur when necessary to meet project objectives. [SUBJECTIVE: who will determine definitions of "minimum area necessary" and "necessary to meet project objectives"?)

-Site-specific design plans would show the maximum extent of grading and would include requirements to protect sensitive environmental resources during construction and maintenance activities, including sediment control measures. [QUESTION: Who will develop these plans?]

-Planning would consider methods available to achieve objectives and use the method(s) least disruptive to the habitat of endangered or sensitive species. If sensitive habitats or species near to proposed work must be avoided, the area would be flagged and/or an NPS representative would be present onsite to denote sensitive resources. The parties implementing the project would avoid all NPS-delineated sensitive resources. [COMMENT: The logic of Plan B to cull elk from the Drakes Bay herd is counter to "least disruptive to sensitive species" The notion that 120 elk will do less "damage" to ranching resources than 124 elk, and that killing 4 elk as a productive measure is ludicrous and not based in science.]

-As needed, ranchers would seek technical assistance from the local USDA, NRCS, or Resource Conservation District offices because the relevant practices needed at a given ranch depend on project layout, topography, soil types, and other factors. [QUESTION: Who defines "as needed"?

-The NPS had set a goal of a 25 percent reduction of 2008 GHG levels from agriculture by 2016. There have not been updates since 2010 to determine if they reached this goal. The EIS Executive Summary states that "While emissions of criteria pollutants and greenhouse gasses would vary among the alternatives, these emissions would continue to be a small contributor to overall impacts when compared to emission sources and transport of emissions from outside the planning area." This statement does not reflect the fact that in 2008, Greenhouse gas (GHG) emissions within Point Reyes National Seashore totaled 20,239 metric tons of carbon dioxide equivalent ("MTCO<sub>2</sub>E"). Of this, 12,533 MTCO<sub>2</sub>E was budgeted to agricultural operations in the seashore-62 percent of the Point Reyes greenhouse gas budget in 2008. As the planning for the future of the National Seashore continues, an updated assessment of GHG and current mitigation measures is needed to determine how cattle operations can best achieve reductions; whether they are achieving reductions and to what extent the ranches in the Point Reyes, and beyond, are able to achieve carbon neutral or carbon negative operations. One way to ensure a decrease in carbon emissions-without the expense of updated assessments of GHG is to remove cattle from these open spaces and focus on restoration to native, perennial prairies and woody vegetation, which studies show sequester more carbon than the European grasses that have replaced native grasses in the Point Reyes National Seashore's Pastoral Zone. [Sources: Kane, D. (2015). "Carbon Sequestration Potential on Agricultural Lands: A Review of Current Science and Available Practices." National Sustainable Agriculture Coalition (NSAC) and Breakthrough

Strategies and Solutions, LLC. Washington, D.C. Accessed:

[http://sustainableagriculture.net/wpcontent/uploads/2015/12/Soil\\_C\\_review\\_Kane\\_Dec\\_4-final-v4.pdf](http://sustainableagriculture.net/wpcontent/uploads/2015/12/Soil_C_review_Kane_Dec_4-final-v4.pdf) National Park Service. (2010). CLIMATEfriendly PARKS, Point Reyes National Seashore Action Plan. Point Reyes National Seashore, Point Reyes, California. <http://cesanluisobispo.ucanr.edu/files/136179.pdf>] The only acceptable alternative that addresses the elimination of greenhouse gases is phasing out cattle and dairy ranches.

-By allowing ranches to expand the damaging commercial use of the park lands - the NPS preferred alternative plan (B) is in direct contradiction to its charter. Alternative B calls for the introduction of chickens, pigs, sheep and goats. Plan B states “no predator management would be allowed,” but it is naive to think there won’t be conflict between these livestock and the wild predators in the park. The history of livestock agriculture in California and the West in general is that of devastation of wolves, mountain lions and other species via depredation permits (not to mention the toll of poisons and traps and non-agency, vigilante predator removal.) The science regarding the disruptive consequences of predator removal to ecosystems’ health is clear and the park is sliding down the slippery slope of killing wildlife to protect private profit.

Alternative F is the ONLY environmentally responsible, just alternative for the management of Pt. Reyes National Seashore (for all of us) because...

1. Alternative F is the only plan that reduces documented harmful environmental effects of animal grazing and dairy farming. Alternative F is the obvious choice for the NPS to uphold its duty Animal grazing damages grasslands, birds, native plants and wildlife; grazing pollution affects freshwater and marine habitats; and produces methane and other greenhouse gas emissions that contribute to the climate crisis. The 2019 United Nations report on climate change points to dangerously high temperatures, drought, and extreme weather events and calls for reforming agricultural practices, specifically reducing cattle. (NOTE: exceptions could be considered for the two reserved-life-estates: Percy and Commonweal/Niman, which are located outside the range of the Drake’s Bay elk herd.)

2. Alternative F is the only alternative that does not subsidize private commercial interests at tax-payer expense AND is the best alternative for preserving the environment for future generations. The proposed zoning framework-the “Ranchland Zone”-would allow one-third of the parkland in question, which is public land, to be used for private enterprise and subsidized at public expense. The NPS granted the right to continue living and working on formerly owned, now NPS property for 25 years. The time to return those public lands to the park is long overdue. I question how the NPS can prefer a plan (B) that allows ranching to continue past 50 years at tax-payer expense (through subsidies) without a public vote to do so when the EIS (study) indicates that phasing out ranching is the best way to preserve every aspect of the environment (land and wildlife) for the enjoyment by visitors of the park.

3. Alternative F is the only plan that fulfills the mission of the NPS to conserve native species and restore ecosystems. To limit to an arbitrary number of 120 and kill those beyond that number is counter to that mission. Letting elk roam free is critical to their survival. More than half the elk in the Tomales Point herd, which is fenced in on a peninsula to appease ranchers, died during a recent drought because of a lack of water and food. That is a failure to uphold the NPS mission and to adopt a plan to systematically kill even one elk to satisfy private interests that sold their land decades ago is preposterous. Rancher and dairy farmers sold their land to the NPS years ago with the understanding that they would have limited leases. The time to stop renewing public lands in the park is long overdue.

In conclusion, you must not ignore that the NPS Act and the Point Reyes Act direct the NPS to support the maximum protection, restoration, and preservation of the natural environment within Point Reyes National Seashore. But under all the alternative management plans except for Plan F, cattle, not wildlife, are given priority status at the Seashore. Point Reyes National Seashore is the only national park where Tule elk live. To ensure forage for private cattle, most of the elk are confined behind at fence at Tomales Point. Native to California, the elk were reintroduced to the park in 1978. Once numerous on Point Reyes peninsula, they had been extirpated by early settlers and were believed to be extinct. Point Reyes Seashore is a success story in wildlife recovery. All of the

Alternative plans in the EIS except for Alternative F are in direct opposition to that success, the purpose of the NPS, the NPS Act, and the Point Reyes Act.

I urge the decision makers for this management plan to choose Alternative F: stand up for the preservation of park land that all citizens can enjoy, not for the profit of a few private enterprises that have been well compensated over many years. To choose any other plan is egregiously irresponsible to the legacy of the NPS and the true historic value of Pt. Reyes National Seashore.

Yours sincerely, Lisa Stanziano

#7424

Name: N/A, N/A

Correspondence: It is essential to keep NPS lands true to their natural environment. Any plan to disturb or detract from that is unacceptable. In this case, the elk that live in the NPS lands should be protected rather than eradicated simply to expand land for farmers. There is much land in the north bay (e.g. Marin Land Trust) which allows for cattle farmers to utilize the space for grazing.

Please do not destroy our precious natural habitat and it's resident species!

#7425

Name: Jones, Gwen

Correspondence: Hi, I grew up in West Marin and visit the PRNS frequently, still. I do not want to see a native species destroyed in order to provide cheaper, more plentiful feed for ranchers to make money off of. To even consider this, in Marin county fo all places, is absurd. Cows destroy the environment through corrosion and pollution. Please, do not kill the rule elk in PRNS in favor of rancher's profits!

#7426

Name: Morrison, Sarah

Correspondence: Please phase out ranching and give the land to the public and the animals.

#7427

Name: Pandapas, Laura

Correspondence: The only alternative that honors the intent and letter of the enabling legislation is Alternwrtive F. These lands belong to the public. We paid fair market value for all the ranches in the pastoral zone, and leases were extended that were ALWAYS intended to be finite. The ranchers were allowed to continue ranching for their lifetimes while giving their children the chance to continue in the case of some of the older ranchers. That's why the leases were capped. It was never intended that they could sell their businesses to other parties, nor was it intended that they could have an unlimited number of cattle. Any alternative that changes the management priorities of the PRNS to put cattle before elk and before the public is unacceptable. Fifteen ranching families should not be allowed to dictate what happens on national parkland that is supposed to be governed by the Organic Act. Expensive lawyers and compromised politicians shouldn't be able to change the enabling legislation to somehow assert that cattle ranching is now a "value" to be protected. It was ALWAYS intended to be phased out and that the Seashore would be restored once the ranching faded. It's too bad Jared Huffman wouldn't actually provide some leadership to get an alternative that honors the mandate to protect the PRNS and its wildlife to leave both unimpaired for future generations. This one is going to be Jared's shame for the rest of his career. The ranching, if allowed to continue at all, should be modified to fit within the special setting that is the PRNS, not the other way around.



#7428

Name: Spear, Jonathan

Correspondence: In the EIS, you fail to address just how foul the odor of cow manure is at the Pt. Reyes National Seashore.

In my own trips through the park, I have observed that dairy and beef ranching operations contaminate the air with badly smelling gases and particulates. Allowing this pollution, due to an excessive number of cows (who are not naturally suited to the ecosystem of the park) is negligent. The NPS is supposed to safeguard the ecosystem of the park.

While my own statement, that "the air in the park stinks of cow manure," is not quantitative, it is a valid bit of evidence. Humans evolved with a keen sense of smell, and odors that we qualitatively perceive as being offensive (such as bovine feces) usually are harmful to both human and other wild life. Cow manure emits harmful gases such as hydrogen sulfide, methane, and ammonia, and it also festers dangerous pathogens such as e. coli, listeria, and salmonella.

Dairy and beef ranching industries within the park already operate at an unreasonable and unsustainable level. Tons of feed are brought into the park for the cows, and many tons of excess manure exceed the capacity of the ranches for sustainable composting. The excess cow manure contaminates the ground water in the park, and runoff of sprayed manure also poisons the seashore.

The only sensible proposed plan is Alternative F, which ends the commercial ranching operations. It is your duty to restore and safeguard life within the park.

#7429

Name: N/A, N/A

Correspondence: We need to stop cattle farming and protect the tule elk. Cattle farming and grazing is not only hurting the elk but hurting our environment.

#7430

Name: van Kriedt , Michelle

Correspondence: The National Seashore is not for for-profit cattle ranchers, it's for wildlife and the public. Please honor the intention. Please do not support personal gain over the public good.

#7431

Name: N/A, Nuala

Correspondence: I am 15 years-old and have lived in the Point Reyes area my whole life. I grew up hiking, going to the beaches, and looking at Point Reyes's wildlife. I love all the animals here, but the elk are one of my favorites. Many other people agree. Elk are a huge tourist attraction in Point Reyes. People come from all over to look at them. Numerous times while hiking, I've seen groups of tourists exclaiming over elk herds and pulling over to take pictures.

If the Park allows the ranchers to kill the elk, open their ranches to other farm animals, and bring in crops, Point Reyes will lose most of what is special about it. Places like Sonoma are covered in vineyards and farms with cattle, chickens, and other animals. Opening the Point Reyes ranches to this kind of stuff will not only permanently harm the National Park land, but it will make Point Reyes into Sonoma County. Point Reyes is too special to allow private ranches to change it. Point Reyes will probably lose much of the respect for its beauty and remarkable landscape if that mistake is made.

Thank you.

#7432

Name: Johnson, Roberta

Correspondence: Public lands are for the public, not for privately owned ranches. They destroy wilderness areas. Please keep cattle off off our public lands.

#7433

Name: Likover, Laura

Correspondence: I feel that we should have native animals in our parks, not cattle for ranchers. I believe this is a substantive comments as before the advent of cattle, the elk were the only large grazing animals utilizing the park area. To kill the native animals so that private ranchers can make more money is crazy.

#7434

Name: garcia, erin

Correspondence: Hello,

I am writing to urge the National Park Service to discontinue the grazing of beef and dairy cattle at Point Reyes National Seashore. This precious area has been damaged by livestock grazing which poses a threat to the environment and local wildlife and it should be protected and used to serve the public good, and not for the benefit of the livestock industry.

I strongly oppose Option B and any other proposal that would be fatal to Tule Elk or other wildlife to the benefit of ranching operations, and encourage the agency to adopt Option F to discontinue grazing and allow members of the public to enjoy this beautiful park and to be enriched with opportunities to visit and appreciate this special place.

#7435

Name: Gogan, Peter

Correspondence: I read with astonishment that the National Park Service (NPS) preferred alternative for management of Point Reyes National Seashores pastoral zone includes limiting the Drakes Beach herd of tule elk to 120 adults by direct lethal removal for the following reasons: 1. ELK IMPACT ON PASTORAL LANDS - The Management Plan Draft EIS states on page 82 that, Competition for forage between elk and cattle is possible if they occur together in the same space and time and limited forage is available. However, no evidence of competition between tule elk and livestock is presented to support this statement. In fact, the Draft EIS uses the lack of competition for forage between elk and livestock to justify allowing additional types of livestock in the pastoral zone. The Draft EIS goes on to cite on page 83 ongoing data analyses indicating that, density-dependence had a measurable effect on herd growth at Drakes Beach despite the herd not being confined in any way. Why does the NPS propose to expend valuable time and resources initiating a continuous long-term effort to control a population of elk that is showing signs of density-dependent self-regulation? The Management Plan Draft EIS states that most of the issues resulting from the presence of elk in the pastoral zone involve damage to fencing and possibly water pipes. These issues can be resolved on a long-term basis with various alternate fencing designs and construction. 2. GENETIC CONSERVATION - The Management Plan Draft EIS also states on page 83 that, Point Reyes elk are believed to be among the most inbred in California, having lost an estimated 80% of their retained genetic variability. A recent study not cited in the Management Plan Draft EIS reported an inbreeding coefficient of 0.19 for elk at Point Reyes (Meredith et al. 2007:Table 2). A more recent paper by a researcher at the Smithsonian Institute and others states (Ralls et al. 2018:4) that,

If an isolated population has a known or inferred inbreeding coefficient of 0.1 or has lost 10% or more of its genetic diversity (both readily estimated from genetic marker data sets such as microsatellites, or increasingly, genomewide DNA sequence-based analyses), it should be assumed to have genetic problems requiring management. An inbreeding level of 10% may sound like a low threshold for intervention, but in fact it represents a very considerable loss of fitness. Assuming an average of 6 diploid lethal equivalents per genome (likely an underestimate of the genetic load of an average naturally outbreeding species [Hedrick & Garcia-Dorado 2016]), an inbreeding level of 10% leads to a fitness reduction of 45% compared to a large population. For example, an inbreeding coefficient of 0.125 in wild red deer (*Cervus elaphus*) reduced lifetime breeding success (the gold standard of fitness measurement) by 82% in inbred females and 95% in inbred males compared to those with no inbreeding (Huisman et al. 2016). Further, as the rate of response to selection is proportional to additive genetic variation and approximately proportional to heterozygosity, a 10% increase in inbreeding will also result in an approximately 10% slower rate of adaptation to new selective pressures (Frankham 2015). This is not desirable because given the rapid rate of anthropogenic environmental change, species will need more, not less, ability to adapt.

Note that the inbreeding depression among elk at Point Reyes (0.19) is almost twice that of the level identified by the authors of having genetic problems (0.1) and greater than the example for red deer (the same species as elk) cited above (0.125). Given the potential severity of inbreeding in tule elk, the NPS should be making every effort to reduce the likelihood of inbreeding depression in the Drakes Beach herd rather than proposing to limit it to a relatively small number of breeding adults (120) where inbreeding depression is likely to be increased rather than reversed. The Management Plan Draft EIS inappropriately cites the California Department of Fish and Wildlife Elk Conservation and Management Plan (2018) statement that 100 is an acceptable minimal number for a tule elk herd. This statement is conditional of regular movement of tule elk between herds. Since the elk at Point Reyes are isolated from other elk herds, any movement of animals is dependent upon active management. The Management Plan Draft EIS identifies translocation of tule elk from other herds as a possible management alternative. Any such translocations should be completed prior to any reduction of numbers of elk in the Drakes Beach herd and only after confirmation that the translocation efforts have successfully reduced the level of inbreeding in the Drakes Beach herd. However, it is worth noting that the National Park Service has not initiated translocations to tule elk from elsewhere to Point Reyes in the 50-year existence of elk at Tomales Point.

## REFERENCES

California Department of Fish and Wildlife. 2018. Elk Conservation and Management Plan. Sacramento, California. 481 pp.

Frankham, R., J. D. Ballou, K. Ralls et al. 2017. Genetic management of fragmented animal and plant populations. Oxford University Press, Oxford, U.K.

Hedrick, P.W. & A. Garcia-Dorado. 2016. Understanding inbreeding depression, purging, and genetic rescue. *Trends in Ecology and Evolution* 31: 940-952.

Huisman, J., L.E.B Kruuk, P.A. Ellis et al. 2016. Inbreeding depression across the lifespan in a wild mammal population. *Proceedings of the National Academy of Sciences*. U. S. A., 113: 3585-3590.

#7436

Name: McLamb, Lynette

Correspondence: I do not support private grazing and farming on public lands. Pt Reyes belongs to all of us and cattle and dairy farming operations are very destructive to the environment, contribute to global warming, plus the raising of veal is inhumane.

Our precious and majestic Tule Elk should not be slaughtered so that private individuals can profit on our public lands.

I would like to see a restoration , not destruction on our public lands.

#7437

Name: Aguirre, Suzanne

Correspondence: Please save the Pt. Reyes Park. Don't allow the Slaughter of the elks. The last thing the world needs is more beef production.

#7438

Name: Crots, Kelly

Correspondence: Too many cows cause erosion and excess manure that spoils the park and this will be worse with longer leases and expanded users. Alternative F.

#7439

Name: Seligman, Adam

Correspondence: I'd like people to say they support alternative F, the only alternative that phases out ranches and restores the land to what it was bought and paid to be - a national park dedicated to wildlife protection. Cattle grazing is harmful to the environment in so many ways, and this space is for the native residents, the Tule Elk. We hike extensively in Pt Reyes and I appreciate being able to observe the native animals. We have plenty of cattle ranches across Marin County.

#7440

Name: Homenko, Deborah

Correspondence: I grew up in m Marin and still visit often. The national parks should be for preserving the natural world, not maintaining cattle, which bring nothing positive to anyone but the ranchers.

#7441

Name: Manviller, Jason

Correspondence: I care about protecting California's wildlife. I oppose the National Park Service's plan to kill native tule elk and expand commercial agriculture in Point Reyes National Seashore and Golden Gate National Recreation Area. I urge the National Park Service to instead restore the lands for wild animal habitat.

We should prioritize the preservation of our public lands and wildlife, not the economic interests of private ranchers. These commercial cattle ranches have serious negative environmental impacts on the park - polluting waterways, causing soil erosion, and harming the many endangered and threatened animals who live on Point Reyes. National parks exist to protect our natural resources and native wildlife. This park should be managed accordingly.

#7442

Name: Anderson, Dante

Correspondence: Please do not remove the elk. Thank you. Dante Anderson

#7443

Name: Carder, Stacey

Correspondence: Save the tule elk-do not expand cattle ranching.

#7444

Name: N/A, N/A

Correspondence: Public land should not be used for private industry. The National Seashore supports wildlife protection. The land should be used to protect the Tule Elk and their survival, and returning the land to its natural state, NOT to support private cattle and dairy ranching that negatively impacts the environment.

#7445

Name: Burnham, Douglas

Correspondence: Dear National Park Service,

I am writing today to express my strong support for "Alternative F" as outlined within the General Management Plan Amendment Draft Environmental Impact Statement for Point Reyes National Seashore and the North District of Golden Gate National Recreation Area. Barring "Alternative F", my secondary preference is for "Alternative E".

I am deeply opposed to any and all of the alternatives that contemplate reduction, lethal management, or removal of any existing or new Tule Elk herds within the area under consideration.

The reason for my position is simple: I am approaching the questions under consideration in the current EIS within the broader land use and ecological context of the greater Bay Area.

It is undeniable that:

A) There currently exist, elsewhere in California, many ranch lands of comparable quality and character to those found within the NPS-controlled lands under discussion within this EIS; B) The amount of ranching activity occurring on the NPS-controlled lands under consideration is fairly modest (i.e. impacts to ranching on these lands do not negatively impact the people or economy of the region as a whole); C) That the current Tule Elk population is at roughly 1% of its pre-colonial levels; that therefore D) Opportunities for Californians to observe Tule Elk are extremely limited; and most importantly that E) Tule Elk are a significant missing link in the deeply damaged ecology of California's coastal ecosystems

Given the above, it seems unconscionable that Tule Elk populations should be either numerically reduced, or made more difficult to observe, within the approximately 30,000 acres of NPS-controlled land under discussion on behalf of a land use (ranching) which by most estimates occupies almost 40,000,000 acres of land in the state of California.

While I applaud the National Park Service's ethos of historical preservation, and their efforts to model the harmonious integration of human and natural use, it seems clear that in this case the needs of the very fragile Tule Elk population should be put before the needs of any individual or particular members of a group (ranchers) that is, on the whole, over-dominant within the larger framework of Californian land use.

Instead, the NPS should take this opportunity to send a clear message that it prioritizes the re-wilding of the public lands under its control, and the rehabilitation of species and ecosystems damaged by human activities.

The Alternatives that serve the broad public interest to the greatest degree are in this case those which expand access to (and the health of) a scant natural resource (Tule Elk) - that is to say Alternative F, or less-so, Alternative E - though this may cause some amount of economic distress to the particular ranchers whose operations occur within the EIS area.

Thank you for your attention to this matter; I sincerely hope that your group will take action to protect the continued re-habilitation of one of California's many unique native species.

Sincerely,

Douglas Burnham CA Architect #C25383

#7446

Name: van der Lee, Aniko

Correspondence: Native Tule elk are the true historic occupants of the Point Reyes peninsula. Cattle are not. Ranchers were paid well for their land in the 1960s and it was agreed that they would leave within 25 years, and yet, they are still there. Now, with the proposed General Management Plan Amendment, the NPS has proposed six alternatives, five of which include continued ranching activities. Alternative B, the NPS's "preferred alternative", not only allows for continued ranching activities, but it also promotes new agricultural activities such as planting artichokes or other row crops, and expanded ranching activities such as introducing sheep, goats, pigs or chickens. New row crops will attract birds and expanded ranching will attract native predators. This is a recipe for more conflicts with native wildlife. And to top it all off, Alternative B includes the lethal removal of Tule Elk in order to limit the Drakes Bay herd to 120 adults. Your preferred alternative allows for more than 5,000 cattle to graze, and even provides for expanded ranching activities, and yet you have determined that the same land can only sustain 120 Elk. It's hard to look at these proposals and see the NPS as impartial in these matters. You appear to be kowtowing to the ranchers and have lost sight of your mission under the Point Reyes Act: to manage the Point Reyes National Seashore for "maximum protection, restoration, and preservation of the natural environment." There is no mandate for prioritizing commercial agricultural leases on these public lands. Cattle ranching should only be allowed if it's consistent with preserving the natural environment and should be required to accommodate native wildlife - not the other way around.

#7447

Name: Murray, Elizabeth

Correspondence: I unequivocally support sustainable farming and ranching in these areas. I support Alternative B. Thank you.

#7448

Name: Spaletta, N/A

Correspondence: Dear Superintendent Muldoon,

Our family appreciates the opportunity to comment on the General Management Plan Amendment Draft Environmental Impact Statement (DEIS).

We would like to show support for the comment letter submitted by the Point Reyes Seashore Ranchers Association (PRSRA) and the comment letter written together by the the Lunny, Grossi, McIssac, Rogers, and Percy ranching families. These two letters cover our concerns with the DEIS. The purpose of our comment letter is to provide a history of our family farm and the impact from the growing Tule elk herd at Drakes beach.

We appreciate the work which has gone into creating the DEIS; however, we feel our family's concerns and expertise were not considered in the DEIS. We have been communicating our concerns directly with NPS staff for almost 20 years when the first two elk showed up on our ranch. In the year 2000, we were utilizing best management practices for our soil, pasture, and herd health. The farm was running very smoothly and we were enjoying our partnership with NPS. This same year two elk showed up on our farm. They were collared and appeared very nervous. We knew from our experience with large animals, something was off. We reached out to local NPS staff and they said the two elk (both female) must have swam across the Limantour Estero. This seemed quite odd since our farm is not directly across Limantour. It also seemed a bit coincidental since years before, the park discontinued the lease to our neighbors at D ranch and left a large part of the land fallow. We were told to not worry and that the two elk cows would most likely swim back. In the late spring/early summer, one of the

cows calved and then in the fall a bull showed up with a third cow. During this time we were not aware of the 1998 Tule Elk Management Plan which stated that those animals which were collared were part of an experimental relocation herd and if they caused harm or damage they would be relocated.

The following year we expressed our concern regarding the increase of the herd size and were told not to worry since the cows were sterilized. The cows ended up being very fertile because they each calved growing the original 2 to a herd of 5. The following year, the new herd size grew to 7 elk. Our concerns began to grow and we asked if they had a plan for the herd and were told there wasn't anything they could do at the time. We were told that the herd would most likely swim back to Limantour and were reassured the herd size would not grow because they were going to sterilize the females.

In 2004, we started to experience negative impacts to our farm. The herd size was only 15, but we were unable to utilize best management practices for our pasture due to the elk herd destroying our temporary and permanent fencing. Fencing allows the pasture to rest preventing erosion, expansion of obnoxious weeds, and encourages a healthy ecosystem. Our irrigation system started experiencing damages from elk including broken aluminum pipes and our sprinkler. The system cleans out the winter holding ponds and pumps water and fertilizer onto the pasture. This helps promote the growth of perennial grasses and wild flowers. We approached the PRNS staff regarding elk fencing to keep the herd off the pasture land and prevent any further damages. The staff told us they would look into it.

The following year, the herd size grew to 21 and we were beginning to see the negative impact on the pasture land. The pasture was beginning to deteriorate due to the inability to keep the elk herd off the pasture when it needed to be rested. We started to notice bald spots in the field when we did not have cattle in the pasture at the time. The bald spots were turning into obnoxious weeds instead of perennial grasses. We then observed bull elk rooting up the soil and discovered this was the cause of the bald spots. The damages to the fencing, irrigation system, and pasture began to increase.

In 2007 we were told the PRNS was seeking funding for an elk fence and in 2008 we were shown an actual proposal. Please see attached. We were told the fence would be installed by 2010 and to be patient.

In 2010, the herd size grew to 57 from the original 2 and there still wasn't an erected elk fence. Our original superintendent Don Neubacher left the seashore and was replaced with Ms. Cicely Muldoon. Before Superintendent Neubacher departed, he assured us the problems we had been having with the growing elk herd would be fixed. Upon our first meeting with Superintendent Muldoon, we presented her with our concerns and an itemized list of damages and costs from the current year. At this time, the damages expanded to our cattle and loss of actual hay. The bull elk were now goring our cattle with their massive horns. The elk herd was now not only competing with our cattle for pasture (forage), they were competing with our cattle for hay. The result was purchasing additional feed to supplement for the loss of both pasture and hay.

We were told to be patient while Superintendent Muldoon became settled in her new position at PRNS and up to speed with our issues. PRNS staff didn't believe the elk were causing such damages and told us to continue to document the damages.

Since 2010, the damages have gotten much worse. The costs have increased greatly. For example, in 2010 the average cost of hay was \$150/ton. Today the cost is \$400/ton. We have had to reduce our herd size due to limits on milk production contracts with our milk buyer. Even though we have reduced the herd size, we are purchasing more hay. The increase in hay purchases is due not only to the loss of forage from the growing elk population on our farm; the elk are actually eating the hay. In most cases, the elk are pushing the cattle away from the hay during feeding. The DEIS is inaccurate stating this incident happens only on occasion (page 82). Most recently elk have gotten into our horse pen to feed on horse hay. Our baby colt was injured and needed stitches.

The DEIS estimating a maximum herd size of 120 elk as a healthy herd based on simulations of 1200 RDM is inaccurate and contradicts the 1998 Tule Elk Management Plan of 1400 RDM. The RDM requirements do not

have any actual field data and does not consider seasonality, changes in grazing practices and diversification. It is almost impossible to prevent the overgrazing of elk on pasture without proper fencing. During a few of our Organic inspections, our inspector mentioned the property looked overgrazed. They were shocked to know the pasture was not being used by cattle and that the damage to the top soil was from elk.

The NPS staff initiated hazing as a solution to prevent elk from foraging on permitted pasture land. Hazing is extremely ineffective and costly. The DEIS is inaccurate in stating it has been moderately successful. The elk are most active starting early evening through the early morning. They travel throughout the night, crossing over several fences to forage and drink water. The NPS staff haze the elk after they have bedded down in the morning while the elk are chewing their cud on weekdays (during normal business hours). The staff chase the elk around in circles resulting in the herd crashing through barbed wire fences resulting in unwanted stress to the elk and to the surrounding cattle. After the staff leave, the elk return the same evening to begin the same cycle. The hazing process is contradictory to NPS's mission of a free-ranging herd. The most cost effective and humane solution is an elk fence.

Since the Drake Beach Elk Herd first appeared, we have never requested the NPS to cull the elk. We have always requested the elk to be relocated to protect not only our farm, but our neighbors. We have one of the smallest operations in the PRNS and have the greatest impact of elk damages. We greatly depend on our pasture for grazing and fences to keep our cattle in specific areas. The fences are necessary to keep the cattle & public safe; they help prevent erosion and encourage a healthy ecosystem.

Our family farm not only supports four generations of families, we have employees and their families which depend on us. It is necessary to keep the farm viable and sustainable. We have always been proud of our operation and have strived to be excellent stewards of the land. It is our mission to continue the family legacy and pass down the traditions of farming to the next generation.

We ask the NPS to consider a fencing solution which would ensure the separation of the free-range elk and the permitted lands in the PRNS. This is the only feasible solution for our family farm to continue.

Sincerely,

Ernie, Nichola, & Ernest Spaletta Rebecca Spaletta-Ahlers

Spaletta Dairy Historic 'C' & 'D' Ranch

#7449

Name: Louaillier, Mike

Correspondence: I am writing to urge the National Park Service to discontinue the grazing of beef and dairy cattle at Point Reyes National Seashore. The farm industry will soon be shrinking due to new meat alternatives, so it will not be necessary for them to have such access to NPS land.

#7450

Name: Dunlap, Catherine

Correspondence: I remember visiting Point Reyes as a child and very much enjoying the ranching and farming experiences there. They are part of the park. A promise was made when the park was founded that agriculture would remain part of the experience. Incompetent park managers have failed to keep the elk in their controlled areas and have caused large numbers to die. The numbers must be managed and their range controlled. They can coexist. It's clear that park management has created this situation to influence public opinion. Agriculture should be close to populated areas so that the public can know and understand how the food is produced. It's a wonderful education for the children and adults.



#7451

Name: Klein, Carolyn

Correspondence: I support keeping the grasslands in place for the Tule Elk and do not support the expansion of ranchers' rights to these lands.

#7452

Name: Grossi, Dominic

Correspondence: Cicely Muldoon Superintendent Point Reyes National Seashore 1 Bear Valley Road Point Reyes Station, CA 94956 Re: Draft Environmental Impact Statement for Point Reyes National Seashore General Management Plan Amendment

Dear Superintendent Muldoon: Please select the preferred alternative, "Alternative B" for the future of ranching in the Point Reyes National Seashore. I support agriculture in the Seashore and think it is a vital part of the region's history, culture, and current economy. I appreciate the time and effort that has gone into researching all options for the draft EIS. I support 20-year leases, the ability for farmers and ranchers to succession plan, and the opportunity for farms and ranches to diversify their operations to viability and sustainability adapt their operations for generations to come. I wish that the diversification was not so limited in scope or size, 2.5 acres around structures in ranch core with no irrigation and other restrictions is cumbersome. In addition, the draft EIS would have been more complete if research was done on an option that includes an Elk Fence between the agriculture and wilderness area or Elk relocation to the wilderness area. Agriculture is a partner in natural resource conservation and preserving open spaces. Many of the beautiful natural landscapes in the US near large urban areas are preserved because agriculture was there first to curb development. Agriculture and nature do co-exist, I support the farmers and ranchers in the Seashore for their part in providing for the local food shed in a sustainable way. Agriculture plays an important role in combating Climate Change by providing local food and carbon and greenhouse gas drawdown. Agriculture is important to me in the Point Reyes National Seashore, the preferred alternative B is the best option from the draft EIS Thank you Dominic Grossi

#7453

Name: Miller, Vicky

Correspondence: Living in United States affords me some of the wonderful opportunities to visit the natural wonders of this country. What I find distressing is that the current administration Washington DC wants to obliterate wildlife off face of the earth. Every living being provides a purpose and contributes to the ecosystem. Please don't kill any wildlife.

#7454

Name: van der Lee, Aniko

Correspondence: Native Tule elk are the true historic occupants of the Point Reyes peninsula. Cattle are not. Ranchers were paid well for their land in the 1960s and it was agreed that they would leave within 25 years, and yet, they are still there. Now, with the proposed General Management Plan Amendment, the NPS has proposed six alternatives, five of which include continued ranching activities. Alternative B, the NPS's "preferred alternative", not only allows for continued ranching activities, but it also promotes new agricultural activities such as planting artichokes or other row crops, and expanded ranching activities such as introducing sheep, goats, pigs or chickens. New row crops will attract birds and expanded ranching will attract native predators. This is a recipe for more conflicts with native wildlife. And to top it all off, Alternative B includes the lethal removal of Tule Elk in order to limit the Drakes Bay herd to 120 adults. Your preferred alternative allows for more than 5,000 cattle to graze, and even provides for expanded ranching activities, and yet you have determined that the same land can only sustain 120 Elk. It's hard to look at these proposals and see the NPS as impartial in these matters. You appear to be kowtowing to the ranchers and have lost sight of your mission under the Point Reyes Act: to manage the Point Reyes National Seashore for "maximum protection, restoration, and preservation of the natural

environment." There is no mandate for prioritizing commercial agricultural leases on these public lands. Cattle ranching should only be allowed if it's consistent with preserving the natural environment and should be required to accommodate native wildlife - not the other way around.

#7455

Name: Porzig, Elizabeth

Correspondence: 23 September 2019

To Whom It May Concern:

Herein we submit a letter of comment from Point Blue Conservation Science on the draft Environmental Impact Statement for the General Management Plan Amendment and associated summary.

Point Blue Conservation Science (Point Blue; [www.pointblue.org](http://www.pointblue.org)) works to conserve birds, other wildlife and ecosystems through science, partnership, and outreach. With a staff of 150 scientists, we partner with public and private natural resource managers on land and at-sea in California, across the Americas, and in Antarctica. In addition to our extensive work on public lands, we collaborate with more than 1,000 ranchers, farmers and others who manage over 400,000 hectares of working lands across California. Founded in 1965 as Point Reyes Bird Observatory, our organization's beginning was made possible through a partnership with Point Reyes National Seashore, who we continue to partner with today. Then and now, we are grateful to the park for their continued commitment to the study and conservation of natural resources.

We read with interest the draft Environmental Impact Statement (EIS) for the General Management Plan Amendment (GMPA) for the Point Reyes National Seashore and North District of the Golden Gate National Recreation Area (hereafter collectively "the park"). We appreciate the tremendous amount of effort that has gone into producing and evaluating the six alternatives. Given the strong public opinion on the issues at hand, we recognize the challenges the National Park Service faces in meeting multiple objectives and balancing multiple resource concerns, and we express support of the effort to address these complex issues. In this letter, we do not advocate for any one of the six individual alternatives, and we recognize that the park may select a final amendment that combines elements from multiple alternatives. With Point Blue's long history of collecting data within the park, and in California rangelands and coastal ecosystems more broadly, we instead offer considerations and recommendations on some of the specific elements of the six alternatives:

- **Habitat disturbance, biodiversity, and resilience.** In the absence of fire or other major disturbances to the landscape, grazing by livestock and/or by elk plays an important role in keeping grassland and coastal prairie habitats abundant in the park. If the grazing intensity and/or spatial distribution is reduced in the park, we recommend the park consider the long-term effects of the conversion of grassland and coastal prairie habitats to dense coastal scrub and/or forest, a process the park mentions is likely to occur and would have ecological winners and losers. We have conducted long-term monitoring of the effects of such a conversion at the Palomarin Field Station at the south end of the park, in an area that was partially in agriculture and grazing prior to becoming part of the park. We have documented extensive conversion of that area from open coastal scrub to Douglas-fir forest, resulting in considerable changes to the composition of the local bird community, including the local decline or loss of species associated with coastal scrub and prairies (Porzig et al. 2014). Regardless of the alternative that is selected, maintaining a heterogeneous landscape with a diversity of vegetation types is likely to maintain the greatest biodiversity, ecological function, and resilience to climate change and other threats (Folke et al. 2004).
- **Grazing as a tool for targeted ecological management.** Managed or prescribed grazing can be used to achieve specific resource-management objectives such as creating and maintaining habitat for sensitive species and maintaining desirable plant assemblages. A 2010 study Point Blue conducted on grassland birds in coastal prairies in Sonoma County found that sites that were continuously grazed by cattle supported a greater diversity and abundance of grassland bird species than sites where livestock grazing had ceased (DiGaudio 2010). Hayes and

Holl (2003) found that grazed coastal prairies supported higher native annual-forb species richness than ungrazed coastal prairies; and Henneman et al. (2014) found that native bunchgrass presence increased following prescribed rotational grazing. Within the park, grazing has been demonstrated to maintain native grasses and forbs in the presence of introduced plant species (Arceo et al. 2017). Under all ranching scenarios, we encourage the park to work with agricultural producers to establish biodiversity goals and have a shared understanding of the appropriate management actions for these areas, and manage for these goals in an adaptive framework.

- Application of subzones within the Ranchlands zone. We appreciate the inclusion of nuanced management subzones in Alternatives B-E. Poorly planned grazing in sensitive areas such as wetlands and riparian areas can negatively impact vegetation, erosion, and water quality, with subsequent impacts to bird abundance and diversity (RHJV 2004). Fencing riparian areas allows the park and its lessees to limit grazing access and control the timing, intensity, and duration of grazing within the riparian zone; and monitoring and adaptive management of the riparian zone can support this decision-making process. Additionally, active restoration of riparian-zone vegetation would provide multiple benefits to ecological function, including water quality improvement, erosion prevention, carbon sequestration, and habitat for wildlife (Dybala et al. 2019, Naiman et al. 2010).

- Nesting landbirds in silage. As cited in the draft EIS, Point Blue conducted a study in 2015-16 with the support of the park on the impacts of silage on breeding birds within the Point Reyes National Seashore. The study found that 7 bird species were either confirmed or likely nesting within the silage fields prior to when the fields were mowed, including 3 bird species of special concern (DiGaudio et al. 2016). This study also offered a number of management considerations for the park to review and weigh, although it was beyond the scope of the project or report to determine whether each consideration was compatible with park goals and ranching operations. If the park has not already done so, we recommend the park evaluate the efficacy of the management considerations summarized in the report from that study to determine if there are any appropriate actions that can be taken to reduce the impacts of silage harvesting on nesting birds.

- Modifying ranching practices to minimize food subsidies for Common Ravens. The park works on many levels to protect the federally-threatened Snowy Plover during the nesting season (e.g., seasonal closures, pet restrictions, public outreach, and practices to reduce impacts from ravens). Common Ravens remain the primary threat to Snowy Plovers within Point Reyes; they are also known to prey upon Common Murre nests. As mentioned in the draft EIS, the large Point Reyes raven population is supported by the abundant food resources accessible at some park ranches. Management actions that control ravens' access to these resources may lead to a smaller raven population size, thereby reducing their impact on vulnerable avian species like the Snowy Plover (Roth et al. 1999). Under any ranching scenario, we recommend the park consider actions, many of which are outlined by the park in the draft EIS, that would reduce the subsidization of Common Ravens, resulting in benefits to plovers and other species upon which ravens prey.

- Long-term perspective on Tule elk management. We appreciate the park's efforts to reintroduce and maintain a population of a large California endemic species that had been extirpated. Tule elk play an important role in the ecology of the Point Reyes National Seashore, and the opportunity for users of the park to observe and appreciate these animals in the wild is valuable. We recognize that managing a wildlife population is complex, and that under any of the alternatives, including alternative F over the long-term, the park may be required to actively manage the elk population size. In the absence of a large population of predators, the elk population is likely to continue growing, increasing the potential for dangerous interactions with park visitors and on roads (both within and beyond the park), in addition to potential conflicts with other park resources. Given the strong public opinion on population management, we encourage the park to communicate frequently and openly about population management decisions.

- Climate change. We recommend the park's decisions on any of the alternatives, or individual elements of the alternatives, are made in the context of climate change. Climate change is already affecting, and will continue to affect, the ecology of Point Reyes over the long-term. For instance, bird populations are already impacted by mismatches in phenology and impacts on reproductive success and survival during critical life stages (Dybala et al. 2013, Nur et al. 2018). In addition, range managers will be increasingly challenged by extreme and variable

weather conditions. The park can take actions now to help ensure wildlife and human communities are equipped to contend with these challenges, such as by undertaking restoration projects and other management activities that will improve ecological function, minimize the impacts of other ecological stressors, and maximize resilience.

In summary, we recommend the park consider management actions that are data-driven, incorporate pre-existing and future long-term monitoring, are adaptive in nature, and reflect a long-term perspective that allows a diversity of habitats, native wildlife, and the human communities who rely on and appreciate the park to thrive. We recognize there are many different stakeholders that bring unique perspectives to the park's history and future, including Coast Miwok, and we encourage inclusive and collaborative management with those groups. We acknowledge the complexity of the management decisions at hand, and the value of producing a management plan amendment that aims to achieve multiple benefits for both ecological systems and human communities in a changing world. We thank the park for the opportunity to comment, and we look forward to our continued partnership.

Sincerely,

Elizabeth Porzig, PhD Working Lands Group Director Point Blue Conservation Science 3820 Cypress Drive #11  
Petaluma CA, 94954

#### Literature Cited

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#7456

Name: Stalker, Julia

Correspondence: According to section 1.4.7 of the NPS Management Policies, 2006 (Decision-making requirements to Identify and avoid Impairments), the decision on a proposed action that could lead to an impairment of park resources and values must consider the impacts of the proposed action and determine that they will not lead to an impairment of the park resources and values. The action MUST NOT be approved if there would be an impairment.

I believe that the current DEIS is incomplete and not an adequate document to rely on to make such a decision without more research on the impacts to the natural resources and aesthetics caused by the agricultural activities and live stock within the Park.

The Park management is mandated to ensure the preservation and improvement of natural resources, processes, systems and values of units of the national park system in an unimpaired condition within the Park (now and into the future) and to identify and prevent unacceptable impacts and impairments to these resources.

I fully agree with and support the following comments on the General Management Plan Amendment Draft Environmental Impact Statement:

IMPACTS of diversification:

Remove all types of diversification from DEIS consideration and programmatic planning as the DEIS does not evaluate cumulative, direct or indirect impacts, connected actions, or reasonably foreseeable outcomes of diversification.

Impacts and conflicts with wildlife predation and interference with wildlife habitat by the introduction of sheep, goats, chickens, and pigs were not analyzed.

Impacts on roads and park infrastructure with increases in commercial traffic for farm-stays, processing centers, and retail sales, were not analyzed.

Impacts to visitor experiences and development of new trails and visitor uses by the introduction of immediate allowances for diversification were not analyzed.

Impacts to the scenic and historic values of the Seashore, as the ranch cores and historic pastures will be changed to support new uses, were not analyzed.

#### IMPACTS TO NATURAL RESOURCES:

Revise development of Ranchland Zoning so that it prioritizes holistic planning areas and resource protection buffers that are connected to sensitive resources, watersheds, and wilderness areas that are within and outside of the Planning Area.

The Ranchland Zoning also needs to consider future impacts from climate change including rising sea levels. To protect park resources these protections should be prioritized over ranching activities. Additional maps for the public should be developed that identify current restoration projects and sensitive water resources that are outside the Planning Area but are impacted by development within the Planning Area. Previous Seashore planning documents have analyzed climate change as a cumulative impact, this DEIS does not consider climate change impacts at all.

Require development of Ranch Operating Agreements (ROAs) to be evaluated as Resource Management Plans that consider all the foreseeable impacts on park resources before the issuance of the Final EIS. This may be accomplished with a supplemental update of the DEIS so that the current impacts of specific operations of beef and dairy ranching are analyzed and to the extent that current ranching operations impair park resources, those impairments should be cured.

Add a requirement for water quality testing for wilderness and all recreational bodies of water. The best available science on water quality in many areas of the DEIS are outdated by as much as 20 years. While NEPA does not require the Seashore to collect data prior to issuing a DEIS, the Seashore cannot adequately monitor mitigation measures and enforce ROA terms with seriously outdated data. Consequently, the NPS must test water quality both now, and on an ongoing basis in the future. Otherwise, the DEIS mitigation terms regarding water quality are empty promises to protect public resources.

Update maps to include locations of NPS and rancher restoration plans for water quality, special status species, and other important plant and animal communities. These maps need to be generated for the Seashore and should inform the development of the individual maps for Ranchland Zones to inform placement of Resource Protection Zones and Pasture Zones.

#### Succession Impacts:

To keep within the delegated authority and be consistent with the park's purpose, the Seashore must focus continuation of ranching on cultural and historical significance of multi-generational beef and dairy ranching and should not open ranching operations through competitive bidding process to the general public.

Opening the Seashore to outside operators would have significant impacts on the park's cultural and historic values. The DEIS fails to analyze these impacts, and even fails to provide enough detail about the RFP process to say what the impacts may entail, or when they may occur.

#### IMPACTS TO WILDERNESS

The DEIS excludes analysis of federally listed wildlife that utilize the unique habitat of Drakes Estero stating,

"Listed marine mammals (e.g. whales, seals, sea lions, sea turtles, and abalones) may use beaches adjacent to the planning area but are not included in this analysis because ranch activities would not affect these species in the planning area...elephant seals are found immediately adjacent to ranch lands...however, ranch operations do not affect them." (emphasis added)

This analysis fails to consider the cumulative and connected impacts of ranching activities that includes trampling, erosion, and nutrient deposits from storage and distribution of manure that flows into the creeks that drain to beaches, wetlands, and wilderness areas that are not in the planning area but are adjacent and connected by ecological functions or species movement to new areas.

The shoreline of Drakes Estero should have a 100-foot buffer from development and grazing activities, to protect sensitive resources and preserve wilderness values. The impacts of boat-in camping sites along the shores of Drakes Estero are not analyzed in the DEIS. Based on the 2012 Wilderness Designation of the estero marine system, camping site designations should be removed.

financial planning:

Provide the financial budget for implementation of the GMPA so that public can understand how the Seashore will implement the GMPA and ensure the plan is fully informed and well considered.

Tule Elk:

Eliminate culling of tule elk: Consistent with the Park's management goals and directives, NPS management of tule elk would occur only to support other resource protection needs and management goals. New herds would be allowed to continue, regardless of geographic location if they do not move outside Point Reyes. Authorized animal units for each ranch would be adjusted as needed to meet residual dry matter goals. Resource protection is the highest value for the Seashore as intended by Congress in requiring the Department of the Interior to administer its Point Reyes lands "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 USC Sec. 459c (6)(a) (emphasis added).

Thank you for the opportunity to comment.

#7457

Name: Field, Mason

Correspondence: As a concerned citizen of Marin, I urge you to consider all impacts the proposed changes would have on Point Reyes and its visitors. There are many reasons to believe the reporting was not thorough or served with unbiased intent.

In light of the thorough reporting done by the EAC committee, I have included the concerns I share with them.

- The DEIS exceeds NPS' discretionary authority by allowing for new agricultural uses to be developed.
- Opening the Seashore to outside operators would have significant impacts on the park's cultural and historic values. The DEIS fails to analyze these impacts, and even fails to provide enough detail about the RFP process to say what the impacts may entail, or when they may occur.
- It is impossible for the public to understand the complexity of NPS' decision-making process and NPS' responsibility to properly evaluate the cumulative impacts and connected actions of the ROAs and how the outcomes of mitigation measures on one property may be denigrated on another without updating the DEIS to include mapping and other information, as well as an appropriate evaluation of cumulative environmental impacts of all of these ROAs at this time in the EIS process.

In summary, a comprehensive analysis of connected and cumulative actions is required at this stage of the DEIS. If NPS is unable to satisfy this requirement, then considerations for diversified operations should be removed before the Final EIS is issued.

- The introduction of sheep, goats, and chickens into a proposed Pastural Zone and pigs into the Ranch Core Zone will create conflicts with wildlife that are not analyzed in the DEIS.
- In addition, the DEIS fails to analyze impacts of diversification on native wildlife, including fragmentation of habitat, potentially detrimental changes to movement patterns, loss of forage areas, and reductions in available range. Cattle, sheep, goats, chickens, and pigs require different confinement and management methods that create impacts to resources. A field used to graze cattle is still available to coyotes, bobcats and raptors as territory to hunt gophers and voles; the same is not true of an area used for row crops or raising chickens. Eliminating territory for predators and raptors will have a negative consequence on those populations - populations NPS managers are tasked with protecting.
- The DEIS fails to clearly outline impacts from increased types of commercial traffic on the Seashore's infrastructure and visitor serving uses. In particular, an increase in truck traffic is reasonably foreseeable for commercial operators to distribute and conduct on-site sales. Diversified activities will add commercial trucking to export crops and livestock (sheep, goats, pigs, and chickens) for processing outside of the planning area. In addition, the DEIS allows for ranchers to import crops and livestock into the planning area for small-scale processing or retail sales at farm-stands that will also increase commercial trucking.
- The DEIS fails to analyze or propose any mitigation of impacts for boat-in camping along the shores of Drakes Estero. Proposals for camping and visitor development in areas that could impact wilderness areas must consider cumulative impacts of visitor overnight camping near marine wilderness. High visitation and overnight camping means increases in frequency and number of visitors accessing Drakes Estero, the need for installation of toilets or a program that educates and enforces appropriate human waste disposal, education and enforcement of camp fires, and establishment of trash facilities or education and enforcement for visitors to pack trash out.

The Seashore has had to close other remote boat-in camp facilities in the past along Tomales Bay, like Jack's Beach, due to negative cumulative impacts resulting from human waste and excessive trash that littered the Tomales Bay shoreline and impaired water quality and created public health issues. In addition, the lack of enforcement at remote sites also contributed to the damage of significant cultural resources of the Coast Miwok, federally recognized as the Federated Indians of Graton Rancheria.

- The Seashore is the only national park with a native population of tule elk. The elk have been prevalent in the Bay Area and Marin for thousands of years, long before their extirpation in the 19th century. Tule elk are considered natural resources and constitute an important part of the Seashore's ecosystem. Although tule elk are not a listed species, they are an important economic and natural resource for the Seashore that should be considered in addition to the lease/permit obligations that the Seashore holds. Removal of the Drakes Beach herd will have negative impacts to visitor experiences within the Seashore.

Any strategies to manage the elk populations should be in the context of managing resources like other natural resources within the Seashore and not for the benefit of commercial lease holders. The GMPA should protect and manage natural resources, including tule elk, with conservation of these resources as the highest priority, as mandated by the Seashore's mission and current NPS management policies. Long-term leases and overall management strategies should strive to reduce conflicts and find non-lethal management strategies to balance and accommodate the presence of elk and cattle.

As for proposed action, I continue to urge you to reference the reporting done by the West Marin Environmental Action Committee.

Thank you for this opportunity to share our comments, please take them to heart.



Name: Harris, Kim

Correspondence: Point Reyes National Seashore in California was established as a national park in 1962!

The government paid \$50 million to purchase the land from farming and ranching families for 'native wild species!'

The Elk must take precedence over farming and ranching activities. Grazing negatively affects ecosystems, causing water pollution and soil erosion, spreading invasive species and disease, and harming endangered species.

PLEASE stop allowing farm cattle in this NATIONAL PARK! Thank you - Blessings ~

Ask yourself, would God, the creator of these animals, approve of any abuse to his creations?! karma to all animal abusers

"Compassion for animals is intimately connected with goodness of character; and it may be confidently asserted that he who is cruel to animals cannot be a good man." -Schopenhauer

"The greatness of a nation and its moral progress can be judged by the way its animals are treated. I hold that the more helpless a creature, the more entitled it is to protection by man from the cruelty of man." - Mahatma Gandhi, Indian spiritual/political leader

"The question is not, can they reason? nor, Can they talk? But rather, Can they suffer?" - Jeremy Bentham, 19th century Philosopher, Oxford University

"I regard animals and humans in the same light. All of them suffer pain, and all of them deserve compassion." - Mohammad Alaa Aljaleel

"Earth was created for ALL LIFE, not just human life." -Anthony D. Williams

"Man did not weave the web of life - he is merely a strand in it. Whatever he does to the web, he does to himself." - Chief Seattle

"We must fight against the spirit of unconscious cruelty with which we treat the animals. Animals suffer as much as we do. True humanity does not allow us to impose such sufferings on them. It is our duty to make the whole world recognize it. Until we extend our circle of compassion to all living beings, humanity will not find peace." - Albert Schweitzer, physician/Nobel Laureate

Until one has loved an animal, a part of one's soul remains unawakened. -Anatole France

I've never met an animal I didn't like, and I can't say the same thing about people. -Doris Day

"The more I know about people, the better I like my dog." - Mark Twain, American author

#7459

Name: P, Toby

Correspondence: I support alternative F, phase out ranches and restore the land to what it was bought and paid to be - a national park dedicated to wildlife protection. Cattle grazing is harmful to the environment and this space is for the native species, the Tule Elk. We have an over abundance of cattle and it is wreaking havoc on native habitats in the US, from wild horses to elk to many other species. Please leave national parks unspoiled by the harmful destruction that cattle leave in their wake. thank you

#7460

Name: N/A, N/A

Correspondence: This is a place of sanctuary not only for the wildlife, but for my mental health. I've been visiting this space for years and it breaks my heart to think this place of life for wild animals will be destroyed for ranching on land that is supposed to be used for public use - not private profit. No Ranching - Plan F.

#7461

Name: Turcza, John

Correspondence: I'm writing to support the public access and bicycling improvements outlined under Alternatives B, C, D, E, and F. I strongly support proposals that would lead to the planning and implementation of bicycling routes on trails, ranch roads, and pathways throughout the planning area, including but not limited to: 1) a connection between Devil's Gulch and Platform Bridge Road using existing ranch roads, 2) a connection between Bolinas Ridge Trail at Olema Hill and Point Reyes Station to serve as an interim connection for the Cross Marin Trail, 3) a connection between Bolinas Ridge Trail and Five Brooks Stables using existing ranch roads 4) a connection between Drakes Estero and Abbotts Lagoon Trail using existing ranch roads, 5) a connection between Marshall Beach Trailhead and Pierce Point Road using existing ranch roads, and 6) an Estero Trail loop using existing ranch roads. I encourage NPS to collaborate with ranchers and other stakeholders to educate the public and address concerns related to public access on working ranch lands. The improvements outlined above would enable and encourage me to visit the Seashore more regularly-and by bike, rather than car. I would feel much safer riding in the Seashore and surrounding areas on trails, pathways, and ranch roads, rather than on roads shared with fast-moving vehicular traffic. Bicycling opportunities are currently very limited and fragmented, so any improvements in connectivity and the creation of new loop options would enable me to enjoy more of the Seashore and surrounding areas by bike.

#7462

Name: ahlstrand, HEIDI

Correspondence: protect nature

#7463

Name: Nibert, Jenna

Correspondence: I am disgusted and disappointed that the park service would put private interests over the wellbeing of our public lands and wildlife. I am utterly appalled and strongly urge the reconsideration of this proposition. Put our native wildlife first, not private agricultural entities that harm our land and water.

#7464

Name: De leon, Alma

Correspondence: As a member of the California-based international animal protection nonprofit organization In Defense of Animals with over 250,000 supporters, I oppose the National Park Service plan to kill native Tule elk, grow commercial crops, and permit ranchers to add chickens, turkeys, sheep, pigs, and goats to their exploitative operations. For this reason, I support Alternative F.

As national park land, this property was specifically set aside to protect, restore, and preserve the natural environment including the wild animals who live there. The original intention was to phase out dairy and cattle ranching, not add more crops or animals to increase ranching profits.

The proposed plan does not address the damage from grazing, including water-quality degradation and soil erosion. Also, adding new crops will create more conflicts with native wild animals.

Please abandon this inhumane and destructive plan by selecting Alternative F. I urge you to restore the Seashore's Pastoral Zone for wild animal habitat and repurpose historic ranch buildings for scientific research, interpretation, and public education.

#7465

Name: Drosten, Fritz

Correspondence: Point Reyes National Seashore is a "Restricted Use Land" and when established in 1962, ranching was never intended to be a part of the seashore forever. It was planned that ranching would be phased out.

I am a volunteer at another national park, and along with the thousands of visitors, I want to see what they want to see: wildlife, wildflowers, and in the case of Pt Reyes, the seashore. They want to hike in the area, and they want healthy wildlife. They want access to the area, more camping areas (there are no car camping areas in the park currently). That's what I want, too. Per the national park service, "Preserving shoreline areas and offshore islands, the national lakeshores and national seashores focus on the preservation of natural values while at the same time providing water-oriented recreation". That doesn't include preserving ranches with cows that overgraze the terrain, pollute the water and destroy native plants. Those buildings can be repurposed for education, interpretation and research. The financial benefits or losses from discontinuing ranching listed in the report are not significant.

Ranchers received money for the sale of their lands to the park service, and were allowed a 25 year lease. That ended long ago. They did not use their money to move their operations. They don't pay taxes now! They pay far less than other ranchers pay to graze on public lands. Now that farms have historic designation, their buildings are historic. Their cows are not, and the public has access to one historic farm, a non-working one at Pierce Point. The other existing ranch operations do not add to the National Seashore. Currently here is no cultural or interpretive value to their farms, and the public sees only many no trespassing signs and fenced off areas.

Environmental impacts: Cattle are the leading cause of greenhouse gasses at the seashore. Methane gas is more damaging to the environment than CO2. Where are the mitigation plans were the ranches to continue? There is no discussion of the impacts of diversification of the existing ranches on the environment and wildlife making it an incomplete EIR. Except that option F would not include it.

Presence of cows in this national seashore has tremendous environmental impacts that do not seem to be mitigated in anything but the alternative F. Alternative F "would eliminate all impacts on soils associated with ranching activities." Water quality would improve. Native coastal prairies could be returned instead of the presence of land with non-native grasses dominating their pastures. The pastoral zone should be restored to native wildlife habitat, native plant communities, and should allow scientific research and education. Visitors could see Tule elk, an original California native species, a type of animal far less destructive to the hillsides than cows. They could see normal birds, not just the crows that follow cattle. Birds have been shown to be declining such that one on four have vanished (Cornell lab of Ornithology). The Snowy Plover has nesting areas down-hill from the drainage of the contaminated water. Land and sea life would benefit from cleaner water. Why would the park service choose an environmentally unfriendly choice as their preferred choice? In today's world with current climate concerns?

Ranches do not belong on Point Reyes National Seashore, and I urge consideration of and choosing option F: Ranching operations to be discontinued. All areas of soil, water vegetation, wildlife and air are negatively impacted by ranching in the Point Reyes National Seashore.

#7466

Name: Killingsworth, Sarah

Correspondence: GMP Amendment c/o Superintendent Cicely Muldoon Point Reyes National Seashore 1 Bear Valley Road Point Reyes Station, CA 94956 Via Online Portal

RE: General Management Plan Amendment Draft Environmental Impact Statement

Dear Superintendent Muldoon:

I appreciate the opportunity to provide comments on the National Park Service (NPS) Point Reyes National Seashore's General Management Plan Amendment (GMPA) Draft Environmental Impact Statement (DEIS).

Point Reyes National Seashore is a special place. The purpose statement for the Park states, "Established for the public benefit and inspiration, the Point Reyes National Seashore protects a rugged and wild coastal peninsula and surrounding waters, connecting native ecosystems, enduring human history, and recreational, scientific, and educational opportunities."

The Draft Environmental Impact Report fails to consider or analyze a number of foreseeable consequences of the Preferred Alternative (Alternative B). Specifically, the DEIS for Alternative B fails to consider foreseeable impacts from diversification and the proposed succession policy. Additionally, in Alternative B, the tule elk management improperly prioritizes commercial operators in the Park over a native species, which should be protected.

First, there does not appear to be any authority for the NPS to allow diversification in the GMPA. No legal authority for diversification has ever been provided to the public in the GMPA process.

Second, diversification will lead to the following foreseeable problems, none of which are addressed meaningfully in the DEIS:

- 1) Increased conflicts with wildlife: The increased conflicts with wildlife arising from chickens, sheep and pigs could result in loss of animals for the ranchers and/or degradation contracts which result in wildlife deaths. The DEIS does not include an analysis of this conflict.
- 2) Loss of wildlife habitat: Areas enclosed for chickens or cultivated row crops will no longer be available to bobcats, badgers, coyotes and birds of prey for hunting gophers and voles the way the pastures are currently available to these animals. The fragmentation and loss of habitat/territory for native predators and raptors was not analyzed in the DEIS, nor was the potential impact on those wildlife populations.
- 3) Decline in water quality: The NPS lacks adequate data about current water quality, and the studies cited (which do in fact note contaminated waterways near ranches) are quite dated. Additional fertilizers for crops, and the introduction of additional livestock such as pigs, will likely cause further decline in water quality. These impacts have not been properly evaluated.
- 4) Decline in air quality: Additional trucks and traffic, as well as additional animals will likely cause a decline in air quality, but no analysis of this issue is included in the DEIS.
- 5) Loss of scenic value: The Park's wild, scenic beauty is negatively impacted by modern agricultural buildings and adding row crops, greenhouses, chicken coops and other buildings to support diversification. The DEIS does not address the impact of diversification on scenic value.
- 6) Inconsistency with historic designation: The proposed diversification activities could be inconsistent with the historic designation areas, but this issue is not addressed in the DEIS.
- 7) Impediment to visitor uses: By immediately negotiating Ranch Operating Agreements, while implementation of improved visitor experiences through new trails and educational facilities will take substantial time and resources, the result will be prioritization of commercial activities over visitor experiences; this is not addressed in the DEIS.
- 8) Damage to Park infrastructure from increased truck traffic: As someone who drives in the Park regularly, I see that the roads in the PRNS are literally falling apart. The potholes and cracks in the roads are everywhere. The repairs have been delayed and I understand the bids to do the current repairs exceed the projected budget. There is a wealth of data available regarding the damage trucks do to roadways; the milk, hay and gas trucks cause daily damage to the roads in the Park, at taxpayer expense. Diversification will require additional trucks for fertilizer, transport of animals, and transport of crops. And if ranchers are allowed to bring in outside goods for sale in the Park, those trucks will add to the road damage as well. The DEIS does not contain any analysis of the increased

damage to Park infrastructure from diversification (nor does it address other foreseeable damage like visitor cars parking along the roadside). The money spent repairing additional road damage from diversification could be better spent building educational facilities or maintaining and improving trails.

Third, the succession policy includes an option for outside operators to bid on ranch leases; this is inconsistent with the historic and cultural values of multi-generational ranching, and could lead to large commercial operations on ranches in the Park. Once the door is opened to diversification and outside operators, it is reasonably foreseeable that sometime in the future the historic dairy and ranching operations will be replaced by commercial chicken operations or other, more lucrative options. That is a far cry from protecting the historic California dairies and extending leases to current ranching families. The ranch leases should be limited to existing ranching families (operating in a manner that does not negatively impact Park resources) as the DEIS does not properly evaluate the foreseeable consequences of third party operators.

Fourth, Alternative B includes a reference to possible boat-in camping in Drake's Estero. The DEIS does not include any analysis of the impact on waterbirds, nor the problems with human waste and trash that boat-in camping will create.

Fifth, the DEIS Alternative B includes culling of the native tule elk. The tule elk are one of the highlights of visitor experiences in the Park, and the Drakes Beach herd is an easily and regularly visited herd of tule elk. The preservation of resources in the PRNS should be the highest priority, and tule elk should be protected. The DEIS does not include a thorough analysis of alternatives to lethal methods, and prioritizes commercial operations over protection of an important Park resource.

Finally, the DEIS fails to address the elephant in the living room: the lack of resources to implement many aspects of Alternative B, including but not limited to enforcement, monitoring mitigation measures, creation of new trails, or reclaiming historic buildings for educational purposes. It is my understanding that the PRNS is currently under-funded. Many aspects of Alternative B require extensive resources to create, maintain, monitor, mitigate or repair. The DEIS does not include a proposed budget for any of these things, nor any specifics about where funding will come from. The current state of the Park is failing roads, dilapidated abandoned houses and ranch buildings, inadequate resources for trail maintenance, no consistent, current water quality testing, and inadequate staffing to enforce existing PRNS rules. The Preferred Alternative should include specifics about cost, staffing and funding sources.

In summary, the DEIS highlights a number of problems with the preferred Alternative, Alternative B. As someone who loves PRNS, I ask that you go back to the drawing board and create a preferred Alternative consistent with the Park's highest priority: resource protection. Congress required the Department of the Interior to administer its Point Reyes lands "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. Sec. 459c (6)(a).

Please eliminate any type of diversification, culling of the elk, boat-in camping and the option for third-party operators to bid on ranch leases. In addition, I implore you to add a provision for ongoing, consistent water quality testing in places like Kehoe Creek, Abbotts Lagoon and other like surface waters in the Park, to ensure our resources are protected.

Thank you, Sarah Killingsworth

#7467

Name: Hentz, Erin

Correspondence: I'd like people to say they support alternative F, the only alternative that phases out ranches and

restores the land to what it was bought and paid to be - a national park dedicated to wildlife protection. Cattle grazing is harmful to the environment in so many ways, and this space is for the native residents, the Tule Elk. "

#7468

Name: N/A, N/A

Correspondence: 23 Sept 2019

Dear Point Reyes National Seashore,

Herein are comments regarding the proposed Pt Reyes Seashore General Management Plan Amendment (GMPA) for all lands currently under agricultural lease/permits within PRNS and the north district of Golden Gate National Recreation Area. I have been fortunate to enjoy Point Reyes National Seashore (PRNS) since I was six years of age, which is prior to the creation of the park, and I spend many weekends at PRNS hiking, birdwatching, and enjoying nature.

I am disappointed in the Management Plan for Point Reyes National Seashore. It is a document deficient in alternatives, deficient in details about some of the proposed actions, and neglects to remember that the park's mandate is to preserve and protect. The legislation that enacted establishment of the park put it best: "To preserve the recreation area, as far as possible, in its natural setting, and protect it from development and uses which would destroy the scenic beauty and natural character of the area". During the oyster controversy, the Park Service/federal staff (mostly) provided science-based leadership with a vision to protect a wild and natural park. This document fails to do so.

I remember the fight to save Limantour from becoming a housing development. Establishment of the park saved the ranchers. If it were not for the park, ranchers would have sold out long ago to developers and their lifestyle would have terminated. It is not the job of a national park to preserve and protect ranchers. It is, instead, the mandate of the parks to preserve and protect natural resources/wildlife.

A beneficial byproduct of the Point Reyes ranches is provision of habitat for tricolored blackbirds, a state-threatened species. I am not advocating that the ranches be abolished. The severe degradation from massive overgrazing must be addressed. There are too many cattle at PRNS. Ranchers have not done a good job maintaining fences. The management plan should include provisions to fine or penalize ranchers that allow livestock to enter protected areas. I frequently seen cattle - or their flops - at Abbott's Lagoon. The management plan must include more grazing exposures and present a detailed monitoring measurement. Why are some grazing exclosures in disrepair (e.g. Bull Point)?

The supplemental ag proposals-pigs, row crops, retail facilities, etc. -are not ok. All ranchers realize they are participating in a risk-filled business. It is not the duty of the public to be obliged to clutter our public lands with artichoke fields and farm stands. There are rumors that federal tax dollars are used to bring hay onto the ranchers during dry years. Unfair. In the US, some ranches survive, some go under. Beef and dairy (and oysters) may represent food but they are not critical to the survival of humans. As it is, we already subsidize the ranchers too much. According to Center for Biological Diversity (using 2009 data) The cost per animal unit for ranchers leasing back public lands at Point Reyes is \$7. The cost per animal unit for non-federal grazing lands in Marin county is \$15-20 (see [https://www.biologicaldiversity.org/campaigns/protecting\\_Point\\_Reyes\\_elk/pdfs/CowsAndElkByTheNumbers.pdf](https://www.biologicaldiversity.org/campaigns/protecting_Point_Reyes_elk/pdfs/CowsAndElkByTheNumbers.pdf)).

The GMPA is deficient because it does not provide any details about the supplemental ag proposals. What is the impact? How many acres dedicated to each type of alternative ag? Where would they get the water? What would be the damage to instream uses/fisheries, and the impact from toxic herbicide and pesticide laden runoff? All water should go to maximize salmonids and other wildlife. Regardless of data, ag alternatives would NOT preserve the natural character of the area.

I lead Audubon field trips to PRNS. My "clients" make the trek to enjoy a wild experience, see quail and peregrines, guillemots and tricolored blackbirds. They are delighted by coyotes and elk and ecstatic if I can show them a gray fox or a bobcat. And they enjoy the Sidalcea, chocolate lillies, lupines, gumplant, Brodiaeas. The vista of sky and sea without recent development. As do I. Retail operations, row crops, etc. are not appropriate.

Boat-in camping at Drakes Estero? Outrageous. People building fires, disturbing harbor seals and birds, garbage, more ravens. I have never seen a law enforcement staff person on the trails. How would any regs be enforced? Regardless, it is just not appropriate.

Additionally, the document does not address that the ranches provide a historic cultural resource-birdwatching. Options that preserve ranching must include a guarantee of continued public access. I have been birdwatching the Point Reyes ranchlands for 30 years. During this time, we have lost "birders habitat" as visitation has increased. My general understanding is that PRNS lands are public. Birders realize that we are allowed access for birding if we do not disturb livestock or come too close to ranch residences, and of course conform to any other regulations about safety, snowy plover protection, areas closed for marine mammal rookeries, etc.

In short, the document is deficient because it does not have a "protect the resources" alternative. Disappointing. Discouraging.

Thank you for the opportunity to provide comments.

Emilie Strauss

#7469

Name: Labiner, David

Correspondence: I am writing to comment about the Point Reyes Seashore Draft Management Plan and Environmental Impact Statement. To summarize my opinion, I favor Alternative F that would phase out ranching completely in this area. My wife and I have visited Point Reyes to enjoy the birds and other wildlife of the area. The other alternatives in the Plan would diminish our experience and desire to visit.

The plan discusses diversification (except in alternatives A and F) and this is a weak point in the plan and EIS. There is no discussion of the impact of increased agriculture and livestock on the park's wildlife and resources.

The Park Service is obliged to preserve historic and cultural resources, i.e., the infrastructure and ranch buildings NOT cows. It is time to give this land back to the public and not allow private ranches to prevent our enjoyment of this wonderful place.

Several alternatives of the plan would allow for the permanent presence of ranches on the Park. This was not the original intent of the NPS but rather the original plan was to gradually retire the ranches. The perpetuation of ranches rather than the retiring of them is unacceptable. The EIS makes reference to the fact that cattle have an impact on the plant and animal species of the park. However, none of the alternatives discuss the cost or time-frame for mitigating these impacts. The park is meant for the enjoyment and use of the public not for private business. Ranching will fundamentally change this ecosystem and not for the better. It would be best to phase out ranching in this region as originally intended. The cost of ranching to our park. The National Park Service has not provided any information on the dollar amount or portion of its budget that goes to ranching-related expenses. Ranching places increasing demands on dwindling park budgets, while park improvements and a backlog of maintenance, along with public programs and interpretation, go unfunded. Meanwhile, scarce resources go to support 24 ranchers operating in the Seashore, including killing wildlife to benefit their operations. Ranching's environmental impacts have an untallied economic impact on the Seashore. Internal Park Service memos indicate monitoring the ranches for lease compliance and environmental damages already places outsized demands on the Seashore's staff and budget. The NPS has failed to enforce lease agreements when leases are violated. Can we

expect that expanded agricultural practices will be met with responsible oversight with no expansion of budget to enforce these more complex leases?

The NPS mission does not include guaranteeing commercial operators a living. Yet, every alternative except No Action (A) and No Ranching (F) allows "diversification" for the purpose of shoring up the ranchers' bottom line. There is no discussion of diversification impacts to the park. Ranchers in the Seashore already have a competitive advantage over ranches outside the park. Seashore ranchers benefit from discounted grazing fees, below-market-rate housing, and maintenance and improvements to roads, homes, and farm buildings covered at public expense. Seashore ranches pay no property taxes.

There is no mention of mitigation for cattle's impact to the climate due to the methane production by the cattle.

Removing native Tule elk from the park to benefit the ranchers is built into four of the NPS alternatives, including the NPS's "preferred alternative." The EIS says that the Seashore's land, water and wildlife would benefit were ranching to "cease." But there is no plan for protecting wildlife from ranching's impacts or mitigating habitat loss from cattle grazing or growing crops. Other than killing Tule elk, there is no discussion of avoiding wildlife conflicts.

For these reasons my wife and I strongly oppose continued or increased ranching in Point Reyes National Seashore. We favor alternative F to have no ranching in our public park!

#7470

Name: Drescher, Amaru

Correspondence: Dear National Park Service,

One of my favorite memories growing up is from visting Yellowstone national park with my mom and sister. It was so amazing to be able to see large, wild animals: bison, grizzly bears, moose, elk and even wolves. I will never forget those experiences. I would like to see wild animals more often, but getting to Yellowstone is so expensive and time-consuming. And I know I could go to Point Reyes to see elk and elephant seals, but then I am forced to see human agricultural operations as well. And seeing large numbers of cows standing in mud, or seeing cow patties and trampled ground everywhere, and trucks and ranch building and fences - that is not at ALL a wonderful wildlife experience! I don't go to Point Reyes to see cows! Or smell cow manure and cow urine! I want to see more wildlife, and have the experience of fresh clean air and beautiful natural ecosystems within easy driving distance from my home. I want Point Reyes to be what it was MEANT to be, that is a park dedicated 100% to the return of wildlife and biological diversity for humans to VISIT, not to EXPLOIT and POLLUTE (like the ranchers do). I shouldn't even have to write this comment, because it seems self-evident to me that there should be no more human agricultural operations in Point Reyes! It is obvious from the fact that ranchers were paid to get off of their land half a century ago. I am a US citizen, and the National Park Service is MY National Park Service. And I know that I am in the vast majority of people of this state and country who want to visit Point Reyes but don't. We want a wildlife experience! So hurry up and set things right asap. Get these ranchers out of Point Reyes now! Sincerely, Amaru Drescher

#7471

Name: Pozzi, Martin

Correspondence: Dear Point Reyes National Seashore Superintendent,

Thank you for the opportunity to comment on the draft EIS for the Seashore. I am a West Marin resident and member of Marin County Farm Bureau, I favor "Alternative B" in this draft EIS. I support the comments of California Farm Bureau Federation, California Cattlemen's, National Cattlemen's Beef Association, Marin County Farm Bureau and the Sonoma-Marin Cattlemen's association. I support agriculture in the Point Reyes National Seashore and the ability of the farm families in the Seashore to sustainably and viably operate their farms. Thank



you for all that has been done to work with agriculture, please continue to make policies that enable the family farms and ranches in the Point Reyes National Seashore to contribute to the local food shed. Please consider "Alternative B" and the changes offered in the comments of the organizations above mentioned as the final EIS/GMPA is compiled.

#7472

Name: Senum , Reinette

Correspondence: What is going on? Why O Why in the world would you allow this? The diversity of our planet is being destroyed before our eyes and THIS is what all of you choose to participate in? The further destruction of our planet? The living things that roam about it? What you have with the Elk is extraordinary. This is what attracts people. Adds to the local economy and adds to the vibrance of your community. Why kill the golden goose?!

Stop while you are ahead! Preserve the Elk!

Reinette Senum Nevada City Mayor

#7473

Name: Pozzi, Regina

Correspondence: Dear Point Reyes National Seashore Superintendent, Please select the preferred alternative, "Alternative B" for the future of ranching in the Point Reyes National Seashore. I support agriculture in the Seashore and think it is a vital part of the region's history, culture, and current economy. I appreciate the time and effort that has gone into researching all options for the draft EIS. I support 20-year leases, the ability for farmers and ranchers to succession plan, and the opportunity for farms and ranches to diversify their operations to viability and sustainability adapt their operations for generations to come. I wish that the diversification was not so limited in scope or size, 2.5 acres around structures in ranch core with no irrigation and other restrictions is cumbersome. In addition, the draft EIS would have been more complete if research was done on an option that includes an Elk Fence between the agriculture and wilderness area or Elk relocation to the wilderness area. Agriculture is a partner in natural resource conservation and preserving open spaces. Many of the beautiful natural landscapes in the US near large urban areas are preserved because agriculture was there first to curb development. Agriculture and nature do co-exist, we support the farmers and ranchers in the Seashore for their part in providing for the local food shed in a sustainable way. Agriculture plays an important role in combating Climate Change by providing local food and carbon and greenhouse gas drawdown. Agriculture is important to me in the Point Reyes National Seashore, the preferred alternative B is the best option from the draft EIS.

#7474

Name: Spanne, Laurence

Correspondence: Point Reyes National Seashore selected and established as a National Seashore because of its unique scenic, scientific, natural, cultural, and historic qualities. It is a national treasure. Private landowners were compensated and allowed to continue some agricultural and commercial operations at a reasonable level compatible with other uses so that its overall values and important objects and resources were not damaged or otherwise harmed. Your current plan to expand agricultural operations flies in the face of the original proclamation. For the sake of a few extra dollars in the pockets of agriculturists and others, much harm will undoubtedly be done to this priceless resource. The expansion of grazing and the conversion of lands to cultivation will certainly adversely wildlife and native vegetation. Pesticide applications will undoubtedly increase.

We implore you to reconsider this unwise plan and keep Point Reyes as it was originally intended to enrich our lives. We have visited this area many times and are continually uplifted and amazed by its beauty and irreplaceable qualities. Please think about what you are doing and reverse course. No action is the best action.

Thank you for considering our opinion.

Larry and Renae Spanne

#7475

Name: Kelly, Paul

Correspondence: The DEIS fails to show how the introduction of domestic farm animals into Pt. Reyes National Seashore has the real risk of bringing with them a diversity of infectious agents and parasites that could impact the health of native wildlife and visitors within the park. Horses, cows, goats, sheep, pigs and chickens are all hosts for numerous viral and bacterial pathogens, protozoans, internal parasites such as liver flukes and round worms, and ectoparasites such as ticks, mites, fleas and lice. This potential risk is best exemplified by the recent discovery of the Asian long-horned tick infesting sheep in New Jersey. It has spread to seven other states and is moving west. This tick transmits numerous pathogens infectious to other animals and humans, including the fatal virus that causes Severe Fever with Thrombocytopenia Syndrome. The highly fatal virus of swine, African Swine Fever Virus, is rapidly spreading in Europe, and if introduced into the United States, could be imported to PRNSS by infected pigs. Goats, cows and sheep are all hosts for several Brucella species that cause Brucellosis, which is notorious for infecting humans and spreading to wild ungulates, such as elk. Other potential infectious diseases introduced with domestic live stock include Q fever, Chlamydia, Leptospirosis, Escherichia coli O157 disease, Campylobacteriosis, and Listeriosis. Sheep and cows are hosts for the liver fluke, Fasciola hepatica, which is a threat to both humans and domestic stock. Chickens can bring with them Avian Influenza Virus, Campylobacter and Salmonella, and be an amplifying host for West Nile Virus to infect resident mosquito populations. Increasing the domestic animal populations within the park will also most certainly cause an irruption of filth flies and other pest insects that feed on the animals' feces or utilize the new wealth of excrement to complete their life cycles. These insects will cause annoyance to wild and domestic animals as well as to the humans visiting the park. With more domestic stock living in the park, more animals will be dying there, many probably of undiagnosed illnesses. How the carcasses of these dead animals are handled may result in environmental contamination of unforeseen consequences. The NPS must show how imported and exported livestock would be quarantined and screened to prevent the transmission of zoonotic diseases.

Raven densities at PRNSS are among the highest in the State of California as a result of sloppy agricultural practices permitted by the NPS.

The DEIS fails to acknowledge the profound impact that ravens have on the coastal ecosystem in PRNSS. The Common Raven has been implicated as a causative factor in the declines of several threatened and endangered species including desert tortoise, California condor, marbled murrelet, California least tern and western snowy plover. Other sensitive species such as common murrets and ash storm petrels have been severely impacted by raven predation on their eggs. The DEIS fails to explain how these sloppy agricultural practices, which may increase with additional live stock on site, will be rectified.

#7476

Name: Lotts, Margaret

Correspondence: Please do not allow the Tule Elk to be pushed out. I am sick and tired of cattle ranchers taking over our lands. They blame everything but themselves for the destruction of the lands. They need to look at themselves. There is too much mismanagement of our open lands i.e. National, State, and BLM lands. If the Tule Elk are pushed out for cattle this land will not recover. Please keep it as it is. And, no I am not a vegan or vegetarian. I don't like to see nature's beauty destroyed for the sake of greed.

#7477

Name: Moskowitz, Hannah

Correspondence: All three plans are extremely detrimental to the natural resources and irrevocably threaten the region's biodiversity. What is the point of enacting legislation to protect these lands if the governing body cannot even uphold it? (1916 NPS Organic Act, Point Reyes National Seashore legislation Section 459c-6, and Golden

Gate National Recreation Area legislation Section 460bb). This legislation makes this county incredibly unique, sacred and these plans work to destroy years of progressive work to preserve the natural beautiful and resources for future generations of wildlife and humans alike.

#7478

Name: Tucker, Lois

Correspondence: I support the ranchers.

I am a Sierra Club member and am completely against their member-wide email blast to try to get people to write against the ranchers. IMHO, it's a misuse of their membership information.

If the Sierra club is supporting the elk over the ranchers, then I am NOT with the Sierra club.

The ranchers are due complete support.

#7479

Name: Quispe, Coya

Correspondence: Hi there, I just found out from my mom that you guys are considering keeping ranching at Point Reyes. That's crazy! I wanna see more elk and bobcats and coyotes there, not cows! I remember my favorite time at Point Reyes was walking with my mom up the tomales Point trail a few years ago and seeing elk. Wow, just wild big animals with no fences between us and the animals. It was so thrilling! I wanna see elk in more places in Point Reyes. I don't wanna go to where the ranches are on Point Reyes, cause that is just so depressing! Those poor cows with those enormous udders and no calves with them. How can humans be so cruel!?? I obviously don't eat dairy products, because I think that is just plain wrong, to treat animals that way. Plus it's gross, all the cow shit and piss that goes on the land and into the streams of Point Reyes. Those streams are supposed to be PRISTINE, not polluted by farm animals. It's just so wrong! We gotta get those ranches at Point Reyes shut down, and it should've happened a REALLY LONG TIME AGO, way before I was born (I'm 21 now). But my mom told me that the National Park Service is actually thinking of keeping the ranches there even longer. That's just nuts. SO that's why I'm writing in (I've never done a public comment like this before). I can't stand the idea of this craziness going on any longer at Point Reyes. So I'm asking you to stand up to those rich and powerful and profiteering ranchers, and to protect Point Reyes, and make it recover from those horrible ranching operations. Do it now. Please! Coya

#7480

Name: Creque, Jeffrey

Correspondence: September 23, 2019

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

Re: Point Reyes National Seashore Management Plan Amendment Draft Environmental Impact Statement

Dear Superintendent Muldoon;

As Director of Rangeland and Agroecosystem Management at Carbon Cycle Institute (CCI), and having farmed in Point Reyes National Seashore from 1979 to 2004, I appreciate the opportunity to comment on the General Management Plan Amendment Draft Environmental Impact Statement (DEIS) for Point Reyes National Seashore and Golden Gate National Recreation Area.

CCIs mission ([www.carboncycle.org](http://www.carboncycle.org)) is to stop and reverse climate change by engaging working landscapes with science-based solutions that remove carbon dioxide from the atmosphere while promoting environmental stewardship, social equity and economic sustainability. Our strategic partners include; the California Association of Resource Conservation Districts, Resource Conservation Districts across California, Fibershed™ and the Marin Carbon Project ([www.MarinCarbonProject.org](http://www.MarinCarbonProject.org)). We strongly support continuation of dairy and beef ranching within the historic dairy and ranching districts on Point Reyes and the Olema Valley.

Point Reyes and Olema Valley ranchers are multi-generational rangeland managers, yet key documents supporting the DEIS, including a recent Grazing Plan prepared by students at UC Berkeley, were developed, in direct contravention of accepted conservation planning practice, without consultation with those ranchers. Point Reyes ranchers have made innumerable attempts over the past several decades to engage with the Seashores ranchland planning processes, but ranchers expertise and knowledge have been ignored in the DEIS. Most significantly from the perspective of CCIs focus on the role of working landscapes in climate change, the potential for agriculture to play a significant -and essential- role in climate change mitigation and ecosystem restoration at PRNS and GGNRA has been ignored or minimized throughout the DEIS. Failure to adequately consider the climate change implications of proposed actions within the DEIS render the document significantly insufficient and incomplete, and violate the NEPA requirement to consider the greenhouse gas implications of NPS actions.

As noted by the Intergovernmental Panel on Climate Change (IPCC 2019), Increasing impacts on land are projected under all future greenhouse gas (GHG) emission scenarios. &climate change creates additional stresses on land, exacerbating existing risks to livelihoods, biodiversity, human and ecosystem health, infrastructure, and food systems.

All sections of the DEIS should be revised to recognize that ranching can help to sustain the coastal grassland ecosystem, increase environmental awareness among the general public, promote an ethic of land stewardship and sustainable agriculture, and support local food and fibersheds ([www.Fibershed.com](http://www.Fibershed.com)) in the face of worsening climate change impacts. The stability of food supply is projected to decrease as the magnitude and frequency of extreme weather events that disrupt food chains increases. Increased atmospheric CO<sub>2</sub> levels can also lower the nutritional quality of crops. Global crop and economic models project a median increase in cereal prices in 2050 due to climate change, leading to higher food prices and increased risk of food insecurity and hunger. The most vulnerable people will be more severely affected (IPCC 2019).

The Air Quality, Water Quality and Soil Quality sections of the DEIS must be revised to fully evaluate the positive impacts of carbon farming, as was requested during the public scoping period for this process. The DEIS fails to describe the GHG drawdown potential of appropriate livestock grazing strategies, as applied in the carbon farming framework. Compost application, an important carbon farming practice included in many carbon farm plans because of outstanding GHG drawdown potential - - would be specifically prohibited if the current DEIS goes unchanged.

In over 50 years, PORE/GGNRA has never hired a single agricultural ecologist or other resource specialist with meaningful agricultural (other than rangeland) experience. NPS must establish an Agricultural Advisory Committee to guide PRNS decision making on all agricultural planning and management decisions. The PRNS Agricultural Advisory Committee should be made up of local agricultural and natural resource conservation experts, including: the local office of the USDA Natural Resource Conservation Service; the Marin County Resource Conservation District; the Marin County Agricultural Commissioners Office; the University of California Cooperative Extension, and the Marin Agricultural Land Trust. Strengthened multilevel, hybrid and cross-sectoral governance, as well as policies developed and adopted in an iterative, coherent, adaptive and flexible manner can maximize co-benefits and minimize trade-offs, given that land management decisions are made from farm level to national scales, and both climate and land policies often range across multiple sectors, departments and agencies& Many sustainable land management practices are not widely adopted due to insecure land tenure, lack of access to resources and agricultural advisory services, insufficient and unequal private and public incentives, and lack of knowledge and practical experience. Public discourse, carefully designed policy

interventions, incorporating social learning and market changes can together help reduce barriers to implementation (IPCC 2019).

The DEIS draft Foundation Document is significantly deficient because it largely fails to recognize historic and culturally significant dairy and ranching activities at PORE/ GGNRA. The DEIS does not explain the fact that the historic ranches within the planning area represent nearly 20% of the agricultural land in Marin County and the ranching families and their employees within the planning area produce nearly 20% of the agricultural product value in Marin County.

The preferred alternative must exclude elk from ranch lands. Although mandated by the 1998 PRNS Elk Management Plan, NPS has never effectively separated elk from cattle. Elk consumption of forage already threatens organic certification of the Seashore ranches, while damaging ranch fences and other infrastructure, and undermining ranch pasture management capacity. Insecure land tenure affects the ability of people, communities and organizations to make changes to land that can advance adaptation and mitigation. Limited recognition of customary access to land & can result in increased vulnerability and decreased adaptive capacity. Land policies (including recognition of customary tenure) can provide both security and flexibility of response to climate change (IPCC 2019).

The analysis of on-farm diversification in the DEIS is incomplete and lacks historical and regional context. The DEIS gives the false impression that the diversification sought by ranchers is new. The final EIS should explain that farming and ranching within the planning area was historically diverse, including both irrigated and non-irrigated row crops (including beans, peas, barley, artichokes and other vegetables), a wide variety of livestock species (including hogs and sheep), on-farm processing and on-farm sales. The limitation of row crops to 2.5 acres, permitted only in the ranch core, and prohibiting irrigation and compost use, flies in the face of the widely accepted importance of crop diversification and organic matter amendments as core elements of climate-beneficial agriculture. Agricultural diversification, expansion of market access, and preparation for increasing supply chain disruption can support the scaling up of adaptation in food systems (2019 IPCC report).

The DEIS restriction of sheep and goats to the ranch core and pasture sub-zones undermines the potential of these potentially powerful vegetation managers to be deployed to advance both ranch and Seashore vegetation management objectives. Goats have been successfully deployed to address invasive weeds and fire fuels at PRNS since at least 1997; NPS should support the use of sheep and goats as an ecologically appropriate strategy within the range subzone where there is significant threat of both brush encroachment and wildfire.

The DEIS assumes only adverse impacts to soils as a result of dairying and ranching. The NPS fails to consider the potential of carbon farming and the ecological benefits of implementing farm-scale carbon farm plans that would increase soil organic matter to benefit soil, water and air quality. The NPS should engage the Marin Carbon Project, including the Marin Resource Conservation District, which have extensive expertise in carbon farming in Marin. Appropriate design of policies, institutions and governance systems at all scales can contribute to land-related adaptation and mitigation while facilitating the pursuit of climate-adaptive development pathways. Mutually supportive climate and land policies have the potential to save resources, amplify social resilience, support ecological restoration, and foster engagement and collaboration between multiple stakeholders (IPCC 2019).

On page 6 of Appendix D, NPS states: On dairies, nutrient management may also be included as a soil amendment for forage production. Nutrient management is a comprehensive, whole farm assessment process, not a soil amendment. The DEIS also incorrectly equates fertilizer with compost and prohibits both. The use of compost should be allowed on all ranches. Pathogen-free and weed-free compost improves soil fertility, enhances water retention, reduces runoff and erosion, increases biodiversity and helps sequester carbon. NPS should consult with the Natural Resource Conservation Service, the Marin Resource Conservation District, and University of California Cooperative Extension Service to identify best management practices for both dairies and beef ranches to increase soil organic matter as both a widely recognized sustainable agriculture practice and a climate change mitigation strategy. The preferred alternative only allows soil fertility improvements on the pasture subzone, but

soil fertility improvement with compost, seeding, livestock management and other carbon farming practices, including comprehensive carbon farm planning and implementation, should also be allowed on the range subzone on both dairies and beef ranches to maximize the carbon sink potential of PRNS/GGNRA soils. As noted by the IPCC (2019), Some options such as soil carbon management are potentially applicable across a broad range of land use types.

Thank you for the opportunity to comment on the General Management Plan Amendment Draft EIS for Point Reyes National Seashore and Golden Gate National Recreation Area. After over 50 years of neglect, the unique opportunity to engage the enormous potential synergies among agriculture and natural resource conservation and management at Point Reyes yet remains. In the face of the rapidly accelerating pace of climate change, the urgency of such engagement grows daily. As the IPCC report makes clear, while agriculture has certainly contributed to the global crisis, engaging our working landscapes as actively managed carbon sinks, while simultaneously meeting the needs of a growing human population, is essential for its resolution, and for human survival on our beleaguered planet.

Sincerely,

Jeffrey A. Creque, Ph.D. Director of Rangeland and Agroecosystem Management Carbon Cycle Institute

cc: Dianne Feinstein, US Senator Kamala Harris, US Senator Jared Huffman, US Congressman Marc Levine, State Assembly Member Mike McGuire, State Senator Marin County Board of Supervisors

IPCC, 2019. Special Report on Climate Change, Desertification, Land Degradation, Sustainable Land Management, Food Security, and Greenhouse gas fluxes in Terrestrial Ecosystems. Intergovernmental Panel on Climate Change. <https://www.ipcc.ch/site/assets/uploads/2019/08/Fullreport-1.pdf>

#7481

Name: Ruth, Joy

Correspondence: I support Tulle elk. Please do not harm the elk. I support alternative F. The land the elk live on is parkland and it was designated parkland to protect the habitat for wildlife. Do not harm wildlife in order to use the land for farmed cattle. The ranchers must contain their stock on their private land! Leave the parkland to the wildlife!

#7482

Name: McGinley, Jessica

Correspondence: As a member of the California-based international animal protection nonprofit organization In Defense of Animals with over 250,000 supporters, I oppose the National Park Service plan to kill native Tule elk, grow commercial crops, and permit ranchers to add chickens, turkeys, sheep, pigs, and goats to their exploitative operations. For this reason, I support Alternative F.

As national park land, this property was specifically set aside to protect, restore, and preserve the natural environment including the wild animals who live there. The original intention was to phase out dairy and cattle ranching, not add more crops or animals to increase ranching profits.

The proposed plan does not address the damage from grazing, including water-quality degradation and soil erosion. Also, adding new crops will create more conflicts with native wild animals.

Please abandon this inhumane and destructive plan by selecting Alternative F. I urge you to restore the Seashore's Pastoral Zone for wild animal habitat and repurpose historic ranch buildings for scientific research, interpretation, and public education.

#7483

Name: N/A, N/A

Correspondence: There are always going to be cattle, and places for cattle to graze and roam. So, the idea of having this one specific area that won't be open for private cattle and dairy farming is not a hard decision. Unlike cattle, this is a rare opportunity, a special place for the Tule Elk to survive and flourish in their natural environment. It would really be a shame to lose this species.

Please save the Tule Elk at Point Reyes. Make this one of your great accomplishments in life, one that you will be proud to share with your kids and grandkids - this wonderful deed that you did.

#7484

Name: Parenteau , Laura

Correspondence: Pls do not let farmers use this land for cattle and farm animals.

#7485

Name: N/A, N/A

Correspondence: I support the continuation of the ranches as they are now and the control of the Tule Elk by culling and robust fencing

#7486

Name: Morgan , Drew

Correspondence: Ranchers and cattle's is one less thing we need. We need to preserve our nature and those who dwell in it. Please do not commit this atrocity all so that you can make pennies on a dollar. Do not destroy what is natural so something that does not belong there can live. Leave the beauty of the environment the way it is and contribute to e better future for our children by leaving nature alone.

#7487

Name: Fernandez, Cynthia

Correspondence: I am outraged that you would even consider killing any native Tule elk to make room for cattle! The National Seashore should belong to the native wildlife. The cattle industry has no right to be there and cattle ranching is unsustainable as well as damaging to the environment. People are turning to plant-based alternatives to beef. The Tule elk have every right to live on their native land, the cattle do not. Do not sell out the Tule elk to line the pockets of cattle ranchers. Please do not follow through with this plan, it is wrong on so many levels!

#7488

Name: Meinberg , Michael

Correspondence: Keep it ! keep it! keep It!

It is absolutely wonderful!

#7489

Name: Casey, Charles

Correspondence: I am a Marin County resident and a frequent visitor to Point Reyes National Seashore. The following are my comments on the draft plan.

The ranches were instrumental in getting the park established and in saving Point Reyes from development. We will forever be in their debt for this, and we must uphold our promise to allow them to continue with responsible ranching into the foreseeable future.

I would also like to comment on the electric bike policy. I support responsible use of e-bikes wherever conventional bikes are currently allowed, which is primarily fire roads. E-bikes provide a great opportunity for those who are older to explore the park in a responsible fashion, and they should be accommodated in the park's future planning.

Thank you!

Brian

#7490

Name: N/A, N/A

Correspondence: The National Park Service now has an unprecedented opportunity to end ranching on our public lands in these parks and doing anything else would be a grave disservice to the American people, as well as to the diversity of native plants and wildlife that belong on these lands.

Neither Point Reyes National Seashore nor the northern district of Golden Gate National Recreation Area were preserved as national parks to perpetuate cattle grazing and dairying. The ranches were purchased by the government and the ranchers were given more than adequate time to move elsewhere.

