



United States Department of the Interior

NATIONAL PARK SERVICE

Point Reyes National Seashore
Point Reyes Station, California 94956

IN REPLY REFER TO:
L3019

July 24, 2009

David J. Lewis
Director
University of California Cooperative Extension - Marin
1682 Novato Blvd, Suite 150B
Novato, CA 94947
djllewis@ucdavis.edu

Dear David:

We have reviewed the *The Changing Role of Agriculture in Point Reyes National Seashore, June 2009*. In order to clarify how the Seashore supports agricultural ranchers within its borders, we are providing some general comments regarding the document and have attached some detailed comments. In addition, we would like to meet with you to address any concerns you have and establish a stronger working relationship.

1. The total amount of permitted agricultural land and changes to it over time are incorrectly described in the document. The National Seashore administered lands--Point Reyes NS and Golden Gate NRA north district--comprise 28,064 acres of permitted lands for beef and dairy ranching (22 operators; 34 permittees). Current permitted acres exceed the 24,687 acres zoned as pastoral in the 1980 approved General Management Plan (GMP) for Point Reyes National Seashore and Golden Gate National Recreation Area. The document's main thesis is that NPS has removed significant acreage from agricultural production within the pastoral zone, as defined by the 1980 GMP, and that this "threatens the critical mass of Marin's agricultural land" (page 16). From our perspective, grazing acreage in the park has remained relatively stable