The proposed park management plan allows destructive levels of livestock grazing to continue on 28,000 acres of national park lands in this treasured Pacific Coast landscape, despite the myriad known adverse impacts grazing has on coastal prairie, riparian systems, springs, wetlands, and coastal dune vegetation.

The national seashore has already been degraded by ceaseless cattle grazing since this national park was established nearly 60 years ago. These public lands are essentially a sacrifice zone for a powerful special interest subsidized at taxpayer expense.

The 1916 Organic Act that formed the National Park Service mandated that natural resources on park lands shall not be impaired. The Point Reyes National Seashore legislation specifically mandates that this special coastline be "protected" and "restored."

Damaging livestock grazing has been allowed to persist for decades, and the damage to the high-value resources of the Seashore has been ongoing and intensifying. Emphasizing livestock ranching while subsidizing welfare ranchers is a takings of public land. Livestock don't belong on public lands in general and certainly not in a Seashore where fecal matter can get into the ocean.

The National Park Service should be managing the National Seashore for the benefit of wildlife and the natural ecology rather than subsidizing special interests at taxpayer expense. The proposed park management plan is flawed and must be stopped.

#7491

Name: Hessels, Saskia

Correspondence: Certainly in this day and age of alarming loss of biodiversity it is unconscionable to give ranchers interests priority of native, or non-native wildlife! I am a property owner of several acreage parcels in san geronimo valley for over 30 years. I have seen the devastation to the land of the beef industry on pt reyes. I host tourists. Without exception, they come to commune with the natural world. They are catching on to the 'grassfed beef' actually being europe introduced cows, who replaced the buffalo, an ancient hooved inhabitant in balance



with this land. I have personally witnessed the last slaughter of deer in 2007, and for what! It is time to put planet before profit! Ranchers are an outdated archaic phenomenon. Only the ancient wisdom of the harmony in the natural world can save humankind. I will be resisting this cowboy kill. Certainly, there are many other more creative and enlightened options and ways at this time in history...the ones that dobt only benefit the handful of ranchers?

#7492

Name: Samet, Melissa

Correspondence: Comments Submitted by Melissa Samet Marin County Resident and Regular Visitor to Point Reyes National Seashore

September 23, 2019

Re: Comments on the Draft Environmental Impact Statement for a General Management Plan Amendment for Point Reyes National Seashore

Dear Superintendent:

Thank you for the opportunity to submit these comments on the Draft Environmental Impact Statement for a General Management Plan Amendment for Point Reyes National (DEIS).

I am a regular visitor to Point Reyes National Seashore who has hiked its incredible beaches and trails multiple times each month for more than 20 years. I am drawn to Point Reyes for its natural beauty, its wildness, and its abundant wildlife. It is not an exaggeration to say that Point Reyes National Seashore is the reason I still live in California, and it is the resource in California that I cherish most. I believe that the Park should be managed to preserve and enhance its wildness and its wildlife for the benefit of the public at large.

General Comments I strongly oppose the DEIS Preferred Alternative (Alternative B). Alternative B is the most environmentally damaging alternative considered in the DEIS, and is in direct violation of the most fundamental purposes of Point Reyes National Seashore and the National Park Service Organic Act. Alternative B sacrifices the health of the Park, its incredible native wildlife, and the visitor experience, for the sole purpose of providing heavily subsidized profits to 24 ranchers.

I strongly urge the Park Service to select Alternative F as the final selected alternative to permanently phase out ranching in the Park. Alternative F is the only alternative that will protect the Park and its bounty of native wildlife, increase the resiliency of the native Tule Elk herds, and greatly improve the visitor experience.

At the absolute minimum, the National Park Service (NPS) should prioritize the protection and future viability of the Park and its native wildlife by ensuring that any amendment to the General Management Plan: (1) phases out all dairy operations, without the option to convert to beef ranches; (2) eliminates all activities and removes all fencing that limits the population growth or geographic extent of the Park's Tule Elk; (3) prohibits "diversification" at the ranches; (3) requires documentation of full compliance with existing lease and permit conditions-including all pollution prevention and mitigation measures-before any future leases are granted; and (4) restricts leases to a maximum of 5 years to ensure that the ecological impacts of any continued ranching is fully and timely assessed on a regular basis, and that changes can be implemented-including full cessation of ranching if necessary-in a timely manner.

Specific Comments

Alternative B is the most damaging alternative considered in the DEIS and continues the long history of significant, continuous subsidies to 24 ranchers. Alternative B extends grazing rights for at least 20 years; authorizes ranchers to add previously unauthorized row crops, pigs, sheep, goats and chickens to their operations;

guarantees the killing of native Tule Elk to protect grass "reserved" for cows and cattle; and prohibits the natural growth and geographic expansion of the Park's Tule Elk herds.

The DEIS and numerous studies demonstrate that dairy and ranching activities have already caused significant harm to the environment, including soil erosion, water pollution, loss of native plant species and infestation by invasive plants, declines in fish and bird populations, conflicts with wildlife, and loss of public access to public land. These harms will increase and expand under Alternative B, all for the sole purpose of providing highly subsidized profits to a handful of ranches and dairies.

Alternative B is also guaranteed to result in the direct killing of hundreds of Tule Elk and to prevent the natural expansion of the Tule Elk herd-expansion which would help ensure the long-term health and resiliency of the Park's most iconic wildlife species. Alternative B will also make the Park far less resilient to the ongoing impacts of climate change.

My personal experience underscores the significant harm to the visitor experience from the Park's industrial agriculture activities. Visitors are regularly forced to view dilapidated farm buildings, pastures that are little more than seas of mud, fences that mar the landscape, and rampant polluted runoff. Visitors must also often deal with the overwhelming smell of manure being sprayed on fields blotting out the wonderful smell of the sea air. All of this will continue under Alternative B.

The Park should be managed for the public good and for the fish and wildlife that rely on this vital resource, as required by law. The Park is a public treasure and should not be damaged for the personal profit of a few.

#### 1. Alternative B Will Ensure Unacceptable Impacts To Tule Elk and Other Wildlife

As discussed below, the DEIS and other studies document the extensive damage that ranching and dairy operations have caused to the ecological health of the Park and to the wildlife that rely on it. Alternative B will make the already significant direct, indirect, and cumulative adverse impacts much worse, with cascading impacts on the Park's wildlife.

Alternative B will also harm the Park's iconic Tule Elk-a species that exists in no other national park-in many other ways. Notably, Alternative B will result in the culling of completely healthy Tule Elk to protect rancher profits. Alternative B will also prevent the natural growth and geographic expansion of the Park's Tule Elk herds. This will doom the continued natural recovery of the Tule Elk in the Park.

Once numerous on Point Reyes peninsula, the native Tule Elk had been extirpated by early settlers and were believed to be extinct. Tule Elk were reintroduced to the park in 1978, and provide a rare success story in wildlife recovery. Despite this success, however, the Tule Elk remain at significant risk. To ensure forage for private cattle, most of the elk are confined behind a fence at Tomales Point, cut off from pasture and water that the NPS leases for cattle grazing. In 2016, the NPS disclosed that 250 of these confined elk had perished during the drought. The elk are also increasingly inbred, but cannot be relocated outside of the Park because some have tested positive for Johne's, a bacterium transmitted to wildlife when cattle manure is spread on fields and runs off into waterways. Johne's disease has been documented in dairy and beef herds at Point Reyes.

Cows also currently outnumber Tule Elk 10 to 1 in the Park. Alternative B would set these numbers in stone by ensuring that the Tule Elk population in the Park remains at its current size and restricted to its current geographic locations. The DEIS has advanced this outcome through an analysis approach that cannot be reconciled with the legislatively authorized purposes of the Park.

The DEIS has based its analysis of the Seashore's carrying capacity on the maximum number of cattle the land can support based on historical conditions. To maximize protection and restoration of the Park's resources, however, as required by the Park's authorizing legislation, the DEIS should have based its assessment on the ecological needs of Tule Elk and other wildlife. As part of this assessment, the DEIS should have fully accounted for the

unacceptable impacts to range health and the Tule Elk created by the current management regime. If a full analysis demonstrated that Tule Elk and the Park's vast numbers of other wildlife could thrive on existing and/or restored prairie lands, the DEIS then could have considered whether some degree of grazing could continue while still maintaining healthy populations of native wildlife.

## 2. The "Diversification" Authorized by Alternative B Will Harm the Environment and Create New Rancher-Wildlife Conflicts

Alternative B (and indeed all alternatives reviewed in the DEIS except Alternative A (No Action) and Alternative F (No Ranching)) allows each rancher to add crops and small livestock-pigs, sheep, goats, and up to 500 chickens-to their operations. The DEIS fails to provide any information or discussion of the impacts of this expanded agriculture on the Park's wildlife or natural resources, in direct violation of the National Environmental Policy Act.

In addition to causing environmental harm, Alternative B will create new rancher-wildlife conflicts by allowing ranchers to add crops and small livestock to their operations that will unquestionably draw predators and other wildlife. With this diversification, none of the Park's magnificent predators will be safe from calls for their extermination - not the red tailed hawks, marsh hawks, peregrine falcons, osprey, owls, fox, coyotes, bobcats, or other predator species.

While Alternative B states that "no predator management would be allowed," there is no doubt that this diversification will lead to predator conflicts that will lead to the inevitable cries from ranchers about the need to implement predator controls-i.e., kill the Park's native wildlife. Even if the Park Service stood its ground, the Park does not have adequate staff to ensure that predator control measures are not in fact carried out by ranchers. The DEIS also provides no evidence to suggest that the ranchers will not continue with their long-history of non-compliance with lease and permit conditions.

As importantly, the history of the Park strongly suggests that it is much more likely that the NPS will ultimately comply with requests for predator control. Indeed, given that Alternative B directs the killing of scores of iconic, native Tule Elk that are found nowhere else in the wild to protect rancher profits, it is hard to fathom how or why the Park Service would not also approve the killing of bobcats, mountain lions, hawks, owls, and other predators to protect rancher profits.

Predator control efforts would have direct impacts on wildlife species, and could affect the role that the Park's predators play in maintaining healthy wildlife populations and preserving native habitat. The NPS has direct experience with the role of predator populations in improving ecosystem health, including through the successful reintroduction of wolves in Yellowstone National Park. As recently reported, Yellowstone, wolves "are causing a trophic cascade of ecological change, including helping to increase beaver populations and bring back aspen, and vegetation." <https://www.yellowstonepark.com/things-to-do/wolf-reintroduction-changes-ecosystem>

This has been confirmed by a recent study:

"The reintroduction of gray wolves (*Canis lupus*) to Yellowstone National Park is the most celebrated ecological experiment in history. As predicted by population models, the rapid recovery of a wolf population caused both temporal and spatial variability in wolf-ungulate interactions that likewise generated temporal and spatial variation in the expression of trophic cascades. This has amplified spatial variation in vegetation in Yellowstone, particularly with willow (*Salix* spp.) and cottonwood (*Populus* spp.) in riparian areas, with associated changes in food webs. Increasing influences of grizzly bears (*Ursus arctos*), cougars (*Puma concolor*), and bison (*Bison bison*) are making what initially was predominantly an elk-wolf interaction into an increasingly complex system."

Mark S Boyce, Wolves for Yellowstone: dynamics in time and space, *Journal of Mammalogy*, Volume 99, Issue 5, 10 October 2018, Pages 1021-1031, <https://doi.org/10.1093/jmammal/gyy115>.

The cascading benefits of healthy predator populations are not limited to Yellowstone. For example, a 2010 scientific study concludes that:

"Predators tend to be valued for the provision of three broad services: their ability to regulate prey populations (Halpern et al. 2005; Dobson et al. 2006), as indicators of high species richness that warrant conservation (Sergio et al. 2006) and, given their charismatic nature, their economic contribution to recreation and ecotourism (Dobson et al. 2006). Unfortunately, this valuation of predators treats their losses merely as early indicators of environmental destruction that may lead to the eventual loss of species in lower trophic levels."

\* \* \*

"Mounting research reveals that top predators can have cascading effects that extend beyond their prey base to impact on ecosystem nutrient dynamics that may then feed back upward to influence the biological productivity. Ignoring this connection may mean that an important functional role of predators in ecosystems remains grossly undervalued, especially given that nutrient cycling is deemed to be among the most valuable of all ecosystem services (Costanza et al. 1997)."

Oswald J. Schmitz, Hawlena D., Trussell G.C., Predator control of ecosystem nutrient dynamics, *Ecology Letters*, (2010) 13: 1199–1209, doi: 10.1111/j.1461-0248.2010.01511.x

As another study aptly concludes:

"Current ecological knowledge indicates that large carnivores are necessary for the maintenance of biodiversity and ecosystem function. Human actions cannot fully replace the role of large carnivores. Additionally, the future of increasing human resource demands and changing climate will affect biodiversity and ecosystem resiliency. These facts, combined with the importance of resilient ecosystems, indicate that large carnivores and their habitats should be maintained and restored wherever possible."

W. J. Ripple et al., Status and Ecological Effects of the World's Largest Carnivores, *Science* 343, 1241484 (2014). DOI: 10.1126/science.1241484

### 3. Alternative B Will Increase Habitat Loss, Degrade Water Quality, Increase Greenhouse Gas Emissions, and Make the Park Less Resilient to Climate Change

The DEIS and other studies document the extensive damage that ranching and dairy operations have caused to the Park and to the wildlife that rely on it. Impacts from the Park's industrial scale agriculture are well documented and include: soil erosion, water pollution, loss of native plant species and infestation by invasive plants, declines in fish and bird populations, conflicts with wildlife, and loss of public access to public land.

For example, the heart of the Park—once a rare coastal prairie ecosystem—has been trampled and transformed by the Park's long history of industrial agriculture. Native coastal prairie is dominated by long-lived perennial bunchgrasses, such as Purple needlegrass, California fescue, and California oatgrass which can stay green year-round with the moisture provided in the fog belt. However, within the Park's "pastoral" zone, these species have been replaced by European annual grasses dominated by Italian thistle, milk thistle, and poison hemlock invading pastures. By contrast, at Tomales Point where elk graze and fences keep the cattle out, native vegetation is starting to return. Some other areas in the Park not grazed by cattle also hold examples of relict native perennial grasses.

Cattle manure is the Park's single largest source of water pollution, and studies show that the Park has some of the worst water pollution in the state of California. The NPS Coastal Watershed Assessment for PRNS (2013) found severe pollution problems in streams near commercial dairies. Some of these bodies of water measured double the lethal level for freshwater fish. Exceptionally high nitrate and ammonia and sub-optimal dissolved oxygen samples have also been identified at a number of dairy operations. Many sites in these watersheds exceeded the fecal coliform standard more than 50 percent of the time. Streams and tributaries leading to Drake's Estero, adjacent to

a number of the dairies (A Ranch, B Ranch, and C Ranch), all had a significant number of dissolved oxygen samples below the optimum range, posing a threat to fish in these streams and Drake's Estero.

The NPS has also found that spreading manure on pastures correlates with an increase in invasive and noxious weed species. The commercial cattle operations at Point Reyes National Seashore produce so much manure that the volume of animal waste itself is a cause for concern.

Methane, produced by cattle, is a greenhouse gas that is 25 to 100 times worse for climate change than carbon dioxide. In 2008, Greenhouse gas (GHG) emissions within the Seashore totaled 20,239 metric tons of carbon dioxide equivalent, with a full 62 percent of this attributed to agricultural operations in the Park. The NPS had set a goal of a 25 percent reduction of 2008 GHG levels from agriculture by 2016. Alternative B will not reduce GHG emissions in the Park.

The additive and magnifying effects of climate change on both resident and migratory wildlife species that rely on Point Reyes National Seashore are also of critical concern. As recognized by the United Nations Environment Program and the Convention on the Conservation of Migratory Species of Wild Animals, migratory wildlife is particularly vulnerable to the impacts of climate change:

"As a group, migratory wildlife appears to be particularly vulnerable to the impacts of Climate Change because it uses multiple habitats and sites and use a wide range of resources at different points of their migratory cycle. They are also subject to a wide range of physical conditions and often rely on predictable weather patterns, such as winds and ocean currents, which might change under the influence of Climate Change. Finally, they face a wide range of biological influences, such as predators, competitors and diseases that could be affected by Climate Change. While some of this is also true for more sedentary species, migrants have the potential to be affected by Climate Change not only on their breeding and non-breeding grounds but also while on migration."

"Apart from such direct impacts, factors that affect the migratory journey itself may affect other parts of a species' life cycle. Changes in the timing of migration may affect breeding or hibernation, for example if a species has to take longer than normal on migration, due to changes in conditions en route, then it may arrive late, obtain poorer quality breeding resources (such as territory) and be less productive as a result. If migration consumes more resources than normal, then individuals may have fewer resources to put into breeding . . . ."

\* \* \*

"Key factors that are likely to affect all species, regardless of migratory tendency, are changes in prey distributions and changes or loss of habitat. Changes in prey may occur in terms of their distributions or in timing. The latter may occur though differential changes in developmental rates and can lead to a mismatch in timing between predators and prey ("phenological disjunction"). Changes in habitat quality (leading ultimately to habitat loss) may be important for migratory species that need a coherent network of sites to facilitate their migratory journeys. Habitat quality is especially important on staging or stop-over sites, as individuals need to consume large amounts of resource rapidly to continue their onward journey. Such high quality sites may [be] crucial to allow migrants to cross large ecological barriers, such as oceans or deserts."

UNEP/CMS Secretariat, Bonn, Germany, Migratory Species and Climate Change: Impacts of a Changing Environment on Wild Animals (2006) at 40-43 (available at [http://www.cms.int/publications/pdf/CMS\\_CimateChange.pdf](http://www.cms.int/publications/pdf/CMS_CimateChange.pdf)). Migratory birds are at particular risk from climate change. Migratory birds are affected by changes in water regime, mismatches with food supply, sea level rise, and habitat shifts, changes in prey range, and increased storm frequency. Id.

The NPS recognizes that implementing "adaptation strategies that promote ecosystem resilience and enhance restoration, conservation, and preservation of park resources" is a key goal of the Park Services' Climate Change Response Strategy. That strategy also requires the NPS to "incorporate climate change considerations and responses in all levels of NPS planning" and "implement adaptation strategies that promote ecosystem resilience

and enhance restoration, conservation, and preservation of park resources.” National Park Service Climate Change Response Strategy (September 2010) at 14-15. It is clear, however, that Alternative B will not promote ecosystem resilience and enhance restoration, conservation, and preservation of park resources. Alternative B will not make the Park ecosystem more resilient to climate change.

Alternative B will make the already significant direct, indirect, and cumulative adverse impacts of the current ranching practices much worse. The DEIS also fails to address or discuss mitigation measures to offset any of the environmental harm caused by Alternative B, including mitigation for any impacts on climate change.

#### 4. Alternative B Will Cause Significant Harm to the Visitor Experience

As a long-time visitor to Point Reyes National Seashore, I strongly disagree with the DEIS conclusion that Alternative B “would contribute noticeable beneficial impacts by providing a wider range of recreational and educational opportunities in the planning area.”

I come to the Park to see its wildlife and hike its untrammelled beaches and trails. In an ideal world, I would also see restored native coastal prairie and a Park free from invasive species. I most definitely do not come to the Park to see cattle, cows, mud lots, and dilapidated housing. I do not come to the Park to smell manure being sprayed through the air before it makes its way into the Seashore’s streams, bays and coastal waters. I do not come to the Park to see industrial scale agriculture that is carried out on the backs of the federal taxpayers to benefit 24 leaseholders.

There quite literally has not been a single occasion when I have driven past the dairy and ranching operations in the Park when I have not been affected and highly disturbed by the ecological damage, and the inappropriateness of conducting industrial agriculture in the Seashore. The adverse impacts of the dairy and ranching activities on my experiences in the Park have not lessened over time, they have grown worse as the environmental damage and squalor have grown.

If Alternative B is adopted, my visitor experience will be made much worse because I will know that:

- The majestic Tule Elk are being killed on a regular basis to allow even more agricultural activities. There are many locations where the public can see farms and ranches in California and across the west. The Park is only one place where the public can see Tule Elk roaming free.
- The Park Service has deliberately increased the likelihood of ranchers complaining about predator impacts and requesting the ability to implement predator “controls.” These complaints and requests are almost certain to lead to even more killing of the native wildlife that I come to the Park to see.
- The Park Service has voluntarily approved even more industrial scale agriculture that will continue to significantly degrade the ecological health of the Park and eliminate opportunities to improve the health of the Park.
- In adopting Alternative B, the Park Service has ignored the interests of the public in a healthy, vibrant and resilient Park and has instead opted to sacrifice the Park and scarce taxpayer resources to benefit a handful of highly subsidized ranchers.

#### 5. Alternative B (and Any Alternative that Continues Ranching) is Contrary to the Mandates of the Point Reyes National Seashore Authorizing Legislation and the NPS Organic Act

The 1916 National Park Service Organic Act, which applies to all units of the National Park System, requires NPS to conserve the scenery, wildlife, and other natural resources, to provide for the public’s enjoyment of such resources, and to leave such resources “unimpaired for the enjoyment of future generations” by prohibiting uses that cause “unacceptable impacts.” 54 U.S.C. § 100101(a). It also provides that grazing can be authorized only when such use is not detrimental to the primary purpose for which the park unit was created. 54 U.S.C. § 102101(a)(2).

Point Reyes National Seashore was created “to save and preserve, for the purposes of public recreation, benefit, and inspiration” a portion of the nation’s diminishing seashore. 16 U.S.C. § 459c. The Seashore’s 1962 authorizing

legislation requires the Park Service to administer the Seashore “without impairment of its natural values” and in a manner that is “supportive of the maximum protection, restoration, and preservation of the natural environment.” 16 U.S.C. § 459c-6 (emphasis added).

This mandate clearly grants the Secretary the authority to end ranching in the Park. That authority was bolstered by a 1978 amendment to the Seashore’s authorizing legislation that explicitly allows the Secretary to reject leases that are not consistent with the purposes of the Park’s authorizing legislation. That amendment provides that “[w]here appropriate in the discretion of the Secretary, he or she may lease federally owned land . . . which was agricultural land prior to its acquisition. Such lease shall be subject to such restrictive covenants as may be necessary to carry out the purposes of . . . [this law].” 92 Stat. 3467 (1978). Under this language, the Secretary may issue a lease only if the lease can be operated without impairment to the park’s natural values. This legislation absolutely does not mandate that the land remain in agricultural use.

Alternative B, on the other hand, continues ranching in the Park when such activities are undeniably impairing the Park’s natural values. Alternative B goes even further by committing the Park to perpetual ranching through changes to the longstanding “succession” requirements. As part of an early accommodation to the ranchers who sold their land to the Park, the ranchers were allowed to lease back their land for 25 years or, in some cases, for their lifetime in addition to receiving generous compensation for their lands (the equivalent of \$340 million in today’s dollars). The NPS later agreed to allow ranchers’ offspring to stay on in the Park as long as they continued ranching. After that, the ranches would be retired. However, under Alternative B, the NPS will not retire the ranches when the offspring of the ranchers retire. Instead, it will offer those leases to other relatives; and if they decline, to neighbors; and if they decline, to anyone who wants to lease land in the park—no prior connection to the Seashore would be required.

Alternative B ignores the fundamental mandates of the Seashore’s authorizing legislation and the NPS Organic Act by approving continued ranching in a manner guaranteed to cause unacceptable impacts to the Park’s natural resources and wildlife, and by permanently committing the Park to ranching.

#### 6. Alternative B Sacrifices the Environment and Taxpayer Dollars to Subsidize Ranch Profits

Between 1962 and 1978, 27 ranches were purchased for the newly created Point Reyes National Seashore. Ranchers were paid \$57 million for their land, which is equivalent to more than \$380 million today, (calculated based on dollar values in 1970). Livingston, D. (1993). *Ranching on the Point Reyes Peninsula: A History of the Dairy and Beef Ranches Within Point Reyes National Seashore, 1834-1992*. Point Reyes National Seashore, Point Reyes, California.; Sadin, P. (2007). *Managing a Land in Motion: An Administrative History of Point Reyes National Seashore* Historical Research Associates, Inc., Seattle, Washington.

Ranchers in the Park continue to be highly subsidized. For example, they:

- Receive heavy discounts on grazing fees, paying just \$7-\$9 per animal while ranchers outside the park pay \$15-\$20;
- Pay no property taxes because they live and work on federal land; and
- Pay rent for NPS-owned houses at rates far below market value in Marin County.

Ranchers in the Seashore also get significant help from the NPS towards the basic cost of doing business, despite the dwindling budget of the NPS and scarce staff and staff resources. For example, the NPS:

- Repairs park roads damaged by heavy trucks serving dairy and beef ranches;
- Installs and maintains fences to avoid conflicts between wildlife and cattle, and people and cattle;
- Replaces and repairs roofs, barns, and other infrastructure at ranch residences;
- Monitors and manages ranches for lease-compliance;
- Evaluates the impacts of ranch operations to park resources; and
- Hazes elk off pastures leased to ranchers.

The National Park Service has not provided any information on the dollar amount or portion of its budget that goes to ranching-related expenses. However, the DEIS has acknowledged that the NPS has already paid almost \$1 million in costs associated with developing the DEIS (\$955,000).

Ranching places increasing demands on dwindling park budgets, while park improvements and a backlog of maintenance, along with public programs and interpretation, go unfunded. Meanwhile, scarce resources go to support 24 ranchers operating in the Seashore, including killing wildlife to benefit their operations. Ranching's environmental impacts also have an untallied economic impact on the Seashore. Internal Park Service memos indicate monitoring the ranches for lease compliance and environmental damages already places outsized demands on the Seashore's staff and budget, even as the NPS has failed to enforce lease agreements when leases are violated.

Alternative B would continue to subsidize industrial agricultural activities in the Park at the grave expense of the ecological health of the Park and its wildlife and the visitor experience.

Conclusion I strongly oppose Alternative B and urge the NPS to abandon that alternative. The NPS should instead adopt Alternative F as the final selected alternative.

Thank you for your consideration of these comments.

Sincerely,

Melissa Samet

#7493

Name: Nunes, Lianne

Correspondence: To Whom it May Concern,

We appreciate the opportunity to provide comments on the draft Environmental Impact Statement (EIS) for a General Management Plan Amendment (GMP Amendment) for Point Reyes National Seashore (PRNS) and the North District of Golden Gate National Recreation Area (GGNRA).

We fully support continued ranching in the Point Reyes National Seashore (PRNS). Our family continues to pledge our commitment to our current practices of dairy and cattle ranching on our leased land in the project area. We value our family's history in the PRNS and the opportunity to have continued the operations for the last 100 years. We recently became a part of a local, sustainable, quality brand through Straus Family Creamery, where our milk and subsequent dairy products reach consumers nation-wide. We are continually committed to land stewardship, conservation and resource management through our ranching efforts, which we aim to bring value to the products SFC sells and the PRNS project area. The cultural and historic relevance of dairy and ranching in the PRNS are the main aspect making this location unlike any other and we are fully committed to continue to work together to improve our conservation and sustainability efforts to benefit this extremely unique and pristine National Park.

We support the letter submitted by Albert Straus and Alternative B - NPS Preferred Alternative in general. The letter submitted by Albert Straus articulates concerns we have in regards to meeting USDA NOP Organic Certification requirements, the impact the dairy and ranching operations have on the community and county, the positive effect livestock have on climate change, and the advantages of the availability to create a carbon farming plan. Alternative B creates an atmosphere to where all interested parties can coexist in a successful way, however, we do feel as if a few areas could use clarification and consideration. Those sections being the following:

- Public Use & Enjoyment - We believe the NPS should consider educational benefits of the diversification opportunities provided in Alternative B to further enhance visitor experience. This can be completed through



farm tours and on-farm sales. This would support the goals stated in the Purpose and Need section. We also request that the NPS clearly address and outline specific intentions and areas on a map intended for use for development for Public Use, specifically the plans in the Appendix E (Connect Drakes Beach to Drakes Estero using an old ranch road, Create a loop from D Ranch to Barries Bay-only under alternative C and alternative F, because of the potential to disturb elk). Understanding and communicating the intended improvements by the NPS in the project area to all stakeholders would be necessary for planning and logistical purposes. • Soils - Beneficial impacts to soils from carbon farming was not considered. Carbon farming provides ecological benefits that would improve soils, increase organic matter to benefit soil, water and air quality. Review and consultation in regards to the positive effects of Carbon Farming should be considered as a way to balance air quality and greenhouse gas emissions of agricultural operations and visitor impact in the project area.

We look forward to continued communication and partnership with the NPS and PRNS on this matter as our goal is shared: successful coexistence. We appreciate the invitation to provide input into the EIS/GMP Amendment and look forward to working with PRNS on all subsequent stages of this process.

Sincerely,

The Nunes Family Betty, Tim, Laura, Lianne & William Nunes GBT Nunes & Co Drakes View Dairy Historic A, E & D Ranches

#7494

Name: Horton, Nathanael

Correspondence: I oppose Alternative B. As it is, wildlife has been squeezed by agriculture and other human activities. Instead, the park should support wildlife with the Alternative F measure. All ranching should be phased out. I want the National Park Service to preserve the health and beauty of the NATURAL environment at POint Reyes: land, water, air, wildlife. Livestock has no place there. Activities that exploit the park's resources while degrading it have no place there. Cow pastures should be restored to pastoral zones for wildlife habitat, native plant communities, scientific research and education. Thank you.

#7495

Name: Morgan, Robert

Correspondence: As a property owner in san geronimo valley and previous hunter, i adamantly oppose the killing of our beloved tule elk herd, or any local wildlife, on behalf of ranching interests.

#7496

Name: McQuaid, Sean

Correspondence: "Climate change is fundamentally the greatest threat to our national parks," begins the Director of the National Park Service in the Climate Change Response Strategy issued by the National Park Service.

Just days ago millions around the globe marched for action on climate change. And today, the NPS - the stewards of our public lands - respond by continuing the advancement of a plan that contradicts the Mission of the National Park Service, violates the National Park Service Organic Act of 1916, and contravenes your Climate Change Response Strategy. Alternative B, the 'preferred alternative of the NPS,' absolutely does not "preserve unimpaired the natural and cultural resources and intrinsic values of the National Park System...for future generations."

Rather, Alternative B opens even more avenues for commercializing the Point Reyes National Seashore than even exist today by allowing for larger cattle herds, additional livestock farming, other commercial farming, and the possibility of B&Bs.

You point out in your Climate Response Strategy: "Most of the observed increase in global average temperatures since the mid-20th century is 'very likely' due to the observed increase in anthropogenic greenhouse gas concentrations," so how can the NPS favor a proposal that seeks to expand commercial agriculture, when we know it to be contributing to global warming?

Please comprehensively address the ways in which Alternative B aligns with your Climate Change Response Strategy. Just as one example, will the NPS mandate the ranches upgrade buildings and infrastructure to be sustainable?

Separately, but just as important: what measures will the NPS take to ensure that the Tule Elk have access to sufficient water resources over the next several decades to ensure that hundreds do not die as a result of being fenced in as happened between 2012-2014?

#7497

Name: Barnett, Paul

Correspondence: I am writing in support of managing Point Reyes National Seashore for the benefit a native flora and fauna, with the goal of reducing and eventually eliminating cattle grazing and other ranch activities.

Allowing cattle to browse in the seashore is harming rare plants, including beach layia, coastal marsh milkvetch, swamp harebell, Marin checker lily, North Coast phacelia, and the Point Reyes checkerbloom. Many other rare plant species are also being harmed. There are many areas in the park where the landscape is denuded of vegetation because of ranching activities.

I am especially opposed to the plan to reduce or even eliminate the Drake's Beach Tule Elk herd. In the words of the report, "removal of a native species for ranching considerations would be unprecedented in the national park system and would be inconsistent with state management of elk on ranchlands outside the park." The Drake's beach herd represents 2% of the Tule Elk in California. The 28,000 acres of cattle range land in the Pt. Reyes and Golden Gate National Parks represent 0.07% of the 38 million acres of cattle range land in California. While Tule Elk are a threatened species, milk and dairy products are in chronic oversupply. The plan to allow producers to diversify into other types of livestock is certain to create new, unanticipated harms.

Isn't the mission of the National Park Service, and the purpose of our natural parks, is to be the last refuge in wild? There is no mandate to continue agricultural enterprises, and these ranch leases should be discontinued as soon as possible. There is lots of ranch land, but only one Pt. Reyes National Seashore.

#7498

Name: Vivaldi, Greg

Correspondence: Give the ranchers 20 even 50 year leases. They are great stewards of the land. The elk can co exist, 125 should serve the tourists. You ran out the Oysters, don't do the same to the ranches. They are the history of our county.

#7499

Name: Molloy, Molly

Correspondence: I would like to recommend Alternative F: No Ranching.

I have been going to Pt. Reyes since the 1980s to enjoy the wildlife - the birds and the elk, the wide open spaces, and the seashore. All of this will be threatened by the continuation of ranching and the additional proposals, adding other animals, more farming, and visitor housing.

1. Environmental degradation has increased over the years. None of the alternatives discuss the impacts of expanded agricultural options on wildlife and natural resources. They do not discuss how to mitigate the destruction of the ecosystems or how to repair the damage that has been done. The EIS makes it clear that cattle ranching and dairy farming are bad for the environment and accelerate harm in our climate crisis. As a birder, I have always hated the smell of the ranches, especially when trudging through the muck looking for tri-colored blackbirds! Cattle ranching was never supposed to be permanent. Adding chickens and pigs is also bad for the environment. The water will be poisoned, as well as the land.

2. Historical resources - The ranch buildings and infrastructure are historic - not the cows. You can show the history of the park through maintaining one of these ranch buildings. The white huts for veal have always upset me. Ranching does not belong here.

3. Wildlife impacts - The Tule elk should not be removed, but set free. The EIS makes it clear that wildlife as well as the land and water will benefit from the cessation of ranching. There is no plan in your other alternatives for protecting wildlife from ranching's impacts. Birds are also having problems. This should be a safe place for them. Native wildlife should not have to compete with cows or other animals like chicken and pigs.

4. Purpose of parks - People need open space and parks. They are not made for business and should not be. Ranchers can go elsewhere - and pay market prices and taxes. They should not take advantage of the park.

After reading about this in the Point Reyes Light, I found other newspaper articles online. It was very hard to find information on the park website or the Point Reyes Seashore Association site. You could have had more comments with wider publicity.

PLEASE do not let this magical place be destroyed!

#7500

Name: Desai, Neal

Correspondence: September 23, 2019

Cicely Muldoon Superintendent Point Reyes National Seashore 1 Bear Valley Road Point Reyes, CA 94956  
Submitted via PEPC online

Re: NPCA comments on Pt Reyes National Seashore GMPA DEIS

National Parks Conservation Association (NPCA) and its members care deeply about the protection and enhancement of the Point Reyes National Seashore, and have engaged in significant efforts over the years to ensure this treasured landscape is protected for generations to come. NPCA is a non-partisan, non-profit organization that was formed in 1919, and with its more than 1.3 million members and supporters throughout the country, works to protect and enhance America's National Park System for present and future generations. We write to provide comments on the Point Reyes National Seashore General Management Plan Amendment Draft Environmental Impact Statement (DEIS).

We believe Alternative B incorporates science-based management regarding Tule Elk that can demonstrate the continued co-existence of wildlife, recreation, ranching, and the other values and uses of the Seashore.

However, the DEIS suffers from numerous problems, specifically around diversification, succession and transparency to the public, the owners of the Seashore, unfortunately undermining the Park Service's efforts to rebuild public confidence that the Seashore will be managed consistent with law, policy and science.

The Park Service should resolve these matters in its Final EIS. This is because the DEIS:

- Fails to provide an explanation of the Park Service's authority to allow the immense scale of diversification contemplated, considering the Seashore's authority to continue multi-generational beef and dairy ranching. Taking this a step further, the DEIS fails to provide any reasonable accountability to the public on diversification issues ranging from appraisals and on-site vs off-site activities to definitions and row crops. The problems are illustrated in the 9/23/19 Save Our Seashore comments on the DEIS's diversification proposal and we incorporate by reference those identified problems.

- Fails to explain how its economic rationale for diversification is supported by law or policy.

- Fails to explain the role of NEPA in analyzing individual diversification proposals and cumulative impacts, and how the diversification plan is not a form of piecemealing. Diversification proposes environmental impacts, some potentially very significant, including but not limited to conflicts with wildlife, wildlife habitat and recreation, yet the DEIS is silent on this environmental analysis. As an example, the DEIS contemplates turning the Seashore into an industrial pig farm, with what appears to be a lack of limit and no meaningful analysis on the environmental risks of introducing this animal to the landscape. As another example, the DEIS suggests guard animals could be appropriate, which confirms that impacts from diversification are potentially significant requiring mitigations that themselves create other potentially significant impacts on wildlife and visitors.

- Lacks adequate discussion on how described anticipated/contemplated/proposed and unknown, future diversification proposals would be consistent with NEPA, the NPS Concession Act and other laws and policies.

- Fails to ensure public disclosure and opportunity for public review of Ranch Operating Agreements prior to their finalization, so that management decisions impacting these public lands are not conducted in a vacuum only involving the Park Service and individual ranchers. As well documented in prior letters from the public to the Park Service, unauthorized activities at the Seashore have occurred in the past and the problems were only identified by the Park Service as a result of being alerted by members of the public. The need to increase transparency should be embraced by Seashore ranchers who wish to increase public confidence that ranching operations in this national park is appropriate and respectful of the environment.

- Fails to protect taxpayers, the owners of the Seashore, from failure of rancher that could lead to significant costs, such as environmental clean-ups and removal of abandoned structures and property. A bond mechanism could help address this matter.

- Fails to provide milestones for implementation of Best Management Practices, a purported justification of long-term leases, denying the public any assurance that important environmental improvements will be on the horizon.

- Fails to safeguard the public interest and congressional intent of multi-generational ranching. The DEIS' proposal undermines this through creating a bidding process wholly unrelated to multi-generational ranching. The DEIS should ensure that when a leaseholder or approved multi-generational successor decides not to continue, the NPS retains jurisdiction to evaluate environmental conditions, conduct appropriate planning processes, and determine how that land should be managed. The outcome may be grazing in some fashion, for example commercial or conservation grazing in part or full, but it also may not. Such retention of jurisdiction by the NPS ensures science-based decision-making and sound public policy considering the Park Service's mission and diverse goals of the Seashore. If after due diligence, the Park Service determines that some form of grazing should continue, then the Park Service should first consider evaluating if the lands could be used for forage mitigations from potential elk impacts rather than a net increase in cattle and rather than a free-for-all, arbitrary bidding process within the Seashore as currently proposed.

- Lacks any discussion of how the park plans to fund the implementation of the plan.

NPCA's colleagues at Save Our Seashore and the Environmental Action Committee of West Marin have detailed other important concerns and opportunities for the Park Service to consider.

Thank you for your efforts, Neal Desai

#7501

Name: Ravizza, Barbara

Correspondence: September 23, 2019 GMPA c/o Superintendent Cecily Muldoon Point Reyes National Seashore  
1 Bear Valley Road Point Reyes Station, CA 94956

Subject: Review Comments on the Point Reyes National Seashore General Management Plan Amendment - Draft  
Environmental Impact Statement

Dear Superintendent Muldoon:

Introduction

Thank you for this opportunity to provide comments on the Draft Environmental Impact Statement [DEIS] for the North District of the Golden Gate National Recreation Area and the Point Reyes National Seashore [GGNRA/PRNS] General Management Plan Amendment [GMPA]

Following these comments is a copy of our November 15, 2017 Scoping Comments, which are incorporated in their entirety herein by reference, in which we urged that:

". . . in at least one alternative (a) the scope of the proposed amendment be expanded to include all of the lands within the Olema Valley and Point Reyes Historic Districts, whether or not currently in ranching, (b) elk be fenced out of the pastoral zone on the Point Reyes peninsula and (c) consideration be given to the climate benefits of encouraging the ranchers to implement best management practices that increase carbon sequestration in the soil."

We are pleased to see that in the preferred alternative the GMPA/DEIS addresses to some extent the climate benefits of permitting ranchers to implement best management practices on the ranches. We support the Marin Conservation League and MALT recommendations for improving on these provisions. The following comments focus on the failure to include within the scope of the preferred GMPA alternative all of the lands within the two historic ranch districts and lands in the Wilderness Area to the extent the future of tule elk at Point Reyes is inextricably linked to conditions in the adjacent Wilderness Area.

Expansion of Scope of Proposed Amendment to All Lands in Historic Ranch Districts:

In our scoping comments, we asked that the National Park Service [NPS] expand the scope of the proposed GMPA to include all lands in the Point Reyes and Olema Valley Historic Ranch Districts. Some of these ranches have been acquired since the 1980 General Management Plan for the GGNRA/PRNS [1980 GMP] was published. Furthermore, conditions on or uses of some of the historic ranches included within the 1980 GMP have changed without prior environmental review. Expanding the scope of the GMPA to include all lands within these historic districts could lead to the following benefits:

" Restoration of ranching and/or dairying on ranches in the Olema Valley Historic Ranch District, which would also increase the contribution of agricultural production in the parks to the local community and economy while meeting the larger goal of preserving these cultural and historic resources;

" Would reduce management demands upon NPS staff, which are already in excess of capacity as evidenced by such examples as the sad and deteriorate condition of the once beautiful and historic Randall House, the Wilkins Ranch, and the nonnative species visible along Highway One south of Olema; and

" Perhaps the most compelling reason for expanding the scope of the GMP Amendment is the need to have the lands on the east side of Highway One grazed and managed in an environmentally sound way to reduce the fire fuel load and consequent threat to the urban areas in East Marin and the San Geronimo Valley. The purpose of a General Management Plan [GMP] is to set the long-term goals for the park . . . Section 2.2 Major Elements of Park Planning and Decision Making, at page 24. [www.nps.gov/policy/MP\\_2006.pdf](http://www.nps.gov/policy/MP_2006.pdf). Section 2.3.1.2 Management Zoning requires the NPS to develop:

". . . a map that delineates management zones or districts that correspond to a description of the desired resource and visitor experience conditions for each area of the park. Management zoning will outline the criteria for (or describe the kind of) appropriate uses and facilities necessary to support these desired conditions. For example, highly sensitive natural areas might tolerate little, if any, visitor use, while other areas might accommodate much higher levels of use. . . . [https://www.nps.gov/policy/MP\\_2006.pdf](https://www.nps.gov/policy/MP_2006.pdf)."

Despite these NPS requirements, ranchlands acquired by the NPS since 1980 are currently managed by staff without the benefit of a public planning process or prior environmental review. Historic ranch buildings in the Olema Valley south of Five Brooks, an area the 1980 GMP calls a natural zone, have been allowed to deteriorate, e.g., the historic Randall House in the Olema Valley, which itself has been determined to be eligible for the National Register of Historic Places and the Wilkins Ranch are the most obvious examples of ranches allowed to deteriorate despite the fact that conditions have changed in the 39 years since the 1980 GMP was released. And the Jewell Ranch in the Olema Valley Historic Ranch District is an example of a ranch which the NPS ceased leasing without prior environmental review.

The lease for what was an exceptionally well-maintained Wilkins Ranch and related cultural landscape was terminated in 2001 on the grounds that the 1980 GMP required it become an educational center if more educational facilities were needed. The 2001 Environmental Assessment [2001 EA] touted new trails and more public access as well as an education center. We understand that there was not an adequate source of water to support the proposed educational facility. In the absence of an educational facility, or a rancher responsible for maintaining the ranch, the ranch-related buildings and cultural landscape have deteriorated. Trails maintained by the former tenant have become unusable. The new rails promised in the 2001 EA were not created. There is less public access. There is a dangerous fire fuel load on the slopes up the Inverness Ridge that adjoin the Marin Municipal Water District land that connects over the hill into densely populated east Marin. A channel for saltwater that created a wetlands and fish habitat at the intersection of the Bolinas/Fairfax Road and Highway One formerly maintained by the rancher, is clogged by willows and brush.

If the scope of the GMPA is expanded to include all ranches in the historic ranch districts, consideration would be given to returning the Wilkins ranch to active ranch use. Interestingly, in dismissing comments suggesting that NPS consider an alternative that manages park lands as stated in the proposed action for the 1980 GMP, the DEIS acknowledges that, among other things the presence of National Register historic districts has rendered inappropriate elements in the 1980 GMP:

"Since the 1980 GMP was released, other elements of the 1980 GMP are no longer feasible or appropriate because new and different issues and objectives have arisen, and new information is available to inform decision-making (e.g., the presence of National Register historic districts and a free-ranging elk herd in the planning area)." [DEIS page 59]

The Jewell Ranch, atop the Inverness Ridge near the western mouth to the San Geronimo Valley, is an example of a ranch, which, in recent years the NPS ceased to lease for ranching without prior environmental review. As a consequence, the ungrazed land has been taken over by coyote bush, thistles and other highly flammable vegetation and poses a fire danger to densely populated neighborhoods in the San Geronimo Valley to the east. The Jewell Ranch is within the Olema Valley Historic Ranch District, but since it is no longer actively ranched, it is not included in the GMPA.

Finally, there are two popular trailheads in the Olema Valley that provide access for hikers, bikers and equestrians to cross over Highway One between trails in the PRNS and the GGNRA, one at the foot of the Randall Trail, the other at Dogtown. Expanding the scope of the GMPA would allow the NPS to address a means to provide more and safer parking and crossings at these trailheads.

#### Improve Elk Habitat in Wilderness and Fencing

NPS dismisses comments recommending that habitat in the Phillip Burton Wilderness Area [Wilderness] be improved so the elk will cease moving from the Wilderness area onto the ranch lands. The reasons given include that manipulation of wilderness is inconsistent with the Wilderness Act; the unsubstantiated claim that improving the habitat in the Wilderness would increase the productivity of the herds and result in more encroachment on the ranches; and that the Limantour portion of the Wilderness is outside the scope of the EIS. [DEIS page 80.]

Many, if not all, of the elk from the Muddy Hollow/Limantour herd that move into the pastoral zone also spend time in the Wilderness area. These two habitats are inextricably linked within the lives of the elk.

At a minimum, the DEIS should be expanded to assess how conditions in the Wilderness impact the elk herds, which could inform methods of controlling the elk in the pastoral zone. Section 6.3.2 in the 2006 Management Policies provides:

"As appropriate, wilderness monitoring programs may assess physical, biological, and cultural resources and social impacts. Monitoring programs may also need to assess potential problems that may originate outside the wilderness to determine the nature, magnitude, and probable source of those impacts." The 2006 Management Policies require the NPS to develop and maintain a wilderness management plan or equivalent planning document. Section 6.3.4.2., page 81. However, there is no management plan for the Wilderness area at Point Reyes. And much of the vegetation in the Muddy Hollow/Limantour Area has changed significantly since the free ranging herd of Tule elk was moved there 20 years ago on the basis of an Environment Assessment. Furthermore, the Natural Resource Management Chapter of the 2006 Management Policies, Section 6.3.7, contemplates management actions within wilderness areas:

"Management actions, including the restoration of extirpated native species, the alteration of natural fire regimes, the control of invasive alien species, the management of endangered species, and the protection of air and water quality, should be attempted only when the knowledge and tools exist to accomplish clearly articulated goals." The 2006 Management Policies specifically recognize that management actions may be necessary in wilderness areas to deal with the risk of fire. Reducing the fire fuel load in the Limantour/Muddy Hollow area would improve habitat for Tule elk while reducing the fire hazard in West Marin:

"Guidance on the need to suppress wildland fire or to use some wildland fires to achieve desired future conditions should appear in the parks planning documents (for example, in the wilderness management plan and fire management plan). Information in these documents will guide managers in the selection of fire management tactics that protect natural and cultural resources from fire and from fire suppression actions." [Emphasis added, 2006 Management Policies Section 6.3.9.]

#### NPS Has Authority to Expand the Scope of the Geographic Area Considered

There is nothing in the Settlement Agreement that precludes NPS expanding the scope of the GMPA to provide management guidance for the Wilderness Area. Section A, paragraph 1 in the July 14, 2017 NPS Settlement Agreement with the Resource Renewal Institute, et al, [Agreement] provides in relevant part;

". . . NPS shall prepare a GMP Amendment and an EIS that, at a minimum, addresses the lands currently leased for ranching in Point Reyes and in the north district of Golden Gate National Recreation Area. [Emphasis added.]

Further, Section A, paragraph 2 provides that the Agreement does not preclude NPS from exercising its lawful discretion to consider, and expressly preserves, NPS 's right to examine other potential action alternatives.

Respectfully submitted,

Barbara Ravizza, President Marinwatch

"Attachment" -

MARINWATCH November 15, 2017

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

Dear Acting Superintendent MacLeod:

Introduction:

Thank you for this opportunity to provide comments during the first phase of the process for amending the 1980 General Management Plan for the lands in Marin managed by the Point Reyes National Seashore. For reasons discussed below, we urge that in at least one alternative (a) the scope of the proposed amendment be expanded to include all of the lands within the Olema Valley and Point Reyes Historic Districts, whether or not currently in ranching, (b) elk be fenced out of the pastoral zone on the Point Reyes peninsula and (c) consideration be given to the climate benefits of encouraging the ranchers to implement best management practices that increase carbon sequestration in the soil. In all other respects we concur in the comments offered by the Marin County Board of Supervisors and the Marin Conservation League.

Specific Comments:

Expansion of Scope of Proposed Amendment:

There are lands added to the Golden Gate National Recreation area managed by the PRNS since the 1980 GMP was released. Some of these lands were being ranched when they were acquired by the NPS but are not currently ranched. They will continue to be managed without the guidance of a general management plan unless the scope of the current process is expanded to include all lands in these Historic Districts and more recently acquired agricultural lands in the GGNRA that are managed by PRNS. A detailed plan for managing lands not currently in ranching could be deferred until the GMP Amendment for the ranches within the scope of the settlement agreement is completed.

Ranching and dairying on the greatest acreage possible as authorized in legislation creating the PRNS and GGNRA will assure the continued and increased contribution of agricultural production in the parks to the local community and economy and meet the larger goal of preserving these cultural and historic resources. It will also reduce the management demands upon NPS staff, which are already in excess of capacity as evidenced by such examples as the sad and deteriorated condition of the once beautiful and historic Randall House, the Wilkins Ranch, which was to become more accessible to the public as an environmental education center, and the nonnative invasive species visible along Highway One south of Olema.

Perhaps the most compelling reason for expanding the scope of the GMP Amendment is the need to have the lands on the east side of Highway One grazed and managed in an environmentally sound way to reduce the fire fuel load and consequent threat to the urban areas in East Marin and the San Geronimo Valley. The recent wildfires that destroyed so much of the inhabited areas in Sonoma and Napa Counties are a fierce cautionary tale.



For planning purposes, both the 1980 GMP and the unreleased draft 1980 GMP Update include what is called a Natural Zone. Implicit in this description is an assumption that managing land for agricultural purposes harms the land:

These areas are outside of wilderness, but would be managed to minimize adverse impacts caused by human activity to the greatest extent possible. In most cases, areas in the Natural Zone would not be as undisturbed as areas within the Wilderness Zone. Grazing activities could take place within the Natural Zone when used as a treatment tool for resource management. [Emphasis added.]

Despite the implicit assumption that land is best left unmanaged, the definition acknowledges that grazing can be a treatment tool for resource management. Realistically, does the PRNS have the staff and other resources necessary to sporadically use grazing as a resource management treatment tool? Would the PRNS competitively bid the opportunity to temporarily bring cattle in to graze on the ranches in the southern part of the Olema Valley? Would this require preparing an Environmental Assessment first? If cattle are brought in too late, and the vegetation has become woody, cattle won't eat it. The fire fuel load that had developed will continue to increase if these lands remain unmanaged. These unmanaged lands are also a haven for invasive plant species. To see how invasive species spread on unmanaged land, take a hike through the formerly ranched Limantour Wilderness area where it is sometimes difficult at a distance to distinguish between a herd of elk and pampas grass.

Speakers at the November 2013 California-Pacific Society of Range Management meeting at the PRNS identified the benefits of managed grazing as including "ecosystem services, food production, preservation of view sheds and heritage values, fire fuel load reduction, wildlife habitat and the potential for carbon sequestration. See the report in the Marin Conservation League Jan/Feb 2014 Newsletter, beginning on page 6:  
[www.marinconservationleague.org/images/stories/Newsletters/nl14a\\_janfeb2014\\_forweb.pdf](http://www.marinconservationleague.org/images/stories/Newsletters/nl14a_janfeb2014_forweb.pdf)

In addition, Sheila Barry, a Natural Resource and Livestock Advisor for the U.C. Cooperative Extension, who has been conducting applied research on grassland and oak woodland management for over 20 years, observed in a May 2015 Bay Nature article reasons why Public Lands Need Cattle to Meet Conservation Goals:

. . . the stewardship provided by ranchers on public lands is a significant benefit that is often overlooked. Ranchers pick up trash, watch for wildfires, talk to and help visitors, repair fences, roads and trails, and report problems at a time when budgets for park rangers and maintenance are reduced.

As Ms. Barry also said in her Bay Nature article: Concerns with grazing on public lands have focused on overgrazing and impacts to riparian woodlands. These are legitimate concerns, but have been effectively addressed with modern range management practices, such as maintaining proper stocking rates, creating riparian pastures, limiting grazing in sensitive areas and adding off-stream water sources.

The assumption that managing land for agriculture necessarily has adverse impacts is both wrong and out-of-date. It is not supported by the science of good soil and land management. There is a world of literature on the environmental benefits of managing rangeland. For example, see the conservation benefits of invasive plant management in chapter 7 of this NRCS article:  
[www.nrcs.usda.gov/Internet/FSE\\_DOCUMENTS/stelprdb1045802.pdf](http://www.nrcs.usda.gov/Internet/FSE_DOCUMENTS/stelprdb1045802.pdf).

In a rebuttal article, Cattle Grazing Is Incompatible with Conservation, by Karen Klitz, of the Western Watersheds Project, and Jeff Miller, an advocate with the Center For Biological Diversity, a plaintiff in the case that led to the current environmental review process, the authors observed:

Public agencies simply do not have the staff or funding to properly monitor grazing operations, let alone reduce cattle damage or intensively rotate and manage cattle for beneficial impacts. The best-intentioned grazing management plans are often not carried out due to lack of monitoring, personnel, or funding, and can be abandoned or altered when committed and experienced project managers leave an agency. Meanwhile, our public lands suffer from soil erosion, impaired water quality, invasive weeds and damaged streams.

These remarks about public agencies not having the staff to properly monitor grazing operations are very relevant when the NPS is facing a 13% cut in a budget that is already insufficient to adequately manage the range lands land that are not in active agriculture. However, given the fire danger and the need for the stewardship services ranchers can provide, it becomes even more important to lease the Olema Valley lands for agriculture under terms that provide the benefits described in the NRCS article, including implantation of NRCS best management practices that increase the sequestration of carbon in the soil resulting in both healthier soil and a reduction in GHGs in the atmosphere.

The solution to the limitations on NPSs resources to oversee the operation of agricultural leases may lie with the Cuyahoga Valley National Park model, where the Park contracts with a nonprofit corporation to manage compliance with agricultural leases. It is an efficient and cost effective way to ensure compliance and would relieve the PRNS staff from the day-to-day responsibility for ensuring use of best management practices. It would also ensure that the ranchlands would be managed consistent with the high standards common to West Marin ranches. There are existing bodies capable of providing this service, e.g., the Marin Resource Conservation District and the Marin Agricultural Land Trust or another non-profit could be formed exclusively for this specific purpose if that were deemed more appropriate.

In addition to all of the other benefits, restoring the Olema Valley rangelands to agriculture would provide more opportunities for existing ranches to expand their capacity to support additional family members and create opportunities for new folks to become agriculturists in what otherwise becomes a closed society.

Restoring agriculture to these lands would also bring the NPS into compliance with the State of Californias Coastal Management Plan. The Federal Coastal Zone Management Act requires that Federal activities in a coastal zone be carried out in a manner which is consistent to the maximum extent practicable with the enforceable polies of approved State management programs. See 16 U.S.C. Section 1456(c)(1)(A). The California Coast Act provides that to the extent possible under Federal law, Federal agencies comply with the provision in the Coast Act. California Public Resources Code Section 300003. The same code provides in Section 30242 that:

All . . . lands suitable for agricultural use shall not be converted to nonagricultural uses unless . . . continued or renewed agricultural use is not feasible . . . .

Benefit of Fencing Elk Out of Historic Ranch Districts:

For all of the reasons the Marin County Board of Supervisors identified in their comments, [g]razing livestock and free-range elk are not compatible. Lands in the historic ranching districts should be given protection corresponding to their intended use and purpose as should lands in the area designated wilderness. In addition, one of the benefits of fencing the elk out of the pastoral zone is having more elk in the Limantour Wilderness to help keep the fire fuel load down. Instead of competing with the cattle for forage, the elk, which are both foragers and browsers, will necessarily feed more on the plentiful vegetation in the Wilderness. The PRNS may need to take additional steps to reduce the fire danger posed by the dense vegetation and dead and dying trees in the Limantour Wilderness but having additional elk at work on the vegetation would be a good starting point for addressing the problem that has only gotten worse since the disastrous 1995 Inverness Fire.

Mitigation of Ongoing Climate Effects:

The research in preparing the draft 1980 GMP Update could be very useful in preparing a GMP Amendment, but one area in the draft hat is clearly out-of-date is the proposed response to the threat of climate change. The unreleased draft focuses solely on the reduction of the carbon footprint of the Seashore. Thanks to research supported through the Marin Carbon Project since 2007, it is clear that instituting carbon farming practices through implementation of NRCS-recognized best management practices benefits soil health, improves wildlife habitat, and could offset all of the greenhouse gases generated in the course of managing the PRNS and by visitors to the PRNS. For history of the Marin Carbon Project, see [www.marincarbonproject.org/about](http://www.marincarbonproject.org/about).

Implementing the NRCS best management practices would go far beyond the current PRNS practice of implementing best management practices for the limited purpose of protecting sensitive resources including water quality and rare and endangered species. See the General Management Plan Amendment Frequently Asked Questions. In addition to the benefits identified earlier, applying NRCS best management practices will also protect sensitive resources and increase water retention in the soil thereby increasing the growing season and reducing the need to draw water from other sources. These effects are documented in studies by UC Berkeley College of Natural Resources Prof. Whendee Silver, among others. Selected publications by Dr. Silver are listed on: <https://ourenvironment.berkeley.edu/people/whendee-silver>.

The lands managed by the PRNS could become a model for the nation if the proposed GMP Amendment fully supports the long-term leases necessary for the ranchers to invest both capital and their sweat equity to implementing carbon-farming practices.

Respectfully submitted,

Barbara Ravizza, President

#7502

Name: Maghakian, Michael

Correspondence: Please adopt alternative F

preservation of native wild species must take precedence over farming and ranching activities. grazing negatively affects ecosystems, causing water pollution and soil erosion, spreading invasive species and disease, and harming endangered species

#7503

Name: Phelan, Alexandra

Correspondence: Cicely Muldoon, Superintendent Point Reyes National Seashore 1 Bear Valley Road Point Reyes Station, CA 94956

Dear Superintendent Muldoon,

I am writing today to express my strong support for "Alternative F" as outlined within the General Management Plan Amendment Draft Environmental Impact Statement for Point Reyes National Seashore and the North District of Golden Gate National Recreation Area. The significant adverse short- and long-term impacts of Alternatives A, B, C, D and E that are identified within the DEIS are unsatisfactory from the standpoint of compliance with laws and regulations, addressing public health & environmental quality concerns, and minimizing overall impacts to the integrity of our nations natural and cultural resources that the National Park Service is tasked to steward and preserve for future generations.

Further analysis and evidence is necessary to prove that any proposed ranching use in the DEIS is in conformance with the following laws and regulations:

**ENDANGERED SPECIES ACT (ESA)** The ESA requires NPS to ensure that actions they authorize, fund, or carry out are not likely to jeopardize the continued existence of any listed species or result in the destruction or adverse modification of designated critical habitat of such species. Alternates A-E should be expanded to detail how proposed agricultural activities in particular mowing, and spraying of manure, will not further the documented destruction of each of the more than fifty species of animals within PRNS that are listed by the state or federal government as threatened, rare or endangered.

Several studies have found that the agricultural practice of mowing (whether for silage or hay) is detrimental to breeding birds because nests, flightless young, and sometimes adults are destroyed. In a 2015 study conducted by Point Blue Conservation Science (PBCS) for the NPS, researchers found that mowed silage fields in Point Reyes National Seashore did not appear to be suitable for bird nesting. Alternates A-E should be adjusted to describe in detail how the NPS will eliminate or significantly alter the land use currently leased to silage mowing following the methodology and recommendations outlined in the PBCS study to prevent further destruction of critical habitat of species protected by the ESA.

In its Coastal Watershed Assessment for GGNRA and PRNS (2013) the NPS found that spreading manure on pastures correlates with an increase in invasive and noxious weed species, as well as degradation of riparian areas and creeks. Alternates A-E should be adjusted to describe in detail how the NPS will significantly alter the proposed manure management practices, or eliminate the production and untreated release of manure altogether, to avoid further degradation of critical habitat and invasion of non-native species. Current descriptions of mediative measures are wildly inadequate considering the noted significant adverse impacts on environmental resources, notably those of sensitive or endangered native species.

Chapter 3 of the DEIS regarding Federally Listed Wildlife states that the various listed endangered marine animals that use the beaches adjacent to the planning area are not included in this analysis because ranch activities would not affect these species in the planning area. This claim is not backed by scientific data and should be expanded with verifiable data or removed from the report and replaced with an adequate analysis of impacts. Per page 69 of the DEIS: 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). Potentially pathogenic bacteria and nutrient loading from non point sources associated with ranching activities (especially inadequate manure management practices) do not stop at the boundaries of the Planning Area and the impacts on critical habitats of surrounding federally listed species must be analyzed in more detail within the EIS to prevent noncompliance with ESA and other regulations.

Additional federally protected critical habitats of the following species were found to be within the Planning Area, but not annotated within Appendix Figure 46 nor described in Chapter 3 of the DEIS: Tidewater goby (*eucyclogobius newberryi*) Marbled Murrelet (*brachyramphus marmoratus*). Note that common ravens are one of the main predators of this endangered seabird species. These omissions should be corrected and adverse impacts of ranching on these critical habitats should be analyzed within the EIS.

**CLEAN WATER ACT (CWA)** As mentioned above, the Park Services 2013 Coastal Watershed Assessment for Point Reyes National Seashore documented numerous examples of cattle ranching polluting water resources in the park and identified bacterial and nutrient pollution from dairies and ranches as a principal threat to water quality. The Park Services assessment determined that dairies pollute the Drakes Estero, Limantour, Kehoe and Abbots Lagoon areas with high concentrations of fecal coliform. Other studies show that cattle ranches are one of the major contributors of fecal coliform and *E. coli* to Tomales Bay. Alternates A-E should be adjusted to describe in detail how the NPS will significantly alter the manure managements practices following the methodology and recommendations outlined in the Coastal Watershed Assessment to minimize impacts to coastal watersheds protected by the CWA.

**NATIONAL HISTORIC PRESERVATION ACT (NHPA)** Section 106 of the National Historic Preservation Act mandates NPS to "take into account" the effect a project may have on historic properties. Modern ranching and farming operations within the two historic districts conflict with the historic character defining features of the district from its period of significance. Notably, the highly prominent visual presence of white plastic veal crates in many of the view sheds within the historic district has a significant negative impact on the historic character of the districts. Additionally, commercial ranches eliminate public access to the historic resources of the district, further conflicting with the historic preservation goal of providing public access and educational opportunities to publicly owned historic resources.

It has been widely documented through surveys that visitors do not come to the National Seashore to witness a land use (ranching) which by most estimates occupies almost 40,000,000 acres of land throughout the state of California. This leads me to fundamentally call to question the assumptions within the DEIS in which Alternates A-E present various strategies of managing public lands that first benefit livestock permittees with other users and public values secondary. Point Reyes National Seashore is supposed to be managed under the Point Reyes Act for "maximum protection, restoration, and preservation of the natural environment." There's no mandate for prioritizing commercial agricultural leases on these public lands. Natural values, native wildlife, public access and enjoyment should take priority over commercial activities at Point Reyes. If Alternates A-E are to be considered, this DEIS will require significant revisions, additional back up information and further documentation to reprioritize the stewardship responsibilities of the NPS which include the re-wilding of the public lands under its control, and the rehabilitation of species and ecosystems damaged by human activities.

Lastly, I am deeply opposed to any and all of the alternatives that contemplate reduction, lethal management, or removal of any existing or new Tule Elk herds within the area under consideration. Tule elk are an important part of the landscape at Point Reyes. Their recovery is a result of successful native ecosystem restoration, which is a key element of the Park Service's mission. It's taken a lot of time, money and effort to restore tule elk to Point Reyes, the only national park where they live. With the current Tule Elk population at roughly 1% of its pre-colonial levels, opportunities for Californians to observe Tule Elk are extremely limited. Given the above, it seems unconscionable that Tule Elk populations should be either numerically reduced, or made more difficult to observe for the benefit of a commercial land use.

I appreciate the opportunity to review and comment on the DEIS. If you have any questions on my comments please feel free to contact me at 202.999.2250.

Sincerely, Alexandra Phelan

#7504

Name: Vonog, Stan

Correspondence: Comment 1.

Three National Park Service laws prohibit actions that will impair natural resources (the 1916 NPS Organic Act, Point Reyes National Seashore legislation Section 459c-6, and Golden Gate National Recreation Area legislation Section 460bb).

According to the Draft Environmental Impact Statement (DEIS) the Alternatives A,B,C,D,E (ranching alternatives) involve the impairment of natural resources within the planning area.

Consequently, the Park Service should prepare and circulate for public comment a supplemental DEIS with ranching alternatives that comply with applicable laws requiring the protection of natural resources.

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Comment 2.

The Draft Environmental Impact Statement (DEIS) fails to incorporate an analysis of the impact of lethal Tule Elk removal on Visitor Use and Experience and fails to anticipate or document the vigorous public opposition to lethal elk removal.

The DEIS on page 168 Alternative B - Public Use and Enjoyment - Elk Management plainly states that Over time, the experience of visitors who oppose elk control would be indirectly adversely affected [&]. However, no further analysis is presented, nor further data gathering is contemplated.

Following the release of the current DEIS the proposed lethal removal of Tule Elk has been subject of vigorous public opposition and critical TV nationwide coverage on NBC, CBS, Fox, in the regional press and internationally (Toronto Star, Canada).

Over 9,000 online petitions have been gathered in opposition to killing of Tule Elk as of 9/23/19 at change.org web site at <https://www.change.org/p/cicely-muldoon-save-the-tule-elk> and multiple public demonstrations were held around the BayArea (e.g. <https://www.facebook.com/events/555075298655008/>)

The DEIS failed to quantify and study the effect on the visitor experience of the proposed killing of Tule Elk. The Park Service should commission a public opinion survey around the issue of killing of Tule Elk and its impact on visitor use and experience, and incorporate the findings in a new supplemental DEIS.

The design and administration of public opinion surveys relating to the proposed killing of the Tule Elk may help quantify the degree to which the potential adverse impacts listed below are a risk, as well as their potential costs.

Potential adverse effects of elk management by lethal removal include:

- 1) reduction of enjoyment of the park because of reduced visits due to continued negative publicity;
- 2) reduction of enjoyment of the park by a portion of the public that does not support killing of Tule Elk and is emotionally affected by the proposed killing program;
- 3) reduction of enjoyment of the park by young children should they learn that the elk are being killed by the Park Service;
- 4) reduction of public support of the Park programs due to the killing of the Elk;
- 5) reduction of rancher revenue and reduced financial viability of ranching in the area due to consumer boycotts because of rancher support of elk management by lethal removal;
- 6) increased costs associated with potential public protests in the Park related to elk management by lethal removal;
- 7) increased costs to the Park Service due to continued and expanded litigation;
- 8) other adverse impacts to the Park and the public.

In light of the vigorous public opposition and negative publicity resulting from the proposed "lethal removal" of the Tule Elk from portions of the planning area, the Park Service should consider abandoning this management tool in favor of alternative approaches and revising the proposed Alternatives accordingly.

-- Appendix to Comment 2 --

Select national, regional and international TV and press coverage resulting in public opposition to the proposed killing of the Tule Elk.

KTVU Fox 2. National Park Service proposes killing elk for cattle in California park over loud objections. Aug 9, 2019. <http://www.ktvu.com/news/national-park-service-proposes-killing-elk-for-cattle-in-california-park-over-loud-objections>

Fox 10 Phoenix. National Park Service proposes killing elk for cattle in California park over loud objections. Aug 9, 2019. <https://www.fox10phoenix.com/news/national-park-service-proposes-killing-elk-for-cattle-in-california-park-over-loud-objections>

Fox 5 Washington, DC. National Park Service proposes killing elk for cattle in California park over loud objections. Aug 9, 2019. <https://www.fox5dc.com/news/national-park-service-proposes-killing-elk-for-cattle-in-california-park-over-loud-objections>

NBC Los Angeles. Officials Propose Killing Elk for Cattle. Aug 8, 2019. <https://www.nbclosangeles.com/news/local/Officials-Propose-Killing-Elk-for-Cattle-in-California-Park-528868121.html>

NBC Bay Area. Officials Propose Killing Elk for Cattle in California Park. Aug 8, 2019. <https://www.nbcbayarea.com/news/local/Officials-Propose-Killing-Elk-for-Cattle-in-California-Park-529236211.html>

Toronto Star, Canada. Officials Propose Killing Elk for Cattle in California Park. Aug 8, 2019. <https://www.thestar.com/news/world/us/2019/08/08/officials-propose-killing-elk-for-cattle-in-california-park.html>

NBC Bay Area. Future of Point Reyes National Seashore Up For Discussion. Aug 28, 2019. <https://www.nbcbayarea.com/news/local/Future-of-Point-Reyes-National-Seashore-Up-For-Discussion-558646791.html>

CBS SF Bay Area. Point Reyes Ranching, Elk Culling Proposals To Be Heard At Public Hearings. Aug 9, 2019. <https://sanfrancisco.cbslocal.com/2019/08/09/point-reyes-ranching-elk-culling-proposals/>

Napa Valley Register. Officials propose killing elk for cattle at Point Reyes National Seashore. Aug 8, 2019. [https://napavalleyregister.com/news/local/officials-propose-killing-elk-for-cattle-at-point-reyes-national/article\\_c21140c5-7a5e-58cb-8118-b11fa18d28f3.html](https://napavalleyregister.com/news/local/officials-propose-killing-elk-for-cattle-at-point-reyes-national/article_c21140c5-7a5e-58cb-8118-b11fa18d28f3.html)

Sacramento Bee. Feds plan to kill elk at Point Reyes to protect ranches. Aug 8, 2019. <https://www.sacbee.com/news/local/environment/article233662527.html>

Associated Press. Tule elk would be shot if plan advances favoring Point Reyes cattle. Aug 8, 2019 <https://apnews.com/c48ac87a078242f3a4bc30aea34359ed>

San Jose Mercury News. National Park Service releases controversial plan for Point Reyes elk, ranches. Aug 9, 2019. <https://www.mercurynews.com/2019/08/09/point-reyes-national-seashore-proposes-20-year-ranch-leases-culling-tule-elk/>

Sonoma State Star. New Point Reyes Management Plan Suggests Killing Native Elk on Behalf of Cattle Ranching. September 3, 2019. <https://www.sonomastatestar.com/news/2019/9/3/new-point-reyes-management-plan-suggests-killing-native-elk-on-behalf-of-cattle-ranching>

Marin Independent Journal. Opinion: Time for ranchers to leave our national seashore. June 10, 2019. <https://www.marinij.com/2019/06/10/marin-voice-time-for-ranchers-to-leave-our-national-seashore>

The Draft Environmental Impact Statement (DEIS) fails to provide sufficient analysis to justify the preference of elk management by lethal removal over the option to translocate elk individuals outside the park in collaboration with the State of California as part of Alternatives B,C,D.

As a result, the DEIS recommendations as currently presented fail to attempt to minimize the adverse impact on the valuable Tule Elk resource.

On page 41, the DEIS states that "For translocation outside the park to be practicable, NPS would need to document that the elk are free of Johnes disease and CWD. The State of California would need to approve the move and have capacity to accept additional elk in state-managed herds. If translocation becomes a practicable option in the future, additional compliance would be completed at that time to address potential impacts on elk and other resources."

While acknowledging the potential availability of the translocation option, the DEIS fails to analyze and explore the viability of translocation and simply designates lethal removal as the preferred elk management option for Alternatives B,C,D without providing reasonable basis for such preference.

The Park Service should obtain definitive statements from the State of California on whether transportation of specific elk individuals would or would not be permitted and under what conditions. The Park Service should initiate a collaborative process with the State of California to establish the mutually acceptable procedures (e.g. for disease testing, reimbursing of costs, etc) for such transportation to prevent the killing of Tule Elk individuals as currently proposed in Alternatives B,C,D.

The Park Service should issue a supplemental DEIS and revise the Alternatives B,C,D to remove elk management by killing the Tule Elk individuals, unless the Park Service receives a written statement from the State of California indicating an unconditional refusal to establish procedures to accept select Tule Elk individuals to locations outside of the planning area.

Alternatively, the revised DEIS could definitively state that translocation is preferable to killing, and that the killing of the Tule Elk individuals would not be effected if the Park Service is able to negotiate appropriate translocation procedures with the State of California.

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Comment 4.

The Air Quality analysis included in the Draft Environmental Impact Statement (DEIS) on pages 96 and 97 presents an aggregate picture of NH3 and VOC compared to total Marin County Farming Operations as well as total Marin County Emissions.

While consistent with average emission levels for industrial ranching (~20% of Marin County Farming Emission consistent with ~20% of the area's contribution to the County's farming industry's gross product) concentration levels of NH3, VOC, Ozone, PM2.5 in specific locations are not presented.

I visit Point Reyes National Seashore regularly (approximately once a month). While driving near farming operations, for instance on Pierce Point road, the smell at certain locations is extremely strong and persists, subjectively, for 5-10 minutes of driving at about 30 miles per hour.

The subjectively high levels of VOCs and other pollutants in specific areas near concentrated farming operations are not captured by the Park Service, not presented to the public, nor provided in the DEIS. The extremely strong smell is not consistent with the enjoyment of the park and is reminiscent with large scale industrial cattle



operations, not low impact historic agriculture. In addition, the extreme smell may be indicative of other extremely adverse impacts on environment.

The DEIS should be revised to include VOC, NH3, Ozone and PM2.5 measurements at specific locations near concentrated farming operations and exposure to visitors (drivers, bicyclists or hikers). The DEIS could consider a roadmap to add continuous programmatic monitoring of air quality in multiple specific in the future. Many low cost air quality monitoring sensors and systems for continuous monitoring are now available with newly developed technology (e.g. <https://purpleair.com>).

At a minimum, the DEIS should include the results of air quality audits at multiple specific locations, especially near areas of visitor transit or concentration, and provide those measurements to the public in addition to the aggregate levels.

The current concentrated emission levels at locations close to ranch operations (e.g. Pierce Point road near cattle structures) likely exceed applicable limits, interfere with park enjoyment, and negatively affect visitor use and experience.

The Park Service should revise the DEIS to include air quality measurements at farm sites in addition to aggregate area levels.

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Comment 5.

The Draft Environmental Impact Statement (DEIS) fails to provide the basis for the proposed succession framework which is outlined, for instance, on page 37 for Alternative B as "Succession. In the event an existing rancher decides to discontinue ranching, NPS would implement succession planning that is consistent with maintaining multi-generational ranching in the planning area." The DEIS fails to substantiate why succession planning consistent with multi-generational ranching is a preferred framework.

The paragraph below represents one reference point as to why mandating multi-generational succession policy may not be in the public interest, at least for the present circumstances in the Point Reyes National Seashore.

While the current group of ranchers present themselves as great stewards of the land (e.g. Point Reyes Seashore Ranchers Association Public Comments Re: Ranch Comprehensive Management Plan Dated 6/2/14) , in fact they have been opposed to the objectives of the park not related to narrow interests related to industrial ranching. The current ranchers' opposition to public interest in preserving the natural resources of Point Reyes goes back to the original opposition of the prior generation to the legislation that established the Point Reyes National Seashore, to present-day advocacy for lethal elk removal including the complete removal of the Drakes Bay herd, to advocating against public access to public land, to not maintaining the visual quality of cattle structures and operations consistent with historic preservation objectives, to insisting on continuing industrial-scale cattle operations with significant adverse environmental impacts to the natural resources of the National Park, to organized lobbying of elected officials to advance legislation and policy in their narrow self-interest.

The DEIS fails to present alternative frameworks for lease succession, does not analyze the pros and cons of alternative lease award and renewal frameworks, as well as does not establish clear criteria or process for granting and renewal of leases in the planning area.

The current lease renewal process is opaque and appears to be biased in favor of current lease holders without basis. In other area of federal government engagement with the private sector, such as the federal contracting process, the awardees are subject to a competitive process based on criteria outlined in an RFP. If the award is non-competitive, justification is typically provided.

DEIS should be revised to include criteria and process for lease award and renewal, an analysis as to whether current leaseholders would satisfy the objectives of the Park, of the relevant legislation and the public interest, as well as propose a competitive solicitation process for lease award and renewal open to all interested parties.

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Comment 6.

The Draft Environmental Impact Statement (DEIS) fails to propose alternative models for permitted ranch operations that would preserve the historic agricultural aspects of the area without the detrimental impacts associated with modern industrial-scale cattle farming and ranching as practised by the current lessees.

To the extent that preserving the historic ranching character of the area is a valid or desirable objective, it is clear that industrial-scale ranching using modern technology is not an appropriate way to achieve that objective, considering its significant adverse environmental impacts as outlined in the DEIS. Because industrial-scale ranching involves significant impairment of park natural resources it is not consistent with applicable legislation, including the 1916 NPS Organic Act, Point Reyes National Seashore legislation Section 459c-6, and Golden Gate National Recreation Area legislation Section 460bb.

The DEIS should propose additional alternatives involving significantly scaling down industrial operations and transitioning to leases permitting only very small scale, low impact activities highlighting historic agriculture, perhaps with expanded opportunities for visitor interaction, and more resources devoted to historic programs.

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Comment 7.

The present visual quality of industrial ranch structures and operations, as one drives on park roads near the operating ranch structures and activities, is detrimental to the objective of preserving the historic quality of the area and maximising the enjoyment of the park resources.

The Park Service should revise the Draft Environmental Impact Statement (DEIS) to include images of ranch structures and operations, and a discussion of costs and benefits, i.e. how they add or detract from the goal of preserving the historic character of the area, as well as provide for remediation and improvement requirements as part of the lease terms.

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#7505

Name: Morgan, Megan

Correspondence: Ranching has changed considerably since it was initially allowed at Point Reyes and it needs to stop. The Tule Elk are more important than cattle and must be protected. This Plan B to add other farm animals to the area is short sighted and truly against the spirit of the National Park system.

#7506

Name: Blackie, Heather

Correspondence: Authors of DEIS Pages 196-197 list the team and the qualifications they have in drafting this DEIS. The list contains not a single farmer or rancher, nor does it contain a representative from an as yet

unformed "agricultural advisory board", the request for which had been included in the public scoping comments. With the fate of ranching on the seashore potentially in the balance, not to include a rancher or someone deeply familiar with an agrarian way of life is like asking a park ranger to grow food and a lot of it, or like asking a rancher to create a plan for a park. Something, indeed many things are lost without that perspective.

The list of qualifications included many qualities that a rancher must have, such as an understanding of ecology, hydrology, biology, resource management, watershed management, in addition to a host of other skills such as animal husbandry, plumbing, fencing, and economics. In addition, there has been this persistent need over the years to defend the livelihood of ranching while continuing to ranch. There aren't many livelihoods, if any, that require such defense, certainly none of the positions listed are as vulnerable. It is worth mentioning as well that those who drafted the DEIS are all paid for their work, while ranchers, of course, are not.

From this imbalance comes a draft that unfortunately reflects that imbalance as there are few positives listed concerning the presence of the ranchers and the work and land to which they devote their skills, their resources, their lives.

Alternatives considered but dismissed List of Tables Nowhere in this section (p. 59 - 63) is there mention of carbon farm plans in spite of the fact that they were mentioned numerous times in public scoping comments and carry significance based on the science that has defined the practices that comprise such plans.

The list of tables, of which there are 20, carry information about emissions, based on science. But the science about carbon sequestration, which has been conducted in places around the globe but most notably right here in Marin County (Marin Carbon Project, Carbon Cycle Institute), is never mentioned. Given the climate crisis we are facing, to neglect that there are agricultural practices that have the capacity to sequester carbon, indeed to recognize that soil is the singular carbon sink we have left, is to suggest the park exists in isolation. Because the park doesn't exist in isolation, because it is reliant on the inputs of the team that compiled the DEIS, because it is reliant on visitors and markets and resources, because it is willing to consider emissions, it must recognize its place in the greater ecosystem and as part of the planet and take into consideration what we have learned in the last ten years about carbon capture. Cutting emissions will not be enough if we are to avoid climate catastrophe and the science that has led to the crafting of carbon farm plans indicates range management and agriculture as part of the solution.

History of Ranching and Cultural Significance While there is brief (p. 3, p. 171-2) mention of the historical significance of ranching on the seashore, the focus, albeit brief, is on the infrastructure, not on the diverse farms that speckled the landscape. That diversity created a resilience that lasted up until the industrial model took hold which was promoted by the farm bill and the practices of industrial agriculture. In order to keep up economically, monocultures took over, not just at Point Reyes, but all across the country.

Because Point Reyes has a history of vibrant, resilient, diverse agricultural practices – which fed the local communities as well as city dwellers in San Francisco, those practices should be part of the DEIS. While biodiversity is mentioned regarding rangeland and the ecosystem health that coincides with it, the same is true for a diverse farm.

Because it is impossible to make an economically viable row crop operation on 2.5 acres without irrigation and confined to a place because there is a line on a map and proximity to buildings (ranch core), there needs to be reconsideration of this condition. Dry farming in somewhat predictable conditions is challenging enough but with climate change, it drastically increases the unpredictability and risk, not to mention the range of crops that would be possible to farm.

Visitor Use, Experience, and Access The presence of a working landscape that could be comprised of diverse farms that supply local food and contribute to the economies of ranchers and their communities would be a wonderful learning opportunity for the public. While people have become disconnected from nature, they have

become disconnected from where their food comes from as well – agriculture as well as wild places offer complementary ways for people to connect with nature.

The fact that millions of visitors come to Point Reyes already and travel trails and see elk that are not eating in ranchers' fields illustrates that there are high population densities of humans in parts of the park. The ranches, on the other hand, are inhabited by people who call them home, who are on the land 24/7 and the population density of humans is significantly lower on these working landscapes. This is worth considering as other populations of birds, rodents, insects, plants, coincide with the presence of working ranches.

Point Reyes can have both. It does now. What's been learned about agricultural practices in the past ten years cannot be ignored. Point Reyes is a magnificent wild place. But the ranches, their history and their diversity are part of that fabric.

In need of additional modifications and considerations, Alternative B comes the closest to fitting the landscape at Point Reyes.

#7507

Name: Eagle-Gibbs, Ashley

Correspondence: Dear Superintendent Muldoon,

I was born and raised in San Anselmo in Marin County, and I have been visiting and enjoying the Point Reyes National Seashore (Seashore) since I was a child. I feel privileged to be able to share the Seashore with my own twin boys now. I have a background in law and policy.

I submit these comments in a hope that the National Park Service remains consistent with their purpose and Congressional direction to conserve natural resources for future generations. I am concerned, because the Draft Environmental Impact Statement (DEIS) appears to be inconsistent with the Seashore's purpose in that the DEIS appears to prioritize economic interests over natural resource preservation and the enjoyment by future generations.

Resource protection is the highest value for the Seashore as intended by Congress in requiring the Department of the Interior to administer its Point Reyes lands "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. Section 459c (6)(a) (emphasis added).

Regarding the Succession Policy, the policy to extend requests for proposals to new operators appears to be inconsistent with the purpose of the Seashore, the planning documents, and the historic designation of solely dairy and beef ranching in the Seashore

In addition, the DEIS fails to consider several foreseeable impacts of the proposed diversification, as is required by the National Environmental Policy Act, such as cumulative and connected impacts, as well as indirect and direct impacts. Some of the impacts which are not considered in the DEIS include the impacts of wildlife conflicts, additional traffic, and infrastructure impacts (like impacts to already degraded public roadways).

Regarding impacts to environmental resources, the DEIS also completely fails to consider climate change and sea level rise impacts to natural resources. Regarding water quality impacts, additional water quality monitoring is needed in the Seashore to have sufficient baseline data, as well as monitoring data, especially on the Pacific Ocean side. Greater buffers are needed around the sensitive Drakes Estero Marine Wilderness area. Although perhaps well intentioned, Schooner Bay should not be opened to additional boat-in public access with the Seashore's extremely limited resources.

My family and I greatly enjoy visiting the Seashore and the tule elk, and we will be saddened if the elk population is harmed in the name of economic interests. I am against culling the elk for economic reasons.

Lastly, the DEIS fails to adequately consider the economic impacts and tradeoffs associated with the additional staffing and planning needed to fully implement the General Management Plan Amendment. Unfortunately, the Seashore is already over-burdened with their limited budget, so the economic considerations of this additional planning, review and implementation must be thoroughly analyzed in order for the changes to be effective.

Thank you for all that you do and for the consideration of my comments.

Sincerely, Ashley Eagle-Gibbs, Esq.

#7508

Name: Corning, Glenda

Correspondence: I believe that the Point Reyes Seashore should be restored as a wild habitat and that ranching should be phased out or extremely limited. We are going through a huge extinction of birds, insects and other wildlife on this planet. We need to protect and cultivate our wild spaces for greater biodiversity. Managing the Point Reyes Seashore with Tule elk grazing and fire could revitalize the grasslands and create a wonderful opportunity for native plants and animals to thrive and for people to interact with wild nature in areas that are currently off-limits when the land is used for dairy ranching. The conflicts between the needs of elk, predators and ranch cows will escalate. Degradation of the waterways will continue as manure is leached into them. Many of these ranches are overgrazed and poorly maintained. I prize local agriculture but there has to be a balance with wild nature. Please protect the Point Reyes Seashore and bring it back to its wild state.

#7509

Name: Pinto, Erin

Correspondence: It is tremendously disturbing that NPS wants to protect livestock ranching in a national park at the expense of actual park values of open space, wildlife protection, and visitor experience. DO NOT go back on the plan to phase out ranching just because it's been there. And especially do not continue the abuse and extermination of the elk. They are the victims of political manipulation of MY national park land. Do not use my tax dollars to prop up cattle ranching! Do what's right and honor the ranching phase out plan!

#7510

Name: N/A, N/A

Correspondence: Point Reyes National Seashore is just that, a National Park to be enjoyed and protected by all!! The tule elk, which were almost once extinct, belong here, not cows, chickens, and other animals that are being allowed to be raised here for the economic gain of a few. The NPS should be concerned about the methane gas and waste that is being produced by all these cows. I really feel that the preferred alternative that part staff recommends is a sellout, I am shocked and disappointed. They are taking the road of least resistance. Let's remember when decisions are being made and remind ourselves that this is a precious area that needs to be protected and preserved, the cows need to go not the tule elk!

#7511

Name: Johnson, Huey

Correspondence: I write to comment about the conditions at Pt Reys Seashore. I have had years working on it. I was involved in buying some of the land now included in Seashore.

Two ignored factors are management and money. I criticize based on experience. I have a graduate degree in resource management, and served as California's Secretary of Natural Resources, those duties included overseeing the state Park system.

I appointed Russ Cahill as the State Director at that time.

The problem at Pt. Reyes is one of management. The two key positions, the superintendent and the Seashore biologists position are both filled with people who are locals. Mr. Press, grew up in the park and is a close friend of the heirs behind the attempt to capture and control cattle ranching.

The Superintendent, Cicely Muldoon was born and raised in Marin. and has no experience in park management. She is a close friend of the economic interests there,

This problem isn't new to public land management. I recall in my graduate school studies that local people, captured by their friends and neighbors are do not provide necessary oversight or enforce park regulations.

The 6,000 cattle are a huge industrial business. The federal subsidy paid each month per cow is a huge financial windfall to the grazers and are the real reason for the conflict which is based on greed with no park enhancement. Based on my experience I sense the Farm Bureau's presence behind the park's problem of overstocking and overriding park management values.

Basically the problem is solvable by transferring the Superintendent and Mr. Press, the biologist to another park system. Even better would be cut them loose, and replace them with professionals without local ties.

If the situation is left adrift I fear it will affect the NPS and parks elsewhere.

Huey D Johnson Former California Secretary of Resources Founder of the Trust for Public Land Former President of the Nature Conservancy Founder of the Grand Canyon Trust Founder of the Resource Renewal Institute

#7512

Name: Holmes, Ellen

Correspondence: Many important issues were not thoroughly analyzed in the DEIS, including cumulative impacts on climate change. However, I am not an expert on the matters under consideration but EAC (Environmental Action Committee) is and they have no agenda outside of doing what is best for the Park in terms of maximum protection of the Natural Resources within the Park. Therefore, the most useful comment I can make is to urge you to listen carefully to their analyses of the DEIS and to make your decision based on their concerns and advice !

#7513

Name: Kreklau, Nicole

Correspondence: Please do not grant further lease agreements to farming and ranching. The specific elk herd already has land protected to help them survive - the elk do not live elsewhere or have other places to go - it is the ecosystem naturalized for the creatures that inhabit. Ranchers (only who kill the animals that pasture on the lands at issue) are competition that cannot be tolerated. Ranchers and farmers can be flexible and are not permanent, being able to move livestock or plant crops elsewhere - in less protected and less vital lands.

I come from a family of farmers, who purchase or lease land out of their own pockets/profits, not like these opportunist ranchers and farmers using taxpayer subsidized lands to oust delicate ecosystems with magnificent creatures and flora.

Please give reason to hold heads high like the glorious bugling elk.

#7514

Name: Law, Todd

Correspondence: I don't want my public land given ranchers that is causing damage to our environment

#7515

Name: Meghrouni, Sara

Correspondence: To whom it may concern,

I oppose all options to allow cattle grazing in Point Reyes national seashore. Save the elk!

Sara Meghrouni

#7516

Name: Baker, Elizabeth

Correspondence: Like many, I have been visiting Pt. Reyes for my entire life and feel that its wild places and wildlife have helped shape who I am. From beach days as a young kid to trail work as a teenager to my wedding day hike on the Bear Valley trail, some of the greatest moments of my life have taken place within the park boundaries. I believe that its singular, spectacular qualities deserve to be managed to support the park's wild - not domesticated - life.

While I respect Pt. Reyes ranchers and dairy farmers, ranching should be phased out. Ranching operations are simply incompatible with biodiversity-focused park management, particularly as the varied impacts of climate change are projected to stress flora and fauna in coming years. The ranching way of life need not be erased; it can live on as a part of the park's socio-historical education programming, which I hope would be a meaningful part of a transition away from active ranching.

Alternative F is the only option that puts nature ahead of everything else, which is just as it should be inside a national park.

When I picture my two young children visiting Pt. Reyes in twenty, forty, or sixty years from now, it's the bugling of the elk I hope they hear. It's that fierce wind sweeping the native meadows in the pastoral zone that I hope they feel. It's the migrating birds that I hope they spy as they rest, mid-route. Cows, on the other hand, they can experience just outside the Pt Reyes boundaries.

#7517

Name: McKee, Michael

Correspondence: I want to support alternative F, favoring the phasing out of cattle ranching in Point Reyes. I am a 4th generation bay area native, and find the cattle really out of character and unpleasant. I feel the majestic Elk population should rule without competition. The cattle are also a crazy road hazard at night.

#7518

Name: Boss, Tom

Correspondence: Marin County Bicycle Coalition (MCBC) greatly appreciates the opportunity to comment on the Environmental Impact Statement (EIS) for the Point Reyes National Seashore and North District of Golden Gate National Recreation Area (PRNS/GGNRA) General Management Plan Amendment (GMP Amendment).

Founded in 1998, MCBC's mission is to promote safe bicycling for everyday transportation and recreation. Our advocacy efforts focus largely on closing gaps in Marin's networks of pathways and trails, enabling people of all ages and abilities to ride safely without exposure to traffic.

MCBC views the GMP Amendment and any subsequent trail planning it catalyzes as a key opportunity to 1) enable and encourage car-free access to PRNS/GGNRA, contributing to the Green Parks Plan's goal to reduce carbon emissions in NPS parks, 2) expand bicycling access across these beautiful public lands, 3) improve connectivity between existing routes on and adjacent to PRNS/GGNRA, and 4) create routes that enable people to travel throughout the area on trails, pathways, and ranch/administrative roads without having to ride on roads with traffic.

We support the public use and enjoyment improvements outlined under Alternatives B, C, D, E, and F. While identifying a preferred alternative is outside of our organization's scope, we oppose Alternative A (no action) on the basis that it would not significantly expand or improve public access on leased lands.

## PUBLIC USE AND ENJOYMENT: DEVELOPMENT OF TRAILS AND TRAIL-BASED RECREATION

Much of the PRNS trail system resides in designated wilderness, which prohibits bike access. Hikers and equestrians enjoy over 100 miles of trails in the Seashore that will continue to remain off-limits to people on bicycles, which is why the GMP Amendment is a critical opportunity toward expanding access in PRNS/GGNRA public lands and providing safe alternatives to riding on roads with traffic.

We were pleased to see NPS call out improved "hiking, biking, and equestrian access" and trail opportunities that "would focus on loop routes, connectivity with adjacent public lands, and facilitation of north-south connectivity across the landscape" as elements common to Alternatives B, C, D, E, and F. We believe our trail priorities (outlined below) share these characteristics.

### Priorities

We strongly support proposals that would lead to the planning and implementation of bicycling routes on trails, ranch roads, and pathways throughout the planning area, including but not limited to:

- A connection between Devil's Gulch and Platform Bridge Road using existing ranch roads.
- A connection between Bolinas Ridge Trail at Olema Hill and Point Reyes Station to serve as an interim connection for the Cross Marin Trail.
- A connection between Bolinas Ridge Trail and Five Brooks Stables using existing ranch roads.
- A connection between Drakes Estero and Abbotts Lagoon Trail using existing ranch roads.
- A connection between Marshall Beach Trailhead and Pierce Point Road using existing ranch roads.
- An Estero Trail loop using existing ranch roads.

MCBC also recommends the inclusion of a pilot project to illustrate compatibility between public access and ranching operations, should they continue. A terrific candidate would be the creation of an Estero Trail loop at Drakes Estero, where there are an abundance of roads and social trails that could be used to bridge the gap between White Gate Trail and Estero Trail along the east side of Home Bay, as well as existing fences that would separate livestock and visitors.

## VISITOR CARRYING CAPACITY

We support the inclusion of several strategies to improve the visitor experience, including through wayfinding, permitting and managing trail-based event requests, and education aimed at promoting safe and responsible trail use.

## CONCLUSION



We are confident that any concerns that may arise around trail construction, trail safety, or compatibility between public access and ranching operations can be mitigated. MCBC stands ready to assist through our well-established trail stewardship and education programs.

We greatly appreciate the public access improvements outlined in Alternatives B-F and look forward to participating in subsequent planning processes to identify and implement new trail connections. We hope that NPS' chosen outcome will expand access throughout the planning area, enable more people to visit the park without driving, and dramatically improve visitor safety and enjoyment.

#7519

Name: Vargas, David

Correspondence: I support the ranchers. They manage the land and keep it grazable for both species. They are a rich part of the region's cultural history and provide delicious milk and cheese

#7520

Name: Cutrano, Chance

Correspondence: Draft Foundation Document c/o Superintendent Point Reyes National Seashore 1 Bear Valley Road Point Reyes Station, CA 94956

Re: Comments on the Draft EIS/GMPA for Point Reyes National Seashore

Thank you for the opportunity to provide comment on the Draft Environmental Impact Statement (DEIS) and the General Management Plan Amendment (GMPA) for the Point Reyes National Seashore (PRNS) and the north district of Golden Gate National Recreation Area (GGNRA), a planning area of more than 28,000 acres of National Park Service (NPS) lands collectively referred to as the park. I have mailed a hard copy of this letter to the Park Service at Bear Valley, and wish for that to be included as the comment given that I have color-coded text that is central to my examination of the DEIS/GMPA, but wanted to be sure the comment is counted and so I am also submitting electronically.

The Resource Renewal Institute (RRI) is an environmental nonprofit organization located in Mill Valley, California. The organization's mission is to foster innovative solutions for increasingly complex environmental problems, and to test new ideas. This innovation focuses on sustainable practices and solutions to natural resource management. RRI has programs focusing on advocacy, education, organizational development, sustainability analysis, and applied research. RRI has successfully incubated and nurtured new programs and strategies to improve our environment and well-being, and leaders who have become catalysts for change.

Environmental leadership and inventive land and water management practices are at the heart of RRI's work. For example, Fish in the Fields is an integrated agricultural land use system with massive implications for carbon sequestration, protein sourcing, and ocean conservation. Defense of Place and Public Trust Alliance are organizations that uphold the inviolability of protected lands through policy analysis and collaboration with citizen activists nationwide

Huey Johnson, the founder of RRI, has been involved in issues in Point Reyes since he moved to Marin decades ago. In the 1970s, Huey founded the Trust for Public Land and, through that organization, acquired various parcels from the RCA Corporation in the 1970s. For example, in 1976 and 1977, the Trust for Public Land announced the purchase of 2,300 acres (G Ranch and what is now Niman Ranch/Commonweal area) of coastal Marin property for eventual inclusion into the Golden Gate National Recreation Area and Point Reyes National Seashore.

To prepare our comments, RRI has read and reviewed the draft Foundation Statement, DEIS/GMPA, the 2019 Natural Resources Condition Assessment, the 2018 Grazing Plan, the Freshwater Quality Monitoring in the San

Francisco Bay Area Network Biennial Report on Water Years 2015 and 2016, the 2013 Coastal Watershed Assessment, the 2006 NPS Management Policies, the 2004 NMFS Biological Opinion, the 2002 USFWS Biological Opinion, the 1998 Elk Plan, the 1990 Range Management Guidelines, the Foundation Statements and Cultural Resource Inventories/Plans for various other National Parks with similar cultural resources (e.g., Grand Teton National Park, Channel Islands National Park), and numerous other documents and data applicable to the DEIS/GMPA and the current planning area, many of which we obtained from the NPS under a Freedom of Information Act Request.

### Impacts of Each Alternative: An Overview

For the record, RRI wants to acknowledge the following environmental impacts identified by the National Park Service (NPS) under each of the proposed alternatives (with positive impacts highlighted in blue and negative impacts highlighted in red-neutral or questionable impacts will be left un-highlighted and addressed in the following section):

#### Alternative A

Activities associated with beef and dairy ranching will continue to affect soils because of erosion, compaction, and alteration of soil fertility. Activities associated with beef and dairy cattle ranching would continue to affect watersheds in the planning area. Activities associated with ranching would have adverse impacts on some plant species and beneficial impacts on others. Impacts from disturbance associated with ranching activities and altered habitat conditions would be adverse while impacts related to the maintaining key habitats such as grasslands and stock ponds would continue to be beneficial. Fencing and hazing will remain adverse impacts for the free-ranging Drakes Beach Tule elk herd. Activities will continue to contribute beneficial impacts to the Point Reyes Dairy Ranching Historic District and Olema Dairy Ranches Historic District cultural landscapes through ongoing grazing and to the ranch structures that remain occupied. Impacts on historic buildings may be adverse depending on the level of funding available for deferred maintenance. 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. Dairy operations are the primary contributors for ammonia (NH<sub>3</sub>), volatile organic compounds (VOC), and carbon dioxide-equivalent (CO<sub>2</sub>e) emissions in the park, while beef cattle are the primary contributors to fugitive dust and particulate matter (PM<sub>2.5</sub>) emission rates. Mobile source emissions would be similar to existing conditions because a change in visitor use levels is not anticipated.

#### Alternative B

Activities associated with beef and dairy ranching will continue to affect soils because of erosion, compaction, and alteration of soil fertility. Activities associated with beef and dairy cattle ranching would continue to affect watersheds in the planning area. Activities associated with ranching would have adverse impacts on some plant species and beneficial impacts on others. A zoning framework is said to limit impacts on wildlife from authorized activities such as ranch diversification and remove grazing from sensitive resources such as riparian areas, surface waters, and federally listed species habitat. Impacts on wildlife would also continue to be avoided, minimized, or mitigated through the implementation of mitigation measures. Impacts on wildlife would remain beneficial or adverse, depending on the species. Size of the Drakes Beach elk herd would be limited to 120 individuals through lethal removal. Fencing and hazing will remain adverse impacts for the free-ranging Drakes Beach tule elk herd. Adverse impacts on visitor use and experience could occur as a result of killing of elk would be temporary and localized. Activities will continue to contribute beneficial impacts to the Point Reyes Dairy Ranching Historic District and Olema Dairy Ranches Historic District cultural landscapes through ongoing grazing and to the ranch structures that remain occupied. 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. Dairy operations are the primary contributors for ammonia (NH<sub>3</sub>), volatile organic compounds (VOC), and carbon dioxide-equivalent (CO<sub>2</sub>e) emissions in the park, while beef cattle are the primary contributors to fugitive dust and particulate matter (PM<sub>2.5</sub>) emission rates. Mobile source emissions would be similar to existing conditions because a change in visitor use levels is not anticipated.

## Alternative C

Activities associated with beef and dairy ranching will continue to affect soils because of erosion, compaction, and alteration of soil fertility. Activities associated with beef and dairy cattle ranching would continue to affect watersheds in the planning area. Activities associated with ranching would have adverse impacts on some plant species and beneficial impacts on others. A zoning framework is said to limit impacts on wildlife from authorized activities such as ranch diversification and remove grazing from sensitive resources such as riparian areas, surface waters, and federally listed species habitat. Impacts on wildlife would also continue to be avoided, minimized, or mitigated through the implementation of mitigation measures. Impacts on wildlife would remain beneficial or adverse, depending on the species. The NPS would lethally remove the Drakes Beach herd, totaling approximately 124 individual elk-eliminating one of two free-range tule elk herds in the national park system. Impacts on the Drakes Beach herd would be significant because it would no longer exist. Overall viability of the tule elk population in Point Reyes would not be affected. Adverse impacts on visitor use and experience could occur as a result of the removal of the Drakes Beach herd. Activities will continue to contribute beneficial impacts to the Point Reyes Dairy Ranching Historic District and Olema Dairy Ranches Historic District cultural landscapes through ongoing grazing and to the ranch structures that remain occupied. 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. Dairy operations are the primary contributors for ammonia (NH<sub>3</sub>), volatile organic compounds (VOC), and carbon dioxide- equivalent (CO<sub>2</sub>e) emissions in the park, while beef cattle are the primary contributors to fugitive dust and particulate matter (PM<sub>2.5</sub>) emission rates. Mobile source emissions would be similar to existing conditions because a change in visitor use levels is not anticipated

## Alternative D

Activities associated with beef and dairy ranching will continue to affect soils because of erosion, compaction, and alteration of soil fertility. Activities associated with beef and dairy cattle ranching would continue to affect watersheds in the planning area. Alternative D would have beneficial impacts on water quantity from the reduction of authorized livestock numbers. Activities associated with ranching would have adverse impacts on some plant species and beneficial impacts on others. Vegetation composition would likely change in areas where ranching is removed. While cessation of grazing would eliminate adverse impacts such as high-intensity-use areas, it may also result in an increase in invasive annual and perennial species such as thistles and grasses; a likely decrease in native forb species abundance and richness; scrub encroachment into areas currently characterized as coastal prairie; and an increase in vegetative fuels. Eliminating livestock grazing could also adversely affect several federally listed plants that occur in coastal grassland. A zoning framework is said to limit impacts on wildlife from authorized activities such as ranch diversification and remove grazing from sensitive resources such as riparian areas, surface waters, and federally listed species habitat. Impacts on wildlife would also continue to be avoided, minimized, or mitigated through the implementation of mitigation measures. Impacts on wildlife would remain beneficial or adverse, depending on the species. Impacts on federally listed plants that occur in certain habitat, such as dune or serpentine habitat, may be beneficial because the potential for cattle to trample individual plants would be reduced. Impacts on wildlife related to dairy and beef ranching would cease, including disturbance trampling erosion, and nutrient inputs. Ecological succession would occur as grassland habitats transition into scrublands or forested habitats, which would increase habitat for some wildlife but decrease it for others. Fencing and hazing will remain adverse impacts for the free-ranging Drakes Beach Tule elk herd. Cessation of ranching on 7,500 acres would have beneficial impacts on elk by removing existing fencing, reducing hazing, and impacts from hazing. Adverse impacts on visitor use and experience could occur as a result of killing of elk would be temporary and localized. Reduced ranching would have some beneficial impacts related to experience natural sights and sounds. Activities will continue to contribute beneficial impacts to the Point Reyes Dairy Ranching Historic District and Olema Dairy Ranches Historic District cultural landscapes through ongoing grazing and to the ranch structures that remain occupied. 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. Dairy operations are the primary contributors for ammonia (NH<sub>3</sub>), volatile organic compounds (VOC), and carbon dioxide- equivalent (CO<sub>2</sub>e) emissions in the park, while beef cattle are the primary

contributors to fugitive dust and particulate matter (PM<sub>2.5</sub>) emission rates. The reduction in the number of beef cattle would see a large reduction in PM<sub>2.5</sub> emission rates relative to existing conditions. Mobile source emissions would be similar to existing conditions because a change in visitor use levels is not anticipated.

#### Alternative E

Noticeable beneficial impacts to soils would occur compared to existing conditions from the conversion of the six dairy ranches to beef operations, elimination of manure management practices, seeding, forage production, and diversification activities. The removal of dairy operations under alternative E would eliminate adverse impacts on surface water quality associated with livestock congregation and concentrated manure storage near milking barns and would eliminate potential impacts from spreading manure in the Pasture subzone. Alternative E would have beneficial impacts on water quantity from the reduction of authorized livestock numbers. Activities associated with ranching would have adverse impacts on some plant species and beneficial impacts on others. Impacts on wildlife from forage production, manure spreading, diversification, and high-intensity-use areas would be eliminated. Fencing and hazing will remain adverse impacts for the free-ranging Drakes Beach Tule elk herd. Adverse impacts on visitor use and experience could occur as a result of killing of elk would be temporary and localized. The closure of dairy operations would have some beneficial impacts related to experiencing natural sights and sounds. Discontinuing dairy operations would result in an adverse impact by removing the opportunity for visitors to observe and experience active dairy ranching in a historic district. Activities will continue to contribute beneficial impacts to the Point Reyes Dairy Ranching Historic District and Olema Dairy Ranches Historic District cultural landscapes through ongoing grazing and to the ranch structures that remain occupied. It is anticipated that some dairy infrastructure may become vacant on the six dairies, resulting in potentially adverse impacts on historic structures. 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 elimination of dairy cattle would result in a reduction of NH<sub>3</sub>, VOCs, and CO<sub>2e</sub> emissions relative to existing conditions. Mobile source emissions would be similar to existing conditions because a change in visitor use levels is not anticipated.

#### Alternative F

Cessation of ranching would eliminate all impacts on soils associated with ranching activities. Alternative F would have beneficial impacts on water quantity from the elimination of authorized livestock numbers. Impacts on water quality would be noticeable, long term, and beneficial because ranching activities would be phased out across the entire planning area. Vegetation composition would likely change in areas where ranching is removed. While cessation of grazing would eliminate adverse impacts such as high-intensity-use areas, it may also result in an increase in invasive annual and perennial species such as thistles and grasses; a likely decrease in native forb species abundance and richness; scrub encroachment into areas currently characterized as coastal prairie; and an increase in vegetative fuels. Eliminating livestock grazing could also adversely affect several federally listed plants that occur in coastal grassland. Impacts on federally listed plants that occur in certain habitat, such as dune or serpentine habitat, may be beneficial because the potential for cattle to trample individual plants would be eliminated. Impacts on wildlife related to dairy and beef ranching would cease, including disturbance trampling erosion, and nutrient inputs. Ecological succession would occur as grassland habitats transition into scrublands or forested habitats, which would increase habitat for some wildlife but decrease it for others. Impacts on wildlife from forage production, manure spreading, diversification, and high-intensity-use areas would be eliminated. Impacts on elk related to hazing and fencing would be eliminated. Removing ranching operations would eliminate a unique experience for visitors to experience the role of coastal prairie ranching in California and in the historic districts, resulting in an adverse effect for visitors seeking those opportunities. 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 reuse of ranch complexes no longer used for active ranching, resulting in beneficial impacts for visitors seeking these experiences. The potential expansion of the elk population would result in long-term, beneficial impacts for visitor use and experience related to observing elk in their native habitat. Low priority structures may deteriorate or be demolished if in poor condition, potentially resulting in long-term, adverse impacts on those properties and the National Register districts to which they

contribute. Loss of pastures that are considered contributing sites could cause them to lose the integrity necessary to retain eligibility for listing in the National Register. The phase out of ranching would end ranching-related emissions of criteria pollutants: NH<sub>3</sub>, VOCs, CO<sub>2</sub>e, fugitive dust and PM<sub>2.5</sub>. Mobile source emissions would be similar to existing conditions because a change in visitor use levels is not anticipated.

#### Applicable Natural Resource Protection Laws and Policies

Based on the findings above, RRI finds the alternatives proposed by the NPS for the management of the park to be woefully inadequate and out of compliance with current laws and regulations that aim to prevent impairment of park resources and their values. Furthermore, RRI finds that, in the majority of the alternatives-especially the Preferred Alternative-the NPS fails to ensure that conservation will be predominant when there is a conflict between protection of resources and their use.

As displayed by the color-coded environmental and cultural impacts displayed above, the proposed alternatives remain in conflict with the most important statutory directive for the National Park Service: The NPS Organic Act.

The key management-related provision of the Organic Act is as follows:

[The National Park Service] shall promote and regulate the use of the Federal areas known as national parks, monuments, and reservations hereinafter specified... by such means and measures as conform to the fundamental purpose of the said parks, monuments, and reservations, which purpose is to conserve the scenery and the natural and historic objects and the wild life 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 (16 USC 1, emphasis added).

Per the National Park Service Management Policies (2006): The fundamental purpose of the national park system, established by the Organic Act and reaffirmed by the General Authorities Act (1970), as amended (1978), begins with a mandate to conserve park resources and values. This mandate is independent of the separate prohibition on impairment and applies all the time with respect to all park resources and values, even when there is no risk that any park resources or values may be impaired. NPS managers must always seek ways to avoid, or to minimize to the greatest extent practicable, adverse impacts on park resources and values.

While RRI acknowledges the laws give the NPS management discretion to allow impacts to park resource and values when necessary and appropriate to fulfill the purposes of a park, RRI believes the cumulative direct and indirect impacts of lessees in the planning area for proposed Alternatives A, B, C, D, and E constitute an impairment because the NPS must leave park resources and values unimpaired unless a particular law directly and specifically provides otherwise (e.g., in relevant legislation or by the proclamation establishing the park) The enabling legislation, The Point Reyes Act (1962) and the GGNRA enabling legislation (1972, 1988), provides neither explicitly:

The Point Reyes Act provides, in pertinent part:

§ 459c-6. Administration of property (a) Protection, restoration, and preservation of natural environment: Except as otherwise provided in sections 459c to 459c- 7...the property...shall be administered by the Secretary without impairment of its natural values, in a manner which provides for such recreational, educational, historic preservation, interpretation, and scientific research opportunities as are consistent with...the maximum protection, restoration, and preservation of the natural environment within the area (16 U.S.C. § 459c-6, emphasis added)

The GGNRA enabling legislation (1972, 1988) provides, in pertinent part: §460bb - Establishment: In the management of the recreation area, the Secretary...shall utilize the resources in a manner which will provide for recreation and educational opportunities consistent with sound principles of land use planning and management. In carrying out the provisions of this subchapter, the Secretary shall preserve the recreation area, as far as possible,

in its natural setting, and protect it from development and uses which would destroy the scenic beauty and natural character of the area (16 U.S.C. § 460bb, emphasis added).

The National Environmental Policy Act (NEPA) requires not only the analysis of an agency's alternatives, including the proposed action, are the heart of the environmental impact statement (40 CFR § 1502.14). NEPA regulations require an agency to rigorously explore and objectively evaluate all reasonable alternatives (40 CFR § 1502.14(a)), to devote substantial treatment to each alternative (40 CFR § 1502.14(b)), to identify the preferred alternative where one or more exists (40 CFR § 1502.14(e)), and to present the environmental impacts of the proposed action and the alternatives in comparative form to sharply define the issues and provide a clear basis for a choice among alternatives by the decision maker and the public. Other requirements include:

" Providing a no action alternative (40 CFR § 1502.14(d)); " Explaining why any alternatives were eliminated from detailed analysis (40 CFR § 1502.14(a)); " Identifying the environmentally preferred alternative (40 CFR § 1502.14(e), emphasis added).

RRI believes the NPS has not identified the environmentally preferred alternative, which it should have done.

### Questionable Impacts and DEIS Deficiencies

#### Vegetation, including Federally listed Species

The DEIS/GMPA states that under Alternatives D and F, ecological succession would occur as grassland habitats transition into scrublands or forested habitats, and-where ranching is removed-scrub encroachment into areas currently characterized as coastal prairie and an increase in vegetative fuels may occur. Yet, this supposed transition is dependent on a variety of ecological characteristics (e.g., elevation, soil types, hydrological cycling, etc.). Furthermore, as the DEIS points out, much of the most of the native species in coastal scrub and coastal prairie now compete with a large number of non-native annual grasses and forbs that were not historically present (DEIS 61). Human settlement and more than 150 years of grazing greatly increased the spread of Eurasian grasses and forbs, altering natural disturbance regimes of coastal prairies and affecting habitat structure and quality, species genetics, pollination dynamics, soil structure and microbes, as well as watershed hydrology, stream flow and erosion and sediment dynamics (DEIS 61). RRI takes note that none of the DEIS/GMPA alternatives include opportunities for significant restoration of natural resources and natural ecosystems, despite the NPS's mandate and obligation under its management policies (NPS 2006) to not only prevent impairment of park resources and values, but to actually improve natural, cultural, and physical resources and opportunities for enjoyment of the parks for the benefit of future generations.

Based on data collected between 1974 and 1993, vegetation changes on the Tomales Point elk range have shown relatively consistent levels of thick scrub while grassland- -particularly lupine grassland, and baccharis grassland populations-expanded dramatically (Bartolome, 1993). RRI points to that study as indicative of possible restoration projects that can take place throughout the seashore with great success for native flora and fauna, while supporting public recreation, use and enjoyment of natural and cultural resources at Pierce Point Ranch

#### Wildlife, including Federally listed Species

##### Tule Elk

For Alternatives A, B, C, D, and E, the NPS states that the future existence and overall viability of the tule elk population in Point Reyes would not be affected by management decisions. However, RRI believes the threat of Johnes disease from continued animal agriculture as well as genetic diversity were not adequately addressed in the DEIS/GMPA. Loss of landscape connectivity and habitat fragmentation are major threats to the biodiversity of plant and animal life in California (Spencer et al. 2010, Theobald, et al. 2011, Lacher and Wilkerson 2013). For this reason, California's State Wildlife Action Plan (California Department of Fish and Wildlife 2015) contains a

specific goal to maintain and improve wildlife corridors and genetic diversity (Goal 2.1, Connectivity). Mammals such as elk require large interconnected regions to maintain the genetic diversity of healthy populations (Kucera 1991, Lyon and Christensen 2002, Williams et al. 2004, Cronin et al. 2008).

Each of aforementioned alternatives are counter to California Department of Fish and Wildlifes (CDFW) 2018 Elk Conservation and Management Plan. In their 2018 Elk Conservation and Management Plan, CDFW note that elk populations are recovering but will never reach historic levels due to permanent loss of habitat and, given threats such as climate change and ongoing habitat loss - we must learn how to preserve biodiversity on a scale that protects entire ecosystems as well as the species that live within those systems (emphasis added).

Each alternative that provides ranch operating agreements (ROAs) to lessees with livestock herds known to be infected with Johnes disease-a fatal chronic wasting disease- will put elk and other ungulate populations that travel through the planning area at risk of Johnes disease. Furthermore, the state of California does not currently allow the translocation of elk outside the park because of concerns about spreading this cattle-born disease. Although tule elk do not currently exhibit the effects of inbreeding depression, such as low reproductive rates, or morphological deformities, the individual herds are at risk if they remain genetically isolated (Meredith et al. 2007) The DEIS/GMPA notes that the tule elk at Point Reyes are believed to be among the most inbred in California, but does not discuss any methods, solutions or efforts to counteract this or improve the genetic interchange of the Point Reyes herds, or whether or not reductions and maintained isolation of tule elk herds would affect the long-term viability of the population.

Furthermore, effective conservation and management of elk requires reliable information on population size, density, age structure, fecundity (birth rates), mortality (death rates), sex ratio, predation, parasites, pathogens, density dependence, genetics, stochastic events, and their use of habitats throughout the year and over time. These data were not presented for the public to understand the overall viability of the tule elk population in Point Reyes.

RRI believes the NPS should expound on the possible opportunities to manage herd size through translocation and genetic interchange throughout state populations once the threat of Johnes disease is eliminated due to cessation of ranching proposed in Alternative F.

#### Endangered California red-legged frog (*Rana draytonil*)

Livestock and ranching impacts on red-legged frogs are complex, with habitat provided for frogs by stock ponds, but many adverse impacts from grazing including removal of vegetation, trampling and siltation of streams and ponds, trampling of individual frogs or eggs, reducing habitat for invertebrates that provide prey, and decreased water quality and increased nutrient inputs from cattle manure.

The DEIS and the USFWS (2002) Biological Opinion extensively cover the numerous adverse impacts to frogs from grazing. The DEIS also notes that a variety of diversification activities could harm California red-legged frogs through mortality, capture, injury, and harassment.

RRI would encourage the NPS to expound on the potential for restored stock ponds, as well as perennial and seasonal springs and ponds to provide habitat for the California red-legged frog for proposed Alternative F.

#### Endangered Western snowy plover (*Charardrius alexandrines nivosus*)

The negative impacts of cattle grazing and ranching impacts on snowy plovers at PRNS are well documented and discussed in the DEIS. The biggest impact is from unnatural elevation of populations of common ravens near snowy plover beaches, which increases predation upon snowy plover eggs and chicks. Large raven populations are subsidized by ranch activities that provide food sources, such as livestock feeding and forage mowing that kills birds and small mammals, attracting ravens (USFWS, 2002; Point Blue, 2015).

Snowy plover populations which declined 32% from 1986-2000 largely because of nest predation by ravens (Ruhlen and Abbott 2000, Point Reyes National Seashore report).

In 2012, of the 52 disturbances to 10 predefined common murre sub-colonies at Point Reyes National Seashore, 23 events were predation events during which murre eggs or chicks were taken by ravens (Press, 2012). In this same year, juvenile brown pelican nests were also disturbed by ravens, causing loss of eggs and/or chicks. Results indicate that the proximity to ranch lands may play a role in the amount of corvid predation on common murre colonies (Press, 2012).

Starting in 2011, the National Park Service has routinely contracted with USDA Wildlife Services for targeted removal of ravens adjacent to common murre colonies in Point Reyes National Seashore. These expenses cost an average of \$40,000/y.

Press (2012) suggested immediate changes could be made by ranches to reduce common raven attraction, such as covering food troughs and calf housing areas, erecting exclusion fencing to keep cows away from sensitive areas, and prompt removal of raven food sources (e.g. uneaten or scattered feed, placentas, and carcasses).

And yet, common ravens have continued to cause number of snowy plover nest failures so far in 2019. Of the 14 nests discovered by May 15th, eight have failed; of these eight failed nests, six were preyed upon by common ravens (75%) (Lau, 2019).

The efficacy of wildlife protection at PRNS calls into question the validity of well-meaning but idealist approaches to balance conservation and restoration of natural resources/values and proposed agricultural uses in the planning area for proposed Alternatives A, B, C, D, and E.

#### Diversification

The zoning framework in alternatives B, C, and D is said to limit impacts on wildlife from authorized activities such as ranch diversification and remove grazing from sensitive resources such as riparian areas, surface waters, and federally listed species habitat. Impacts on wildlife would also continue to be avoided, minimized, or mitigated through the implementation of mitigation measures. Impacts on wildlife would remain beneficial or adverse, depending on the species.

The DEIS/GMPA promotes agricultural diversification because it "allows ranchers to react to poor forage production years and fluctuations in the economic market" (DEIS, p. 20), permits ranchers to continue...viable agricultural operations" (DEIS, p. 11), could provide a possible economic buffer for ranchers (DEIS, p. 181), accrue additional economic benefits for ranchers (DEIS, p. 181), and provide for ranchers financial security (DEIS, p. 181). None of these are valid or appropriate goals for NPS to consider as part of the DEIS/GMPA.

RRI opposes allowing any diversification, or new agricultural activities, under any alternative, due to unacceptable potential impacts to native wildlife and wildlife habitat. Diversification is included in all the alternatives except proposed Alternative A and F. Diversification would allow each rancher to add crops and previously unauthorized small livestock such as pigs, sheep, goats, and chickens to their operations. The DEIS fails to fully evaluate the impacts of this expanded agriculture on the parks wildlife or natural resources. There is no discussion of what measures will be taken when inevitably park predators such as coyotes, bobcats or foxes take chickens, lambs or other small livestock.

As mentioned above, regarding the efficacy of snowy plover protection, RRI is unconvinced the proposed attempts to avoid, minimize, and mitigate conflict with wildlife will be achieved through the proposed zoning framework. Wildlife, unfortunately, do not understand zoning frameworks. Instead, RRI recommends the NPS invoke the precautionary principle, and truly avoid, minimize, and mitigate impacts on wildlife by not allowing diversification to impair natural resource in the first place.



## Visitor Use, Experience, and Access

The DEIS/GMPA states that removing ranching operations would eliminate a unique experience for visitors to experience the role of coastal prairie ranching in California and in the historic districts in addition to discontinuing dairy operations would result in an adverse impact by removing the opportunity for visitors to observe and experience active dairy ranching in a historic district.

RRI believes the NPS overstates this impact. RRI points the NPS to a 2003 Survey conducted by Responsive Management on Regional Residents Opinions on Management Issues at Point Reyes National Seashore conducted for the Point Reyes National Seashore Association, 87% of the respondents thought the protection of wildlife habitat was a very important reason to have a National Park, while 80% of respondents thought that preservation of native ecosystems was a very important reason. Conversely, only 30% of respondents thought the preservation of small dairy and beef ranches was a very important reason to have a National Park.

## Visitor Circulation and Transportation

GMPs are required to include: (1) measures for the preservation of the areas resources; (2) indications of types and general intensities of development (including visitor circulation and transportation patterns, systems, and modes) associated with public enjoyment and use of the area, including general locations, timing of implementation, and anticipated cost. As mentioned in the Air Quality section below, RRI asked about emissions from transportation related to agricultural operations at PRNS in its 2017 and 2018 scoping comments. Not only were these not addressed, but nowhere in the DEIS/GMPA was there an assessment of intensities of development (transportation patterns of agricultural vehicles), which routinely affect road health and the public enjoyment and use of the seashore.

## Recreation development

Under alternatives B, C, D, E, and F, the NPS proposes to increase visitor use and enjoyment through new trails, expanded recreation, and addition of day use and overnight accommodations. RRI supports additional planning for visitor use to enhance trail-based recreation, day use, and overnight opportunities in the planning area that are aligned with conservation and interpretation natural and cultural resources.

Under proposed Alternative F, many of the former ranch areas and their associated facilities would be converted and offered for public not-for-profit education, research, outdoor experiential activities, and other public recreation and visitor opportunities. RRI support this concept and finds this to be aligned with practices employed at historic ranches and in historic ranching districts throughout the National Park System.

## Cultural Landscapes, Historic Districts, and Historic Structures

The DEIS/GMPA states that the desired condition for the preservation of cultural resources is that National Register of Historic Places (National Register) historic district, including contributing landscapes and structures, are preserved in a manner that maintains their integrity.

In considering impacts, the NPS states that Alternative F will result in a loss of pastures that are considered contributing sites could cause them to lose the integrity necessary to retain eligibility for listing in the National Register. Furthermore, the NPS anticipates that some dairy infrastructure may become vacant on the six dairies, resulting in potentially adverse impacts on historic structures.

RRI notes that even under Alternative F the seven qualities of historic integrity (location, design, setting, materials, workmanship, feeling and associations) relating to the ranching operation can remain intact as they have in other significant historic ranching districts such as the Santa Rosa Island Ranching District, Channel Islands National Park as well as the Hunter Hereford Ranch Historic District, Grand Teton National Park. As described in Alternative F, the NPS would apply a Historic Ranch Preservation subzone that would be managed for adaptive

reuse of approximately 24 historic ranch complexes in the planning area based on condition and integrity of the existing infrastructure.

It remains unclear why the vacancy of the six dairies, reduction in wear-and-tear, and the ability to manage for adaptive reuse and public use, interpretation and enjoyment of these resources would have adverse impacts on these historic structures.

RRI encourages park staff to look to other rural vernacular landscapes and historic ranching districts on the National Historic Register within the National Park system for inspiration. As a RRI believes the Point Reyes Ranching District and the Olema Valley Ranching District, in retaining their integrity in all landscape characteristics except land use (aside from prescribed grazing where applicable) would be of the highest benefit for the protection of natural resources and public use and enjoyment of structures and landscapes in the planning area.

#### Air Quality

Each of the alternatives states that mobile source emissions would be similar to existing conditions because a change in visitor use levels is not anticipated; however, no CO<sub>2</sub>e accounting is provided for mobile source emissions that pertain to the commercial beef and dairy ranching in the planning area. In its 2017 and 2018 scoping comments, RRI asked the NPS at PRNS to, identify what portion of the remaining park emissions from transportation sources are from ranching. No analysis is conducted to account for increase in VMTs for commercial agriculture due to the diversification of livestock proposed in Alternatives B, C, D, and E.

#### Frustration of the Public Comment Process

The NPS has stated that they will not accept public comments by fax, email, or in any way other than through the NPS comment portal website or by hard copy of comments which are mailed or hand delivered. So-called bulk comments in any format submitted on behalf of others will not be accepted. These rules seem explicitly designed to prevent public interest conservation groups from generating thousands of comments from their members through action alerts, as happened during scoping comments on the GMPA. These rules limit public participation. More public participation should be a goal of the NEPA process for this controversial management plan on public lands.

#### Conclusion

As the DEIS/GMPA is presented, Alternative F is the only proposed action in the planning area that would comply with the Organic Act, Point Reyes Act, and GGNRA enabling legislation. As such, RRI currently supports Alternative F, and looks forward to continued participation in the planning process.

Sincerely,

Chance Cutrano Director, Special Projects and Strategic Initiatives Resource Renewal Institute 187 E. Blithedale Ave Mill Valley, CA 94941 [ccutrano@rri.org](mailto:ccutrano@rri.org)

Marcia Hanscom Ballona Institute 322 Culver Blvd., #317 Playa del Rey, CA 90293 [wetlandact@earthlink.net](mailto:wetlandact@earthlink.net)  
(310) 877-2634 Nancy Graalman Defense of Place 187 E. Blithedale Ave Mill Valley, CA 94941  
[ngraalman@defenseofplace.us](mailto:ngraalman@defenseofplace.us) Jonas Minton Senior Water Policy Advisor Planning and Conservation League

#7521

Name: Francina, Suza

Correspondence: The National Park Service has a golden opportunity to help slow down gGlobal warming by phasing out ranching on our public lands in our parks.

Killing elk to raise farm animals is short-sighted and destructive to a wide range of native plants and wildlife that belong on these lands.

The proposed park management plan allows destructive levels of livestock grazing to continue on 28,000 acres of national park lands in this treasured Pacific Coast landscape, despite the numerous known adverse impacts grazing has on coastal prairie, riparian systems, springs, wetlands, and coastal dune vegetation.

The National Park Service should be managing the National Seashore for the benefit of wildlife and the natural ecology rather than subsidizing special interests at taxpayer expense.

The proposed park management plan is flawed and must be stopped. This is not what the vast majority of the American people want.

#7522

Name: Thomas, Craig

Correspondence: Comments on the General Management Plan Amendment Draft Environmental Impact Statement considering extension of ranching at Point Reyes National Seashore from Craig Thomas and Vivian L. Parker 9-23-19:

Comment 1. We have enjoyed our regular visits to Point Reyes National Seashore to hike the beaches, enjoy shorebird birding, whale watching, photographing the plant community and seeing the Tule Elk and other wildlife. We both have science backgrounds and Vivian is former Forest Service and NPS botanist. We decided to never return because on the heartbreaking level of impacts associated with the cattle ranching.

We have never been fond of the permitted ranching idea but on our last visit the degradation was so severe in terms of more than a century of cattle grazing which has altered and degraded the natural ecosystems of the park. The GMPA EIS notes impacts to plant and animal species and their habitat from cattle grazing; water pollution from cattle manure runoff; and greenhouse gases and air pollution from cattle operations, and the invasive species that are proliferating throughout this once pristine landscape.

None of the alternatives discusses the costs or timeline for mitigating these impacts. None of the alternatives considers the Seashore's restoration-what it might cost; where the NPS might focus attention; what the benefits would be to wildlife, water, climate change mitigation, or public visitation and use.

2. We are strongly opposed to the concept of "succession" and allowing permanency of use or 20-year leases. We also object to the "diversification" concept to grant further rights to ranching families to expand production of various animals beyond cattle and to grow and sell crops on this public land that is a national treasure that should be restored to its pre-ranching natural state. There is no discussion of diversification impacts to the park. Ranchers in the Seashore already have a competitive advantage over ranches outside the park. Seashore ranchers benefit from discounted grazing fees, below-market-rate housing, and maintenance and improvements to roads, homes, and farm buildings covered at public expense. Seashore ranches pay no property taxes. NPS should not grant any stronger private foothold on Point Reyes National Seashore.

3. These ranching practices are not sustainable. Manure runoff polluting the only marine wilderness south of Alaska is not sustainable, it is an outrage. Allowing cattle to give elk and other wildlife life-threatening diseases is not sustainable. Subsidizing and endorsing methane-producing confined animal feeding operations (CAFOs) in an era of climate change is not sustainable or socially acceptable. Trucking hay for hundreds of miles as a supplemental feed, because pastures are overstocked and overgrazed, is not sustainable. And now NPS is proposing to kill off the Tule Elk to maintain the ranching special status offered by the NPS.

4. Cows are not a cultural resource, the ranch houses and barns maybe but a cow is a cow with nothing historically specific about them.

5. Welfare Ranching- -The National Park Service has not provided any information on the dollar amount or portion of its budget that goes to ranching-related expenses. Ranching places increasing demands on dwindling park budgets, while park improvements and a backlog of maintenance, along with public programs and interpretation, go unfunded. Meanwhile, scarce resources go to support 24 ranchers operating in the Seashore, including killing wildlife to benefit their operations. Ranching's environmental impacts have an uncounted economic impact on the Seashore. Internal Park Service memos indicate monitoring the ranches for lease compliance and environmental damages already places outside demands on the Seashore's staff and budget. The NPS has failed to enforce lease agreements when leases are violated. Can we expect that expanded agricultural practices will be met with responsible oversight with no expansion of budget to enforce these more complex leases?

6. It is past time for the ranching on Point Reyes National Seashore to end! We strongly support Alternate F - - Ending ranching, not allowing any diversification of production or the extended allowance of 20-year leases on public NPS National Seashore.

Thank you for this opportunity to comment on the GMPA.

Craig Thomas and Vivian L.Parker

#7523

Name: Xiong, Nancy

Correspondence: Cattle and ranches are not the future. Preserve the land for the wild animals

#7524

Name: Saltsgaver, Carol

Correspondence: Protect the native wildlife.

#7525

Name: Krasnov, Alex

Correspondence: The Tule elk were extinct. Then! A single breeding pair was discovered. The herds that originated from this pair are a national treasure and the jewel of Point Reyes. Millions of visitors, this author among them, come to see the majestic Tule elk every year. Very few come to see the cattle- -cattle which are not native to Point Reyes and which reside on public land largely off limits to the public.

The broad negative environmental impacts of the cattle operations are well documented, including in the current Environmental Impact Statement. This author will state only two: competition for resources with the Tule elk and black-tailed deer in the latter's habitat and, per policy, the resulting needless death of some 250 Tule elk during the recent drought, and likely transmission of fatal paratuberculosis to the Tule elk and black-tailed deer. On the other hand, the Tule elk have largely positive impacts on their grassland habitat, increasing the diversity and abundance of native species and decreasing that of non-native ones, per recent research at Tomales Point. Furthermore, the resource equation is simple. Cattle consume approximately 5 times as much forage per day as do Tule elk, and approximately 10 times as many cattle reside at Point Reyes as do Tule elk. Therefore, the carrying capacity of Tule elk at Point Reyes is easily between 5 and 50 times the current number.

The policy considerations pertaining to natural value are equally simple. The cattle are non-native and domesticated and reside on public land. Previously, per policy, the non-native Axis and Fallow deer were removed, primarily because of competition for resources with and transmission of disease to the Tule elk and black-tailed deer. The same policy did not extend to the cattle. Later, per policy, the non-native oysters in Drakes Estero were removed. Again, the same policy did not extend to the cattle. The time has come to apply policy consistently for the conservation of this unique environment.

The policy considerations pertaining to historic value lead to the same conclusion. The current cattle operations are not consistent with conservation for the enjoyment of the public because they are not of conservational or interpretive nature, are not open to the public and do not benefit the public.

The only alternative which is ethical and lawful, and consistent with both the natural and the historic value aspects of the National Park Service mandate, "to conserve the scenery and the natural and historic objects and the wild life 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", is one that phases out all cattle operations at Point Reyes, converts the historic infrastructure to conservational and interpretive status and fully opens the utilized land to the public and to the Tule elk (Alternative F in the EIS). Any alternatives which harm or artificially restrict native animals in their habitat for the benefit of competing human operations, much less expand such operations, as does the alternative preferred by the NPS (Alternative B in the EIS), are unethical and unlawful, and perpetuate the negative impacts of human activity in this environment for generations to come.

#7526

Name: Eagle, Kathleen

Correspondence: In all future plans considering land and coastal use practices the pressing issue of climate change must be addressed as a priority, and all areas affected must be analyzed according to the practicalities of climate change. Any plan must address climate change and it's resulting effects on the environment before it can be seriously considered. Please revise the current plan with this in mind. Thank you!

#7527

Name: Zarinehbab, Nageen

Correspondence: Please leave the beautiful Elk alone! Don't allow this beautiful land to be used to torment, abuse, and kill more innocent animals like cows, pigs, chickens, etc. This is very heart wrenching and disappointing. I hope the state makes the right, moral choice and leaves the animals and the land alone.

#7528

Name: Lee, Rebecca

Correspondence: I used to live in Half Moon Bay and love Point Reyes. For God's sake, diversity is the only way any of us are to survive. Habitat is what creatures need to live to survive. We don't need any more cows, goats, sheep or chickens. We need more wild creatures to fill out the web of life. Stop destroying what our nation has designated as lands to be saved. This isn't for enjoyment, this is survival. Stop this nonsense.

#7529

Name: Krieger, Frederick

Correspondence: The following comments concern the adequacy of the analysis in the Draft EIS. - 1. Tomales Bay - Impacts on 303(d) listed waters The draft EIS should identify and assess the potential adverse impacts on the adjacent waters in Tomales Bay, including impacts on the parameters for which the Bay is classified as impaired on the Clean Water Act, 303(d) list of impaired waterways in California.

Tomales Bay is currently included on the 303(d) list as impaired due to the presence of the following pollutant parameters: • Nutrients • Pathogens • Sedimentation/Siltation

These listings were made by the State Water Boards and approved by EPA in 1992. The sources of the impairment are listed as unknown, but the presence of the Park on one side of the Bay suggests that the Park could potentially be a major source. Very limited information was presented in the Draft EIS concerning possible impacts, and no information was available on the specific concentrations of pollutants in waterways draining to the Bay or in sheet runoff entering the Bay from stock pastures. These three parameters, for which the Bay is listed, are commonly the

result of agricultural operations. In addition, the heavy sedimentation in the upper of the three lagoons at Abbotts Lagoon due to the I Ranch (?) dairy, as reported by USGS, strongly suggests that these agricultural operations have the potential for very significant adverse impacts. The USGS sampled bed sediments from each of the three lagoons at Abbotts Lagoon in 1999/2000 and found very heavy sedimentation in the uppermost lagoon. USGS also sampled for nutrients and found that most of the nutrients in Abbotts Lagoon came from the I Ranch (?) dairy operations. This information should be included in the Draft EIS.

No assessment was included in this draft concerning these past impact-have they been mitigated-and whether similar impacts may occur elsewhere in the park.

2. Compliance with Regional Water Board Water Quality Objectives and potential impacts from non-compliance  
The document states:

"...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)."

This statement is not accurate. The Regional Water Board's Basin Plan, Chapter 3, does include objectives for these parameters.

Temperature: Temperature objectives for enclosed bays and estuaries are as specified in the "Water Quality Control Plan for Control of Temperature in the Coastal and Interstate Waters and Enclosed Bays of California," including any revisions to the plan.

In addition, the following temperature objectives apply to surface waters:

- The natural receiving water temperature of inland surface waters shall not be altered unless it can be demonstrated to the satisfaction of the Regional Board that such alteration in temperature does not adversely affect beneficial uses.
- The temperature of any cold or warm freshwater habitat shall not be increased by more than 5°F (2.8°C) above natural receiving water temperature Specific conductance, turbidity, etc: The Basin Plan applies the California secondary maximum contaminate levels (MCLs) to waters potentially used for agricultural or municipal supply. The MCLs include specific conductance and turbidity.

From the Basin Plan:

3.3.22 CONSTITUENTS OF CONCERN FOR MUNICIPAL AND AGRICULTURAL WATER SUPPLIES At a minimum, surface waters designated for use as domestic or municipal supply (MUN) shall not contain concentrations of constituents in excess of the maximum (MCLs) or secondary maximum contaminant levels (SMCLs) specified in the following provisions of Title 22, which are incorporated by reference into this plan: . . .

At a minimum, surface waters designated for use as agricultural supply (AGR) shall not contain concentrations of constituents in excess of the levels specified in [Basin Plan] Table 3-6. Table 3-6 includes objectives for pH, electrical conductivity and many other parameters.

Other parameters with objectives in the Basin Plan and Ocean Plan

More importantly, the impacts on the other objectives in the Basin Plan and the California Ocean Plan are not assessed. For example, does runoff from the stock operations contain pollutants exceeding the toxic and other pollutant objectives in the Basin Plan including the secondary MCLs for aluminum, iron, color, odor, turbidity, TDS, or the Primary MCLs? (See the Secondary Drinking Water Standards In Title 22, CCR., Division 4, Chapter 15, Article 16). Does the periodic outflow from lower Abbotts Lagoon and from other Westside waterways carry

nutrients or pathogens at levels of concern into the adjacent Ocean waters in violation of Ocean Plan standards? Site-specific data is necessary to make this assessment.

The following statement in the EIS is not adequate and provides no information whatsoever on the concentrations of pollutants of concern in runoff from the agricultural operations. 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).

The draft EIS also includes this statement:

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.

This statement identifies possible regulatory options but does not assess the actual environmental impacts of the agricultural operations in the Park on the waters of Tomales Bay or the Ocean. The EIS discusses various mitigation measures to address pollution in Abbots Lagoon and Kehoe Beach but provides no data whatsoever on the concentrations of pollutants currently being discharged and the resulting impacts on fresh or marine waters.

In addition to impacts, mitigation measures should also be discussed.

3. Human/Cattle interactions In some park locations, trails for the use of park visitors pass through stock grazing areas. At times, cattle may move towards the hikers and start to gather around them. The stock are most likely curious, but this situation can be very disconcerting for those not familiar with the habits of stock animals. The draft EIS does not appear to address these impacts on Park users.

4. Impacts of overgrazing Particularly during dry years, some of the pasture lands are severely overgrazed. Overgrazed land results in increased soil erosion which carries nutrients, soil particulates, and animal wastes into waterways. Overgrazing also reduces the biodiversity of the land and ultimately decreases productivity. None of these impacts of the agricultural operations are assessed. Alternative E states:

All ranches would continue to follow specified RDM standards to minimize overgrazing. A zoning framework and applicable mitigation measures, as described under alternative B, would also reduce impacts. Continued grazing by beef cattle under alternative E would provide habitat conditions suitable for many species of wildlife that prefer grasslands. [emphasis added]

Overgrazing obviously does not provide habitat suitable for many species of wildlife. The Draft EIS should describe the conditions and frequency with which overgrazing occurs and address the impacts of the overgrazing which is very evident within the Park. Potential mitigation options should also be discussed.

#7530

Name: Vendetti, Marc

Correspondence: I support increased bicycling access in the Pt. Reyes area. Bicycling is my primary form of recreation and I love Pt. Reyes.

I'm writing to support the public access and bicycling improvements outlined under Alternatives B, C, D, E, and F. I strongly support proposals that would lead to the planning and implementation of bicycling routes on trails, ranch roads, and pathways throughout the planning area, including but not limited to: 1) a connection between Devil's Gulch and Platform Bridge Road using existing ranch roads, 2) a connection between Bolinas Ridge Trail at Olema Hill and Point Reyes Station to serve as an interim connection for the Cross Marin Trail, 3) a connection between Bolinas Ridge Trail and Five Brooks Stables using existing ranch roads 4) a connection between Drakes Estero and Abbots Lagoon Trail using existing ranch roads, 5) a connection between Marshall Beach Trailhead

and Pierce Point Road using existing ranch roads, and 6) an Estero Trail loop using existing ranch roads. I encourage NPS to collaborate with ranchers and other stakeholders to educate the public and address concerns related to public access on working ranch lands.

The improvements outlined above would enable and encourage me to visit the Seashore more regularly-and by bike, rather than car. I would feel much safer riding in the Seashore and surrounding areas on trails, pathways, and ranch roads, rather than on roads shared with fast-moving vehicular traffic. Bicycling opportunities are currently very limited and fragmented, so any improvements in connectivity and the creation of new loop options would enable me to enjoy more of the Seashore and surrounding areas by bike.

Thank you, Marc

#7531

Name: Augstein, Lynn

Correspondence: Natural wild land should be maintained as such, even if it is a designed park. Cattle should not be introduced or increased. The impact then becomes manmade. Cattle does not enhance or create the natural balance to be sustainable for the future.

#7532

Name: Kunstenaar, Patricia

Correspondence: Alternative F! Save the Park!

#7533

Name: Collett, Dede

Correspondence: I do not believe that the elk should be shot, and I desire that they spread throughout the park as they appear to be doing. The elk are a pleasure to see and hear in their "wild" way, to have them systematically killed as to maintain a specific herb, impresses me as being "manufactured.", if this occurs, I will never be able to look at the elk again in the same way - it will be just like the situation with the cattle. Staged and artificial. I would rather not have the elk in the park, then have the majority killed and a number left to present the impression of a thriving natural herd. I am at the park regularly and love seeing the Drake elk. And, when we come upon them in places where we hadn't seen them before, we are overjoyed and excited. It feels like such a betrayal to control the elk by killing them, an injustice to the elk, as well as all of us. I say, let the herd expand and die off naturally. The prospect of them being shot as a means to control the population saddens me terribly, it also is terribly disturbing.

Thank you, Dede Collett

#7534

Name: Desai, Parth

Correspondence: I'd like people to say they support alternative F, the only alternative that phases out ranches and restores the land to what it was bought and paid to be - a national park dedicated to wildlife protection. Cattle grazing is harmful to the environment in so many ways, and this space is meant for the native residents, the Tule Elk.

#7535

Name: Hipps, James

Correspondence: To The National Park Service:



I comment today because the proposed General Management Plan amendment for Point Reyes National Seashore and Golden Gate National Recreation Area fails to protect and restore these vital public lands. The Point Reyes National Seashore legislation specifically mandates that this special coastline be "protected" and "restored."

I append my comments to those of Denise Boggs, Director of Conservation Congress, who wrote: "The National Park Service should be managing the National Seashore for the benefit of wildlife and the natural ecology. Emphasizing livestock ranching while subsidizing welfare ranchers is a takings of public land. Livestock don't belong on public lands in general and certainly not in a Seashore where fecal matter can get into the ocean."

Additionally, I append my comments to those of Laura Cunningham, California Director of Western Watersheds Project, whose testimony includes this statement: "I have seen coho salmon streams (within Point Reyes National Seashore) eroded from heavy trampling by the hooves of beef cattle, native bunchgrasses grazed out of existence..."

Managers for NPS, GGNRA, or Point Reyes National Seashore should not allow hazing elk out of cattle pastures or any action to lethally remove native elk. I add my voice to oppose any such plans or proposals.

Thank you for the timely consideration of these comments.

Sincerely, James Hipps

#7536

Name: Wilson, Karen

Correspondence: Comments on Draft EIS for GMP Amendment: I, my family, and friends use Pt Reyes National Seashore often for its intended purpose "to save, preserve, or purposes of public recreation, benefit and inspiration." It is "a portion of the diminishing seashore of the US that remains undeveloped," as stated in the enabling legislation for establishment.

A modified version of Alternative D would best meet the purposes of the proposed Plan. Ranching should be discontinued in the two areas where it is inconsistent with zoning. However, no increase in the level of commercial activity should be allowed by leaseholders. Their rights to any such increases were given up when they agreed to being compensated in the 1960's. Expanding such uses as bed/breakfast or large crops or large herds of other livestock are not in the interest of purpose and need.

New lease permits on 27,000 acres for successive family members should be for terms of 10 years, which gives some guarantee of continuity, as long as conditions are met. Alternative A has good provisions, such as fencing 800 acres from cattle to protect sensitive resources. Also not to alter or limit the population level or geographic range of elk in Pt Reyes so there is no conflict with ranchers, yet an opportunity for Recreation it's to enjoy observing them.

It is important to restore the Pastoral Zone and allocate funds for this. Scientific research and public education are good uses for buildings that can be re-purposed. Although some new building and trail improvements would be good on disturbed places, generally there should be no new development.

Alternative F should be the eventual goal, long-term, since eventually ranch families will discontinue their ranching on these lands. In the meantime, improved BMPs need to be used to provide beneficial impacts on water quality. As stated, discontinuing ranching - "beneficial impacts on water quality would be noticeable, long term."

Also vacant ranch complexes should be utilized for car-camping campgrounds, larger trailhead, and other visitor facilities. Currently use is so concentrated and is becoming more and more popular. Wider distribution of visitor facilities would be best.

Serpentine habitat needs to be mapped and protected.

#7537

Name: Bullard, Britta

Correspondence: Tule elk are an important part of California's natural history. Agriculture monopolizes quite a bit of our open space and resources in California. I don't find it appropriate to prioritize cows and chickens over elk, when there are other areas already dedicated to domesticated animals. I find it your responsibility to create extensive wildlife corridors, so that elk, among other large wildlife, are able to successfully build their populations in California.

#7538

Name: Nabavi, Faramarz

Correspondence: I oppose the National Park Service plan to kill native Tule elk, grow commercial crops, and permit ranchers to add chickens, turkeys, sheep, pigs, and goats to their exploitative operations. For this reason, I support Alternative F.

As national park land, this property was specifically set aside to protect, restore, and preserve the natural environment including the wild animals who live there. The original intention was to phase out dairy and cattle ranching, not add more crops or animals to increase ranching profits.

The proposed plan does not address the damage from grazing, including water-quality degradation and soil erosion. Also, adding new crops will create more conflicts with native wild animals.

Please abandon this inhumane and destructive plan by selecting Alternative F. I urge you to restore the Seashore's Pastoral Zone for wild animal habitat and repurpose historic ranch buildings for scientific research, interpretation, and public education.

Additionally, any grazing that conflicts with native species must be eliminated.

#7539

Name: LaSasso, Victoria

Correspondence: Thank you for allowing me to provide comment for Point Reyes National Seashore's environmental impacts statement and the general management plan.

I am thankful to the planners that many of my comments during the 2018 comment process were heard. I was particularly heartened to see that Alternative F could provide absolutely incredible opportunities for public use and enjoyment of the 1/3 of the park that is mainly off-limits to hikers, campers, and other outdoor explorers; as well as wildlife that could, in time, reclaim their home.

I have traveled all over the National Park System and I believe in the potential of Point Reyes National Seashore. Though much of the land is currently in bad condition, I have read that more than half of the bird species in the United States can be found here. This means that the restoration of this coastal dune/scrub/prairie landscape could be a safe haven for birds. The American Association for the Advancement of Science published a paper last week stating that we have lost over 3 billion birds across the United States (30%) since 1970. Much of this loss, like the loss of tule elk and other wildlife, is due to the encroachment of human use of our protected lands and rural open spaces.

I am concerned that your preferred Alternative is not in line with the writing on the wall for our climate, nor the global effort to sustain and restore biodiversity. Alternative B appears to be the worst option for the planet, for biodiversity, the majority of endangered species, water quality, and public use and enjoyment. So why is that the preferred alternative? What justification does the park service have?

Scientists say we have less the twenty years to turn things around on this planet we call home. As a government agency holding this park in public trust, isn't there some obligation to mitigate all impacts? As mentioned in my scoping comments, but not addressed in this general management plan amendment, the park makes no effort to delineate a path to become carbon-neutral and instead appears to double down on animal agriculture? For what cultural resources? I've learned and explored more of Peirce Point Rance and D Ranch than any other ranch in that park. I think my family and friends would say the same. These are fantastic places to see elk, barn owls, weasels, coyotes, and other wildlife that have reclaimed the peninsula. That is the true balance of natural and cultural resources at Point Reyes and, hopefully, the trajectory of the human continuum for all our National Parks.

VL

#7540

Name: Concha-Leafequus, Ellea

Correspondence: No ranching should be allowed at all. The Tule Elk and other endangered plants and animals need help recovering from all the years excessive and unproductive ranching.

#7541

Name: N/A, N/A

Correspondence: I believe in co-existence between the elk and the ranches. I do not agree with favoring the ranches over the elk. I do not agree with the environmental impacts of the dairy industry but do agree with having them in Point Reyes as part of its history. I do not at all agree with adding to the environmental impacts by adding in other animals like chickens. I do not believe they should take precedence over the native elk herd. I do not agree with adding grazing leases impacting the water quality, grasslands, birds, native plants and wildlife, and the overall climate impact of beef and dairy with methane and other greenhouse gases, as we experience rapid climate change. I do not believe the national park should turn more into a ranch. I am fine with having these dairies over factory farming. I want our beauty and wild lands protected and I want the tule elk to be able to roam in their lands. Thank you!

#7542

Name: Rowland, Rene

Correspondence: Point Reyes GMP Amendment EIS Cicely Muldoon, Superintendent Point Reyes National Seashore 1 Bear Valley Road Point Reyes Station, CA 94956

September 23, 2019

RE GMP Amendment: Point Reyes National Seashore and the north district of Golden Gate National Recreation Area

Dear Ms. Muldoon,

On behalf of PawPAC and its 6,000 members, I write to support the Tule Elk Preserve at Point Reyes Seashore. A preserve was established for the elk, yet corporate interests would undermine the elks and undercut the peoples interest in one of our national, public treasures. Sustained by tax dollars of the many, the National Park Service should not accept private arrangements from the few. That is to say, We, the Public do not support priority given

to private cattle and dairy ranchers on public lands that we fund. We do not support 20-year grazing permits. And we do not support killing the elk to clear the land.

Since 2006, dropping meat and dairy became a sweeping movement after the Food and Agriculture Organization of the United Nations released its groundbreaking report that the animal agriculture sector is responsible for approximately 18%, or nearly one-fifth, of human-induced greenhouse gas emissions. Now, it's a matter of life and death, as humanity faces an irreversible fate due to global warming, unless we stop all routes to advancing global warming. Ethics and the preservation of not only the Tule elk's home, but the planet that sustains life for all, are fully enough reason to disallow any lease with private ranching operations. These arguments are neither vague nor unresearched. The tax-paying public should not even be put in a position to defend what has already been granted us: our national parks and preserves.

Sincerely,

René Rowland, Chair

#7543

Name: Allen, Sarah

Correspondence: Thank you for the opportunity to comment on the Draft General Management Plan Amendment (DGMPA) for Point Reyes National Seashore (PRNS) and the North District of Golden Gate National Recreation Area (GGNRA). The document is extensive but lacks important information for the parks to properly manage the resources that they are entrusted to protect unimpaired for future generations of the American public. Under the preferred alternative (Alternative B), the parks likely will be significantly altered because of the probable effects on resources from diversifying ranching activities. Diversifying ranching operations to include grazing sheep, goats, pigs, and developing row crops expose park resources to potential new threats. Each of these types of ranch animals graze in significantly different ways, magnifying already existing stresses to natural resources such as air and water quality, native biodiversity, and introduction of non-native species and livestock diseases. While the document notes that diversification will not include ducks, geese, turkeys and rabbits because of potential disease or parasites, it lacks information on the potential conflicts with native wildlife and the introduction of zoonotic diseases to wildlife from sheep, goats and pigs. There is little information on how management proposes to mitigate wildlife conflicts with native predators that do not prey on cattle but will attempt to prey on smaller livestock. Also, the document contains recommendations for testing of disease, especially Johne's disease, in native elk but not for testing livestock that may introduce disease to native wildlife. The California Department of Food and Agriculture provides extensive information on the risk of disease introduction (see [https://www.cdfa.ca.gov/AHFSS/Animal Health/Swine Health.html](https://www.cdfa.ca.gov/AHFSS/Animal%20Health/Swine%20Health.html)). The preferred alternative provides little analysis to explain potential impacts to park resources and the public by diversifying ranching. The preferred alternative supports agricultural resources over natural resources by increasing existing agricultural livestock numbers with the addition of diversification while reducing native Tule elk numbers to a threshold of only 120 and preventing any new elk herds within the park. Lethal management of native wildlife to benefit commercial interests of a lessee are prioritized over the adaptive management strategies that are outlined in recommendations provided in the 1998 Tule Elk Management Plan. The herd threshold of 120 elk is not based on a comprehensive scientific review of factors other than forage competition with cattle. Strategies to manage elk populations should be in the context of managing other resources within the Seashore such as water quantity and quality. Finally, Tule elk in the pastoral zone should be managed in the context of the overall population level in the park. The preferred alternative lacks any analysis of anthropogenic climate change effects with ranch operations. The document does report on the magnitude of carbon dioxide contributed by livestock under existing conditions but does not report on the additional contribution from diversified livestock. Scientists have documented projected and existing effects of anthropogenic climate change on resources at the parks (see Gonzalez et al. 2018). Most models, including downsized models for the San Francisco Bay Area predict increased rainfall and drought events. The six year drought in this century that had direct effects at Point Reyes is a stark example of the types of environmental conditions that projected climate changes will have on the parks. Scientists have already documented declines in biodiversity and other changes in birds at the Palomarin Field Station at

Point Reyes related in part to changes in climate (Ballard et al. 2003 and Goodman et al. 2011). Vulnerability assessments of bird species (see Gardali et al. 2012) are especially important to apply to protected areas such as parks, which are often the last refuge for rare and endangered species. The U.S. Committee of the North American Bird Conservation Initiative (NABCI) just released an alarming report on the status of birds in North America (<https://www.stateofthebirds.org/20190> where they document a 30% decline of birds over the past 50 years. The proposed actions of the DGMPA (diversification of livestock, introduction of thousands of chickens, brushing, manure spreading, and silage production) will further depress bird diversity and abundance at Point Reyes. The omission of climate change projections in the DGMP A analyses seriously hinders managers from adaptively managing parks to preserve and protect birds and other irreplaceable natural resources. The National Park Service (NPS) Natural Resource Stewardship Strategy (2016) presents four pillars to guide NPS "to adapt and respond to continuous change, with a focus on long-term ecological integrity and viability." One pillar, "Hold the Line" is especially pertinent to the DGMP A because it emphasizes the importance to "conserve and restore biodiversity and ecosystem integrity." The proposed addition of diverse ranching practices will accomplish the opposite intent of this stewardship strategy by reducing native biodiversity, increasing wildlife conflicts, and introducing non-native species and disease at a time when environmental challenges are unprecedented because of climate change. As noted in the Report Revisiting Leopold: Resource Stewardship in the National Parks (2012), "Environmental changes confronting the National Park System are widespread, complex, accelerating, and volatile." Now is the time to work creatively with ranchers to face the immediate and urgent challenges of climate change by reducing their carbon footprint from ranching/livestock emissions (24,611 metric tons of CO2 per year compared to mobile source emissions of only 3,734 per year; page 96 of the DGMPA) as well as other practices, while continuing their historic beef and dairy ranching. Thank you for the opportunity to comment and for your efforts to resolve such complex issues while preserving these precious resources.

Gardali T, Seavy NE, DiGaudio RT, Comrack LA (2012) A Climate Change Vulnerability Assessment of California's At-Risk Birds. PLoS ONE 7(3): e29507. <https://doi.org/10.1371/journal.pone.0029507> Gonzalez, P., F. Wang, M. Notaro, D.J. Vimont, and J.W. Williams. 2018. Disproportionate magnitude of climate change in United States national parks. Environmental Research Letters 13: 104001. doi: 10.1088/1748-9326/aade09. Goodman et al. 2011. Avian body size changes and climate change: warming or increasing variability? Global Change Biology. <https://onlinelibrary.wiley.com/doi/abs/10.1111/j.1365-2486.2011.02538.x> Grant Ballard, Geoffrey R. Geupel, Nadav Nur, Thomas Gardali, Long-Term Declines and Decadal Patterns in Population Trends of Songbirds in Western North America, 1979-1999, The Condor, Volume 105, Issue 4, 1 November 2003, Pages 737-755, <https://doi.org/10.1093/condor/105.4.737> National Park Service. 2016. National Park Service Natural Resource Stewardship and Science Framework. [https://www.nps.gov/orgs/1778/upload/NRSS\\_Framework\\_Four\\_Pillars\\_-\\_WCAG\\_2-0AA-1.pdf](https://www.nps.gov/orgs/1778/upload/NRSS_Framework_Four_Pillars_-_WCAG_2-0AA-1.pdf)

#7544

Name: Huey, Pat

Correspondence: I urge the National Park Service not to kill Tule Elk at Point Reyes National Seashore in order to protect the profits of the beef and dairy industry. Tule Elk, which are native to Point Reyes, were exterminated and then reintroduced by the National Park Service. Now the beef and dairy ranchers, which no longer own the land they occupy, want extend their land leases and cull the Drakes Bay Tule Elk herd. We ask the Park Service to protect wildlife over industry profits and select the alternative of no ranching and protection of the Tule Elk herd. Point Reyes National Seashore is a biologically diverse park that visitors from all over the world come visit to see the Tule Elk. Our National Parks are for nature not agribusiness.

The tule elk have been here for thousands of years and are essential to the biodiversity of Point Reyes. Ranching is killing our environment.

#7545

Name: Dent, Sidney

Correspondence: Dear Ms. Muldoon, I attended the workshops last month which showed the same plans as I saw

last year. I have learned since last year that female elk can be darted with contraceptives, yet David Press, your employee (who announced the tragedy of the 200 dead elk in 2015), seems not interested in pursuing this option. With the current burning of forests worldwide and the fact that raising cattle contributes very significantly to global warming, I beg you to consider removing cattle from Point Reyes National seashore and permit the area to be a sanctuary for Tule Elk and also an area of reforestation. To offset climate change, it is said we need to plant a million trees. Why not use the land that has been degraded by the cattle for trees? Any actions to prolong the cattle and dairy industries on this public land will be judged as contributions to the destruction of our planet.

#7546

Name: McIntosh, Beverly

Correspondence: 1. I oppose the proposal to allow horse boarding in the Ranch Core subzone for the following reasons: Horse boarding facilities visible from our west Marin roads, especially along the Road between Sir Francis Drake and Nicascio are abusing the land. The paddocks are bare ground; the exposed surfaces drain directly into streams; the hillsides are also bare. This is the worst kind of stream abuse. Why should we expect property mgt. to be in the Seashore to be different? In addition, only food and fiber production are identified as agricultural uses. Horse keeping is not an agricultural use according to the Marin County General Plan.

2. Visitor Experiences and access Allowing increased visitor access by increasing the number and or width of trails in addition to the potential to allow e-bikes in the SeaShore can only lead to increased management problems. All of the visual and physical impacts of bikes in and on Marin's Open Space District trails are only too visible for all to see and provide an object lesson for PRNS management. In 1993 for example, adjacent to the open space and Nature Center located on the north side of Highway 92, bordering the eastern approach to the San Mateo Bridge, a trail extension to allow access to a way across Highway 92 was proposed. The Bay trail is next to the shoreline and the trail leading to the bike crossing at the freeway cuts diagonally through the marsh/wetland habitat. A study conducted in Marin in 1985 to document impacts of trails on marsh habitats documented measurable losses of plant and animal resources adjacent to the trails and additional impacts extending out from the trails. Why should the PRNS expect a different result? 3. Managing the Tule Elk The document does not provide actual evidence of consultations with the California Dept. Of Fish and Wildlife, especially concerning the possibility of relocating the excess elk to suitable habitat in other locations in California. The Tule elk were widely distributed in California, ranging from coastal areas to 3,000' elevations. Relocation would allow the separation of the small groups of the inbred herd to other locations. Culling should be used very selectively and thoughtfully.

4. Consultation and Coordination PRSN is an integral part of the Golden Gate UNESCO Biosphere Reserve. The Reserve was created in 1988.(see attachment). There two MABs in France that share the same challenges as PRNS. The Reserve in Brittany, Iles et Mer d'Iroise actually had staff members working here in the mid 1990's with our people doing research for GGNRA. It was a 4 year contract. There must be records of this somewhere. In addition. The Cevennes Biosphere Reserve in the mountainous region of central France, contains France's only park that includes active agriculture. They also have an elk, referred to as the RED DEER, Cervus elaphus that was extirpated from the region in years past. The Park was working on a reintroduction program when I visited there in 2006. PRNS could benefit from the experiences of the staff at the Cevenne National Park Headquarters(see attachment). For local GGBiosphere information the contact is: Lia J Hull. c/o Jasper Ridge Bio Preserve, Stanford University, CA 94305-5020 Conclusion In conclusion, I fully support the positions of MALT, Phyllis Faber and all the dedicated ranchers of PRNS.

[\*NOTE: Attached is an article, Golden Gate Biosphere: Celebrating the World-Class Natural Treasure in our Backyards]

#7547

Name: Kramer, Ann

Correspondence: I recently visited Point Reyes NP Seashore for the second time. I've been making it a practice to visit the National Parks within the Western States as I'm a California resident and plan to retire soon. I enjoy the

rolling hills of Point Reyes NP, the climate, the assorted wildlife, the Lagoon, and the city. It's a beautiful spot. I've seen, on my two visits, Bobcats, a Weasel, River Otters, Badgers, Hawks, Osprey, Elk, Coyotes, Herriers and a skunk! It is refreshing to see wildlife in it's natural habitat free from encroachment. I learned of the proposed changes to the park by the National Park Service. The plan to cull (kill) the elk herd to maintain 120 and to convert some of the land to crops and farm animals was stunning and sad to me. I had to read it a couple of times to believe what I was reading. It is incomprehensible to me how a National Park could be developing land with crops and more farm animals when there are abundant acres of farm crops all over California. I think it is the mission of National Parks to protect and preserve what is wild and natural. How do crops and farm animals serve that goal? My understanding of PRNS was that when the park became a dedicated national park, the ranches in the area were allowed to continue their ranches for 25 years or the life of the owner. That has long been surpassed and it looks as though there is no intention for the ranches to be eliminated or finished. It's an odd thing for me to drive through a NP with cows in every sector of the park. I have to surmise this tolerance and violation of the original agreement is a contributor to these current decisions which will further put the nature and wildlife at peril. How will a bobcat or a coyote or a hawk or any other predator be treated when they invade crops? What about small animals? Is a predator likely to know this is hands off? There is already a bit of a war going on with ranchers and coyotes. How will these new rules provide sanctuary for wildlife? We are undergoing a reversal in our current political environment for concern for environment, protection of wildlife and endangered species, provision of migration paths, protection of national parks and wetlands. This administration has consistently catered to money and industry over the welfare of our country, it's people and our natural resources. I did not expect this to extend to California and I am further disheartened and angry to see these decisions. I'm strongly against what the National Park system is allowing here. This would be an opportunity in the least to set an example for the nation and how to manage cattle and nature in some coexistence, to live with respect for one another. We are, after all, on their land. Respect for the natural should, in the least, be a priority in a National Park. I implore you to reconsider this decision. It is obvious that these decisions are based on money and the undermining of what a National Park is intended to be. A Cree proverb: "Only when the last tree has died and the last river has been poisoned and the last fish has been caught will we realize we can't eat money." And, we can't breathe it, or visit it, or find our connection with ourselves and nature in it either. Thank for your time and consideration in this matter.

#7548

Name: Levin, Jeff

Correspondence: Dear Sir: Why in the world would anyone want to curtail one of the most successful wildlife reintroduction projects in California's history? I have read there were once about 500,000 tule elk stretching from the lush floodplains of the Central Valley to the grassy coastal hills in California, but by 1874 they were thought to be extinct. What I learned is that early mariners and explorers wrote about vast herds on the Point Reyes peninsula, but these herds were hunted relentlessly after the Gold Rush. Consequently, their habitat was converted to crops and cattle grazing land. I understand that after a wealthy landowner, Henry Miller, discovered a dozen or so tule elk in Kern County, the herd grew. Gratefully, the elk became protected in 1971. The effort to restore tule elk populations has progressed very well. I heard that in 1978, 10 tule elk were moved to the 2,600-acre Tamales Point Elk Reserve at Pierce Point. Apparently, their success there encouraged the Park Service to move 28 animals to the Limantour Beach area, in 1999. According to what I read, within two years, the free-ranging herd had split up, with some apparently swimming across Drakes Estero, where they began grazing among the cows near the historic ranches. There are now three elk herds. According to the winter count, 95 freeranging elk live in the Drakes Beach area, and 130 hang out in the vicinity of Limantour Beach. There are 285 animals in the fenced reserve at Pierce Point. It flies in the face of history to protect cattle grazing at the historic ranches when 500,000 tule elk narrowly escaped extinction because of it! We now are graced by about 4,300 tule elk in 25 separate herds in California. Killing any of them in favor of cattle grazing is criminal. Surely, our sacred public trust is honor, celebrate and protect the natural biodiversity of our national parks. Please do not constrict the long nurtured comeback of tule elk herds. I can't imagine a single visitor to Pt. Reyes National Seashore just hoping to catch sight of cattle, or to see a ranch. In fact, I often travel to Pierce Point Road specifically in order to see at least one tule elk. Please respect wildlife over cattle. The elk herd deserves and needs our protection. Their expansion is our

success story. In good faith, we need to continue to support and celebrate their comeback from the brink of extinction.

#7549

Name: Ray, Dan

Correspondence: Dear friends: I am writing to urge your adoption of Alternative B of the Pt. Reyes National Seashore general management plan (GMP) amendment addressing grazing at the seashore and the Golden Gate National Recreation Area. I have been a frequent visitor to the seashore, beginning in 1973. I enjoy it in many ways - hiking, birdwatching, beachcombing, sightseeing, and backpacking. I have also seen it as a professional environmental planner, including time as California State Parks' planning chief, a Coastal Commission analyst, and a lifetime member of the American Institute of Certified Planners with expertise in ecosystem management and conservation of agricultural lands. Key points underlying the continued ranching use of these seashore and GGNRA lands are documented in the amendment's draft EIS. Already, three fourths of the seashore and seven eighths of GGNRA are managed for primarily natural values. Areas where grazing is allowed are a modest fraction of the NPS' lands. Wildlife, fish, and native plants on the NPS' wildlands are unharmed by agricultural uses elsewhere in the seashore. Because of the seashore's benign coastal climate, its pastures and grazing lands are unusually productive 1. Continued grazing helps control wildfire risk and maintains native prairies. Farming systems that reduce environmental effects of grazing, such as those proposed in Alternative Bs resource protection zone, can help to further integrate continued agricultural use with wilder parts of the parks. Importantly too, continued agricultural use of these lands will sustain family farming as a living culture, not simply an historical artifact, at the seashore, enriching interpretive opportunities, recreational potential, and visitor experience. I have seen firsthand, at California State Parks' Coast Dairies property near Santa Cruz, the limited visitor interest and maintenance liabilities of historic farmsteads without livestock, other agricultural use, and farm families. The seashore's and GGNRA's agricultural lands and the 24 families who farm them are critical, too, to the landscape within which the parks sit. They comprise a sixth of Marin County's farmland, an eighth of its dairies, and a twelfth of its cattle ranches. Despite their modest acreage, they produce over 40 percent of the county's milk, supporting world class cheesemakers such as Cowgirl Creamery and key regional milk processors including Clover Stornetta. Terminating agricultural use of the parks' lands would undermine the region's agricultural economy and protection of Marin's 140,000 acres of private farms and ranches by injuring the agricultural infrastructure and economy that support them. Indeed, the NPS' farmlands are unique among those in Marin County because they are protected from a threat identified as the greatest peril to agriculture there - conversion of agricultural properties to nonagricultural rural estate<sup>2</sup>. By protecting lands for exclusive agricultural use, removed from the risk of conversion to estates, the NPS' lands provide a protect a stable core of the region's farm economy. Because the NPS' lands are available by lease, rather than purchase, over time they may even provide opportunities for entry of young farmers who are unlikely to be able to afford to purchase private farms and ranches on the coast. Since its establishment, the seashore and its west Marin environs have modeled how people and nature can coexist harmoniously. Please continue that tradition by adopting Alternative 8.

#7550

Name: Wilbur, Kirk

Correspondence: [note for reviewer: footnotes added as \* after number] Re: Draft Environmental Impact Statement for Point Reyes National Seashore General Management Plan Amendment Dear Superintendent Muldoon: The California Cattlemen's Association, California Farm Bureau Federation, National Cattlemen's Beef Association, and Public Lands Council appreciate the opportunity to provide feedback on the Draft Environmental Impact Statement (DEIS) for the Point Reyes National Seashore (PRNS) General Management Plan Amendment (GMPA). The California Cattlemen's Association (CCA) represents more than 1,700 cattle ranchers throughout the state of California, including many of the beef ranchers throughout the PRNS and the Golden Gate National Recreation Area (GGNRA). The California Farm Bureau Federation (CFBF) is a non-government, non-profit, voluntary membership California corporation whose purpose is to protect and promote agricultural interests throughout the state of California and to find solutions to the problems of the farm, the farm home and the rural community. CFBF currently represents nearly 36,000 members throughout California,



including many of the beef ranchers and dairy producers at PRNS and the GGNRA. The National Cattlemen's Beef Association (NCBA) is the national trade association representing United States cattle producers, with more than 25,000 individual members throughout the nation. The Public Lands Council (PLC) is the only organization devoted solely to representing the 22,000 cattle and sheep producers who hold public lands grazing permits throughout the western United States, and counts among its members all lessees within the PRNS and the north district of the GGNRA. Our organizations have long been actively involved in issues of ranch management at PRNS and GGNRA, previously engaging throughout every phase of the now-superseded Ranch Comprehensive Management Plan process and in the initial public comment and scoping periods of the current GMPA process, in addition to numerous other policy issues on which we have engaged the PRNS Superintendent. We urge NPS to examine our prior correspondences with the Service in addition to these comments as it develops its Final EIS/GMPA. Our organizations generally favor Alternative B, the NPS Preferred Alternative, of the DEIS, though we propose additional significant edits to the Alternative regarding Tule elk management and on-ranch diversification activities, as detailed below, prior to finalization of the EIS/GMPA.

### 20-YEAR LEASES

Our organizations are pleased to see that the NPS Preferred Alternative continues to contemplate 20-year leases for the beef ranchers and dairy producers at PRNS. In our November 30, 2018 scoping comments, our organizations stressed that short-term leases stymie efforts at good stewardship by limiting ranchers' ability to obtain external financing for ranch improvements that could benefit the land. Additionally, without any intermediate- or long-term certainty regarding the continuation of ranching [leases], ranchers are hesitant to invest their own capital in ranch improvements, as there is no assurance that they will see returns on those investments. Implementing 20-year leases at PRNS will improve the economic viability of ranch and dairy operations and will result in further investments which benefit the Seashore's land, water, and wildlife resources. Our organizations strongly support the inclusion of 20-year leases in the Final EIS. Annual Ranch Operating Agreements will adequately allow the Seashore and ranchers to respond to any on-the-ground challenges that arise during the life of the 20-year leases, and will ensure conservation of the Seashore's environmental resources.

### ELK MANAGEMENT

Among the most important considerations of the DEIS and GMPA is improved management of Tule elk. Improved elk management is necessary not only to reduce impacts upon the historic ranches and dairies of the Seashore, but also to ensure that the elk population remains stable and viable. Between 2012 and 2015, extreme drought conditions in California led to lack of water and available forage that devastated the Tule elk herd at Tomales Point. During that period, the Tule elk population at Tomales Point declined from 540 animals to 286. 1\* While the same fate did not befall the Limantour and Drakes Beach herds of Tule elk—partly because those herds had access to the forage and water resources of the ranches and dairies at the Seashore—the fate of the Tomales Point herd teaches the lesson that elk populations should not be allowed to grow unchecked. Resource scarcity in California is an unfortunate reality, whether due to recurring droughts, wildfires, or other causes; if elk herds grow unmanaged, they risk devastation during these periods of scarcity. To avoid this, the Final EIS/GMPA must improve management of elk at Point Reyes. 2\* Additionally, improperly managed Tule elk wreak havoc on the ranches and dairies of the Seashore. In prior communications with the Point Reyes National Seashore in response to the now-abandoned Ranch Comprehensive Management Plan<sup>3\*</sup> and the Notice of Intent to prepare the present DEIS,<sup>4\*</sup> our organizations previously outlined the "devastating and well-documented" impacts that Tule elk have caused at Seashore ranches and dairies, including (1) competing with livestock for forage, often necessitating the purchase of supplemental feed (2) damaging fencing and other ranch and dairy infrastructure, (3) threatening lessees' compliance with PRNS grazing standards, such as residual dry matter standards, and (4) threatening organic or other certifications obtained by lessees, among other impacts. Additionally, elk incursions into the pastoral zone risk transmission of serious diseases, such as Chronic Wasting Disease and Johne's Disease, to cattle. To remedy these impacts, we once again suggested that NPS "take immediate action to remove elk from the pastoral zone and ... ensure that elk do not return to the pastoral zone." Geographic Distribution The DEIS states that "The management of free-range elk under alternative B [the NPS Preferred Alternative] would allow elk in the Point Reyes portion of the planning area but with limited geographic distribution ... on areas under lease/permit." 5\* With regard to "limited geographic distribution," the DEIS clarifies that the Drakes Beach herd would be geographically limited to "its existing core area (i.e., between Barries Bay and the C Ranch and B Ranch boundary)." 6\* Troublingly, this existing core area almost entirely overlaps the C Ranch/D Ranch dairy operation and the E Ranch and F Ranch beef cattle operations. 7\* With regard to the Limantour Herd, the DEIS states that "Hazing and lethal removal may be used to manage the geographic extent if individuals establish outside the core use areas" and that "Elk from the Limantour herd would be allowed to wander outside a core area, if they do not establish new herds." 8\* According to Figures 2 and 3 of Appendix A, however, existing core use areas of the

Limantour Herd exist on ranches, including portions of the D. Rogers Ranch, M Ranch, N Ranch, and Home Ranch. Limantour Herd elk already roam on ranches outside of those core areas, including H Ranch and L Ranch. While the DEIS states that "actions may be taken to mitigate for impacts on ranching operations,"<sup>9\*</sup> the fact that the GMP A perpetuates the status quo by allowing elk to continue to utilize significant swaths of ranch property means that ranches will continue to see significant elk-related impacts from the Limantour Herd.<sup>10\*</sup> Unfortunately, the DEIS and GMPA do not appear to contemplate the appropriate removal of Tule elk from ranches, instead proposing to maintain Tule elk in core areas which already exist on the ranches. Indeed, NPS explicitly dismissed from further analysis two proposed alternatives raised in the scoping process which aimed to exclude Tule elk from ranchlands: (1) Fencing Elk into Specific Geographic Regions and (2) Complete Removal of Elk from Ranchlands. The DEIS rejects the concept of fencing elk into specific geographic regions, citing as reasons for this rejection "the high cost of construction and maintenance of a fence."<sup>11\*</sup> While our organizations recognize that construction and maintenance of a border fence may be costly, we believe that NPS could see significant cost savings as a result of conducting less monitoring and management associated with elk which would otherwise stray onto ranchlands-including hazing, rebuilding livestock fencing damaged by the elk, and lethal removal of elk. Additionally, our organizations believe the construction of such a fence would be feasible, as livestock fencing is already present in the area. The Final EIS should explore as an alternative the construction of elk fencing between the Phillip Burton Wilderness Area and the ranchlands, and should consider this alternative in comparison with the costs of monitoring and management contemplated under the NPS Preferred Alternative. The DEIS also rejects the complete removal of elk from ranchlands, arguing that "the roughly 50 individual elk that move onto ranch lands from the Limantour herd do not affect the forage availability or RDM for ranches in that area."<sup>12\*</sup> Ranchers at the Point Reyes National Seashore reject the notion that the elk "do not affect the forage availability or RDM for ranches," noting that elk forage consumption requires ranchers to either (1) reduce their stocking rates or (2) purchase and import supplemental feed for their livestock. Both come at a significant cost to ranchers, place them at a significant disadvantage compared to ranchers elsewhere in the state and country, and threaten the viability of ranching operations which already operate on thin profit margins. The DEIS also justifies rejecting the complete removal of elk from ranchlands on the basis that "in an extreme scenario, such as a fire ... all free-ranging elk could temporarily move onto the ranch lands to forage," and that "the Tamales Point herd occasionally enter ranchlands, so complete removal of elk from ranchlands is not feasible."<sup>13\*</sup> Our organizations appreciate that ensuring that elk never enter ranchlands may be infeasible. But the EIS need not choose between the status quo geographic distribution (in which the Limantour Herd and possibly the Drakes Beach herd are allowed to remain within all established core areas on ranchlands) and complete removal, without fail of elk from ranchlands; a middle-ground can be sought. The Final EIS ought to consider an alternative which strives to remove elk completely from rangelands, but which recognizes that elk may infrequently enter ranchlands nevertheless-as with the Tamales Point herd-and that "in the event of an unforeseen circumstance that causes the herds to completely move, NPS would reevaluate the impacts and management approaches as needed to ensure maintenance of a free-ranging herd in Point Reyes" <sup>14\*</sup>-as is already contemplated under the NPS Preferred Alternative. In drafting a Final EIS, our organizations urge the NPS to more fully examine the impacts of Tule elk upon ranching and dairy operations and to examine alternatives which seek to exclude Tule elk from ranchlands. With regard to the Drakes Beach herd, this exclusion may be undertaken by adopting Alternative C's lethal removal proposal, by installing exclusionary infrastructure which limits the elk to the small portion of the Drakes Beach area upon which ranching does not occur (which would require an attendant reduction in the target population level), or examining the "Translocation in the Park" alternative rejected by NPS in the DEIS (perhaps in conjunction with the "Fencing Elk into Specific Geographic Regions" alternative likewise dismissed from further analysis). With regard to the Limantour Herd, the Final EIS ought to fully examine alternatives dismissed for prior analysis in the DEIS which would exclude the Limantour elk from ranchlands, including the "Fencing Elk into Specific Geographic Regions" alternative and the "Complete Removal of Elk from Ranchlands" alternative. Finally, the Final EIS should include within its appendices a map which clearly showcases the geographic distribution of elk which is contemplated under the GMP A, as the DEIS fails to incorporate maps which demonstrate the permitted range of elk under each of the contemplated Alternatives.

**Herd Size** While the DEIS states that the NPS Preferred Alternative "would allow elk in the Point Reyes portion of the planning area ... with ... controls on herd size," <sup>15\*</sup> it only sets a population goal for the Drakes Beach herd (120), establishing no such herd size target for the Limantour Herd. In our scoping comments to the NPS regarding this GMP A, our organizations asserted that it is essential that the NPS carefully analyze the Phillip Burton Wilderness Area's carrying capacity for tule elk (factoring in available forage and water) as a basis for establishing a reasonable

population limit for the elk. Once such an appropriate management level is identified, the NPS should develop a detailed plan for managing the elk population to ensure that it does not exceed the population limit. Any population limit should be conservative in nature, accounting for a wide variety of environmental factors that could impact the elk population, including the likelihood of future drought conditions in the region. It is unfortunate that this analysis of the Limantour Herd was not undertaken in the DEIS, and we urge NPS to resolve this oversight in the Final EIS. Examining the carrying capacity of the Phillip Burton Wilderness Area would also further NPS' s goals as stated in the 1998 Tule Elk Management Plan/EA "to maintain viable populations of a free-range elk herd in Point Reyes" 16\*: in order to maintain a viable population, NPS must determine what constitutes a viable population and at what point overpopulation might threaten the herd's viability. Translocation of elk elsewhere in the state The NPS Preferred Alternative states that "NPS would manage the Drakes Beach herd to the population threshold using ... translocation outside the park" to a state-managed herd elsewhere in California if practicable.17\* Our organizations oppose translocation of Tule elk from Point Reyes to elsewhere in the state. Agricultural operations elsewhere in range of California's statemanaged Tule elk herds have reported conflicts similar to those reported at the Point Reyes National Seashore. Translocation of Tule elk elsewhere in the state would simply shift the burden from ranches and dairies at PRNS to farmers, ranchers, and dairies elsewhere in the state. Additionally, translocating elk elsewhere in the state risks transmission of serious diseases, such as Chronic Wasting Disease and Johne's Disease, to cattle and other wildlife. To avoid further elk/agriculture conflicts, the Final EIS should not consider translocation of elk to herds elsewhere in the state. DIVERSIFICATION Our organizations appreciate that the DEIS/GMP A contemplates opportunities for flexibility and increased diversification of farming and ranching operations on the leased properties within the Seashore. However, we believe that the DEIS/GMPA is overly-limiting in terms of what diversification will be allowed on the ranchlands ( e.g. the blanket prohibition on row crops exceeding 2.5 acres). The ability to diversify one's farming/ranching operation is essential to ensure an agricultural operations' viability in response to economic, environmental, and other stressors. In examining which diversification activities will be permitted and to what extent diversification on the ranches will be permitted, the Final EIS should examine diversified agricultural operations elsewhere in Marin County. Additionally, in an effort to effectuate the Point Reyes National Seashore Enabling Act's mandate of historical preservation, the Final EIS ought to examine the historical role of other farming and ranching operations at the Seashore, which included irrigated and non-irrigated row crops such as beans, peas, barley, artichokes, etc.; other livestock species aside from cows and chickens; and on-ranch activities such as processing and sales. ALTERNATIVES D, E, AND F Our organizations continue to believe that Alternatives D (Reduced Ranching), E (No Dairy Production), and F (No Dairy or Ranching) violate the law and would be catastrophic to the economy of Marin County, and should therefore be rejected in the Final EIS/GMPA. Alternatives D, E, and F are inconsistent with laws governing the PRNS and GGNRA As we noted in our scoping comments, and as NPS notes in the DEIS, 18\* the Point Reyes National Seashore Enabling Act seeks to promote, among other things, "historic preservation ... of the natural environment within the area" of the Seashore and the Golden Gate National Recreation Area Enabling Act established the GGNRA in order to preserve outstanding "historic ... values." Cattle grazing has occurred at PRNS and GGNRA since as early as 1820, and is a fundamental element of the historical value of the area. Any alternative which seeks to diminish or remove dairy production and cattle ranching from the PRNS and GGNRA would explicitly violate the intent of Congress in establishing these areas. Indeed, as the DEIS notes, just this year a Joint Explanatory Statement regarding the Consolidated Appropriations Act of 2019 clarified that "multi-generational ranching and dairying is important both ecologically and economically" and is "fully consistent with Congress's intent for the management of Point Reyes National Seashore," and that the conferees support the NPS Preferred Alternative.19\* Alternatives D, E, and F, then, would violate the plain language of the Point Reyes National Seashore Enabling Act and the Golden Gate National Recreation Area Enabling Act, and would violate Congressional intent. Consequently, these alternatives should be rejected in the Final EIS. Alternatives D, E, and F are inconsistent with the Coastal Zone Management Act of 1972 As we noted in our scoping comments, the federal consistency provision of the Coastal Zone Management Act of 1972 requires that "Each Federal agency activity within or outside the coastal zone that affects any land or water use or natural resource of the coastal zone shall be carried out in a manner which is consistent to the maximum extent practicable with the enforceable policies of approved State management programs."20\* The Marin Local Coastal Program approved by the California Coastal Commission explicitly "recommends that agriculture in the GGNRA and PRNS be encouraged" and the "continuation of the agricultural operation[s]"21\* there. As discussed more fully in our scoping comments, Alternatives D, E, and F would violate the Coastal Zone Management Act's consistency provision because those alternatives violate the State-approved Marin Local Coastal Program by

discouraging and/or discontinuing the beef and dairy operations at the Seashore. Unfortunately, the DEIS fails to examine whether Alternatives D, E, or F would be consistent with "approved State management programs" in accordance with the Coastal Zone Management Act.<sup>22\*</sup> We encourage NPS to conduct federal consistency analyses for each Alternative in the Final EIS, and to rely on this inconsistency with the State-approved Marin Local Coastal Program as a justification for dismissing Alternatives D, E, and F. Alternatives D, E, and F would devastate Marin County's economy. Our organizations largely approve of the DEIS' analysis of the economic impact of agriculture at PRNS and GGNRA upon Marin County and surrounding areas. The DEIS' analysis of directly-supported, indirectly-supported, and induced jobs from the economic activity at PRNS and GGNRA reflect the information available to our organizations at the time we prepared our scoping comments, and we are pleased to see this information reflected in the DEIS. One element in which the DEIS' analysis of "Agriculture in Marin County and the Planning Area" could be improved, however, is in consideration of the overall economic impact that agriculture at PRNS and GGNRA has on Marin County's economy. While the DEIS discusses the impact of beef ranching and dairy production in PRNS and GGNRA as a percentage of beef ranching and dairy production in Marin County, it does not paint the full picture of the importance of beef and dairy production at PRNS and GGNRA to the overall economic health of Marin County. As we stated in our scoping comments, beef and dairy production at PRNS and GGNRA account for nearly 20% of the agricultural production of Marin County.<sup>23\*</sup> Alternatives D, E, and F, then, would deprive the highly-agriculturally-productive County of 1/5 of its agricultural economy, which would be economically devastating for Marin County and would have significant economic impacts in neighboring areas, such as Sonoma County. CONCLUSION CCA, CFBF, PLC, and NCBA appreciate the opportunity to review the DEIS and suggest improvements prior to the finalization of the EIS/GMPA. Our organizations favor the NPS finalizing Alternative B of the DEIS in its final EIS/GMPA, though we urge NPS to (1) adopt significant amendments to the Alternative's elk management provisions to ensure that Tule elk are kept off of ranchlands and (2) improve diversification opportunities to ensure that agriculture at PRNS and GGNRA remain viable.

Footnotes: 1 Peter Fimrite, Conservationists Upset as Much of Point Reyes Elk Herd Dies, SF GATE (San Francisco), April 19, 2015. 2 The DEIS itself seems to recognize this fact, acknowledging in its analysis of Alternative A (the "No Action" alternative) that "Under alternative A, the elk population would continue to grow ... at some point, population management would be necessary, and NPS would need to undertake a separate planning process to determine how to manage elk at Point Reyes." NATIONAL PARK SERVICE, GENERAL MANAGEMENT PLAN AMENDMENT AND DRAFT ENVIRONMENTAL IMPACT STATEMENT FOR THE POINT REYES NATIONAL SEASHORE AND NORTH DISTRICT OF GOLDEN GATE NATIONAL RECREATION AREA 24 (2019) [hereinafter "DEIS"]. 3 Letter from Dave Daley, President, California Cattlemen's Association; Dave Eliason, President, Public Lands Council; and Craig Uden, President, National Cattlemen's Beef Association to Cynthia MacLeod, Acting Superintendent, Point Reyes National Seashore (Nov. 16, 2017). 4 Letter from Dave Daley, President, California Cattlemen's Association; Jamie Johannsson, President, California Farm Bureau Federation; Kevin Kester, President, National Cattlemen's Beef Association; Bob Skinner, President, Public Lands Council; and Lucas Deniz, President, Western United Dairymen to Cicely Muldoon, Superintendent, Point Reyes National Seashore (Nov. 30, 2018). 5 DEIS at 40 (emphasis added). 6 Id. at 41. 7 Id. at app. A, figs. 2 and 3. 8 Id. (emphasis added). 9 Id. 10 The DEIS itself appears to acknowledge that Alternative B essentially maintains the status quo regarding Limantour Herd management, stating that "Management of the Limantour herd would be minimal and would focus on limiting the geographic extent of the herd to reduce their presence on leased ranch lands in Point Reyes, which would not result in a change from existing conditions." Id. at 163 (emphasis added). 11 DEIS at 62. 12 Id. at 63. 13 Id. 14 Id. at 40. 15 Id. at 40. 16 Id. At 41. 17 Id. 18 Id. at 3. 19 Jd 20Coastal Zone Management Act of 1972, 16 U.S.C. § 1456(c)(1)(A). 21 Marin Local Coastal Plan Unit II-Amended, 56-57 (1981). 22 The only references to the Coastal Zone Management Act are at pages ix-x and 195 of the DEIS, which merely state that NPS "had discussions" with the California Coastal Commission regarding federal consistency, but fail to provide consistency analyses. 23 Ana Guth, Comments Out Early on Park GMP A, POINT REYES LIGHT (March 1, 2018) ( quoting Marin County Board of Supervisors comments).

#7551

Name: Caufield, Catherine

Correspondence: I would like to offer the following comments on the Point Reyes National Seashore General Management Plan Amendment Draft Environmental Impact Statement. The DEIS has a number of inadequacies that apply to all the alternatives analyzed. 1. It does not have a budget or financial overview that outlines how any of the alternatives and actions will be implemented and paid for. It fails to state the amount or portion of its budget that goes to ranching-related expenses. Even at the current level of ranching, oversight (monitoring for lease compliance and environmental damage), assistance (such as killing wildlife to protect ranching operations) and mitigation (of negative impacts of cattle on sensitive habitats) place significant demands on the park budget. Expanding agriculture in the Park will only increase these costs and this must be reported and analyzed. The economic costs of existing agricultural operations and of the proposed expansion of those operations must be quantified. 2. It proposes a succession policy that is radically different from the original intentions of the public planning process, which emphasized multi-generational beef and dairy ranching. Originally, the ranchers who sold their land to the Park were allowed to lease it back at a discounted rate and to continue ranching it for 25 years or their lifetime. Later, this was extended to their offspring. Now it is proposed that leases be offered to other relatives, then to neighbors, and if there are no takers, to anyone who wants to lease land in the park even if they have no prior connection to the Seashore. 3. It proposes sweeping changes to the zoning of the Park, including expanding the area where agriculture is allowed and reducing the environmentally protected area, but it fails to consider the impacts on the Park as a whole of these zoning changes. It also proposes new trails, visitor accommodations, and other amenities without cumulative analysis of existing park facilities. Overall, the DEIS does not consider the impacts that the changes it proposes in the Amendment area will have on adjacent wilderness areas. 4. It fails to properly analyze the cumulative impacts of the proposed changes. Although it does consider a limited number of cumulative impacts, it does not, as it should do, consider past actions that are cumulative in nature such as expanded parking and increased visitation, transportation changes, new visitor serving facilities, and trail additions and enhancements. 5. It attempts to update a forty year-old GMP, without taking into account the full impact of the changes it proposes on the Park as a whole and without taking into account changes that have occurred since the Plan was adopted, such as the 2006 update of the NPS Management Policies. 6. The DEIS suffers from the fact that the PRNS does not have the wilderness plan required by policy and law. Such a plan would require additional data and baselines studies to ensure that its wilderness areas are managed to maintain wilderness character, as required by law. Without a wilderness plan and baseline information, it is impossible to identify indirect and direct impacts on wilderness values. 7. It does not address the issue of whether commercial diversification conflicts with the NPS Concession Act and fails to state what authority would be used to enact diversification activities, such as overnight accommodations operated by the leasee. Through concession contracts or commercial use authorizations, selected in a competitive public process, the National Park Service can authorize commercial visitor services that are determined to be "necessary and appropriate for public use and enjoyment." However, it is required that "concession operations ... be consistent to the highest practicable degree with the preservation and conservation of resources and values of the park unit." The DEIS does not analyze the consistency of its proposals with the NPS Concession Act. 8. It fails to address the impact of its proposals on climate change. Cattle are the leading source of greenhouse gases at the Seashore. Methane, produced by cattle, is a greenhouse gas with a much higher impact than carbon dioxide. There is no discussion of mitigation for cattle's impacts to the climate in any of the NPS's ranching alternatives. 9. The EIS says that the Seashore's land, water and wildlife would benefit were ranching to "cease, however it offers no plan for protecting wildlife from the impacts of ranching or for mitigating habitat loss from grazing or from growing crops. Other than killing Tule elk, there is no discussion of avoiding wildlife conflicts. The preferred alternative, Alternative B, is fatally flawed and should not be adopted for the following reasons: 1. In prioritizing the expansion and diversification of agriculture in the Park, without adequately reporting on and analyzing the impact such expansion and diversification would have on Park natural resources, it ignores a key provision of the Seashore's original enabling legislation, which requires that the Park be administered for "the maximum protection, restoration, and preservation of the natural environment." 2. In proposing a significant expansion of the types of agriculture and agriculture-related commercial activities allowed in the Park, it goes beyond the directive of the former Secretary of Interior, which was to extend leases to dairy and cattle ranches to 20 year terms. The diversification described in the Preferred Alternative B is a movement away from the historic beef and dairy ranching that is stated as a cultural and historic value in the Seashore. It also carries risks to natural systems and to public access and enjoyment of the Seashore. Although a modicum of diversification might be compatible with the Park's goal of natural resource protection, it should be small-scale and limited to the ranch core. Certainly it is unacceptable to allow new uses in the Ranchland zone based on 3. the economic interests of private

businesses. It is important to note that ranchers in the Seashore already have a competitive advantage over ranches outside the park. Seashore ranchers benefit from discounted grazing fees, below-market-rate housing, and maintenance and improvements to roads, homes, and farm buildings covered at public expense. Seashore ranches pay no property taxes. 4. Because cattle are the seashore's primary source of greenhouse gases, Alternative B (along with several of the other alternatives) is inconsistent with the Park's "Climate Friendly Parks" plan. 5. The new Ranching Operations Agreements will need oversight, but there provides no evidence that the Park has the resources to properly implement such programs. 6. It proposes types of agriculture (row crops, orchards and grain production) that have no historic or cultural connection with the Park and that depend on the use of rodenticides, pesticides and high water use. These inputs are incompatible with NPS policy and values and their impacts are not considered in the DEIS. 7. The new agricultural uses it proposes will result in changes to ranch cores and historic pastures that will damage the scenic and historic values of the Seashore. 8. Its proposal to allow ranch guard dogs would have a significant negative effect on the visitor experience. These dogs are quite aggressive by nature and should not be allowed free range in the Park. The need for dog-fencing will also limit public access and add visual impairments to park landscapes and cultural landscapes. 9. It fails to analyze the impact of actions that may be required to protect commercial ranchers' interests. In particular, sheep, goats, and chickens are likely to provoke conflicts with many forms of native wildlife, from mountain lions through raccoons to eagles and large hawks. There is no discussion of how these conflicts will be management, apart from the killing of Tule Elk. 10. All long-term strategies to manage the Tule Elk populations should be in the context of NPS policy and law as are other natural resources within the Seashore and not for the benefit of commercial lease holders. Additional research and data are needed to determine what the carrying capacity of the Park is and how best to manage elk populations and to understand the impacts of ranching operations on tule elk by ranching operations, as well as their impact on ranching. 11. The proposal to increase "boat-in" campgrounds would have environmental consequences that are not considered in the DEIS. This is especially important given that PRNS already has a significant challenge with the management of camping on Tamales Bay, particularly with issues of human waste disposal, camper misbehavior, and the protection of archeological sites. Expanding camping to Drake's Estero, a wilderness area, is not justified. To summarize, Point Reyes National Seashore must be managed for "maximum protection, restoration, and preservation of the natural environment." There is no mandate for prioritizing commercial agricultural leases over natural resource protection and visitor experience on these public lands. Cattle ranching should only be allowed if it is consistent with preserving the natural environment and the onus of accommodation should be on agriculture, not on wildlife and other natural resources. Moreover, there is no good argument for expanding the types of agricultural activities allowed in the Park. The No Ranching alternative is the only one in the DEIS that adequately prioritizes "maximum protection, restoration, and preservation of the natural environment." If ranching is to continue at a level compatible with the wildlife and other resources of the Park and in a way that maximizes the visitor experience, a new alternative is needed and it must be supported by the documentation and analysis so bad missing in this DEIS. Thank you for the opportunity to comment on this ve1y inadequate and disappointing DEIS. Sincerely,

#7552

Name: Hampton, Sharon

Correspondence: Have you folks studied the elk problems that plagued Yellowstone until the reintroduction of wolves brought about a balanced ecosystem? I am not suggesting that wolves or grizzly bears be re-introduced, but I am sure you are aware that the elk herds will likely grow quite enormous before running out of food and water without a major predator(s) or disease infecting the elk. In the meantime the plants will be heavily browsed. Sooner or later human culling will be called for. Or the entire park could be inundated with these large animals. I did not see a discussion of these realities. Many people seem to think that culling can be avoided. Humans become the top predator in the absence of wolves, unless coyote packs can take down an elk. Is that possible? Of course, those coyotes could also prey on children or some adults. Would have liked a discussion on this whole issue in the shortened version of this plan. I think the dairy farms, that concentrate so much manure, should be removed to help ensure some reasonable water quality. I am not sure that several thousand beef cattle should be grazing there, but people more familiar with the ecology of the area can address numbers. I come closest to option E, with the

realization that just allowing elk numbers to climb to the moon is likely to cause a crash somewhere in the future. Humans hiking through large numbers of large animals may become unsafe. Turning PRNS into a second Slide Ranch is not a good idea. Although not a wilderness, PRNS should be kept as wild as possible. Small animals will attract predators, of course. I am not against the Historic Ranches and favor their preservation. I was born in San Francisco and remember the battle to get the ranchers to let a national park into existence. And I visited the site of the Sweet Lumber Mill logging operation on Inverness Ridge. I photographed it and wrote a term paper about it for Civics in my senior year at Washington High School in San Francisco. The ranchers had to give up a lot for the Park to come into existence, so I think the grazing operations should continue for the Historic Ranches on a 20-year lease basis. I value the presence of near-by cattle herds to provide grass-fed beef to our local stores. I don't know where the animals are slaughtered, but I hope the transport is not extensive. Keep the carbon footprint as low as possible. Thank you for the opportunity to comment.

#7553

Name: Hoffman, Walter

Correspondence: Make the point wild- no cows, row crops, vegetable stands, ranches, wire, development etc. what would John Muir think and say to all that. Point Reyes National Park - Doesn't sound like a suburbia, casinos, neon lights or race tracks. No, it sounds like hiking trails, tent camping, ranger led field trips to Sculpture beach, Double point, bass hike, sky camp, pierce point, White Gulch, etc. Get my point- Nature of every kind, lets go people and wild!

#7554

Name: Hoffman, Walter

Correspondence: Well, here we go again! How many times must we say it- wilderness, wilderness, wilderness- to watch the elk + bears play freely on highway one. To see the Bald Eagle fly overhead to what we're seeing now in Bolinas. Weasels, Mountain Beaver, Coyote, cougar, bush rabbit, skunk, coon, fox- there are here except maybe the bear now and again, but soon to be a regular. Lets get with it folks and set them free!

#7555

Name: Hoffman, Walter

Correspondence: Lets get back to wild! We need large open spaces for wilderness and how else to have a National Park then to let the wildlife run free throughout the parklands and beyond. Forget the pollution from Bovines and possibly pigs, sheet, goats etc. Let it be free and wild like any good National Park should be.

#7556

Name: Kolbe, Caroly

Correspondence: Dear superintendent, I am very opposed to any killing of tule elk and I support Center for Biological Diversity and their position. Please don't allow this new program (proposed) to go forward! I will continue to fight to help the elk and resist any further changes!

#7557

Name: Militzer-Kopperl, Jennifer

Correspondence: This is Jennifer Militzer-Kopperl, wife of award-winning amateur photographer Ben Kopperl, writing about our concern about Environmental Impact Statement (EIS) regarding ranching and tule elk management in the agricultural lease/permit areas of the park. Ben likes to go to Point Reyes to take pictures such as the one in figure 1. (photo) Figure 1: Honorable Mention Outdoor California photo contest issue March/April 2019 vol 80 #2 (22-23) Ben does not want to go to Point Reyes to take pictures such as the one in figure 2. (photo) Figure 2: Roadside Livestock Ranch

On Ben's last visit to Point Reyes on September 4, 2019, he took the disturbing picture shown in figure 3. Note the livestock in what is supposed to be clear water that is supposed to flow to the ocean. Note how the water is overgrown with algae from all the cow manure. I trust you do not need a full environmental impact review to detail why the algae bloom is happening or why it is bad. I find it self-evident. I hope you do, too. (photo) Figure 3: Livestock in Algae-Infested Water in Point Reyes Kindly get the livestock out of our parks. Kindly protect the tule elk herd. Kindly protect our ocean.

#7558

Name: Machung, Anne

Correspondence: Dear Superintendent Muldoon, I am writing to provide comment, as requested, on the Point Reyes GMP Amendment EIS. First of all, I want you to know how much I love Point Reyes National Seashore. I have walked and hiked every one of the trails there for over 40 years. It is one of my favorite parks in the National Park system; indeed it is a national treasure. One of my favorite trails - one I hike multiple times every year - is the path that leads from the historic Pierce Point ranch out to Pierce Point and back. Not only is the scenery- the ocean, the beaches and the wildflowers - - spectacular, but the Tule Elk one often sees out there are incomparable in their grace and beauty. It is only at Point Reyes National Seashore that one can see, and appreciate, such spectacular animals. Over the years, I have met literally hundreds of people who have come to that relatively remote spot, even on cold and windy and rainy days, precisely to see the elk. For that reason, and others as well, I am very distressed by the National Seashore's General Management Plan Amendment Draft Environmental Impact Statement (GMPA) which clearly favors ranching and agricultural interests over the protection and preservation of wildlife, natural ecosystems, and public lands. The mission of the national park system is to protect native plants and animals both for their own sake and for the enjoyment of the public, including generations to come. It is not to protect cows, ranching and industrial agriculture. Yet five of the six alternatives the GMPA proposes allow dairy or beef farming to continue at Point Reyes National Seashore for the next 20 years. Several of the alternatives even allow the ranchers - who in 1962 were paid the equivalent of \$340 million in today's dollars for their ranches -not only to continue grazing on public lands, at public expense - but to actually expand their operations to include pigs, goats, sheep, chickens, row crops and even "home stays" for visitors, as if visitors come to the park to see chickens and cows! This is outrageous. It represents an extraordinary misuse and misappropriation of public lands, public places and public funds for private gain. The incremental, long term and cumulative impacts of ranching are well documented, and I am sure you are aware of those: the destruction of native plants and animals, degradation of their habitats, introduction of invasive plants, and loss of endangered species. At Point Reyes National Seashore, manure runoff has contaminated waterways where coho salmon spawn and elephant seals raise their young and the heart of the Seashore -once a rare coastal prairie ecosystem -has been transformed by 6,000 cows into a dairy farm (or, more accurately, into 24 dairy farms). Ranchers claim that the Tule Elk - the pride and joy of hundreds and thousands of visitors to the park-are "the problem" because they compete with cattle for food and water. Yet consider the following: • There are less than 600 Tule Elk at Point Reyes compared to about 6,000 cows. • The average size of a Tule Elk is about 300-500 pounds; the average cow weighs about 1,400 pounds. • Cows eat an average of 50 pounds of forage a day; Tule Elk eat an average of 9 pounds a day. • At Point Reyes National Seashore, the almost 6,000 cattle produce over 133 million pounds of manure annually, making some of the waterways within this national seashore some of the most polluted within the state of California. • And they are the highest emitter of noxious greenhouse gas emissions in the park since cows burp methane, a greenhouse gas that is 25-100 times more potent than carbon dioxide. Yet, there is no discussion of mitigation for cattle's impacts to the climate in any of the NPS' s ranching alternatives -and this at a time when the United Nations estimates the world has only 12 years left to reverse the accumulation of CO2 in the atmosphere before the effects of climate change become irreversible. Methinks the problem is not the elk but the cattle. For that, and many other reasons, I am asking the National Park Service to prohibit any further diversification of ranch operations at Point Reyes National Seashore, to phase out dairy and beef ranching there within the next five years, and to restore the park to its original intention, as established in 1962 by the U.S. Congress: "To save and preserve, for the purposes of public recreation, benefit and inspiration, a portion of the diminishing seashore of the United States that remains undeveloped." If we don't start now, when?? And if we don't act locally, where do we act??



#7559

Name: N/A, N/A

Correspondence: MISLEADING AD in HIGH COUNTRY NEWS The ad paints a picture of the elk in Pt Reyes as being exterminated as one of the solutions to the General Management Plan of the Seashore. 1. First there is no industrialized dairying or beef operations in the seashore but rather historic FAMILY farms. 2. The elk herd has 432 elk in one group and 120 and 170 in the other 2 herds. The elk are 80% inbred and the Seashore has had NO management plan in place. 3. ONE of the six alternatives in the plan calls for the extermination or removal of the elk. The elk were extirpated from the land since 1860. 4. The Seashore has developed comprehensive management plans for the ranches within its boundaries. 5. The ranches identified in the Management plan are all part of the pastoral zone which is an integral part of the enabling legislation for the establishment of the Seashore. This ad appeared in High Country News September 16, 2019 and was paid for by the Resource Renewal Institute of Mill Valley, California THIS LETTER WAS SENT ALSO TO THE HIGH COUNTRY NEWS FOR CORRECTION ON THE MISINFORMATION

[attached is the original ad references in the comment]

#7560

Name: McDonald, Mervin

Correspondence: September 23, 2019

Superintendent Cicely Muldoon 1 Bear Valley Road Point Reyes Station, California 94956 Dear Superintendent Muldoon:

We are a family of 5 generation ranchers in Marin County. We are currently 3 generations ranching in Point Reyes National Seashore. We lease and raise beef cattle on the beautiful N and Home Ranches. We value our working ranches which provide an opportunity for the public to learn about where and how their food is produced.

The McDonald Lucchesi family appreciates the opportunity to comment on the PRNS and GGRNA draft Environmental Impact Statement for the General Management Plan Amendment.

Home Ranch Core and Residential Use Requirement When the Home Ranch permittee went out of business in 2003, NPS took the core (20 acres) out of the middle of the ranch and permitted it as residential use. The rest of the Home Ranch (2660 acres) was permitted as an Ag permit. The permit on the residence has ended. A ranch cannot be operated without a core.

PRNS has mentioned that they plan to make employee housing in one of the houses in the core. We strongly object to this idea. There are no other seashore ranches with park housing on it. Just for safety alone, the idea is bad. The way this ranch is designed, the cattle have to run through the core to get to the con-als. We can't have park employee's children, pets, and cars in the yard when we bring cows and bulls through the core. We predict we will need ranch housing in the not too distant future. Housing for anyone other than ranch workers would not be feasible. PRNS must include the core of the ranch back into the Ag permit to make Home Ranch whole again as it was before it was split out for a residential permit. Our current lease has "incidental residential use" but the draft lease/special use permit 4.1 states "For leases where residential use is authorized, Lessee agrees to use Premises as the principle residence " We believe there should be flexibility in the principle residence requirement, and it should be determined on a case-by-case basis. In our case, the ranch house that we use for incidental residential use is not suitable for a permanent residence. We believe that our lease should continue to allow for incidental residential use and would like to meet to discuss the residential use issue before the Final EIS and the Record of Decision is issued.

We support creating a loop trail around the Home Ranch core. It is much too dangerous to have visitors walking directly through the ranch core when we are working cattle. We had a close call just this summer - we brought a

herd of cows down through the core and were just shutting them into the corral when two people and an infant came walking through. It scared them and us! If they had been just 3 minutes sooner, who knows what would have happened. The ridge above the ranch core would be a perfect spot for a trail. From up there on the ridge, you can look down on the ranch complex and see the ranch activity. This trail would bring them back to the Estero parking lot. Elk Missing in the DEIS is any analysis or plan to control the movement of the Limantour herd onto the ranch lands. The migration of this herd out of the designated elk range and on to ranch lands is already causing significant harm to us. These impacts have increased over the last few years and are well documented. The DEIS has not fully analyzed these impacts or considered the likely increase in elk migration onto ranch lands in the near future. Because this would simply be an expansion of the Limantour herd that is already causing problems, and not the establishment of a new herd, the NPS would have no direction or responsibility to control further proliferation. This omission would very likely result in devastating consequences. This EIS must analyze the impacts of all the elk on the ranch lands and direct management responsibilities for NPS to control population and reduce elk impacts of all elk in the entire planning area, not just the Drakes Beach herd. NPS needs to follow the existing 1998 elk management plan to manage for separation from ranch lands. The 1998 elk plan stated the "area chosen for the Limantour herd" would be restricted by "buffers from major highways, ranches, and lands outside the Seashore." 1998 Elk Plan p.46. There was no intent to expand the Limantour herd on to ranch land. In fact, this Draft EIS for the GMP Amendment confirms that the elk were to be separated from the ranch lands. The Draft EIS states, "the 1998 Tule Elk Management Plan/EA did not contemplate the expansion of elk into the ranchlands." DEIS p. 5. By not removing the elk from Home Ranch and relocating the elk back into their intended area in the wilderness, our business will be in jeopardy of going out of business. The elk are competing with our cattle for forage despite the NPS model results that conclude the elk do not affect forage available or the RDM. If in fact NPS believes the elk do not affect forage availability, then our lease should not have a provision that we will lose AUMs or have a more restricted RDM because of elk. Actually the elk decision is very simple. Do you want elk OR Historic ranches to remain on the ranch lands in the limited area of Point Reyes Peninsula Dairy Ranches Historic District? We do not object to elk elsewhere on the Seashore but clearly, sustainable historic ranching and elk cannot coexist if the elk are not managed for effective separation. Elk must be managed for effective separation by (1) identifying the specific area (range) to which the elk will be limited under the preferred alternative, (2) setting the maximum number of elk the herd will be allowed to grow to on that range, and (3) adopting management actions required if the elk are found outside the range or the herd exceeds the established size limit.

First, there is no map of the elk range that will be established under the preferred alternative. The Final EIS and Record of Decision should include a map of the area where the herd will be located in the preferred alternative, like the proposed elk range map on page 48 of the 1998 Elk Plan. The DEIS includes Appendix Page A-2 showing the "Existing Range of Tule Elk in the Planning Area." However, there is no map of where elk will be permitted in the preferred alternative. Second, the area where elk will be allowed to range in the preferred alternative must exclude historic ranch land in the Point Reyes Peninsula Dairy Ranches Historic District and the Limantour herd should be limited to the Phillip Burton Wilderness. Third, the Final EIS and Record of Decision should set a limit on the size of the Limantour elk herd. If the decision only includes a map of where the elk range is located without including a herd size limit, the population can expand outside or within that area causing resource conflicts and damage. The public, the ranchers, and NPS should know what the established capacity size limit is for the number of elk in the Limantour herd. Fourth, the Final EIS and Record of Decision should include required and effective management actions to remove elk that go beyond the boundaries of the preferred alternative elk range and to reduce the size of the elk herd if it exceeds the herd size limit. Finally, we strongly recommend a fence to effectively separate the Limantour herd from the Historic District ranch lands. The fence should terminate on the Inverness Ridge at a wooded area, in dense vegetation, or at a significant dropoff on the ridge which elk already avoid. Zoning The outdated zoning maps in this DEIS have not been analyzed. We appreciate "NPS would make on-the-ground field verification and determinations based on activity regarding slope to further delineate the Range subzone." Agriculture Advisory Committee Because of the history of the inconsistency of NPS Range Managers, an Ag Advisory Committee needs to be analyzed and created. This Ag Advisory Committee should include a member from each: The USDA Natural Resource Conservation Service, The Marin County Resource Conservation Service, The Marin County Agricultural Commissioner, The University of California Cooperative Extension, Marin Agricultural Land Trust, Marin County Farm Bureau, a PRNS dairy rancher and a PRNS beef rancher. This committee should be utilized by PRNS decision makers whenever there is a question or decision

regarding the agricultural activities or other agricultural issue in the planning area. The benefits of an Ag Advisory Committee would be: improved relationship and trust between parties, informed decisions about agricultural activities by individuals with experience in agriculture, reduced concerns about how much agricultural experience the PRNS and the National Park Service has, informed decisions about agricultural activities 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, increased continuity, as members of the committee will have less turnover than PRNS staff, increased community involvement with the future of food production in the planning area, and reinforced public commitment to continue viable agriculture in the planning area in perpetuity.

Leases If this DEIS is going to use a formula for fair market value to determine rental rates, then NPS needs to take on the responsibilities as a fair market value lessor such as prompt building maintenance and repair and more flexible and varied ranching practices on the land. A 20 years lease with annual rent adjustments means nothing more than a one-year lease. The ranchers will have a 20-year Possessory Use tax with only one-year stability. Given this uncertainty we may be interested in a shorter lease such as a 10-year lease. Nothing is mentioned in this DEIS about what happens to the ranches after 20 years. At that time will a new Management Plan need to take place? This issue needs to be made clear. This DEIS needs to make clear what the regulations of the maintenance reserve account is. Whose name is this account in? Is it individual accounts, or a PRNS ranching account? Does it consist entirely from a portion of rental proceeds? At this time, most of our ranch buildings are not in our permit. They are falling apart. PRNS must get them to a certain standard before they can expect us to maintain them. It is not fair for us to bear the cost of years of Park Service maintenance neglect and the Park Service should have the financial responsibility to bring the infrastructure up to useable and safe condition.

Foundation Document Finally, the Draft "Foundation Document" must be revised to recognize the existence and importance of ranching as part of PRNS. The draft Foundation Document will provide basic guidance for planning and management decisions. The draft Foundation Document is significantly deficient because it mostly fails to recognize historic and culturally important dairy and ranching. The Document contains several sections including Park Purpose, Park Significance, and Fundamental Resources and Values. All of these sections should be revised to recognize that the ranches can help to perpetuate the coastal grassland ecosystem, increase environmental awareness, promote the ethic of land stewardship and sustainable agriculture, support the local foodshed, and continue to favorably influence regional trends in the way food is produced, distributed, and consumed. To save space and avoid repetition, we incorporate by reference and support the points in the comment letter submitted by Point Reyes Seashore Ranchers Association and the letter submitted by PRNS and GGNRA Family Ranchers.

#7561

Name: Baty, Tom

Correspondence: To Whom It May Concern:

We appreciate the opportunity to comment on the Draft Point Reyes GMP Amendment (DGMPA). The National Seashore (PRNS) and North District of Golden Gate National Recreation Area (GGNRA) are truly two of America's treasures.

In general, the Public Lands Conservancy (PLC) is not against continuation of historic dairy and beef ranching by the families that sold their land to the PRNS and GGNRA. However, the DGMPA preferred alternative outlines a concerning future for the National Park Service (NPS) by emphasizing commercial interests over protecting other values such as water quality, air quality, wildlife, traditional recreation activities, and visitor experience. The preferred alternative for the DGMPA fails to balance the National Park Service environmental values with the proposed continuance of agriculture within the Park. In addition, the preferred alternative, Alternative B fundamentally ignores a key tenet of the Seashore's original enabling legislation.

The Point Reyes National Seashore legislation provides, in pertinent part, as follows: § 459c-6. Administration of property (a) Protection, restoration, and preservation of natural environment Except as otherwise provided in sections 459c to 459c-7, ... the property shall be administered by the Secretary without impairment of its natural values, in a manner which provides for such recreational, educational, historic preservation, interpretation, and scientific research opportunities as are consistent with the maximum protection, restoration, and preservation of the natural environment within the area, subject to the provisions of sections 1, 2, 3, and 4 of this title ... and in accordance with other laws of general application relating to the national park system as defined by sections 1b and 1d of this title ...5

The Preferred Alternative also inaccurately conflates the Secretary of Interior Ken Salazar's directive to extend the ranch leases to essentially expand the agricultural footprint in the Park

It's important to note that the former Secretary of Interior stated very specifically that his directive to extend the ranch leases only authorized cattle and dairy ranches to have new longer leases:

"I direct that the Superintendent work with the operators of the cattle and dairy ranches within the pastoral zone to reaffirm my intention that, consistent with applicable laws and planning processes, recognition of the role of ranching be maintained to pursue extending permits to 20- year terms for the dairy and cattle ranches within the pastoral zone. "

In turn, in his Delegation of Authority, former NPS Director Jonathan Jarvis again only authorized cattle and beef and dairy operations,

"the issuance of lease/permits for the purpose of grazing cattle and operating beef and dairy ranches, along with associated residential uses by the lessees and their immediate families and their employees, and their employees' immediate families, within the pastoral zone of Point Reyes National Seashore and the northern District of Golden Gate National Recreation Area 2 administered by Point Reyes National Seashore. Under this delegation, you may issue lease/permits with terms of up to twenty years. These long-term lease/permits will provide greater certainty for the ranches operating within the national park's pastoral zone and demonstrate the support of the National Park Service (NPS) and the Department of the Interior for the continued presence of dairy and beef ranching operations. (emphasis added) "

Fundamentally the park's preferred Alternative B inadequately addresses the intent of NPS and park enabling legislation, NPS policy, practical considerations, and significant negative impacts of expanded agriculture. Also, we do not believe NPS has the capacity to administer the oversight program developed in Alternative B. Our specific comments follow:

1. As stated in 54 U.S.C. § 100502, general management plans for the preservation and use of each System unit, including areas within the national capital area, shall be prepared and revised in a timely manner by the Director. On January 1 of each year, the Secretary shall submit to Congress a list indicating the current status of completion or revision of general management plans for each System unit. General management plans for each System unit shall include- (1) measures for the preservation of the area's resources; (2) indications of types and general intensities of development (including visitor circulation and transportation patterns, systems, and modes) associated with public enjoyment and use of the area, including general locations, timing of implementation, and anticipated costs; (3) identification of and implementation commitments for visitor carrying capacities for all areas of the System unit; and (4) indications of potential modifications to the external boundaries of the System unit, and the reasons for the modifications.

With this statute in mind, we believe the DGMPA has segmented the requirement to develop a timely, updated, and comprehensive GMP. Segmentation occurs when an action is broken down into small parts in order to avoid the appearance of the significance of the total action. An action can be too narrowly defined, minimizing potential impacts in an effort to avoid a higher level of impacts. Because the 1980 Point Reyes General Management Plan (GMP) is almost 40 years old (and required by law to be updated), amending this outdated document by focusing

only on the new Ranchland Zone has the potential to reduce and exclude potential impacts and mislead the public. For example, the DGMPA alters other zoning areas and increases the ranchland portion and decreasing environmental protection zones of the GMP designated in the two parks; however, it does not fully evaluate the impacts to these other park areas. And the GMPA is proposing new trails, visitor accommodations, and other amenities without cumulative analysis of existing park facilities. In addition, the DGMPA is deficient because the 1980 GMP overall environmental analysis and guidance in law and policy has not been updated as required by legislation. For example, visitation, facilities such as parking, historic features, special status species numbers, and abundance, and water quality standards have all dramatically changed since 1980. In turn, the 1980 GMP did not consider NPS Management Policies that were significantly updated in 2006. Because of these issues, the public cannot fully understand what changes are being made to the 1980 GMP because a complete document with changes has not been produced. A full GMP process 3 would be required to fully understand management direction and the impacts of cumulative actions for the two park areas. Finally, it is not clear which document the NPS is amending the joint OONA/Point Reyes Plan/Assessment (1980) or the standalone 1980 Point Reyes OMP. The documents are substantially different.

2. The PRNS does not have a wilderness plan as required by policy and law. However, much of the DGMPA planning area is adjacent to the parks designated wilderness and will have direct, indirect, and cumulative impacts on wilderness values. We believe additional data and baselines studies need to be completed to ensure the Philip Burton Wilderness is managed to maintain its wilderness character, as required by law. At present, lack of a wilderness plan and baseline information makes characterization of indirect and direct impacts on wilderness values impossible. The DGMPA dismisses wilderness as a topic; however, ranching activities have documented water quality and sedimentation issues from ranching activities that impact Drakes Estero, part of the wilderness area. In addition, natural viewsheds are impacted by ranching activities and the park's tule elk population utilizes designated wilderness areas.

3. The Seashore's proposed policy for managing rancher succession will determine who will take over a ranch lease once it has expired or if the primary lease holder is no longer able to ranch or has passed away. Changes made during the initiation of a new lease would be considered a federal action, and would be subject to additional NEPA documentation. We recommend the policy be rewritten to include that a first step would be to complete a site analysis of the area to be leased. This first step would include (but not be limited to) a detailed analysis of cultural, recreational, and natural values that must be protected by law and NPS policy. From that analysis, the NPS may and should remove certain lands from leasing to protect a cultural, recreational, or natural feature such as an archeologic site, a special status species, or for a recreational asset (e.g., critical grassland/brush habitat or trailhead improvements). The analysis would also identify whether grazing systems must be altered to preserve natural resources or a cultural values. In turn, as written, the Seashore's draft proposed policy again strays away from the policy that emphasize multi-generational beef and dairy ranching. Rather, the proposed policy creates a new opportunity for any individual (an individual from outside the Ranchland Zone) to apply to take over a lease through an open Request for Proposals that would continue ranching activities. In keeping with the original intentions of the public planning process, continuation of ranching should focus on the cultural and historical significance of multi-generational beef and dairy ranching.

4. We believe diversification as described in the Preferred Alternative Bis a movement away from the historic beef and dairy ranching that is stated as a cultural and historic value in the Seashore. The inclusion of diversification in the Alternative B represents an unwarranted expansion of the agriculture and the intrinsic risks to both natural systems and public access and enjoyment of the Seashore. Agricultural diversification would introduce a new range of agricultural activities, like grazing sheep, goats, keeping pigs, developing row crops, and farm stays and farm stands throughout the Ranchland zone. Diversification activities should be limited to the ranch core and small in scale. The DGMPA goes far beyond established families' continued beef and dairy ranching by allowing new uses in the Ranchland zone based on economic considerations for private businesses.

As potential types of agricultural diversification, row crops (as well as orchards and grain production) present another set of practical considerations that are seemingly incompatible with NPS policy and values. Agricultural applications of rodenticides and pesticides, even those approved for use in organic farming, should not be

permitted within the Seashore as they kill far more than the targeted "pest" species. Park policy on the potential widespread agricultural use of rodenticides and pesticides needs to be clearly presented in the GMPA.

We believe if diversification is pursued additional site-specific NEPA will be required.

5. Finally, impacts not analyzed by the DGMPA includes future conflicts with other Seashore wildlife to protect commercial rancher interests. In the future, if sheep, goats, and chickens are added to the pastoral zones, there will be significant wildlife conflicts. The analysis of the additional diversification is basically non-existent for many of the potential diversification items proposed. Small animal husbandry would obviously increase conflicts with virtually all predators, from mountain lions through raccoons as well as eagles and large hawks. Depredation permits are not permitted in the Seashore and this policy needs to be clearly addressed in the planning process. Even so-called nonlethal predator controls such as dogs (which are very often quite lethal to mesa-predators) and elaborate fencing programs represent significant impacts to native fauna as well as park visitor experience and need to be considered in planning process if agricultural diversification is being considered. Ranch guard dogs are especially problematic because of potential visitor and wildlife conflicts and should be removed from the Preferred Alternative. Despite the referenced caveats in the proposal, the reality is that these guard dogs will present true risks to wildlife and human uses in the Park. These dogs are quite aggressive by nature and should not be allowed to free range in the Park. Anyone who doubts this claim should try to approach one of the dogs currently guarding chickens on the Rogers Ranch. When a park visitor is attacked by one of these animals will the Park share in the liability with the Park leaseholder? Background literature acknowledges that these dogs are roamers by nature and generally need to be constrained with their flocks. They bark incessantly and will routinely kill anything that seems to be disturbing their flocks. The need for dog-fencing (to attempt to contain flocks to allowed "pasturelands") will create yet another layer of limiting public access and visual impairments to park landscapes and cultural landscapes.

6. We are concerned about how cumulative impacts are addressed. The CEQ regulations (40 CFR §§ 1500 -1508) define the cumulative impacts and effects that must be addressed and considered by Federal agencies in satisfying the requirements of the NEPA process. This includes direct, indirect and cumulative impacts: Cumulative impact is the impact on the environment, which results from the incremental impact of the action when added to other past, present, and reasonably foreseeable future actions regardless of what agency (Federal or non-Federal) or person undertakes such other actions. Cumulative impacts can result from individually minor but collectively significant actions taking place over a period of time. (405 CFR § 1508.7). The DGMPA does attempt to consider a selective and limited number of cumulative impacts (page 99); however, because the document amends the 1980 GMP, it should consider past actions that are cumulative in nature such as (by not limited to) expanded parking (increases visitation), transportation changes, new visitor serving facilities, and trail additions and enhancements. The list of cumulative impacts from projects is too limited.

7. DGMPA is missing a budget and financial overview that outlines how any of the alternatives and actions will be implemented and paid for. The Seashore funding capability has been in decline. Without a proposed budget and anticipated costs, it is impossible for the public to understand how the Ranch Operating Agreements and the Preferred Alternative will be implemented. Without this information made available to the public there may be negative impacts to natural resources management, visitor services, and other vital existing park programs to protect the environment that have not been disclosed. As stated in 54 U.S.C. § 100502, general management plans for the preservation and use of each System unit, including areas within the national capital area, shall include "indications of types and general intensities of development (including visitor circulation and transportation patterns, systems, and modes) associated with public enjoyment and use of the area, including general locations, timing of implementation, and anticipated costs."

8. All long-term strategies to manage the elk populations should be in the context of NPS policy and law as are other natural resources within the Seashore and not for the benefit of commercial lease holders. Tule elk at Point Reyes should be managed in the context of the overall population level. We strongly believe the continuation of a managed Tule elk herd is important ecologically (restores natural process as directed in NPS Policies and park's legislation) and provides for enjoyment for park visitors. We support the retaining of the Drakes Beach and

Limantour Herds. The Final GMPA should fully address this issue by providing specific guidance for management to include additional research and data collection. This would inform the public of the potential impacts to ranching operations, and turn, impacts to tule elk by ranching operations. In addition, we do not believe the park has sufficient data to set a carrying capacity number at this time. The Final GMPA should protect and manage natural resources, including tule elk, with conservation of these resources as the highest priority, as mandated by the Seashore's mission and current NPS management policies. Long-term leases and overall management strategies should strive to reduce conflicts and find non-lethal management strategies to balance and accommodate the presence of elk and cattle. The park's legislation directs protection and restoration of the natural environment the highest priority for park management.

9. The FGMPA should clarify whether commercial "diversification" conflicts with the NPS Concession Act and what current authority would be used to enact diversification activities such as overnight accommodations operated by the lessee. We would assume the concession process for all visitor activities, such as farm stands and bed and breakfast facilities, would be authorized by the concessions program. Through the use of concession contracts or commercial use authorizations, the National Park Service can authorize commercial visitor services that are determined to be "necessary and appropriate for public use and enjoyment." However, "concession operations will be consistent to the highest practicable degree with the preservation and conservation of resources and values of the park unit." In addition, the selection of a concessioner is through a competitive public process.

10. As stated NPS policy and law requires superintendents to "identify visitor carrying capacities for managing public use. Superintendents will also identify ways to monitor for and address unacceptable impacts on park resources and visitor experiences. We applaud the effort in the DGMP (Appendix G) to identify a carrying capacity process. However, there is not information in the document on how the park will implement and fund this program. The FGMPA, as required by law, should provide an implementation schedule, public process for sharing results, and anticipated costs.

11. In general PLC supports increasing visitor access through the ranch leases as long as it is limited to trails (and trail improvements) and day use amenities such as parking, picnic areas and view pullouts. We are opposed to the expansion and/or introduction of camping facilities, particularly "boat-in" campgrounds presumably in Drakes Estero. PRNS already has a significant challenge with the management of camping on Tomales Bay, particularly with issues of human waste disposal, camper misbehavior, and the protection of archeological sites. The park currently does not have the resources to effectively manage the Tomales Bay sites and allowing camping on Drakes Estero would be nearly impossible given the intent of wilderness designation and what boats should or should not be permitted in the Estero. In turn, impacts could be unacceptable to harbor seals, eel grass, and other aspects of this marine wilderness estuary. Alternative B appears to incorrectly suggest the potential use of Schooner Landing and the Home Ranch as camping areas: if these areas are the old oyster company site or the non-grazed area in the Tree Farm, both of these sites are clearly designated outside the planning area and cannot be considered or evaluated here.

12. The preferred alternative lacks a thorough analysis of anthropogenic climate change effects. Climate change, as demonstrated in studies by USGS, will include sea level rise and inundation of proposed ranch lands; this cumulative action was not analyzed in the DGMP. In addition, predicted increased rainfall and drought events would significantly alter grazing regimes and native grassland communities. The document does report on the magnitude of carbon dioxide contributed by livestock under existing conditions but does not report on the additional contribution from diversified livestock. Scientists have documented projected and existing effects of anthropogenic climate change on resources at the parks (see Gonzalez et al. 2018). The omission of a climate change analyses hinders managers from adaptively managing parks to preserve and protect resources. We recommend that FGMPA needs to have a climate change impact topic that has a full analysis of the specific and cumulative effects.

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

#7562

Name: Lunny, N/A

Correspondence: Dear Superintendent Muldoon, The Lunny Ranch is a member of the Point Reyes Seashore Ranchers Association (PRSRA) and fully endorses the points made in the PRSRA DEIS Comment letter. Also, to save space and avoid repetition, we incorporate by reference and support the points in the longer and much more detailed DEIS Comment letter submitted by PRNS and GGNRA Family Ranchers. This letter is meant to focus more specifically on the Lunny Ranch (aka the Historic G Ranch).

During the Shafter era, the same time frame the new historic working landscape designation is meant to protect, the G Ranch, like other ranches on the Point Reyes Peninsula, was quite diversified. A dairy, many large barns for cattle and horses, a slaughterhouse to kill and process cattle, sheep and hogs, a cheese processing plant, pastures, hayfields, and worker housing all existed at the G Ranch. It is unknown whether row crops or field crops were raised on the G Ranch prior to World War II. As thousands of acres were under cultivation on the peninsula for artichokes, beans, peas and other vegetables, it is quite likely that these crops were grown at the G Ranch because most of the ranch is level with deep soil.

Post-World War II, with the availability of inexpensive shipping, the landscape at Point Reyes began to change. Ranchers realized that they did not need to depend on the local food system to make a living. More money could be made by concentrating all effort on the dairy, leaving traditional diversification behind. The local diversified farms turned into a non-diversified dairy monoculture - shipping feed in from distant locations and shipping milk to distant markets. This same transition to large scale, single commodity agriculture was happening all over the country. The Congress and the NPS created PRNS just after the conversion to a cow-only, mostly dairy monoculture.

At the time that the Lunny Ranch (G Ranch) was purchased by the federal government in the 1970s to include in the Pastoral Zone of PRNS, the Lunny family enjoyed hunting, fishing and water skiing (very occasionally) at Abbotts Lagoon and grazed cattle to the edge of the lagoon. The Lunny family also had an annual 4th of July party on the edge of the lagoon. The beef cows preferred calving in the clean sand in the sand dunes. We milked about 250 cows at our dairy and we still had a few pigs around from the time when every ranch had pigs. We could add any species of farm animal we wanted - for commercial sale of meat, for our own consumption or for additional management of invasive brush. We made decisions about stocking rates and stocking densities that would utilize available forage, but never overgrazed. We took excellent care of our pastures and rangelands because our future depended on it. When the Seashore was established, the Lunny Ranch had approximately 500 acres in crop production. We plowed, disked and planted barley, oats, vetch, beans and other forage crops and stored and fed the feed as silage. We had a makeshift runway where fixed wing aircraft and helicopters would land, load with fertilizer, and spread on the crop land. Much of the several thousand tons of silage produced annually on the Lunny Ranch was sold to neighboring dairies. During this time, if a building needed repair, we repaired it. If a waterline failed, we replaced it. If we needed a water trough in a new location, we put it there. And the natural resources were protected.

Ranching at PRNS is very different today. We are no longer allowed to hunt, we are not allowed to use the sand dunes or Abbotts Lagoon, we are not allowed to make our own decisions about stocking density or stocking rates, and we are now limited to 180 acres for crop production per year. In the draft EIS, NPS makes an attempt to allow ranchers to restore other livestock species grazing for our pastures and has also made an attempt to allow more row crop production. Unfortunately, the diversification activities would not be economically viable if the DEIS limitations on these activities are not revised. The DEIS states: "Diversification of ranching activities allows ranchers to react to poor forage production years and fluctuations in the economic market." Without the modifications proposed by the ranchers in PRNS and GGNRA, the diversification components of the DEIS would not meet the NPS goals.

It is our understanding that NPS policy does not require that activities in a cultural landscape present at the time of purchase be frozen in time, ignoring and/or disallowing the rich historical activities and/or the need to allow



modernization and change from that moment in time. We have been very pleased with the fact that the NPS has allowed significant changes, upgrades, construction and development to be undertaken over the years by the ranchers, which has allowed seashore ranches to better compete in commodity markets. Since the 1960's when PRNS was created, PRNS family farms generally strove to compete in a nationally price driven commodity-based agriculture, competing with large scale industrial agricultural operations.

The reality for the family farm has changed. Over the past decade or so, the U.S. is losing approximately 50 family farms per week and big industrial agriculture is getting bigger. Small family farms have realized that the secret to survival is to begin to move away from large scale single commodity monoculture and refocus on small scale diversified agriculture and local markets. The local marketing allows small farmers to build local relationships, and to collaborate with other ranchers on value added products processing and distribution. This "new" model is actually a restoration of the traditional diversified farms found on the Point Reyes peninsula during the Shafter era, not long before it became a unit of the NPS. We applaud the NPS for the attempt it has made in this DEIS to allow the restoration of these historic activities. With the modifications proposed by the ranchers in the planning area, these goals can be accomplished.

We appreciate that the PRNS initial proposal includes ranching with 20 year leases but are concerned that ranching may not remain viable because of the elk conflicts built into preferred alternative. The Lunny family still interprets the 1998 Elk Management Plan the same way that PRNS did in 2001 (see attached copy of PRNS document "A Year in Review"), only 3 years after the plan was completed. This contemporary understanding of the Elk Management Plan is certainly the correct interpretation. NPS more recently has not adhered to the 1998 Elk Management plan and the conflicts described in the current, 1998 Elk EA, while contemplating elk on the ranch lands, are now occurring. Allowing the result of this failure to manage to become the de-facto baseline for this EIS is wrong and misleading. An attempt to validate the mismanagement through a NEPA process, by allowing the elk conflicts to continue, could be best described as a crime. NPS, in this EIS, must portray a full and honest description of the 1998 Elk EA and Management Plan, the NPS and the public's understanding of that plan (at least until 2001), an honest history of the elk management to date and a reasonable baseline that respects the current, operative 1998 Elk Management Plan and EA for this analysis. The DEIS comments from the ranchers who have experienced the history and impacts of this problem give the NPS reasonable solutions the problem so that both the elk and the historic ranches benefit - solutions already allowed under the current 1998 Elk Management Plan.

Upon reading the PRSRA comment letter, it is evident that all seashore ranchers are encouraged and excited to see the PRNS focus on preserving the continuing landscapes, now recognized as historic districts - the Shafter era diversified agriculture. This gives new hope that our ranches and farms will survive as viable businesses into the future. Small family farms cannot compete with industrial agricultural operations producing the same commodity for the same price. Without allowing the seashore ranchers to restore a reasonable portion of the historic diversity and practical operational flexibility, NPS would, in actuality, be contributing to the elimination of the ranches and the loss of an important cultural resource. The 29-page rancher comment letter details the modifications to the DEIS that are necessary to preserve ranching within the planning area.

The Lunny family has specific plans for the Lunny Ranch, most of which have been evaluated so that PRNS can approve these changes in a 20-year lease and Ranch Operating Agreement (ROA). The Lunnys plan to return the ranch to a diversified farm consistent with the time frame the National Historic Register meant to preserve and protect, 1860 to 1960, also described and celebrated by NPS as the Shafter era. While doing so, recognizing that its location is inside the highly visited working landscape of a national seashore, all improvements will be ecologically responsible, compatible with public visitation, public viewing, on farm tours and educational opportunities. The Lunny Ranch will become a current time, viable reflection of what originally protected Point Reyes and what made Point Reyes worth protecting into the future. The following planned activities, to be allowed in the GMPA, some minor modifications or clarifications to the EIS will be required.

1. Enhance row crop production. The Lunny Family would like permission to increase the row crop acreage from 6 to 30 acres. The EIS process should consider the fact that this small increase in acreage (24 acres) represents only

2 to 3 percent of the Lunny Ranch and approximately 1/10th of 1% of the planning area. This is properly viewed as small scale, historically appropriate diversification with all its social, economic and environmental benefits over monoculture. Historic records demonstrate that thousands of acres were planted with vegetables on the seashore ranches. Even if many ranchers elected to plant 30 acres each, it would total only a fraction of what existed during the Shafter era. The EIS should poll the ranchers to determine the level of interest in restoring row crop production. It is likely that few ranchers will be interested and the percentage of agricultural property that would restore row crops would be very low, but important. The EIS team should also acknowledge the fact that the Lunnys intend to simply convert 24 acres of silage fields (crop land) to vegetable fields (crop land). This should not be considered a change in use, it should be recognized as simply a change of crop. Normal agricultural activities in a continuing agricultural landscape. The Lunnys are not asking to convert native, untouched rangelands to crop land. The Lunnys recognize that there will be 24 acres less to continue silage crop production. The DEIS incompletely analyzes the restoration of this historic use. The DEIS comment letter from the ranchers within the planning area provides experienced insight for the EIS team to include in its analysis. The Lunny Ranch has some specific comments. Issues to consider are:

- a. This use in all likelihood existed on the G Ranch during the Shafter era;
- b. This use currently exists on the G Ranch. The DEIS proposes to limit diversification into row crops to 2-1/2 acres. The Lunny Ranch already has 6 acres, so it wouldn't be "diversifying" into row crops. By this, we assume our 6 acres can remain in row crop use because it pre-existed the GMPA - just as forage crop production, as it existed prior to the GMPA, can continue;
- c. The DEIS suggests, in the diversification section, that irrigation would be prohibited in row crops. The 6-acre Lunny Ranch row crop area has had permanent, underground irrigation, including 8 irrigation zones, electric vales and electronic timers. All of this infrastructure has been in place since about 2003 - 16 years. The Lunny Ranch has enough water for this purpose and there have been no conflicts with NPS or the visiting public. Because this activity pre-existed the GMPA by 16 years, we assume that this activity can continue and will not be taken away. The Final EIS should clarify that new restrictions apply to new activities and existing irrigation systems can remain in use. NPS must also follow the suggestions in the rancher comment letter, the reasons for irrigation, and allow irrigation on new row crop areas as well;
- d. Lunny Ranch intensive farm land acreage will decrease in forage cropland and increase from current 6 acres to about 30 acres in row cropland which represents less than 3% of the G Ranch and a minute fraction of the overall agricultural properties within the planning area. This is simply a change in crops at the Lunny Ranch and should be analyzed as such. The DEIS proposes 2-1/2 acres per rancher, which amounts to about 75 total acres of row crops in the planning area. Scoping comments requested that NPS ask each rancher if they plan to include row crops in their ranch plans. NPS met with most, if not all ranchers, to discuss specific plans, issues and questions. The final EIS should include the results of that analysis - how many ranchers are planning to include row crop production on their ranch? Knowing this answer, NPS can set a planning area maximum of 75 or more acres and allow the interested ranchers to use a reasonable portion of this total. This would allow ranchers to include a viable, historic row crop component to the ranch. 2-1/2 acres is not viable and therefore does not meet the stated goals of the GMPA. In conversations among ourselves and at Seashore Rancher meetings, we estimate that only two or three ranchers are planning to grow row crops. If this is true, the current restrictions in the DEIS would allow only the restoration of 7-1/2 acres of historic row crops - not the 75 acres NPS has deemed appropriate. This section of the EIS must be revised;
- e. At the Lunny Ranch, crop production will be located on land that is currently authorized for crop (forage) production, no new areas will be converted to cropland;
- f. Production in the 24-acre current crop area that will rotate into row crops will focus on crop species that were historically grown during the Shafter era, including artichokes, potatoes, beans and peas; and,
- g. Production in the 24-acre current crop area that will rotate into row crops will include dry-farming techniques.

2. Restore dairy production. The DEIS wrongly dismisses the restoration of historic dairy activities within the Point Reyes Historic Dairy District prior to evaluation. This was a use in this location during the historic period NPS is charged to protect and it is a continuing use on other ranches within the District and planning area. Only a few years ago, NPS correctly allowed another dairy in the district that had ceased operations to restore production. This DEIS carefully analyzes the environmental effects of dairy farms in the planning area. Now, in this EIS, is the time to analyze and consider the restoration of a dairy. Most of the analysis necessary has already been completed in the DEIS. If restoring this activity is not considered during this process, it would force the Lunny Family, or any other family, to initiate an expensive, onerous NEPA process to evaluate the exact same impact topics again. This would be wrong and unfair. Although the Lunnys do not plan to immediately re-start the dairy, we may, or another ranch may plan to re-start a dairy sometime in the near future. Knowing this NEPA review and GMPA will likely be the policy for NPS for at least the duration of the first 20-year permit and is intended to consider and evaluate the ranching activities during this future time frame, all potential activities necessary to ranching should be evaluated. This will allow the GMPA EIS to be used as expected - complete NEPA evaluation on all ranch activities, including mitigation measures, so that further NEPA analysis will not be required to implement the approved activities and mitigation measures. The Lunny Ranch proposes a small (100 cows), grass fed, organic Jersey herd much smaller than the other dairies in the planning area. The Grade A milking barn, corrals, fencing as well as most other infrastructure necessary to restore production already exist. A composting barn will be constructed near the milking barn in the ranch core - almost exactly where a much larger barn previously existed. The Lunnys will restore the small, on-farm butter making activity inside one of the existing buildings within the Lunny Ranch core. The whey bi-product of butter making will be fed to the hogs as was done on this G-Ranch historically. The butter will be sold at the on-farm retail location as well as other local, organic markets. This will be part of an important reconnection of PRNS and GGNRA ranches to the local food system. The Lunny Ranch dairy plan incorporates mitigation for most, if not all adverse effects of dairy production, including:

- a) Traffic Impacts. Because the plan includes a small, grass-fed herd, very little feed will need to be imported. Also, with on-farm processing, fewer milk trucks will be required for milk transportation.
- b) Air Quality. A composting barn will allow the cows to be inside and will keep the manure safely composting inside the barn. This eliminates the requirement to store manure in manure a manure lagoon and eliminates the need to spread the raw manure. A significant reduction in GHG emissions result from composting barns. Grass fed cattle produce less gastroenteric GHG than grain fed cattle.
- c) Water Quality. Compost will be spread on pastures, not raw manure. Cows resting in the composting barn will reduce the chance of water quality problems from manure and mud in storm water runoff.
- d) Visitor Enjoyment. Farm tours and visits to the on-farm retail will include a more comprehensive view of a historic dairy and associated activities within the historic dairy district. The small dairy component will allow for a more complete and sustainable farming system at the Lunny Ranch. The Final EIS must evaluate the restoration of this dairy activity and recognize the environmental benefits and mitigations built into the Lunny Ranch plan, which could be also be utilized elsewhere in the planning area.

3. Restore small scale hog production. The DEIS appears to support the Lunny Ranch plan to restore the following historic hog production: a. This use existed on the G Ranch during the Shafter era; b. The number of sows on the ranch would be limited to 8 and would be kept in the ranch core area; c. The hogs will utilize the waste vegetables from the row crop operations; d. Hog and cow manure will be composted on-farm; and, e. This use will avoid disposal of the above ranch resources.

4. Restore small scale chicken production. The DEIS appears to support the Lunny Ranch plan to restore the following historic hog production: a. This use existed on the G Ranch during the Shafter era; b. Both eggs and meat will be produced; c. The number of birds would be limited to 500; d. Chickens will be pastured; e. Chickens will be used to enhance pasture management; and, f. Chickens will be used to help control parasites within organic pastures.

5. The DEIS appears to support the Lunny Ranch plan to expand on farm organic composting. Currently, small scale composting occurs at the Lunny Ranch. Manures and green waste, including green waste, from PRNS can be co-composted. The Lunnys own and operate West Marin Compost in Nicasio, CA, and are expert, organically certified composters. Issues about organic composting to consider are: a. The Lunnys are experienced and qualified composters; b. Soil nutrient balancing - reduces nutrient loading on nutrient-rich soils and adds nutrients to soils in need of nutrients, organic matter and microbes; c. Preserves organic matter & nutrients from PRNS and keeps them within PRNS; d. Facilitates carbon farming BMPs; e. Increases carbon sequestration; f. Reduces raw manure spreading; g. Eliminates odors; h. Composting kills weed seeds before spreading on pastures and rangeland; i. Reduces GHG production from manure lagoons; j. Reduces GHG production caused by PRNS exporting greenwaste; k. Improves soil health; l. Improves pasture health; m. Improves quality of storm water runoff; n. Improves collaboration between PRNS and the ranchers; o. Improves collaboration between ranchers; p. Helps PRNS achieve GHG reduction goals; and q. Would take place within the ranch core area- within the feed lot area. 6. Build a roof over the feed storage area. This construction would help meet the Lunny Ranch goals as well as the NPS goals in the EIS: a. Protection of feed from rain damage; b. Keeping birds, including ravens, away from the livestock feed; c. Allows the Lunny family to purchase feed at the right time if a safe storage location is available; d. Would not change the use of the area; e. The roof will be the location of solar panels capable of producing all the electricity to operate the Lunny Ranch.

7. Begin direct on-farm sales of Lunny Ranch farm products as well as farm products produced on other seashore ranches. This EIS team should recognize that the Lunny family are experts on this issue. The Lunny family owned and operated the Drakes Bay Oyster Farm that was adjacent to the Lunny Ranch until it recently closed. The reasons for closure did not include the beloved farm stand where people could get a taste of the place or the farm tours where they could learn about the history and ecology of where their food came from. We had families from all around the world visit. We had regular school groups visit. It is not a question about whether seashore visitors would love and appreciate the farm stand - they always have, and they will love this new Lunny Ranch farm stand. NPS failed to fully analyze the continuation of the PRNS historic on-farm sales use. As this issue affects many seashore visitors and ranchers, and that the continued use of on-farm sales was properly addressed during the public scoping period of both the CRMP EA process as well as the current EIS process, NPS must fully analyze the relocation and continuation of this important asset in the final EIS. Ignoring the analysis in the EIS would imply that the status quo, including on-farm sales, is still an appropriate use. To avoid challenges to the FEIS, and to avoid the need for further NEPA evaluation to add this activity in the planning area following the FEIS and ROD, this activity should be fully evaluated and authorized where appropriate. Issues to consider are: a. This use has always been authorized within PRNS next door to the Lunny Ranch. The historic use will be relocated by only a half mile; b. Because the on-farm retail had been authorized by NPS within PRNS since the creation of the seashore (authorized for over 50 years) and only recently closed for reasons unrelated to the beloved farm stand, on-farm sales should properly be included as a baseline activity in this EIS; c. The Lunny family was the operator of the on-farm retail location within PRNS for over a decade, until it was recently closed. The Lunny family can verify that NPS never raised any concerns about the retail activities; d. NPS conducted an EIS to consider the renewal of the oyster company use permit. During this extensive NEPA process, where a report in excess of 1000 pages was generated, no adverse impacts from on-farm retail sales were identified and visitor enjoyment of the activity was recognized. The only potential concern raised by NPS was that some visitors might prefer a wilderness experience. As the ranch planning area is not a wilderness area, this would not be an issue to address in this EIS. Pursuant to NEPA, this GMPA EIS must rely on the fact that this is not a new activity and relocating the use would not create new impacts to consider and that a recent, formal NEPA EIS found no significant adverse effects of on-farm sales within this planning area; e. Seashore visitors are now temporarily missing the opportunity they had before the closure of the oyster farm; f. The Lunny Ranch farm stand will sell and interpret products from the Lunny Ranch as well as products from other ranches within the planning area; g. Allows planning area ranchers to collaborate at an on-farm sales location with safe egress and plenty of parking space; h. PRNS and other ranchers can participate in tour planning and other educational components; i. Provides opportunities for the visiting public to connect with the working landscapes; j. This activity will provide educational opportunities within the planning area as described by NPS in this DEIS: The Purpose and Need for this analysis has two goals: A) "Visitors have opportunities for diverse educational and learning experiences."; and B) "Visitors have

opportunities to enjoy expanded connections and greater access to diverse recreation." k. This activity's location will be in the ranch core.

8. Continue to produce and harvest on-farm forage crops. We appreciate that the DEIS will allow the Lunny Ranch to continue to grow forage crops on up to 180 acres per year. The Lunny Ranch believes that other ranchers could also benefit from forage production. We request that the NPS, in the Final EIS, analyze the benefits of new forage production within the pasture subzones on other ranches within the planning area.

9. Provide 2 new worker residences within the ranch building complex ranch core. The DEIS seems to support our plan to provide additional farm worker housing. The Final EIS should be more explicit. Issues to consider are: a. This use existed on the G Ranch during the Shafter era; b. Provides the rare, necessary farm worker housing in West Marin; c. Allows the Lunny Ranch to compete for good employees; and, d. Allows for the necessary staff for round the clock emergency work often encountered on a working ranch.

10. We are pleased that the DEIS includes public education as a priority in the planning area. Farm tours have become important to urban visitors as well as to ranchers and farmers for many reasons. The Lunnys are very pleased that PRNS has already allowed seashore ranchers to undertake this activity within PRNS. The Lunny Family is extremely experienced in giving farm tours. We have hosted many thousand farm tours within PRNS - mostly at the Drakes Bay Oyster Farm before it recently closed. The visiting public absolutely loves the opportunity to learn about where their food comes from - adults and children alike. The Lunnys request the approval for this activity on the Lunny Ranch as well. As PRNS has already authorized this use, it is unclear whether it needs to be evaluated in the current EIS. At the Lunny Ranch, seashore visitors could learn about how good stewardship on the farm leads to healthy food and thoughtful natural resource conservation. The visitors will be able to see a working ranch with cows, goats, pigs, chickens, small scale row crops and how the interrelationship of those farm activities are important to the sustainability and resiliency of a small, locally connected, family farm. The seashore visitors could leave the Lunny Ranch understanding why these dairy districts are now federally protected continuing landscapes and how the Lunny Ranch demonstrates that history. The Lunny Ranch could work with PRNS to plan and implement a collaborative farm tour program that could include visits not only to the Lunny Ranch, but also to other ranches within the planning area. Farm tours could be offered at no charge to the visiting public if connected with a farm stand that sells seashore rancher food products at the Lunny Ranch. This EIS should evaluate the impacts of allowing the Lunny family to charge a fee for special farm tours that may include a meal featuring foods produced in the planning area.

11. Operational Flexibility. To operate a successful ranching or dairying business, the rancher needs to be able to implement best management practices and make operational decisions quickly. Weather conditions and other factors may necessitate quick reaction by the rancher to protect natural resources and to protect their businesses. Although the DEIS attempts to create flexibility, more analysis is required. a. Brush Removal - Invasive brush has been controlled by humans in this region for millennia. For the past approximately 70 years, the Lunnys have controlled brush on the G Ranch by grazing, burning, dozing and mowing. The Lunnys request permission to continue this vital activity - specifically, mowing and planned, focused grazing with goats. The restrictions detailed in the DEIS would allow goat and sheep grazing only in the ranch core and pasture subzones. The largest risk of brush encroachment and loss of habitat and scenic vistas is within the range subzones. Furthermore, the DEIS restricts other invasive plant management tools within the range subzone. Because goats and sheep can help provide invasive plant control, these species should be allowed within the range subzone. Allowing the use of goats or sheep on rangeland would be consistent with the PRNS use of goats within the planning area for the same purpose. b. The Lunny Ranch appreciates the analysis in the DEIS and Appendix D, where NRCS water development and distribution practices will be allowed. Water and Pasture Improvements - The Lunnys request that the PRNS authorize the implementation of the NRCS designed and approved water and pasture planting project for the Lunny Ranch and approved by PRNS. (NRCS Water Development description previously provided during scoping.) Once implemented, all water on the Lunny Ranch will be moved by solar pumping systems and gravity, new red-legged frog habitat will be developed, wetland and riparian areas will be protected, cattle water troughs will be moved away from sensitive habitats and the Lunny's certified organic cattle will be provided cleaner water. The NRCS performed NEPA review for this project and approved the project. As all the

proposed practices have been analyzed by both NRCS and this EIS, no additional NEPA compliance will be required to implement the Lunny Ranch plan. c. This EIS recognizes the many benefits of composting and allows on-farm composting. For the reasons raised by the ranchers in the planning area, the EIS should be corrected to allow compost use within the pasture subzone on beef ranches and within the range subzones when appropriate. In the DEIS, NPS prohibits "fertilizers and compost" use as if they are the same. They are not, and compost, for all its benefits, should be allowed. The Lunnys plan to continue composting, using feedstocks from both on and off farm, to spread compost on pastures and cropland including row crops, silage, hay, and haylage producing areas. With prior NPS approval, the Lunny Ranch will spread compost on certain rangelands used solely for grazing. The EIS recognizes the benefits of compost application on dairy ranches. The EIS must fully analyze the identical benefits of compost application on beef ranches as well. When the analysis is corrected and compost is properly allowed on all pastures, the Lunny Ranch plan can be implemented without delay. d. The DEIS lacks meaningful analysis of Carbon Farming. The Lunny Ranch applied for a grant for Carbon Farm Plan with the Marin County Resource Conservation District (MRCRD). The Lunny Ranch was successful in obtaining the grant. The Lunny Ranch looks forward to working with the MRCRD and its carbon farm plan partners to create a plan to sequester more carbon in the soils of the Lunny Ranch. The practices included are all practices known to benefit the natural resources and most have already been allowed to be implemented on ranches within the seashore by PRNS. This EIS must evaluate creating a clear path to implementing the stewardship practices included in the carbon farm plan without delay. This EIS should fully evaluate the carbon benefits - the capture of atmospheric CO<sub>2</sub> and the increased soil carbon that results from implementing these practices. The plan must also evaluate the benefits to soil health and water quality that will result for complete farm plan implementation. Carbon farm plan implementation can improve visitor experience by visibly improving pasture and rangeland health and through education about how well-planned grazing management can improve environmental quality, including air quality. Many, if not all individual practices often used in a comprehensive carbon farm plans have been analyzed in the DEIS and no adverse effects were identified. The Final EIS must explicitly allow ranchers to implement complete carbon farm plans without further NEPA compliance and without delay.

12. Grazing activities -The Lunnys have implemented sensibly planned grazing techniques which have improved pasture and rangeland health and productivity. This is demonstrated by the PRNS range monitoring that reviews and reports on the quantity of forage left behind after the grazing season has ended in the fall - residual dry matter (RDM) measurements. PRNS requires a minimum of 1200 lbs. of RDM per acre. According to PRNS (see attached NPS RDM report), the Lunny Ranch had 7200 lbs of RDM per acre in 2018 - the highest RDM measurement in all PRNS and GGNRA agricultural properties. This excessive RDM is damaging to the natural and cultural resources in a number of ways, including increased weed invasion, increased brush proliferation, increased GHG emissions from decomposing vegetation, loss of carbon sequestration due to halted photosynthesis, reduction of native pasture species due to reduced light making it through lodged vegetation to the soil, increased fire danger and an economic loss to the Lunny family. The regular, damagingly high RDM measurements at the Lunny Ranch indicates poor pasture management - under grazing due to insufficient stocking rates and/or stocking density. Currently, the Lunny Ranch is limited by a maximum number of cows that was arbitrarily set in the 1990s. PRNS should allow the Lunnys, and all ranchers to make stocking decisions to meet resource goals, including RDM. PRNS should monitor the results to ensure resource goals are met. Ranchers have the long-term range management experience, are on the ground daily to monitor and decide how much grazing pressure is necessary, when to move cows to another pasture and when to sell cows if necessary. Ranchers need to be good stewards to preserve the productivity of the grassland. Having PRNS staff simply counting cows as the only management tool for grazing compliance can harm the very resources they think they are protecting. The Lunny family has made multiple attempts to correct this management deficiency. This EIS should review the record at PRNS. The DEIS gives reason for new concern about PRNS grazing oversight. PRNS staff recently created a new, theoretical computer model to help determine pasture and rangeland carrying capacity. The suggestion that this new, untested tool be used to help determine carrying capacity is premature. According to the DEIS, NPS used this new theoretical model to predict that 50 tule elk grazing on ranchers' pastures would not affect the forage availability or RDM. The obvious reality is that 50 elk eat lots of forage and therefore absolutely affect forage availability for the cows and absolutely affect RDM. Knowing this failure of this new model, as well as other inaccuracies that are likely to become evident in a brand new, theoretical model, NPS, in the Final EIS, must allow for some years of testing and improving the model before it is used in any way to help determine carrying capacity. Allowing time

for testing and improving the model, or discarding the model, would not create any management or environmental consequences. Carrying capacity can be derived by data already available to the rancher and the NPS. Historic records are the most useful planning tools. Ranchers know how many cows have been on their ranch throughout the years. The records of rainfall are available to consider poor forage years. In the DEIS, NPS states that it will continue to monitor RDM measurements on ranches. NPS and the ranchers can use these records to make appropriate adjustments to stocking density and stocking rates on an annual basis as part of the ROA amendment process. It may be impossible for theoretical projections to calculate the variations in individual ranch resources and ranch managers. When to move cattle from one pasture to the next can have a large impact on forage production. Only an experienced manager with a trained eye will likely make the best decisions. A theoretical model would be incapable of including these important management nuances. Theoretical carrying capacity projections may serve a more important purpose in an area where historic data and multi-generation expert rancher/ range managers are not available. For the last decade, the NPS has refused to adjust the Lunny Ranch carrying capacity. Thankfully, based on the DEIS, adjustments to carrying capacity will be made based on RDM and other historic records and the Lunny Ranch fully expects a significant revision to the allowable forage consumption. The Final EIS must not allow the new, faulty theoretical model to confound good range and pasture management decisions. The EIS team should keep this in mind while contemplating this issue: Ranchers understand carrying capacity and forage availability. Ranchers know that if the rangeland or pastureland is overgrazed, less forage will be available in subsequent years. Ranchers want sufficient RDM for long term economic reasons and know how to achieve these results. This EIS should be corrected so that the NPS role is to ensure that RDM and other resource goals are met. If goals are not met, NPS should work with the rancher and oversee individual ROA changes in order to achieve resource goals. NPS should not attempt to prescribe, limit, enforce, or otherwise micromanage cow numbers, when stocking rates are only one component a rangeland manager uses to achieve resource condition goals and different grazing practices on the same pastures and rangeland can affect carrying capacity. NPS must recognize that these leases in the planning area differ from most public land grazing leases. In the planning area, ranches are managed by the same families that have been managing the grazing for generations, the resources are in good condition and, especially with 20-year leases, the ranchers have long term goals to protect the resources - water, soil, forage - because their future economic well-being depends on it. In the planning area, the ranchers have the most experience managing the resources. Conversely, most other public land leases are for 5 years and many go back out for public bid at the end of the lease term. Ranchers may not have long term resource management goals and may not have long term experience managing the subject resources. In these more common public grazing permit instances, the public lessors (BLM, Forest Service, and others) may have more experience and may have long term resource goals. It makes more sense for these public agencies to more strictly manage these short-term grazing permits and dictate grazing methods and stocking density. NPS has the responsibility to ensure the public resources within the planning area are properly cared for. NPS is not required to micromanage ranchers. In the planning area, NPS should be partners with the ranchers and make sure that resource goals are met. NPS should monitor results. If a rancher fails to meet RDM requirements, NPS should work with the rancher, determine what could be the cause and, together make changes so that resource goals can be met.

13. Greenhouse Construction - Although the Lunnys have temporarily fallowed the 6-acre irrigated row crop garden, for the past decade, the Lunnys have depended on outside sources for organic vegetable starts. Star Route Farms in Bolinas has provided many of the plants grown in the current 6-acre vegetable crop area on the Lunny Ranch. Many plants do not do well when started by seed in the field. An on-farm greenhouse has become an economic necessity. The Lunnys request permission to build a small greenhouse on the G Ranch within the ranch core. Although the DEIS suggests that new, necessary construction is allowed within the ranch core, it did not fully evaluate the addition of a greenhouse within the ranch core area of the Lunny Ranch. Elsewhere in Marin County, this minor farm structure could be built without a permit. The Final EIS must more directly analyze and approve these types of small, necessary structures within the ranch core. Otherwise, interested ranchers could be subjected to another onerous and unnecessary NEPA process.

1. Foundation Repairs to Dairy Barn - The south end of the milking barn on the G Ranch is settling and is causing other structural damage. The Lunnys request permission to support the foundation and to make the necessary structural repairs. All work will be performed by licensed contractors upon PRNS approval. The DEIS appears to allow these kinds of repairs and the Lunny Ranch will commence with the repairs after the Final EIS and GMPA is complete.

2. Wall Replacement and New Roof on

Shop Containing the Ranch Electrical Service - - The Lunnys have made several requests to PRNS to get this building repaired. PRNS has told the Lunnys that there is no budget for this work. The Lunnys have requested permission to make the necessary repairs to this building with the Lunny Ranch paying for the repairs. All work will be performed by licensed contractors. The Lunnys have consulted with 2 contractors who have agreed that if the repairs are not made immediately, the building is likely to fall to the ground making repairs impossible. This EIS should review the record, confirm the repeated requests, confirm the offer by the Lunnys to pay for the repairs, and to confirm that the historic building will collapse soon if not repaired. The DEIS appears to allow these kinds of repairs and the Lunny Ranch will commence with the repairs after the Final EIS and GMPA is complete. 3. Lease valuation needs to be clarified in the Final EIS. It is unclear how an overall appraisal of all ranches in the planning area can be of use. It seems that individual appraisals would be more appropriate. 4. The Lunny Ranch recognizes the usefulness of creating subzones on ranches to allow for fair and streamlined management throughout the planning area. For this new zoning and the associated use restrictions to function properly, the zones need to be properly identified. We understand that this DEIS included the first attempt by NPS to create zone boundaries, and it should be expected that the boundaries may need some adjustments. For the Lunny Ranch, most of the proposed zone boundaries seem appropriate; however, two small, but critical, corrections are needed. One of the corrections necessary is an adjustment of the ranch core subzone boundary. The DEIS states that the ranch core subzones contain previously disturbed lands and little to no water resources. Correctly, NPS included the buildings, most of the livestock corrals, one of the feeding areas and the alleys that connect them. What was missed is an area closer to the buildings that includes our bull pen and our row crop area. The bull pen has always been a high impact feeding area. It contains feed racks, concrete slabs, a concrete manure pit and pump station among other improvements. This area has historically been a springer lot for cows to be contained and watched closely during calving. It has always been a high impact winter feeding area. There is no question that this area is just as much part of the ranch core as the other feedlot already included. Also, once a part of the springer lot / bull pen feeding area is the 6-acre row crop area. Prior to row crops, this area was part of the previously described feed lot / springer lot / bull pen with the same intensive use. In approximately 2003, with NPS permission, 6 acres of the bull pen was fenced with 6' tall woven wire to protect the row crops and permanent, underground irrigation was installed throughout the 6 acres, including electric valves and electronic timers. This area is ripped, tilled, amended with compost, manure and other inputs. Many varieties of vegetables and berries have been grown in this area. Some of the products have been directly sold to restaurants and some have been sold at farmer's markets. Cover crops are rotated into the organic row crop system and organically approved mulches are used from both on and off farm sources, including commercially produced, organically certified compost and mulch from West Marin Compost. Beds are listed to create planting rows. The Lunny Ranch has temporarily rested the row crop production area and plans to begin planting this area in the near future. This area does not qualify as pastureland or rangeland. It absolutely belongs within the ranch core subzone. Attached is an accurate ranch core map. The Final EIS and the Lunny Ranch ROA must include these highly developed, highly impacted, high use areas adjacent to the building complex within the ranch core subzone. The other boundary correction necessary relates to only one of the four proposed resource protection subzones. Two of the proposed subzones at the northwest end of the Lunny Ranch, near Abbotts Lagoon (see figure 14, page A-15), have water and wetland resources where increased management and protection may be appropriate. There are springs with potential red legged frog and Sonoma alepecuris wetland habitat. Currently, these areas are the only water sources available for a large area of the Lunny Ranch. The Lunnys recognized the habitat value of these two wetland areas and previously proposed a project to protect these areas. Currently, cows enter the wetlands to drink water from stock ponds developed by the Lunny Family in the 1950s. This project, already approved for cost share from the Natural Resources Conservation Service Environmental Quality Improvement Program (EQIP), will allow the Lunny Ranch to collect water from these two springs, install solar pumping stations, piping and water troughs away from sensitive habitats. This previously planned project will essentially accomplish what appears to be a goal of the NPS in the DEIS. Any use of these areas - flash grazing to improve red legged frog habitat, or other prescribed grazing - - will only occur at the direction of NPS. The complete Lunny Ranch EQIP plan was provided to NPS during scoping and the included practices are included in the DEIS analysis, therefore, the Lunny Ranch expects prompt approval and inclusion of the full EQIP project in the Lunny Ranch ROA. Once this project is completed, NPS and the Lunny Ranch will be allowed to adjust the management these wetlands. It is unclear why the NPS is proposing the resource protection area adjacent to the sand dunes along the western border of the Lunny Ranch. This is an area where following dune grass removal, the windblown dunes are completely covering rangeland forage, as well as significant Sonoma alepecuris stands.



Cattle grazing, unlike sand, has been shown to have positive effects on this endangered species. The Final EIS should identify the reason for this particular proposed resource protection subzone located near the sand dunes. The proposed resource protection subzone proposed along Sir Francis Drake Boulevard must be changed. This area, by definition, is actually pasture land. Because the Lunny Ranch farm plan does not include any uses of this area other than occasional brush control, this can be included in the Lunny Ranch rangeland subzone. This proposed resource protection subzone location along Sir Francis Drake Boulevard was discussed at a meeting at PRNS headquarters on May 9, 2019. Present at the meeting were three members of the NPS EIS team: Dylan Voeller, David Press and Brannon Ketcham. I explained the importance of this area to the Lunny Ranch. This is not only valuable forage, it is also a critical path on the pasture rotations used at the Lunny Ranch. We question the need for this extremely restrictive zoning. I was told that no sensitive or endangered species or habitat is present. The only concern the NPS has is that this can be a very wet area during the winter months. Not only does the Lunny Ranch concur with this assessment, I provided a map, before I had ever seen the proposed zoning, that includes a new, proposed fence that will allow the Lunny Ranch to exclude this area during the wet season. As with the two other NPS areas of concern, the Lunny Ranch plan already provides the solution. When I asked if the proposed map could be corrected, I was told that the proposed zones were already prepared and, most likely, could not be changed prior to the release of the DEIS. The proposed resource protection zone along Sir Francis Drake Boulevard must be changed to range land zone. This change, with specific agreements within the ROA to exclude this area when the soil is too wet, would not cause any harm to the resource that has been grazed for 150+ years. A unilateral decision to include this area as a natural resource protection zone, with the associated restrictions, would cause economic harm as well as severely impact proper rotation use of pastures at the Lunny Ranch. This correction must be made in the Final EIS. It is fully understandable that the zones created by NPS, without historic use context or rancher input, would need some adjustments prior to initiating the zoning framework conditions. The Lunny Ranch is happy to provide the necessary subzone framework input prior to the completion of the GMPA EIS and Lunny Ranch ROA. Attached is a copy of the corrected ranch core subzone.

The Lunnys recognize that most of the above can be approved without a formal NEPA analysis just as PRNS has done in the past. Nevertheless, because new, comprehensive, 20-year permits are being developed, the Lunnys want to be sure that each of the items raised by PRSRA ranchers, the PRNS and GGNRA Family Ranchers detailed DEIS comment letters and the Lunnys comments and requests, are authorized and incorporated in the new Lunny Ranch - Historic G Ranch lease and ROA. The Lunnys appreciate this opportunity to further explain our ranch plan and to further describe what is needed to fully execute an environmentally conscious, viable, small scale Shafter era type diversified farm for the benefit of the Lunny family, the community, the visiting public and the local food system.

With the necessary analysis and corrected restrictions in the Final EIS, this simple Lunny Ranch plan, once approved, would allow the Lunny family to restore an exciting, diversified, profitable, visitor-friendly farm that more closely resembles the Shafter era ranching while protecting the seashore's natural and cultural resources.

When PRNS allows the Lunny Ranch plan to come to fruition, the visiting public passing by the Lunny Ranch is not likely to notice any change. They would have to look carefully to notice the greenhouse and new farm worker housing in the core area. Only a local resident or a regular visitor could pick out the minor changes.

Even the regular visitor is likely unaware that there were several large barns and additional worker housing on the G Ranch that are now gone, and that the new structures simply are replacing a small portion that has been lost over time. They probably wouldn't notice the increased soil carbon offsetting their GHG produced during their visit to the seashore by their automobile. The new seashore visitors wouldn't probably notice that more members of the Lunny Family are now working on the farm and staying connected to the community they were raised in. The new visitor may not realize that this ranch is now more fully connected to local food system and the recovery of the historic uses makes it much more resilient and likely that it will survive through changing economic times and changes to the pasture productivity due to climate change. The Final EIS must fully evaluate the enormous benefits that would result from this complete plan.

A new or returning seashore visitor is more likely to notice the availability of on farm food products from seashore ranchers at the Lunny Ranch farm stand, the availability of farm tours in collaboration with PRNS staff, a chance to see a few hogs, chickens, some vegetables growing with farm-produced compost soil amendment created from otherwise farm waste products - all a small demonstration of the true historic use the historic G Ranch on the Point Reyes Peninsula. The Final EIS should celebrate the fact that PRNS and the NPS has allowed all or most of these uses at PRNS and at other units of the NPS. The Final EIS and GMPA should encourage restoration of these historic ranch practices with the understanding that PRNS was created because of the ranchers. PRNS is a national seashore and not a national park, where parks were created for quieter, contemplative uses, and seashores were created for more public activities, recreation and historic uses. PRNS is asked to preserve the cultural resources and the agricultural properties within the seashore that are now designated as national historic dairy districts - both PRNS and GGNRA. Supporting the Lunny Ranch farm plan meets all NPS objectives at PRNS as stated in the DEIS - natural resource conservation, cultural resource conservation, historic resource preservation and visitor enjoyment.

Clearly, this Lunny Ranch Plan includes only high-level descriptions of historic use restoration. Much more detail will be necessary for PRNS to prepare the Lunny Ranch 20-year, renewable permit and Ranch Operating Agreement. The Lunny family pledges to work with the team preparing the ROA to answer any questions regarding the Lunny Ranch farm plan.

Sincerely,

The Lunny Family

[attached is a copy of the Point Reyes National Seashore 2001 Year in Review.]

#7563

Name: Coda, James

Correspondence: Re: Comments on Your Draft EIS for a GMP Amendment Dear Superintendent Muldoon:  
INTRODUCTION

I am responding to your request for comments on a Draft Environmental Impact Statement (DEIS) regarding the development of a General Management Plan Amendment (GMPA) for the management of areas of Point Reyes National Seashore (PRNS) and Golden Gate National Recreation Area (GGNRA) now managed for beef cattle ranching, dairy farming and full-time residential use.

PRNS and GGNRA are units of the national park system and, as such, must be managed primarily to protect the natural resources of the parks and ranching is not consistent with that, at least not as practiced in these two parks. Your five ranching alternatives show that ranching will not protect natural resources, but will instead do great harm to the natural resources of each park. Under the circumstances, you have no choice but to prepare new alternatives that comply with your statutory mandates. You should prepare such alternatives and recirculate the DEIS. If you don't do that, you have no choice but to adopt Alternative F because it is the only one that complies with your statutory mandates to protect natural resources above all else. My preference is that you simply choose Alternative F now.

I have some experience in this area. I spent 35 years working in the federal government as an attorney. I started my legal career in the Department of the Interior. The first six years were spent in Interior's Headquarters handling legal matters involving BLM and its management of the public lands, especially grazing, on a national level. I then spent five years handling legal matters for the National Park Service (NPS) in the Solicitor's Office in San Francisco. One of the first

matters I worked on after arriving in the San Francisco Office was assisting the

U.S. Attorney's Office in defending a rancher's suit to stop the reintroduction of tule elk into PRNS. I finished my career as an Assistant U.S. Attorney in the San Francisco U.S. Attorney's Office specializing primarily in defending federal land management agencies, such as NPS, in suits under laws such as the National Environmental Policy Act (NEPA).

I have read the draft Foundation Statement, the DEIS, the 2019 Grazing Plan, the 2019 Natural Resources Condition Assessment, the 2013 Coastal Watershed Assessment, the 1998 Elk Plan and many other documents applicable to the DEIS, the GMPA and the cmTent ranching area. I commented during both rounds of the Comprehensive Ranch Management Plan process and both the initial request for comments on a conceptual range of alternatives and the later request for scoping comments regarding a GMPA. I incorporate those comments herein by reference. Since 2010 I have also spent over 150 days in the ranching area observing and photographing wildlife and the lands of the ranching area, including the condition those lands are in.

## SUMMARY OF MAJOR COMMENTS

While I have many comments on your DEIS, some of the main ones are summarized as follows:

First, your two previous steps in the scoping process and this DEIS show that you have pre-judged the outcome.

Second, the 1916 NPS Organic Act and provisions in the PRNS and GGNRA legislation require that the lands be managed so there is no harm to natural resources. Pages 4-5. All five ranching alternatives involve significant harm to natural resources. They are not lawful choices, given these three laws. That leaves NPS with two choices: either choose Alternative F or prepare a supplemental DEIS that has ranching alternatives that comply with the requirement to manage the land to avoid harm to natural resources. It goes without saying that I prefer Alternative F.

Third, your planning procedures require you to set forth in the Foundation Statement any language in the 1916 NPS Organic Act and/or park statutes relevant to this planning process. The Organic Act and the PRNS and GGNRA statutes

contain language concerning your overarching duty to protect natural resources and you have deliberately hidden this duty from the public. By failing to mention these three laws in the Foundation Statement you are, in effect, "hiding the ball" from the public; i.e., being dishonest. Pages 3-8.

Fourth, ignoring these three laws and hiding them from the public in the Foundation Statement won't make them go away. Neither will arguing that they don't say what they say. Yet, in the section of the DEIS called "Alternatives Considered, But Dismissed From Further Analysis," the Park Service states that the language in the seashore statute that the Secretary must manage the seashore in a manner consistent with the maximum protection, restoration, and preservation of the natural environment is not mandatory, but optional, and can be treated simply as an alternative which the Park Service then summarily rejects. Page 7-9.

Fifth, you assume dairy cows drink an average of 20 gallons of water per day when in fact they drink an average of 40 gallons of water per day. How much they eat, how much milk they produce and how much manure they produce are all related to how much water they drink. Consequently, all of your assumptions and calculations on dairy cows are wrong. Pages 12-13.

Sixth, you grossly underestimate average beef cow weight which understates forage consumed. You assume beef cow average weight is 1,000 pounds when the average Angus cow (virtually all cows in the two parks are Angus) weighs 1410 pounds. The beef cows eat much more than you assume and this makes your calculations of how many Animal Units each ranch can accommodate far too high. Consequently, beef cattle are severely overgrazing the parks which is obvious to anyone who drives through the ranching areas. Page 14-15.

Seventh, growing silage must be stopped. Sowing non-native seeds is prohibited by the three statutes. You have a statutory duty to preserve and restore the native coastal prairie, not to do the reverse. More important, the

mowing kills nesting birds and some mammals. I have seen a video showing a coyote pulling the mangled body of a deer fawn from a mowing windrow in the Seashore this past spring. Knowingly approving ranching actions that involve killing of wildlife is clearly prohibited by the Organic Act, the two park statutes, the Migratory Bird Treaty Act, and the Endangered Species Act to the extent any threatened or endangered wildlife is killed by the mowing. Page 17-18 and elsewhere.

Eighth, manure spreading must be stopped. In addition to fouling water courses, manure spreading also spreads Johne's disease. You should also require that all dairy herds be made Johne's-free by a long-term program of testing and culling cows (and elk, to the extent necessary). Manure spreading also spreads weed seeds that primarily come into the two parks mixed in the hay which is hauled in by the hundreds of eighteen-wheeler trucks that come into the parks each year for the dairy ranchers and some beef ranchers.

You could largely correct the latter problem by requiring that all hay imports be certified weed-free. You already require certified weed-free hay for people who want to bring their horses into national parks. The same is true for anyone bringing horses onto BLM and Forest Service lands. Requiring a person who wants to ride a horse in a national park to bring with him certified weed-free hay and yet allowing your ranchers to bring in hundreds of trailer trucks of hay each year that is not weed-free is astounding and unlawful under your three statutes. Page 18 and elsewhere.

Ninth, hazing elk violates your three statutes. The DEIS states that "[u]nder Alternative A, actions to reduce the impacts of elk on ranches would continue to include hazing, habitat enhancements and fence repairs." Management priorities are upside down. Your three laws, which put natural resource protection first, prohibit the practice of harassing elk. Elk are the Park Service's first priority. Ranching is not a priority, period. Pages 18 and elsewhere.

Tenth, to the extent cows are allowed to stay, you should allocate forage for elk. After determining the total amount of forage on all ranches used by elk, first allocate how much forage the elk need and then allocate the rest to livestock. Your three statutes require this. Even your 2019 Grazing Plan and NRCA recommend that forage be allocated to elk. Page 18.

Eleventh, the tens, if not hundreds, of miles of barbed wire fencing in the two parks is harmful to wildlife and contrary to the three statutes. It should be removed. To the extent it remains it should be made wildlife-friendly immediately. Page 18-19.

Twelfth, diversification, to the extent it exists today, and as envisioned under the DEIS, should not be allowed. Park wildlife will prey on these smaller domestic mammals and chickens and the ranchers will retaliate. Exclusion fencing in pastures will reduce wildlife territory in the park by 34%. Livestock guardian dogs kill predators when they can. All of this is contrary to your duties under your three statutes. Page 20-21.

Thirteenth, long term leases are inconsistent with your duty to prepare a General Management Plan every 10 to 15 years. Furthermore, ranchers don't want 20-year leases so they can get financing to improve Government-owned property; they want them to avoid having to worry about getting another lease every 5 or 10 years. Page 16.

Fourteenth, while NPS may have authority to grant leases and issue permits for ranching, there is no authority to give the ranchers any right of succession in real estate. It is also contrary to NPS's obligation to do a General Management Plan every 15 years to look again at how lands should be managed and whether ranching is still appropriate. Page 16.

Fifteenth, appraisals should be based on appraised values for other comparable ranches in Marin and Sonoma counties. Several unsupportable rationales by NPS for lowering rents, such as the fact that, technically, a hiker could walk across a fenced pasture containing cows, possibly a bull, and manure all over the ground, if he or she wanted to do that. No one wants to do that. Page 20.

Last, you have written a programmatic DEIS. To the extent you also intend it to be a site-specific one, it is totally

inadequate.

## CHAPTER 1: PURPOSE OF AND NEED FOR ACTION (Pages 1-7)

### The Foundation Statement

As explained below, the Foundation Statement misleads the public and is flawed. PRNS and GGNRA are units of the national park system and, as such, must be managed primarily to protect the natural resources of the parks. There are three natural resource protection laws applicable here.

The first is the 1916 NPS Organic Act which applies to all units of the national park system, including PRNS and GGNRA. The Organic Act provides, in pertinent part, as follows:

§ 100101 (a) In General-  
s

The Secretary ... shall promote and regulate the use of the National Park System by means and measures that conform to the fundamental purpose of the System units, which purpose is to conserve the scenery, natural and historic objects, and wild life in the System units and to provide for the enjoyment of the scenery, natural and historic objects, and wild life in such manner and by such means as will leave them unimpaired for the enjoyment of future generations.

54 U.S.C. § 100101(a). (Emphasis added.)

With respect to the Organic Act, the Ninth Circuit Court of Appeals has held that the language quoted above means 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).

The other two laws are the PRNS and GGNRA statutes. The PRNS legislation provides, in pertinent part, as follows:

§ 459c-6. Administration of property

(a) Protection, restoration, and preservation of natural environment

Except as otherwise provided in sections 459c to 459c-7 ... the property ... shall be administered by the Secretary without impairment of its natural values, in a manner which provides for such recreational, educational, historic preservation, interpretation, and scientific research opportunities as are consistent with ... the maximum protection, restoration, and preservation of the natural environment within the area ....

16 U.S.C. § 459c-6. (Emphasis added.)

The quoted language makes clear that, like the Organic Act, the Park Service is required to manage the Seashore in such a way as to not cause "impairment of its natural values." The law goes on to state that even traditional uses of national parks, such as "recreational, educational, historic preservation, interpretation, and

scientific research opportunities" are allowable [only] to the extent "consistent with ... the maximum protection, restoration, and preservation of the natural environment within the area ...." The highest priority is to not impair natural values. Recreation, education, historic preservation, etc. are all subject to that highest priority, not equal to it. It also makes clear that the Park Service's job is not just to protect the natural resources, but to restore them to their natural condition, that is, the condition they were in before man changed them.

The GGNRA legislation provides, in pertinent part, as follows:

## §46066 - Establishment

In the management of the recreation area, the Secretary ... shall utilize the resources in a manner which will provide for recreation and educational opportunities consistent with sound principles of land use planning and management. In carrying out the provisions of this subchapter, the Secretary shall preserve the recreation area, as far as possible, in its natural setting, and protect it from development and uses which would destroy the scenic beauty and natural character of the area.

16 U.S.C. § 46066. (Emphasis added.)

These three laws are not mentioned in the draft Foundation Statement even though NPS planning procedures state that such statutory language is required to be in the Foundation Statement:

### 2.2 Major Elements of Park Planning and Decision-making

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Foundation Statement-The planning process begins with the development of a foundation statement that is based on the park's enabling legislation or presidential proclamation and that documents the park purpose, significance, fundamental resources and values, and primary interpretive themes. It also includes any relevant laws and executive orders that apply to the national park system or to the individual park unit ....

General Management Plan - This is a broad umbrella document that sets the long-term goals for the park based on the foundation statement. The general management plan (1) clearly defines the desired natural and cultural resource conditions to be achieved and maintained over time ....

<https://www.nps.gov/policy/mp/chapter2.htm> (Emphasis added.)

Ignoring these three laws and hiding them from the public in the Foundation Statement won't make them go away. Neither will arguing that they don't say what they say.

Yet, in the section of the DEIS called "Alternatives Considered, But Dismissed From Further Analysis," the Park Service states as follows:

Commenters suggested NPS should manage all park lands solely for the protection, restoration, and preservation of natural resources. In addition to managing park lands for the protection of natural resources, NPS also must manage cultural resources and provide for visitor use and enjoyment in a manner consistent with applicable legal requirements. As a result, management decisions cannot solely be based on impacts to natural resources. This approach was dismissed from further analysis because it would not address impacts on other NPS resources and values that NPS is mandated to consider.

DEIS, 59 (Emphasis added.).

This statement shows NPS is unwilling to follow the clear language of the three statutes. It is also in disregard of NPS management policy. (It is also wrong to treat these laws as though they can be considered as alternatives which the Park Service is free to reject. These laws apply to all the alternatives and everything else the Park Service does in managing the natural resources in these two parks.)

Here's what NPS management policy says:

#### APPLICABLE NPS POLICY

NPS management policies provide as follows:

##### 1.4.4 The Prohibition on Impairment of Park Resources and Values

While Congress has given the Service the management discretion to allow impacts within parks, that discretion is limited by the statutory requirement (generally enforceable by the federal courts) that the Park Service must leave park resources and values unimpaired unless a particular law directly and specifically provides otherwise. This, the cornerstone of the Organic Act, establishes the primary responsibility of the National Park Service. It ensures that park resources and values will continue to exist in a condition that will allow the American people to have present and future opportunities for enjoyment of them.

The impairment of park resources and values may not be allowed by the Service unless directly and specifically provided for by legislation or by the proclamation establishing the park. The relevant legislation or proclamation must provide explicitly (not by implication or inference) for the activity, in terms that keep the Service from having the authority to manage the activity so as to avoid the impairment.

Management Policies of 2006, 1.4.4. (Emphasis added.)

The Park Superintendent must also work to meet the non-discretionary standard for Improving Resource Conditions:

The Service will also strive to ensure that park resources and values are passed on to future generations in a condition that is as good as, or better than, the conditions that exist today. In particular, the Service will strive to restore the integrity of park resources that have been damaged or compromised in the past.

NPS Management Policy § 1.4.7.2.

NPS Management Policies.

NPS defines "impairment" as any authorized activity that "would harm the integrity of park resources or values, including the opportunities that otherwise would be present for the enjoyment of those resources or values." NPS

Management Policies § 1.4.5 (2006). To ensure that an authorized activity will not violate the non-impairment mandate, NPS must determine the activity will not impair park values or resources prior to authorizing the activity. See, e.g., *Sierra Club v. Mainella*, 459 F. Supp. 2d 76, 103 (D.D.C. 2006). (Emphasis added.)

As an official interpretation of the Organic Act's non-impairment mandate, § 1.4 of the Park Service's Policies have been held to be enforceable against the agency. *Greater Yellowstone Coal. v. Kempthorne*, 577 F. Supp. 2d 183, n. 1 (D.D.C. 2008).

## RANCHING'S IMPACTS ON NATURAL RESOURCES

The DEIS makes it clear that continued cattle ranching, as proposed in the current ranching alternatives, will have detrimental environmental consequences on all natural resources, including soils, vegetation, water quality, air quality, and wildlife (especially elk). Consequently, all the ranching alternatives violate the Park Service's duties under the three statutes (not to mention the policy statement above) and are therefore unlawful. Under these circumstances it makes no sense for the Park Service to go forward with a Final EIS. All funds spent on this DEIS have been wasted and will continue to be wasted.

In view of the above, the Park Service needs to develop new ranching alternatives for the DEIS that do not violate the three laws quoted above and recirculate a supplemental DEIS for public comment. Failure to do that leaves NPS no choice, but to choose Alternative F, which I favor in any case.

## CHAPTER 2. ALTERNATIVES (Pages 9-63)

All five of your ranching alternatives violate the three NPS laws and policies discussed above because they unacceptably harm natural resources. I have quoted these laws, with citations, in my Purpose and Need section

above and will only briefly summarize these laws here.

The first law is the 1916 NPS Organic Act which requires that all national park lands (including PRNS and GGNRA) be administered "to conserve the scenery, natural and historic objects, and wild life ...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." (Emphasis added.)

The second law is in the Seashore legislation. It provides that the Seashore "shall be administered ... without impairment of its natural values, in a manner which provides for such recreational, educational, historic preservation, interpretation, and scientific research opportunities as are consistent with ... the maximum protection, restoration, and preservation of the natural environment "  
(Emphasis added.)

The third law is the GGNRA legislation which provides that the Secretary "shall preserve the recreation area, as far as possible, in its natural setting, and protect it from development and uses which would destroy the scenic beauty and natural character of the area."

While the word "unimpaired" does not appear in the GGNRA law, its language outlines the same need to "preserve" the park in an unimpaired state. Furthermore, the Organic Act, with its "unimpaired" language, applies to GGNRA.

As discussed above under "Purpose for and Need for Action," Park Service management policies also state that "the Park Service must leave park resources and values unimpaired."

The impairment of the pastoral zone began with the first Europeans and their cattle. Modern times and methods have exacerbated the conversion of what once was a natural condition to one that is the antithesis of a natural condition. By law, the current pastoral zone must be restored to the unimpaired state it was in before European man arrived.

The Service will also strive to ensure that park resources and values are passed on to future generations in a condition that is as good as, or better than, the conditions that exist today. In particular, the Service will strive to restore the integrity of park resources that have been damaged or compromised in the past.

NPS Management Policy § 1.4.7.2. (Emphasis added.)

Given the fact that all the ranching alternatives violate the three governing laws, none of these alternatives can be chosen. You must develop ranching alternatives that avoid harm to natural resources and restore those natural resources to the condition they were in before European man and his cattle arrived and completely altered the natural environment. If you choose not to do that, the only alternative you can choose without violating your statutory duty is Alternative F.

NPS' Ranching Overview (Pages 9-11)

Before discussing the individual alternatives, the DEIS provides an overview. Some statements in it are wrong.

Dairy Cow Water Needs

Dairy Cow Water Consumption Statement Is Wrong. On page 10 the statement that dairy cattle consume 15 to 25 gallons of water per day is incorrect. The milking string, which the DEIS states is about 60% to 80% of the "dairy cattle" on a dairy farm, consume 30 to 50 gallons/day for a 40 gallon per day average as opposed to the DEIS's alleged 20 gallons per day average. <https://www.dairyherd.com/article/drinking-water-dairy-cattle-part-1>



NPS needs to change this 20 gallons/day assumption to 40 gallons/day and use it in all further discussions, including calculating how much dairy cows eat, how much milk they produce and how much manure they produce. They're all related. A dairy cow consuming 40 gallons of water a day consumes much more forage a day and she produces much more milk and manure a day than a cow drinking only 20 gallons of water a day.

### Dairy Cow Food Requirements and Milk Output

**Dairy Cow Food Consumption.** First, a dairy cow needs 13 pounds a day of dry weight forage just to live. To produce any milk at all she needs much more than that. <https://www.dairyherd.com/article/management-key-dry-matter-intake>

**Dairy Cow Milk Production.** The average Holstein produces 75 pounds of milk a day. However, they can produce much more than that per day depending on adequate food and water. As discussed below, the record is 198 pounds of milk per day.

[http://www.holsteinusa.com/holstein breed/holstein101.html?tab=2#TabbedPanels 1](http://www.holsteinusa.com/holstein%20breed/holstein101.html?tab=2#TabbedPanels%201)

Rounding up the 75 pounds of milk a day to 80 pounds in order to make use of available data, to produce 80 pounds of milk a day a dairy cow needs not only the 13 pounds for maintenance, but an additional 35 pounds of dry weight forage for the 80 pounds of milk production for a total of 48 pounds of dry weight forage/day. <https://www.dairyherd.com/article/management-key-dry-matter-intake>

To produce 100 pounds of milk a day she needs not only the 13 pounds for maintenance, but an additional 43 pounds for the 100 pounds of milk production for a total of 56 pounds of dry weight forage/day. Ibid.

To produce 120 pounds of milk a day she again needs not only the 13 pounds for maintenance, but an additional 52 pounds for the 120 pounds of milk production for a total of 65 pounds of dry weight forage/ day. Id.

To produce 140 pounds of milk a day she again needs not only the 13 pounds for maintenance, but an additional 61 pounds for the 140 pounds of milk production for a total of 74 pounds of dry weight forage/ day. Id.

While 80 pounds of milk a day (and the other figures) may seem like a lot, the record is held by a Wisconsin Holstein cow who produced a 198-pound average of milk for an entire 365-day lactation period. <https://hoards.com/blog-1188-holstein-has-a-new-milk-production-record-holder.html>

### Dairy Cow Manure Output

**Dairy Cow Manure Production.** At page 10 there is a discussion of the amount of manure produced by dairy cows, but no figure is given as to how much manure a single dairy cow produces each day. A mature Holstein cow weighs 1500 pounds and produces about 123 pounds of manure a day or 44,895 pounds/ 22.45 tons per year (123lbs. X 365days =44,895 pounds). <http://livestocktrail.illinois.edu/dairynet/paperDisplay.cfm?ContentID=274> That's 12,300 pounds per day per 100 milk cows. All six dairies have permits for well over 100 milking cows with the smallest dairy at 200 milkers and the largest at 510 milkers. That's 24,600 (12.3 tons) to 62,730 pounds (31.365 tons) of manure to deal with every day of the year and it must remain stored in some way until the dry

season when it is spread on the park lands to pollute park waters and spread non native seeds and Johne's disease.

### Total Intake and Output of a Dairy Cow.

**Summary.** The average dairy cow drinks an average of 40 gallons of water per day. Water is 8.34 pounds per gallon. So, the average dairy cow drinks 334 pounds of water per day (and more in summer and when producing more than average milk quantity). She needs 48 pounds of dry weight forage to produce an average of 80 pounds of milk. So, she takes in a combined 382 pounds of water (or more) and food a day and produces a combined 203 pounds of milk and manure a day. Rounding those numbers, she takes in almost 400 pounds of water and food a

day and puts out 200 pounds of milk and manure a day. (The rest of the water intake is lost through various forms of evaporation.)

ALTERNATIVE A-NO ACTION. (Pages 12-25) This would be a continuation of the status quo. The DEIS discloses that ranching is occurring on 7,600 acres of land that were classified in the 1980 PRNS and GGNRA GMP as "Natural Environment" and "Natural Landscape" Zones, respectively, which made ranching an incompatible use in those areas and yet ranching has been going on there in violation of the classifications since at least 1980 and would continue as incompatible uses indefinitely.

It is incredible that a national park would fail to follow its own planning decisions made in a General Management Plan, especially when it involves 7,600 acres of national park resources or over 25% of the ranching lands.

Ranch Management (Page 11)

Animal Units.

This animal unit discussion regarding beef cows should have been with the discussion of dairy cows under "NPS Ranching Overview" above. I will discuss it here in the next few paragraphs.

NPS Grossly Underestimates Beef Cow Weight which Understates Forage Consumed.

On page 13 the number of animal units allowed under each beef lease is defined as a beef cow weighing 1000 pounds with or without a calf up to one year old. This is way below what cows weigh now. Beef and dairy cows have been getting substantially bigger as the years go by. In 2010 beef cows weighed 1350 pounds. <https://www.americancattlemen.com/articles/beef-cows-how-big-too-big> They are even bigger now.

In 2019, the average cow size across all breeds was 1,390 lbs., with less than 100 lbs. separating the heaviest and lightest breeds. Herefords came in heaviest, at 1,419 lbs., followed by Angus at 1,410 lbs., then Red Angus at 1,409 lbs. In the middle were Simmental cows at 1,404 lbs., and the lightest three breeds were Gelbvieh at 1,323 lbs., Limousin at 1,391 lbs. and Charolais at 1,371 lbs. <https://www.beefmagazine.com/cow-calf/relationship-between-cow-size-production>

NPS Grossly Underestimates Forage Consumed by Beef Cows By 30%.

"Of course, bigger cows need more nutrients. The neat thing is nutrient requirements don't go up in direct proportion to the size of the cow. They actually go up at a  $3/4$  powers ratio, or 75%, not one to one. So, the maintenance energy required by the 1,400-lb. cow is about 11% higher than that required by the 1,200-lb. cow, despite the fact that she is about 16% heavier" Olson explains. Ibid.

Applying these factors, an average 1,410 pound Angus cow (the main beef cow breed in the parks) weighs 41% more than a 1000 pound cow. Applying the 75% formula, the larger cow needs 30.25% (75% of 41%) more forage than the 1,000 pound cow. The Park Service is ignoring this by using beef cow weights that are decades old and in the process the grazing lands at Point Reyes are being significantly impaired in violation of the three non-impairment statutes.

Assuming, arguendo, that the Park Service is correct that a 1000 pound cow needs about 26 pounds of dry matter per day, applying the formula above means a 1410 pound Angus cow would need 30.25% more feed, or about 7.86 more pounds per day than the 26 pounds used by NPS.

This alone means NPS has been assuming grazing is removing 30% less forage than has been actually occurring. No wonder the park are so overgrazed. The Park Service should immediately reduce AUs by 30% to account for the larger cows.

Near the bottom of page 13 NPS states that "NPS may update AU equivalents based on best available data and would adopt any changes in industry standards, as appropriate to meet management goals and objectives." NPS has shown that it does not use best available data and this is a good example of that. Data that beef cows weigh well over 1,000 pounds has been available for decades.

Succession. (Page 13) There is a short discussion of succession. NPS may have authority to grant leases and issue permits for ranching, but there is no authority to give the ranchers any right of succession in real estate. It is also contrary to NPS' s obligation to do a General Management Plan every 15 years to look again at how lands should be managed and whether ranching is still appropriate.

Long term Leases. The same problem exists regarding leases of terms of 15 years or more. Leases should be no longer than 10 years to allow a new look at management in a new or updated GMP.

Appraisal Process. (Page 20) Appraisals should be based on appraised values for other comparable ranches in Marin and Sonoma counties. Several unsupportable rationales by NPS for lowering rents, such as the fact that, technically, a hiker could walk across a fenced pasture containing cows, possibly a bull, and manure all over the ground, if he or she wanted to do that.

Diversification. (Page 20) Diversification would not occur under Alternative A, except to the extent it is authorized under current leases and permits. Many leases and permits allow 10 cow AUs for sheep or other animals, like goats. With the 1:5 ratio conversion from cattle to sheep (1:7 for goats), 10 AUs allows 50 ewes (with their 50 lambs) for a total of 100 ewes and lambs (up to one year old).

Diversification will be further discussed under Alternative B. Aside from the question of whether there should be any cattle, allowing smaller animals will create many negative consequences for native wildlife, especially predators who will prey on these smaller animals. Current diversification should be ended. It creates too many conflicts with wildlife. The current operation where 2900 chickens graze on ranch lands (DEIS at 20) is especially egregious because it subjects many more species of predators to rancher retaliation, including small mammals like foxes, raccoons, skunks and weasels and even birds like eagles, hawks and owls.

Ranch Infrastructure. (Page 20)

Stream Crossings. (Page 20) Ranchers should not be trusted to construct stream crossings. NPS should them.

Fencing. (Page 21) All fencing should be wildlife-friendly starting with any maintenance work on any fence. NPS should be responsible for all fence building and repairs to ensure wildlife-friendly fences get built.

Pond Restoration. (Page 21) Good farming practice requires that all ponds be fenced with a water trough nearby connected to the pond by pipe. This is not done in the parks and it is a major cause of water pollution because when the cows go into the ponds to drink, they urinate and defecate. Many ponds are parts of water courses and the water percolates out of the ponds and flows downgrade in the watercourse. This pollutes the watercourse with fecal material and high levels of nutrients like nitrogen which causes vegetation in the waters to bloom uncontrollably and it leads to eutrophication. It also spreads Johne's disease which many cows in the parks have.

Waterway Stabilization. (Page 21) This work should be done by NPS or an NPS contractor, not a rancher, to ensure it is done per applicable specifications.

VEGETATION MANAGEMENT. (Page 22)

Mowing and Integrated Pest Management. (Page 22) Mowing to control native shrubs should never be allowed. Native shrubs are held in check by cattle, and elk where they exist. Native shrubs provide important food and cover for a myriad of wildlife species. Cows were removed from the Tomales Point Elk Reserve (where elk are held captive behind an 8-foot tall woven-wire fence) in 1980 and the brush there has not increased because the elk are there.

## OTHER ACTIVITIES. (Page 22)

Forage Production. (Page 22) Silage growing should be prohibited because it invariably leads to killing birds. That should be reason enough for you to not allow it. Plus, NPS has statutory duties to protect, restore and preserve natural resources, including birds. Furthermore, it violates the Migratory Bird Treaty Act and, where protected species are involved, it violates the Endangered Species Act.

Finally, under your three statutes you are supposed to be trying to preserve and restore the native coastal prairie, not the reverse.

If it is allowed it should only be conducted after the bird nesting season is over in September. This is recommended by both Point Blue in its Point Reyes Silage Study and by your 2019 Grazing Plan and 2019 NRCA.

Importation of Hay. NPS should require certified weed-free hay to the extent any hay imports are allowed. Even your 2019 Grazing Plan and NRCA, prepared for you by range scientists, recommends that. Uncertified hay imports are probably the greatest source of weed seeds in the seashore.

Manure and Nutrient Management. Manure management is primarily a dairy problem. Milk cows are largely confined to small areas and their manure is collected and stored, usually in manure ponds, but also on land near feed troughs, to be spread on ranch lands in dry months. In addition to fouling water courses, manure spreading also spreads weed seeds that primarily come into the two parks mixed in the hay which is hauled in by the hundreds of eighteen-wheeler trucks that come into the parks each year for the dairy ranchers and some beef ranchers. It also spreads Johne's disease. You should also require that all dairy herds be made Johne's free by a long-term program of testing and culling cows.

## RANCH COMPLEX MANAGEMENT (Page 23)

### ELK MANAGEMENT. (Pages 24-25)

Hazing is unlawful. (Page 25) The DEIS states that "[u]nder Alternative A, actions to reduce the impacts of elk on ranches would continue to include hazing, habitat enhancements and fence repairs." Management priorities are upside down. Your three laws, which put natural resource protection first, prohibit hazing of elk. Elk are the Park Service's first priority. Ranching is not a priority, period.

Allocate forage to elk. After determining the total amount of forage on all ranches used by elk, first allocate how much forage the elk need and then allocate the rest to livestock. Even your 2019 Grazing Plan and NRCA recommend that forage be allocated to elk.

Cattle fencing in the parks is unlawful because it is harmful to wildlife and NPS has a duty to protect wildlife. With respect to fence repairs, the reason fences in elk areas are occasionally broken by elk is because the fences are too high and otherwise not wildlife-friendly. Wildlife-friendly fences are a three wire design with the top wire no more than 38" high, so animals can clear it; the middle wire is at least 12" below the top wire to prevent "scissoring" of jumping elk and deer; and the bottom wire should be smooth, not barbed, and at least 16" above ground to allow deer fawns and elk calves to go under it. NPS should be responsible for all ranch boundary fencing because the ranchers will not want to spend the time and money to do it and want fencing that is difficult for elk to cross, not easy. These specifications are used by BLM and the Forest Service.

### Disease testing and reporting. (Page 25)

Testing Elk for Johne's disease violates the three statutes requiring the protection of natural resources to the extent it involves killing elk to get tissue samples. The elk brought to the seashore in 1978 did not have Johne's disease (pers. comm. with Joe Hobbs, Cal. F&W). They contracted the disease when they arrived at Pierce Point Ranch (now the Tomales Point Elk Reserve). Instead of constantly studying the elk for Johne's disease, NPS has

an obligation under the three statutes to get rid of John's disease in the cattle by testing and culling or ordering the removal of any dairy herd where the disease exists. In 1979, half of the dairy herds in the seashore tested positive for John's. NPS has done nothing in the 40 years since the dairy cows were tested to deal with John's disease. John's is impairing the natural resources of the seashore and NPS has an obligation under the statutes to remediate the problem by regularly testing the livestock and culling those animals that have the disease.

#### ALTERNATIVE B-NPS PREFERRED ALTERNATIVE (Pages 25-42)

##### General Description and Management Zoning (Page 25)

Alternative B creates a management zone concept for each ranch called the Ranchland Zone. This approach divides each ranch into three parts: (1) a "range zone" of approximately 66% of the ranch which would be managed like all ranch lands are now managed, (2) a "pasture zone" of approximately 33% of the ranch which would allow many more uses, such as diversification, and (3) a ranch core zone of approximately 1% which would allow even more uses. Each ranch would be operated under a ranch operating agreement (ROA). The DEIS states NPS would work closely with local ag organizations and others to discuss issues related to ranching. NPS needs to be sure that it is guided by the three statutes above and not anything to the contrary. Alternative B would also provide a population threshold for the Drakes Beach elk herd. Killing elk to accommodate ranchers when NPS has a statutory duty to protect elk is in violation of the three statutes.

##### Preservation of Area's Resources (page 26)

NPS has created a Table 2 to outline the detailed management strategies that NPS would adopt to achieve the desired conditions for the preservation of park resources. However, generally, everything NPS says it will do it has failed to do since it acquired these ranch lands. The Seashore's common response as to why it hasn't done many things the public has inquired about is that it doesn't have the funds to do what the public has inquired about. I asked in writing for the last completed PRNS budget a couple of years ago and said that if I didn't get a reply within 30 days, I would assume the park has not done one. I never got a reply. NPS law requires each park to do an annual budget every year and the public is entitled to any national park budget by just asking. 54 U.S.C. § 100503 (b).

##### Ranch Management (p. 35)

Subzone framework. (Page 35) The subzone framework is just an artifice to get people to think NPS is going to be tougher in protecting natural resources when in fact it is a way to more intensively use 34% of the ranching area. One purpose is to allow ranchers to use park lands for more intensive uses than just cattle grazing, such as diversification.

Ranch Operating Agreements. (Page 36) A draft of every Ranch Operating Agreement (ROP) should be provided for public review and should normally be the subject of an EA under NEPA.

Animal Units. (Page 36) See comments under Alternative A.

Succession. (Page 37) See comments under Succession under Alternative 1 above.

Appraisal Process. (Page 37) See comments under Appraisal Process under Alternative 1 above.

Diversification. (Page 37) No diversification should be allowed.

Alternative B will allow any rancher to have up to 10 animal units (AUs) of sheep, goats or chickens in the pasture zone (34% of a ranch) and/or the ranch core (1% of a ranch). One animal unit is equal to 1 cow or 5 sheep or 7 goats. Thus, a rancher could have 50 ewes (10 AUs x 5) and 50 lambs. It also will allow 500 chickens in the pasture or in the ranch core. In addition, pigs are allowed in the ranch core as is row crop growing. So, in the pasture zone (34% of each ranch), a lessee can have 100 sheep (including lambs) and 500 free-roaming chickens, in addition to

however many cattle animals allowed under the lease (minus 10 cow AUs which were converted to the 50 sheep and 50 lambs).

Livestock guardian dogs (LGDs) would presumably be used to protect these animals from predators, such as bald eagles, red-tailed hawks, owls, mountain lions, bobcats, coyotes, foxes, raccoons, skunks and weasels.

No diversification should be allowed. It will subject many more predators to retaliation by ranchers and fights and possible death due to livestock guardian dogs. Livestock guardian dogs have been known to attack and kill predators.

Interestingly, just the presence of a guardian dog keeps some predators away. The dogs use vocal intimidation such as barking, and aggressive behavior to chase off threats, and if that doesn't work, they may attack or fight with a predator. And guardian dogs don't just stand around waiting for threats to show up, either - they often actively look for predators to either catch or run off, and have even been known to lure coyotes to a source of food in order to catch them.

[https://healthypets.mercola.com/sites/healthypets/archive/2018/06/15/guardian\\_dogs.aspx](https://healthypets.mercola.com/sites/healthypets/archive/2018/06/15/guardian_dogs.aspx)

Finally, if restrictive fencing is used with or without LGDs, it would make it much more difficult for predators to use former habitat and to move within their territories.

Vegetation management. (Page 39).

The DEIS states that vegetation management would follow Marin County Resource Conservation District's Permit Coordination Program. NPS cannot do that legally. NPS must follow its three laws and its planning policies as discussed above, at least where there is a conflict with other laws or policies.

With respect to seeding, it can only be done using seeds native to the coastal prairie that existed before European man arrived.

Forage production. (Page 39)

Silage growing should be stopped. To the extent it is allowed, it must be done in a way that would be consistent with the three statutes quoted above and NPS policy. Silage seeding should only be done using seeds native to the coastal prairie that existed before European man arrived. Furthermore, silage mowing should only be done after bird nesting season to be consistent with the three laws discussed above, the Migratory Bird Treaty Act and the Endangered Species Act to the extent applicable (and the 2019 Grazing Plan and the 2019 NRCA). With respect to "mowing and IPM," mowing and IPM treatment of native shrubs, like native plants in general, should be prohibited by NPS because of the three statutes and NPS policy.

Manure and nutrient management (Page 39)

Manure from the dairies, and even the beef ranches, is getting into the waters of PRNS and GGNRA constantly. Spreading manure is one way. It should be stopped unless and until it is clear that no manure is getting into the waters of each park. Furthermore, NPS is required to comply with the three laws quoted at the beginning of this comment letter. In addition to law violations regarding manure getting into the waters of the two parks, the manure is tainted with two things that make putting the manure on the ground prohibited by those three laws. First, some or all of the dairy herds are infected with Johne's disease and the disease is in the manure that is sprayed on the pastures. Furthermore, non-native, invasive and noxious weeds seeds are sprayed on the fields as part of the manure spraying. The seeds are first consumed by the cows and they excrete the seeds as part of their manure. The cows get the seeds by eating trucked-in hay and by eating any silage grown on site using non-native seeds.

Elk Management. (Page 40)

Elk numbers in the Drakes Beach herd would be kept at current 120 or so animals and this will require the killing of about 10 to 15 animals per year. This is to keep the "population level consistent with authorized ranching operations." Page 41.

This is contrary to statutory seashore management requirements. Ranching is only allowable under the three laws when it doesn't negatively affect natural resources, like elk. The Park Service is looking at the elk management as though ranching is the highest management duty when caring for elk (all other natural resources) is its highest duty.

**ALTERNATIVE C - RANCHERS' PREFERRED ALTERNATIVE (Pages 42-42)** The only difference between this alternative and Alternative B is that all the Drakes Beach elk would be shot. This is the most blatant violation of the three laws that protect natural resources in these two parks and which NPS must comply with.

**ALTERNATIVE D-REMOVE BEEF CATTLE ON 7,500 ACRES (pp.43-44)**

Beef ranching would be terminated on 7500 acres. These lands have no residences. This would reduce beef ranching from 2400 animals to 1700 animals and have no effect on dairy farming. Management zoning would be used but no diversification would be allowed in the pasture zone, unlike Alternatives B and C.

The settlement agreement did not specify where ranching would be reduced. The Park Service used only one factor in determining where to reduce ranching, namely stopping ranching where it would have the least effect on ranchers. Under its three statutes that require NPS to protect natural resources as the overarching duty, it paid no attention in its decision to protection of natural resources. One obvious choice would have been to place emphasis on removing ranching where it is having the biggest negative effect on natural resources. For example, the Park Service should have considered removing dairy ranching in the Drakes Beach area where the Drakes Beach elk herd lives and the biggest conflicts between ranching and elk exist. Eliminating ranching on the C, D and E Ranches would have been very important from a protection of natural resources standpoint (primarily elk) and would only really have affected one ranch family, the C Ranch family, which has the smallest dairy operation at Point Reyes. No ranchers live at the D Ranch and the E Ranch is just additional housing for employees who work at the A Ranch. Mobile homes could be placed at the A Ranch.

**ALTERNATIVE E - REPLACE DAIRY COWS WITH BEEF COWS. (pp.**

44-46) The six dairies would cease operations. They could swap dairy cows for beef cows on a less than one to one basis. Management zoning would be used. With elimination of dairy cows, manure spreading and forage/silage production would cease in the pasture zones of the dairy ranches, (but silage growing would continue on the G and H beef Ranches). No diversification would be allowed in the pastures or even the ranch cores, including ending existing chicken and horse boarding operations (Home/Murphy Ranch). Elk would not be managed because it's not necessary for beef cattle, except they would be managed if they move outside PRNS. While removing dairying from the seashore would be a big step in the right direction, it still leaves beef ranching on 19,000 acres of the two parks and that would still greatly impair natural resources.

**ALTERNATIVE F - REMOVE RANCHING; RESTORE NATURAL**

**RESOURCES. (pp. 46-48)** All ranching would cease. No management zoning. No elk limits unless they get out to GGNRA or beyond. Visitor use would increase.

This is the only alternative that does not violate the three statutes that govern Park Service management of the two parks. It is incredible that it took a lawsuit for the Park Service to consider this alternative. It is noteworthy that there is really no discussion of whether the Park Service would act in any way to return the parks to their natural condition under this alternative.

**ALTERNATIVES CONSIDERED, BUT DISMISSED FROM FURTHER ANALYSIS**

This section contains some odd characterizations of things as though they were possible alternatives. Only two of

those listed could be alternatives in this DEIS, namely converting all ranching to dairy ranching and closing the ranches that drain into Drakes Estero. The rest are not proper alternatives and therefore do not belong here. One of those non-alternatives requires further discussion.

Ignoring the three laws that require the Park Service to preserve natural resources above all else won't make them go away. Neither will arguing that they don't say what they say. In the section of the DEIS called "Alternatives Considered, But Dismissed From Further Analysis," the Park Service states as follows:

Commenters suggested NPS should manage all park lands solely for the protection, restoration, and preservation of natural resources. In addition to managing park lands for the protection of natural resources, NPS also must manage cultural resources and provide for visitor use and enjoyment in a manner consistent with applicable legal requirements. As a result, management decisions cannot solely be based on impacts to natural resources. This approach was dismissed from further analysis because it would not address impacts on other NPS resources and values that NPS is mandated to consider.

DEIS, 59 (Emphasis added.).

This statement shows NPS is unwilling to follow the clear language of the three statutes quoted above. It is also wrong to treat these laws as though they can be considered as alternatives which the Park Service is free to reject. These laws apply to all the alternatives and everything else the Park Service does in managing the natural resources in these two parks.

It is also in disregard of the following statement of NPS management policy.

#### APPLICABLE NPS POLICY

NPS management policies provide as follows:

##### 1.4.4 The Prohibition on Impairment of Park Resources and Values

While Congress has given the Service the management discretion to allow impacts within parks, that discretion is limited by the statutory requirement (generally enforceable by the federal courts) that the Park Service must leave park resources and values unimpaired unless a particular law directly and specifically provides otherwise. This, the cornerstone of the Organic Act, establishes the primary responsibility of the National Park Service. It ensures that park resources and values will continue to exist in a condition that will allow the American people to have present and future opportunities for enjoyment of them.

The impairment of park resources and values may not be allowed by the Service unless directly and specifically provided for by legislation or by the proclamation establishing the park. The relevant legislation or proclamation must provide explicitly (not by implication or inference) for the activity, in terms that keep the Service from having the authority to manage the activity so as to avoid the impairment.

Management Policies of 2006, 1.4.4. (Emphasis added.)

#### MORE ALTERNATIVES NEEDED.

As explained above, NPS needs to come up with more alternatives because the five it has created all fail to meet the Secretary's statutory obligation to manage the ranching area in an unimpaired state and in a manner that achieves the "the maximum protection, restoration, and preservation of the natural environment " As such, they can't be considered as alternatives.

#### CHAPTER 3: AFFECTED/EXISTING ENVIRONMENT (Pages 65-97)

As stated above, the Park Service has a duty to prevent the impairment of the natural resources of these parks and



to protect and even restore the lands to the condition they were in before they were altered by European man. The Park Service has failed to carry out this duty. The natural resources of the two parks is a far cry from the condition they were in when they were in a natural state when the soil was covered in coastal prairie grasses and forbs intermixed with shrubs, like coyote brush, and the prairie was roamed not only by tule elk, but also pronghorns, grizzly bears, black bears and wolves.

Cattle grazing causes significant impacts to the environment including, but not limited to, compression of soil due to the heavy weight of cattle; erosion of soil and faster runoff of rainwater due to that compression (and overgrazing), especially in hilly areas where cattle make deep trails or gullies; damage to plant life, including threatened and endangered species, by overgrazing and trampling; conversion of native plants to non-native plants; damage to water quality; damage to air quality and concomitant increase in global warming; and harm to all forms of wildlife, including threatened and endangered species. As for wildlife, some of the ways ranching and cattle harm or kill wildlife are as follows: overgrazing; mowing brush, such as native coyote brush, because ranchers would rather have all the vegetation be grass for maximum cattle feed whereas brush provides food and habitat for all kinds of birds and mammals; using fencing that is not "wildlife friendly;" hazing/harassing elk when they are on park lands that NPS has unlawfully dedicated to commercial beef and milk production; pollution of streams and bays (while the pollution of Tomales Bay and Drakes Bay due to PRNS and GGNRA ranching is well known, there are other areas in the two parks that are heavily polluted from ranching that aren't as well known, such as Kehoe Creek discussed further below); and the mowing of silage in the spring which kills any ground-nesting or near-ground-nesting birds and small and even larger mammals, such as deer fawns.

Furthermore, most of the cattle in the seashore are dairy cows. Dairy farming has much greater impacts on the environment than beef cattle ranching, including, but not limited to, greater forage consumption, greater water consumption, greater manure production (and related greater collection and disposal problems), greater methane gas production, greater water pollution, greater trampling of vegetation and soils due to the fact that milk cows tend to not go any farther than necessary to graze given the need to return to the milk barn two or three times (round trips) per day, and greater erosion due to cattle making those two to three round trips per day to and from the milk barn, especially when they travel through hilly areas and create deeply rutted trails on slopes; disposing of manure by spraying it on pastures which can infect elk and deer with Johne's disease; over-managing elk by constantly testing them for Johne's disease while never doing anything about the fact that some cattle in the Seashore (and probably GGNRA) have always had Johne's since well before the first elk were reintroduced into the Seashore in 1978 (NPS should establish a rigorous program to eliminate Johne's disease in the cattle herds, including testing and culling. See <https://johnes.org/general/control.html>); needing supplemental feed over and above what the land can provide which involved hundreds of tractor-trailer deliveries of hay which has mixed in with it non-native, invasive and, sometimes, noxious plants/seeds.

On most federal public lands grazing occurs for only a portion of the year and is limited to beef cattle. The rest of the year the cattle are on private ranch lands. In PRNS and GGNRA grazing is year-round. Plus, the ranch complexes themselves are on park lands and they can occupy several acres.

The DEIS Fails to Adequately Assess Baseline Conditions and Trends.

Baseline (current) information and long-term trend data are essential in a Draft EIS as part of the Affected Environment discussion to measure changes (impacts), and they are necessary to identify and assess alternatives which are intended to remedy those past problems and are necessary for NPS to set standards for each environmental indicator that mitigation measures must then meet.

NPS has not sufficiently established baseline data or long-term trend data for the DEIS and thus is not considering all relevant factors before determining that the actions will have no significant impact. Baseline conditions are necessary to "determine what effect the project will have on the environment" and thus to comply with the requirements of NEPA. *Great Basin Research Watch v. Bureau of Land Management*, 844 F.3d 1095, 1101 (9th Cir. 2016).

Recognizing that NPS had always had an aversion to doing scientific studies throughout its history, in 1998

Congress enacted the National Parks Omnibus Management Act, 54 U.S.C. §§ 100701-100707, which requires NPS to undertake a program of inventorying and monitoring of System resources to establish baseline information and to provide information on the long-term trends in the condition of System resources and to use these studies to make better informed decisions based on them. (The law followed on the heels of former NPS employee Richard Sellars' 1997 book entitled "Preserving Nature in the National Parks." The book documented how NPS had, throughout its existence, avoided the study of natural resources and the protection of them based on scientific studies.) The 1998 law provides in pertinent part as follows:

#### Subchapter I-System Resource Inventory and Management

§ 100701. Protection, interpretation, and research in System Recognizing the ever increasing societal pressures being placed upon America's unique natural and cultural resources contained in the System, the Secretary shall continually improve the ability of the Service to provide state-of-the-art management, protection, and interpretation of, and research on, the resources of the System.

#### § 100702. Research mandate

The Secretary shall ensure that management of System units is enhanced by the availability and utilization of a broad program of the highest quality science and information.

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#### 100704. Inventory and monitoring program

The Secretary shall undertake a program of inventorying and monitoring of System resources to establish baseline information and to provide information on the long-term trends in condition of System resources. The monitoring program shall be developed in cooperation with other Federal monitoring and information collection efforts to ensure a cost-effective approach.

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#### § 100706. Integration of study results into management decisions

The Secretary shall take such measures as are necessary to ensure the full and proper utilization of the results of scientific study for System unit management decisions. In each case in which an action undertaken by the Service may cause a significant adverse effect on a System unit resource, the administrative record shall reflect the manner in which System unit resource studies have been considered. The trend in the condition of resources of the System shall be a significant factor in the annual performance evaluation of each superintendent of a System unit.

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54 U.S.C. §§ 100701 - 100707. (Emphasis added.)

Baseline conditions and long-term trend data must provide a reasonable basis for determining the effect of the activities authorized by the agency, using the best available scientific information. The Draft EIS is wholly inadequate in this regard.

Soils. (Pages 65-67) The DEIS states: "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." Page 65. (Emphasis added.) This is a gross understatement and provides no baseline describing the current condition or long term trend data. "Cattle trailing results in erosion of the topsoil along pathways between areas ...." Page 66. This is so general as to be worthless.

The DEIS does admit that 56% of the soils have moderate to very severe erosion potential and 94% have moderate to high compaction potential.

Below are some photographs depicting some cattle trails which are caused by cattle walking in areas that are too steep to use. These trails cause severe erosion, which is greatly exacerbated by rainwater runoff and results in

serious pollution in receiving waters. There is no discussion of how severe the cattle trailing problem is or what the long-term trend is.

Below is a photo I took showing severe erosion from cattle trailing on the left side of Pierce Point Road on the J Ranch. These trails have grown into deep gullies.

(photo)

Below is a photo I took showing further trailing on the J Ranch. These dairy cow trails are causing soil loss and severe siltation and pollution from manure washing into Tomales Bay, which is at the bottom of these two steep areas.

(photo)

Below is a photo I took evidencing severe trailing or gullying and consequent erosion on the south/left side of Sir Francis Drake Blvd. on the E Ranch.

(photo)

Below is a photo I took evidencing severe trailing and consequent erosion on the north/right side of Sir Francis Drake Blvd. on the E Ranch. These two eroded areas drain into the Pacific Ocean just a short distance to the west of the areas depicted in the photos.

(photo)

All four of these photos were taken along roads. Trailing or gullying and consequent erosion occur when cattle walk on slopes. Such slopes exist all over hilly PRNS and GGNRA and, presumably, such trailing also exists all over PRNS and GGNRA, not just close to these two roads where the trails and gullies were easy to see and photograph from the road.

These trails and the many others throughout PRNS and GGNRA are significant environmental impacts that are not disclosed or discussed in any meaningful way, let alone discussed in terms of long-term trends. This damage is also prohibited by NPS's three statutes that require NPS to manage these lands in an unimpaired state and to protect, restore and preserve them. NPS has not done anything about them because they are the only routes to grazing areas in the hilly PRNS and closing them off and restoring them would cut off access to grazing lands.

#### Water Resources.

There is far too much water pollution occurring at Point Reyes and GGNRA due to cattle, especially from dairy operations. Leaks from farm septic tanks may also be contributing to the problem. The DEIS talks about some things that have been done to reduce polluting of various water courses, but the statements are too general and vague and don't purport to quantify the extent of the problem or discuss trends.

For example, with respect to Kehoe Creek, the DEIS states:

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

DEIS at 69. (Emphasis added.)

The I Ranch (McClure) loafing barn was built in 2004, but the Pawley and Lay report reporting on severe pollution was done in 2013. 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. No date is given for the improvements to the J Ranch loafing barn, but it is obvious as the photos below show, that manure is still getting into Kehoe Creek.

And stapling some Best Management Practices (BMPs) to a ranch permit isn't going to get anything done and more than they have in the past.

The Park Service's own 2013 Coastal Watersheds Assessment done by its Denver Service Center shows that Kehoe Creek and other aquatic habitats have been at severe risk for years. To quote from part of the report dealing with water quality:

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  $\mu\text{Siem}$  to support diverse aquatic life (Behar 1997).

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

Pawley, A. and M. Lay. 2013. Coastal Watershed Assessment for Golden Gate National Recreation Area and Point Reyes National Seashore. Natural Resource Report NPS/PWR/NRR-2013/641. National Park Service, Fort Collins, Colorado. Page 137. (Emphasis added.) <https://irma.nps.gov/DataStore/DownloadFile/471087>

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 were severely polluted as of 2013 (and presumably long before that). Three of these listed dairies plus the K Ranch (beef) drain into Kehoe Creek. The Assessment and other sources also discuss other areas of Point Reyes and GGNRA that are suffering serious pollution for ranching, including Abbott's Lagoon, Drakes Bay, Tamales Bay and Olema Creek.

Based on the 2013 Assessment, Kehoe Creek is one of the most polluted, if not the most polluted, watercourse in PRNS. This is consistent with my own observations.

Kehoe Creek is comprised of a north fork and a south fork. The north fork begins on the J (Kehoe) Ranch and, possibly, the K (Evans) Ranch.

The south fork begins on the L (Mendoza) Ranch. The pond in the photo I took below is located on the L Ranch at the headwaters of the South Fork of Kehoe Creek. L Ranch cows walk into this pond every day and urinate and defecate in it and then drink the water from it. Here is a photo of a dairy cow defecating in this pond on the L Ranch. If any of the cows in this dairy herd has Johne's disease, the disease can survive for a year and travels with the water downgrade to possibly infect any wild or domestic ungulates downstream that drink the water.

All the farm ponds at PRNS and GGNRA should be fenced. 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 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. 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 many ponds, the pond shown above was created by excavating a hole below a seep or spring and pushing the soil down elevation to form a dam which temporarily retains the water 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 down elevation from it. Below is a photo I took of that second pond.

This lower pond is completely covered by algae or some plant material due to excessive nutrients from manure. The pond water ultimately flows via the surface and/or below surface to Kehoe Creek and then Kehoe Pond at the Kehoe Beach parking lot and then to Kehoe Beach and ultimately, when there are high flows from winter rains, into the Pacific Ocean.

Here is a photo I took of two beef cows from the K Ranch eating aquatic reeds in Kehoe Creek. The creek is completely choked by the reeds. It should be open water or mostly open water. The reeds are choking the creek because of excessive nutrients from manure which is in the entire creek watershed. I should point out that there is a barbed wire fence on the far side of the creek. However, I have seen beef cows in the creek numerous times. The fence is either not adequate to prevent cattle from getting past it or is not adequately maintained. Furthermore, the area above the fence line is relatively steep and cattle that graze on that large slope drop manure that eventually gets washed into the creek. The fence should be at the top of that slope, not at the creek edge, to keep the manure from getting into the creek. However, that would remove a significant amount of grazing area from what the K Ranch currently grazes and for that reason, apparently, the fence remains close to the creek.

Below is a photo I took of the Kehoe Pond. This is where the north and south forks of Kehoe Creek meet. 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.

(photo)

The water then flows under the road (via culvert and, during heavy rains, over the surface of the road) at the Kehoe Beach parking lot and, ultimately, into the ocean during the wetter times of the year. From the road to the beach it is also almost completely overgrown with more aquatic vegetation.

As stated above, there is far too much water pollution occurring at Point Reyes and GGNRA due to cattle. NPS hasn't done anything to describe to the reader the condition of the creek today, except to say it's very polluted. What is the long term trend? Is it better or worse than in 2013? How can the reader contrast the condition of the creek today compared to what the alternatives would do to it? The Park Service has never done anything about the pollution and it never will, beyond stapling Best Management Practices to the permits.

## Vegetation, Including Listed Species

The areas that cattle graze on are overgrazed. This is because, in part, NPS is assuming the average size of a cow is 1,000 pounds, but as explained above under the beginning of Alternatives Section, black angus cows (the most common beef cows in the two parks today) weigh 1410 pounds.

"Of course, bigger cows need more nutrients. The neat thing is nutrient requirements don't go up in direct proportion to the size of the cow. They actually go up at a  $3/4$  powers ratio, or 75%, not one to one. So, the maintenance energy required by the 1,400-lb. cow is about 11% higher than that required by the 1,200-lb. cow, despite the fact that she is about 16% heavier" Olson explains. <https://www.beefmagazine.com/cow-calf/relationship-between-cow-size-production>

Applying these factors, an average 1,410 pound Angus cow weighs 41% more than a 1000 pound cow. Applying the 75% formula, the larger cow needs 30.25% more forage than the 1,000 pound cow. The Park Service is ignoring this by using weights that are decades old and in the process the grazing lands at Point Reyes are being seriously overgrazed.

Assuming, arguendo, that the Park Service is correct that a 1,000 pound cow needs about 26 pounds of dry matter per day, applying the formula above means a 1410 pound Angus cow would need 30.25% more feed, or about 7.86 more pounds per day.

This alone means NPS has been assuming grazing is removing 30% less forage than has been occurring. No wonder the park looks so overgrazed. The Park Service should immediately reduce AUs by 30% to account for the larger cows.

How does a rancher make up for the fact that his cows have overgrazed? He imports as much hay as he needs. Unfortunately, NPS has never required the rancher to buy certified weed-free hay. It costs more, but it keeps non-native and invasive weeds and their seeds out of the parks.

NPS's 2019 Natural Resource Condition Assessment (NRCA) concludes that the Park Service at Point Reyes National Seashore has a lot of catching up to do with

simply having a current baseline vegetation map that can be used for future monitoring of trends:

The ecological communities discussed in this assessment included coastal dunes, forests, and grasslands. Assessment of these communities, as well as focal resources such as rare plants, would benefit from an updated vegetation map for the park. The detailed vegetation map for PORE is an indispensable tool for management and research. However, it is more than two decades old. Given that we are experiencing an era of accelerated ecological dynamics, the vegetation map needs to be updated as often as possible to understand ongoing shifts in the vegetation.

NRCA, page 269. And again:

[Point Reyes National Seashore] faces some significant challenges in the coming decades including climate change, exotic pests and pathogens, the presence of non-native species, and habitat loss due to human activity. In addition, although park staff have gathered a considerable amount of information regarding natural resources, there are still many significant gaps in the existing data for natural resources and stressors. NPS resource managers need to establish and continue comprehensive monitoring projects in order to ensure that management strategies can be implemented in a timely and effective manner, so that these challenges do not result in the degradation of these valuable natural resources.

Ibid. (emphasis added).

The Park needs to establish baseline conditions in order to understand how ranching and livestock grazing are

impacting sensitive resources. This has not been done yet and equates to a serious and significant gap in the EIS.

Accurate and up-to-date monitoring is fundamental to ensuring the effectiveness of monitoring commitments, meeting legal and permitting requirements, and identifying trends. Under NEPA a federal agency has a continuing duty to ensure

that new information about the environmental impact of its proposed actions is taken into account. The Park failed to analyze the significant impacts of cattle ranching and other proposed actions on a degraded landscape and does not have a proper baseline to carry out an accurate monitoring program to ensure that decisions do not further harm the environment. There are so many data gaps with coastal grassland baseline information that I cannot see how the park can justify any management alternative scientifically, in their Draft EIS.

Wildlife, Including Listed Species (Page 77)

Mammals. (Page 78)

The DEIS states that "[m]ost species use grasslands, shrublands, or pastures to complete a portion of their life history and could be affected by ranching, through disturbance, competition for resources, and habitat alteration. Some species are adaptable to agriculture (e.g., coyotes and raccoons) while others are not." Page 78. (Emphasis added.) This is a typical very general statement in the DEIS. It is neither a baseline statement nor a long-term trend statement. For all of the topics below, what is the baseline and what is the long-term trend?

Here are some facts to keep in mind about mammals living in the ranching area today.

Silage Growing on 1,000 acres. Silage, by definition, is vegetation mowed in the spring when it is still green. Some mammals use the silage fields, including for giving birth to and hiding their young. While a lot of small mammals are chopped up by silage mowers, even large mammals die from silage mowers. In the film "The Shame of Point Reyes" there is footage of a coyote grabbing a deer fawn whose body had been sliced up by a silage mower.

Manure spreading on 2,500 acres. Some manure is contaminated with Johne's disease. It is a deadly bacteria that affects the small intestine and prevents the absorption of nutrients. It can lie dormant on the ground for a year and any other ruminant that eats the grass it is on will become infected.

Brush Cutting. Ranchers like to remove brush to replace it with grass for their cattle, but the most common brush species at Point Reyes is coyote brush which is a native plant that provides important food, cover and nesting habitat for all sorts of mammals and birds.

Diversification. While diversification would expand exponentially under Alternatives A and B, there is some diversification now. Many of the ranchers' leases/permits have a provision allowing up to 10 cow animal units (AUs) of some other species, such as sheep. A sheep is assumed to be 1/5 the size of a cow so 10 cow AUs equals 50 ewes. Each ewe can produce a lamb each year which brings the total up to 100 ewes and lambs for each ranch having that allowed personal, non-commercial use. There are 11 or so leases/permits with that provision so in addition to all the cattle allowed in the park, the ranchers could have up to 550 ewes and 550 lambs at any one time. These ewes and lambs are all targets for the medium to large mammalian predators in the park, such as mountain lions, bobcats, coyotes, badgers, foxes, etc.

This makes the predators targets for the ranchers. Ranchers have three legal choices to deal with the predators. They can use livestock guardian dogs (LGDs), wire mesh fencing instead of barbed wire fencing, and/or put them in a barn at night. (Illegal methods include shooting, trapping and poisoning.) LGDs sometimes kill the predators that don't leave when the dog approaches as discussed in the Alternatives section under Alternative B.

Fencing. Fencing can kill or injure wildlife. It is used all over the ranching area for holding cattle and blocking elk or other wildlife from entering a ranch area. Wildlife-friendly fencing methods exist, but none of the ranchers use it and NPS has never seen fit to make them use it.

## Birds. (Page 78)

The DEIS states: "Many birds use the planning area ... Ground-nesting species, could be susceptible to impacts from cattle grazing and vegetation management (e.g., plowing and harvesting) ... " That's not a very forthcoming description of how ranching is harming birds.

Silage. See silage discussion under mammals. Many species of birds nest in the silage fields in the spring and the nestlings and some adults are chopped up when the mower passes over them. Allowing silage growing when it kills wildlife is in violation of the three statutes.

Brush Cutting. Some birds nest in brush and thus lose nesting habitat due to brush cutting. These lands should not be managed for what is best for making money in ranching but for what is best for avoiding any impairment of natural resources and for protecting, preserving and restoring the current natural environment to a natural environment.

According to the DEIS: "Additionally, agricultural activities ... attract some birds ... such as common ravens ... Ravens are nest predators of the federally threatened western snowy plover, which nests on beaches adjacent to the planning area ...." Pages 78-79. Again, as with everything else, what is the baseline for the snowy plovers and the ravens and what is the long-term trend?

Diversification. In addition to the discussion on diversification and mammals, one rancher (D Rogers Ranch) is allowed 3 cows worth of AUs for chickens. His lease/permit states that one cow AU is equal to 250 laying hens or 455 broilers.

So, that ranch can have out on the pastures 750 laying chickens or 1365 broilers. These are not only targets of the mammalian predators listed previously but also small mammalian predators such as raccoons, skunks and weasels. They are also the targets of avian predators such as eagles, hawks and owls.

Fencing. While it is commonly known that fencing can kill wild ungulates, fencing also kills or injures wild birds that who do not see the barbed wires as they fly low over areas with fencing.

## Tule Elk. (Page 81)

The story of the reintroduction of tule elk into Point Reyes is a sad one. They were opposed from the beginning by the ranching community. A lawsuit was filed by the rancher who held a permit for ranching at Pierce Point Ranch. I was involved in defending the lawsuit. The suit was dismissed and 10 elk finally arrived. They were confined for many months at Pierce Point while the rancher gathered his cows and left. During that period of confinement some of the elk became infected with a slow-developing, but fatal disease, called Johnne's from the rancher's cattle during their confinement. Half the dairies at Point Reyes had it then based on a study done about the time the elk arrived and half the dairy cow herds and an unknown number of beef cattle herds at Point Reyes and possibly GGNRA still have the disease because the Park Service never did anything about it. While the

10 elk were confined at Pierce Point, a 3-mile 8-foot high wire mesh fence was constructed from Tomales Bay on the east to the ocean on the west to keep the elk confined permanently in a 2,600 acre area that had no perennial streams. During the drought a few years ago, approximately 250 of the 500 elk in the enclosure died due to lack of adequate water. The 1998 elk plan warned that this would happen because the only real water supplies in those 2,600 acres are livestock ponds dug out by the ranchers who over time used to occupy the Pierce Point Ranch. During a drought the ponds dry up, leaving some elk to die of thirst. The Seashore's response to the deaths was that NPS policy with wildlife is to let nature take its course. That was roundly criticized, even by some ranchers, given that the elk were lockup behind a fence with inadequate water during droughts.

Keeping the wild elk confined behind an elk-proof fence without adequate water is a violation of all three of the statutes that require NPS to avoid impairment of natural resources, including wildlife, and to protect, preserve and restore the natural environment of the Seashore. In fact, confining them in itself is a violation of the three



statutes and NPS policy regarding not holding wildlife captive in national parks.

Johne's Disease. NPS is in violation of the three statutes listed at the beginning of this letter because it has never done anything to rid the parks of Johne's disease.

The parks are to be managed in an unimpaired condition and their natural resources are to be protected, preserved and restored. All three elk herds have the disease today thanks to the infected cattle and inaction by NPS. The Park Service studies the elk all the time to try to identify elk with Johne's by testing fecal samples (and in 2016 unnecessarily shooting 24 elk to get tissue samples as well), but they never require testing and culling the cattle to free the park of the disease (testing and culling of elk would also be necessary). Point Reyes is the only one of the 22 locations of tule elk herds that have Johne's disease. (Personal communication with Cal F&W elk manager Joe Hobbs.) The Park Service should establish a rigorous program to eliminate Johne's disease, including testing and culling. See <https://johnes.org/general/control.html>

Manure spreading.

Allowing manure spreading is contrary to the three statutes. Spreading of dairy cow manure over 2,500 acres of the seashore spreads Johne's disease because an unknown number of dairy cows have the disease and it is carried in the manure where it can last for a year on the ground. If an elk (or deer) eats grass that has manure on it the elk (or deer) will get Johne's disease. If a pregnant elk cow has the disease it is passed on to her fetus. Johne's can also be passed on to an elk calf even if the mother doesn't have the disease if the mother lies down where Johne's exists on the ground if the calf later takes in the disease by nursing. Many elk have died due to the presence of Johne's and NPS has never bothered to rectify that.

Habitat modifications for the Drakes Beach Herd. (page 81) The DEIS states:

Habitat modifications for the Drakes Beach herd included two projects. The first—a water project at D Ranch—was completed in 2013 and is ongoing; it provides reliable water sources for elk away from ranches. The second—repeatedly mowing portions of D Ranch in spring 2018—was to test both the elk's response and this approach for controlling invasive plants that degrade the suitability of habitat for elk.

DEIS at 81.

In other words, at the Tomales Point Elk Reserve where NPS keeps the elk locked up behind an 8-foot woven wire fence without adequate water during times of drought and takes a "let nature take its course" when a drought hits, while at the Drakes Beach area, where the wild free-roaming elk use dairy ranch lands and ponds for food and water some of the time, the elk get special year round water sources built for them and special forage treatments to encourage more grass to keep the elk away from the ranch lands and ponds. Such a double standard flies in the face of national park laws requiring that natural resources, including elk, be the overarching focus of management, not non-native cattle.

Brush cutting. Brush cutting is harmful to elk because while they are primarily grazers, they also browse and depend on native brush species such as coyote brush, bush lupine and other native brush species.

Fencing. There are many, many miles of barbed wire fencing in the two parks. I have checked the fencing throughout the Seashore and have seen no fencing that is "wildlife-friendly" except a couple of 16-foot long spots along Drakes Beach Road where NPS has lowered the fence at a few places to lower the number of fence breaks caused because the fences along both side of the road are too high for elk to jump over easily.

Livestock fencing (most commonly barbed wire) can kill and injure wildlife. However, it can be constructed to be much less harmful to wildlife. Such fencing is commonly referred to as "wildlife friendly." I wrote about fencing in the seashore and how none of the fencing that I examined was "wildlife friendly." As long as there is any ranching in the parks, all fencing should be "wildlife friendly." <https://jimcoda.com/2014/07/26/point-reyes-national-seashore-fencing-harmful-to-wildlife/>

On BLM grazing lands where deer or elk exist, the specifications are: three wires, top wire 38 inches above ground (to ensure deer and elk can easily clear it), bottom wire to be smooth (non-barbed) and 16 inches above ground (for fawns and elk calves to get under) and at least 12 inches clearance between the top wire and the middle wire (to prevent "scissoring" or trapping hind legs between the top two wires when jumping because their hooves face forward for part of the jump).

Fencing Manual at IV-4 and IV-5. <https://www.google.com/search?q=blm+manual+fencing+1v-4&rlz=C1CHBFenUS805US805&oq=blm+manual+fencing+1v-4&aqs=chrome..69i57j0j7&sourceid=chrome&ie=UTF-8>

Below is a photo I took on October 16, 2014, of a bull elk during the rut near Drakes Beach. It shows barbed wire tangled in the antlers.

(photo)

Below are two photos I took on July 15, 2014, of a bull elk skull that was found on Mt. Vision above Home Ranch at the Seashore. When barbed wire gets tangled in the antlers it can lead to death.

(photo)

(photo)

Note in the first photo that the wire cut into the bridge of his nose and in the second photo that it worked its way well into the lower jaw. He could not eat or drink because of the barbed wire. He must have died a slow agonizing death.

Cattle and the barbed wire fencing that goes along with the cattle don't belong in a national park. Because of the damage it can do to elk and deer, NPS is violating its duty to avoid impairment of the resources of a national park, including the wildlife. But to the extent it is there, NPS should at least require that the fencing be designed to avoid injuring and killing wildlife.

Hazing. Hazing elk in a national park which involves chasing them from lands that nature causes them to choose for feeding to a very small area the Park Service has decided they should stay in to keep ranchers happy, is wrong. It is also contrary to the duty to manage resources in an unimpaired manner and to protect, preserve and restore those resources, including the tule elk.

#### CHAPTER 4: ENVIRON. EFFECTS OF ALTERNATIVES (Pages 99-194)

The 1916 NPS Organic Act and language in the PRNS and GGNRA legislation prohibit the Park Service from impairing natural resources in its management of these parks. Yet, the DEIS admits that all the ranching alternatives will impair the natural resources of the parks. Consequently, the Park Service has no discretion to choose any of the ranching alternatives.

#### SOILS.

The Park Service admits that all the alternatives will impair soils, except Alternative F, the no ranching alternative.

Alternative A. The continuation of current ranching would continue to cause the same harm as always. Various activities, such as cattle trails and compaction of soils where cows walk and mill around would lead to erosion and compaction of soils. High intensity areas would continue to be barren of vegetation with serious compaction. Forage/silage production would compact soil because of all the heavy equipment used to spread seeds and mow and later collect the windrowed silage.

Cumulatively, Alternative A would continue to contribute noticeable long-term, adverse impacts on soils across the planning area from erosion, compaction, and altering the soil fertility, primarily from livestock grazing on 27,000 acres; 1000 acres of forage production; 150 acres of high-intensity-use areas; and manure spreading on approximately 2,500 acres over a period of years.

Alternative B. NPS says the impacts to soils under Alternative B would be the same as with Alternative A except that with a zoning framework the adverse effects would be somewhat less. This strains credulity. The use of the 65% of each ranch that would be managed as "range" zone would be managed as all of the ranch areas before were managed and the "pasture" zone, which comprises 34% of each ranch, would be subject to much more intensive uses, such as "diversification" where as many as 50 ewes and 50 lambs, plus 500 chickens, would be allowed to roam and forage. This would have a much greater impact on the land and would cause all kinds of conflicts with wildlife.

Alternative C. NPS says all ranch and vegetative management, diversification activities would be the same as under Alternative B except there would be some added ground impacts with the removal of all the Drakes Beach elk.

Alternative D. NPS says that 8400 acres would be removed from grazing which would mean much greater soil conditions on those 8,400 acres. The remaining 19,000 acres would be similar to the impacts under Alternative A.

Alternative E. Under Alternative E the impacts would be less than Alternative A because the 6,200 acres of dairy ranching would be converted to beef ranching for a total of 26,100 acres of beef cattle grazing. Impacts to soils would be reduced because activities associated with dairying would be removed. That would include manure spreading which compresses soils due to heavy manure trucks on soils. It would also remove 86 acres of the 150 acres of high intensity use areas (concentrated animal feeding operations). It would remove most of the 1,000 acres of silage growing which activity compresses soils during seeding, mowing and harvesting. (Silage growing would apparently continue on the G and H beef ranches.) Finally, there would be no need to spread manure over 2,500 acres of manure fields which avoids the compression of fields from the manure trucks, reduces the chances of Johne's disease spreading, and is friendlier to native plants that are not happy with overly fertilized soils. There would however, still remain 3,150 beef cows (the 2,400 beef cows and plus the 750 beef cows that would replace the 3320 dairy cows) still impacting natural resources.

Alternative F. Alternative F "would allow soil conditions to slowly return to natural conditions." This is the only alternative that complies with the Park Service's duties under its three statues and policies.

**WATER QUALITY.** The Park Service admits that all the alternatives will impair water quality, except Alternative F, the no ranching alternative. NPS laws, and internal procedures which implement those laws, prohibit any impairment.

The DEIS admits that some of the lands drain into and pollute Tomales Bay, but the DEIS defends that by stating that NPS lands are a small contributor. The fact that Tomales Bay is very large and many lands outside the two parks also drain into the Bay, doesn't change the fact that the two parks are polluting a very large bay. Being one of many is not a defense to water pollution. It could be that no single entity is contributing more than a small portion of the pollution of Tomales Bay.

Alternative A. "Alternative A would continue to contribute adverse impacts on water resources in the planning area from beef and dairy cattle ranching, nutrient management and water use consumption related to ranching activities." DEIS at

117. See my discussion under Affected Environment for more on water pollution under Alternative A. Water pollution would continue as it has in the past. Furthermore, under Alternative A and the other ranching alternatives, the DEIS avoids talking about baseline conditions and long-term trends regarding park lands polluting Drakes Bay, Abbott's Lagoon, Kehoe Beach, the ocean and any other water bodies those lands drain into.

Alternative B. Water quality would suffer under Alternative B in a manner similar to Alternative A.

Alternative C. Water quality impacts under Alternative C would be the same as under Alternative B.

Alternative D. Alternative D would reduce beef cattle from 2400 AUs (2400 head) head on 26,500 acres to 1700 AUs on 19,000 acres. Diversification would not be allowed on the pasture zone, just the ranch core. While reducing ranching to just 19,000 acres and 1,700 beef cattle plus 3130 dairy cows, and not allowing any diversification on the pasture areas of these non-residential lands, would be somewhat better than Alternatives A, B and C, from a water quality standpoint, it is still similar to Alternative A, except on 19,000 acres instead of 26,000 acres.

Alternative E. Alternative E involves removing dairying from the 26,100 acres of land with the six dairy ranchers substituting beef cattle for their dairy cows. Because beef cows spend essentially all their time grazing on pastures and dairy cows spend roughly one quarter of their time on pasture (and the rest of the time eating hay, silage and grains, most often indoors), the 3130 dairy cows would be replaced by a total of 750 beef cows. While phasing out dairying would be a significant improvement to water quality compared to the status quo, it would still involve beef cattle on 26,100 acres of two national parks.

Alternative F. Alternative F would involve removing all cattle from the two parks. All resources would be better off and the trend would be to move in the direction of what things were like before cattle arrived.

#### VEGETATION, INCLUDING FEDERALLY LISTED SPECIES.

The areas that cattle graze on are overgrazed and would continue to be overgrazed under all the ranching alternatives. This is because, in part, NPS is assuming the average size of a cow is 1,000 pounds, but as explained above under the beginning of Alternatives Section, black angus cows (the most common beef cows in the two parks today) weigh 1410 pounds.

Of course, bigger cows need more nutrients. The neat thing is nutrient requirements don't go up in direct proportion to the size of the cow.

They actually go up at a  $\frac{3}{4}$  powers ratio, or 75%, not one to one. So, the maintenance energy required by the 1,400-lb. cow is about 11% higher than that required by the 1,200-lb. cow, despite the fact that she is about 16% heavier.

<https://www.beefmagazine.com/cow-calf/relationship-between-cow-size-production>

Applying these factors, an average 1,410 pound Angus cow weighs 41% more than a 1000 pound cow. Applying the 75% formula, the larger cow needs 30.25% more forage than the 1,000 pound cow. The Park Service is ignoring this by using weights that are decades old and in the process the grazing lands at Point Reyes are being seriously overgrazed.

Assuming, arguendo, that the Park Service is correct that a 1000 pound cow needs about 26 pounds of dry matter per day, applying the formula above means a 1410 pound Angus cow would need 30.25% more feed, or about 7.86 more pounds per day.

This alone means NPS has been assuming grazing is removing 30% less forage than has been occurring. No wonder the park looks so overgrazed. The Park Service should immediately reduce AUs by 30% to account for the larger cows.

All the ranching alternatives would have varying degrees of negative impacts on vegetation. Alternative F, which would allow the vegetation to slowly return to natural conditions would have a beneficial effect.

#### WILDLIFE, INCLUDING FEDERALLY LISTED SPECIES. (Page 141-161)

The DEIS states that all the alternatives would have good and bad effects on wildlife, depending on the species.

The DEIS states that removing cattle will cause an increase of shrubs and reduction in grasslands. This ignores the fact that the 2,600 acres of former ranchlands which is now the Tomales Point Elk Reserve has approximately the same ratio of grasslands to shrub as existed when ranching was stopped there in 1980. The elk have kept the ratio

the same even though there were only 10 elk in 1980 to start with and no additional elk have been brought in since then. The current ranch lands outside the elk reserve have about as much shrubs as the elk reserve, especially on the dairy lands.

Furthermore, the ideal, from a vegetation standpoint, is the original native coastal prairie (which had shrubs interspersed in it) that existed until European man came with his cattle. All the native grasses are gone from current grazing lands due to cattle. Regarding shrubs, they are an important source of food and cover for many birds and mammals, including elk. The cattle changed the ideal, natural scene that existed before European man arrived to the highly disturbed scene we have today where the coastal prairie has disappeared, except for a few areas that cattle can't access. Removing cattle would be the first step in returning the unacceptable conditions of today to the ideal, natural scene of yesterday consistent with the three laws governing management of the two parks.

Diversification. Allowing any livestock on these ranches smaller than cattle, such as sheep, goats, pigs and chickens will create extreme predator conflicts that will result in killing of predators or harming them directly or indirectly, in violation of your statutory duty to protect natural resources, including wildlife. Some of the predators what will cause conflicts include bald eagles, red-tailed hawks, great horned owls, mountain lions, coyotes, bobcats, badgers, foxes, skunks and weasels. It will also require much more restrictive fencing to contain those smaller domestic animals which will in turn reduce wildlife habitat and restrict wildlife movement. Livestock guardian dogs should be prohibited because they can and will attack or fight with a predator if it is unable to drive away the predator and they have been known to look for predators to catch and kill them. Allowing the planting of row crops will also cause problems to natural resources, including, but not limited to, reduced habitat for wildlife; the use of fencing that is more impermeable to wildlife travel than the current barbed wire fencing which will further impede wildlife travel across thousands of acres of land; and the use of herbicides and pesticides, including dangerous chemicals injected into the ground where artichokes and certain other crops are grown and which may then enter the groundwater of the park.

These and any other diversification ideas are also contrary to the three statutes set forth above.

Silage growing kills wildlife. It is common knowledge that silage mowing is done in the spring when birds are nesting in it and it kills nestlings. "Estimating Impact of Mowing in the Silage Fields of Point Reyes National Seashore on Breeding Birds," by Point Blue Conservation Science (Ryan T. DiGaudio et al.), August 31, 2015. Allowing it is contrary to the three statutes and other laws. Silage mowing also kills small mammals. The documentary "The Shame of Point Reyes" even shows a coyote pulling the body of a mangled deer fawn from a silage windrow at Point Reyes in May 2019.

ELK. (Pages 161-166)

Alternative A. Alternative A would continue NPS's current method of managing the elk with hazing them off ranch lands, continuing to monitor and test the elk for Johne's and annual monitoring and no specific policy regarding elk numbers.

Hazing must be stopped. It is contrary to NPS's three statutes requiring that elk and other natural resources be protected, preserved and restored, not harassed.

Re Johne's, stop studying the elk and address the cause of the problem, the dairy cows (and possibly beef cows). NPS has a statutory duty to stop the impairment of Point Reyes caused by the dairy cows spreading Johne's disease to the elk and deer, not to mention other dairy cows. Start strict testing and culling of dairy cows.

Habitat improvements. Stop providing special water and forage for the elk when it is being done to keep the elk from feeding where their instincts tell them to go. When NPS was accused of inhumanity toward the elk that died from the drought at Tomales Point, NPS claimed that NPS policy is to let nature take its course, but when the ranchers complain about the elk, NPS does all sorts of unnatural things in

the way of providing water and food to keep for the elk to keep the elk in a small area away from the ranches.

Fencing. The DEIS seems to say that under Alternative A wildlife-friendly fencing would not be considered. NPS has a duty under its statutes to manage the Seashore in a way that protects wildlife, such as elk, and the current fencing is not protective of the elk, but harmful to the elk (and other wildlife).

Alternative B. Somewhat similar to Alternative A, except for shooting 10-15 elk a year. Shooting 10 to 15 elk a year is not justifiable when there are cattle. Elk have priority over cattle under your three statutes. Furthermore, tule elk have serious genetic problems given that all the living tule elk today are the descendants of apparently only three elk. The best thing for a species with that problem is to increase its population as much as possible, not to reduce it.

Alternative C. This alternative is similar to B, except it would involve shooting all the Drakes Beach elk. This is the most egregious and unlawful of all the alternatives.

Alternative D. This is similar to B except it removes 7,500 acres from cattle grazing. It allows the Drakes Beach elk to use the east side of the old D Ranch lands, which are currently used by A Ranch cattle, but not the west side currently grazed by C Ranch cattle. There is no explanation as to why the west side of this non-residential ranch isn't part of Alternative D. It is also not clear whether the elk herd would be limited to 120 animals as under B.

Alternative E. Removing dairy cows would have less negative consequences for elk, and other natural resources, than Alternatives A -D.

Alternative F. This alternative is by far the best for elk. The elk fence at Tomales Point would be removed allowing those elk to roam as wild free-roaming animals and to have access to water even in drought times. Point Reyes would become more popular for having the largest tule elk herd one day. All of the tens, if not hundreds, of miles of fences would be removed. Elk would no longer be injured in trying to jump over barbed wire fences. This is the only alternative that complies with the statutory duty to protect, restore and preserve the natural resources of the parks.

In summary, none of your ranching alternatives comply with your duty to avoid impairing natural resources. To avoid breaking the law, you can either select Alternative F as your decision or you can try to develop new alternatives that comply with your statutory duties.

I commented during both rounds of the Comprehensive Ranch Management Plan process and both the initial request for comments on a conceptual range of alternatives and the later request for scoping comments regarding a GMPA. I incorporate those comments herein by reference.

#7564

Name: Patton, Morgan

Correspondence: RE: General Management Plan Amendment Draft Environmental Impact Statement

Dear Superintendent Muldoon,

The Environmental Action Committee of West Marin (EAC) greatly appreciates the opportunity to provide comments on the National Park Service (NPS) Point Reyes National Seashore's General Management Plan Amendment (GMPA) Draft Environmental Impact Statement (DEIS).

Since 1971, EAC has worked to protect and sustain the unique lands, waters, and biodiversity of western Marin County, California. EAC's membership represents 1,000 individuals: 86 percent of our membership lives in the San Francisco Bay Area, 58 percent of our members are located in Marin County, with the remaining 10 percent in other counties in California, and 4 percent outside of California. Since 2014, EAC has been actively involved in the

public processes concerning proposals for continued ranching within Point Reyes National Seashore (Seashore) and Golden Gate National Recreation Area and has actively participated in collaborative discussions with a variety of stakeholders.

## 1. Introduction -The Preeminent Mission of a National Park is to Conserve Natural Resources

The GMPA, developed through a public planning process, should protect, restore, and preserve park resources using ranch leases that ensure multi-generational, environmentally sustainable ranching that is complementary to the natural resources and visitor experiences in the park.

The DEIS for the GMPA for the Seashore is mandated under the National Environmental Policy Act (NEPA). Many additional laws also govern this process including, but not limited to, 54 U.S.C. § 100101 (a)<sup>1</sup>, the four statutory elements of 54 U.S.C. § 100502, 54 U.S.C. § 100101,<sup>2</sup> and the Seashore's Enabling Legislation.<sup>3</sup> The GMPA and the DEIS must also align with the Seashore's purpose statement that is the foundation for understanding what is most important about the park which states, "Established for the public benefit and inspiration, the Point Reyes National Seashore protects a rugged and wild coastal peninsula and surrounding waters, connecting native ecosystems, enduring human history, and recreational, scientific, and educational opportunities."<sup>4</sup>

Overall, the DEIS achieves several important objectives in attempting to balance the multiple uses and at times conflicting priorities and management strategies of the Seashore's resources in order to implement practices that mitigate some environmental impacts from the beef and dairy ranching operations located within the proposed Ranchland Zone (or planning area). Unfortunately, NPS appears to have abused its discretion and authority in the DEIS by moving far beyond the originally delegated authority to

"recognize the role" of established families' continued beef and dairy ranching to allow new uses in the Ranchland zone based on economic considerations for private businesses through diversification.

Specifically, the DEIS fails to consider the full scope of cumulative impacts to environmental resources (including direct and indirect effects) and connected actions. In addition, in certain instances the DEIS also fails to include all reasonably foreseeable impacts at the time of the DEIS. As discussed below, EAC finds inconsistencies with the proposed purpose of action through the allowance of new agricultural uses and erosion of multi-generational ranching, inconsistencies with regulatory requirements, and failure to consider impacts of diversification on park resources.

Oddly, the DEIS prioritizes the effects on commercial lease holders of foreseeable financial market fluctuations ahead of foreseeable environmental impacts to park resources. This priority is inconsistent with Congressional direction for the Seashore . Resource protection is the highest value for the Seashore as intended by the 16 U.S.C. Sec. 459c (6)(a) where Congress elaborated on this statement by requiring the Department of the Interior to administer its Point Reyes lands "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,..."<sup>16</sup> U.S.C. Section (Sec.) 459c (6)(a) (emphasis added).

EAC's comments below address inconsistencies in the actions proposed in the DEIS with the regulatory requirements as prescribed by NEPA, U.S. Code, supporting case law, and other references.

## 2. Inconsistencies with Direction to Enable Long Term Leases for Beef and Dairy Ranching, Consistent with Applicable Laws and Planning Processes

NPS exceeded their delegated authority in two areas. First, NPS presents public alternatives that would allow for new agricultural uses outside of beef and dairy ranching. Second, the DEIS erodes multi generational directives as it allows for a competitive open bidding process to grant leases through the proposed succession process.

## 2.1. Direction to Issue Long-Term Leases for the Purpose of Cattle and Dairy Ranching

In 2012, when NPS did not renew the lease for Drakes Bay Oyster Company, in order to fully designate Drakes Estero as Marine Wilderness, then Secretary of the Interior, Ken Salazar, issued a decision memorandum that stated,

... "I direct that the Superintendent work with the operators of the cattle and dairy ranches within the pastoral zone to reaffirm my intention that, consistent with applicable laws and planning processes, recognition of the role of ranching be maintained to pursue extending permits to 20-year terms for the dairy and cattle ranches within the pastoral zone<sup>5</sup>."

In 2013, NPS Director Jonathan Jarvis in his Delegation of Authority authorized,

"...the issuance of lease/permits for the purpose of grazing cattle and operating beef and dairy ranches, along with associated residential uses by the lessees and their immediate families and their employees, and their employees' immediate families, within the pastoral zone of Point Reyes National Seashore and the northern District of Golden Gate National Recreation Area administered by Point Reyes National Seashore. Under this delegation, you may issue lease/permits with terms of up to twenty years. These long-term lease/permits will provide greater certainty for the ranches operating within the national park's pastoral zone and demonstrate the support of the National Park Service (NPS) and the Department of the Interior for the continued presence of dairy and beef ranching operations <sup>6</sup>."

The DEIS exceeds NPS' discretionary authority by allowing for new agricultural uses to be developed. When the scoping process began under the 2014 Ranch Management Plan, and again in 2016 and 2017 when NPS initiated the GMPA process, EAC has repeatedly asked the NPS under what authority the NPS is able to consider diversification. EAC is unable to find any authority granted as such to NPS. EAC explores additional concerns with diversification later in this letter.

## 2.2. Direction to Issue Leases for Purpose of Multi-Generational Ranching

NPS proposes an accompanying "Succession Policy" document, that is not referenced directly within the DEIS under that title, that would allow for NPS determination whether it is "appropriate to maintain the lease/permit area in agriculture" and then states that "NPS would pursue issuance of a request for proposals (RFP) to identify a new operator. The RFP process would be conducted consistent with NPS policy and regulations, and the review criteria would be identified at that time." <sup>7</sup>

Recognition of the historic and cultural values of dairy and ranching operations located within the proposed Ranchland Zone (planning area) is highlighted by the 2018 designations of two historic districts - - the 22,237-acre Point Reyes Peninsula Dairy Ranches Historic District and the 14,127-acre Olema Valley Dairy Ranches Historic District - - that encompass more than a century of change and modernization in the industry, including the evolution from original wood frame milking barns to concrete Grade A sanitary barns of the 1940s.<sup>8</sup>

The proposed Succession Policy disregards NPS directives that emphasize the values of multi generational beef and dairy ranching . As directed by the 2012 Secretary of the Interior's directive, "... recognition of the role of ranching be maintained to pursue extending permits to 20-year terms for the dairy and cattle ranches within the pastoral zone. In addition, the values of multi-generational ranching and farming at Point Reyes should be considered in future planning efforts<sup>9</sup>."

To remain consistent with the delegated authority and the park's purpose, NPS should focus continuation of ranching on cultural and historical significance of multi-generational beef and dairy ranching and should not open ranching operations (and the proposed newly expanded uses discussed below) to operators from the general public. Opening the Seashore to outside operators would have significant impacts on the park's cultural and historic values. The DEIS fails to analyze these impacts, and even fails to provide enough detail about the RFP



process to say what the impacts may entail, or when they may occur.

### 3. Inconsistencies with NEPA Requirements

In preparing an EIS, an agency must satisfy the NEPA requirements to consider all "(a) connected, cumulative, and similar actions; (b) a no-action alternative, other reasonable alternatives, and mitigation measures; and (c) direct, indirect, and cumulative impacts." *W. Watersheds Project v. Abbey*, 719 F.3d 1035, 1046 (9th Cir. 2013), (citing 40 C.F.R. §1508.25).

The DEIS conducts its environmental analysis entirely by weighing benefits to private commercial operations versus mitigation measures to lessen harm to resources. It does so by analyzing measurements for commercial ranching metrics to meet organic standards and forage production to ensure specific numbers of animal units.

While the DEIS does address some environmental impacts through this methodology, the analysis is incomplete. The DEIS fails to adequately meet the legal requirements to analyze connected actions, cumulative impacts, direct and indirect effects, and reasonably foreseeable consequences of decisions being authorized in the plan. We discuss below the specific concerns and required agency considerations that fail to meet NEPA requirements.

### 4. Failure to Analyze Connected and Cumulative Impacts of Diversification on Environmental Resources

Looking first at diversification as proposed in Alternatives B, C, and D, the DEIS fails to address several impacts under NEPA from the introduction of diversified agriculture into the Seashore planning area that includes row crops, livestock, farm stays, small-scale processing facilities, and farm stands that would result from new types of commercial agricultural production. In addition, the DEIS does not preclude ranchers who have businesses or property outside of the Seashore from importing those products into the Seashore for retail sales or small-scale processing. These actions could lead to processing facilities and farm-stand sales or tastings for wine and whiskey. In addition, the DEIS is unclear whether small-scale processing also includes animal slaughter.

The proposed changes would allow "ranchers to react to fluctuations in the economic market<sup>10</sup>" through a menu of diversification options and lead, foreseeably, to ranchers converging on the highest profit-margin options in the future.

NPS did not evaluate cumulative e, direct or indirect impacts, connected actions, or reasonably foreseeable outcomes of diversification. Rather, the DEIS states,

The programmatic analysis in this EIS broadly addresses the general environmental issues, impacts, and benefits to establish overall management direction for the planning area. Implementation of some programmatic direction... would require additional project-level planning and compliance to develop and analyze site-specific proposals and cost estimates. Compliance for these projects would tier from the programmatic analysis in this EIS and be consistent with the general direction provided in this EIS. 11

Broadly addressing an incomplete list of impacts to park resources by means of a general list of mitigation measures while also providing for wide-ranging interpretations of diversification activities fails to evaluate connected and cumulative actions that require an environmental review at the time of the DEIS.

If the actions are reasonably foreseeable at the time of the EIS, then the impacts should be considered at that time.

"It is not appropriate to defer consideration of cumulative impacts to a future date when meaningful consideration can be given now ...." *N. Plains Res. Council*, 668 F.3d at 1078. Rather, "NEPA requires that an EIS engage in reasonable forecasting. Because speculation is implicit in NEPA, [courts] reject any attempt by agencies to shirk their responsibilities under NEPA by labeling any and all discussion of future environmental effects as crystal ball inquiry." *Id.* at 1078-79 (quotation, alterations omitted). Therefore, an agency must consider all

"foreseeable" impacts at the time it issues the EIS. *League of Wilderness Defenders v. Forest Service*, 689 F.3d 1060, 1075-76 (9th Cir. 2012). Although "NEPA does not impose a requirement that the [agency] analyze impacts for any particular length of time," the length of time analyzed must be reasonable given the facts of the case. *Selkirk Conservation All. v. Forsgren*, 336 F.3d 944, 962 (9th Cir. 2003).

If the DEIS cannot consider foreseeable impacts of diversification within the DEIS, all references to diversification should be removed before the Final EIS is filed.

#### 4.1. Diversification - Individually Reviewed Ranch Operating Agreements

The DEIS proposes a delayed, disconnected, and piecemeal review of diversification activities through individual Ranch Operating Agreements (ROAs)<sup>12</sup> that are negotiated with individual ranchers. This approach may cause interconnections of watersheds and species considerations to be overlooked as NPS range managers focus on individual ranch zones and fail to analyze cumulative and related environmental impacts within the planning area.

This methodology fails to incorporate the complete scope of impacts to park resources over time, as each ranch is not an island. Actions of one ranch may impact the neighboring ranch's sensitive resources and also impact areas which may be outside of the planning area, including designated wilderness (Drakes Estero and Abbotts Lagoon) and popular public recreational areas like beaches (Drakes Beach, Kehoe Beach, North Beach, etc.) and trails (Muddy Hollow, Estero Trail, Bull Point, Abbotts Lagoon, etc.). If the Seashore managers undertake individual evaluations of ranching operations on different timelines, scales, and operational impacts, they are unable to fully consider cumulative and connected impacts.

Thus, reasonably foreseeable adverse impacts to vegetation, air and water quality, water resources, visitor experience, and soils are not considered.

We have included two reasonably foreseeable examples below:

A) Development of an individual ROA "Ranch 1" for the sake of illustration may include a ranch that plans for restoration activities near riparian corridors to positively mitigate environmental impacts of its cattle and other diversified grazing activities, while also requesting development of row crops and/or conversion of a barn to a processing facility with a farm stand. This ranch would improve water quality with riparian mitigations but increase impacts on scenic resources including the historic character of the dairy or ranch district, and create traffic and parking issues with the new processing and visitor serving facilities. The DEIS provides a framework for NPS to evaluate these requests in the ROA under the Ranchland Zoning (programmatic resource management planning).

However, if "Ranch 2" negotiates a separate ROA at a later time, that ROA may be in alignment with the Ranchland Zone framework and would not trigger further environmental review outside of the programmatic EIS. The decisions made for operation on Ranch 2 under this framework could include continued grazing downstream of the neighboring Ranch 1's riparian corridor restoration project.

Thus, while an individualized approach to analyze individual ROAs may be appropriate for ranching plans for private property, applying this tiered methodology to public lands may be more complicated as each ROA is interconnected with other resources in the Seashore.

#### Figure 1: McFadden and Rogers Ranch Zones

This map was created by merging the NPS DEIS Appendix A - Zoning Maps Figures 24 and 25 (pages 25 and 26) with an overlay of google maps that highlights the location of Olema Creek that is defined as Steelhead Critical Habitat. The DEIS Appendix A, Figure 46: Habitat in the Planning Area identifies this area as Critical Habitat for Watersheds Containing Central California Coho Salmon .

B) Further complicating this, the DEIS does not provide any maps to past, present or planned restoration activities within the planning area, which prevents the public from understanding the restoration work that occurs within the park and how those activities are connected or disconnected from current beef and dairy ranching operations.

A specific application of examples A and B include the McFadden Ranch (Figure 24, p. A-25) that has past and present watershed restoration projects that have taken place over the last two years. The McFadden Ranch watershed restoration project has been mapped as a new Resource Protection Subzone13 and removed from active grazing in the DEIS. However, directly downstream on the neighboring Rogers Ranch (Figure 25, p. A-26) continues to be mapped as Range Subzone14 and continues to allow seasonal grazing activities. The mapped creek flows directly into wetlands, Olema Creek, and eventually to §303(d) impaired Tomales Bay. This watershed is also defined as Critical Habitat for Watersheds Containing Central California Coho Salmon.<sup>15</sup> While this specific example is limited, the DEIS fails to include any maps or references to other past, present, or future restoration planning activities for the public to evaluate eco-system connections for the Seashore.

This planning approach allows for negative environmental impacts to occur just downstream of a successful restoration project that diminishes much of the upstream rancher's beneficial work to improve water quality. Downstream livestock should be fenced away from the creek to support proactive conservation standards. ROAs must be evaluated against restoration projects and sensitive resources and remove recently restored areas from grazing unless required for prescribed invasive species controls. This should be a practice throughout the Ranchland Zone to promote beneficial uses for freshwater streams, wetlands, and connected hydrology throughout the entire Seashore.

These two examples, A and B, are illustrative of the connected and cumulative impacts that are reasonably foreseeable for diversification actions that will occur under this DEIS framework. However, the DEIS fails to analyze them in any detail, and it is not clear how NPS will analyze disconnected and individual ROAs for commercial operations in project-level programmatic planning through application of cumulative impacts, connected actions and indirect effects.

"An agency may not avoid an obligation to analyze in an EIS environmental consequences that foreseeably arise from an [Resource Management Plan (RMP)] merely by saying that the consequences are unclear or will be analyzed later when an EA is prepared for a site specific program proposed pursuant to an RMP. "[T]he purpose of an [EIS] is to evaluate the possibilities in light of current and contemplated plans and to produce an informed estimate of the environmental consequences .... Drafting an [EIS] necessarily involves some degree of forecasting." City of Davis v. Coleman, 521 F.2d 661, 676 (9th Cir. 1975) (emphasis added)."<sup>16</sup>

It is impossible for the public to understand the complexity of NPS' decision-making process and NPS' responsibility to properly evaluate the cumulative impacts and connected actions of the ROAs and how the outcomes of mitigation measures on one property may be denigrated on another without updating the DEIS to include mapping and other information, as well as an appropriate evaluation of cumulative environmental impacts of all of these ROAs at this time in the EIS process.

ROAs should be developed for current operations (not including newly proposed diversification) and included in the DEIS, so that all connected and cumulative impacts may be properly evaluated in the planning area.

Under NEPA,

"Connected actions" are "closely related and therefore should be discussed in the same impact statement." Actions are connected if they: "[a]utomatically trigger other actions which may require environmental impact statements" or "[c]annot or will not proceed unless other actions are taken previously or simultaneously," or "[are interdependent parts of a larger action and depend on the larger action for their justification." 40 C.F.R. §1508.25. "Cumulative actions" are actions which, "when viewed with other proposed actions have cumulatively significant impacts and should therefore be discussed in the same impact statement." Id. Similar actions are actions which, "when viewed with other reasonably foreseeable or proposed agency actions, have similarities that provide a basis for evaluating

their environmental consequences together, such as common timing or geography." Id.

Connected actions and indirect effects to park resources must be analyzed at the time of the DEIS. "NEPA requires that an EIS analyze environmental consequences of a proposed plan as soon as it is reasonably possible to do so." Native VIII. of Point Hope v. Jewell, 740 F.3d 489,497 (9th Cir. 2014).

In summary, a comprehensive analysis of connected and cumulative actions is required at this stage of the DEIS. If NPS is unable to satisfy this requirement, then considerations for diversified operations should be removed before the Final EIS is issued.

#### 4.2. Impacts of Diversification - Conflicts with Wildlife

The introduction of sheep, goats, and chickens into a proposed Pastoral Zone and pigs into the Ranch Core Zone will create conflicts with wildlife that are not analyzed in the DEIS. The DEIS refers loosely to potential wildlife conflicts through predation of newly introduced sheep, goats, and chickens in the Ranchland Zone by advising on the use of animal husbandry, structural measures, and repellants and frightening devices to reduce potential for conflict.<sup>17</sup>

The DEIS fails to analyze the potential for increased conflict with Seashore wildlife including coyotes, badgers, bobcats, foxes, and raptors such as hawks and owls.

For example, the United States Department of Agriculture (USDA), Animal and Plant Health Inspection Service 2018 Program Data Report for the United States summarized the numbers of killed or euthanized wild animals that included: 303 American Badgers, 2,002 Bobcats, 68,186 Coyotes, 375 Mountain Lions, and 1,784 Gray Foxes in order to protect agricultural livestock or agricultural property from predators.<sup>18</sup>

The USDA National Agricultural Statistics Services published a 2010 report on Sheep and Goat Death Losses that states, "animal predator losses totaled 247,000 head. This represents 39.0 percent losses from all causes."<sup>19</sup>

The DEIS does not address the foreseeable conflicts with sheep, goats, chickens, and pigs in the Ranchland Zone that could result in high losses for ranchers. This information is available to NPS and potential loss rates and conflicts with predators should be estimated within the DEIS to evaluate if the potential conflict will eventually require NPS actions to manage predators, similar to the current management issue the DEIS is tasked with to evaluate non-predatory tule elk.

In addition, the DEIS fails to analyze impacts of diversification on native wildlife, including fragmentation of habitat, potentially detrimental changes to movement patterns, loss of forage areas, and reductions in available range. Cattle, sheep, goats, chickens, and pigs require different confinement and management methods that create impacts to resources. A field used to graze cattle is still available to coyotes, bobcats and raptors as territory to hunt gophers and voles; the same is not true of an area used for row crops or raising chickens. Eliminating territory for predators and raptors will have a negative consequence on those populations - populations NPS managers are tasked with protecting.

Finally, as mentioned in comments above concerning visitor conflicts with diversification, the DEIS allows for the introduction of guard dogs and fencing to confine and protect sheep, goats, chickens, and pigs from predation. Foreseeable conflicts between park visitors and guard animals will occur as the DEIS does not require that guard animals be trained in specific methodologies to reduce potential harm to visitors. As discussed above, the DEIS fails to address reasonably foreseeable wildlife conflicts.

#### 4.3. Diversification - Vehicles, Public Safety, and Traffic Congestion

Diversification also presents conflicts with visitor experiences and Seashore infrastructure that are not analyzed in the DEIS. Diversification will foreseeably lead to both increased commercial trucking and visitor road usage in the Seashore.

The DEIS fails to clearly outline impacts from increased types of commercial traffic on the Seashore's infrastructure and visitor serving uses. In particular, an increase in truck traffic is reasonably foreseeable for commercial operators to distribute and conduct on-site sales. Diversified activities will add commercial trucking to export crops and livestock (sheep, goats, pigs, and chickens) for processing outside of the planning area. In addition, the DEIS allows for ranchers to import crops and livestock into the planning area for small-scale processing or retail sales at farm-stands that will also increase commercial trucking.

Ranches that engage in direct sales to the public - retail and product sales and tastings, farm-stays, and event experiences - will further impact roads, degrade air quality, congest parking, and impact driveways and ranch core areas, as visitors will increase traffic congestion and park vehicles in areas that are not developed currently as parking sites.

Impacts to public safety have not been analyzed for vehicles and biking along the main routes from the introduction of direct retail sales to the public from individual ranches. Pursuant to the Point Reyes National Seashore and North District Golden Gate Recreation Area Agricultural Lease /Permit, Exhibit B Ranch Operating Agreement 20, does not include terms and conditions for local retail or farm stands; however, the DEIS lists diversification activities to include "sale of local agricultural products."<sup>21</sup> Retail sales to the public could include tastings of alcoholic products that could impair individuals operating motor vehicles, or in the foreseeable future other products like cannabis (which could become federally legal within the foreseeable future as a row crop or cultivated in greenhouses).

The DEIS does not analyze the impacts of commercial truck traffic increases. A previous programmatic planning document (2018 Proposed Mitigated Negative Declaration for the Sir Francis Drake Boulevard Improvement Project) calls out the frequency and intensity of impacts from large, heavy commercial trucks and impacts to roadways.

The report states,

"Sir Francis Drake Boulevard [SFDB] provides primary access to the various beef and dairy ranches still in operation on the Point Reyes peninsula. With the exception of specific visitor use destinations, much of the land on either side of SFDB is a historic working ranch ... Ranchers rely on SFDB for conducting ranch operations and transportation of goods. Bulk milk hauler trucks use SFDB on a daily basis to pick up milk from dairy ranches along the road. Sections of SFDB in the vicinity of the ranches exhibit some of the highest pavement distress, as well as highest frequency of patching and pavement overlays. The large, heavy commercial trucks that transport goods to and from the ranches likely contribute to pavement degradation ... SFDB provides primary access to both ranching facilities and PRNS destinations, and is therefore used by a variety of travelers. Typical SFDB users include park visitors in personal vehicles, park shuttle buses, tourist buses, school buses, milk trucks, hay trucks, recreational vehicles, and bicyclists. Based on NPS standards, SFDB is classified as a public use park road and a Class I Principal Park Road/Rural Parkway, a designation for primary access roads or tour routes through parks. In addition, current American Association of State Highway and Transportation Officials standards classify SFDB as a Minor Collector Road. There are no designated bike lanes along SFDB, although the route is classified by Marin County as a Class III bike shared route."<sup>22</sup> (emphasis added).

In addition, the Proposed Mitigated Negative Declaration for the Sir Francis Drake Boulevard Improvement Project pointed to an average daily traffic rate (calculated in 2014) along SFDB was calculated at 1,369 average vehicles per day accessing SFDB.<sup>23</sup> Extrapolating from the daily numbers, this study indicates, on average, the Seashore should expect nearly 500,000 vehicles each year traveling on SFDB. The DEIS portrays a very different calculation of only 400,000 vehicles per year along Sir Francis Drake.<sup>24</sup> The impacts of traffic and vehicles in general appear to be underestimated in the DEIS; moreover, they do not include analysis of additional impacts from diversification activities in the foreseeable future. Therefore, impacts to traffic and visitor experiences require additional analysis and comparison with proposed increases for diversification and the impacts that will have on infrastructure, visitor experiences, and air quality as the maximum emission

thresholds may require an update.

NEPA requires,

"indirect effects are those effects 'caused by the [agency] action [that] are later in time or farther removed in distance, but are still reasonably foreseeable.'" *Ctr. For Envtl. Law & Policy v. U.S. Bureau of Reclamation*, 655 F.3d 1000, 1011 (9th Cir. 2011) (quoting 40 C.F.R. § 1508.8(b)). "Such effects 'include growth inducing effects and other effects related to induced changes in the pattern of land use, population density or growth rate, and related effects on air and water and other natural systems, including ecosystems.'" ' *Id.* (quoting 40 C.F.R. § 1508.8(b)); see also, e.g., *Ocean Advocates v. U.S. Army Corps of Eng'rs*, 402 F.3d 846, 867-70 (9111 Cir. 2005) (holding that an agency violated NEPA by failing to account for the environmental effects of the additional tanker traffic that would be caused by a proposed dock expansion).

The DEIS fails to analyze potential impacts due to changes of intensity, patterns of use, and design of the roadways and ranching cores due to diversification including local agricultural sales. The DEIS also fails to evaluate potential impacts to air and water quality through the increases in truck and visitor traffic.

#### 4.4. Impacts of Diversification - Visitor Experiences

The DEIS outlines several areas where the planning area could accommodate additional trails and public access areas to improve public access in the Ranchland zone through the development of new trails, parking facilities, and third-party partnerships for interpretation. However, whereas the DEIS identifies specific subzones in which rancher diversification can occur, it does not indicate specific areas where potential new public access locations and routes could be placed or designed. As a result, diversification is prioritized over public access in the DEIS.

The DEIS highlights visitor-caused issues that include impacts from crowding and congestion, parking, ranches, trails, and trash and waste without acknowledging how these conflicts will be exacerbated by diversification. 25 The DEIS specifically notes, "visitor use will frequently conflict with ranch operations and that both visitors and ranchers understand what constitutes appropriate access. Increased use of ranchlands may also pose safety concerns related to both visitors' interaction with livestock and to ranch operations such as silage and manure spreading. 26

The concerns discussed in the DEIS present realistic concerns of potential conflicts that will arise as cumulative impacts of diversification; yet, the DEIS also continues to recommend increasing ranching operations through diversification that will only intensify these conflicts in the foreseeable future.

Once the Record of Decision has been filed, ranchers would be able to sign leases with the Seashore and develop ROAs almost immediately and initiate diversification activities and planning. While new visitor experiences, such as new trails and new educational facilities in historic buildings, could in theory also begin immediately, they likely will take much longer to come to fruition. The public engagement process, design, and review stages would take years to implement. By that time, diversified ROAs will be in place through a piecemeal approach that could prevent a network of trails or other interpretative uses in specific areas.

The DEIS prioritizes ranching activities over public use and enjoyment which is in direct contradiction to the Seashore's purpose and Fundamental Resources and Values (FRY) as established in the Seashore's Draft Foundation Document.<sup>27</sup>

FRVs include features, systems, processes, experiences, stories, scenes, sounds, smells, or other attributes that require primary consideration during planning and management processes as they are essential for achieving the purpose of the park and maintaining its significance.

NPS managers are tasked with ensuring the conservation and public enjoyment of FRY qualities to prevent deterioration that would jeopardize the park's purpose and future role. The Seashore's FRVs include: Wilderness,

Scenic and Coastal Landscapes, Marine, Estuarine, and Freshwater Environments, Diversity of Habitats and Native Species, Maritime Cultural Landscapes, Continuum of Human Use ("landscape representing more than 5,000 years of American Indian history... early cultural contacts between Coast Miwok and European explorers... two districts [Olema Valley Dairy Ranches Historic

District and Point Reyes Peninsula Dairy Ranches Historic District] that recognize more than 150 years of ranching... "28), and Opportunities for Inspiration and Recreation 29.

Diversification operations in the Seashore are in direct conflict with the FRVs of Wilderness, Scenic Landscapes, Freshwater Environments and Opportunities for Inspiration and Recreation. The continuum of human use includes recreation (hiking, fishing, photography, plain air painting, picnicking, and visiting preserved or recreated historic structures like Kule Loklo and Pierce Point Ranch). Allowing diversification as set forth in the Preferred Alternative will likely have a detrimental impact on these activities, as well as on the other FRVs.

The inclusion of diversified activities in the planning area complicates other higher priority aspects of the GMPA and makes it impossible to determine other uses and development for other FRVs until ROAs are completed.

Diversified commercial ranching activities are not a primary planning consideration of the GMPA, impacts to these activities have not been sufficiently analyzed, and these activities must not be prioritized ahead of other Seashore values and priority resources within the GMPA.

#### 5. Failure to Analyze Connected and Cumulative Impacts to Wilderness Areas

The DEIS states, "[t]he planning area for the GMP[A] includes all lands currently leased for ranching in the park as well as adjacent lands in Point Reyes where the Drakes Beach tule elk herd currently occurs. Resources outside the planning area may be described if any of the proposed alternatives could potentially affect them." 30

The DEIS is deficient in considering the impacts of ranching activities that occur within the planning area to connected resources and cumulative impacts to areas ecologically connected to the planning area, including, for example, designated wilderness areas, beaches, and wetlands. NPS Management policy 4.1 states,

"Natural resources will be managed to preserve fundamental physical and biological processes, as well as individual species, features, and plant and animal communities. The Service will not attempt to solely preserve individual species (except threatened or endangered species) or individual natural processes; rather, it will try to maintain all the components and processes of naturally evolving park ecosystems, including the natural abundance, diversity, and genetic and ecological integrity of the plant and animal species native to those ecosystems. Just as all components of a natural system will be recognized as important, natural change will also be recognized as an integral part of the functioning of natural systems. By preserving these components and processes in their natural condition, the Service will prevent resource degradation and therefore avoid any subsequent need for resource restoration<sup>31</sup>."

The DEIS incompletely identifies Resource Protection areas as they must also include wilderness protection buffers throughout the planning areas of the Seashore. Although the DEIS<sup>32</sup> provides for a new exclusion area in the Drakes Estero watershed to exclude some cattle grazing, the entire boundary of Drakes Estero is not protected from cattle encroachment. Moreover, the DEIS proposes increased uses in and near Marine Wilderness and sensitive wetland areas.

##### 5.1. Boat-In Camping, Drakes Estero Marine Wilderness

The DEIS loosely proposes boat-in camping along Schooner Bay along the shores of Drakes Estero Marine Wilderness as potential day use and overnight opportunities for "drive-in, hike-in, boat-in camping sites with limited services and amenities (several locations offer possibilities for expanding overnight camping, such as Schooner Bay near Drakes Estero or Home Ranch)." 33

The DEIS fails to analyze or propose any mitigation of impacts for boat-in camping along the shores of Drakes Estero. Proposals for camping and visitor development in areas that could impact wilderness areas must consider cumulative impacts of visitor overnight camping near marine wilderness. High visitation and overnight camping means increases in frequency and number of visitors accessing Drakes Estero, the need for installation of toilets or a program that educates and enforces appropriate human waste disposal, education and enforcement of camp fires, and establishment of trash facilities or education and enforcement for visitors to pack trash out.

The Seashore has had to close other remote boat-in camp facilities in the past along Tomales Bay, like Jack's Beach, due to negative cumulative impacts resulting from human waste and excessive trash that littered the Tomales Bay shoreline and impaired water quality and created public health issues. In addition, the lack of enforcement at remote sites also contributed to the damage of significant cultural resources of the Coast Miwok, federally recognized as the Federated Indians of Graton Rancheria.

Additionally, the introduction of boat-in camping in Drakes Estero will likely have significant negative impacts to waterfowl and shorebirds that migrate through or spend the winter in this location. NPS analyzed these impacts through an EIS, finding that impacts from human uses in Drakes Estero to estuarine birds were negative. In their submitted comments, Jules Evans, Principal at Avocet Research Associates, and John P. Kelly, PhD, Director of Conservation Science at Audubon Canyon Ranch wrote,

"Published evidence strongly suggests that estuarine birds may be seriously affected by even occasional disturbance during key parts of the feeding cycle. Fox et al. (1993) showed that American Wigeon (an abundant species in Drakes Estero) flushed from eelgrass feeding areas will abandon the area until the next tidal cycle unless the disturbance occurs early in the feeding cycle. Brant, which also feed tidally in eelgrass in Tomales Bay, display similar distributional responses (Henry 1984, Stock 1993).

Human disturbance of various types may reduce waterbird species diversity and abundance throughout the surrounding landscape of Drakes Estero and also at a broader regional scale (Boyle and Samson 1985, Rodgers and Smith 1997). Locally, increasing human use of natural areas increases incidence of disturbance and tends to disrupt foraging and social behavior of wildlife (Burger 1981, 1986, Klein 1993, Werschkul et al. 1976). Mori et al. (2001) found that distances between the position of a flush response and the disturbance source correlated positively with flock size and species diversity, and these distances were longer for waterfowl species that used open water for foraging than those that used it primarily for resting. The waters of Drakes Estero are used year-round by waterbirds for both for foraging and loafing (Shuford et al. 1989, pers. obs.)."34

Based on the level of cross-over impacts that may occur with the introduction of boat-in camping near a marine wilderness, water resources, increase in trash and pollution (including human waste), and disturbance to shorebirds; the DEIS should address these as "cumulative actions" that "when viewed with other proposed actions have cumulatively significant impacts and should therefore be discussed in the same impact statement." 40 C.F.R. §1508.25. Similar actions are actions which, "when viewed with other reasonably foreseeable or proposed agency actions, have similarities that provide a basis for evaluating their environmental consequences together, such as common timing or geography." id.

The shorelines of Drakes Estero should not be used to facilitate any camping development as part of this DEIS because the impacts to the Estero have not been analyzed.

## 5.2. Wetlands/Watershed Protection for Wilderness

The Central Coast Wetlands Group published a highly detailed study of coastal estuaries, which concludes that nearly 750,000 acres of historic tidal wetlands along the West Coast, including enormous swaths of Bay Area habitat, have disappeared largely as a result of development. The study highlights the most pristine estuary in the Bay Area is Drakes Estero, which has only lost 2.7 percent of historic tidal habitat while other Bay Area estuaries have lost 60 - 80 percent of historic areas.<sup>35</sup> In light of this study and the significance of Drakes Estero as a functional interconnected ecosystem, negative impacts to its beneficial uses of water should be fully mitigated or removed.



The DEIS notes,

"NPS programs and other sampling efforts have observed high concentrations of total suspended solids and nutrients in Drakes Bay and Drakes Estero watersheds ... Surrounding land uses such as ranches and pastures for dairies and other livestock operations contribute nutrients and sediment to Drakes Bay and Drakes Estero... 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 storm water runoff from pasture and grazing land, sewage systems, wildlife, boat discharges in the tidal and marine environment (outside the Planning Area)." 36

The DEIS also notes, "Drakes Estero provides critical habitat for Chinook salmon<sup>37</sup> and steelhead." 38

The DEIS excludes analysis of federally listed wildlife that utilize the unique habitat of Drakes Estero stating,

"Listed marine mammals (e.g. whales, seals, sea lions, sea turtles, and abalones) may use beaches adjacent to the planning area but are not included in this analysis because ranch activities would not affect these species in the planning area ...elephant seals are found immediately adjacent to ranch lands ...however, ranch operations do not affect them.(emphasis added)"<sup>39</sup>

This analysis fails to consider the cumulative impacts of ranching activities that includes trampling, erosion, and nutrient deposits from storage and distribution of manure that flows into the creeks that drain to beaches, wetlands, and wilderness areas that are not in the planning area but are adjacent and connected by ecological functions or species movement to new areas.

The DEIS should address the

"cumulative impacts on the environment which results from the incremental impact of the action when added to other past, present, and reasonably foreseeable future actions regardless of what agency (Federal or non-Federal) or person undertakes such other actions. Cumulative impacts can result from individually minor but collectively significant actions taking place over a period of time."

N. Plains Res. Council, Inc. v. Surface Transp. Ed., 668 F.3d 1067, 1076 (9th Cir. 2011) (emphasis added) (quoting 40 C.F.R. §1508.7). "A cumulative impact analysis 'must be more than perfunctory; it must provide a useful analysis of the cumulative impacts of past, present, and future projects.'" Id. (quoting Kern v. U.S. Bureau of Land Mgmt., 284 F.3d 1062, 1075 (9th Cir. 2002)). "To be useful to decision makers and the public, the cumulative impact analysis must include 'some quantified or detailed information; ... general statements about possible effects and some risk do not constitute a hard look absent a justification regarding why more definitive information could not be provided.'" Id. (quoting Ocean Advocates, 402 F.3d at 868).

The shoreline of Drakes Estero should have a 100-foot buffer from development and grazing activities, to protect sensitive resources and preserve wilderness values. The impacts of boat-in camping sites along the shores of Drakes Estero are not analyzed in the DEIS. Based on the 2012 Wilderness Designation of the Estero marine system, camping site designations should be removed.

## 6. Arbitrary Selection of Reduced Ranching Areas

Alternative D proposes new programmatic guidance and a Ranchland zone that would amend the 1980 General Management Plan and reduce grazing while also actively managing a natural resource (tule elk) through culling away from leased pastures. Alternative D would reduce grazing on approximately 7,500 acres, based on ranches with grazing-only leases and ranches with minimal infrastructure. However, the selected reduction area location is arbitrary.

The standard of review of an agency's EIS decision making is governed by the Administrative Procedure Act

(APA),

"Under the APA, we may set aside an agency decision if it is 'arbitrary, capricious, an abuse of discretion, or otherwise not in accordance with law.'" *Native Ecosystems Council v. U.S. Forest Serv.*, 428 F.3d 1233, 1238 (9th Cir. 2005) (quoting 5 U.S.C. § 706(2)(A)). "Review under the arbitrary and capricious standard is narrow, and we do not substitute our judgment for that of the agency." *Lands Council v. McNair (Lands Council II)*, 537 F.3d 981,987 (9th Cir. 2008) (en banc) (alterations and internal quotation marks omitted). However, an agency's decision can be set aside if: the agency relied on factors Congress did not intend it to consider, entirely failed to consider an important aspect of the problem, or offered an explanation that runs counter to the evidence before the agency or is so implausible that it could not be ascribed to a difference in view or the product of agency expertise. *Id.* (internal quotation marks omitted). Such actions would be "clear error[s] of judgment that would render [the agency's] action arbitrary and capricious." *Id.* at 993 (internal quotation marks omitted).

The selection criteria for reduced ranching fails entirely to consider cumulative and connected impacts with native species and foreseeable ongoing adverse impacts of changing conditions due to climate change. The Seashore's previous environmental assessments for other projects have included references to changing climate conditions as a cumulative impact, based on the potential to impact several resources.<sup>40</sup> Thus, NPS' selection of reduced ranching areas appears to be arbitrary as it fails to look at sea level rise, water quality concerns under the Clean Water Act, Endangered Species Act (ESA) protections, etc.

As noted in the 2018 Point Reyes National Seashore Sir Francis Drake Boulevard Improvement Project Supplemental Environmental Assessment /Subsequent Initial Study,

the Seashore is expected to "receive increased rainfall, more intense and frequent El Niño events, and a rise in sea surface temperature" as a result of climate change.<sup>41</sup> Climate change and sea level rise may "significantly alter coastal processes and nearshore ecosystem function."<sup>42</sup> Rising sea level is expected to cause "inundation of wetlands and estuaries... reduced nesting opportunities for birds[, and] detrimental effects on species that depend on the intertidal zone." Species currently inhabiting the park could be forced to relocate. "Changes in sea temperature could also result in...the collapse of food webs."<sup>43</sup>

Reduced ranching activities should be selected in order to reduce conflicts with and preserve and enhance habitat for natural resources. Instead, the reduced ranching criteria in the DEIS focuses on reducing impacts to financial commercial ranching operations.

The ESA defines critical habitat as,

(1) the specific areas within the geographical area occupied by the species, at the time it is listed...on which are found those physical or biological features (i) essential to the conservation of the species and (ii) that may require special management considerations or protection, and (2) specific areas outside the geographical area occupied by the species at the time it is listed...that...are essential for the conservation of the species. (16 U.S.C. 1532(5)(A)).

The selection criteria to remove areas from active ranching should be based on the best available science and legal authority and protections offered by laws such as the ESA and the Clean Water Act.

Specifically, mapping of sensitive resources and habitats that support species listed as Endangered or Threatened species including Steelhead Trout, Red Legged Frog, Western Snowy Plover, Ridgeway's Rail, and California Least Tern which are present in areas within and adjacent to the planning area should be conducted as part of the analysis of which locations ranching should be reduced in, so that NPS can be the most protective of the Seashore's protected and park resources. Decisions on management of habitats need to include connected actions that will cause impacts to resources outside the planning area.

## 7. Failure to Provide Financial Planning Analysis Necessary to Evaluate Alternative Actions

The DEIS proposes a significant change in programmatic resources management in the planning area. The total

costs to implement this plan are not available in the DEIS, thus making it difficult for the public to understand how NPS will implement this programmatic planning. The cost of implementing any of the alternatives will be substantial, and unless new funds can be identified, existing Seashore programs to protect the environment will be negatively impacted.

Pursuant to NPS Management Policies 2.3.1. specifies,

"The Park Service will maintain a general management plan for each unit of the national park system. The purpose of each general management plan, which will begin with the development of a foundation statement for the park unit, will be to ensure that the park has a clearly defined direction for resource preservation and visitor use. This basic foundation for decision-making will

be developed by an interdisciplinary team, in consultation with relevant NPS offices, other federal and state agencies, local and tribal governments, other interested parties, and the general public. The management plans will be based on full and proper use of scientific and scholarly information related to existing and potential resource conditions, visitor experiences, environmental impacts, and relative costs of alternative courses of action."44 (emphasis added)

Courts have held that agencies are not required to look the economic effects of a plan. *Ass'n of Pub. Agency Customers, Inc. v. Bonneville Power Admin.*, 126 F.3d 1158, 1186 (9th Cir. 1997); see also *City of Sausalito v. O'Neill*, 386 F.3d 1186, 1214 (9th Cir. 2004) (agency's cost-benefit analysis need not be monetary). That said, NEPA does require consideration of all of the direct and indirect effects of a plan, see 40 C.F.R. §1508.25, and the regulations expressly define the "effects" to be considered to include "ecological, aesthetic, historic, cultural, economic, social, or health" effects, 40 C.F.R. §1508.8 (emphasis added). In addition, when "economic ... and natural or physical environmental effects are interrelated," then an EIS must "discuss all of these effects on the human environment." 40 C.F.R. §1508.14.

In addition, an agency EIS cannot provide inaccurate or misleading economic information about a plan. *Nat. Res. Def Council v. U.S. Forest Serv.*, 421 F.3d 797, 811-12 (9th Cir. 2005). This is because "[i]naccurate economic information may defeat the purpose of an EIS by impairing the agency's consideration of the adverse environmental effects and by skewing the public's evaluation of the proposed agency action." *Id.* (finding agency's overestimation of revenue from plan "subverted NEPA's purpose of providing decision makers and the public with an accurate assessment of the information relevant to evaluate the ... Plan").

The DEIS fails to provide any information about the costs of the programmatic planning. This omission fails to satisfy NEPA's requirement that an EIS "ensure that agency action is fully informed and well considered." *Id.* (quotation omitted). In general, an EIS must be revised "[w]here the information in the initial EIS was so incomplete or misleading that the decisionmaker and the public could not make an informed comparison of the alternatives." *Id.* (emphasis added). Significant costs of enforcement and mitigation have been completely ignored in the DEIS, which makes it difficult for the decisionmakers and public to make an informed decision.

## 8. Management of Tule Elk

The Seashore is the only national park with a native population of tule elk. The elk have been prevalent in the Bay Area and Marin for thousands of years, long before their extirpation in the 19th century. Tule elk are considered natural resources and constitute an important part of the Seashore's ecosystem. Although tule elk are not a listed species, they are an important economic and natural resource for the Seashore that should be considered in addition to the lease /permit obligations that the Seashore holds. Removal of the Drakes Beach herd will have negative impacts to visitor experiences within the Seashore.

Any strategies to manage the elk populations should be in the context of managing resources like other natural resources within the Seashore and not for the benefit of commercial lease holders.

The GMPA should protect and manage natural resources, including tule elk, with conservation of these resources as the highest priority, as mandated by the Seashore's mission and current NPS management policies. Long-term leases and overall management strategies should strive to reduce conflicts and find non-lethal management strategies to balance and accommodate the presence of elk and cattle.

## 9. EAC is supportive of Alternative B, with Modification

EAC is supportive of Alternative B with modifications, as discussed in this letter, that strike proposed actions that are outside of the scope of the NEPA process and eliminate programs and actions from the DEIS where there was a failure to address significant impacts. This section of our letter indicates some specifics as to what should be included in a future alternative and what considerations need to be removed from a future alternative.

### 9.1. Modifications needed for Alternative B

- 1) Remove all types of diversification from DEIS consideration and programmatic planning as the DEIS does not evaluate cumulative, direct or indirect impacts, connected actions, or reasonably foreseeable outcomes of diversification.
- 2) Remove the proposed boat-in camping on the shorelines of Drakes Estero Marine Wilderness, because the DEIS fails to analyze the impacts to the Estero.
- 3) Revise development of Ranchland Zoning so that it prioritizes holistic planning areas and resource protection buffers that are connected to sensitive resources, watersheds, and wilderness areas that are within and outside of the planning area. The Ranchland Zoning also needs to consider future impacts from climate change including rising sea levels. To protect park resources these protections should be prioritized over ranching activities. Additional maps for the public should be developed that identify current restoration projects and sensitive water resources that are outside the planning area but are impacted by development within the planning area.
- 4) Impacts of climate change should be addressed as a cumulative impact as it has been analyzed in past environmental impact statements issued by the Point Reyes National Seashore. The Point Reyes National Seashore was identified in the 2018 Sea Level Rise and Storm Surge Projections for the National Park Service, as a park with potential future inundation and storm surge under four greenhouse gas emissions scenarios<sup>45</sup>. The DEIS fails to address the topic and foreseeable impacts of climate change.
- 5) Require development of ROAs to be evaluated as Resource Management Plans that consider all the foreseeable impacts on park resources before the issuance of the Final EIS. This may be accomplished with a supplemental update of the DEIS so that the current impacts of specific operations of beef and dairy ranching are analyzed and to the extent that current ranching operations impair park resources, those impairments should be cured.
- 6) To keep within the delegated authority and be consistent with the park's purpose, NPS must focus continuation of ranching on cultural and historical significance of multi-generational beef and dairy ranching in the Seashore and should not open ranching operations through competitive bidding process to the general public. Opening the Seashore to outside operators would have significant impacts on the park's cultural and historic values. The DEIS fails to analyze these impacts, and even fails to provide enough detail about the RFP process to say what the impacts may entail, or when they may occur.
- 7) Update maps to include locations of NPS and rancher restoration plans for water quality, special status species, and other important plant and animal communities. These maps need to be generated for the Seashore and should inform the development of the individual maps for Ranchland zones to inform placement of Resource Protection Zones and Pasture Zones.
- 8) Revise the reduce ranching alternative to be based on the best available science and applicable legal authority .

9) Provide the financial budget for implementation of the GMPA so that public can understand how the Seashore will implement the GMPA and ensure the plan is fully informed and well considered.<sup>45</sup> United States Department of Interior, National Park Service, Natural Resources Stewardship and Science office, Sea Level Rise and Storm Surge Projections for the National Park Service, (2018).

10) Eliminate culling of tule elk: Consistent with the park's management goals and directives, NPS management of tule elk would occur only to support other resource protection needs and management goals. New herds would be allowed to continue, regardless of geographic location if they do not move outside Point Reyes. Authorized animal units for each ranch would be adjusted as needed to meet residual dry matter goals. Resource protection is the highest value for the Seashore as intended by Congress in requiring the Department of the Interior to administer its Point Reyes lands "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. Sec. 459c (6)(a) (emphasis added).

11) Add a requirement for numeric water quality testing of surface waters (including the wilderness area and all recreational bodies of water). The best available science on water quality in, and hydrologically connected to, many parts of the planning area are outdated by as much as 20 years. While NEPA does not require the Seashore to collect data prior to issuing a DEIS, the Seashore cannot adequately monitor mitigation measures and enforce ROA terms with extremely outdated data. Consequently, the NPS must test water quality both now, and on an ongoing basis in the future. Otherwise, the DEIS mitigation terms regarding water quality are empty promises to protect public resources.

## 10. Conclusion

In sum, EAC urges NPS to adopt alternative B with modifications, as discussed in this letter, including the complete removal of all diversification. The Seashore's highest values are the protection of Wilderness, Scenic and Coastal Landscapes, Marine, Estuarine, and Freshwater Environments, Diversity of Habitats and Native Species, Maritime Cultural Landscapes, Continuum of Human Use, and Opportunities for Inspiration and Recreation. Resource protection is the highest value for the Seashore as intended by the 16 U.S.C. Sec. 459c (6)(a) where Congress elaborated on this statement by requiring the Department of the Interior to administer its Point Reyes lands "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,..."

### Footnotes:

1. 54 U.S. Code (U.S.C.) § 100101. (a) In General - "to promote and regulate the use of the National Park System by means and measures that conform to the fundamental purpose of the System units, which purpose is to conserve the scenery, natural and historic objects, and wild life in the System units and to provide for the enjoyment of the scenery, natural and historic objects, and wild life in such manner and by such means as will leave them unimpaired for the enjoyment of future generations."

2. 54 U.S.C. § 100502. General management plans. "General management plans for the preservation and use of each System unit, including areas within the national capital area, shall be prepared and revised in a timely manner by the Director. On January 1 of each year, the Secretary shall submit to Congress a list indicating the current status of completion or revision of general management plans for each System unit. General management plans for each System unit shall include - (1) measures for the preservation of the area's resources; (2) indications of types and general intensities of development (including visitor circulation and transportation patterns, systems, and modes) associated with public enjoyment and use of the

- area, including general locations , timing of implementation, and anticipated costs; (3) identification of and implementation commitments for visitor carrying capacities for all areas of the System unit ; and (4) indications of potential modifications to the external boundaries of the System unit, and the reasons for the modifications"
3. 16 U.S.C. § 459c. Point Reyes National Seashore; purposes; authorization or establishment. "In order to save and preserve, for purposes of public recreation, benefit, and inspiration, a portion of the diminishing seashore of the United States that remains undeveloped ... "
  4. United States Department of the Interior, National Park Service (NPS), Point Reyes National Seashore Draft Foundation Document, (July 2019), 3.
  5. United States Department of Interior, Secretary of Interior, Memorandum re: Point Reyes National Seashore - Drakes Bay Oyster Company, (November 2012), 7.
  6. United States Department of the Interior, NPS, Delegation of Authority for Point Reyes National Seashore Agricultural Leases and Directions to Implement the Secretary's Memorandum of November 29, 2012, (January 31, 2013).
  7. United States Department of Interior, Point Reyes National Seashore, Draft Succession Policy for Ranch Operations within the Ranchland Zone for Point Reyes National Seashore and the North District of Golden Gate National Recreation Area (August 2019).
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#7565

Name: Watt, Laura

Correspondence: Dear Superintendent Muldoon:

Thank you for the opportunity to provide comments on the Point Reyes National Seashore and Golden Gate National Recreation Area (PRNS/GGNRA) Draft General Management Plan (Draft GMP) Amendment and Draft Environmental Impact Statement (DEIS).

My relevant expertise includes over thirteen years as a professor of environmental history, policy, and planning at Sonoma State University, and twenty years of experience researching the history and management of PRNS, recently published by the University of California Press as a book titled *The Paradox of Preservation: Wilderness and Working Landscapes at Point Reyes National Seashore*. In addition, I have four years' experience working professionally as an environmental consultant for EDAW Inc. (now AECOM), focusing primarily on writing land management plans and EISs for federal agencies; in particular, I was project manager and primary author for the BLM's 2004 King Range National Conservation Area Resource Management Plan and EIS, which won an award for "NEPA Excellence" from the National Association of Environmental Planners. Many of the issues addressed in the King Range NCA plan are quite similar to those found at Point Reyes.

I would like to register my strong support for the continuation of ranching-both beef and dairy production-on lands managed by PRNS. As I wrote in my recent book, "The U.S. national park system contains areas that primarily aim to preserve natural scenery as well as those that primarily preserve history and cultural heritage; Point Reyes offers the suggestive possibility of protecting all types of heritage resources together as a landscape whole and including the resident users' input in management, rather than separately. The continued presence of the ranches at PRNS alludes to the strength of such a broader approach, one more based in community collaboration, with implications for how we humans might better understand nature's role in a human-built world." I still believe this current planning process is an excellent opportunity to align the Seashore's management practices with this broader, community-based approach, and yet I see little evidence of it in the Draft GMP and DEIS documents.

My view is echoed in the attached article by Rolf Diamant (Attachment 1), retired Superintendent of Frederick Law Olmsted National Historic Site and Marsh-Billings Rockefeller National Historic Park, published at the start of this planning process two years ago in the George Wright Forum.<sup>2</sup> In his essay, Diamant urges PRNS planners to "take a fresh look at ways to establish a more proactive, cooperative, and mutually beneficial relationship between ranching families and the seashore" (p. 118). He emphasizes the cultural significance of the ranching landscape, and specifically suggests longer-term leases, based on the model of Cuyahoga Valley National Park. I wholeheartedly agree with his essay, and am dismayed to not see its advice being followed in the Draft GMP and DEIS. I hope these suggestions will assist in your planning efforts as they move forward:

#### 1. Congressional Commitment to Protecting Active, Continuing Agriculture at Point Reyes

I would like to remind you of the widespread interest in and commitment to protecting agriculture within the Seashore, even among environmentalists, stemming back to the first discussions of creating PRNS. When Point Reyes National Seashore was established in 1962 it was primarily intended to provide beach access and recreation opportunities for the nearby population of the metropolitan Bay Area, even though the landscape had been in use for dairy and beef ranching since the 1850s. Initially, ranches were to be kept in private ownership, within a designated "pastoral zone." But for a variety of reasons they had all been acquired by the NPS by the early 1970s. The explicit intent of Congress in authorizing the acquisitions was that ranching activity remain part of the seashore, as stated by Senator Alan Bible, "At the time the initial authorizing legislation for Point Reyes National Seashore was enacted the federal government in effect made a promise to the ranchers in the pastoral zone that as long as they wanted to stay there, to make that use of it, they could do it. We must [now] keep our word to these people."<sup>3</sup>

I believe that these historical intentions must be kept in mind as the Seashore moves forward with its GMP Amendment process, particularly to avoid a form of "mission creep" where commitments made early on in the park unit's history are downplayed or overlooked as time goes by. I have seen suggestions recently by some members of the public that there has always been an intention to eventually remove all ranching from the Seashore; that is completely false, the original and continuing commitment to ranching is well-documented, and the GMP amendment and EIS should make that point abundantly clear. 2. Retain all existing ranches, strengthen the ranchers' ability to manage their lands, and recognize that the ranches, as eligible historic districts, are equally valuable and essential resources to PRNS as any natural resource or endangered species

Despite the long history of Congressional intention detailed above, the number of working ranches (i.e. not just the acreage of land used for grazing) within the boundaries has dwindled significantly since the Seashore was established-hence I do not support any of the alternatives that reduce or remove either dairy or beef ranching from PRNS or GGNRA lands. Both the Point Reyes Ranches and the Olema Valley Ranches have already been listed on the National Register of Historic Places as Historic Districts; this formal recognition of the ranches' importance to the overall history and sense of place at the Seashore is barely mentioned in the Draft Plan and DEIS. Removing the ranches, as proposed in Alternatives D, E, and F would irreparably destroy these historic districts, which were just formally listed last year. Furthermore, there is no recognition in any of the alternatives that historic districts protect historic land uses and practices as part of the overall cultural landscape, not just the historic structures.

The agricultural operations on PRNS and GGNRA lands represent a substantial portion of this economy, contributing 17 percent of Marin's overall agricultural production and 17 percent of its agricultural land base.<sup>4</sup> The 2007 Marin Countywide Plan lists among its core goals the protection of the area's working agricultural landscapes, and greater community food security by increasing the availability and diversity of locally-produced foods.<sup>5</sup> Grazing on these lands also provides important ecosystem services, such as managing non-native weedy species and reducing fire danger. And most of the ranching families have historic connections to the land that go back through generations, helping to anchor the overall community's sense of identity and place.

This planning effort also must give close attention to assisting the present-day ranches with remaining economically viable, so that there is no further erosion to these important cultural landscapes. One way to



increase their long-term viability would be to offer 20-year rolling leases, with automatic renewals each year that ranches remain in compliance (the NPS could retain its 30-day cancellation clause for non-compliance). This would give the ranching families, particularly the younger generations, greater security and encourage their willingness to invest in long-term maintenance of their leased properties and structures.

The GMP Amendment should also encourage re-use of ranches that have gone out of operation, like the Horick (D) Ranch, Rancho Baulines (Wilkins Ranch), and/or the Jewel Ranch, to bring them back into the overall continuing landscape of agriculture at the Seashore. In addition, establish Best Management Practices for ranching, including brush and weed control fencing, water system improvements, and variable stocking density (based on climatic factors rather than a set stocking limit), and streamline the approval process for maximum flexibility for the ranchers. NPS policies should encourage and support thoughtful and timely stewardship of the land, and particularly support management practices that can assist with carbon sequestration in the soil.

3. NPS should follow well-established international polity approach to living, continuing landscapes, as outlined UNESCO.

At the international level, world heritage management policy is increasingly articulated as the protection of both cultural and natural resources and values, emphasizing local uniqueness and community input into management. For example, UNESCO's 2009 World Heritage Cultural Landscapes: A Handbook for Conservation and Management identifies six guiding principles in its management framework:

1. People associated with the cultural landscape are the primary stakeholders for stewardship. 2. Successful management is inclusive and transparent, and governance is shaped through dialog and agreement among key stakeholders. 3. The value of the cultural landscape is based on the interaction between people and their environment; and the focus of management is on this relationship. 4. The focus of management is on guiding change to retain the values of the cultural landscape. 5. Management of cultural landscapes is integrated into a larger landscape context. 6. Successful management contributes to a sustainable society.<sup>6</sup>

I am astounded to see no mention of these guidelines in Draft GMP Amendment and DEIS; it is an embarrassment that U.S. management of cultural landscapes is so far out of step from the rest of the world. These planning documents should particularly recognize that the pastoral areas of the Seashore are "continuing landscapes," that they are not only important due to their historic influence on the land, but also due to their current-day uses and continuing influences.

4. The NPS must take PRSRA seriously as a collaborative management partner; not just an ordinary ' member of the public. "

The international policy approach to managing continuing landscapes outlined above makes clear the importance of working with local communities as primary stakeholders and management partners. In the case of PRNS, this highlights the essential importance of recognizing the Point Reyes Seashore Ranchers Association (PRSRA) as an organization that collectively represents the ranchers and their interests. These planning documents should direct Seashore staff should work collaboratively with this group to develop and maintain management of these pastoral landscapes, at a level that goes beyond just a regular member of the visiting public.

5. The NPS should establish an Advisory Committee to assist the NPS on issues of agricultural land management.

To provide additional agriculture expertise, NPS should establish a PRNS Agricultural Advisory Committee, made up of local agricultural and natural resource conservation experts including members from the local offices of the USDA Natural Resource Conservation

Service, the Marin County Resource Conservation District, the Marin County Agricultural Commissioner's Office, the University of California Cooperative Extension, and the Marin Agricultural Land Trust. This group should advise PRNS decision makers on all agricultural planning and management decisions.

6. Establish a leasing program and management arrangement similar to that already in place at Cuyahoga Valley National Park.

PRNS could easily follow the model of Cuyahoga Valley National Park (CVNP), with its Countryside Initiative bringing agricultural use back to parts of that park after decades of absence. Starting in 1999, CVNP has worked with a non-profit cooperating partner, the Countryside Conservancy, to reestablish working agriculture via rehabilitating historic farms and farmland and offering long-term leases, up to sixty years in length, via a competitive proposal process as a way of resurrecting and maintaining the rural character of the valley.<sup>7</sup>

Point Reyes could establish a similar relationship with Marin Agricultural Land Trust, which has an established track record of working well with local ranchers to conserve their lands, or some other non-profit focused on cultural landscape protection and management. The non-profit could serve as an intermediary partner, negotiating lease terms (again, ideally with rolling terms), working with ranchers to maintain land management practices, and generally buffering their tenant/landlord relationships with the NPS. It would also be essential to provide a clearer, more permanent avenue for community collaboration, viewing the ranchers and other locals as stakeholders in Seashore management and planning, distinct and separate from the general visiting public (see Point #4 above). The NPS needs to recognize that residents have a different relationship to place than visitors, and particularly that working the land, especially over generations, creates a unique connection and knowledge that should be respected and incorporated into management practices.

7. The preferred alternative should exclude tule elk from leased ranches.

Herds of tule elk are currently having significantly negative impacts on many of the working ranches and should be relocated out of the Seashore's pastoral zone entirely-including both the Drakes Beach herd and the Limantour area herd, the latter of which is not addressed by any of the alternatives. Removal via lethal means is not necessary; tule elk were transported from Tamales Point to the Limantour wilderness in 1998 via helicopter, and there is no reason this method, or transportation via livestock trailers, could not happen again.

The animals should be relocated after construction of a separation fence to keep elk in the larger Phillip Burton Wilderness, which the DEIS dismisses as not being cost-effective without adequate analysis. An elk fence could be designed and located to be only about four miles long, from the ocean's edge to the Inverness Ridge where it could end in dense vegetation, a wooded area, or at a significant drop off. A livestock fence already exists in this area, so it is readily accessible to build an elk fence, and such a fence could easily be designed to let smaller wildlife pass through while keeping the elk in the wilderness area, where they were originally intended to be. The cost of building and maintaining such a fence would be much less costly than ongoing hazing of elk, repair of ranch fences damaged by elk, and lethally removing elk from the ranching areas.

In 2015 I published an article, which I am also attaching to this comment letter (Attachment 2), that details the history of tule elk across California and specifically at PRNS.<sup>8</sup> This research clearly shows that both NPS staff and wildlife scientists have been aware since the mid-late 1990s that elk relocated to the Limantour area and allowed to "free range" would inevitably be drawn toward managed pastures and negatively impact ranching operations. The Limantour and Drakes Beach herds have become problems over the past twenty years through NPS inaction, not following the guidelines established in your own 1998 Tule Elk Management Plan. Returning both of these herds to the designated elk range near Limantour and building a separation fence to prevent them from returning to the pastoral zone will both avoid future conflicts and result in a more independent herd of elk free-ranging southward into the wilderness zone.

Furthermore, the planning documents should include a target population size for the tule elk in the wilderness area, and identify mechanisms for addressing circumstances of overpopulation. Tule elk at Point Reyes have proved to be prolific, and with almost no predators to keep their numbers in check, are likely to reproduce beyond the capacity of their environment to support them. This has already happened numerous times in the past, so to not address this possibility in the GMP Amendment seems short-sighted. I hope that these comments will assist you and your staff with developing a strong and effective vision for the historic and continuing ranching

landscapes within the Seashore and PRNS-managed areas of the GGNRA. I will of course remain engaged with the process, and am happy to offer assistance as a scholar and planning professional at any time.

[Attached: Point Reyes: A Landscape Invisible, Letter from Woodstock, Rolf Diamant]

#### FOOTNOTES:

1 Laura Alice Watt, 2017, *The Paradox of Preservation: Wilderness and Working Landscapes at Point Reyes National Seashore* (Oakland: University of California Press), at 4. 2 Rolf Diamant, 2017, "Point Reyes: A Landscape Indivisible?" *George Wright Forum* 34(2): 113-19. 3 U.S. Congress, Senate Congressional Record, March 17, 1970, page S3823, written statement by Senator Alan Bible, discussing the amendment to repeal Section 4 in the 1962 legislation that established the pastoral zone; emphasis is mine. 4 Ellie Rilla and Lisa Bush, 2009, *The Changing Role of Agriculture in Point Reyes National Seashore*, published by the University of California Cooperative Extension. 5 Marin Countywide Plan, adopted November 6, 2007. 6 UNESCO, 2009, *World Heritage Cultural Landscapes: A Handbook for Conservation and Management*, at 35-36. 7 <http://www.cvcountryside.org/>

#7566

Name: N/A, N/A

Correspondence: Ranchers within Point Reyes National Seashore (PRNS) and the North District of the Golden Gate National Recreation District (GGNRA) appreciate the opportunity to comment on the General Management Plan Amendment Draft Environmental Impact Statement (DEIS). This comment letter is intended to augment the DEIS comment letter sent by the Point Reyes Seashore Ranchers Association by providing more detail on some of the important topics included in the DEIS.

We look forward to the appropriate revisions in the final EIS. Sincerely,  
PRNS and GGNRA Family Ranchers

We recognize that NPS and its EIS planning contractors dedicated significant effort to produce this Draft Environmental Impact Statement and believe that the draft is generally very good. On many topics, NPS seemed to have adequately analyzed the issues and arrived at reasonable conclusions. Alternatively, on agricultural issues, some of the analysis misses important facts and therefore arrives at wrong conclusions -conclusions and restrictions that nullify what appears to be a goal - viable and sustainable dairy and beef ranches within the historic dairy and ranching districts on Point Reyes and the Olema Valley. The DEIS is written as if the Seashore is solely responsible for rangeland management in Point Reyes. There are 20 references in the document to "range management" and every one is a reference to NPS guidelines. Point Reyes and Olema Valley ranchers are experienced rangeland managers, yet key documents supporting the DEIS, including a recent Grazing Plan, were developed without consultation with the ranchers. Point Reyes ranchers have spent countless hours over the past several years attempting to engage with the Seashore's ranch-planning processes, but ranchers' expertise and knowledge have been overlooked in this DEIS.

The following targeted comments are intended to correct and improve the EIS so that ranching can persist in the planning area, ranchers can become more connected with the local community, nutrient management and grazing activities can reduce atmospheric carbon, natural resources can be protected, and visitor experience can be improved.

#### EXECUTIVE SUMMARY:

This section highlights some of the comments and recommendations of the undersigned ranching families whose livelihoods depend on continued ranching on the limited acreage of agricultural property within the Point Reyes National Seashore (PRNS) and the northern district of the Golden Gate National Recreation Area (GGNRA). We

support the varied uses and environmental value of the PRNS and the GGNRA and believe the National Park Service (NPS) has developed a draft environmental impact statement (DEIS) for the General Management Plan Amendment (GMP Amendment) that raises many of the important issues related to dairy and ranch management. However, we believe the GMP Amendment and the preferred alternative have overlooked several key issues and must be better designed to recognize the historical, cultural, social, educational, scenic, and environmental values and opportunities of the working dairies and ranches in the limited area of the PRNS and GGNRA recognized as the Point Reyes

Peninsula Dairy Ranches Historic District and the Olema Valley Dairy Ranches Historic District.

1. Establish an Advisory Committee to assist NPS on agricultural issues. To provide additional agriculture expertise, NPS should establish a PRNS Agricultural Advisory Committee, made up of local agricultural and natural resource conservation experts including a member from: the local office of the USDA Natural Resource Conservation Service, the Marin County Resource Conservation District, the Marin County Agricultural Commissioner's Office, the University of

California Cooperative Extension, and the Marin Agricultural Land Trust to advise PRNS decision makers on all agricultural planning and management decisions.

2. The Draft "Foundation Document" must be revised to recognize the existence and importance of ranching as part of PRNS. The draft Foundation Document will provide basic guidance for planning and management decisions. The draft Foundation Document is significantly deficient because it mostly fails to recognize historic and culturally important dairy and ranching. The Document contains several sections including Park Purpose, Park Significance, and Fundamental Resources and Values. All these sections should be revised to recognize that the ranches can help to perpetuate the coastal grassland ecosystem, increase environmental awareness, promote the ethic of land stewardship and sustainable agriculture, support the local foodshed, and continue to favorably influence regional trends in the way food is produced, distributed, and consumed.

3. The DEIS seriously misleads the public and distorts the no-action alternative because it assumes no limit on the population level or geographic extent of tule elk at PRNS. The current applicable plan for tule elk at PRNS is the 1998 Tule Elk Management Plan and EA. The Elk Plan "did not contemplate the expansion of elk into the ranchlands." DEIS p.5. However, the no action alternative (which is used as a reference to describe the impacts and change that would occur in other DEIS alternatives) characterizes those alternatives as a reduction in the existing population level and the wide geographic spread of elk. In fact, given that the 1998 Elk Plan did not provide for elk on ranchland, the EIS must disclose that the alternatives that allow elk on ranchland amount to a huge and significant increase in elk. The failure to accurately characterize the current Elk Plan limitation that precludes elk on ranchland, distorts the effects of the alternatives in violation of the National Environmental Policy Act (NEPA). The NPS also violated NEPA and other management direction when it failed to exclude elk from ranchlands and follow the 1998 Elk Plan.

4. The preferred alternative must have a map that clearly establishes a limit on the geographic extent of tule elk. The only map regarding tule elk is Figure 2 which shows the current extent of elk in the planning area. DEIS A-2. The preferred alternative should include a map of the location where elk are permitted. Without a map of the permitted area, resource conflicts will arise.

5. The preferred alternative should exclude elk from the ranch land. Elk should be allowed on the PRNS but the Drakes Beach herd and the Limantour herd should not be present on the limited area of the PRNS which has ranches. This is for several reasons. Over the last 20 years NPS has not figured out how to effectively separate elk from cows; it would be better for elk if they are allowed to roam undisturbed in a much larger natural habitat in the Phillip Burton Wilderness instead of being subject to harassment, hazing, and lethal removal on ranch land; the elk consumption of forage will threaten the organic certification of ranches; elk damage ranch fences; and elk consume forage that would otherwise be available to support cattle. Additionally, elk were not part of the Dairy Ranches Historic Districts.

6. A fence should be constructed to effectively separate elk between the ranches and the Phillip Burton Wilderness area. The DEIS dismisses the possibility of an elk fence to keep elk in the larger Phillip Burton Wilderness. The elk fence could be designed and located to be only about 4 miles long, to terminate on the Inverness Ridge in dense vegetation, a wooded area, or at a significant drop off. A livestock fence already exists in this area, so it is readily

accessible to build an elk fence. We believe the cost would be reasonable and, together with maintenance costs, would be much less costly than ongoing hazing, repair of ranch fences damaged by elk, and lethal removal of elk.

7. The preferred alternative must establish a population level for the maximum number of elk in the areas where elk are permitted. In addition to providing a map that delineates the location where elk will be permitted, the EIS should set the maximum number of elk allowed in the area delineated. The number will guide management decisions and determine when the herd is beyond the permitted management capacity.

8. The analysis of diversification in the DEIS is incomplete and lacks historical and regional context. The DEIS gives the public the false impression that the diversification sought by ranchers is new and expansive. The final EIS should explain that farming and ranching outside the planning area is far more diverse. In addition, within the planning area, farms and ranches historically included both irrigated and non-irrigated row crops (such as beans, peas, barley, artichokes and other vegetables), a wider variety of livestock species (such as hogs and sheep), on-farm processing and on-farm sales.

9. The limitation of row crops to 2 ½ acres, permitted only in the ranch core, prohibiting irrigation and compost, is unnecessarily restrictive and will not meet NPS goals. We appreciate the consideration of allowing ranches to diversify with some row crops. However, the limitations are so restrictive that they will not allow NPS to meet its goal for ranchers to respond to poor forage production years and fluctuations in economic markets. Only 2 ½ acres for the 24 ranching families amounts to less than 75 acres out of the 28,000 acres of ranch land. The core restriction is unreasonable because there may be more suitable soil for row crops outside the ranch core. Prohibiting irrigation severely limits crop varieties that can be grown. Pathogen free, weed-free mulch should be allowed since weed-free straw is not available inside the planning area. The baseline restriction should allow up to 75 total acres of row crops within the planning area, on suitable soils within the ranch core and pasture subzones, using organic mulch, and irrigation if excess water is available. We do not anticipate all ranches would elect to grow row crops. Interested ranchers would make proposals for this type of diversification through the Ranch Operating Agreement process with options exercised up to a 75-acre total being reached across all ranches in the planning area.

10. The diversification that allows sheep and goats is too restrictive and will not achieve NPS goals of preserving open coastal grasslands. Diversification to allow sheep and goats could be helpful since these animals reduce the fuel load and graze on brush which encroaches on grasslands threatening open vistas, wildlife habitat, and native plants. Unfortunately, in the DEIS sheep and goats are limited to the ranch core and pasture sub-zones. Management to limit brush encroachment in these subzones is already allowed such as planting, mowing, hay and silage production. These management practices are prohibited or more limited in the range subzone. NPS should provide more flexibility to allow sheep and goats to browse within the range subzone where there is a more significant threat to grassland by wildfire and brush encroachment and fewer tools available to control the brush.

11. The DEIS fails to recognize the environmental benefits of diversified farming and ranching. Diversified agriculture can provide important wildlife habitat and soil conservation benefits that should be considered in the DEIS. For example, vegetable waste from row crops can be fed to hogs and the hog manure can be composted with other organic materials to use on row crops or pastures.

12. NPS should consider educational benefits and enhanced visitor experience from diversification. We urge the Park Service to include other diversification such as minor on-farm processing, on-farm sales of products produced in the planning area, and farm tours. Small scale diversified farming will more correctly display the historic working landscapes within the historic dairy districts. This will help enhance the visitor educational and recreational experience goals stated in the DEIS Purpose and Need.

13. The beneficial impacts to soils from carbon farming was not considered. The DEIS only considers adverse impacts to soils as a result of dairying and ranching. The NPS should consider carbon farming and the ecological benefits of implementing a carbon farm plan that would improve soils, increase soil carbon, and increase organic matter to benefit water quality and air quality. The NPS should consult with the Marin Carbon Project, Carbon Cycle Institute, and Marin Resource Conservation District who have expertise in this area. There is no

justification to ignore the beneficial effects of carbon farming.

14. The DEIS incorrectly equates fertilizer to compost and prohibits both. The use of organic compost should be allowed on all ranches. The DEIS fails to understand the benefits of soil amendments and inputs on soil health. Pathogen-free and weed-free compost can improve soil fertility enhancing water retention to minimize runoff and help sequester carbon. NPS should consult with the Natural Resource Conservation Service, the Marin Resource Conservation District, and University of California Cooperative Extension Service to analyze the best nutrient management practices that can be used on both dairies and beef ranches to improve soil health.

15. Nutrient management should be allowed on beef ranches and not be limited to dairies. Dairies have more productive soils than beef ranches because dairies feed their cows nutrient rich concentrated feeds, they have more cows per unit area than allowed on beef ranches, and dairies spread manure on pastures, all increasing the fertility of the soils. The preferred alternative only allows soil fertility improvements on the pasture subzone, but soil fertility should also be allowed on the range subzone at least with compost on both dairies and beef ranches.

16. The DEIS fails to accurately assess air quality impacts from beef ranching relative to other uses of the PRNS. Since beef cattle spend most of their time on pastures and rangeland and not on bare ground and are just occasionally gathered for removal from ranch land, the DEIS conclusion that beef cattle are the primary source of dust is unsupported. The DEIS is also misleading because it concludes that ranching represents 87% of the greenhouse gas emissions while vehicle emissions from the several million seashore visitors is less than 20%. However, this DEIS ignores the emissions from vehicles as visitors drive to and from the planning area in the PRNS from wherever they originate.

17. It is unclear how the reserve account(s) would work. It is unclear whether one reserve account will be established that is available for maintenance on all the ranches or whether individual reserve accounts will be created for each ranch. It is equally unclear whether NPS would contribute to the reserve account given that NPS has not maintained the infrastructure on the ranches and if NPS should bear some financial responsibility to bring the infrastructure up to useable and safe conditions.

18. Ranch Operating Agreements should not require new NEPA review and ESA consultation every year. The DEIS states that "The ROA would be updated or reauthorized following the annual meeting." DEIS P.36. The DEIS does not define "updated" or "reauthorized." Both these terms, especially "reauthorized", indicate a new decision each year that will require NEPA review and ESA consultation. This will grind implementation of the Plan to a halt and create annual opportunities for litigation. This is not in the interest of the NPS, which has limited budgets and staff, and is not in the interest of accomplishing resource improvements, whose implementation will be repeatedly stalled. The annual meeting about the ROA and related documentation should be referred to as "implementation" of decisions previously made in the GMP Record of Decision rather than as updates or reauthorizations. Otherwise, an annual opportunity to attack and stall the decisions will be created which is not in the interest of good resource management.

19. Leases should not require lease holders to have their primary residence in the Park. Currently, not all lease holders have their primary residence in the Park, and it may not be feasible for every lease holder to have a primary residence in the Park. In the Final EIS, NPS should require that the lease holder or an immediate family member is the agricultural business owner and that the lease holder or an immediate family member is directly involved in day-to day operations. Subletting should not be allowed.

The following are the more detailed undersigned ranchers comments meant to inform the EIS process:

DEIS Exec Summary, page ii

DEIS states "strategies addressed in the EIS would not need additional compliance and may be implemented when the EIS process concludes". The ranch infrastructure and vegetation management approval process through the EIS is exactly what is needed for streamlined and fair management and will provide needed certainty without having to wait for another layer of planning. We appreciate this approach. With this approach, all environmental review (NEPA compliance) is done as a part of this process. Conversely, any future activity or use request not

analyzed during this EIS would be subject to its own potentially lengthy and costly NEPA process. During the public scoping for this process, as well as the public scoping for the halted Ranch Comprehensive Ranch Management Plan EA, ranchers set forth requests to re-establish some historic uses as well as add potentially new compatible uses on the ranches. In the DEIS, many of the suggestions have been analyzed, environmental consequences identified, and mitigation measures established. The problem is that some suggestions that were fully described in scoping have been dismissed without full analysis in the EIS. These items include: Re establish a small-scale dairy on a ranch that already has the necessary infrastructure (Grade-A milking barn, corrals, etc.) and a plan to mitigate manure and other potential impacts. Restoring historic dairying activity should not have been dismissed without consideration. The reasons given for dismissal in the DEIS are inaccurate and demonstrate why reestablishing a historic small-scale dairy and proactive and creative ways to mitigate manure and other impacts should be evaluated.

On-farm sales of products produced within the planning area, as allowed on farms throughout Marin County, was not analyzed. These activities coupled with farm tours could improve visitor experience and education as scoping letters described. All the benefits of these activities would far outweigh any minimal adverse effects and they should be fully analyzed prior to the release of the Final EIS. The effects of these activities are already covered in this DEIS - these effects should be considered in the context of on-farm sales and tours so that implementation could be allowed when the EIS process concludes, rather than requiring a new process after the fact to adopt on-farm sales and farm tours.

Many of the errors and omissions in the DEIS that result in misleading conclusions appear to be the result of having a lack of agricultural experience on the EIS team. The deficiency of agricultural expertise at PRNS has long been recognized by both ranchers and the community. Given this history, scoping from ranchers, public agencies, NGOs, industry groups and the general public suggested an Agriculture Advisory Committee to solve the problem of the lack of PRNS agriculture expertise. This suggestion was widely supported across varied commenters.

The scoping comments requested that this EIS process fully evaluate the benefit of establishing an agricultural advisory committee. Many commenters included this language:

"Establish an PRNS Agricultural Advisory Committee, made up of local agricultural and natural resource conservation experts including a member from each: The local office of the USDA Natural Resource Conservation Service, the Marin County Resource Conservation District, the Marin County Agricultural Commissioner's Office, the University of California Cooperative Extension and the Marin Agricultural Land Trust, to advise seashore decision makers on all agricultural planning and management decisions. "

The occasional and informal contacts made by NPS with those having agricultural expertise is insufficient and we strongly support a formal Agricultural Advisory Committee. If NPS does not want to establish an "advisory committee" under the Federal Advisory Committee Act, then there should be at least a diverse agricultural "advisory group" that NPS regularly consults with about agricultural issues. Including more competent agricultural issue advisors to the NPS decision making process would result in better decisions and more favorable environmental effects. This suggestion was made repeatedly by many diverse members of the public, and is directly related to management of agricultural lands, a key purpose of the EIS. However, the DEIS did not identify any reasons for dismissing this suggestion from analysis. The EIS must be corrected by including this topic as raised during the scoping process. In reading the DEIS, had the NPS included experienced agricultural and resource advisors, it is clear that conclusions and impacts of the plan on the human environment would be different - and in most cases, showing reduced adverse effects and increased positive effects.

## Chapter 1, Purpose and Need for Action

The DEIS says in the executive summary (page 4): "In 2013, at the direction of the Secretary of the Interior, the NPS Director [John Jarvis] issued a Delegation of Authority authorizing lease/permit terms for up to 20 years and directing NPS to initiate a National Environmental Policy Act (NEPA) process to evaluate the issuance of long-term leases."

There is no mention of a NEPA process in either the Salazar directive or the Jarvis delegation of authority. The reason that NPS decided to initiate a NEPA process following the directive to renew leases for the same use that has been ongoing for over 150 years is still unknown to the public. This EIS is misleading and must be corrected so that the actual reason for this EIS process is known to the public. A GMP update is overdue and attempts have been made to update the plan. This EIS should explain the important history, including the attempt to update the GMP by NEPA analysis beginning in 1998, and the later attempt to update the GMP by re initiating an EIS in 2003. This EIS must explain what happened to these attempts and why, after years of public involvement and years of NPS effort at significant cost to the taxpayer, the efforts

were aborted. This EIS should fully evaluate and present to the public an answer as to why the planning area is now limited to ranch land and not the rest of the seashore as was the case in previous efforts. If breaking GMP updates into sections is the new NPS process, why did the NPS start with the ranch lands? As presented, the public does not understand why and how this process is under way. The EIS must be revised to make this clear.

#### Point Reyes National Seashore July 2019 DRAFT Foundation Document

The NPS explains that the Foundation Document will "provide basic guidance for planning and management decisions—a foundation for planning and management." Draft Foundation Document p.2. The draft Foundation Document is significantly deficient because it fails to recognize historic and culturally important dairy and ranching. The section, "Brief Description of the Park" mentions the Drakes Bay Historic and Archaeological District and discusses many historic features of the PRNS but not once does the section recognize the Point Reyes Peninsula Dairy Ranches Historic District and the Olema Valley Dairy Ranches Historic District. That significant omission must be corrected. In contrast, the Cuyahoga Valley National Park Foundation Document's Description of the Park states that on some lands there is a "focus on the preservation of rural landscape while encouraging modern sustainable farming methods appropriate for a national park. Nearly a dozen of the farms, including historic buildings and associated lands, are managed to ensure continued agricultural use through long-term leasing under this program." Cuyahoga Foundation Statement p.5. The PRNS's Foundation Statement "Description of the Park" should include a similar statement.

The Park Purpose also does not reflect the role of dairying and ranching. The Foundation Document explains that the Park Purpose was derived through an analysis of enabling legislation and legislative history. Foundation Document p.3. Congress in the Conference Report for the Act "Making Further Continuing Appropriations For The Department Of Homeland Security For Fiscal Year 2019, And For Other Purposes" stated that "The Conferees note that multi generational ranching and dairying is important both ecologically and economically for the Point Reyes National Seashore and the surrounding community. These historic activities are also fully consistent with Congress's intent for the management of Point Reyes National Seashore." Conf. Rep. 116-9 at 720. In addition, H.R. 6687 also recognized the importance of dairies and ranches to the Seashore.

Unfortunately, the draft Park Purpose statement does not recognize the cultural, historical, scenic, and natural value of dairying and ranching in the PRNS. The draft Park Purpose is:

Established for public benefit and inspiration, the Point Reyes National Seashore protects a rugged and wild coastal peninsula and surrounding waters, connecting native ecosystems, enduring human history, and recreational, scientific, and educational opportunities. Foundation Document p.3.

The Park Purpose Statement should be revised to read:

Established for public benefit and inspiration, the Point Reyes National Seashore protects a rugged and wild coastal peninsula and surrounding waters, connecting native ecosystems, maintaining working landscapes, enduring human history of resource use, and recreational, scientific, and educational opportunities.

Alternatively, the Park Purpose Statement should incorporate the language of H.R. 6687:

Established for public benefit and inspiration, the Point Reyes National Seashore protects a rugged and wild coastal peninsula and surrounding waters, connecting native ecosystems, enduring human history, and



recreational, scientific, and educational opportunities. Consistent with Congress' long-standing intent, working dairies and ranches shall continue to be authorized to operate on agricultural property as part of the seashore's unique historic, cultural, scenic and natural values.

Next, the Foundation Document has a section entitled "Park Significance." There is only one bullet point on ranching that merely states that ranching occurs on the PNRS but fails to mention anything about its significance. It should be revised to read as follows:

The productive coastal grassland ecosystem supported by the fog-driven climate of the Point Reyes Peninsula was the basis for development of the area's historic dairy and beef ranch tradition. These Park ranches can help to perpetuate the coastal grassland ecosystem, increase environmental awareness, promote the ethic of land stewardship and sustainable agriculture, support the local foodshed, and continue to favorably influence regional trends in the way food is produced, distributed, and consumed.

The Foundation Document then has a section entitled "Fundamental Resources and Values." There is a paragraph on Scenic Coastal Landscapes that should recognize the unique coastal grasslands that are largely maintained by the ranchers whose livestock keep the brush down to maintain the grasslands. The Scenic Coastal Landscapes paragraph should be revised to read:

Scenic Coastal Landscapes. Shaped by ongoing geologic processes, marine weather, and human influence, the Point Reyes Peninsula juts 10 miles into the Pacific Ocean and encompasses more than 80 miles of wild beaches, dramatic cliffs, coastal grasslands, and detached coastal formations. Point Reyes National Seashore offers opportunities to observe and understand the interaction of land and sea from many perspectives, including geology, ecological disturbance, working landscapes, and climate change.

Additionally, the Foundation Document's "Agricultural and Rural Landscapes" section should be revised to read:

Agricultural and Rural Landscapes. The Point Reyes National Seashore has a rich agricultural heritage. These landscapes are preserved and protected in a zone of active,

ecologically sustainable ranches. Agriculture within Point Reyes National Seashore will continue to influence regional trends in the way food is produced, distributed, and consumed.

The final section of the Foundation Document is "Interpretive Themes." There is absolutely no mention of historic ranching and its role at PRNS in the interpretive themes. Additional paragraphs should be added to the interpretive themes like the Cuyahoga National Park Foundation's Document to recognize human influence and agriculture as follows:

The diverse array of natural, historical, and cultural resources in the Point Reyes National Seashore offer an interpretive opportunity and lessons of adaptability, ingenuity, and interdependence to illustrate trends in many disciplines including sustainability, ecology, and agriculture.

There is an opportunity for interpretation of cultural, historical, and natural interplay. The wide variety of cultural, historical, and natural resources in the Point Reyes National Seashore exists singly but also meld into a mosaic of pastoral landscapes that were created and continue to be transformed by the interplay of geologic, ecologic, and human influences. Understanding human interaction with the environment from American Indian to current ranching can serve to inspire and encourage discussion of land stewardship.

#### Diversification

On the DEIS page 20, under Diversification, NPS states: "Diversification of ranching activities allows ranchers to react to poor forage production years and fluctuations in the economic market." This statement would lead the reader to believe that the minor diversification activities allowed under this plan would help to achieve this goal. Two and one-half acres of row crops would not achieve this goal. What is missing from this analysis, and should be included, are the following:

1. Historic context in the planning area. This analysis, to be clear to the public, should include the full history of irrigated and non-irrigated row crop production in the planning area that included thousands of acres beans, peas, barley, artichokes and other vegetables. Also documented on these ranches were large numbers of other livestock species, including hogs, sheep and others. The historic time frame of these activities is the exact same time frame of the Historic Dairy Districts the NPS is entrusted to protect and, therefore, these activities are fully appropriate. By ignoring the history and cultural significance of row crops, the public is misled into believing that these diversification activities would be "new". With the historic context, the public would understand that by allowing these "diversification" activities, the NPS would be supporting the restoration of the historic use of the planning area.

2. Regional context of the planning area. The planning area is located within Marin County and represents nearly 20% of Marin County's agricultural land and nearly 20% of Marin County's agricultural production. Due to economic pressures, environmental pressures, changing markets, etc., Marin County supports the ranchers and farmers by streamlining permits and approvals for diversification activities, on-farm processing and on-farm sales. Ranchers within the planning area may not be able to compete with their counterparts outside the planning area. This difference could be eliminated if the EIS includes a full analysis of these activities and how the outcome of this plan compares with the uses permitted on other farm and ranch land in the region.

3. Two and one-half acres of row crops, where irrigation is prohibited, and permitted only in the ranch core (regardless of soil quality) does not meet the NPS stated goals or description of diversification "to react to poor forage production years and fluctuations in the economic market." By using this diversification descriptor, the public is misled into believing that an economic analysis was conducted to arrive at 2-1/2 acres. There is no such analysis in the DEIS and the economics must be evaluated. A full analysis will find that 2-1/2 acres of dry-farmed row crops has little economic value and in fact, with these unexplained strict limitations, would offer little help -if any- -to the ranchers.

4. Agricultural expertise is absent in the analysis of diversification, including row crops. Any expectation by the EIS team that 2-1/2 acres of dry-farmed row crops in the ranch core, coupled with the other restrictions, would make growing row crops on 2-1/2 acres economically viable is wrong. By ignoring an economic analysis, the public is misled. By applying the onerous restrictions not found on other farms, it is clear no one experienced in sustainable, organic row crop production was consulted. This EIS must be corrected by allowing an experienced team to review the scale and conditions of the diversification activities. The team may include members of the Marin Resource Conservation District to ensure natural resource protection, the University of California Cooperative Extension Service with hands-on experience with small-scale, organic farming activities and the economic data regarding these activities, The Marin County Agricultural Commissioner who can oversee Integrated Pest Management, the Natural Resources Conservation Service where soil, soil quality, soil health and erosion avoidance experts and a historian can help define historically appropriate activities within the planning area.

5. No reason or rationale is given in the DEIS to support the extremely limited size or scope of the diversification activities. Although no explanation is provided in the document, a member of the NPS EIS team was asked, at the open meeting at the West Marin School on August 27, 2019, "Why is NPS planning to limit row crops to 2-1/2 acres?" The NPS employee stated that "We did not want to allow a diversification activity that would make more money than the principally authorized use- dairy or beef". If this was a plan objective, it should be written so that the public is aware. If this is a plan objective, it will require expert agricultural consultants to do an economic analysis. Limiting economic return from diversification should not be a plan objective. If this is a plan objective, which it is according to the NPS employee, the NPS must analyze and explain why it is important to limit ranchers' ability to produce income. Moreover, the economic return from diversification that could help provide ranchers with funds to invest in infrastructure repair and maintenance should be included in the analysis.

6. Community context is absent in the analysis. Historically, the ranches within the planning area were very diversified. History shows many dairy, meat and vegetable products were produced, processed and sent to local markets - feeding the local communities. Post-World War II, ranches in the planning area lost most of their diversification and became cow-centered. Milk and beef were then shipped to distant markets, including out-of-

state markets and feed began to be imported from distant sources, including out-of-state sources. It was at this time, around the time when the Point Reyes National Seashore was created, the ranchers began to lose their connection with the local communities and the local food system. Much of Marin County's agriculture has begun to restore that connection through diversification of farm products that can be processed and sold locally. The ranchers have asked the NPS to allow the restoration of parts of this local, sustainable model in the planning area. The EIS must consider the value to both the rancher and to the local community to restore the food connections. The analysis must include analysis of the benefit of local food security, food safety, and the improved relationship between the NPS and its gateway communities.

7. Environmental consequences evaluated are one-sided. The DEIS goes into some detail about the adverse effects but does not evaluate the environmental benefit of diversified farming and ranching. Small diversified agricultural units can add important wildlife habitat and soil conservation compared to single use agriculture units. A systems approach to agricultural production in the planning area could allow, for example, vegetable waste from the row crops being fed to hogs and the hog manure being composted on farm with other organic materials for use on the row crops or on pastures, which leads to reduced transportation and increased carbon sequestration. Allowing a ranch to diversify will likely result in a reduction of adverse environmental consequences of the ranches within the seashore. The EIS does not consider this important issue of beneficial environmental impacts from diversification and must fully address these environmental consequences before the final EIS is released.

8. Enhanced visitor experience and education benefits from diversification are ignored. The Purpose and Need for this analysis has two goals: A) "Visitors have opportunities for diverse educational and learning experiences."; and B) "Visitors have opportunities to enjoy expanded connections and greater access to diverse recreation." Keep in mind that the visitor experience in this DEIS is limited to the working landscapes in the planning area. This DEIS did not analyze how diversification, as clearly requested through scoping, would help the NPS meet these goals. Some ranchers have requested the authority to diversify their farm products, do some minor on-farm processing in existing infrastructure, have some on-farm sales of products produced within the planning area and offer farm tours to the visiting public. Currently, NPS has very little visitor interpretation of the historic ranching areas so the public is being denied an opportunity to enjoy and learn about this historic and cultural resource. The visiting public could learn about the row crops and other farm and ranch activities, learn the history of the area, learn about how food production and natural resource conservation can be complimentary and could leave with a taste of the seashore products. This EIS must fully analyze the benefits to the visiting public, including the fact that the benefit would come with NPS oversight and at little cost to the taxpayer.

9. The ranch core may not be the most appropriate site for row crops. This DEIS would limit row crops to the ranch core or adjacent to the ranch core. It may be, on some ranches, that the ranch core is not where the most appropriate soil conditions exist for row crops. An allowance should be evaluated for circumstances where a different siting of row crops is appropriate.

10. Irrigation of row crops is prohibited under the DEIS. It is an unusual challenge to dry farm row crops. Because of the typical 6-month annual drought, most row crops in the region are irrigated. This planning area restriction would make any successful row crops in the planning area highly unlikely. It would also increase the cost of production, making it difficult to compete with other local producers in the region located outside the planning area. No data or analyses were provided in the DEIS to support the prohibition on irrigation. This DEIS, before simply prohibiting what has been an ongoing use, must evaluate the consequences of the decision. There have been no conflicts or significant environmental impacts from existing irrigated row crops identified. The EIS must evaluate allowing reasonable water use irrigation techniques, like drip irrigation, when the ranchers can demonstrate that they have the necessary water available. Irrigation systems can be permanent, underground systems or temporary, above ground piping systems. Both should be analyzed in this EIS.

11. Available organic mulches would be prohibited in the current DEIS. In appendix D, page 54, regarding row crops, NPS says: "Use straw mulch (2 tons per acre) in areas where crop residue or cover crops are not present in the spring or late fall and use certified weed-free straw if purchased from outside the park or from a different ranch." Other organic, weed-free mulches should be allowed. Weed free straw is not available from inside the planning area. Certified organic, weed free

straw is almost impossible to find. Available weed free straw is usually weed free because of herbicide use and therefore cannot be used on certified organic farms. Alternatively, excellent weed free, organic mulches, perfectly suited for this use, are locally available. Furthermore, on-farm composting activities are planned within the planning area, have been evaluated in this EIS and may be started soon on one or more ranches within the planning area. Because both compost and mulches are necessary for organic row crops, ranchers within the planning area should be allowed to produce compost and mulches, sell compost and mulches to other ranchers within the planning area and all ranchers in the planning area should be allowed to use both mulches and compost from sources within or outside the planning area.

12. On Page 37, NPS states: "Existing diversification activities on ranches would be authorized consistent with the guidance under alternative B." This statement is unclear. Does this mean that existing diversification activities can continue? Or does this mean that existing diversification activities, if inconsistent with the new rules in alternative B, would have to cease or be restricted? This EIS must make it clear that any irrigated row crop areas present in the planning area before this planning process began can remain. There has been no record of problems created by the existing row crops. Therefore, the irrigated row crop production should continue - just as was decided in the DEIS for the preexisting use of land producing silage. The DEIS is unclear on this point and should be clarified that the new restrictions apply only to new row crop areas.

Small scale, organic row crop production as practiced throughout the region has the potential to add economic value to the ranch/farm operations. While the NPS does properly describe some of reasons for the purpose of diversification - a way to help ranchers and farmers survive through changing economics, changing markets, changing climate, and other challenges - unfortunately, this DEIS has failed in its analyses. Although all the twelve points above were raised during scoping, the results and restrictions in this DEIS prohibit any meaningful production and the analyses need to be corrected. The diversification sections of the DEIS, including row crops, is incomplete and, therefore, misleads the public.

The analysis and outcome of the row crop analysis can be greatly improved. Early in the EIS process and during formal scoping, the NPS asked the ranchers to include the types and scale of the activities that they would like authorized through this process. In the DEIS, NPS failed to identify how many acres of row crops have thus far been requested by the ranchers. In our reading of the scoping comments, only some of the ranchers are interested in row crops. The largest request is for 30 acres. Less than 50 acres, overall, have been requested. This acreage represents only a small fraction of the 28,000-acre planning area and is only a very small percentage of the thousands of acres previously farmed for row crops in the planning area. It also represents fewer acres than the 75 acres authorized as the DEIS is written. In the DEIS, NPS is suggesting a 2-1/2-acre maximum on about 30 ranches or so, totaling a maximum of about 75 acres. Knowing that most ranchers will not elect to grow row crops, the DEIS must evaluate a total acreage for the planning area. If NPS has objective and supported reasons to allow a maximum of 75 acres or so in the planning area, an overall planning area limit could be set at 75. With a full analysis of all the impact topics as described above, perhaps more than the 75 acres could be authorized. This would allow the few interested ranchers to create a viable row crop component in their ranch plan while keeping within the total planning area authorized acreage.

Some ranchers have asked NPS for authorization to raise some small ruminant livestock, including goats and sheep. Scoping comments detailed the reasons that these livestock would be useful to the rancher and the natural resources of the planning area. Goals of the plan include keeping open vistas for the visiting public, preserving open coastal grasslands because of the assemblages of native plants and wildlife that depend on open grassland and preserving the cultural landscapes that include the working ranches and open grassland. Preserving grassland requires management. Without management, brush encroaches, and open grassland is lost. NPS agrees with the threat posed by brush encroachment described in the DEIS. Historically, ranchers used prescribed burning to help control brush and recently, mowing is the tool most widely used. Ranchers are now asking for the authority to use these small ruminants, known to be capable and efficient browsers, to help control the brush. The NPS analyzed this request and decided to allow up to 10% of the annual AUM usage to be used by these ruminants. The problem with the DEIS conclusions, as shown in Appendix D, page 15, under 3.2.12 Diversification, 3.12.1 and 3.12.2, is that NPS restricts sheep and goats to be limited only to the ranch core subzone and the pasture subzone. As described in this DEIS, pasture subzones are areas that are generally highly managed grassland where

planting, mowing, crop production, hay and silage production and other activities have been the historic use. There is generally less brush to manage in the pasture subzone and more tools available to control the brush. The range land subzone is where the more significant threat to grassland by brush encroachment exists. To support a sustainable, non-mechanical option to brush control, NPS should fully analyze where this livestock brush control can be most useful and modify the EIS so that these small ruminants can also browse within the range land subzone within the planning area.

## Tule Elk

Executive Summary, Page i, DEIS Page 5, Paragraph 1, NPS says:

"Two separate free-ranging tule elk herds occur within the planning area-Drakes Beach herd and the Limantour herd." Tule elk, the smallest subspecies of North American elk, live only in California. Tule elk were extirpated from Point Reyes by the 1860s.

Consistent with Congressional direction, 10 tule elk were successfully reintroduced to a 2,600-acre fenced wilderness reserve on Tomales Point in 1978. The 1998 Tule Elk Management Plan/Environmental Assessment established a free-ranging herd near Limantour Beach beginning with 28 animals in 1999 with an interim management limit of 250 to 350 elk and did not contemplate the expansion of tule elk into the ranchlands. At the end of 2018, the Drakes Beach herd consisted of an estimated 124 total animals and the Limantour herd consisted of an estimated 174 total animals (NPS, Press, pers. comm. 2019c)."

The 1998 Tule Elk Management Plan and Environmental Assessment did in fact consider what would happen if the tule elk were allowed onto the ranch lands. The EA evaluated the impacts to ranchers' private property, the impact to forages availability, the impacts of spreading Johne's disease to ranchers' livestock and the impacts to both elk and cattle from other communicable diseases that can be shared between the species. Furthermore, one of the alternatives rejected in the 1998 EA was to allow the elk to roam on the ranch lands. The 1998 EA and Elk Management Plan directed NPS to move a portion of the Tomales Point herd to a Designated Elk Range, clearly delineated with a map and fully within the Limantour wilderness. The document also includes language that the tule elk would not change any other permitted use. For example, the 1998 EA explained the area chosen for the Limantour herd would be "a large area in natural zones with buffers from major highways, ranches, and lands outside the Seashore." 1998 EA P. 46. The current, operative plan, created in 1998, clearly did contemplate elk impacts to ranch lands, consider the impacts, select an alternative to move the elk into only the wilderness area and put in specific management language to ensure that the elk would not affect the ranching permittees (a permitted use). Because of these safeguards to protect ranchers and the elk, ranchers and the general public supported the preferred alternative and plan.

NPS made it clear, in 2001, only 3 years after the 1998 EA and Elk Management Plan was completed, that NPS understood the plan and understood its responsibilities. In an NPS publication entitled "Point Reyes National Seashore, 2001, A Year in Review", the NPS stated:

"Since their release, the new herd has been carefully monitored to ensure animals remain inside seashore boundaries, do not interfere with cattle ranches within the park and are not shedding the organism that causes Johne's Disease." (document attached)

This statement was made at a time when the staff at PRNS knew the plan and were following the plan. Furthermore, around this time, the NPS staff shot and killed elk that came onto the PRNS ranch lands.

In violation of the 1998 Elk Plan, the NPS later allowed elk to enter the ranch lands, after which the very conflicts with livestock and ranching, and the negative impacts to elk, as evaluated in the 1998 plan, began to occur at Point Reyes. Since then, for over more than a decade, dozens of letters from seashore ranchers to PRNS and meetings with PRNS staff objecting to the management reversal have gone unanswered. The DEIS is incorrect and misleading to tell the public that the current plan did not contemplate the expansion of tule elk into the ranchlands. It is also misleading to entirely omit from this DEIS the Designated Elk Range that was agreed upon in 1998. The public reading this DEIS would have no idea about many important facts about the tule elk management. As this NEPA review is to update the 1998 plan, the 1998 plan should be fully presented to the

public. The NPS has distorted the no action alternative. As presented in this DEIS, the NPS is simply calling the recent condition the baseline, when the actual baseline, for 150 years, was no elk on ranch lands. If the tule elk were managed pursuant to the valid 1998 plan, the baseline would have been unchanged. It is unacceptable for this EIS to redefine the baseline by hiding the history and presenting the recent elk locations in a way that attempts to validate the newly changed condition. The harm caused to ranchers by elk and the new impact to elk by hazing and exposure to diseases are results of the NPS failure to manage the elk pursuant to its own 1998 Elk Plan. The 1998 plan gave assurances that other permitted uses were not to be altered by elk, and therefore, the baseline and no action alternative must be corrected.

The elk components of the preferred alternative in this DEIS are unworkable for several reasons. The ineffective provisions to separate elk from the ranches in the preferred alternative will lead to the loss of organic certifications as elk consume quality forage on the ranches. The elk herds will also continue to expand and limit ranching and available AUMs, essentially making the preferred alternative a reduced ranching alternative. The NPS needs to adopt a preferred alternative that will allow for sustained ranching in the historic ranch districts by removing the Drakes Beach herd, limiting the expansion of the Limantour herd to exclude ranchland in the Historic District, and using management tools to effectively separate elk from the ranches so that elk reside in the natural areas of the Seashore.

There is no map of the elk range that will be established under the preferred alternative. The Final EIS and Record of Decision should include a map (like the proposed elk range map on page 48 of the 1998 Elk Plan) of the area where the herd will be located in the preferred alternative. The DEIS includes Appendix Page A-2 showing the "Existing Range of Tule Elk in the Planning Area." However, there is no map of where elk will be permitted in the preferred alternative.

The area where elk will be allowed to range in the preferred alternative must exclude historic ranch land in the Point Reyes Peninsula Dairy Ranches Historic District and the Limantour herd should be limited to the Phillip Burton Wilderness.

The Final EIS and Record of Decision should set a limit on the size of the elk herd. If the decision only includes a map of where the elk range is located without including a herd size limit, the population can expand outside or within that area causing resource conflicts and damage. The public, the ranchers, and NPS should know what the established capacity size limit is for the number of elk.

The Final EIS and Record of Decision should include required and effective management actions to remove elk that go beyond clearly identified boundaries and to reduce the size of the elk herd if it exceeds the herd size limit.

1. As written, NPS would allow 120 elk to remain in the Drakes Beach herd which would cause significant problems.

a. The NPS suggests that hazing has been effective to keep elk off ranchers' pastures. It is not effective. NPS staff, during normal working hours, chase the elk, often in circles with no success at all. Other times, staff force elk to cross fences with damage to fences and to elk. Elk usually feed in the mornings and the evenings. When the NPS staff is not around, elk are consuming pasture and imported cattle feed paid for by the ranchers.

b. Forage enhancement and water development on the D Ranch does little to encourage the elk to stay off the ranch pastures. The elk continuously feed on ranchers' pastures.

c. NPS refers to the elk as "free ranging", yet in this DEIS, NPS would force the elk to stay on the C Ranch and portions of the B and D Ranches. Any elk leaving this defined area would be the first to be shot. This suggested plan more closely resembles a fenced-in herd in a small area (under 1500 acres or so) rather than a free-range herd.

d. This proposed plan would further domesticate what should be wildlife. Constant hazing, driving the elk through fencing, allowing elk to eat alfalfa hay out of ranchers' feed troughs, not allowing the elk to roam, etc. are not indicative of "wildlife". Scoping indicated these elk concerns would be addressed, yet this

DEIS does not evaluate the short term or long-term adverse effects of constant human interaction with the elk.  
e. The proposed plan as described in the DEIS would require constant, daily management into perpetuity. This would be very expensive and there would be no end to the expenditures.

f. The current 1998 plan was not followed by NPS and that is why there is a problem on the ranches today. If recent history is any guide and if elk are left within the ranch lands, damage to ranchers' livestock and property will only get worse.

Describing why this problem should never have happened and how this newly proposed plan will not work does not really solve the problem. During scoping, ranchers and other members of the public provided ideas to remedy the existing problem. Ranchers have never asked that the elk be lethally culled. Ranchers have only asked that NPS follow the existing plan to keep elk off the ranch lands, or ranchers will go out of business. How to keep the elk where they belong is the NPS responsibility, but ranchers can help by making suggestions. One of the most obvious and appropriate solutions proposed during scoping is a fence along the border of the wilderness area and the ranch lands. Before fully evaluating a fence, NPS decided to dismiss this idea. The NPS reasons for dismissal are precisely the effects that NPS should have considered in the DEIS rather than dismiss. The excuses given for dismissal of a fence are not justified as explained below:

### Topics NPS Dismissed from Analysis

#### 1. Fencing Elk into Specific Locations

a. The title "Fencing Elk into Specific Locations" is misleading. A fence along the border of the wilderness and the Ranch Lands as suggested would not be confining elk into a specific location. It would accomplish exactly what the 1998 plan expected to exclude elk from ranch lands and what NPS tried to enforce, at least until 2001. Two-thirds of PRNS equal tens of thousands of acres of open space and wilderness where the elk are supposed to be and where the Designated Elk Range is located. The "Fencing Elk into Specific Locations" title could lead the public into believing there is an attempt to confine the elk into a small range, like Tamales Point. It clearly is not. The fence would simply keep the elk off the ranch lands so that the historic family farms could continue operating.

b. High cost of construction and maintenance. The proposed fence is only about 4 miles long. During scoping, ranchers analyzed the cost and the cost seemed reasonable. If constructed properly and with the proper materials, the maintenance would be low. This NEPA process should analyze the cost of the fence and maintenance to compare and contrast it with the cost of ongoing hazing, repairing existing ranch fences damaged by elk, shooting elk to maintain

populations and all the other controls necessary to keep the elk on the ranch land

- significant daily costs to the public that would be necessary into perpetuity.

c. Ineffectiveness and impacts on other wildlife. Fencing design should be considered and evaluated before simply dismissing the idea of a fence. Certainly, there are fences that can be effective for elk. They exist elsewhere. Why make an automatic assumption that an elk fence will have impacts on other wildlife? Elk are the largest animal to keep on one side. Why can't a fence be designed to allow smaller wildlife to pass through? Fencing and wildlife experts should be invited to participate in the analysis to design a fence that is effective in preventing elk passage and reduces impacts or barrier to smaller wildlife.

d. Visitor experience and wilderness values. Firstly, the location of the fence proposed by the ranchers, along the border of the wilderness area, is mostly out of sight to the visiting public. It is largely surrounded by brush and therefore largely out of view. Visitors would still be able to view elk at PRNS regardless of whether there is a fence or not. A livestock fence already exists on the border of the ranch land and the wilderness area. A slightly taller fence would seem to have little impact on the visiting public or wilderness values.

e. Based on the terrain, the fencing would be costly. A livestock fence already exists in the location of much of this fence, and it is accessible. The areas where new fencing is necessary was described as the most accessible location for the fence. This EIS should not have simply dismissed building a fence to separate elk from ranch land because of difficult terrain. The existing Tamales Point elk fence occupies much more difficult terrain and the NPS put that fence there. This EIS should include a thorough analysis of our comments of why a fence is feasible and we support a fence at the wilderness boundary as part of the preferred alternative.

f. The fence would not be a full enclosure fence. This observation is correct, and a complete analysis was not made

in the DEIS to determine if this would be a problem or a benefit. The fence would go from the water of Limantour Estero (like the Tamales Point elk fence that terminates at the water) and end in the wooded area on the Inverness Ridge, an area not currently visited at all by the elk (map attached). An ending location on the ridge could be chosen to discourage elk from going around the end of the fence. This could be dense vegetation, a significant drop off, etc. This needs to be fully analyzed. It should be noted that none of the Inverness Ridge is currently fenced and the elk do not pass this natural barrier. Limiting the fence distance by stopping at the ridge would accomplish the objective of protecting the elk from NPS hazing and other harassment on the ranch lands and would allow elk to free range in a natural setting without a full enclosure fence. If there is a concern that the elk could change their typical movement patterns and begin to move up to the ridge and potentially go around the end of the fence, monitoring this location to prevent this unlikely event would cost only a fraction of what is being spent to daily monitor, haze and kill excess elk on ranch lands and would be far less disruptive to the elk.

During scoping the public also suggested that the NPS evaluate complete removal of elk from the ranch lands, and to manage elk as directed in the 1998 Elk EA and Management Plan.

Instead of evaluating an obvious solution to the ongoing problems caused by the recent introduction and expansion of tule elk on ranch lands, the NPS dismissed the suggestion and did not analyze the benefits of removal. Many of the benefits of removing the elk from the ranch lands are described above. The reasons NPS used to dismiss removal of elk have little merit as described below..

1. NPS states "Based on preliminary forage model results, the roughly 50 elk that move onto ranch lands from the Limantour herd do not affect the forage availability or RDM for ranches in that area." Simply put, the only way NPS could be accurate with this statement is if elk did not consume any forage at all. The fact is that elk eat the same forages that cattle consume and therefore absolutely do affect forage availability and RDM- no matter what the NPS' theoretical model tells NPS. When elk eat the forage on the ranch lands, ranchers, in order to meet their RDM requirements, must either reduce cattle stocking rates or import more feed for the cattle. Both solutions are direct costs to ranchers, and, in at least two cases in the planning area, are already threatening the economic survival of the ranchers. If no effective separation of elk from ranch land is included in the preferred alternative, then the alternative will be simply another reduced ranching alternative.

2. NPS suggests that if elk were now relocated to the designated elk range as planned in 1998 and into the wilderness, a fire in the wilderness could lead to an inadvertent elimination of all tule elk at Point Reyes. Refusing to evaluate elk relocation due to this unlikely catastrophic fire is wrong. The concern of fire killing all the elk at Point Reyes was not even raised as a potential impact during the 1998 Elk EA and is now being used as an excuse to not seriously consider a reasonable alternative to have elk free range in the wilderness. NPS considers wilderness area forage availability in this EIS to dismiss relocation back to the Designated Elk Range. Therefore, all elements of possible use of the wilderness in the planning area for elk management should be considered as within the scope of the EIS. This EIS should study the need for vegetation management in the Limantour wilderness area, as well as an emergency elk evacuation plan, and if necessary, the possibility of creating an emergency plan to temporarily allow the tule elk to enter the ranch lands, or elsewhere, in the event of a catastrophic fire and complete loss of forage in the Designated Elk Range. The analysis should fully evaluate the reduced fire danger and fire impacts to local communities in the wildland-urban interface as well as the improved elk habitat in the wilderness area that would result from proper vegetation management.

3. The last reason (page 63) NPS gives to refuse the evaluation of relocation of the Drakes Bay herd is that the Tomales Point elk fences have occasionally failed. The result has been a few members of the Tamales Point herd entering the adjoining ranch lands.

Historically the NPS has repaired the fence and put the wayward elk back in the Tomales Point elk range. Because of a possible broken fence at Tamales Point (10 miles away from the Drakes Beach herd), NPS claims that it can't accomplish keeping the elk completely out of the ranch lands and therefore refuses to evaluate relocation of the Drakes Bay herd. Good fencing design with an appropriate monitoring and maintenance plan should be evaluated in this EIS, not dismissed. As fully evaluated in the 1998 Elk EA, relocation of elk to the Designated Elk Range is possible.

Here, all the reasons supporting tule elk relocation, a central tool in the current, operative elk management plan, are important topics to consider before NPS changes the existing NEPA compliant 1998 Elk Management Plan and excludes elk relocation as an option without analysis in this DEIS. NEPA compliant land management plans do not expire. As revisions are needed, these documents can be updated. This EIS is designed to amend the current Elk Management Plan. If the NPS refuses to analyze elk relocation in this revision, the fully analyzed,



NEPA compliant elk relocation directives would remain in the plan and could not be ignored. The NPS, in this section, simply identified potential problems or impacts that may result by building a fence and used only these potential problems to dismiss the possible solution. Notably, NPS did not mention any potential benefits to elk, ranchers or NPS staff by having a fence along the wilderness ranch land boundary. This EIS must perform a robust analysis of a fence as requested during the scoping process.

The DEIS falls short of proper analysis of tule elk in an additional way. The NPS identifies management techniques to apply to the Drakes Beach herd. Furthermore, NPS says it will manage so that another new herd will not form within the ranch lands. Missing in the DEIS is any analysis or plan to control the movement of the Limantour herd onto the ranch lands. The DEIS would direct the NPS to only "monitor" the Limantour herd. The migration of this herd out of the designated elk range and on to ranch lands is already causing significant harm to ranchers. These impacts have increased over the last few years and are well-documented. The DEIS has not fully analyzed these impacts or considered the almost certain increase in elk migration onto ranch lands into the future. Because this would simply be an expansion of the Limantour herd that is already causing problems, and not the establishment of a new herd, the NPS would have no direction or responsibility to control further proliferation. This omission would almost certainly result in more devastating consequences to both elk and ranchers. This EIS must analyze the impacts of all the elk on the ranch lands and direct management responsibilities for NPS to control population and reduce elk impacts of all elk in the entire planning area, not just the Drakes Beach herd.

The failures in the elk management section of the DEIS would likely result in a reduction of ranching in the planning area. This makes the preferred alternative-to keep all currently permitted ranch families in business-- unachievable.

A properly planned fence along the ranch land wilderness boundary would solve many problems. It would:

1. Reduce the elk impacts to currently authorized ranching activities. These adverse impacts are significant enough that at least one dairy rancher (due to the Drakes Beach elk herd) and one beef rancher (due to the Limantour elk herd) will go out of business if the DEIS does not include a comprehensive analysis of all elk in the planning area and adopt explicit limits on the number of elk, their location, an effective measures to separate elk from ranch lands. With the ineffective approach suggested in the DEIS, more ranches may also be forced out of business.
2. Reduce taxpayer spending by a one-time investment in a fence. Continuous monitoring, hazing, fence repairs, population controls and other activities on ranch land will cease.
3. Reduce human disturbance to the wildlife. It would be more natural for the elk to go undisturbed in a natural habitat in the Phillip Burton Wilderness versus facing constant harassment, hazing through livestock fences, and foraging on cattle pastures and imported feed intended for cattle.
4. Allow elk to free-range in a much larger, natural habitat. As written, the DEIS suggests major NPS intervention to contain the Drakes Beach herd in one small area.
5. Recognize that the California Department of Fish and Wildlife has determined that the Drakes Beach and Limantour herds are one herd, regarding genetics and diseases. A one time relocation following fence construction would not create any new genetic or health risks to the elk herds. Understanding the need to separate elk from cattle, as fully evaluated in the 1998 Elk EA, NPS has recently experimented with relocation between all three herds at PRNS and has found, without a fence, relocation will not solve the problem because the elk may return.
6. Eliminate the need for continuous lethal control of elk on ranch lands as described in the DEIS.
7. Simplify NPS elk management responsibilities. NPS is already responsible to manage the elk in Limantour wilderness. In this EIS, NPS has chosen to only consider elk management changes to the 1998 elk management plan within the planning area. After fencing and relocation, the NPS and the public can decide if any changes from the current policies are necessary to manage the forage resources and tule elk population within the designated elk range.
8. Allow ranches to operate as they have since the 1850's - with no elk on the ranch lands.
9. Eliminate conflicts that have arisen because of the recent lack of elk management.
10. Allow the visiting public to view this wildlife species in a natural setting, not comingled with cattle and not being chased by NPS staff.
11. Preserve elk viewing by people with disabilities because elk viewing from an automobile will still be available at

the Tamales Point elk range.

12. Disallow this EIS process to validate what is either a lack of management, or worse, an unwritten and unapproved plan to allow elk to colonize the ranching area. A well designed, wildlife friendly fence would demonstrate the NPS' commitment to the National Historic Register's Historic Dairy District designation while preserving the PRNS Tule Elk herd.

The DEIS is confusing and unclear on the topic of the 1998 Elk Management Plan and EA and how it relates to this NEPA process. Much of the discussion of elk in this document suggests that this EIS is meant to update the current, operative elk management plan published in 1998. Yet the DEIS contains no maps or other information describing the Designated Elk Range as determined and described in that plan. No reference is made to the current Designated Elk Range anywhere in the document-yet the public approval, and NPS agreement, for the elk relocation in 1998 was based on that plan. In the plan, the elk were to be relocated to the Designated Elk Range fully within the Limantour wilderness. (Map attached)

In other parts of the DEIS, NPS states that the 1998 Elk Management Plan will remain in force. On page 41, it states that under Alternative B the elk at Tomales Point would "continue to be managed as a fenced population in accordance with the 1998 Tule Elk Management Plan/EA." At the bottom of page 41, NPS states that "No population-level management that would threaten the future existence or viability of the Limantour herd, consistent with the goals of the 1998 Elk Management Plan/EA ...".

Since NPS frequently gives historic context, these critical facts need to be corrected where necessary and important missing pieces should be added. If not, the public will have a skewed historic reference and that incorrect context may lead commenters to erroneous conclusions. The one mention of elk depredations in the DEIS is entirely inaccurate (page 82): "Elk have occasionally been seen eating from the hay racks on C Ranch, but this is a rare occurrence." There is no evidence presented for this statement. The C Ranch dairy farmers have evidence to the contrary. The elk depredations there are far worse than described in the DEIS.

On page 5, NPS mentions that "The California Department of Fish and Wildlife (CDFW) manages all other tule elk herds in the state." It does not mention that the 1998 Elk Management Plan/EA contains a Memorandum of Agreement (MoA) between NPS and CDFW (then CDFG). In that MoA, the two agencies agreed to a Statement of Work under which they would together, among other things, develop a long-term management plan for Tule Elk in Point Reyes. Was such a plan ever developed? What is the status of the working relationship with CDFW? These were questions asked during scoping that have not been answered or evaluated in the DEIS.

Soils

Exec Summary, page vi

In this section, NPS states: "Soils Under alternatives A, B, C, and D, activities associated with beef and dairy ranching would continue to affect soils because of erosion, compaction, and alteration of soil fertility, primarily from livestock grazing, forage production, high intensity use areas, and manure spreading. Under alternatives B, C, D, and E, impacts on soils would be reduced compared to existing conditions by establishing management activity standards and mitigation measures, and implementing a zoning framework that would ensure more intense land uses occur in areas without sensitive resources, such as soils with high erosion potential, throughout the planning area. Under alternative E, noticeable beneficial impacts would occur compared to existing conditions from the conversion of the six dairy ranches to beef operations, elimination of manure management practices, seeding, forage production, and diversification activities. Under alternative F, cessation of ranching would eliminate all impacts on soils associated with ranching activities. Impacts from public use and enjoyment and elk management under all the alternatives would be minimal in intensity and limited in scale."

Only negative impacts to soil resulting from ongoing agriculture are discussed.

Scoping clearly and repeatedly requested that NPS fully evaluate the positive impacts to soils resulting from carbon farming (by creating and following carbon farm plans). This entire document does not evaluate carbon farming or the ecological benefits of preparing a carbon farm plan and implementing that plan. Ranchers,

government agencies and the general public asked that carbon farming be fully evaluated. Although the science related to carbon farming is international, readily available and fully describes benefits to soil, no attempt to include carbon farming as a management tool is included in the DEIS. Furthermore, carbon farming was not listed in the DEIS section entitled Alternatives Considered but Dismissed from Further Analysis. Remarkably, this section describes why NPS dismissed the raising of ducks on the ranches which had little, if any public scoping focus, yet it remains silent about carbon farming, which had significant scoping requests and the potential for significant positive impacts resulting from carbon farming. Some, but not all individual practices, that would likely be included in a carbon farm plan are found only in the appendices of this DEIS and not in the context of a carbon farm plan. As a matter of fact, one of the most beneficial carbon farm practices - compost application on grassland- is prohibited for most of the planning area. Because this DEIS failed to analyze complete carbon farm impacts, and did not include any reason for dismissal, the average reader of the DEIS would be unaware of the benefits and uninformed that the carbon farm planning and implementation was ignored in the DEIS. NPS must invite the Marin Carbon Project, Carbon Cycle Institute and Marin Resource Conservation District experts to describe the benefits of combining practices into a plan that would improve soils, increase soil carbon and increase organic matter to more closely resemble historic soil conditions. Improvements to water quality and air quality also result from carbon farming.

This DEIS emphasizes only the negative effects of livestock on soil and other natural resources and ignores the many potential benefits, including carbon farming. Notably, DEIS makes these claims of harm caused by cattle, but is silent about any potential harm caused by another large ungulate - the tule elk. This pattern of over-emphasizing the impact of livestock and ignoring the impact of elk is found throughout the DEIS. Every purported impact from livestock- on plants, animals, soil, water, and air- should also be assessed for the tule elk. The absence of that information from the DEIS invalidates its usefulness as a planning document.

## Socioeconomics

### Executive Summary page ix

The DEIS does not explain the fact that the historic ranches within the planning area represent nearly 20% of the agricultural land in Marin County and the ranching families and their employees within the planning area produce nearly 20% of the agricultural product value in Marin County. Instead, the DEIS includes all of Sonoma County's production value added to Marin County's production to compare to the value of the production and employment in the planning area. Sonoma County is a large agricultural county which includes a huge, high value wine industry product. This unusual combining of Sonoma County's high production value with Marin County's production misleads the public by presenting the planning area's production and employment as infinitesimal. This misleading comparison must be corrected in the final EIS.

## Air Quality

On page ix of the Executive Summary, NPS concludes in this DEIS that "beef cattle [not dairy cattle] are the primary contributors of fugitive dust and particulate matter PM<sub>2.5</sub> emission rates." The Air Quality section of the DEIS, beginning on page 93, does not support this conclusion.

The NPS conclusion that beef cattle are the primary contributors of dust is unsupported by data or on the ground reality. In the planning area, beef cattle spend almost all their time grazing and resting on pastures and rangeland. Beef cattle are occasionally gathered for processing - often months pass between beef cattle gatherings. Alternatively, as described in sections of this DEIS, dairy cattle are gathered twice a day for milking, plus the regular gathering of heifers and dry cows for processing. Furthermore, cattle density is very different between dairy and beef operations. In the planning area, NPS authorizes dairies to stock at an average of 1.7 acres per cow while beef ranches are authorized at an average of 8.8 acres per cow - a 5-fold difference in livestock density. The fact that NPS concludes that beef cattle are the primary source of dust demonstrates that the Air Quality section in the DEIS requires analysis and correction.

Another "conclusion" found in the air quality section of this DEIS is that ranching/livestock GHG emissions,

including dust, represents 87% of the total planning area emissions while the mobile source emissions from the several million seashore visitors and the NPS staff and equipment represent only 13%. Ignored from this analysis are the emissions from mobile sources on the drive from the visitor's starting point up to the planning area and the return trip. Excluding the emissions from visitors traveling to and from the planning area grossly underestimates the GHG emissions generated from seashore visitors' automobiles.

While NPS uses multiple pages to fully describe the negative impacts to air quality caused by agriculture and livestock, the DEIS completely fails to describe the positive effects that grazing has on air quality if carbon farming is allowed. Compost application, one of the most important carbon farming practices - a practice that is included in most farm plans because of outstanding results - - would be specifically prohibited if the current DEIS goes unchanged. (NPS did, however, include in the appendices, some of the practices that could be included in a carbon farm plan. These BMPs were only included to mitigate for other impacts-not for use in the context of a carbon farm plan.) Specifically, commercially produced compost certified for use in organic food production, must be properly evaluated by this EIS, and approved for use in the planning area. These errors and omissions have created a draft that is misleading. Public scoping from ranchers, individuals, industry groups, agencies and non-profits asked NPS to fully evaluate carbon farming in this EIS. Furthermore, ranchers within the seashore have applied for and have been selected to receive grants for the creation of carbon farm plans prepared by the Marin County Resource Conservation District (RCD). Near the beginning of this EIS process, the RCD asked the PRNS Superintendent (because landowner approval is required) if RCD and the ranchers could move forward with the carbon farm plans. The Superintendent refused to allow the carbon farm planning process to move ahead because NPS did not understand the science.

The EIS process is where NPS should have become educated about this issue. Carbon farming has significant positive impacts to analyze. Available science from around the world recognizes and quantifies the soil and air quality benefits that result from carbon farm plan implementation. Given the record of repeated attempts through scoping to have NPS evaluate carbon farming, refusing to do so is a violation of NEPA.

The Air Quality, Water Quality and Soil Quality sections must be revised to fully evaluate and report on the positive impacts of carbon farming as was requested during the public scoping period in this process. These sections, as written, are incomplete, inaccurate, mislead the public and illustrate a lack of experience and understanding by the current EIS team. The NPS must involve outside experts from The Marin Carbon Project, The Carbon Cycle Institute, the Marin Resource Conservation District, and the Marin Agricultural Land Trust with the training, skills and experience necessary to conduct a robust carbon farm plan analysis. This analysis will provide useful information as to the effects carbon farming will have on Air Quality, Soil Quality and Water Quality in the planning area. By conducting an honest, robust evaluation that fully responds to public scoping, NPS decisions and activities authorized using complete analyses as support are less likely to be challenged and the challengers are less likely to prevail.

### Manure and Nutrient Management

On page 39, NPS states: "Under alternative B, application of commercially produced compost and fertilizer would not be authorized." These two inputs should be evaluated separately. It is reasonable to prohibit commercial fertilizers in the planning area. Petroleum based, commercial fertilizer is known to produce greenhouse gases both in its production and in its use.

Commercial fertilizer has also been shown to contaminate storm water runoff. These commercial fertilizers are not allowed for use on certified organic farms. Commercial compost is completely different, however, and should be allowed. The composting process, including commercial composting, controls the decomposition of organic materials thereby reducing GHG production. The use of compost adds vital microbes to improve soil health. It would be reasonable for NPS to require that all compost used in the planning area meets the national organic rule for use in organic food production. By requiring this certification, composts entering the planning area, or produced in the planning area, would be pathogen free and weed free.

The fact that NPS combined commercial fertilizer and compost in its analysis and prohibited both shows a lack of understanding of soils, soil inputs, and the benefits of best management practices for soil health. Commercial fertilizer is a "fertilizer", compost is an "organic soil amendment" - - not a fertilizer. Furthermore, disallowing the

use of compost on pastures within the planning area would have additional consequences, including the blocking of positive impacts on Air Quality, Water Quality and Soil Quality. NPS did not address analysis of important nutrient management facts, issues and solutions in this EIS. The EIS team must include outside expertise to fully evaluate existing conditions and best practices for nutrient management. NPS must also include experts from the Natural Resource Conservation Service, the Marin Resource Conservation District and the University of California Cooperative Extension Service to analyze existing conditions and to recommend best nutrient management practices for soil health. These agencies have extensive training and decades of experience working with ranchers and the regulatory agencies in the planning area and elsewhere. Due to these significant omissions, the faulty conclusions could be challenged. Rewriting the Nutrient Management section with qualified consultants would result in different, defensible recommendations.

On page 6 of Appendix D, NPS states: "On dairies, nutrient management may also be included as a soil amendment for forage production."

In the DEIS, NPS is only allowing nutrient management on dairies and prohibiting nutrient management on beef ranches. Nutrient management should not be limited to dairies. Soil sampling in the project area, as well as on other Marin ranches outside the project area, indicates that soils on operating dairies have more carbon and more organic matter than beef ranches.

This reality, and why it is so, is not even mentioned in the DEIS analysis. Currently, NPS allows dairies to have four or five times more cows per unit area than it allows beef ranches. Furthermore, because of the high nutritional demand by lactating dairy cattle, more feed is consumed per head on a dairy ranch than on a beef ranch. Dairy cows are also fed concentrated feeds, high in nutrients, where beef cattle are not. The net result is an increase in added nutrients to soils on dairy farms. Dairies generally spread the nutrients by manure application and beef ranches do not. Beef ranch soils need added fertility more than dairy soils. Furthermore, compost application on soils with lower levels of organic matter can lead to increased carbon sequestration. Some of the project area beef ranchers interested in carbon farming (using a suite of practices known to help sequester carbon) have already been selected to receive grant-funded carbon farm plans. Properly planned application rates will be determined prior to application. These rates will consider agronomic needs of the pasture and forage areas. Soil samples, plant communities, as well as other NPS natural and cultural resource goals will be considered in the carbon farm plans.

Ranchers in Marin County that have been carbon farming for several years have noticed an increase in native plant species. This may be due to the general understanding that most Marin County soils had higher organic matter and soil carbon 100 years ago when deeper rooted perennial grasses dominated. Alternative B only allows soil fertility improvements within the pasture subzone areas that have historically been highly managed by ranchers (including mowing, fertility improvement, planting, row crops and hay production) where non-native, European grasses dominate. Highly managed pastures exist on both dairy and beef ranches. Both dairy and beef ranchers should be allowed to use organic compost. Because of the myriad benefits of carbon farming, this EIS must also consider allowing carbon farming, including compost application, within the range land subzone.

Most of the planning area is located within two Historic Dairy Districts. Most of the beef ranches were once dairies. Historically, soil fertility was treated similarly on all ranches. It would be inconsistent to allow added fertility on only dairy pastures, where soil organic matter is the highest, and to prohibit added fertility on beef ranches.

A complete, robust analysis of nutrient management in the EIS by including outside experts is necessary.

#### Composting

On page 19 of Appendix D, NPS states:

"A composting facility is a structure to contain and facilitate controlled aerobic decomposition of manure or other organic materials into biologically stable organic

matter that is suitable for beneficial reuse. It is designed to produce a soil amendment that adds organic matter and beneficial organisms to the soil, provides slow-release plant available nutrients, reduces greenhouse gas emissions from waste material decomposition, and improves soil condition. Composting can be used to reduce water pollution potential and improve handling characteristics of organic waste materials, to repurpose organic waste into animal bedding, and to suppress potential plant and animal pathogens."

Here, NPS recognizes the benefits of composting and compost use within the planning area. NPS must not limit the use of compost to dairies only. NPS must also allow compost production and compost use on beef ranches. NPS must allow commercially produced compost for use within the planning area. NPS could require that all compost used the planning area meets the National Organic Rule for use in organic food production. The National Organic Rule requires a specific compost process that kills pathogens and weed seeds and the facilities that produce these products are regularly inspected to ensure compliance with National Organic Program.

[Attached: 2001 Annual Report: Native Tule Elk Range Freely at Point Reyes- an Update; Map of Tomales Point Elk Range and Proposed Elk Range for Relocation Population; Map of Point Reyes National Seashore (Wilderness v Ranchlands).]

#7567

Name: Heneman, Burr

Correspondence: Dear Superintendent Muldoon,

Thank you for the opportunity to provide my comments on the August 2019 General Management Plan Amendment Draft Environmental Impact Statement (GMPA DEIS) for Point Reyes National Seashore (PRNS) and the north district of Golden Gate National Recreation Area (GGNRA).

I am commenting as someone who has been a neighbor of the Seashore for almost 50 years, who has closely followed Seashore planning and management issues for the entire time, and who was a member of the Citizens Advisory Commission for GGNRA and the Seashore in the 1970s and 1980s. In addition, I am a co-founder of Commonweal (1976) and have had a long association with that lessee within PRNS. And, in the 19890s, I was executive director of the Point Reyes Bird Observatory (now Point Blue), an NPS cooperating organization that has a field station at Palomarin in PRNS.

General Comments First of all, I want to compliment you and your staff for producing an excellent document on a challenging subject. Both ranching and national parks are complex, and the combination of the two here at PRNS and GGNRA is unique in the National Park Service system. Your task has been to break trail through new territory, and you have done an admirable job.

I strongly support the continuation of beef and dairy ranches in the planning area. I favor those operations continuing at their current scope and scale, reduced by the resource protection buffers, and enhanced by possible diversification activities. As a consequence, I support Alternative B, the Preferred Alternative, in the GMPA DEIS.

Continued ranching is consistent with all of these: •The history of the area going back to at least the 1850s; •The Seashore's enabling legislation, especially the 1978 amendments giving the Secretary authority to continue to lease "agricultural land" for "agricultural, ranching, or dairying purposes," thus maintaining the working landscape, worked primarily by families who have persisted here for multiple generations; •Maintaining the Seashore's scenic, natural, and historic resources and values without "impairment or unacceptable impacts" (as discussed in NPS Management Policies 2006, 1.4.3.1- 1.4.7.1); •National Park Service practice in the management of the planning area since the creation of PRNS; •The 2012 directive from then Secretary of the Interior Ken Salazar to

offer up to 20-year leases to ranchers in the planning area. Specific Comments A.Scenic resources and values - Chapter 3, Affected Environment

The DEIS is inadequate in its consideration of the scenic 'resources and values' of the affected environment (NSF Management Policies 2006, 1.4.6). And the DEIS is inadequate in describing the inter-relationships between ranching and the Seashore's scenic resources and values.

The only relevant mention of scenic resources and values in the DEIS is the following language in the Visitor Use, Experience, and Access section of Chapter 3: Visitor facilities and recreational opportunities in the planning area include scenic driving, hiking and biking trails, equestrian use, and the Kenneth C. Patrick Visitor Center. Many visitors to the park travel through the planning area to reach other park destinations, such as Drakes Beach, Tamales Point, and the Point Reyes lighthouse. While the roads used for traveling to these park destinations fall outside the planning area, visitors still enjoy the scenic quality of the planning area landscape while traveling along them. (DEIS, page 83)

That is not an adequate description of the scenic resources and values of the affected environment in the Point Reyes National Seashore. As I urged in my scoping comments (29 November 2018), the DEIS should explicitly and adequately include scenic resources and values for at least these reasons: •The NPS is mandated to prevent "impairment" of, or even the lesser standard of "unacceptable impacts" to, any of the Seashore's resources and values (NSF Management Policies 2006, 1.4.4 and 1.4.7.1). •Scenic resources and values are explicitly listed - and listed first - - by Congress in the NPS Organic Act of 1916. (16 USC 1) •The NPS Management Policies 2006 lists "scenery" first among resources and values subject to the no-impairment standard (NSF Management Policies 2006, 1.4.6). •While the language of the Seashore's enabling legislation does not use the words 'scenic' or 'scenery', they arguably are strongly implied:"... in order to save and preserve, for purposes of public recreation, benefit, and inspiration, a portion of the diminishing seashore of the United States that remains undeveloped ... " (16 United States Code [U.S.C.] § 459c et. seq.) The GGNRA enabling legislation is explicit: the purpose is to " ... "preserve the recreation area, as far as possible, in its natural setting, and protect it from development and uses which would destroy the scenic beauty and natural character of the area" (16 U.S.C. § 460bb et. seq.). •The Seashore's planning area has important scenic resources and values that are equal to the natural and cultural/historic resources and values and are subject to the same no-impairment and no unacceptable impacts standards. The planning area is a major part of the Seashore's mosaic of pastures, rangeland, wooded and wetland areas, water features, topographic variation, and historic structures. The expanses of coastal grassland and prairie with little or no shrub vegetation on the ranches are important elements in the Seashore's scenic resources and values.

Chapter 3 has subsections for vegetation; wildlife; and cultural landscapes, historic districts, and historic structures. The Seashore's outstanding scenic resources and values deserve their own subsection in the final GMPA and EIS.

#### B. Scenic resources and values - Chapter 4, Environmental Consequences

In its discussion of the alternatives that allow ranching to continue, the DEIS is inadequate in its description of the role intensive pasture management, including grazing by cattle, in maintaining the scenic resources and values of the planning area. To remedy that deficiency, the final GMPA and EIS should include a description and discussion of the interrelationships between the Seashore's scenic resources and values and pasture and range management as practiced on the ranches. Specifically, it should describe the extent to which the visual characteristics of the planning area depend on active management, especially grazing and weed mowing.

In its discussion of the alternatives that reduce or eliminate beef and dairy operations, the DEIS is inadequate in its description of the impact on scenic resources and values in the planning area unless the Seashore undertakes significant mitigating management actions.

The point is not whether the grasslands and rangelands that are now relatively free of brush and shrub vegetation are good or bad, or that, in alternatives D, E, and F, the coastal scrub that would replace much of the open

grasslands (without intensive management) is good or bad. The points for Chapter 4 are that, under alternatives D, E, and F: •Without major mitigation efforts, much or most of the grasslands and prairie would quickly transition to coastal scrub and invasive species such as poison hemlock, fennel, thistles, and broom in the absence of intensive management as is practiced on the ranches. •Absent significant mitigation, the vegetation changes would have a significant impact on the Seashore's scenic resources and values that needs to be disclosed and discussed. That point is supported by the vegetation changes that have occurred in the Seashore and GGNRA where intensive management, such as grazing by cattle and mowing, has ceased. (I provide illustrations of relevant past vegetation changes below.)

Scenic resources and values should be treated explicitly in their own subsection of Chapter 4, Environmental Consequences. The emphasis in the legal mandates and the importance of the scenic resources and values of the planning area justify an additional section on 'Scenic Resources' just as there are sections for vegetation; wildlife; and cultural landscapes, historic districts, and historic structures.

For alternatives D, E, and F, the final GMPA and EIS should include the following: •A description of the reasonably expected changes in major vegetation types in the absence of intensive management. That description should include at least a rough estimate of the scale of the changes: how many acres, on which ranches; •A discussion of whether the anticipated changes, absent intensive management, would constitute impairment of, or unacceptable impacts to, the Seashore's scenic resources and values (see NPS Management Policies 2006, 1.4.4 and 1.4.7.1); •If the NPS proposes mitigating management measures to conserve scenic (and natural and cultural) resources and values, the final GMPA and EIS should provide significantly more detail than is in the DEIS.

Action alternatives must be "technically and economically feasible" (DEIS, page 9). If the changes to scenic resources and values would constitute impairment or unacceptable impacts, there needs to be an adequate presentation of mitigation measures that includes evidence that they are "technically and economically feasible". In regard to management measures to maintain the character of the scenic resources and values, the brief mentions of possible mitigation in the DEIS are inadequate. For example, it is not adequate to only say for alternative F that: "NPS may use prescribed grazing on lands in the planning area to meet resource management goals and objectives (e.g., maintenance of disturbance regimes in grasslands which contribute to the historic character of the two National Register historic districts). Prescribed grazing would be conducted by contract through NPS. The scale of these operations is anticipated to be on the order of 100 to 200 AU or less in the planning area and limited to spring through fall, to avoid the wet season. NPS would identify priority areas for vegetation management." (p. 48).

Open grasslands are major scenic features of A, B, C, D, E, H, I, J, L, M, N, and Home ranches. For alternatives D, E, and F, the DEIS should address, with adequate detail, questions such as: •What management measures would maintain the scenic resources and values of the planning area where ranching is discontinued? •How much open grassland could 100-200 AU maintain during "spring through fall"? (Conversations we have had with ranchers, both inside and outside the Seashore, indicate that many more AU would be needed to maintain the visual character of the Seashore.) •At what point does the amount of prescribed grazing needed to maintain the scenic values of the planning area violate the no-ranching intent of the settlement and Alternative F? •The Seashore has very limited experience with prescribed grazing . Would such a regime with much greater geographic scope than has been used to date by the Seashore be "technically and economically feasible" for ranchers in this area? Such a regime would require a rancher or ranchers with sufficient animals to graze large areas in spring and fall and then have another location outside the Seashore to move those animals to. My conversations with ranchers in the area suggest the proposed management measures would not meet the "technically and economically feasible" standard. •Will prescriptive grazing alone prevent a transition to coastal scrub? •Is it technically or economically feasible for the NPS to supplement prescribed grazing with brush and weed mowing over a large enough area to maintain the scenic character of the planning area? •Is fire potentially available as a management tool for managing brush and weed species? •Could tule elk eventually maintain or restore the scenic character of the Seashore's grasslands and pastures? (It appears not from what has occurred at Pierce Point and in the Limantour area, without mowing or, as Native Americans on Point Reyes are believed to have done, using fire as a management tool.)



The following two photos are examples of the rapid transition of ranchlands to coastal scrub and invasive weed species.

1. Line fence between H Ranch (Evans) and portion of L Ranch that has been ungrazed for about 40 years. The L Ranch side has been solid brush for much of that time. 2. The coastal scrub area between the upper portion of Abbotts Lagoon and the grassy area (H Ranch, Evans) was used for silage as recently as 1983. The transition to coastal scrub was rapid, here, too. (The Abbotts Lagoon Trail, near the fence line, is obscured by the new coastal scrub.)

3. Another example is in the southern end of the Olema Valley where the NPS has been using prescribed burns to try to manage the heavy Scotch broom invasion that followed the end of grazing in the 1970s.

### C. Cultural landscapes, historic districts, and historic structures

The DEIS is inadequate in its treatment of the historic/ cultural resources and values in the planning area. Specifically, the DEIS considers the historic resources and values to consist only of the physical elements, such as historic structures. The DEIS ignores the reality that the 'working' nature of this 'working landscape' is an important part of the cultural resource.

1. Park resources and values subject to the no-impairment standard include cultural resources and values -- including cultural landscapes: The "park resources and values" that are subject to the no-impairment standard include: "the park's scenery, natural and historic objects, and wildlife, and the processes and conditions that sustain them, including, to the extent present in the park: cultural landscapes ... [NPS Management Policies 2006 1.4.6]

2. Cultural Landscape - A cultural landscape is a geographic area that is associated with an historic event or person or activity, and ranching is such an historic activity: "Cultural landscape- a geographic area, including both cultural and natural resources and the wildlife or domestic animals therein, associated with a historic event, activity, or person, or exhibiting other cultural or esthetic values. There are four non-mutually exclusive types of cultural landscapes: historic sites, historic designed landscapes, historic vernacular landscapes, and ethnographic landscapes." (The Secretary of the Interior's Standards for the Treatment of Historic Properties, 1996. p. 4, and Management Policies 2006, Glossary p. 157]

3. A cultural resource may be a "cultural practice" - This policy is a further link between operational nature of ranching in the Historic Districts and the cultural resources and values that are subject to the no-impairment standard: "Cultural resource- an aspect of a cultural system that is valued by or significantly representative of a culture, or that contains significant information about a culture. A cultural resource may be a tangible entity or a cultural practice." [Management Policies 2006, Glossary p. 157]

A reasonable interpretation of DOI and NPS policies is that the operational, working nature of the ranches is part of the cultural resources and values of the Seashore, and that should be reflected in chapters 3 and 4. In describing the affected environment (Chapter 4), I think one can only conclude that alternatives E and F, for example, would result in 'impairment' of the Seashore's historic/ cultural resources and values, or 'unacceptable impacts' at the very least (using those terms as the NPS uses them).

Recommendation: The final GMPA and EIS should reflect that the two Historic Districts are cultural resources that are made up of cultural landscapes, or more specifically, historic vernacular landscapes that are still associated with the historic activity of ranching. Furthermore, the cultural resource consists of both tangible elements, such as historic ranch buildings, and the ongoing cultural practice of ranching. (The Secretary of the Interior's Standards for the Treatment of Historic Properties, 1996. p. 4; Management Policies 2006, 1.4.6 and Glossary p. 157)

The DEIS should be explicit that the 'historic activity' and 'cultural practice' associated with the Historic Districts continues and, together with 'tangible entities' such as historic structures, is an integral part of the cultural resources and values of the Seashore. The language can also be explicit that the NPS is NOT responsible for the economic viability of the ranches. However, the language should also be clear that the preferred alternative allows the following: •Agricultural operations within the limits specified in Alternative B; •Agricultural operations that comply with lease/ permit agreements and ranch operating agreements; •Agricultural operations that employ generally accepted best practices; •Agricultural operations that comply with relevant federal and state laws and regulations, such as those related to water quality, wetland protection, protected species and other species of concern, historic resources, etc.

The language should get across the intention that, if ranches fail in the Seashore during the terms of their leases, it should be because of external factors, such as market forces, operating costs (other than lease/ permit payments), etc., and not from NPS restrictions that unnecessarily limit ranching activities. D. Agricultural diversification

The justification for diversification of ranching activities appears only once in the DEIS under the description of Alternative A (Page 20): "Diversification of ranching activities allows ranchers to react to poor forage production years and fluctuations in the economic market (e.g., the price of cattle, grain, hay)." To enable the economic resilience implied in this justification, I support the inclusion of proposed agricultural diversification activities as described under Alternative B, including limited row-crop production, pasture poultry raising, alternative grazing livestock species, and farm tours and stays, among others, as conditioned by the subzoning framework (Resource Protection, Range, Pasture, and Ranch Core).

The descriptions of potential diversification activities, however, raise questions that must be addressed in the Final GMPA and EIS as follows:

- Why is it necessary to limit the option for 2.5 acres of agriculture to what can be done without irrigation? As an alternative, irrigation, such as drip systems where the Seashore deems sufficient water to be available, might afford greater opportunities. The final GMPA and EIS should consider this option, including mitigation measures for any potential impacts.
- Why limit grazing or browsing by alternative livestock species to pastures? Allowing them in the rangeland zone could achieve natural resource objectives like fire fuel reduction and prevention of vegetation type conversion, as well as protection of sensitive resources. The use of multiple species in a prescribed and rotational manner could provide a diversity of options and opportunities in achieving preservation strategies outlined in the DEIS.
- Why rigidly limit diversification activities to ranch core areas? The limits of scope and scale of diversification are appropriate. However, if a proposed activity might have lower impact (visual, for instance) in an area outside the core area, why not be able to consider it?
- The final GMPA and EIS should address the possible relationship between types of diversification and proliferation of pest species; the allowable techniques that ranchers might use to control such pests, including integrated pest management for pests like gophers; and the potential impacts of pest species on sensitive resources in the park.

#### E. Tule elk management

The DEIS is inadequate in its description of the conflict between elk and dairy cows, its justifications for the size of the Drakes Beach herd to be allowed, and its considerations of management measures. All of those should receive more detailed analyses and justifications in the final GMPA and EIS.

The final GMPA and EIS should explain much more thoroughly why a significantly smaller cap on herd size is not appropriate. It should also discuss more fence options than are included in the DEIS, especially at C and D ranches.

#### F. Stewardship

The final GMPA and DEIS should add a discussion of how ranchers can be encouraged to provide the stewardship that at least meets what is required in their lease/ permits and, preferably goes further. For instance,

are there standards that can be requested or required related to appearance of ranches, especially ranch core areas. At least in ranch core areas, ranchers should be expected to manage unsightly growth of weed species, maintain buildings with repairs and paint, and remove debris piles. If ranching in the Seashore is to be a model for agriculture on public lands, all the ranches - not just some - - should look like the ranchers take pride in their operations. As a neighbor of the Seashore for nearly 50 years, a frequent visitor for longer than that, and a member of the old Citizens Advisory Commission, I have long been concerned about the question of the status of ranching in the Seashore. The current process is finally addressing those questions. The DEIS is an outstanding start. There is now an opportunity, in this last step, to make the final GMPA and EIS even better.

#7568

Name: Lewis, Kari

Correspondence: Dear Ms. Muldoon:

The California Department of Fish and Wildlife (Department) appreciates the opportunity to comment on Point Reyes National Seashore's (PRNS) General Management Plan Amendment, Draft Environmental Impact Statement (hereafter, "the Plan"). We commend your agency on the work you have accomplished to bring the Plan to its current state and agree that active management of the elk herds is necessary to balance management of cattle grazing and elk within PRNS. By addressing elk-cattle conflicts through various means, including exclusion and herd population maintenance, PRNS sets forth a pragmatic rationale for equitable management of public, natural, and agricultural resources on PRNS.

Management of elk populations on PRNS will be necessary in perpetuity. Translocation of elk out of PRNS is not a viable option for population management due to the potential for translocation of diseases, short and long-term costs, risk to staff or contractors, and risk to animals. John's disease is documented to occur in resident cattle and elk herds at PRNS. Even with the current testing means available, it is extremely difficult to guarantee an individual elk from an infected herd is free of the disease organism. Given that John's is a livestock disease, the Department could only support the translocation of elk from PRNS with a comprehensive elk and cattle disease-monitoring program in place and the onsite capability to effectively quarantine and rigorously test for this and other diseases and parasites transmissible to native herbivores or livestock, should appropriate recipient locations be identified. The Department would expect development of such a protocol to involve, at a minimum, the National Park Service, United States Department of Agriculture-Animal and Plant Health Inspection Service Veterinary Services, the Department, and the California Department of Food and Agriculture.

The Department agrees that translocation of elk from one area of PRNS to another to reduce conflict is not a viable management option. The short distances over which elk could be moved within PRNS could easily be covered by elk in a day or less and therefore are too small to biologically justify translocation. The Department is not aware of data that indicate short-distance translocations of large, highly mobile ungulates, such as elk, are successful. In contrast, CDFW knows of several instances where ungulate translocation across distances exceeding the extent of PRNS in which translocated animals returned, or attempted to return, to their place of origin.

The Department also agrees that fencing of elk along the boundary of the Phillip Burton Wilderness Area at PRNS would be exceedingly difficult and prohibitively expensive to construct and maintain and would result in negative impacts to native wildlife. For these reasons, the Department concurs that the likelihood of successfully excluding elk from neighboring lands with fencing in the Phillip Burton Wilderness Area would be low. Any benefits of such an approach would be exceeded by negative impacts to a variety of wildlife. However, selective fencing around portions of certain ranchlands may help minimize conflicts between cattle operations and elk. The Department would gladly engage in discussions about elk exclusion as a management approach.

The Department is concerned, however, that the Plan misrepresents recreational hunting and therefore prematurely dismisses it as a viable option for population management. The Plan describes the rationale, in part, as a need "to ensure the taking of the correct numbers, ages, and sexes of elk". In fact, regulation of populations

for desired numbers, ages, and sexes of elk is easily achieved through the issuance of tags· designated specifically for bull, spike, and antlerless elk, and males of specific age classes can be targeted by setting requirements for the number of antler points (e.g., 4 pis or fewer on at least one antler). Existing regulations are highly effective in maintaining desired numbers and demographics of elk on Department managed lands. In addition, recreational hunting can be a practical and useful way to alleviate conflicts with neighboring lessees when individual elk stray outside of fenced enclosures or between desired zones. Providing hunting opportunities would also generate revenue through the sale of elk tags, which could potentially support PRNS efforts to conduct research and management of elk.

Scheduled closures of portions of PRNS would likely be required in order to conduct safe recreational elk hunts or removals of elk by sharpshooters. Hunter safety and marksmanship orientations could be offered or required prior to allowing hunters into the field as other National Parks have done. For example, the Rocky Mountain National Parks works with hunters to ensure a high level of marksmanship prior to allowing them in the field. Commitments of staff time are likely to be comparable or greater for efforts associated with sharpshooting. Sharpshooting entails extensive carcass handling and disposal by staff or contractors. This could be reduced significantly with a recreational hunting program. Recreational hunting programs also routinely collect biological data on elk which would further contribute to management goals of PRNS.

While the Department prefers recreational hunting to manage the elk population, lethal control including sharpshooters may also be necessary to effectively manage herd numbers. Any elk taken, by whatever means, should be tested for Johne's disease (*Mycobacterium avium paratuberculosis*) to provide information about its prevalence within herds and rangelands of the PRNS.

We appreciate the complexity of the issues you addressed in your Plan for both of our agencies and look forward to providing whatever assistance possible as the PRNS moves forward. If you or your staff have questions, or we can be of assistance, please contact Mr. Brad Burkholder, Game Program Manager at (916) 445-1829 or at [Brad.Burkholder@wildlife.ca.gov](mailto:Brad.Burkholder@wildlife.ca.gov).

#7569

Name: Bennett, Gordon

Correspondence: To: Cicely Muldoon, Superintendent, Point Reyes National Seashore (PRNS) National Park Service (NPS)

Re: PRNS General Management Plan Amendment (GMPA) Draft Environmental Impact Statement

Dear Superintendent:

Background: I represented Marin County on the GGNRA/Point Reyes federal Advisory Commission from 2000 until 2002, during which I successfully mediated disputes between GGNRA and Sausalito over Fort Baker and between PRNS and Bolinas over the Wilkins Ranch. I was a founding shareholder in Westbrae Natural Foods and have almost 20 years' experience with food economics. I have also served on a number of environmental boards, including Marin Audubon and Marin Sierra Club. I have extensive volunteer experience with NPS and was the 2003 Volunteer of the Year for the National Marine Sanctuary Foundation. I now preside over Save Our Seashore (SOS) and support the PRNS Preferred Alternative B ... subject to the following analysis and commentary, summarized below and as followed by detailed analysis.

Diversification: SOS supports the dEIS Diversification proposal but not justified as economic mitigation. We instead suggest that the dEIS consider diversification as mitigation for elk impacts, which would achieve a similar end. We also suggest that the dEIS consider where diversification could both be expanded and limited without altering the dEIS impact studies. We suggest that the dEIS consider that appraisals need to be strengthened in order to fairly compensate the public for use of its lands. We lastly suggest that the dEIS consider places where

diversification text could be clarified and why transparency in appraisals would be helpful.

**Elk Management:** We support the dEIS proposal as consistent with elk management throughout National Parks and as needed to balance the NPS mandates for protection of both natural as well as cultural resources. We suggest that the dEIS consider additions to the Forage Model that may better clarify elk impacts on C Ranch and suggest that the dEIS consider additional forage offsets for C Ranch. Lastly, we suggest that the dEIS consider managing to the threshold of the impact of 120 elk rather than the number of 120 elk.

**Best Management Practices/Mitigations:** We support the dEIS list of mitigations, but we also suggest that the dEIS consider adding reasonable milestones. We further suggest that the dEIS consider transparency so the public can track the progress of mitigation projects.

**Succession:** We support the dEIS succession proposal as consistent with congressional intent, but also suggest the dEIS consider more specificity about NPS discretion over closed ranches.

**Lease Template:** We support the dEIS proposed Lease Template but also suggest that the dEIS consider adding prior health inspection observations. We further suggest that the dEIS consider the value of transparency re the annual meetings.

**Public Use and Enjoyment:** We support the dEIS proposals for use of abandoned buildings, but also suggest the dEIS consider better opportunities for ranch worker housing and affordable housing to offset visitor impacts. We support the dEIS proposal to open ranch roads to bicycles, but also suggest that the dEIS consider a commensurate reduction in less-used trails.

Thank you for the opportunity to comment, we hope you find our suggestions useful.

Sincerely,

Gordon Bennett, SOS President

## ALTERNATIVE B: DIVERSIFICATION

### DIVERSIFICATION: Rationale

The dEIS pg. 20 states the (sole) rationale for considering diversification as follows:

"Diversification of ranching activities allows ranchers to react to poor forage production years and fluctuations in the economic market (e.g., the price of cattle, grain, hay)." SOS has expressed support for limited diversification, but not as justified in the dEIS.

First, multiple Department of Agriculture (USDA) programs already mitigate for "poor forage production years and fluctuations in the economic market." Since 1995 (per the EWG website), the following non-exhaustive list of PRNS ranches have received such USDA subsidies: the Dan Evans Ranch, Mendoza Dairy, Stewart Ranch, David Evans Ranch, Nunes Dairy, Grossi Ranch, Spaletta Dairy, Kehoe Dairy, L Ranch Dairy, Lunny Ranch and the McClure Dairy. For example, the Nunes Ranch received nearly a half million dollars from eighteen different USDA programs.(1) The existence of multiple USDA programs designed to mitigate for "poor forage production years and fluctuations in the economic market" undermines the rationale of the dEIS proposal that would duplicate the USDA economic mitigation by approving diversification.

Second, PRNS ranch families already have both potential and actual diversified income opportunities, including what appear to be extended family ranches in Marin and Sonoma (e.g. twelve Spaletta ranches (2) relationship unknown but likely), second jobs by lessee family members and independent businesses owned by lessee family members, including, for example the Lunny family with a paving business, a compost business, a shellfish growing/ distributing business, and a quarry. The existence of these multiple opportunities for diversification undermines the rationale of the dEIS proposal that PRNS ranchlands should be a significant source of income diversification.

Third, nothing in the enabling legislation, related congressional testimony, or Salazar's directive specifically

mentions diversification ... on the contrary, the entirety of the record speaks to "ranching and dairying" being allowed to continue, with an occasional reference to "agriculture" as simply an abbreviation for "ranching and dairying." Nevertheless, there are some who seek to re-interpret this occasional abbreviation to claim original intent for extensive agricultural diversifications based on everything that was grown, is rumored to have been grown, or could possibly in the future be grown in the dEIS planning area.

Such assertions have no merit and no relationship with "ranching and dairying" as practiced at the time these ranches were acquired by the NPS and when the original intent for continued "ranching and dairying" was discussed.

Last, we can find no reference in the National Environmental Quality Act (NEPA) that requires or allows mitigation of market impacts to NPS tenants/lessees. The purpose of NEPA is to assess the impacts of a project on the environment... not the impacts of the environment on the project. This rationale sets a precedent that could, for example, justify timbering a virgin forest in order to mitigate impacts on the logging company. SOS is concerned that the current dEIS rationale is subject to likely successful legal challenge, which would only prolong the uncertainties of this GMPA. For all of the above reasons, SOS suggests that the dEIS consider a more defensible justification for diversification that does not inadvertently undermine NEPA.

When the NPS purchased the ranches, the understanding was that the ranching families would be allowed to continue ranching subject to the NPS at its sole discretion managing (then-existing) wildlife impacts. But since those purchases, the NPS has introduced free-range Tule elk. According to the November 2017 CDFW Draft Elk Conservation and Management Plan,

"Conflicts between expanding elk and human populations are significant at some locales."

Thus it would seem reasonable for the NPS to mitigate elk impacts on PRNS ranches that were not anticipated in the original understanding. The dEIS (pg. 25) already acknowledges this rationale by its current actions to mitigate elk impacts, including "Providing pasture offsets, including identifying access to additional pasture for ranchers to offset forage lost to grazing elk." Thus we suggest that the dEIS consider amending its rationale for diversification as follows: "Diversification of ranching activities allows ranchers another economic offset to impacts from elk."

#### DIVERSIFICATION: Appraisal

In order to determine to what extent the dEIS diversification proposal represents a reasonable offset to elk impacts (as well as to determine an appropriate rent to PRNS for diversification operations), it will be necessary for PRNS to understand the economics of each diversification.

Under alternative B, "... NPS anticipates development of a master appraisal process managed by the US Department of the Interior to determine FMV for park ranch operations." Such a "master appraisal" process could be effective ... provided it addresses the multiple problems with the prior appraisal process described by our 1/27/16 letter Appendix 6. But it seems clear that this "master appraisal" cannot determine FMV rents for diversification proposals yet to be made. Thus, case-by-case FMV appraisals will need to be made based on the specifics of each diversification proposal, as was done for the one existing (chicken) diversification operation. Our 1/27/16 letter pointed out that this former appraisal was deeply flawed, with a claimed FMV rent of only \$997 per year for a chicken operation with revenues estimated at \$143,258 per year (i.e. rent at 0.7% of sales vs PRNS grazing land rent at  $-\$84\text{AU}/\$667=12.6\%$  of gross sales). Unfortunately the current dEIS appraisal process for this same chicken operation is similarly deeply flawed,<sup>(3)</sup> which points to the need for the dEIS to more clearly define (or significantly reassess) how it intends to determine FMV for diversification operations.

Further, diversification needs to have enforceable and enforced limits so that it does not in any substantial way alter the historic "ranching and dairying" landscape or become a substitute for income from "ranching and dairying." The dEIS sets explicit sideboards for diversification re the number of sheep, goats, chickens and acres of row crops, but sets no comparable limits on diversification income, without which diversification income could be so substantial that it could far exceed not just amounts needed for elk offsets, but could also exceed total ranch income (4).

We suggest that the dEIS consider limiting projected income from all diversification at the site to be at most a

combined 10% of the projected income from "ranching and dairying" at the site (unless the rancher can document the need for a greater offset for elk impacts). Such a 10% limit would also serve to quantify the dEIS language regarding "small scale processing" and would also likely be considered a de minimis departure from "ranching and dairying" as described in the enabling legislation, related congressional testimony, and Secretary Salazar's directive." Lastly, as an aside, the Marin County Crop Reports show that combined ranching and dairying income can fluctuate by 20%, so a 10% limit on diversification income intended to mitigate elk impacts would incidentally serve to flatten out those ups and downs. Thus we urge that the dEIS should consider how best to assess income from ranching operations, income from diversification operations and the appropriate rent for the diversification.

#### DIVERSIFICATION: Fixed Cash Rent

There are two common methods for agricultural landowners to assess rent for use of their land: "fixed cash method" and "crop share method." The AU-based rent calculation for the current chicken operation represents (albeit poorly) the fixed cash method. If this AU method were to be carried forward for 18 chicken operations with 500 layers each, then that would result in a grand total of merely \$3,094 rent ( 0.64% of gross sales) for chicken operations grossing a combined \$481,950. This compares to the previous estimated rent percentage (12.6% of sales) for PRNS grazing land and standard crop share agreement that have rent at 25% of sales.

In our opinion, such a fixed rent calculation for chickens based on AU would significantly shortchange the public for use of its land and unnecessarily cripple PRNS in its ability to manage diversification activities and fund environmental protection. Assessing/monitoring for multiple diversifications almost certainly requires more effort and cost than for grazing land.

If the fixed cash method is used to determine diversification rent, then to avoid the problems in past and current FMV appraisals, it would seem necessary for industry specialists in each diversification type who could provide a fair estimate of both projected income and appropriate rent. The dEIS should consider the cost and complexity of multiple separate such appraisals.

#### DIVERSIFICATION: Crop Share Rent

Consequently, we urge the dEIS to consider the alternative, which is a crop share agreement that appears to be the easiest method to assess both income and the rent. A typical crop share agreement considers 25% as rent to the land owner and could generate as much as the dEIS socioeconomic estimate of total PRNS sales of \$16M x the suggested 10% diversification limit of 10% x the standard 25% crop share rent = \$400,000 in rental income for PRNS (vs -\$480,000 in estimated rent from grazing)(5). A 25% crop share agreement would help PRNS ranchers to offset elk impacts and also help PRNS by generating rental income that could go toward better monitoring, more effective management and additional environmental improvements.

A crop share agreement would also obviate the need for the specialized assessments of the "fixed cash method" because the rent would be assessed retroactively based on the rancher providing accurate sales records for the diversification (and ranching sales). Thus the dEIS should consider modeling such language requiring sales records on the similar language in Lease Template #7: Lessee shall provide all sales documentation to NPS upon request demonstrating that Lessee has an ownership interest in all cattle on the Premises.

Lastly, extreme care must be taken so that diversification operations allowed today do not become a new baseline against which new diversification proposals are measured tomorrow. To avoid such an outcome is why we suggest that the dEIS consider measuring diversification income against income from "ranching and dairying ... so that the public can be certain that PRNS stays true to the original intent that "ranching and dairying" (rather than diversification) be allowed to continue as the principal use and be proportionate to estimated economic impacts from elk. The above suggested 10% limit could (if fully utilized on all PRNS ranches) generate as much as \$1.6M in gross sales for ranchers.

Further, elk impacts on the average ranch (with the exception of C Ranch) are not expected to exceed 10% of sales for the average ranch and thus the proposed 10% diversification income limit would seem to provides

reasonably adequate mitigation for elk impact costs (see our Elk comment).

#### DIVERSIFICATION: Definitions

Consequently, we urge that the dEIS should consider making its programmatic policy clearer (example follows) when it describes allowed diversifications (pg. 37).

"Diversification of ranching activities under alternative B could include new types of livestock, row crops, horse boarding that includes a public component. public-serving ranch tours and farm stays, small-scale processing of dairy products (e.g., cheese) produced on site. and sale of local agricultural products produced on site.

Diversification activities authorized in the...Ranch Core subzone:

- New Types Qf Livestock species (pigs, chickens, sheep, and goats)
- Horse boarding activities that include a public component (riding/renting)
- Row crops
- Public-serving ranch activities that support park goals for interpretation and education (i.e., farm stays, ranch tours)
- Small scale processing of dairy products from milk produced on site."

#### DIVERSIFICATION: Ranch Core Opportunities

There appear to be discrepancies between the Appendix A's Alternative B Ranch Maps and the underlying leases on the PRNS website, which introduce confusion as to whether diversification limited to ranch cores would be allowed. For example, Figure 20 shows Home Ranch with a developed complex, but leases AGRI-8530-9007 and -1003 do not include this developed complex, and instead reference only "incidental use of a ranch house." The dEIS should consider clarifying that AGRI-8530-9007 and -1003 will not be authorized for diversification that is limited to ranch cores (i.e. incidental use of a ranch house qualifies as neither a developed complex or a ranch core).

Figure 27 show the Mcisaac/Cheda Ranch (Lease 8530-1000-9012) with 2 developed complexes, but the dEIS should consider clarifying that if a ranch has a developed complex ranch core, then the lessee will have one ranch core diversification opportunity, no matter how many ranches with ranch cores are in the name of that lessee. This same logic should apply throughout the dEIS, including but not limited to A and E Ranches (Leases 8530-2600-9002 and -9009) and the Percy Ranch (Lease 2600-10-1002).

A related issue concerns families with multiple ranches with ranch cores, at least one of which are in (or could be changed to) virtually the same, but not identical lessee names. Simply changing one name from a list of lessees on should not add a ranch core diversification opportunity. Thus the dEIS should consider making clear that when names on different leases that are substantially (>50%) the same and more than one of the leases has ranch core, then only one ranch core diversification opportunity will be allowed per family. For example, two ranches with ranch cores that are leased to same four lessees per the prior paragraph should have one ranch core diversification (e.g. 5 pigs) opportunity and changing one of the four lessee names on one ranch lease should not create a second diversification opportunity (i.e. 10 pigs).

#### DIVERSIFICATION: On-Site

Without such clarification re on-site origin, the dEIS could be interpreted to mean, for example, that milk could be trucked in from dairies outside PRNS for "small scale processing" ... or that 18 farmers market could be established to sell local agricultural products from outside PRNS, We do not believe that any of these examples represent the intent of the dEIS, but we urge that the dEIS further clarify that intent.

We also note that first sentence of the above dEIS diversification references "sale of local agricultural products" but the bulleted list below of activities potentially authorized in the Ranch Core subzone does not reference "sale of local agricultural products." We assume this to mean that the dEIS has reasonably concluded that the traffic, heath-and- safety and liability impact of 18 farm stands (whether in ranch cores or roadsides) is unacceptable. Instead, we suggest that the dEIS consider expressly prohibiting such sales and instead expressly authorize sale of agricultural products produced on PRNS ranches at weekend seasonal "farmers markets," e.g. in Point Reyes



Station or in the visitor parking lot at Bear Valley or Drakes Beach.

#### DIVERSIFICATION: Horses

PRNS has had legacy horse boarding operations operating on public land that were de facto private facilities open only to family and friends with no public component. These operations have now or will soon end but the dEIS diversification proposal should not breathe new life into this legacy. The dEIS allows farm stays and ranch tours as diversification only when they "support park goals for interpretation and education." A similar logic should apply to boarding private horses, so the dEIS should consider authorizing horse-boarding only when the boarding opportunity is open to the public and there are rental horses available so as to support park goals for recreation and public access. This is the same public component logic the GGRNA applied to the Golden Gate Dairy's then private-only horse boarding.

The dEIS should also consider whether more publicly available horses on diversified ranches would materially impact existing public horse boarding/riding concessions in the Seashore and if so, should consider a cap on the number of horses or operations that would be allowed as diversification.

#### DIVERSIFICATION: Row Crops

The dEIS also describes the 2.5 acres potentially authorized for diversification in potentially contradictory ways, so the dEIS should consider clarification. The predominate definition

(emphasis ours) is per Page 37: Up to 2.5 acres of row crops not requiring irrigation would be allowed in previously disturbed areas in the Ranch Core subzone. However Pg. 51 reads differently: Ranch Core subzone: the developed complex of buildings and structures on each individual ranch including up to 2.5 additional acres of disturbed land immediately adjacent to the developed complex. Page 51 (and similar phrasings) should be corrected to conform to the Page 37 description of the 2.5 diversification acres as being within the -10 acre Ranch Core, not 2.5 acres in addition to the -10 acre Ranch Core.

Further, the dEIS does not make explicit the definition of its term "row crop." This leaves open the possibility that any crop planted in a row is a "row crop." We urge the dEIS to consider referencing the USDA California definition of a row crop that explicitly excludes "a crop planted in rows." This would eliminate the previously cited extreme example cited of exotic mushrooms planted in rows and would also eliminate the growing 21/2 acres of livestock food.

Although this more explicit definition of row crop would also presumably eliminate the growing of grain that could be processed (by a "small scale craft distillery) into whiskey for on-site bottle sales of agricultural products produced and processed on site, the dEIS should consider explicitly prohibiting crops grown for alcohol distillation. At the USDA's estimate of 34 bushels of rye per acre and two gallons of 190 proof whisky per bushel, then the 2112 acres could produce 2,027 of 750ml-bottles of 90 proof whisky for sale. This is just another example of the Pandora's Box that diversification could open and why diversification needs to be carefully defined, monitored and limited. Cannabis is another crop now illegal on federal land, but perhaps not for long, so the dEIS should also consider explicitly prohibiting diversification into cannabis.

#### DIVERSIFICATION: Pasture/ Chickens

The dEIS Alternative B (pg. 37) reads "Diversification activities authorized in the Ranch Core and Pasture subzones are ... Pasture subzone: Livestock species (sheep, goats, chickens)." But there appear to be two separate issues here that have been rolled into one sentence. Sheep and goats are proposed to be eligible to be authorized in the pasture zone of all ranches, but chickens are proposed to be eligible to be authorized in the pasture zone of only the 18 ranches with a ranch core (dEIS pg. 187: "if all 18 ranches that are eligible to raise chickens..').

The dEIS does not make clear the rationale for this distinction. Appendix D pg. D-48 states:

"Conduct daily inspections and quickly pick up livestock (i.e., sheep, goat, and hog) and fowl (i.e., chicken) carcasses ... " The requirement for daily inspections for sheep and goats is not a function of having a ranch core because they are authorized on pastures without a ranch core. Chicken huts need to be moved and inspected daily, so it is not clear why chickens are limited only to pastures with a ranch core. Further, if diversification is going to offset elk impacts, the handful of ranches without a ranch core could benefit from diversification into chickens just as much (if not more) than diversification into sheep and goats.

The dEIS also does not make clear the rationale for the 500 chicken limit. A 500 chicken cap produces wildly disproportionate income impacts: income from 500 chickens a small PRNS ranch would equal 100% the income from beef on that ranch, while income from the same 500 chickens on a PRNS dairy would represent less than 1% of dairy income. But, as we have suggested, income from diversification should remain supplemental to, not a replacement of income from "ranching and dairying."

Further, chicken huts need to be moved daily so that the intensity of chicken manure can be spread rather than concentrated (dEIS pg. 187), so 500 chickens on a 100-acre PRNS ranch would appear to have 5 times the potential impact compared to the same 500 chickens on a 500-acre PRNS ranch. Further still free-range chicken and cattle are synergistic (chickens control bugs from cattle dung while fertilizing the soil for cattle forage). For all these reasons, we urge the dEIS to consider whether it would make better economic, elk offset and environmental sense to retain the dEIS-impact-analyzed 9000 total chickens but divide them among ranches in the same way that sheep and goats are allocated (as a percentage of AU vs the current 500 cap).

Using the AU adjustment suggested below for sheep and goats, the 2,400 beef AU plus the 3,130 dairy head ( dEIS pg. 52) would represent an AU equivalent of 3,443 for all PRNS ranches combined. Dividing 9,000 chickens by 3,443 AU equals -2.6 chickens per AU. Thus under this allocation logic, the smaller (40 AU) PRNS ranches could be authorized for -100 chickens, while the larger (-285 AU) PRNS ranches could be authorized for -750 chickens.

The dEIS also limits the number of chicken sheds to 3. The dEIS should consider whether limiting the height and color of the sheds could result in less visual impact than limiting the number. For laying hens, the existing chicken operation uses large plastic covered hoop sheds, with a peak that appears to be 10-12 feet high (broiler coops are only 2 feet high). Other Marin pastured egg producers use old travel trailers with a height roughly the same. Fifty-four dilapidated aluminum-sided travel trailers scattered across PRNS pasture land could create 54 unnecessary visual impacts. Thus the dEIS should consider limiting the height of chicken huts to 6 feet (to allow walk-in egg collection) and limiting the colors to those beiges and greens that correspond to the pasture colors.

Further because the dEIS (pg. 187) notes that "chicken manure could adversely affect soil because of its high content of nutrients and heavy metals," and "Moving chicken huts using motor vehicles could result in adverse effects ... "it would seem that, for example, six half-sized huts could be more easily moved by hand than 3 full-sized huts. Thus the dEIS should consider removing the limitation on the number of huts and adding a mitigation that requires any chicken hut on pasture to be moved only by hand and no less than once per day.

#### DIVERSIFICATION: Pigs

The dEIS puts a maximum limit on sheep (50) and goats (67), on chickens (500) and on row crops (2.5 acres), but there are no limits on the number of pigs that could be raised within each of the 18 ten-acre ranch core zones. Assuming 5 acres (1/2) of the ranch core could be devoted to pigs as a diversification, the number of feeder pigs per ranch could be as high as 250 with the total number on PRNS ranches at  $18 \times 250 = 4,500$  pigs. The dEIS should consider whether it is appropriate to set an expectation with ranchers and the public that the number of pigs allowed as diversification is limited only by available space in the ranch core and if that expectation is not appropriate, then establish a limit per below:

Our understanding (Point Reyes Rancher personal communication) is that pigs were historically used on PRNS ranches to consume both kitchen waste and agricultural waste (chiefly whey from cheese operations) and thus their numbers were de facto limited to a few pigs per ranch due to the limited amount of food available from on-site sources. Pigs also are "escape artists" that can "root" under standard fencing. Escaped pigs go rapidly feral and do great environmental damage ... with a conservative annual estimate of \$1.5 billion in economic damage

nationally to agriculture and the environment." Having as many as 250 feeder pigs in a ranch core would make containment difficult and the discovery of one missing pig out of 250 also more difficult. Thus the dEIS should consider prohibiting the importation of hog feed from off-site sources and limit on the number of allowed pigs to no more than five.

#### DIVERSIFICATION: Pasture/ Sheep and Goats

The dEIS pg. 38 states: "For individual ranches, grazing by sheep and goats in the Pasture subzone would not be allowed to exceed 10% of their authorized AU or 10AU equivalents if the authorized AU is greater than 100 (whichever is less)." But the problem with the way this limitation is stated is that most PRNS dairies do not have authorized AU ... instead they have an authorized number of cattle. It should not be the intent of the dEIS to de facto prohibit dairies from diversifying with sheep or goats. Thus we urge the dEIS to consider how to apply the 10% AU concept that works for beef ranches also to dairy ranches. A rough method could be to consider that organic dairy cows must get a minimum ~ 1/ 3 of their dietary needs from inground forage, whereas beef cattle get closer to 100% of their needs from in-ground forage, thus 10% of authorized beef AU is approximately equal to 3.33% of authorized dairy head.

#### DIVERSIFICATION: Structures

Lastly, we urge that the dEIS consider requiring a bond to guarantee that any structure or alteration proposed to be built for use in any diversification operation will be removed and the area restored to its prior condition. We don't want a repeat of the Drakes Estero clean up that cost the NPS \$4M to remove nearly 1800 tons of mariculture debris.

#### DIVERSIFICATION: Transparency

The dEIS (pg. 37) states that proposed Alternative B fair market value (FMV) master appraisal process "would allow for ... more transparency regarding rental rates in the park." But the dEIS does not explain how that transparency would be achieved. We request that the dEIS commit to posting these appraisals on the PRNS website (with appropriate and necessary redactions). Prior leases gave only the lessee the right to challenge an appraisal. We request that the dEIS allow the public the same right as Lessees to review and challenge these appraisals.

We also urge that the dEIS consider ways to make sure that the master appraisal process fixes problems noted in our 1/27 /16 letter (incorporated by reference), including (for structures) : Poor/Unidentified Comps; Special Lease Provision (Maintenance) Discount; Bulk Lease Provision Discount; Buildings claimed as Surplus to ranch use may not be surplus to residential or diversification use, Hay Barn Rent; and Buildings Not Used. Our 1/ 27 / 16 letter also identified problems in the former appraisals for grazing land, including Poor/Unidentified Comps; Distance from Petaluma Discount; Public Access Discount; Possessory Tax Discount; Chemical Restriction Discount; Limits on the Eradication of Non-Forage Ground Cover Discount; and Regulations on the Control of Predators Discount.

#### ALTERNATIVE B: ELK MANAGEMENT

##### ELK: Overview

According to the US Fish and Wildlife Service and the California Department of Fish and Wildlife (CDFW), November 2017 Draft Elk Conservation and Management Plan, Tule elk are neither threatened nor endangered. Elk populations are booming with 5,700 Tule elk and "Conflicts between expanding elk and human populations [being] significant at some locales."

In the absence of natural predators, lethal management measures for ungulate populations are in widespread use both nationwide and in California (6) Consistent with the widespread use of lethal management, the NPS already stated in 1998 that it would use lethal means to manage the free-range elk herd (7).

Many of the public appear inconsistent in their belief that the NPS should not manage elk (a charismatic megafauna), but at the same time the public expresses no concern about NPS management of non-charismatic wildlife. But, in our opinion, the NPS must manage its wildlife based on science, rather than charisma(8).

Further, many of the public believe that the NPS is only responsible for protecting wildlife, but this belief is contradicted by the statutory requirement that the NPS must also protect cultural and recreational resources (without impairing natural resources). The public's confusion is understandable, given that most NPS-managed sites are either wildlife-oriented (Yosemite) or culturally-oriented (the Presido), whereas PRNS is a blend. Thus, PRNS management of the Drakes herd to protect cultural resources (historic ranches) is consistent with both NPS management elsewhere and with other PRNS wildlife management efforts(9).

Some of the public have argued for the elimination of the ranches to benefit the elk while others have argued the opposite position for the elimination of the elk to benefit the ranches. But the dEIS states: "NPS has set a population threshold of 120 adult elk [ for the Drakes Beach herd]." This appears to be a reasonable compromise between these two opposite positions.

#### ELK: Inconsistencies

The dEIS (pg. 24-25) describes a number of elk impact mitigations in Alternative A, including : "Providing pasture offsets, including identifying access to additional pasture for ranchers to offset forage lost to grazing elk."

The dEIS (pg. 40) re Alternative B describes all the actions on pages 24-25, but omits Providing pasture offsets : "NPS ... would continue to take actions described for alternative A to reduce conflicts related to the presence of elk on ranches (e.g., hazing); mitigate elk damage to ranches; and conduct monitoring, disease testing, and reporting."

The dEIS should consider making these two statements consistent by adding pasture offsets to the page 40 Alternative B description.

#### Elk: Forage Model additions

To provide a more complete context within which to assess the proposed 120 elk, we urge the dEIS to consider breaking out components of the Appendix I Forage Model, which now does not quantify the amount of forage that "disappears" per the Appendix I references. Some of this forage disappearance is likely be due to life cycle of the forage plants themselves, but we believe another important component is the impact of multiple other forage-consuming wildlife, including deer, birds, gophers and rabbits. We believe it would help the public better understand elk impact on ranch forage if the elk impact was considered in the context of other wildlife impact on ranch forage.

We also suggest that the Forage Model could be a better predictor if it broke its current use of total annual rainfall data into at least two segments (early and late). The impact on forage of the timely rainfall can be more important than total annual rainfall.

#### Elk: Impact of the 45 Roaming Limantour Bulls

The dEIS (pg. 81) states: "Approximately 45 males spend time on ranch lands at any one time with most concentrated use on Home Ranch, N Ranch, D. Rogers Ranch ... Most males return to the wilderness areas ...from summer into fall." According to PRNS wildlife biologist Dave Press (8/26/19 email): "Tule elk at Drakes Beach are the equivalent 0.26 to 0.47 animal units based on the actual weights." Assuming the higher .47 AU for elk males, then those 45 roaming Limantour bulls represent 21.15 AU x 9/12 months = 15.86 AU of forage consumed. We will use this figure in the subsequent analysis of the 45 Roaming Llmantour Bulls.

The dEIS appendix K shows Home Ranch with 300AU, N Ranch with 90 AU and D, Rogers Ranch with 55 AU for a total of 445 AU. Assuming all the bulls were concentrated only on these three ranches, the AU impact would be

roughly 3.6%.

However, we also believe it is useful to look at absolute economic impact in dollars in addition to looking at the forage impact in percentages. Using the dEIS estimate of \$1.6M in beef sales and 2400 beef, one head of beef represents \$667 in sales. Thus the estimated 15.85 AU of forage consumed by the roaming Limantour elk represents roughly \$10,567 in lost sales (3.6%) out of an estimated \$296,815 in estimate sales for these 3 ranches combined.

Thus, it would appear that the 10% limit on income from diversification (if fully implemented on these ranches) would more than suffice to mitigate for the lesser percentage elk impact on income.

Lastly, the dEIS (pg. 41) commits to maintaining this minor level of impact when it states: "Elk from the Limantour herd would be allowed to wander ... and they would be monitored closely and managed in consideration of ranch operations. Hazing and lethal removal may be used ... to mitigate for impacts on ranching operations. Thus, for the 45 bulls, the dEIS appears to commit to maintaining an ( un-quantified) level of ranch impact rather than a specific number of elk. Committing to a level of impact provides NPS with operational flexibility in managing elk.

For example, if all 45 roaming bulls began to concentrate only at the D. Rogers Ranch with its 55 authorized AU, then this might be determined to be an excessive 28.8% (15.86/ 55) impact on forage and income and thus action might be taken to reduce the number of not-roaming elk on D, Roger Ranch below 45. Conversely if the 45 roaming bulls began to spread out evenly across all PRNS ranches (rather than just on Home, N and D. Rogers Ranches), then it is possible that more than 45 bulls could be allowed yet have the same minor level of impact per ranch.

Elk: the Drakes Beach Herd and C Ranch

The Forage Model (Appendix I) for C Ranch (the most impacted by elk) shows that the difference between 3 elk and 170 elk is the difference between an 81% chance of meeting the 1200 RDM vs a 75% chance ... a seemingly trivial 7% difference. Thus it would appear that more than 120 elk could be supported on C Ranch without unduly impacting forage.

The dEIS references but does not quantify the non-forage impacts of elk on C Ranch (broken fences, pipes, injured cattle etc.), which the dEIS commits the Seashore to mitigate. We acknowledge that such mitigation would be facilitated if C Ranch would submit documentation of impacts, which to-date has been lacking. Lack of documentation allows stories of valid onetime/ occasional impacts to be repeated, making it appear that the impacts are chronic. As most of the public who have insurance policies understand, insurance companies require extensive documentation before issuing reimbursement checks. PRNS, as custodians of the public's money, is no different, so it is not clear to us why the C Ranch operator would fail to document elk impacts in order to support the long-term viability of the ranch.

Regardless, it would be useful if the Forage Model disclosed more detail. Unfortunately although numerous percentages, numbers and durations are given on dEIS page 91 for the time males vs females spend in one place or the other and at one season or the other, the crucial question of how much forage these elk consume of C Ranch remains unclear in the dEIS, although it presumably is a specific value that is entered into the Forage Model.

Assuming the midpoint (of the Dave Press 8/ 26/ 19 email) of 0.365 AU for Drakes Beach elk, then that is an effective AU equivalent for the 120 Drakes Beach herd of 0.365AU times 120 elk = 43.8 AU of forage consumed. But that 43.8 AU is consumed on a combination of three different areas: C Ranch, E Ranch and unpermitted grazing areas. For purposes of this analysis we will assume that absent hazing, the elk would spend 1/ 3 of their time on the C Ranch portion of the three areas which would result in a forage impact on C-Ranch of 14.6 AU

Further, the dEIS pg. 98) discusses the effect of hazing in some detail but again without disclosing the specific value that is entered into the Forage Model: "During initial hazing efforts, the elk were hazed in the morning but often returned by evening. Through repeated efforts, hazing has been more effective at keeping elk away from C Ranch for longer periods. Hazing has not been very effective for bachelor groups." For purposes of this analysis we will assume hazing is 50% effective at reducing forage impacts on C Ranch, which results in a net forage impact

on C Ranch of 7.3 AU. As we have stated re the usefulness of providing the impact of other wildlife on ranch forage, we similarly believe it would help the public better understand the reasonableness of the calculated elk impact on C Ranch forage if the actual values entered into the Forage Model were disclosed. Absent this data, our net elk forage impact of 7.3 AU on C Ranch is necessarily rough.

We also note that the Forage Model incorporates the mitigating effect of hazing, but appears to ignore the 2003 pasture offset that also serves to mitigate elk impacts, as noted on dEIS page 25: "Providing pasture offsets, including identifying access to additional pasture for ranchers to offset forage lost to grazing elk."

When D Ranch closed, the Drakes Beach herd had already established itself. D Ranch was ultimately divided between C Ranch, E Ranch and the Drakes Beach elk. As a result of this division, C Ranch got an additional 36 AU. The omission of this offset from the Forage Model demonstrates the same concern we expressed in our Diversification comment: "Extreme care must be taken so that diversification operations allowed today do not become a new baseline against which new diversification proposals are measured tomorrow." In the case of elk at C Ranch, it appears that the pasture offsets made yesterday have become a new baseline against which elk impacts are measured today.

#### ELK: Dollar vs Forage Impact

Using the previously estimated 7.3 AU of forage consumed by the Drakes Beach herd, it would appear at first blush that the previously-added 36 AU for C Ranch cattle has already more than compensated for the forage consumed by 120 Drakes Beach elk on C Ranch. This may be why the Forage Model shows little impact difference between 3 elk and 170 elk. However, not all forage is created equal. Dairy cows need to be milked twice a day, so there is a limit to how far they can forage. The D Ranch Pasture A that was given as an offset appears to be at such a distance from the C Ranch milking barn that it is used only for heifers (that are not milked). Consequently, if the offset is 36 AU for un-milked heifers, while the elk impact is on the forage used for milk cows, the two situations are not the same.

Further, if the estimated 7.3 AU of forage consumed by the Drakes herd at C Ranch is translated into absolute dollars of economic impact (rather than forage percentage impact), the result appears different than the trivial result of the Forage Model. Because organic dairy cows must consume at least 1/3 of their forage from in-ground forage, the estimated 7.3 AU consumed by elk reduces dairy cow numbers by 21.9. Using the dEIS estimates of dairy cow income (\$14.4M) and dairy cow numbers (3,130), a dairy cow represents \$4,601 in sales and 21.9 less cows represents an income loss of \$100,754 to C ranch. Applying that \$4,601 figure to Appendix K (Table 3-1) figures showing C Ranch with "200 milk cows, 40 dry cows, 100 heifers, 2 bulls," then C ranch has an estimated total income of \$1,573,542 and the loss of \$100,754 represents roughly 6.4% of C Ranch income. Our estimates are rough, but they do appear to show that the dollar impact from elk on C Ranch may be more significant than the Forage Model appears to show.

Although it would appear that the 10% limit on income from diversification (if fully implemented on C Ranch) would more than suffice (as it did for the Roaming Limantour bulls) to mitigate the percentage of elk impact on income at C Ranch, we urge the dEIS to consider whether the estimated absolute dollar impact of \$100,754 may warrant additional forage offsets if the Drake Beach herd is to remain at 120. Added forage offsets would be consistent with dEIS page 25: "Providing pasture offsets, including identifying access to additional pasture for ranchers to offset forage lost to grazing elk."

#### ELK: Forage Offset

To this point of forage impact, there appears to be two anomalies in Appendix K Table 3-1 that could be usefully applied to C Ranch mitigations. As noted above, when D ranch was divided, E Ranch got Pastures B and C, which lease# AGRI-8350-2600-9013 states is for "Grazing heifers on Pasture B at 72 Animal Unit's for 6 months per year (432 AUM's) and grazing beef cattle on Pasture C at 51 Animal Units for 6 months per year (306 AUM's), for a combined total of 738 AUM's annually." Thus this lease language shows  $738/12 = 61.5$  AU, not the 123 AU shown in Appendix K table 3-1, which appears to assume that the specified Animal Units are for 12 months instead of the actual 6 months. Thus the dEIS and Appendix K and L analyze the impacts of an overstated (by 61.5) number of

cattle AU. Rather than correct this anomaly, it could better be used.

Table 3- 1 correctly shows A Ranch with 350 milk cows, 50 dry cows, 90 heifers, and 6 bulls permitted but only 200 milk cows, 45 dry cows, and 35 heifers actual. Consequently, there appears to be more than enough capacity at A Ranch itself to absorb the 61.5 AU from D Ranch's Pastures B and C, which are currently used by A Ranch and which we suggest could instead be used by C Ranch with no change in the number of AU studied by the dEIS.

Thus in light of the growth of the Drakes Beach herd between 2003 and now, we urge the dEIS to re-consider the 2003 split of D Ranch and re-allocate its Pastures B and C to C Ranch. The additional 61.5 AU may not all be useable for C Ranch due to the distance from the C Ranch milk barn, but at least part of Pasture B is west of Drakes Beach Road. Even if none of Pastures B and C can be used to supplement dairy forage, and all went to beef forage, the added 61.5 AU combined with the previous offset of 36 AU would represent roughly  $97.5 \times \$667 = \$65,033$  of added income to offset (-64.5%) the estimated \$100,754 in income lost to elk impacts.

We note that D Ranch was a "closed" ranch that before the 2003 division and was not part of A Ranch. We have suggested that moving forward, (see Succession comments) that the dEIS should make clearer that new operators of closed ranches will not have the expectation of succession or 20-year leases because closed ranches provide PRNS important opportunities to make adjustments in ranch management as new situations arise. The D Ranch is a perfect example of this need to make adjustments. Such a re-consideration of the 2003 D Ranch split would benefit ranching because it would mean no loss for A Ranch, yet also provide more pasture offset for C Ranch, which has been hardest hit by elk impacts and the most vocal in pressing for complete removal of the elk. Thus we would also argue that PRNS could make this change on a purely environmental basis in that it would relieve pressure on the elk and insure that elk and cows could co-exist.

#### ELK: Manage to Impact vs Number

Lastly, while we support the concept of the 120 elk threshold for the Drakes Beach herd as mitigated above, we also suggest that the dEIS consider maintaining the level of impact from 120 elk, rather than the specific number of 120 elk. As noted re the 45 bulls, committing to a level of impact provides the NPS with useful operational flexibility in managing elk.

#### ALTERNATIVE B: APPENDIX D BEST MANAGEMENT PRACTICES (BMPS)

##### BMPS: Milestones

One of the rationales for extending leases to 20 years (with succession) was to allow ranchers to recoup their investments in environmental mitigations. We understand that these mitigation funding is usually split between agency and rancher...is not 100% within the control of either party and thus occurs "as funding, permits, and priorities dictate" (Appendix pg. H-1). But the dEIS, as written, could result in conditions being in 20, 50 or 100 years exactly as they are now.

For example, Appendix L 8.2.2 notes: "approximately 370 acres ... includes resource protection exclusion areas to prevent cattle grazing along the Drakes Estero shoreline, including portions of Creamery Bay, Schooner Bay, and Home Bay." But there is no indication of what percentage of the Estero shoreline protection this represents .... and the maps (dEIS Figure 6) are at such a gross scale, with each ranch map at a different scale that it is impossible for the public to understand the proposal. Similarly, Appendix L 8.2.2 notes: "In the Olema Creek watershed, new resource protection exclusion areas would restrict grazing from approximately 1.9 miles of riparian habitat ... but no indication of the extent of this habitat, what percentage has been protected, what remains to be protected and what percentage the proposed 1.9 miles represents.

This contrasts with aborted 2010 GMPA Figure 24, which graphically represents the proportion of fenced vs unfenced creeks and pg. 307 that quantifies: " ... 440 acres ... of herbaceous wetlands are in areas ... used for livestock ... " Thus we suggest that the dEIS should consider the importance of describing in both text and graphically each problem proposed to be mitigated, the percentage already mitigated and reasonable milestones by which the public should expect the remaining portion to be mitigated. The dEIS should also consider a webpage map to allow the public to see how the ranch zonings fit together, which may reveal other problems

currently un-knowable. The dEIS should also consider posting mitigations on its website so the public can follow progress toward these milestones. For example, the dEIS should consider setting a goal that within 10 years, cattle will be fenced out of creeks, herbaceous wetlands and shorelines.

Various practices are listed to manage impacts from "sacrifice" areas (feed and watering sites), but nothing is said about minimizing sacrifice areas such that no bare ground is exposed. Thus the dEIS should consider setting a goal that within 5 years, sacrifice areas shall be minimized by rotating among several beef feed areas such that no feed area has exposed ground.

Appendix D pages D-10 to D-11 provide reasons that ranchers should install alternative water sources but do not encourage installation of a single such alternative water source. The dEIS should consider setting a goal that within 5 years, watering areas shall be interconnected and water piped among disparate troughs such that no watering area has exposed ground.

Appendix D page D-10 states: "The area around the spring or seep would be fenced to control livestock access and improve habitat value." Nothing is said about ponds. The dEIS should consider setting a goal that within 5 years, spring and ponds shall be wildlife-friendly fenced at a minimum of 50 feet from the source in order to control livestock access and improve habitat.

Appendix page D-19 lists manure management actions that reduce greenhouse gas and California law (SB 1383) that targets "a 40 percent reduction in methane emissions from 2013 dairy and livestock." The dEIS should consider setting a goal that within 10 years, dairies would convert to management methods that achieve a 40% reduction in greenhouse gas.

Appendix pg. H-2 defines: as "Range subzone" where "Native grasses [are the] dominant species." Given that only 1% of California's native grasslands remain and that "90% of the state's threatened and endangered species are dependent on [these] grasslands", the dEIS should consider that native grass is a "keystone" species whose importance is not a function of being merely >50% in abundance or biomass ("dominant") in a plot. Thus the dEIS should consider a much lower metric than 50% ... for example, the ratio of the planning area dominated by native grass (9% per dEIS pg. 74). The dEIS should also consider proactive native grass restoration projects vs only reactive re-planting with native grass after a disturbance (Appendix pg. D-4).

Further, the dEIS should consider resolving the apparent conflict between Appendix L pg. 70 which states "The zoning framework would specify that only grazing would be authorized in approximately 70% of the action area" and the dEIS pg. 35, which notes that the 28,700 acre planning area (aka the action area) is divided into a Resources Protection Subzone of "2,600 acres (where only prescriptive grazing would be allowed), plus a Range Subzone of "16,900 acres and a Pasture Subzone of 9,000 acres in both of which grazing would be allowed. Thus dEIS would allow grazing in at least 91 % of the action/planning area (not 70%).

#### BMPS: Guard Animals

Appendix D pg. 49 establishes criteria for guard animals (dogs, llamas, donkeys), to protect sheep, goats and chicken in the pasture zone. We suggest that the dEIS consider (in order to reduce impacts on hikers and wildlife) limiting these livestock species to fenced sub-pastures. Further, according to PRNS chicken ranchers, a herd-trained guard dog will react to a perceived threat by defensively positioning itself between the flock the threat. A perimeter-trained dog will aggressively confront the threat at the limit of the pasture. The dEIS should consider approving only herd-trained guard animals because no inadvertent hiker should be confronted by an aggressive guard animal defending the entire pasture through which the hiker may be passing. The dEIS should also consider adding that guard animals aggressively approach hikers must be removed permanently from the pasture.

Lastly, it appears inconsistent for the dEIS on page 49 to allow dogs to haze wildlife to protect livestock, but on page 63 to prohibit dogs from hazing elk to protect livestock. Studies show the utility of dogs for this purpose. The dEIS should consider whether properly trained dogs under the management of trained on-site PRNS staff could assist in the effort to reduce elk impact.



## BMPs: Compost

We suggest the dEIS consider amending pg. 126 (underlined below) to read: "manure, compost and fertilizer spreading increases soil nutrients, which increases forage species production but may have adverse impacts on native grassland plant species." We also suggest that the dEIS consider amending pg. 35 to read: "The Range subzone is identified as lands where grazing would be authorized, but more intensive activities would not be allowed because of the documented presence of sensitive resources, including native grassland species, rare plants, wetlands, riparian/stream/pond habitats, forested areas, and critical habitat..."

The spreading of compost on dairy pasture subzone ("where no sensitive resources are known to occur"), is both environmentally and agriculturally superior to spreading slurry, but this comparative benefit does not extend to rangelands. The dEIS correctly concludes that spreading compost on rangeland "may have adverse impacts on native grassland plant species." But short-term species composition studies funded and promoted by compost advocates show little impact on native species, whereas species composition trends require long term analysis. As the California Native Plant Society 9/28/15 letter (10) noted: "critical questions must still be answered before Californians can be assured that the addition of compost will not adversely alter native species composition and structure of grassland habitats where the practice is applied." Further native grasses sequester far more carbon than the annuals(11). Thus we suggest the dEIS consider amending pg. 190 ("Carbon Farming") to point out potential risks to native species and their carbon sequestration from application of compost to previously unfertilized rangeland.

Not only does the dEIS (pg. 190) fail to point out the potential environmental risk of reduced native species due to the application of compost to rangeland but it also fails to point out the potential greenhouse gas risk from increased forage species due to application of compost to rangeland. Studies funded and promoted by compost advocates (dEIS pg. 180 footnote) show increased carbon sequestration in the soil, but fail to account for the substantially greater GHS impacts of the increased enteric emissions in the atmosphere from the additional cattle able to be sustained on the land by the "increases [in]forage species."

Instead, these studies claim that increased forage does not increase cattle numbers and only reduces the need for supplemental forage. That claim is likely true for dairy operations, where nitrogen from compost simply replaces nitrogen from slurry. But when compost is applied to previously unfertilized rangeland in beef operations (emphasis ours) "spreading the fertilizer over his land will eventually result in more forage, more beef and more profit." More beef creates more enteric methane, whose GHS impact is far greater than that of carbon.(12)

Further, the benefit of carbon sequestration in the soil plateaus, but the greater GHS impacting methane emitted into the atmosphere by "more beef" continues indefinitely. Analysis by SOS indicate that the GHG benefit of carbon sequestered in the soil (by more compost) is surpassed within a few years by the more than offsetting impact of enteric methane (by more beef). Thus, the applying compost to rangelands not only risks impacts to native species but it increases (rather than decreases) greenhouse gas. Compost application to rangeland is thus an environmental expense that is coincidentally an economic benefit to the PRNS rancher who owns a composting facility and advocates spreading his product throughout PRNS rangeland.

## ALTERNATIVE B: SUCCESSION

SOS supports the GMPA's draft Succession Policy (Policy) as consistent with long-standing Congressional intent, but the dEIS should consider making it clearer that under all circumstances when a ranch closes, the NPS will first determine whether it is still appropriate to maintain the lease/permit area in agriculture and if so to what extent and under what conditions. This is the same type of determination made for D Ranch and which resulted in some of the ranch (the steepest parts) being taken out of grazing for resource protection and the remaining (flat) parts being divided between nearby existing ranchers.

Thus, the continuation of the exact same prior grazing regime on a closed ranch newly offered to an existing PRNS rancher has not been and should not be automatic. Such closed ranches could be used to offset elk impacts, or to swap less environmentally valuable portions of that closed ranch with more environmentally valuable

portions of an existing PRNS, or to spread existing AUs, or for short-term commercial grazing as a placeholder, or to experiment with prescribed grazing. The NPS should retain full discretion on these closed ranches without creating any false expectations of how they "should" be used, Thus the dEIS should consider making this important initial consideration about closed ranches clearer by transferring language now in Succession paragraph 2 to instead be in paragraph 1.

Further, the dEIS should consider that same offer proposed to be first extended to PRNS ranch lessees to take over the operation of a closed ranch, should (if no takers among lessees) then be offered to PRNS ranch workers. We point out that many of the PRNS ranch workers have a longer history working on PRNS ranches than younger lessees. Further, many current PRNS ranch lessees are themselves descendants of former tenant farmers who owned neither the land or the cows on what is now PRNS (Livingston: Ranching on the Point Reyes Peninsula). Before the NPS seeks RFPs, the NPS should consider offers from PRNS ranch workers. Per above suggestions, see underline strikeout below.

The NPS would use the following process to maintain active ranch operations within the Ranchland Zone in a manner that supports park natural and cultural resource objectives.

1. In the event that named Lessees: (i) do not wish to enter into a lease/permit; (ii) cannot agree upon an arrangement among named lessees for continued operations under a new lease/permit, (iii) have not consistently met performance standards for the agricultural operation and other named Lessees are not willing to take on responsibility for improved operations: and NPS determines that it is appropriate to maintain the lease/permit area in agriculture (and if so, to what extent and under what conditions), the NPS would consider proposals from other leaseholders operating in the Ranchland Zone to continue ranch operations. In evaluating other park leaseholders, the NPS would assess proposed operations for consistency with the activities authorized as part of the final EIS and Record of Decision and past performance based on adherence to lease/permits and Ranch Operating Agreements.

2. In the event that no other park leaseholders are interested, and NPS determines that it is appropriate to maintain the lease/permit area in agriculture, the NPS would consider proposals from ranch workers on PRNS ranches to identify a new operator. In evaluating PRNS ranch workers, the NPS would assess work history on PRNS ranches and the criteria for review would be identified at that time.

3. In the event that no park leaseholder or PRNS ranch workers are interested, the NPS would pursue issuance of a request for proposals (RFP) to identify a new operator. The RFP process would be conducted consistent with NPS policy and regulations, and the criteria for review would be identified at that time.

The dEIS should also consider making clear that rancher operating under Reservations of Use and Occupancy (RUOs) will be offered leases (when their RUOs expire) subject to the same succession policy offered to current lessees. Conversely, the dEIS should also consider making clear that new operators of closed ranches (portions of which may be re-distributed to existing ranchers or to RFP awardees) do not qualify for the dEIS proposed on-going succession policy and such closed ranches will instead be managed on a case-by-case basis under conditions and terms wholly determined by the NPS.

#### ALTERNATIVE B: Lease Template

The dEIS should consider whether Agricultural Leases and associated documents should be a public document posted on the PRNS website with appropriate and necessary redactions. To that end, for example, the Lease Template paragraphs could be amended as follows (See underline strikeout below).

4.3 The "Ranch Operating Agreement (ROA)" shall be a public document posted on the PRNS website with appropriate and necessary redactions.

4.4 Minutes of the Annual meeting shall be a public document posted on the PRNS website with appropriate and necessary redactions.

The dEIS should also consider whether Agricultural Leases should include language to make lease conditions (including recommendations from Pacific West Region's Public Health Consultant) easier to monitor and enforce and to insure that diversification income is accessory to, not a replacement of, ranch income. To that end, for example, the Lease Template paragraph could be amended as follows.

7. ... Lessee shall provide documentation to NPS upon request demonstrating that Lessee has an ownership

interest in all cattle on the Premises. Lessees with diversification operations must provide annual sales information for both their beef/dairy operations and their diversification operations to NPS. Lessee is not permitted to allow use of the Premises for any cattle in which Lessee does not have an ownership interest. Cattle must be branded in a way that allows easy visual identification and Lessee shall include in this document (and thus make public) a copy or description of Lessee's brand.

9. Except as authorized in the ROA, Lessee shall not engage in any Diversification Activities on the Premises, including in the Pasture and Ranch Core subzones. If Lessee seeks to undertake any Diversification Activities, Lessee shall follow the approval process set forth in Article 21. Lessee shall provide documentation to NPS upon request demonstrating that Lessee has an ownership interest in any other diversification activity authorized under the ROA. Lessee is not permitted to allow use of the Premises for any activity in which Lessee does not have an ownership interest.

14.1. Wildlife management, including management of elk, removal of non-native species, and the restoration of native species, is the responsibility of the NPS. Lessee shall not engage in any activities that impact wildlife or that support or increase populations of non-native or invasive plant or animal species. Except as specifically authorized in the ROA.

18.3. If NPS authorizes Lessee to provide ranch worker housing, Lessee shall ensure, at its sole cost and expense, that such housing is safe, sanitary, and decent and that the physical condition of such housing complies with all Applicable Laws, including building codes. Lessee shall provide a copy to NPS of all health and safety inspections/reports received by Lessee, which, together with all such reports received by NPS, shall be a public document posted on the PRNS website with appropriate and necessary redactions. Lessee is also responsible for keeping exterior areas around such housing units clean and sightly.

19.4. Lessee shall maintain all water systems from the main line including the water meter, well pump and controls to the building(s) and outlying water spigots, water troughs, faucets, and stand pipes on the Premises. Lessee shall maintain water systems to show no evidence of leaks. Lessee shall also take all reasonable measures to conserve water through the use of water-restricting/low flow devices and low volume flush toilets. Lessee shall replace or repair any damage or loss to the water system within the Premises. Lessee shall prohibit livestock access within 100 feet of a water source used for human consumption. Lessee shall perform a Microscopic Particulate Analysis (MAP) on all water sources used for human consumption to determine if the source is under the direct influence of surface water and if so, will filter the water.

The dEIS should also consider whether Agricultural Leases should include language to clarify maintenance responsibilities on ranch roads newly proposed for additional public access and recreational purposes. To that end, for example, the Lease Template paragraph could be amended as follows.

19.11. Lessee shall maintain ranch service roads on the Premises in a serviceable and safe condition regardless of whether the service road is also designated for public access. No new roads or truck trails shall be established without prior written permission of the Lessor. Mitigation measures and other conditions related to ranch service road maintenance activities approved by NPS will be included in the ROA.

## ALTERNATIVE B: PUBLIC USE AND ENJOYMENT

### PUBLIC USE AND ENJOYMENT: Vacant Structures

In order to better support ranching and ranch worker housing in PRNS, and to provide affordable housing for those in the local community displaced as long term residents by use of local housing as Airbnb's for park visitors, the dEIS (pg. 33) should consider altering the decision making sequence as follows (per underlined additions and ~~strikeout~~ deleted sections: "When a structure, structures or an entire ranch complex becomes vacant, NPS would use the following process to determine its future use:

- NPS would first consider if the structure or complex could be used for NPS operational uses, such as housing, operations, visitor services, or partner use
- If NPS does not have a use for the structure or complex, NPS will offer the structure or complex to both PRNS ranchers and PRNS ranch workers for ranch operations, rancher housing, or ranch worker housing. A vacant

complex taken over by a PRNS rancher or PRNS ranch worker does not create a diversification opportunity in that complex or create any grazing opportunity in the surrounding ranchland, or any succession opportunity.

- If a PRNS rancher or PRNS ranch worker does not have a use for the complex or structure, NPS will issue a request for proposals, seeking proposals for adaptive reuse in ways compatible with park purpose and desired conditions, including use by a non-profit to provide affordable housing. Stabilization techniques such as mothballing structures may be implemented to arrest deterioration.
- If ultimately no use can be found for the complex or structure, NPS would consider demolition of the complex or structures after consultation with the SHPO.

The dEIS pg. 39 notes: "Under alternative B, ranchers would continue to use residential units, barns, and other structures. Occupancy of residential units in the building complex would be limited to immediate family members of lease/permit holders, employees of that ranch ( and their immediate family), and, with NPS approval, employees of other park ranches. However, we urge that the dEIS should instead consider whether use of residential structures in a ranch complex should be limited to that reasonably needed for ranch operation and intergenerational transfer.

We note that ranch families can be large and without this reasonable limitation, for example, a ranch owner with 4 married adult children each of whom has 4 married adult children could seek to occupy 21 residences, which would result in many members of that family commuting off-ranch to jobs while at the same time occupying on-ranch space that could house workers at PRNS ranches who would then have to commute from off-ranch sites to work on the ranch. Thus without this reasonable limitation, what the dEIS intends to be a ranch complex could turn instead into de facto family compound.

#### PUBLIC USE AND ENJOYMENT: Visitor Access

According to "Ranching on the Point Reyes Peninsula" (pg. 48) the H Ranch Road is the historic "Original Road from Olema to Point Reyes." We also request that the dEIS consider a walkover or "fat-man" gate at the current vehicle gate on the road to H Ranch because this gate prevents hikers from experiencing this historic roadway. The dEIS should also consider officially connecting this roadway to the trail to Muddy Hollow and including it on official trail maps. We know of no other historic roadway in PRNS that is similarly blocked to hiker access. Appendix E already plans to "consider alignments around the core of Home Ranch" and these could be designed to protect the privacy of occupants and use of the ranch buildings while still allowing the experience of the historic roadway.

Appendix E also suggests: Create a new trail alignment that highlights Drakes Estero. To that end, the dEIS should consider a trail to and interpretation of the site of the historic town of Point Reyes and its adjacent (former) wharf on Schooner Bay.

The dEIS should also consider adding new trails only when funding is also available for the decommissioning of surplus trails and roads that do not meet sustainability standards. For example, Appendix E suggests new trails connecting the Bolinas Ridge Trail with Highway One, but the November 2003 Trail Inventory and Condition Assessment also recommends decommissioning existing trails (McCurdy) connecting the Bolinas Ridge Trail to Highway One.

In light of the new Interior Department directive to allow electric bikes with speed up to 28 mph on all roads/trails now authorized for bicycles and in light of the dEIS proposal to newly open certain ranch roads to bicycles, the dEIS should consider prohibiting bicycle use of former ranch roads that have devolved into de-facto single track trails (e.g. Abbotts Lagoon, Kehoe, Chimney Rock and Estero Trails). The dEIS should also consider metering out such new bicycle prohibitions commensurate with ranch roads newly opened to bicycles so that there will be no short-term diminution of bicycle opportunities and as more ranch roads are open, a possible long-term increase in bicycle opportunities.

In light of the continuing inability of PRNS to manage both official and un-official boat-in sites on its parklands along the east and west shores of Tomales Bay, the dEIS should consider whether PRNS should demonstrate effective management of these official and un-official existing boat-in sites before adding any new boat-in sites.

TYPOS:

Appendix L

8.1.4 (coho - species) text says "likely to adversely impact" but Table 9.1 (line 1 col 4) also says "NLAA" and col 5 also says "unlikely."

8.2.4 (steelhead - species) says "likely to adversely impact" and Table 9.1 (line 3 col 4) also says "LAA" but col 5 says "unlikely" (same as line 1).

Tables 7-2 and 7-3: Last columns refer to NMFS, but footnote c) refers to USFWS.

Lease Template

18.3: "Lessee is also responsible for keeping exterior areas around such housing units clean and sightly"

END OF SAVE OUR SEASHORE PRNS GMPA DEIS COMMENTS

(1)

MARKET FACILITATION \$11,646  
PRICE LOSS COVERAGE \$2,830  
DIRECT PAYMENTS \$1,430  
PRODUCTION FLEXIBILITY \$2,131  
MARKET LOSS COMMODITY \$1088  
MAREKT LOSS NON-COMMODITY \$34,512  
LOAN DEFICIENCY \$7,026  
MILK INCOME LOSS \$184,348  
MILK INCOME LOSS TRASITIONAL \$18,949  
DIARY ECONOMIC LOSS \$20,441  
MARGIN PROTECTION \$28,106  
LIVESTOCK INDEMNITY \$18,352  
MISC SUBSIDIES \$204  
NON INSURED DISASTER \$67,705  
DAIRY DISASTER \$1,785  
LIVESTOCK FEED DISATER \$9,910  
LIVESTOCK FORAGE DISASTER \$49,574  
LIVESTOCK COMPENSATION \$34,257  
TOTAL \$494,294

(2)

Gerald Spaletta  
James Spaletta Sr  
Henry Spaletta  
Anthony C Spaletta  
Charles W Spaletta

Darlene Spaletta  
Ernest Spaletta PRNS Rancher  
Elaine Spaletta  
Lisa Spaletta  
Paul E Spaletta  
James Spaletta Sr

(3) The dEIS (pg. 92) states: "Only one ranch runs a poultry operation in the planning area. It was assumed that this operation uses Rhode Island Red chickens that can produce up to 300 eggs per year and that the operation has 2,000 laying hens. It was also assumed that one dozen eggs sell for \$0.87 (2017\$) (USDA-NASS 2018a). Based on these statistics, this operation can raise \$43,300 per year from egg production. The dEIS egg statistics are suspect. The \$.87 / dozen (2017\$) is a national statistic for egg dozens that overwhelmingly represents producer-level sales to mass market distributors of eggs from caged hens on factory farms. National statistics on egg sales to mass-market distributors are inapplicable to egg PRNS producers who often bypass the traditional 33% distributor markup and sell directly to retailers or

further avoid the traditional 50% retail markup and sell directly to consumers ... both resulting in higher sales dollars per dozen than the national statistic. Further still, national statistics on egg sales based on factory farms are inapplicable to California eggs since passage of Prop 2, which increased egg prices in California. Lastly, national statistics on egg sales based on factory farms are inapplicable to PRNS-produced eggs because PRNS producers, by permit, would (and currently do) produce only pasture-raised eggs, which sell at a much higher price comparable to prices for organic eggs.

There is no ideal egg price index, but we believe that the best available price index is not the dEIS choice of the national statistic for sales to mass market distributors of eggs from caged hens on factory farms (\$.87 per dozen), but rather data from USDA-NASS-2016 California Organic that shows the California value at \$2.38 /dozen. The appropriateness of our suggested valuation (and the inappropriateness of the dEIS valuation) can also be inferred by working backwards from the local retail price of \$5.99 / dozen (less industry standard markups of 33% at wholesale and 50% at retail = \$3.00 / dozen at producer level). The dEIS also assumes 100% of eggs are marketable, which is unrealistic. Using the organic price data and a 10% loss factor, the existing PRNS poultry operation of 2000 layers can raise \$107,100 per year from egg production (not \$43,300 per the dEIS).

The dEIS (pg. 92) broiler data is similarly suspect when "it was assumed that this operation sells 900 broiler hens per year based on park permit data and that these broilers are sold for \$3.39 (2017\$) per head (USDA-NASS 2018b). But the dEIS fails to understand that the 900 broiler hens allowed in the permit are raised to market weight once every 6 to 8 weeks, so the nine months on pasture results in sales of  $900 \times 6 = 5,400$  broilers, not 900. Further, for all the same reasons cited above for egg valuation, we believe the best available data is from the USDA 2016 California Organic report, which shows broiler sales at \$7.44 per head, not the dEIS assumption of \$3.39 per head. Using this organic data and a 10% mortality factor, the existing PRNS poultry operation of 900 broilers layers can raise \$36,158 per year from broiler sales (not \$3,051 per the dEIS).

The dEIS, using inapplicable USDA data, then concludes, "One commercial chicken operation supported 2,000 laying hens and 900 broilers, which were assumed to bring in approximately \$50,000 annually in egg and meat poultry sales." The more realistic figure, based on USDA California organic data and accurate broiler data, for the current operation of 2900 chickens would be almost three times higher at \$143,258.

(4) As an extreme example, 2.5 diversification acres collecting fog condensate and growing rows of gourmet mushrooms could be a \$16 million dollar business, which would render the income from the associated ranch as insignificant and which would equal the combined income from all the ranches and dairies in the planning area. A more likely example (using our above assumptions) would be a PRNS ranch with 500 laying chickens generating \$26,775 in chicken income. Using the dEIS figures for the planning area of \$1.6M in beef income and 2400 head of beef (" \$667 /head), then income from 500 chickens (\$26,775) would exceed the beef income on smaller PRNS ranches (under 40 AU) and represent an offset for elk impacts of 100% of ranch income, which is obviously excessive.

(5) Multiplying the dEIS estimate of total PRNS ranching income of \$16M times the suggested diversification limit of 10%, would generate total diversification income of \$1.6M and at the suggest crop share rent of 25%. net rent to PRNS of \$400,000. This is comparable to current rent paid to PRNS from ranching operations, which we estimate to be roughly (dairies are different) the DEIS PRNS cattle count of  $5715 \times \sim \$84/m$  per AU =  $\sim \$480,060$ .

(6) The CDFW Plan notes: "Where it is (or may become) necessary to alleviate property damage and public health/safety problems ... regulated hunting is the recommended primary method of population control ... approximately 330 elk [hunting permit] tags per year [are issued]."

(7) In the 1998 Elk Environmental Assessment (EA), states: "The Park Service has a responsibility to be a good neighbor to adjacent and nearby landowners .... any depredations by elk on fences, crops or other property would require mitigation .... the Seashore will be ready to recapture or destroy animals should these situations arise."

(8) The January 2015 Coastal Dune Restoration Environmental Assessment (EA) assessed the elimination of habitat for (aka managing for the elimination of) thousands of native deer mice, which, like Tule elk, are native but neither threatened nor endangered. And like the GMPA dEIS conclusion that managing Tule elk to a 120 level in

the Drakes Beach herd will not significantly impact the statewide Tule elk population, the Dune EA concluded that destroying thousands of native deer mice in the Dune Restoration would have "moderate adverse impacts ... [but] ... park-wide adverse impacts would be no more than negligible." This is an example of a NPS balancing act this time between an endangered plant (Tidestrom's lupine) and native wildlife.

(9) In 2019, when elephant seals took over Drakes Beach, a popular recreational site, PRNS decided to allow pupping seals to use the beach in the winter when recreational use is low, but to haze molting seals off the beach in the summer, when recreational use is high. This is one of many typical NPS balancing acts, this time between wildlife resources and recreational resources.

(10) CNPS 9/28/15 letter to CA Assembly: "one of your witnesses may have made misleading statements giving the impression that they were representing or reflecting the views of the California Native Plant Society (CNPS). The witness was Mr. John Wick, of the Marin Carbon Project ... One of Mr. Wick's opening comments was to tell the Committee that he was a member of CNPS; indeed he was a member, he had joined on August 17th, the previous day. To be fair to Mr. Wick, he did not say he represented CNPS, but it is hard not to conclude that was the intended message. I want to be clear in assuring you that Mr. Wick did not and does not speak for CNPS, and CNPS does not entirely embrace what Mr. Wick is advocating regarding compost-onto grasslands .... The practice of applying compost to grasslands is a complex subject that deserves scrutiny ... we see potential risk in applying compost to grasslands. We need to better understand whether the addition of compost will adversely alter native species and species diversity. Unintentionally altering grassland species ...

(11) Invasion of non-native grasses causes a drop in soil carbon storage in California grasslands Koteen, Baldocchi, Harte

(12) <https://ecometrica.com/assets/GHGs-CO2-CO2e-and-Carbon-What-Do-These-Mean-v2.1.pdf>

#7570

Name: Crawford, Kyle

Correspondence: Regarding Point Reyes National Seashore General Plan.

My family members are frequent visitors to Pt. Reyes and Tomales Bay. Our greatest Joy is to witness the Elk of Pt Reyes and their magnificent herd. We understand that resource protection in the area must take precedence over commercial businesses and actions. The Tule Elk are only at this National Park. They have been successfully managed by the Park since their resettlement. The loss of ½ tule Tomales Pt herd resulted from prioritizing cattle grazing over their free roaming. Ranches on Pt. Reyes have enjoyed subsidies from the federal government - grazing fees below market, tax funded improvements. It is critical that they accommodate the Elk and other wildlife, and Not be expanded at the expense of the National Park wildlife needs.

Or last visit to Pt Reyes 9/10/19 found a group of cattle on South Beach. They had to be transported back to pastures. The cattle are not consistent with Park values and there are inadequate buffer zones for plants and wildlife. Please assure that the National Park serves the interests of the larger public and Not the few commercial interests that benefit from their location no Park property. Very respectfully,

Louis Chiatorich/Laurence Crawford

Jean Crawford

#7571

Name: Huffman, Jared

Correspondence: September 23, 2019

Cicely Muldoon, Superintendent Point Reyes National Seashore  
1 Bear Valley Rd.  
Point Reyes Station, CA 94956

Dear Superintendent Muldoon:

Thank you for this opportunity to comment on the Draft Environmental Impact Statement (DEIS) for the General Management Plan Amendment (GMPA) for Point Reyes National Seashore (PRNS) and North District of the Golden Gate National Recreation Area (GGNRA) (collectively Seashore). The GMPA process will complete a necessary, important and overdue step in the issuance of 20-year lease/permits by providing a long-term management plan and environmental standards by which these ranches will operate. That is why, even though there are many commendable parts of the DEIS, I feel strongly that certain modifications to some elements of the DEIS and the preferred alternative are necessary.

Preservation of Ranching: It is good to see the preferred alternative honors the directive that then-Interior Secretary Ken Salazar issued to the Park Service in 2012 to pursue 20-year lease/permits for the historic dairy and beef ranches in the pastoral zone (which was then expanded by the park service to include the planning area in the GMPA). As he wrote in his November 29, 2012, decision memorandum on the Point Reyes National Seashore and Drakes Bay Oyster Company:

"Finally, the Department of the Interior and the NPS support the continued presence of dairy and beef ranching operations in Point Reyes' pastoral zone. I recognize that ranching has a long and important history on the Point Reyes peninsula, which began after centuries old Coast Miwok traditions were replaced by Spanish mission culture at the beginning of the 19th century. Long-term preservation of ranching was a central concern of local interests and members of Congress as they considered legislation to establish the Point Reyes National Seashore in the late 1950s and early 1960s. In establishing the pastoral zone (Point Reyes enabling legislation PL 87-657, section 4) Congress limited the Government's power of eminent domain and recognized 'the value to the Government and the public of continuation of ranching activities, as presently practiced, in preserving the beauty of the area.' (House Report No. 1628 at pages 2503-04). Congress amended the Point Reyes enabling legislation in 1978 to authorize the NPS to lease agricultural property that had been used for ranching or dairying purposes. (Section 318, Public Law 95-625, 92 Stat. 3487, 1978). The House Report explained that the "use of agricultural lease-backs is encouraged to maintain this compatible activity, and the Secretary is encouraged to utilize this authority to the fullest extent possible ." (House Report 95-1165, page 344).

Accordingly, I direct that the Superintendent work with the operators of the cattle and dairy ranches within the pastoral zone to reaffirm my intention that consistent with applicable laws and planning processes, recognition of the role of ranching be maintained and to pursue extending permits to 20-year terms for the dairy and cattle ranches within that pastoral zone. In addition, the values of multi-generational ranching and farming at Point Reyes should be fully considered in future planning efforts. These 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 the Point Reyes' superlative natural and cultural resources."

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As this makes clear, and as my scoping comment letter (attached) and recent congressional actions reaffirm, Congress' intent on this topic is unambiguous: the historic multigenerational working dairies and cattle ranches contribute to the Seashore's unique historic, cultural, scenic, and natural values, which NPS is required to preserve. This was reinforced in the bipartisan approval of H.R. 6687 by the House in the 115th Congress, and most recently by policy language appended to the bipartisan Consolidated Appropriations Act for 2019:

"The Conferees note that multi-generational ranching and dairying is important both ecologically and economically for the Point Reyes National Seashore and the surrounding community. These historic activities are also fully consistent with Congress's intent for the management of Point Reyes National Seashore. The Conferees



are aware that the Service is conducting a public process to comply with a multi-party settlement agreement that includes the preparation of an environmental impact statement to study the effects of dairying and ranching on the park. The Conferees strongly support the inclusion of alternatives that continue ranching and dairying, including the Service's Initial Proposal to allow existing ranch families to continue ranching and dairying operations under agricultural lease/permits with 20-year terms, and expect the Service to make every effort to finalize a General Management Plan Amendment that continues these historic activities." (p. 324 of the joint explanatory statement to Public Law No: 116- 6)

The loss of ranching at PRNS would end the valued cultural legacy and working landscapes whose preservation was one of the fundamental reasons the Seashore was created. The iconic scenic view of pastures in the Seashore would not exist without being grazed by cattle, or managed with fire as the Coast Miwok residents did prior to the ranches. The rich visual mosaic of pasture, rangeland, scrub, forest, and varied land forms that generations of visitors have treasured would be greatly diminished. Moreover, loss of the Seashore's historic multi-generational ranching culture would have significant negative consequences which the DEIS does not fully account for. The DEIS and the related foundation document should be clarified to reflect these considerations.

Elk Management: This is not a zero-sum game where park managers must choose between elk and Ranching. Successful coexistence between thriving elk herds and the cultural, historic and economic values of continued ranching is possible; but it requires a meaningful partnership between NPS and the ranchers, something I believe both sides desire. However, the starting point for that successful partnership requires an honest recognition of the ways in which poorly managed elk herds could severely undermine the ability of several ranches and dairies to continue operating.

Contrary to the characterizations of some anti-ranching stakeholders, the preferred alternative envisions more elk in PRNS going forward, not less. Elk were first reintroduced to PRNS in Pierce Point and later a Free Range herd was established for the Philip Burton Wilderness area, which is now being called the Limantour herd. The preferred alternative would embrace the ongoing presence of a third herd, an additional 120 elk that in recent years have taken up residence in the Drakes Beach area in the middle of active ranch land. This smallest and newest of the herds was not contemplated under the 1998 Elk Management Plan, and exists only because NPS allowed strays from the free-range Limantour herd to become established in the Drakes Beach area. My preference from the start of this elk management debate was to continue a management plan premised on the two planned-for herds rather than accept a new unmanaged herd on ranching land. I advocated for the aggressive use of sterilization and relocation to prevent the Drakes Beach elk from becoming established as a new herd because of the inevitable conflicts it would present with several dairies and ranches in that area. Thus, I argued in earlier comment letters that Tule elk belong in the preserve on Tamales Point and in the Philip Burton Wilderness, but not in the middle of working ranches.

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To put this in context, more than 70% of the planning area in the DEIS is wilderness; less than 30% of the remaining non-wilderness land in PRNS is occupied by working ranches. We can value and protect both our elk and our ranching heritage by managing for separation in places where there are conflicts. Yet the Park Service consistently minimizes the negative impacts on ranch operations posed by elk, especially in the Drakes Beach area. Ranchers have documented damaged fences, injured cattle, consumption of carefully cultivated organic pasture meant for dairy cows and cattle, as well as the highly unnatural spectacle of elk and cows eating right next to each other from cattle feeding troughs (not exactly the free-range elk experience NPS' original elk management plan contemplated).

The reality is that if the Drakes Beach herd continues to grow in size, and certainly without a major new investment in protective fencing and other separation measures, this herd will crowd out the viability of several historic ranches in the area Congress always intended to be a pastoral zone where our ranching heritage would be preserved. This is an unacceptable outcome.

Deeper analysis is needed to develop a realistic plan for effective management of elk where there are conflicts with ranching operations. At the very least, if NPS insists on accepting the new Drakes Beach herd, there must be much better safeguards to prevent untenable conflicts. That starts with managing to a smaller sized herd. All the elk in PRNS share the same genetics, making concerns about maintaining a genetically viable herd unconvincing. Since there are no natural predators in the Seashore, the only way to keep this new Drakes Beach herd from getting too big is for NPS to actively manage it. Toward that end, NPS should give further consideration to the following strategies:

- Fencing: NPS should work with the ranchers to identify effective fencing along the Limantour wilderness border and fencing along Drakes Beach Road to protect ranches. Wildlife friendly fencing that is also effective for elk needs further study, and while it may be more expensive up front, it might cost less than constantly replacing substandard fencing. NPS should collaborate more with affected ranchers on specific fencing to keep elk off the working ranches. And, NPS should share in the cost of this fencing.
- Relocation: I understand the concerns about culling, and would recommend that NPS more seriously consider relocation as an alternative. Removing or reducing the Drakes Beach herd through relocation should not be abandoned.
  - o The 2018 California State Elk Conservation and Elk Management Plan notes, "Tribes remain interested in the re-introduction of elk to tribal lands within the historical range of elk. The Department will work with Tribes interested in establishing elk and those Tribes whose aboriginal territory may represent a source of elk for translocation." The Kashia Tribe has expressed interest in introducing the PRNS Tule elk on tribal land along the Sonoma coast, in areas where there are no livestock. This is consistent with the State Elk Conservation and Management Plan and should be more fully explored, but the Park Service has dismissed these options without meaningful consideration. Farther north in my congressional district, Roosevelt elk, which are bigger than Tule elk, are being relocated to tribal land owned by Blue Creek Rancheria right now.
  - o Relocation within PRNS needs further analysis too. The few relocation experiments conducted in 2015 and 2017 are not conclusive and NPS should not close the door on this option. Relocation within the Seashore coupled with active tracking of animals to promote better retention has similarly been dismissed by NPS, but should be more fully considered.

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- NPS needs to significantly fund mitigation costs related to elk damage. Per the 2018 State Elk Management Plan, hunting tags are issued to landowners for resale or use to mitigate elk conflicts-an option that will never be available within PRNS.
- It is good to see a commitment by NPS in the DEIS not to allow any additional new herds to form: "Management of the Limantour herd would be based on the concept of not allowing new herds to establish in the planning area." Based on the experience with the Drakes Beach herd, bordering ranchers will need assurance that this actually means the Limanour herd will not be allowed to make ranch land become part of their permanent habitat.

The GMPA can work for both the Tule elk and the ranchers, but many of my constituents are understandably skeptical that NPS will undertake the specific commitments and follow-through necessity for that to happen, especially considering the inattention that allowed the Drakes Beach herd to establish in the first place.

Diversification. The preferred alternative lays out zones for a variety of historical diversification activities, which makes sense for management guidelines. Parts of the DEIS hint at flexibility while other sections set firm limits on types of activities and where they will be allowed to occur.

Environmental benefits should be given greater weight than a zoning requirement where feasible. For example, carbon sequestration activities might produce greater benefit when applied across zones, and compost that is not generated on site should not be prohibited for that reason alone. Likewise, there might be places on a particular landscape where diversification works better outside the designated zone. Grazing by subspecies in the range zone should not be ruled out if there are benefits that align with achieving other natural resource objectives outlined in

the DEIS, such as preserving scenic values or fire hazard reduction. Further consideration should also be given to integrated pest management and irrigation in the context of best environmental management practices and preservation of historic cultural resources.

Working with other professionals in this field—including the Marin Resource Conservation District, Marin Carbon Project and USDA Natural Resources Conservation Service—would provide valuable resources when assessing diversification and agricultural operations more broadly. Under the Community Alternative submitted by the Ranchers Association during scoping, an advisory committee was suggested, but it was not included in the DEIS. An advisory committee would be useful for creating carbon farming plans, evaluating environmental impacts, and determining best environmental practices for conservation and diversification management plans.

In closing, I want to thank you for pursuing a thoughtful and open process to update the GMPA. You and your team have worked hard to create a plan to manage and preserve many of the unique characteristics that make Point Reyes National Seashore the iconic place it is today. I appreciate the time and resources you have steadily dedicated to this effort and encourage you to continue to expand and improve on efforts to manage for effective separation of the Tule elk and the ranching and dairying operations in the Seashore, and to fine-tune the diversification elements. This will require additional commitment of resources, and a commitment to working with the ranching families, which I believe will create a plan that is durable and protects the Seashore's values for future generations. I look forward to supporting such an improved plan; it is within reach.

Sincerely,  
Jared Huffman  
Member of Congress

#7572

Name: Baker, Virginia

Correspondence: Please adopt amendment F as originally enacted, phase out all ranching, preserving natural lands, water, and wildlife. (particularly elk over cows) ie the wild habitat, native plants, and education, research, etc.

#7573

Name: Bohn, Dave

Correspondence: Adopt Alternative F. Since the buyout-leaseback contract was signed it has be 57 years. What kind of fraud is this?

#7574

Name: Fehlhaber, Ted

Correspondence: Plan B please Manage the elk. I like the subzone concept. I like the increased access to public lands for all user groups where safe and feasible We would not have the seashore if the ranchers had not agreed years ago Keep the ranches

#7575

Name: Forman, Don

Correspondence: Please go with Alternative F

Cows don't belong here.

#7576

Name: Greenberg, Janis

Correspondence: The Point Reyes National Seashore was a deal between the public and ranchers on the property. The ranchers are now asking to keep what they were paid to give up. In return for cash money, extended time for operations, and tax incentives, the ranchers agreed to vacate the land at the end of the lease period. Now they don't want to. They want to stay and continue making money. And the National Park Service agrees and has drafted an amendment to the PRNS management plan which is being argued. So what does the public lose. The ranching operations pollute the land and the water around it, so the public loses access to clean land and water which was a large part of the deal. The Tule Elk and animals of all sorts lose food, water, and safety. Their lives. Point Reyes National Seashore, land and water, is what gets polluted. The lovely beaches and parks, the hiking trails, Abbott's lagoon. WHAT DOES THE PUBLIC GAIN? Will someone please tell me this? And why does the National Park Service want to do this?

#7577

Name: Bay, Vikki

Correspondence: GMP Amendment, C/O Superintendent Point Reyes National Seashore 1 Bear Valley Road Point Reyes Station, CA 94956 Superintendent of the Point Reyes National Seashore:

I am writing to express my strong opposition to the draft GMP Amendment/EIS.

For the last 40 years my family has enjoyed the wildlife, open space, fresh air, trails and water of the Point Reyes National Seashore (PRNS). We have witnessed first hand the effect that the dairy farms have had not only on the damage to the land but on the water and air qualities of its inlets, bays and surrounding seashore. The 6,000 dairy cattle owned by the 32 ranchers presently living on this public land pollute the groundwater and at the same time emit methane gases which contribute to global warming. Scientific groups like the Center for Biodiversity, have been collecting data for years to document the cattle's role on its degradation of this public land.

A second main issue of the draft GMP Amendment/EIS that is equally disturbing is the plan to "cull" the native tule elk. The use of the word "cull" is disingenuous. The proposed plan is to kill these animals that we have fought so hard to bring back to PRNS mainly to benefit the cattle ranching operations.

A third issue is the granting of 20 year leases to the 32 dairy farmers. This is not a good precedent as this will just prolong the existence of these dairy farms in a National Seashore. The reduction of these dairy farm tenants should be the goal to help ensure the restoration of this unique national treasure to its natural state. The National Park Service is charged with being a steward to the PRNS. Its role is to protect this historic national treasure. For all the aforementioned reasons, I strongly urge each and every one of you not to support this shockingly horrific National Park Service GMP Amendment/EIS.

Sincerely, Vikki V. Bay

#7578

Name: Forman, Donna

Correspondence: Alternative F I think the dairy land use is degrading the national seashore. The animal waste is unhealthy for the environment. I do not agree with any killing of the tule elk. They are not the problem. I understand it is historic area but that does not mean the dairies need to continue polluting the area. The farmers were already paid for their land. It's time to take the national land back and let nature take its course of returning to open space with native plants + animals, especially the elk!! I don't want to have to avoid piles of poop from the cows!

Do not kill the elk!!

#7579

Name: Greene, Robert

Correspondence: Dear Sir: I am writing in response to the Draft EIS for Point Reyes as reported in the SF Chronicle. I am a parks and trails advocate who, lives in San Mateo Co. but has a longstanding interest in Marin Co. matters as a committeeman for the Bay Area Ridge Trail Council and most particularly as a person who loves Point Reyes. I have hiked nearly every trail in the park and canoed the waters of Drakes Estero. That I am not an environmental extremist is witnessed by the fact t" as a retired geologist, I support limited mining and drilling. Also, I came down as hard as I could for the continuance of oyster production in Drakes Estero. I cannot be specific about this, but I recall that less than three years ago a plan was released which called for the very gradual retirement of the leases on the "historic" ranches in the park and the return of these lands to "nature", subject to multi environmental reviews and probably lots of volunteer work by advocates like me to remove fences, etc. This is a step that should be undertaken, despite the long running hassle over the Pierce Point Ranch. Why, then, the sudden reversal of this trend with a plan to allow more commercial uses of the ranches and makes no mention of their retirement? To hit the important points: 1. Culling the elk herd certainly seems justified. This no sense in letting them multiply indefinitely. 2. Allowing sheep, pigs & chickens on the ranches may make little difference provided they are properly confined, and their was""""""t enter the runoff into the sea. However, a whole new problem with predator relationships is created. 3. Allowing the ranchers to convert their barns into inns and their kitchens into restaurants is the worst idea since the Edsel. The capacity to take care of tourists would be minuscule compared to the demand, leading to astronomical prices for the few rooms available, poor maintenance, and demand for building more facilities. 4. Tours of the ranches may be: OK, provided they are run by a responsible organization like MALT. They would give ranching advocates a chance for their say. A related matter that gets little attention - The fact that the main road down the peninsula runs right through the core of some of the ranches, between the houses and barns, particularly the last ranch approaching the turnoff for the elephant seals. Isn't it possible to build bypass roads around some of these? It seems strange to me that this hasn't been done long ago. In sum, the Point Reyes NS is a beautiful place. It is primarily for recreation, not ranching.

#7580

Name: DeBella, Stan

Correspondence: The purpose of the impact Statement is to IMPROVE the existing environment for the presentation of the land and the Native species. Alternative F is the only choice. Cattle are Dairy interests are just that. Interests in money only. They were paid for the land and wish to keep it also. "Having your cake and eat it too!" Point Reyes National Seashore is listed as one of the 10 worst polluted water areas in the state because of cattle run-off. Harbor seals are birthed in cow dung. How can any alternative be concluded?

#7581

Name: Hoffman, Walter

Correspondence: Alternative F is the answer to what should happen in Point Reyes National Park. To allow the elk to increase in population is the best answer to allowing nature to take its course and stabilize habitat for all the critters living here as our neighbors and friends not to mention less destruction to the habitat they rely on. I say more wilderness and no ranching. Wilderness and no ranching is the only answer to the problem of global warming and keeping the habitat intact. Keep it wild for our native plants and animals. Alternative F is what we need for a new uncertain future for our children and everybody who comes after us. More wilderness- no ranching! All wilderness, take down all fencing- let the elk run free. Have our children and us to pull invasive plants and keep native plants for our native animals. I love wilderness- it's the only way- no cows, row cropping, house building, roundup, miracle grow, plus, sheep, goats, horses, lodging, chickens. Lets keep it wild. And to hell with the other crapola.

#7582

Name: Dent, Sidney

Correspondence: August 26, 2019 Cicely Muldoon, Superintendent, Point Reyes National Seashore 1 Bear Valley Road, Point Reyes Station, CA 94956

Re: Killing the tule elk.

I am dismayed that the tule elk are being scapegoated by you and your associates.

When Point Reyes was saved from development, it was to be preserved as an area of natural beauty yet the Park Service has given a pass to the ugly farm buildings, destruction of native plants, and poisoning the land with sprayed on manure. Thousands of cattle have degraded the land not the elk.

Under park management more than 200 elk died unnecessary in the drought. A shameful episode.

Why do you agree to the injustice of killing more of these magnificent creatures? I plan to witness and film the killing.

Thank you,

Sidney Dent

#7583

Name: Elke, Mary

Correspondence: I believe we need to protect our wild spaces at all costs. These wild spaces at Pt. Reyes National Seashore were acquired with tax payer money. The landowners + ranchers were compensated at fair market value and given leases. This was "two bites of the apple." Now they want 3 or 4 more bites. This is not equitable.

The National Park Service should not use its resources to fund private ranch operations. I also oppose the Ranch Core subzone on 180 acres due to all the various activities sanctioned that are not in keeping with activities on park land and would only benefit the 24 ranchers.

The Tule Elk are worthy of preserving + need genetic diversity that can only happen when they can range freely.

#7584

Name: Gaffry, Kerry

Correspondence: I send this letter of the utmost concern for the natural wild lands of Point Reyes Nat. Seashore. While Californians are standing by, there's no way in hell that Nat Park Service will pull this wide spread SHENANIGAN to diblodge by death, the tule elk herd, not one of them. If blood spills from this majestic animal then the GMP team who allows the carnage will have hell and high water to pay. I'll express this symbolically not literally. The maneuvering of policy in the name of ranching interest and profit has no concern for the environmental effect and protection of watershed. The multi-use management strategy has enough non native cow pastures in the park. Enough is enough! The long arms of political interest has no hand for our national treasure, the wild lands we and tule elk call home.

The noble elk We celebrate your accomplishments with humility. Your horns are crowned with success. Powerful forces of spirit live and protect the land you graze and sleep on The challenges of the past are behind you All nations will activate to protect you always

I bless this letter with love

#7585

Name: Hughes, Paul

Correspondence: The preferred alternative by the NPS, Alternative B, would extend the government/taxpayer-subsidized operation of ranching activities on public land at the expense of native animals and plants, and contrary to majority public opinion. The long-term leases that have existed have already benefited the ranchers and should not be extended. There are many alternative locations for transferring their ranching operations that are not within a national park. The existing ranching operations within Pt. Reyes NS are a continual source of controversy and consternation and confusion for park visitors who expect to see natural landscapes. Alternative B does not even appreciably move the park toward natural conditions, as it extends and diversifies ranching. Ranching in the park is a constant source of conversation among park visitors, and as such is BAD PR for the park and the NPS. Alternative F is the best alternative, and should be adopted. Unfortunately, the NPS gives every appearance of having already decided against Alt. F, which hurts the credibility of one of America's best-loved agencies.

#7586

Name: Kroplick, Marilyn

Correspondence: Dear Superintendent Muldoon, California-based international animal protection nonprofit organization In Defense of Animals, with over 250,000 supporters, opposes the National Park Service plan to kill native Tule elk, grow commercial crops, and permit ranchers to add chickens, turkeys, sheep, pigs, and goats to their exploitative operations. As national park land, this property was specifically set aside to protect, restore, and preserve the natural environment including the wild animals who live there. The original intention was to phase out dairy and cattle ranching, not add more crops or animals to increase ranching profits. The proposed plan does not address the damage from grazing, including water-quality degradation and soil erosion. Also, adding new crops will create more conflicts with native wild animals. Please abandon this inhumane and destructive plan. We urge you to restore the Seashore's Pastoral Zone for wild animal habitat and repurpose historic ranch buildings for scientific research, interpretation, and public education.

#7587

Name: Lifton, Sherry

Correspondence: Because the national park exists as a protected area for the public benefit, I request that the park service take action for the public good, as opposed to benefiting the for-profit industry. The cattle and dairy ranches contribute to degradation of the park, clearly visible in the areas where ranching occurs. Ranching in the park has destroyed native plant species while creating the environment for invasive species. Forces that destroy the unique ecosystems at Point Reyes seashore should be removed while efforts to restore and protect the biodiversity and ecosystems that define the beauty of Point Reyes National Seashore should be protected. The Tule Elk, magnificent creatures who inspire droves of tourists to the park, need protection. Therefore, I urge the park service to adopt Alternative F. Please protect the beautiful national seashore. For profit industries that harm the ecosystems and wildlife have no place in a national park.

#7588

Name: Webster, Scheherazade

Correspondence: I support the no ranching alternative because I believe it prioritizes supporting native California ecology and biodiversity. I BELIEVE RANCHING HARMS AND POLLUTES THE ENVIRONMENT. I disagree that the national park should use its resources to fund private ranch operations because their responsibility should be towards supporting + reestablishing native landscapes, flora, and fauna - NOT financially or structurally cushioning private enterprise. Tule elk are free roaming animals. They need genetic diversity to maintain a stable and healthy population into the future. I oppose both the killing + sterilization of the tule elk + any native animal -

esp to protect private ranch/agriculture operations. Indigenous history should be prioritized over that of ranchers and others who have inherited the benefits of colonization. If the nat'l park would like to prioritize history, why not center indigenous peoples and Point Reyes original ecological history? I think it would benefit both people + parks if we were to restore pastoral zones for wildlife habitat, native plant communities, scientific research, and education. Historic Ranch Buildings can be repurposed for research, interpretation, and education.

#7589

Name: N/A, N/A

Correspondence: I support the no ranching alternative for MANY reasons!

Ranching should be phased out- life estates should have ended! - To cull the elk to improve for cattle is anti-ethical to natural resource management. Plus the fencing required will cause unintended impacts in + of themselves

Phase out ranching by native species reintroduction - native species hold soil better etc.

Better management of prehistoric sites, esp. from cattle impacts

Discussion + education by + of coast miwok people

#7590

Name: N/A, N/A

Correspondence: The anti-ranching sign carriers should not be shown inside the auditorium- this is neutral territory. It shows bias. Outside is ok.

#7591

Name: N/A, N/A

Correspondence: Reduce ranching DON'T KILL ELK No goats etc

#7592

Name: Phillips, Stu

Correspondence: Point Reyes National Seashore is supposed to be managed under the Point Reyes Act for "maximum protection, restoration, and preservation of the natural environment." There is no mandate for prioritizing commercial agricultural leases on these public lands. So, there it is, PRNS mission statement is to restore and preserve native animals. Tule Elk, native to the area, need to be free roaming, and live in their native habitat. PRNS wants to adopt Plan B option of shooting up to 15 Elk per year to keep a herd at 120. This is in a National Park Plan EIS the option to be adopted, to eliminate ranching in the PRNS. People want to see the Tule Elk and know they are safe in the National Park. There are currently about 5500 Tule Elk in California (endemic to California, once there were 500K). There are currently 5,250,000 cattle in California on 11,000 ranches. The animals are not rare, and neither are their ranches! The ranches were bought by the American people in the 60's for millions of dollars and leased back for the ranchers lifetime or 25 years. That expired years ago. All the ranchers knew this when they sold their ranches! If Plan B is adopted, this would not be considered a National Park! Maybe just a very poor example of BLM land!

#7593

Name: Reichard, R

Correspondence: Please amend the recommended alternative to exclude any grazing or darying from the ranch land east of the Inverness Ridge that abut to Tomales Bay to minimize runoff into the Bay. This would reduce the



environmental impact of the recommended alternative without reducing the rancher's ability to profit from their leases. Please also consider reducing the term of the new leases to a maximum of 10 years make them non-renewable.

#7594

Name: Rames, Linda

Correspondence: In reviewing our previous letter dated November 13, 2018, we have found that our views have not changed, nor have the views of the National Park Service. It appears that the service has ignored the opinions of any citizens other than the ranchers of the Point Reyes Peninsula and that of Representative Jared Huffman who clearly does not represent many of his constituents. We have enclosed our previous correspondence. Please add the letter to the current comments.

Currently, the ranches in the peninsula are a visual disgrace and certainly do not represent the appearance of a national park. Have any of the decision makers actually visited the area? If anyone has seen the ranches, they are aware that there are fields of mud and piles of cow manure existing above, and draining into, one of the most pristine estuaries in California. For these desolate ranches, the park service has proposed culling the tule elk herd, animals which historically resided in this area, for the dubious benefit of satisfying the ranchers whose leases were supposed to end years ago.

The idea of allowing other types of animals is especially disheartening. From past experience with the West Marin ranchers who are not part of the historic, leased ranches, the park service must be aware that smaller animals such as chickens, goats, and sheep will bring predators. The comment by Ms. Gunn that the ranchers will not be allowed to kill them is ridiculous. Who is going to be there to watch?

We were amused by the idea of tourists coming to stay at these ranches. These are not the pristine farms of New Zealand or South Africa which often cater to visitors. Instead, tourists would be staying in run down ranch houses and barns and would be treated to the noxious odors of cattle and other livestock manure and surrounded by muddy fields and barren land. Unless the park service is willing to front the cash for upgrading the current state of most of the ranches, they would probably not generate much enthusiasm from visitors.

We feel that the park service is heading in the wrong direction and is not really considering this area as a national park. We would like to see the ranching phased out and the park returned to what it once was, a beautiful wildlife refuge. Then, the Point Reyes Peninsula would qualify as a national park. Currently, this is not the case.

Linda & Robert Rames

[includes 2018 correspondence in attachment]

#7595

Name: Takalna, Jonah

Correspondence: For environmental impact, the NPS should consider photographic and cinematic documentation. In particular, the visual images from the documentary film - The Shame of Pt. Reyes, should be included in the final report.

#7596

Name: Walch, Tim

Correspondence: Thank for you taking the time to share alternatives to Pt Reyes National Seashore Management. Since the Ranches were purchased both the use of land and the economics of farming (dairy/ranching) was changed. Given the number of visitors (bikers, hikers, runners, birders, etc) consideration should be given to the economic and social impact of this land. Use has shifted and the phase-in of more public use should be prioritized.

As a taxpayer, my expectation is that the National Park Service maintains parks - certainly in fragile lands like Pt Reyes the re-introduced alt should be given priority over a small number of farms/ranches. Based on the change in environment (literally and figuratively). I support Plan F. Let's let the members drive this decision (people using the land and native animals) is the dollars from dairy/ranching).

#7597

Name: Reichard, Roberto

Correspondence: The preferred alternative is nothing but a continuation and an increase of ranching + dairy farming on Point Reyes, regardless of its impact on the quality of the air and water resources. I continued the use of public lands for the private profit of a few individuals. The preferred alternative also for new uses (pigs, chickens, goats etc) all of which will dilute air and water resources. Agriculture + ranching on Point Reyes National Seashore should be phased out not extended for another 20 years. AGAIN Agriculture + ranching on PRNS should be phased out NOT extended for 20 years. The manure stench on Tomales Bay due to the dairy farms on PRNS is often overpowering + deterred from the public's enjoyment of the bay. The runoff into the bay pollutes it + is impacting many critical species. PLEASE PLEASE PLEASE LETS HAVE ALTERNATIVE F.

#7598

Name: Huey, Patricia

Correspondence: Ranching has no business in a national Park, particularly given the climate change emergency we are undergoing right now. I commented online, but I have some additional comments. -Tule elk are vital for this delicate ecosystem to survive. Pt Reyes is one of the top 25 most biologically diverse areas in California. -In the original plan in 1962, ranching was supposed to be phased out in 25 years. Why hasn't it? -the state's largest outbreak of E. coli came from a Pt Reyes ranch. Is this something to be proud of? -one of your proposals is to allow a retiring rancher to sell his lease to another rancher. Wasn't the original idea to let the land go back to wilderness? Also, does this allow for a monopoly? -how do you plan to address the massive pollution animal agriculture causes? Animal agriculture is a leading cause of climate change. -how do you justify supporting the wishes of 24 (tax sucking) families over the wishes of thousands of wildlife lovers? -the tule elk + other native species are far more important than "cultural history" (particularly one only 160 years! -your concern for history stopped at the native tribes and species. They were better stewards of this land than we are today. All your plans are bad. Get rid of ranching, period.

#7599

Name: Huey, Patricia

Correspondence: This is an addendum to an earlier comment I made. I support plan F because: 1. It is the most environmentally sustainable option. 2. Ranching does not belong in a national park. 3. It respects the original intent of this park- ranching was supposed to be phased out 25 years after the park was started. 4. It will be in the best interests of the elk. The elk are vital for the delicate ecosystem of the park. Cows are not even native to America. 5. Animal agriculture is a leading cause of climate change, it should not be allowed in the park 6. The park will benefit financially with this plan. Ranching provides 2% of the jobs in Point Reyes; tourism provides 2090. Tourism generates far more revenue than ranching. 7. It will respect cultural history if you consider the true history of this park! The native Americans and tule elk were here long before the ranches.

#7600

Name: Kenny, Jennifer

Correspondence: The joint explanatory statement introduced into the congressional record by Rep. Jared Huffman (D. CA) stating that "ranching + dairying is fully consistent with congress's intent for the management of PRNS tied the park service's hands, forcing the park service to recommend an alternative that continue ranching + dairying, despite its negative impact on the environment and the quality of the PRNS air + water. The private for profit use of PRNS by a few ranchers/farmers is incompatible with the park services ethos and mandate. Tomales

Bay is being negatively impacted by the runoff of farm chemicals + manure into the bay. This runoff is acidifying the bay + killing its oyster + mollusks. Alternative F to re-wild PRNS + not kill the elk is the best alternative by far.

#7601

Name: Meral, Gerald

Correspondence: Dear Cicely The Natural Heritage Institute has been involved in land and water management issues in California for more than 30 years. I have personally served as Deputy Director of the California Department of Water Resources, and as Deputy Secretary of the California Natural Resources Agency. I worked with Peter Behr in 1969-1970 to successfully promote the completion of land acquisition for Point Reyes National Seashore. I have worked for many years as a volunteer in the Habitat Restoration program at the Seashore. I have visited various parts of the Seashore more than 1000 times over the past 50 years. This letter provides comments by The Natural Heritage Institute on the Point Reyes National Seashore (PORE) Foundation Document, and the Draft EIS for General Management Plan for Point Reyes National Seashore. These comments will be submitted through <https://parkplanning.nps.gov/poregmpa>. These two documents are inextricably linked, since the values described in the Foundation document must be protected through the proposed action in the EIS. Our comments address the direct and specific impacts on the environment of the funding impacts of the selection of the final alternative course of action. Protection of the values described in the Foundation document cannot be accomplished in a vacuum. Funding is required to protect them, as well as carry out whatever final action is selected pursuant to the EIS. You have provided us with PORE budget figures for the past several years. While some one-time funding is not included, and certain funding has gone in and out of the baseline budget, we converted the baseline budget to constant dollars, as show in the following table: [FIGURE] The baseline budget has dropped 17% in constant dollars since 2015. Presumably the nearly one million dollars spent to prepare the DEIS did not come from the baseline budget, but implementing the final selected action will almost certainly have to come from the baseline budget, which has already been severely cut back. PORE also has a deferred maintenance budget of more than \$100 million. The following chart of deferred maintenance categories was obtained from your office. It is a few years old, and is almost certainly an underestimate. Recent bids for road repairs indicate the underestimate may be substantial. [CHART] The National Park Service budget in constant dollars has increased less than 1% per year over the past decade, just about enough to keep up with inflation, but offering little hope for any NPS unit to receive a permanent substantial increase in operations funding. (page 2 of Congressional Research Service Report <https://fas.org/sgp/crs/misc/R42757.pdf>). The capital outlay deferred maintenance backlog of the National Park Service is nearly \$12 billion (op. cit.). New Congressional legislative proposals (S. 3172, HR 1225) regarding funding focus on reducing this backlog, making increases in ongoing operations and maintenance funding even less likely. (These legislative proposals would provide only \$1 billion per year for six years, leaving a continued large and growing backlog.)

For these reasons, we must ask how much each proposed action would cost, and if it is a cost above what is currently being spent on that action, what PORE program would likely be cut back to pay that incremental cost. We will point out specific impacts on the environment which would result from budget cuts to existing programs since, in the absence of new revenue, the final selected alternative will require shifting money from existing programs to implement the new program. PORE may be tempted to suggest that the Point Reyes National Seashore Association (PRNSA) or other private funders might pay for some of the new costs. PORE should not make that assumption. PRNSA is an important park partner, but has not donated substantial new or additional sums to park operations in the recent past, and should not be counted on as a funder beyond current levels for any new programs. Comments on Foundation document. The document opens with the following statement: The National Park Service (NPS) 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 National Park Service cooperates with partners to extend the benefits of natural and cultural resource conservation and outdoor recreation throughout this country and the world. We suggest this paragraph be revised as follows The National Park Service (NPS) 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. To the extent that these resources and values are impaired by damage, invasive species, diminished air or water quality or other impairments, the National Park Service seeks to reduce or eliminate the impairment through mitigation, remediation, or

restoration. The National Park Service seeks to avoid through its own action and the action of other agencies any further impairment of the natural and cultural resources and values of the national park system. The National Park Service cooperates with partners to extend the benefits of natural and cultural resource conservation and outdoor recreation throughout this country and the world. A subsequent statement is: Respect: We embrace each other's differences so that we may enrich the well-being of everyone. Since corporations have been found to be "persons" by the Supreme Court, we suggest that "everyone" be replaced by "the people of the United States and visitors from other countries". In general, it is a major omission that the Foundation document ignores the great need to restore the biological, cultural and historical values of the Seashore. Preservation is emphasized, and restoration is ignored. This should be corrected. Comments on the DEIS. Selection of a final action must be guided by budget constraints. There is no reason to think budgets will increase over time, given recent history. This means that actions should be selected which minimize annual expenditures, and which do not rely on large capital outlay for which there is no expected revenue source. Although the Park Service was able to remediate Drake's Estero with one time funds from headquarters, coupled with donations from private foundations, these types of extraordinary funds will not be available for ongoing routine implementation of the selected action. A final action should be selected based on the following criteria: 1) preservation and enhancement of the natural values outlined in the Foundation Document. 2) minimization of capital outlay and annual implementation costs

For each possible action listed below, please answer the following questions: What would implementing this action cost per year? What one time capital costs would be incurred to implement this action? Assuming no increase in constant dollars in the PORE budget, if the cost of implementing the action is higher than what is currently being spent on that action, what existing program or programs would be cut in order to pay for the new action? What would be the environmental impact of these program reductions? It is not adequate for the Park Service to describe only the environmental impacts of the proposed actions, if implementing these actions is likely to cause reductions in other programs, resulting in other environmental impacts. While the Park Service may not know today exactly what programs will be cut to implement the selected action, it would be appropriate in the FEIS to describe the environmental impact of cuts to the budgets of all major program categories that affect the environment. We believe that the following specific and important environmental impacts will result from the implementation of any new programs which are to be implemented as a result of selection of each of the alternatives. Once PORE provides the data on the cost of implementing each alternative, we will be able quantify the specific environmental impacts of budget cuts on existing programs, and which new programs will not be implemented.

Deferred maintenance. PORE has a deferred maintenance backlog of more than \$100 million (see above). The EIS must describe the environmental impact of not addressing this backlog, and of having the backlog increase. Here are some examples of not addressing the deferred maintenance backlog, and of allowing the backlog to increase. We refer to the categories of deferred maintenance listed above: Housing. A number of park employees live in park housing. If this housing is allowed to continue to deteriorate, the housing units will become uninhabitable. This has already happened to some extent. The environmental impact of uninhabited housing is substantial. For example, the park maintains two houses on Mount Vision Road. If employees could no longer live there, there would be less enforcement of park rules in that important corridor. This could lead to people bringing dogs on to the road, which is not allowed. The result would be harassment of wildlife, dog waste, and possible introduction of canid disease to the coyote population.

Abandoned houses become infested with rodents, introducing disease and fire risk. Blighted houses detract from the park visitor experience. There are already far too many abandoned buildings along Gunn Road and Randall Trail, as well as many ranches in the pastoral zones. If park housing is allowed to deteriorate to the point where it cannot be inhabited, this problem and its environmental impacts will simply get worse. In addition, if park employees are no longer able to live in the park, they will be forced to drive each day from Petaluma or even farther away. This will result in an increase in GHG emissions caused by poor park housing maintenance. Wildlife and plant resource protection. Park staff protect wildlife and native plants (seals, fish, elk, mollusks, migratory birds, bats, etc) from harassment by dogs and visitors, illegal harvest and fishing, and other types of harm. The EIS must discuss and mitigate the effects on these plants and animals from reduced enforcement. Here are some specific examples of negative environmental impacts that will happen when the budget for wildlife and plant protection is cut as a result of implementation of any of the alternatives. Protection of breeding harbor seals. Drakes Estero is closed to navigation by vessels of all kinds during harbor seal breeding season. Budget cuts to resource protection and law enforcement staff resulting from the increased costs associated with the selected

alternative will result in increased illegal boating in Drake's Estero, which will result in disturbance of the breeding harbor seals. PORE documented this harm in the data collected previously in the Estero. Disturbance of migrating birds. In a violation of its obligations under the Migratory Bird Treaty Act, PORE presently often fails to prevent people and illegally unleashed dogs from harassing migrating shorebirds on Point Reyes beaches much of the time. Park staff occasionally patrols these beaches, and coordinates volunteers to educate the public about this problem. Budget cuts to this program will result in increased harassment of migrating birds. Sanderlings, black oyster catchers, black turnstones, whimbrels, least sandpipers, western gulls, Heerman's gulls, mew gulls, and many other avian species frequent the PORE beaches. Visitors and illegally unleashed dogs also harass animals protected under the Marine Mammal Protection Act. One example was the killing of an endangered Guadalupe Fur Seal by an unleashed dog in 2019. This harassment is sometimes prevented by the presence of park staff, but this presence will be diminished by budget cuts to this program. Protection of the federally threatened western snowy plover, listed pursuant to the Federal Endangered Species Act. PORE devotes substantial staff and dollar resources to protecting the western snowy plover by fencing its breeding habitat, doing predator abatement, patrolling the breeding area, censusing and monitoring breeding populations, and coordinating volunteers who educate the visiting public about the plover. Budget cuts to this program will increase the likelihood of extinction of the plover, since a substantial portion of the plover breeding population occurs at PORE. Reintroduction of beaver to PORE. Beaver historically lived at PORE, and played a critical role in providing habitat for coho salmon, listed as threatened pursuant to the federal Endangered Species Act. Park staff has indicated an interest in beaver re-introduction, but has stated that this program cannot be pursued at present due to lack of funding. Budget cuts to the resource protection program will decrease the chances of funding a beaver reintroduction program. This will increase the chance that coho salmon will go extinct within PORE, due to the impact of climate change on stream temperatures. These temperature changes could be mitigated by beaver ponds, which stabilize temperature. Reintroduction of sea otters to PORE. Park staff wishes to reintroduce sea otters to the ocean off PORE. This would help restore the balance between sea urchins and kelp, which would result in fisheries improvements. Cuts to the resource protection program will decrease the chances of funding a sea otter reintroduction program. Not having sea otters impacts kelp, native fisheries, and the chance for visitors to enjoy seeing sea otters. Mountain Beaver (*Aplodontia rufa*). This relatively rare species was impacted by the Vision Fire in 1995. PORE has dedicated considerable resources to restoring its habitat. The species would be negatively affected by budget cuts to this program. Habitat protection and restoration.

PORE currently spends funds to reduce invasive plant populations, and to eliminate incidents of new invasive plants. PORE also seeks to restore degraded habitat within its boundaries. The FEIS should describe the impact on park habitat of reduction or elimination of this important program. There are a myriad of examples of direct environmental impacts that would occur due to budget cuts to this program. These are just a very few examples. With the exception of Japanese Knotweed, each of the following plants is found extensively throughout the currently named Pastoral Zone, covered by the DEIS. Japanese Knotweed (*Fallopia japonica*). This is one of the top ten invasive plants in the United States. (<https://www.bobvila.com/slideshow/the-15-worst-invasive-plants-in-america-52958#bittersweet-invasive-plants>). A population has been found in San Geronimo Creek, part of which is owned and managed by PORE (through an agreement with the Golden Gate National Recreation Area.) It is absolutely vital that this invasive plant be extirpated before it spreads throughout western Marin County, especially into other PORE lands. PORE is heavily involved in fighting this plant invasion. Budget cuts resulting in a reduction of this program would have devastating environmental impacts. Jubata grass (*Cortaderia jubata*). This plant, which looks like pampas grass, is found in PORE. Recently park staff has spent hundreds of thousands of dollars to reduce jubata grass infestations. Jubata grass crowds out native plants, including species listed pursuant to the state and federal endangered species acts. It is a well known pyrophyte (spreads fire), and reduces visitor access due to its sharp serrated leaves. PORE has been provided with a map showing other infestations with park boundaries. Budget cuts to the habitat restoration program would reduce the ability to control this very highly invasive plant, with severe environmental impacts resulting. Scotch broom (*Cytisus scoparius*). PORE has spent hundreds of thousands of dollars to control this extremely invasive plant in the pastoral zone. It is especially invasive on disturbed lands, and so grows well on grazed lands. Unchecked it forms solid stands, crowding out a vast number of native plants such as iris, coyote brush, indian paintbrush and many others. It is also an extreme pyrophyte, greatly increasing the spread of wildfire, with devastating environmental consequences resulting from very hot and intense wildfires. Cuts to the existing program of control of this plant would inevitably result in

highly negative environmental consequences. Ice Plant (*Carpobrotus edulis*). This extremely invasive plant threatens a variety of listed native plants in PORE dunes and other coastal habitat, and in some inland habitats. PORE spends money coordinating volunteer programs to remove it, at least in the area near the Point Reyes Lighthouse. Cuts to this program would result in the spread of this plant, with severe environmental consequences. European beach grass (*Ammophia arenaria*). This plant is widespread along PORE coastal dunes. It threatens a variety of native plants, including Tidestrom's Lupine (*Lupinus tidestromii*), listed as endangered under both federal and state endangered species laws. PORE has spent hundreds of thousands of dollars to kill European beach grass and restore dune habitat. Cuts to this program would allow the benefits of this work to be lost as the invasive plant recolonizes the dunes, again threatening populations of Tidestrom's Lupine. English Ivy (*Hedera helix*). Another one of the top invasive species in the United States (op. cit.) this plant is beginning to cover trees throughout PORE. So far PORE staff have been unable to contain this threat, or devote significant resources to stopping its spread. Budget cuts to the habitat restoration program will prevent any funds from being spent to attack this plant, resulting in the loss of hundreds of trees and other native plants as they are covered by English ivy. Bluff lettuce (*Dudleya farinosa*). This beautiful native plant is found along the bluffs of PORE, and in some inland locations. Recently poachers have been found stealing this plant and selling it in the overseas market (<https://www.newyorker.com/news/california-chronicles/succulent-smugglers-descend-on-california>). Cuts to resource protection and law enforcement staff resulting from transfer of funds from these programs to the programs adopted pursuant to the revised GMP will result in decreased protection of this valuable native plant.

Decreased habitat restoration. PORE has spent millions of dollars restoring native habitat. A recent example was the restoration of the Giacomini Wetlands on lands owned by the Golden Gate National Recreation Area, but managed by PORE. This restoration produced huge wildlife benefits ([https://www.nps.gov/pore/learn/management/upload/planning\\_giacomini\\_wrp\\_legacyfortomalesbay\\_081026.pdf](https://www.nps.gov/pore/learn/management/upload/planning_giacomini_wrp_legacyfortomalesbay_081026.pdf)) With sufficient funds, hundreds of acres of additional degraded habitat, much of it in the Pastoral Zone, could also be restored. This would reduce the negative environmental impacts resulting from the current condition of the land, and produce many positive environmental impacts. Some examples would be reduction of habitat for invasive plants, reduced erosion, restoration of water quality, and improved visitor experience and increased habitat connectivity. Some examples of potential habitat restoration within the pastoral zone are: Restoration of wetlands and other habitat at the site of the former Drake's Bay Oyster Farm. Four years ago Gordon White of PORE told NHI that a plan was being developed to restore the wetlands and other degraded habitat at the site. Today the site remains degraded, and nothing has been done. This is a lost opportunity that will only be further delayed if funds are diverted from the habitat restoration program. See photo: [PHOTO] Olema Marsh. This 62 acre marsh is badly degraded. It formerly contained substantial numbers of common yellowthroat, cinnamon teal and other birds associated with healthy marshes. PORE recognized the need to restore the Marsh (page 6: [https://www.nps.gov/pore/learn/management/upload/planning\\_giacomini\\_wrp\\_legacyfortomalesbay\\_081026.pdf](https://www.nps.gov/pore/learn/management/upload/planning_giacomini_wrp_legacyfortomalesbay_081026.pdf)) years ago, but has never had the funds to do the restoration. Loss of funding in the habitat restoration program will cause environmental harm by failing to restore the Olema Marsh Restoration of wetlands at Laird's Landing. Restoration started at this site within the pastoral zone some years ago, but has never been completed. Only demolition of some old buildings and preservation of two historical buildings is contemplated. The wetlands were ditched by the previous occupant, causing premature draining. They should be restored, but no funds have been allocated for this purpose. The environmental damage caused by the ditch continues. Diversion of funds from the habitat restoration program will prolong the delay of this restoration. Reclamation of abandoned mines throughout the pastoral zone. Ranchers used many mines in PORE for cattle bedding and road construction in the pastoral zone. An example is shown below on Home Ranch in the pastoral zone. Further mining was prohibited, but the mines were not reclaimed, as required by the California Surface Mining and Reclamation Act. The result is erosion, pollution of streams, and loss of habitat. Diversion of funds from the habitat restoration program will prolong the delay of this restoration. [PHOTO] Soil conservation and erosion reduction projects. Land management for agriculture in the pastoral zone has resulted in many gullies and other erosional features which need to be remediated. Here is an example from Home Ranch : [PHOTO] Budget cuts to the PORE habitat restoration program resulting from funds being transferred to implementing the selected alternative in the DEIS will mean continued negative environmental impacts in all these cases, and delay of remediation. Historic Building and Archeological Preservation. This program is already failing to preserve important structures and archeological sites. The FEIS should describe the impact on these buildings and sites of further budget reductions in this

program. Buildings at D Ranch, Home Ranch, Stewart Ranch and other abandoned ranches are decaying, resulting in loss of historic values. PORE already has a very limited program to save these buildings from vandalism and the weather. Cuts to this program resulting from funds being transferred to implementing the selected alternative in the DEIS will mean continued and accelerated loss of historic values. Road and Trail maintenance and relocation. It is obvious to any driver or trail user that this program is underfunded, resulting in vehicle damage, excessive energy use, hazards to hikers, pollution of waterbodies due to erosion, and other negative impacts. The FEIS must describe the environmental impact of further reductions in this program. At the end of these comments are some photographs of road and trail problems at PORE. Cuts to the road and trail maintenance program resulting from funds being transferred to implementing the selected alternative in the DEIS will mean continued and accelerated degradation of water quality, damage to vehicles, erosion, and impairment of visitor experience. Fire. The Vision Fire of 1995 burned 15% of PORE ([https://en.wikipedia.org/wiki/Mount\\_Vision\\_Fire](https://en.wikipedia.org/wiki/Mount_Vision_Fire)). Of the 12,000+ acres that burned, thousands still harbor dead trees which are a great fire hazard. PORE has funded removal of dead trees along Limantour Road, but thousands of acres of dead trees are still standing. In addition, regrowth of pines has resulted in "dog-hair" forests. Many of these trees died, increasing the risk of another fire. A similar fire of overgrown and dead forests would cause tremendous environmental harm, including erosion, loss of habitat, and extirpation of wildlife. A photo of dead trees left from the fire: [PHOTO] Adopting programs, including mitigation and monitoring programs, pursuant to the EIS without specific commitments to funding, will lead to at least one or two results 1. The new or expanded program will not be funded, or will only be partially implemented, leading to incomplete accomplishment of program goals and failure to carry out the mitigation and monitoring program, and/or 2. Funds taken from other programs will lead to reducing or eliminating the accomplishment of those programs, leading to collateral damage and negative environmental impacts. Again, due to massive cuts to federal revenue and increases in the federal deficit even during this period of economic growth, there is no chance that that PORE will receive any substantial new revenue, except perhaps for a small amount to address deferred maintenance issues. An economic downturn will inevitably result in additional PORE budget cuts. For these reasons, it is critical that the FEIS considers these budget issues, and their inevitable environmental impact. Page numbers refer to pagination in the EIS. Page 6

"Implementation of some programmatic direction, such as future development to facilitate public use and enjoyment, would require additional project-level planning and compliance to develop and analyze site-specific proposals and cost estimates." Cost estimates need to be prepared now, so that the costs of each alternative can be compared, and the impact of those costs on the environment, as well as the impact on other park programs, can be evaluated. Page 9. "Action alternatives carried forward for detailed analysis must (1) meet the purpose of and need for taking action to a large degree, (2) be technically and economically feasible, and (3) show evidence of common sense (CEQ 1981)."

We concur. In this case, economically feasible means that the PORE budget is sufficient to carry out the alternative, both with respect to capital outlay and ongoing operations and maintenance. In discussing the alternatives, the EIS must include the cost of implementing the alternative, how it would be paid for, and what environmental impact would occur if existing programs had to be curtailed due to budget substitution to pay for the new program. Page 11. "In addition, NPS previously conducted spring species composition monitoring at key area monitoring locations during multiple, but typically nonconsecutive, years from 1987 to 2011." Why was this program discontinued? Was it budget constraints? Alternative A. While presumably no additional costs would be incurred if this alternative were selected, the discussion on page 25 makes it clear that future costs to manage elk populations would increase. Since no plan of management is proposed, the costs and environmental impacts of incurring those costs are not considered. We can accept deferring this disclosure of environmental impacts in the FEIS if this alternative is selected. Alternative B. There are a wide variety of proposed actions in this alternative. As stated above, please describe the costs of implementing each of the following actions, how these costs would be paid for. If the cost burden falls on PORE, assuming no increase in PORE general funding, describe the environmental impact of cutting the programs described above to pay for the proposed actions. If ranchers or some other funding source are expected to bear these costs, please so state. Proposed actions: Virtually every item in table 2 would have an associated cost. In some cases, these costs are already being incurred, but in most cases new expenditures would be required. Even items which mention seeking outside funding have substantial upfront costs in terms of research and grant preparation and submission. Some of these items would be substantial new programs with equally substantial costs. The only way the public can determine if PORE actually intends to carry

out the preferred alternative is to know what it would cost, where the money would come from, what existing programs would be impacted, and what the environmental consequences of those impacts would be. Page 31. "Implementation of the actions and developments proposed in this EIS depend on funding available at the time of need. The approval of this EIS does not guarantee that the funding and staffing needed to implement the plan would be immediately forthcoming. Instead, the plan establishes a long range vision to guide future management of the planning area." We appreciate the honesty of this statement, but the EIS assumes certain levels of environmental impact based on implementation of the actions described in table 2. Under NEPA agencies cannot simply list proposed mitigation or other actions if they do not have the means to carry them out. If the preferred alternative is adopted without sufficient funding, the EIS must make clear the many and varied negative environmental consequences that will occur. Even such relatively simple and low cost items in table 2 such as water quality monitoring must be considered speculative in light of the recent cutbacks of water quality monitoring by PORE. "NPS would strive to improve hiking, biking, and equestrian access in the planning area through enhanced trail connections." "NPS would also work to develop public information and safety messages to support recreational activities that involve walking through active pastures without defined trail alignments." "To facilitate north/south trail connectivity across the planning area, NPS envisions a mix of established trails and off-trail routes with crossings across ranch lands to provide recreational access." (emphasis added). Phrases like "strive", "work to", "envisions" and several other similar words promise and guarantee nothing. PORE must include these actions as mitigation and monitoring measures, and describe how it is going to fund them. The whole bicycle proposed program will require substantial funding for environmental analysis, plant surveys, erosion review and many other expensive elements. If the bicycle improvements proposed are part of the preferred action a funding source to do this work must be described. Day use and overnight accommodations. Is this part of the preferred alternative? Recently PORE demolished more than a dozen existing summer cabins at Duck Cove, which could have been restored to day use or overnight use by an outside contractor. PORE did not solicit interest in such a project. Even though the cabins have been destroyed and the area has become safer for visitors to use, the road to Duck Cove has not been opened to the public, despite the fact that the beach at Duck Cove would make an ideal day use area. This history raises the question of whether PORE really intends to increase day use and overnight accommodations. We provide this example to demonstrate that unless specific funding sources are identified, any expansion of day use cannot be considered realistic, since day use incurs substantial costs such as construction and maintenance of parking, trash removal, restroom construction and maintenance and expanded law enforcement. To our knowledge, PORE has not added even a single permanent restroom in the entire Seashore for many years, let alone created any new day use areas. This is due to lack of funding, and the same constraint will apply to these proposed facilities. Pages 31-32: "Development to Support/Enhance Interpretation and Education NPS would explore new opportunities, techniques, and contemporary media to help interpret park resources and ranching in the planning area. NPS would collaborate with ranchers and other park partners, such as Point Reyes National Seashore Association or park concessioners, on interpretive messaging and techniques that share the story of ranching in the park. As ranch operations diversify and engage in additional public serving activities using existing infrastructure, NPS would collaborate with ranchers to find opportunities to integrate interpretive and educational messaging. Selected waysides would be focused at existing destinations, such as at trailheads and the visitor center, and could also be installed at key pullouts, such as along L Ranch Road. NPS would preserve and interpret the historic RCA Receiving Station under all alternatives. NPS could cooperate with a non-profit group and could also explore expanded adaptive uses of the facility, including overnight uses, through a park partner or through a request for proposal process. NPS would also expand interpretation and visitor opportunities around the Naval Radio Compass Station. NPS would place a trailhead on Sir Francis Drake Boulevard and use the old road to/through the property as a trail to the site of the former lifesaving station and the naval radio compass facility. NPS would also provide interpretation of these historic resources to enhance the visitor experience. Non-historic structures associated with the property would be removed. Development Related to Shuttles and Parking NPS may continue to use shuttle or other operations to manage traffic and crowding issues at various locations in the park. The park would explore additional or expanded shuttle use, or collaborate with the county to expand transit systems, as tools to manage visitor use. NPS would also seek improvements to parking at trailheads to improve visitor safety and facilitate access to trails and park destinations." (Emphasis added). Words like "would", "could", "may", "would also seek", "would explore" are extremely conditional phrases. The only operative word for mitigation measures is "will". Anything less is speculative. Without cost estimates and without a discussion of the environmental impact of these costs on existing programs these speculative programs do not belong in an EIS. A myriad of court



decisions have stated that an EIS must describe real and funded, not speculative, programs and their environmental impacts. Page 36. What will be the initial and annual costs of preparing, negotiating, signing, implementing and monitoring the proposed Ranch Operating Agreements? Page 37. Diversification into row crops, poultry and other crops will attract wildlife. Ranchers will complain that wildlife is disrupting these operations. How will the park respond to these complaints, and what costs will the park incur in responding, and in subsequent additional wildlife management? This sounds like a repeat of the Elk/Cow problem. Such problems should be avoided. Alternatives C through F. We reiterate our comments from above, as they apply to these alternatives. The public needs to see the capital and operating costs of implementing each alternative, and the environmental impacts of incurring such costs, as well as the environmental impacts of diminished funding for existing programs to make an informed comment on their comparative merits. To follow up on our scoping comments, we believe that only weed free feed and seed should be used at PORE. If it is too expensive for the ranchers, PORE, as part of the preferred action should pay for the incremental cost compared to convention feed and seed, in order to avoid expensive invasive plant monitoring and elimination programs. The environmental impact of these costs should be described and mitigated. Mitigation and monitoring. Even in the extensive description of the preferred alternative, there is very little description of the timeline and cost in dollars and staff time of the required mitigation and monitoring program under NEPA. This can be very expensive, especially with respect to monitoring the management of thousands of cattle and the hundreds of elk. This section needs to be detailed with respect to what it will cost per year, and how many staff hours will be devoted to it. Assuming a level budget, what existing programs will lose funds as a result? Additional alternative which should be adopted independently, or as part of any alternative which is selected to be implemented. As part of the mitigation and monitoring requirements of NEPA, PORE should adopt a parking fee at all large parking lots. More than a million cars per year visit PORE every year. A parking fee of \$10 for a week long pass, or \$30 for an annual pass, would bring in a net of more than \$5 million per year, after the costs of administering the program. These funds could be used to avoid any budget cuts to existing programs, eliminating the very harmful environmental impacts described above. The funds could also be used to implement the selected alternative and accompanying mitigation measures. It appears that the Federal Lands Recreation and Enhancement Act (FLREA) (16 U.S.C. §§ 6802) authorizes imposition of parking fees at PORE. Entrance fees are distinguished from recreation (and parking) fees in the FLREA. PORE authorizing legislation prohibits collecting entrance fees, so that cannot be considered as an alternative source of revenue. Only Congress can authorize entrance fees. But the FLREA does authorize PORE to collect parking fees as long as recreation is provided at the parking area. This clearly is the case at PORE. Thank you for considering these comments, which should be made part of the official record. [ADDITIONAL PHOTOS ATTACHED AT END]

#7602

Name: Kubitz, Kermit

Correspondence: According to the EIR, many of the ranches are in "poor to good" condition - therefore removal (EIR 4.87) of many "historic" ranches will not involve substantial economic cost.

Given that the Point Reyes National Seashore is the only National Park with Tule Elk, and the small number of Tule elk, clearly, Alternative F, removing the ranches from public land and allowing the Tule Elk to roam free is the best alternative - Choose Alt F. Moreover, the ranches may have an unintended impact on protected marine mammals, recently a seal was killed by a dog on the beach- roaming on park land and public beaches are in incompatible use.

#7603

Name: Phillips, Julie

Correspondence: I submitted written comments after attending the NPS Public Meeting on Wednesday, November 14, 2018 at Point Reyes Station on the EIS Scoping Document for General Management Plan Amendment process, and also submitted extensive comments by mail on November 15, 2018. \_The Public Meeting and GMP Amendment documents handed out at the general public at the Public Meeting gave more clarity and direction to the proposed options. I do not believe that any of my concerns, comments and/or

expertise on Tule Elk (with over 35 years of research and studying Tule Elk in California) were incorporated into the GMPA. In fact the entire public process seems to have been totally disregarded by the PRNS Management Team. It, again, appears that the Ranching operations WILL TAKE PRIORITY over the native wildlife and landscape at PRNS! By observing and reviewing public comments during the hearings in 2018 and online, I still am convinced that the MAJORITY OF THE PUBLIC supports free-roaming Tule Elk at PRNS OVER a private CATTLE OPERATION as well as other proposed agricultural operations in this NATIONAL PARK! Please, again, review my extensive comments below including the FACT that the CATTLE OPERATIONS/FAMILIES were compensated millions of dollars by the American public to compensate them for their lands (i.e. sold the ranches)! So, Pt Reyes ranches enjoy taxpayer funded & subsidized grazing fees, housing & infrastructure! 1. Point Reyes National Seashore should be managed under the Point Reyes Act for "maximum protection, restoration and preservation of the natural environment". Prioritizing commercial dairy, beef and agricultural leases on these National Park Lands is not consistent with current NPS practices! This is also clearly a VIOLATION of THE PUBLIC TRUST DOCTRINE that holds these public lands in trust for present and future generations! The former commercial lease-holders were paid millions of dollars to purchase their original lands am! most of the original landowners and family no longer farm these public lands! In addition, what message is the PRNS leadership, NPS administration and elected involved in this long process sending to the young people of this country? It is time to restore PRNS to its original native landscape that supports native wildlife, including California's endemic Tule Elk, and other all native species of wildlife! Commercial agriculture and dairy ranching operations in this national park would clearly not be supported by the majority of people in the state of California as well as most Americans. In addition, what message are you sending the young people of this country about the role and mission of these Restricted-Use Lands! 2. The native landscape, native wildlife species, public access and enjoyment should be the #1 priority at Pt Reyes and should take priority of any commercial activities! The Pt. Reyes National Seashore landscape is clearly a degraded landscape as a result of overgrazing activities for many decades! These poor land use policies and practices must certainly impact the local watershed including the coastal areas. It is time to implement a Native Landscape and Species Restoration Ecology Plan and Vision for PRNS -Alternative F would help in starting this process! That vision should include protection of the native Tule Elk which will play an integral role in "restoring" the native grasses, shrubs, herbaceous forbs, trees and other wildlife across the current degraded landscape. Restoration Ecology is now taught in most public institutions including colleges and universities! Time to practice what we all preach on public lands at PRNS! The old vision and mission at PRNS are outdated and clearly confuses the public (including students and visitors from all over the world and locally) what a National Park is and should be! 3. Tule Elk are an integral part and component of the native landscape at Point Reyes. The reintroduction of Tule Elk was an important step in restoring the native landscape at Point Reyes as well. Tule Elk as an integral component of the native landscape, are critical in "restoring" the native wildlife (including native grasses and other plant species) at Point Reyes. Tule Elk are a "keystone" species of the native landscape and critical in the long term health of this National Park. What "public" meetings were conducted to come up with this vision? Who met with public officials, park officials and others to come up with the proposed direction of removing native Tule Elk as well as basically "eliminating" all native species within the park? Who authorized the decision to basically kill and let die over half of the "captive" native Tule Elk in PRNS? Has such a process or decision ever been done before within National Park lands in the United States? Who within the California Department of Natural Resources and specifically, the California Department of Fish & Wildlife, allowed the "fenced" Tule Elk to die due to a lack of access to freshwater? The current and proposed cattle and farming operations are incompatible with the mission of these public lands! Clearly, the extremely degraded landscape serves as a clear indicator that these "ranching activities" are not compatible with this fragile and highly degraded ecosystem. In addition, the other agricultural activities such as mowing should not be allowed in this park as these activities clearly harm native and protected habitat and species! As one who taught Environmental Science in the California Community College System for over 27 years including topics such as the role of National Parks in protection of our public lands and Environmental Stewards who fought to create and protect lands for the public (such as John Muir, Aldo Leopold and others), I believe they would be saddened and shocked by the current practices at PRNS as well as the proposed priority of domestic livestock and farming practices over native landscape and native species (including a California Endemic Species, the Tule Elk). Julie Phillips, Tule Elk Biologist (1982-2019), California Resident/native Californian Environmental Scientist, Community College Instructor and Educator for over 30 years Submitted in person and by mail August 27, 2019

#7604

Name: Gregg, Louise

Correspondence: PLAN B- Seems fine except for the elk issue. There are 5,530 cows and 674 elk living on the National Park Service lands. Dr. Laura Alice Watt concluded in her article, "Tule Elk at Point Reyes: A Long History Relocation," 09/19/19, to relocate The Drakes Beach herd and fence in the Limantour heard. The part about fencing in the Limantour heard makes sense but relocating the Drakes Beach herd does not when the N.P.S. says they can manage a heard of 120. I do like her about relocation though. Relocate any elk at Drakes Beach that exceeds the 120 limit. And while you are relocating elk we could bring back some from other distant herds to strenthen the gene pools. More could have been written about the environmental impact caused by agriculture. Point Blue wrote a 2 year study called, The Silage Report. This report shows ways the ranches could plant and harvest Their crops in harmony with the wild life they live with. The Ravens have become a big problem for the threatened Western Snowy Plovers. The ranches have unknowingly Supported the flocks that have increased out of proportion . They need to be controlled because they are the #1 killer Of the WSP. The Marin Co. laws that protect our water shed are not being enforced in the N.P. The ripairan setbacks of 100 ft. Should be a part of Plan B. All in all our most important job is to care for our environment, wildlife and wilderness. Like the California Coastal Commission the Point Reyes National Seashore serve the Nation not the lucky few.

#7605

Name: Winning, Birgit

Correspondence: RE: Regarding the National Park Service's Proposed Plan to Shoot Tule Elk Our family and friends are regular visitors to the Point Reyes National Seashore. We come for healthy recreation, to appreciate the Tule elk and other wildlife, and take hikes to enjoy the natural world. I am very concerned that the National Park Service is proposing that commercial activities should take priority over native wildlife at PRNS. I strongly oppose the proposed shooting of the elk, and support restoring the native ecosystem by ending the leases to the private ranchers. The elk populations at PRNS are already impacted by restricted access to water and bacterial diseases. They should be provided additional grazing acreage through the removal of fences that were put there for the containment of cows owned by private interests. The Park Service should be dealing with environmental challenges such as the impact of climate change on the local ecosystem and the state of the water quality in the park, which is affected by bacterial and nutrient pollution from the ranches. Our tax dollars were used to purchase the land at fair market value from the cattle and dairy ranchers with an agreement that these commercial operations would be phased out. Our national parks should serve the public at large and not subsidize private ranching or any other agricultural activities. Finally, I do appreciate the principle for integrating the human dimension into ecosystem management. In this case, an implicit agreement already exists for ending agricultural activities in the park and for prioritizing the native wildlife in the park. Thank you for your consideration.

#7606

Name: Timineri, Robert

Correspondence: Theodore Roosevelt addressed the crowd: "Leave it as it is, you cannot improve on it. The ages have been at work on it, and man can only mar it. What you can do is to keep it for your children, your children's children, and for all who come after you, as one of the great sights which every American, if he (or she) can travel at all, should see. He wasn't standing near the visitor center at Pt Reyes' he was speaking near what is now Bears Ears National Monument. But the 26th president offered guidance, a vision, an aspiration, you can do is to keep it for your children. (Summary of above information From Sierra magazine, Sept/Oct 2018 issue.) That guidance and directive is a reason why I am a volunteer in the Volunteer Management Office at Pt Reyes National Seashore. I became a volunteer to support the land and the creatures that live there: for your children, your children's children, and for all who come after you. Now I am having doubts: just whom am I supporting? OITA WA, Feb. 8, 2018 /CNW/ - Today, Grey, Clark, Shih and Associates, Limited (GCS) released an updated report detailing how the American government continues to provide massive levels of support to its agri-food sector at federal, state, and local levels. The study, which focuses on changes introduced by the 2014 Farm Bill, shows that in 2015, the American government doled out approximately \$22 .2 billion dollars in direct and indirect subsidies to the U.S

dairy sector. According to recent data from Metonomics, the American government spends \$38 billion each year to subsidize the meat and dairy industries. According to recent data from Metonomics, the American government spends \$38 billion each year to subsidize the meat and dairy industries. The park's 3,500 dairy cows and 2,500 beef cattle are part of the subsidy. On top of these benefits, the ranchers receive below-market rents and discounted grazing fees. The NPS improves and maintains road and other infrastructure, such as they are. Here's an overview, from the NPS website, of the operating and maintenance budget: Infrastructure - The National Park Service estimates that in FY 2017 there was more than \$11.6 billion in backlogged maintenance and repair needs for the more than 5,500 miles of paved roads, 17,000 miles of trails and 24,000 buildings that service national park visitors. In 2017 330 million people visited the 417 NPS sites across the country. The NPS retired over \$650 million in maintenance and repair work in FY 2017, but aging facilities, increased visitation, and resource constraints have kept the maintenance backlog between \$11 billion and \$12 billion since 2010. Alternative B compounds all the above documented subsidies and maintenance backlog. And transforms my volunteer work to another subsidy to an industry whose presence in the park mitigates why I chose to be a volunteer in the first place: Theodore Roosevelt addressed the crowd: "Leave it as it is, you cannot improve on it. The ages have been at work on it, and man can only mar it." Mr. Secretary, David Bernhardt: First, stop the marring!

#7607

Name: Fox, Camilla

Correspondence: Re: National Park Service's Draft Environmental Impact Statement on the General Management Plan for Point Reyes National Seashore and Golden Gate National Recreation Area Dear Superintendent: These comments to the National Park Service's (NPS) Draft Environmental Impact Statement (DEIS) on the General Management Plan for Point Reyes National Seashore and Golden Gate National Recreation Area are submitted on behalf of Project Coyote and our California supporters. Project Coyote is a national non-profit organization based in Marin County, California. We have more than 8,000 supporters, activists, advisors, volunteers and staff working together to promote compassionate conservation and coexistence between people and wildlife through education, science, and advocacy. Our supporters include nationally and internationally recognized scientists, educators, ranchers, political leaders and everyday citizens who strive to change laws and policies to protect native carnivores from abuse and mismanagement, advocating coexistence instead of killing. We seek to change negative attitudes toward wolves, bobcats, mountain lions, coyotes and other misunderstood predators by replacing ignorance and fear with understanding, respect and appreciation. Thousands of our members and supporters live and work in California, and many are regular visitors to Point Reyes, a federally designated protected area, where they partake in hiking, camping, birdwatching, photography, wildlife observation and study, kayaking, and beach-going. Project Coyote has many concerns about issues discussed in the draft, including the overall thoroughness of the DEIS, and is particularly troubled by several aspects of the "preferred alternative" identified by the NPS. Set forth below are just a few examples. In addition, we urge the NPS to include within the DEIS generalized budgetary costs of the various alternatives, and to identify relevant funding sources. Agricultural Diversification and Ecological Impacts The DEIS mentions two specified allowable forms of agricultural diversification in the Park: row crops and new livestock species (particularly pigs, goats, sheep and chickens). There is no analysis or discussion of the environmental consequences of this diversification. This must be rectified before such diversification is chosen and implemented. Row crops will attract a host of animals (native and non-native) such as various rodents, skunks, gophers, moles, voles, deer, and fox, who prefer to consume vegetables or leafy greens. These will in turn attract small to mid-size predators, such as bobcats and coyotes. Retaliation toward species deemed "pests" or "vermin" is inevitable, and despite the NPS' assurances that no rodenticides or other lethal measures will be allowed, killing and retribution will very likely occur, and these actions can have cascading detrimental effects on the local ecosystem and on non-target wildlife, including threatened and endangered species. Introduction of other livestock farm animals into the park (the livestock species referenced above-pigs, goats, sheep and chickens) will almost certainly attract other larger predators seeking easy prey. Coyote, bobcat, and mountain lion populations would undoubtedly increase, bringing with them a host of possible human/wildlife conflicts. There is a large extant literature on the ecological impacts of cattle on ecosystems, which we discuss in our comments below. In addition to these well-known ecological impacts detrimental to ecosystem function and services, agricultural diversification is likely to greatly alter the ecology and wildlife patterns in and around the park, and result in an environmental disaster for the animals, the leaseholders, and park visitors alike. All this,

combined with continued climate change and disruption that will exacerbate impacts, must be addressed as part of the EIS process. Climate Change and Climate Disruption While federal law does not yet mandate that climate change analysis be considered and presented in the NEPA/DEIS process, most policymakers and governmental agencies realize that the climate represents an existential threat to the planet, and is already affecting the weather, sea levels, polar ice levels, water temperatures, and more. Methane is known to be one of the most potent greenhouse gasses, and methane from cows to be one of the most prevalent sources of emissions. Other threats include: -Rising Seas -Tidal flooding -Shoreline erosion -Saltwater intrusion - Larger storm surges -Chronic or permanent inundation of roads, beaches, marshes, etc -Ocean acidification -Worsening air and water quality - Longer and more frequent heat waves and droughts -Longer wildfire seasons and hotter and more frequent wildfires Apart from a very cursory analysis in the air quality section (pages 188-192), none of these life-changing impacts is even mentioned in the DEIS-much less analyzed comprehensively. Not only is methane (CH<sub>4</sub>) one of the most potent greenhouse gasses, it has 80 times the heat-trapping properties of carbon dioxide (CO<sub>2</sub>). A study out of UC Davis reveals that a single dairy cow will belch 220 pounds (~99 kg.) of methane per year. Agriculture (mostly cows) contributes almost 25% of all greenhouse gas emissions worldwide according to the World Resources Institute, which found that over the next 20 years, dairy and beef cows will have twice as much impact on climate change globally as will all of the world's passenger vehicles. In addition, manure management accounts for about 14% of total greenhouse gas emissions from the agriculture economic sector in the United States. It is imperative that this impending crisis be front and center in the environmental impact analysis, and that the DEIS be redrafted to include ways to address the many serious impacts of climate change, as well as ways to mitigate cow-based emissions with better manure management, feed practices, etc. Tule Elk Culling Project Coyote strongly opposes lethal culling of the Tule Elk herd within the Point Reyes/GGNRA planning area. To the extent that reducing the elk herd to keep it sustainable becomes absolutely necessary, non-lethal control measures (including contraception, or tranquilization, removal and relocation to other suitable habitats in Northern California, etc.) should be utilized. Dairy Ranching Due to the substantial emissions and the intense and impactful manure and water quality issues resulting from their operation, dairy ranching facilities should be phased out over a period of five years, as set forth in Alternative E of the DEIS. Cattle Ranching Rather than increasing the level of allowed beef cattle AUs to offset the loss of dairy ranching operations, the number of beef cattle AUs allowed should remain constant or be reduced, in order to best serve (1) the statutory purpose of national parks under the National Park Service Organic Act, which is "to conserve the scenery and the natural and historic objects and the 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;" and (2) the Point Reyes Seashore enabling legislation, as amended, which states that the NPS shall administer Point Reyes "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.) It is clear (even from the deficient DEIS) that extensive beef ranching on park lands has, and will continue to have, deleterious environmental impacts on the area's soils, water quality, vegetation, wildlife (including the Tule Elk), and the climate. Reducing the acreage allowed for cattle ranching, as set forth in Alternative E, will help. Extension of ranching operation leases on the remaining ranch lands to the legacy ranching families shall be allowed, but such lease extensions should be limited to five years, with limited infrastructure, mandatory regular environmental impact reviews, and subject to Best Management practices. No diversification of agricultural activities shall be allowed. To the extent that lease extensions under these parameters are appropriate, only members and descendants of the original ranch families can participate. No "new" ownership interests shall be allowed, in keeping with the intent of the enabling legislation and other agreements made when these park lands were acquired from those legacy families. When and if existing families leave, retire, abandon their lease(s), or otherwise vacate their leaseholds, those lands shall be transitioned from cattle ranching to the natural and indigenous ecosystems. Conclusion The law requires that the NPS seek to implement the most protection and least detrimental consequences to the environment (including wildlife, water and soil) in its management and oversight of the Point Reyes National Seashore. Preliminary, the NPS should redraft the EIS to discuss the climate change issues referenced above, include budgetary sources and uses, and discuss how it intends to implement the plan such that it is supportive of the maximum protection of the natural environment of the area. These comments by Project Coyote outline a protocol (with parts taken from Alternatives D, E and F in the DEIS) that accomplishes this mandate, while allowing much of the historic cattle ranching operations to continue (albeit in a

more restricted manner). We welcome further discussion with you about this matter. Thank you for your consideration. Respectfully submitted,

#7608

Name: Salzman, B

Correspondence: Dear Superintendent Muldoon:

Thank you for the opportunity to comment on the General Management Plan Amendment and Draft Environmental Impact Statement for the Pt. Reyes Seashore and the Northern District of GGNRA. Our comments focus on the National Park Service's (NPS) responsibility to protect native wildlife, habitats and ecosystems - that we consider to be the fundamental and primary responsibility of the NPS at Point Reyes. Marin Audubon supports natural ecosystem restoration and limited agriculture at the seashore as described in our proposed preferred alternative below. The 1962 legislation establishing Pt Reyes had nothing to do with agriculture or cultural resources. It calls for reserving "a portion of the diminishing seashore of the United States that remains undeveloped." The 1972 GGNRA enabling legislation directs NPS to "preserve for public use and enjoyment of certain areas...possessing outstanding natural, historic, scenic, and recreational values...as far as possible in its natural setting areas, and protect it from interpretation and development and uses which would destroy the scenic beauty and natural character of the land" brings in historic resources with a restriction that the natural character of the land not be destroyed. The 1978 congressional directive qualifies that Pt. Reyes be managed "without impairment of natural values ...." and "that are consistent with, and based upon, and supportive of maximum protection, restoration, and preservation of the natural environment within the area." The NPS is straying far from these directives to protect the natural character of the lands, promote uses that would not destroy the natural character of the land, or would not impair natural values and that are consistent with maximum protection, restoration and preservation of the natural environment. The 2019 Resolution 31 defining multi-generational ranching and dairying as being "fully consistent with Congress's intent for the management of the Point Reyes National Seashore" is not supported by the DEIS, its analyses or science. The interests of ranching and private ranchers are taking precedent over Pt. Reyes environmental protection responsibilities. We note that the 2019 directive does not appear to apply to areas within GGNRA . This Plan amendment justifies continued, permanent ranching over natural resources based on ranching being a cultural resource. The preferred Alternative B has been developed to perpetuate 26,100 acres of ranching and would cull the native elk herd to ensure ranching is not disturbed. The alternatives that would remove or reduce ranching appear to be straw men, designed to be rejected. C, E, and F set a schedule that is unrealistic and extreme, in fact, punitive. The time line is unreasonable and would pose a hardship to expect a family to close their ranch in one year, as proposed in D, and perhaps even to change operations in five years. We have evaluated the preferred and other alternatives with consideration for ranchers with the recognition that grazing, if done responsibly can provide limited habitat for wildlife, and that the lands have sustained families through generations. We propose an alternative with the long-range goal of expanding and restoring natural habitats and eliminating ranching over an extended period of time except for a limited acreage, if necessary, to preserve agriculture as a cultural heritage.

**MAS RECOMMENDED ALTERNATIVE**

MAS recommends that a more realistic alternative that would phase out ranches gradually based on attrition, be identified as the preferred alternative. It would allow current ranchers to remain until either they or their children want to stop ranching. It would provide for a gradual transition that would be fairer to ranchers while benefitting the elk population, other wildlife and natural resources of the park by expanding and restoring their natural habitat in the long term. It would recognize the park mandates, allow the elk population to expand gradually, and provide for nature and the NPS to restore stream, grassland and other habitats on the grazed lands. Retiring of ranches should be accompanied by restoration of vegetative and aquatic habitats for wildlife. A specific reduced acreage or a few historic ranches could be retained in ranching to preserve cultural history and grassland habitat. Prescribed grazing also could be used to provide short grass habitat and/or cultural resources. This would allow visitors to observe ranching, as well as the majestic elk which are what visitors really come to see. People can view grazing cows in probably any state in the union, and just by driving along Highway 1 in West Marin. 26,100 acres of grazing cattle is not needed to protect agriculture as a cultural resource. The draft succession policy should be

modified to terminate ranching operations on a given ranch if named lessees do not wish to enter into a lease/permit; cannot agree upon an arrangement among lessees for continued operations; or have consistently not met performance standards. No other effort should be made to seek lessees from inside or outside the park. The land should be retired and revert or be restored to habitat. Discontinuing ranching based on gradual succession and restoring habitats on lands where family members do not wish to continue ranching would be kinder to ranching families and much more in keeping with the natural resource protection mandate. A few ranches could be selected to maintain cultural ranching based on lack of natural resource values. Ranches with important natural resources should be identified for habitat restoration. While the justification for continuing ranching is to preserve cultural values, continuing ranching on 26,100 acres is not necessary to protect cultural resources, even if this is a valid categorization, nor is that acreage needed to demonstrate ranching as a cultural resource. Protecting agriculture as a cultural resource could be accomplished on a few ranches and a few thousand, or even hundred acres. In addition to failing to protect natural values, the rigid long-term approach of Alternative Band other alternatives, to retaining the huge ranching acreage fails to recognize that times change, people change, families change, socio economic conditions change, and climate is changing. It is not the responsibility of the NPS to maintain cultural/agricultural uses on thousands of acres when the families do not wish to continue, nor is the NPS responsible for continuing agriculture viability in the region. This is a time when the dairy industry is declining, and recommendation has been made by the International Panel on Climate Change that to sustain the planet, people need to move to a plant based diet. MAS asked for a reduced ranching based on attrition alternative in our EIS scoping comments, and we again urge that it be considered. As discussed below, it is clear that reducing or eliminating ranching would greatly benefit the park's natural resources, would allow more water for natural resources, more habitat, fewer impacts on wildlife, and more natural vegetative communities - more in keeping with the Park's mandate to protect natural areas and character of the land. HABITAT RESTORATION NOT ADDRESSED

Considering the legislative directive to protect, restore and preserve the natural character of the land, restoration of natural values should be an integral part of the alternatives. The Plan should discuss the NPS current projects and future plans for habitat enhancement/restoration for elk and for the full range of species that depend on Point Reyes and GGNRA. Restoration does not appear to be considered in any of the alternatives. This is particularly evident in Alternative F, which discontinues ranching, but instead of increasing habitat enhancement on the vacated lands, visitor use is expanded. The DEIS should recognize that removing or significantly reducing grazing would allow gradual restoration of habitats, either by nature or active NPS projects. There should be a discussion of species and habitats that would benefit from restoration. The discussions of F and D sound like the vacated ranches would be left and would remain in a degraded state in perpetuity. How habitats where grazing would be removed, would be expanded and enhanced to benefit the ecosystems should be discussed. Staff resources needed for managing ranch activities could be redirected to restore natural habitats to benefit native species. IMPACT DISCUSSIONS INADEQUATE

The primary justification for retaining and expanding agriculture is the establishment of a zoning framework consisting of Natural Resource Protection, Range, Pasture, and Ranch Core Subzones. These zoning categories are intended to locate grazing out of sensitive resource lands and restrict grazing to what are considered to be low value lands. We'd like to first point out that the very recommendation for such a framework acknowledges that grazing has adverse impacts on natural resources that need to be avoided or reduced. A zoning framework would not be needed if all impacts were beneficial. The effectiveness of a zoning framework depends on a number of supporting components, none of which are assured as discussed below, therefore, the effectiveness of the zoning framework is unlikely: 1) Compliance. The proposed benefits depend on the ranchers complying with zoning categories and restrictions of their leases. But compliance is at best uncertain. There is no discussion of rancher compliance but there is evidence of noncompliance: there are more AUs on some ranches than limits allow. We note, also, that there are extensive reports of over grazing in comment letters. Nor is it reasonable to expect uniform compliance. The potential for noncompliance and resulting adverse effects must be acknowledged along with associated adverse impacts. We realize that the NPS assumes compliance, but this is not a realistic assumption. 2) Monitoring and Enforcement. An effective monitoring and enforcement program is necessary to assure compliance. This too is uncertain. There is no discussion of the park's monitoring and enforcement program that would enable the reader to evaluate its adequacy. The requirements that are in leases to protect the

park's wildlife and habitats are not known. The effectiveness of the monitoring and enforcement cannot be evaluated.

3) Adequate Funding. Costs of monitoring and enforcement would increase with the proposed zoning because the increased requirements will mean more oversight and enforcement is needed. The new zoning, diversified activities (e.g. goats, chickens, sheep and crops) would attract predators, even though confined by zoning, fencing or structures. More funding would be required to provide staff to manage and enforce the program. Whether funding would be sufficient to provide adequate monitoring and enforcement is at best uncertain because federal funding has been declining in recent years even though habitats, roads and trails are badly in need of repair currently. It is clear that federal funding cannot be relied upon as a means of ensuring oversight and enforcement when needed, even if the programs are adequate on paper.

4) Adequate Mitigation Measures. Measures in Appendix D are proposed to avoid, minimize or mitigate impacts. The DEIS should identify which measures are intended to mitigate adverse impacts as the vast majority of the measures in Appendix D are actually Best Management Practices that should be required of any lessee of public land. Very few would actually compensate for adverse impacts or loss of natural habitats on public lands because they do not require or provide replacement habitat for habitats lost or degraded. Appendix D, Table D-1 Management Activities by Activity Types and Table D-11 list many types of restoration and other activities types that would benefit natural resources. But it is not certain whether they would be required or voluntary. A discussion on page D-3 states "The Park would work with ranchers during annual meetings to identify projects and consolidate and; coordinate review of ranch projects to complete compliance and authorize implementation.. This indicates the activities are negotiable and not required. With no requirement that the actions be implemented, they cannot be considered adequate mitigation.

5) Activities that would be allowed under the zoning would result in additional adverse impacts that have not been adequately identified or evaluated. Diversifying with chickens, goats, sheep, pigs, horses and visitor overnight stays would involve additional impacts that include: increased water use and water loss to the ecosystem from increased water needs for maintaining the additional AUs, loss of habitat, coverage of land that could be restored to habitat, increase conflicts with native predators, degraded water quality from runoff, and increased degradation of lands from more animals needing to be confined. Some specific impacts are mentioned here and there in the DEIS, but there needs to be a comprehensive discussion that identifies adverse impacts and mitigation measures that effectively mitigate the adverse impacts of the diversification. Mitigation measures cannot be considered adequate unless they are feasible, certain to occur and effective. Another justification for retaining agriculture is that some species benefit from grazing. The resource benefits of retaining grazing are cited as being control of coyote brush and weeds. These could be.. handled by prescriptive grazing and providing short grass habitat. Some species may benefit from shorter grass, but that is likely to be a limited number in comparison with the range of species that benefit from a natural system. Stock ponds are also mentioned as a benefit for the special status red legged frog. Natural pond and stream habitat for Red-legged Frog habitat could be restored in the natural setting.

Cumulative Impact Analyses Inadequate. Cumulative analyses of many of the impact categories are comparisons of adverse impacts to specific species, plant and wildlife species in particular. Then these piecemeal analyses are compared with a combined list of projects near or in the park that are mostly beneficial projects. There is no clear or comprehensive analysis of the cumulative impacts of grazing on the natural resources within the park. The overall cumulative impact analyses are insufficient to clarify the overall impacts of grazing compared, to benefits of removing it. As discussed below, however, it is clear that the benefits of removing grazing on native wildlife and ecological systems far exceed the benefits of retaining grazing. And, any perceived benefits of retaining grazing can be provided on far fewer acres. Short grass habitat, for example, could easily be provided by a few ranches or by bringing in animals to graze in prescribed areas.

**INCOMPLETE ANALYSIS OF IMPACTS ON WILDLIFE** The DEIS should discuss the ecosystem and the food web, invertebrates, wildlife and plants etc. that ,, depend on the park's habitat's in the planning area. Discussing elk in isolation gives an inadequate picture of the predator-prey relationships. The following should be discussed: the impacts of agriculture; on the predator populations, the opportunities for habitat enhancement for these predator-prey species and all of the other species in the food webs at Pt. Reyes. A comprehensive discussion is needed to further the natural process. Much of the information is cursory and inadequate as a decision-making tool. Another insufficiency is that the DEIS focuses on Federally listed and Special-status wildlife except that there is a more broad discussion of birds, noting that Pt. Reyes has the "greatest avian diversity of any national park in



the United States, and nearly half of the bird species on North America abound with 490 recorded...." This species richness should be reason enough to ensure that the NPS addresses the full array of species and works toward optimization of their habitats. Tule Elk Surprisingly, the wildlife section mentions but does not provide any information about the two top predator species that prey Tule elk - mountain lion and coyote. There should be a discussion of the predator prey interactions between these species. Are there opportunities to enhance the habitat for these predators? What efforts are, or could be implemented to restore a more natural interaction The DEIS should address, the current status of the mountain lion and coyote populations, habitats they prefer, evidence of preying on elk and on cattle, and impacts on ranching. We would expect that these , two species as well as other predators would be attracted to ranch animals and, therefore, could be affected by ranch activities (contrary to statement on page 77). They should not have been excluded from the discussions. How do ranchers deal with them? Are there management actions taken against these predators by ranchers or the NPS? One could expect that ranchers would want to discourage large predators from coming near their livestock, and this attraction would increase with diversification with small farm animals. The coyote population status should be addressed, their use of ranchlands and other lands in the parks, evidence of preying on young elk, dairy cows and beef cattle. Some years ago, there was an intense effort to eliminate coyotes from West Marin ranches. How are they being controlled now at Pt. Reyes? How much do these predators prey on elk? Domestic animals are another non-native predator that should be addressed, specifically non-native cats that are responsible for the death of thousands of birds annually. Bird Impacts Avian impacts of grazing include, according to the DEIS: reduced habitat due to invasive species, ground nesting birds would be susceptible to trampling from livestock; bird collisions with barbed wire fencing, predation by ranch cats and reduced riparian habitat from grazing cattle. Other impacts listed below under Wildlife would also apply. Western Snowy Plover Discussion states that Mitigation measures described under A would reduce potential numbers of ravens associated with ranching. This is not what the discussion at Alternative A says. It actually says that ravens are attracted despite the mitigation measures, and that the alternative would contribute directly to impacts on snowy plover. Cumulative Impact Analyses The cumulative analyses are clear that the benefits of removing or significantly reducing grazing would be beneficial to native Wildlife. The analysis states that B would reduce some potential resource impacts because it would establish Natural Resource Subzones. Establishing this or any zoning framework will not reduce impacts. Even compliance with the zoning framework wouldn't because it would still leave vast acreages in a degraded, unnatural state. If some impacts would be reduced by removing grazing under the zoning framework, they would be reduced or eliminated even further by reducing or eliminating grazing. All of the grazing alternative analyses state that impacts would be beneficial or adverse depending on the species. This consideration of impacts to wildlife is piecemeal. There is no clear overall assessment of adverse impacts. Nor is there is consideration of the overall benefits in comparison with adverse impacts. Since the DEIS did not do a consistent or adequate cumulative analysis of adverse impacts, we have done our own from information provided in the DEIS We have compiled a list of the adverse impacts from each of the analyses and listed them here: While reduced under Alternative B, and other alternatives retaining grazing, the following stated impacts would still occur to birds and small mammals, and to a greater or lesser extent with other alternatives except F: harvest and silage mowing; impacts of grazing including, trampling, erosion and nutrient inputs; manure spreading reduced; decreased food and cover for some mammals with increased no till crops; manure spreading; with diversification the magnitude of grazing would be greater and there would be additional impacts from sheep (which could exceed 10% of AUs) and goat grazing (which would occur on 34% of the Pasture zone, chicken production which would also reduce habitat for mammals; unnatural abundance of corves, black birds, European Starlings and Brown-headed cowbirds promoted by ranching; reduced habitat for shrub dependent species; and altered habitat conditions for all native species. It follows that removing grazing from more acres would provide more benefits to native wildlife and habitats. DEIS stated benefits of no grazing include: habitat heterogeneity, increased mosaic of grazed and ungrazed, from ranching increased cover to avoid predators; higher species diversity and richness, and altered habitat conditions. The DEIS analysis recognizes that elimination (or even reduction) of grazing would have meaningful beneficial ecological impacts because the primary disturbance regime which mammals have had to adapt would be removed; wildlife would no longer be chopped up by mowers during nesting in fields; the lands would restore to natural systems' increased ground cover for small mammals, more plants would increase the abundance of deer and other species which would graze and browse on more plants; expanded wildlife movement and foraging habitat would increase with higher ungrazed grasses, there would be higher wildlife densities and more diversity, with more prey; and more cover for nesting and foraging habitats. Another benefit would be removal of domestic ranch cats which are a major cause of bird and small mammal mortality. Numerous species

would increase due to more seed producing plants, shrubs for perching and nesting; improved water quality for Tomales Bay. These benefits would be even greater with removal or significant reduction of grazing and under the MAS Preferred Alternative. Impacts that were not recognized include attraction of native predators to areas where goats, sheep are grazing, chickens confined and rancher control of predators. WATER RESOURCES

Water Quality - Under alternative B, 1,200 or 2,000 more acres of streams, ponds and wetlands would be preserved. Active ranching would be excluded from 5.9 miles of streams, 1.9 acres of ponds and 172.7 acres of wetlands. Except for prescribed grazing- there would be no ranching activities authorized in the Resource Protection Zone and the acreage of exclusion areas would increase to 2000 from 800. The statement that "The Rangeland subzone would contain nearly all the remaining surface water resources" is a concern. What are these other remaining surface waters resources and where are they? Why they are not included and what adverse impacts could occur to these surface waters from grazing and other ranching activities Adverse impacts on water quality would continue with grazing and expand with diversified AUs. Row crops, even if not irrigated, would contribute runoff during rains. It is unclear what water bodies the runoff would drain to, whether or what measures are or would be required to prevent erosion and downstream sedimentation. Manure from boarded horses and from up to 500 chickens per dairy ranch would increase nutrient loading. An increase in the number of ranches that could have chickens would increase polluted runoff. With six dairy ranches, there could be a total number of 3,000 chickens, far exceeding the current total number. Pollution from concentration of dairy cows and spreading of manure would also increase. The use of trails, particularly bike use causes erosion and downstream degradation of water. quality. Public use trails are often a source of erosion and sedimentation in downstream waterways and bodies. A more complete description of trails where bikes are being considered should be presented to enable evaluation of potential impacts of new trails on water quality and other resources Cumulative impact analysis- relies again on zoning to protect water resources and has the same problems as discussed above. The DEIS acknowledges that water quality impacts would still be adverse but diminishes the importance by saying that Tamales Bay would still be impaired. It further excuses water quality impacts of grazing saying it would be a very small contributor. This is the same justification used for removing waters from the San Francisco Estuary to go south. It's only a small part. Water Quantity Cumulative Impacts - The DEIS acknowledges that the zoning framework impact on water resources would be adverse but also that it would improve over existing conditions and be minimized by regulations and mitigations. How much B would improve over existing conditions should be described. We doubt that it would be meaningful because the acreage removed over existing conditions is not great. What are the mitigations and regulations and how will they would result in a meaningful reduction in water removed from the natural systems? The water quantity impacts are most clearly considered in terms of the total amount of water that would be restored to natural resources under the alternative that would remove grazing, F. Eliminating dairy ranching would have very significant water quantity benefits 127,000 to 300,000 gpd would be saved by eliminating dairy cow grazing and eliminating beef would save 9,192 to 39,9895 gpd for total reduction of 50 mg to 124 million gallons a day. These are incredible quantities of water that are being lost to the park, its vegetation and wildlife and other natural resources. Imagine how the wetlands, seep and stream and pond habitats on the thousands of grazed lands could increase with restoration of this immense quantity, or even a smaller portion, of water! It would undoubtedly be a different landscape. Alternatives removing cattle would have noticeable long-term beneficial impacts on the quality and quantity of water. VEGETATION

Alternative B depends on the zoning framework that will "authorize only higher intensity activities, including vegetation management and diversification, in areas without sensitive resources." We appreciate this attempt to keep damaging activities away from resources, but these unprotected areas could have sensitive resources if they were not grazed. Identified benefits of removing grazing related to resource protection include increased riparian habitat; reducing biomass; improved use areas improved; removal of dairy would reduce impacts with less concentration of cows; reducing weeds; removing manure spreading, removing forage production and fuel. All of the benefits are related to the planning areas having high levels of non-native species. More native plant communities could restore or be restored without grazing. diverse impacts of brazing - extensive non-native vegetation; special status plant species individually; light nutrient manure spreading which favors invasive plants; new livestock ( 10% above current AUs would be authorized) increased potential for (more invasive) vegetation in 30% of planning area; chicken· manure high in nutrients' adversely impact native grasslands and increase biomass,

continued abundance of non-native plants. There is no overall analysis of vegetative communities and impact of grazing on native plant communities. The Alternative F discussion does not identify any activities that would enhance or restore lands or any measures that could or should be implemented to facilitate the change to a natural ecosystem, where and when grazing would be removed. After so many years of grazing, it is unreasonable to predict adverse impacts without using measures that would convert non-native vegetation to predominantly native species to help nature along. It is disturbing that the only post- grazing activity mentioned is increasing visitor use. VISITOR USE ACCESS

Expanding visitor opportunities by expanding biking, hiking equestrian is noted in alternatives B, D, E and F, however, no information is provided about where the expansions, including day use, overnight accommodations, hiking, biking and would be located except "focusing on existing roads to facilitate connections. Some of these uses, particularly biking could have adverse impacts on natural resources as has been observed in other parts of Marin County. Until information is provided on the locations and assessment of adverse impacts of each of these uses on natural resource, this DEIS should not be certified for these activities. There is a lengthy history of trail biker-caused problems on public and private lands throughout the county. Significant sediment and erosion impacts attributed to bike trial use have been documents. The potential for "new" trails is disturbing. Why would new trails be needed to implement an early detection program? Can't this work be done off trail without creating new trails that would promote more impacts. Impacts from trail use could be significant in particular locations and should be considered in cumulative analysis. What most visitors want to actually to see at Pt. Reyes is grazing Tule elk and other wildlife. Opportunities for elk viewing would be enhanced and improved in alternative F, as would natural landscapes including native vegetation, stream and other habitats and wildlife. People have opportunities to see grazing cattle probably in every state throughout the country. If ranches are removed from planning area, they would still have opportunities to view cattle grazing outside the planning area in West Marin. The DEIS notes that Alternatives B, C, D, E, and F would contribute noticeable beneficial impacts by providing a wider range of recreational and educational opportunities. This same language is in each alternative, with the distinction in C noting that the loss of the elk herd would have a noticeable adverse impact. There should be an explanation of the distinction between the alternatives in this evaluation because it seems obvious that alternatives F and D would provide more opportunities because there would be less grazing and more natural areas.

CONCLUSION The preferred alternative is based more on politics, the former Resource Secretary Salazar's promise of 20 year leases at the time of the Drake's Bay Oyster controversy and Congressman Huffman's legislation to extend ranching leases to 20-years, than on protection of the Park's natural resources. The demand for milk is decreasing in recent years and dairy ranches are struggling. There is no expectation that this will change. The 2019 International Panel on Climate Change report recognizes the significant contribution of meat production to global warming and recommends that moving to a plant-based diet is critical for our planet's survival. Yet the NPS is putting forward a plan that locks in huge acreage for agricultural activities on the wane and may be harming our planet. The DEIS fails to demonstrate that the impact of grazing on the Pt. Reyes and GGNRA is not adverse. The DEIS is inadequate as a decision-making document. The impact analyses is inadequate, particularly cumulative impacts, and is biased in favor of specified long-time continued agriculture use which is not in the public interest and is contrary to the original intent of the park. We urge that the MAS preferred alternative be evaluated and chosen. It would be more in keeping with the park's original mandate and would allow ranching to continue with a termination and ultimate restoration of park habitats.

#7609

Name: N/A, N/A

Correspondence: 93 millions cows just in the US, @ any given time. It never makes sense to kill our natural, exquisite beings for a few hamburgers. If all the cows on Pt Reyes went away, there would be no dent in our food source. Save a way of life, the coastal ranchers? Fine, do it with 100 cows and do what is the right thing to do at this critical time in history, saving our natural world and and planet as a whole.

#7610

Name: Bohn, Diana

Correspondence: Sirs: Please adopt Alternative F! Restore the coastal habitat at Pt. Reyes!

#7611

Name: N/A, Dyami

Correspondence: Dear Park Service people: save the elk! Adopt Alternative F now!

#7612

Name: Elke, Mary

Correspondence: Dear Park Service: Please restore Point Reyes Seashore for future generations. Please adopt Alternative F.

#7613

Name: Fried, Adrian

Correspondence: Please protect our beautiful elk!

#7614

Name: Hayes, Michael & Anna

Correspondence: We reside in Point Reyes Station and we support the adoption of Alternative F. We have been underwhelmed by the Park Service management. It is time to step up and focus on the mission and core values.

Let the land, wildlife and water...[rest of sentence illegible].

#7615

Name: Kerr, Scott

Correspondence: No on B. Yes on F.

#7616

Name: Lovitt, Ronald

Correspondence: Alternative F is by far the least intensive. Please adopt alternative F.

#7617

Name: Marasovia, Carole

Correspondence: I support Alternative F. Please do not contribute to the extinction of our American elk species. Adopt Alt. F.

#7618

Name: Morrison, Kevin

Correspondence: Please do the right thing! That means no killing. That means compassion.

#7619

Name: Naparst, Marilyn

Correspondence: Save the tule elk!! Point Reyes Natl Seashore; prioritize biodiversity and environmental health restore our coastal prairie habitat. Adopt alternative F now.

#7620

Name: Oda, Mayumi

Correspondence: blank postcard

#7621

Name: Price, Marilyn

Correspondence: To whom it may concern: I understand there is discussion of the NPS draft Plan for cattle ranching at Point Reyes National Seashore. I strongly encourage you to protect our environment and adopt Alternative F. Thank you for considering my request.

#7622

Name: Sebastian, Barbara

Correspondence: Please protect the tule elk

#7623

Name: Sprague, Stan

Correspondence: I am writing to you in support of preserving the habitat for tule elk at Point Reyes Park. I have seen these elk during hikes at Pt. Reyes, and I am happy they are there and I love seeing them and sharing that place with them.

#7624

Name: Strobel, Jeanine

Correspondence: Please, protect wildlife in Point Reyes. Protect the tule elk.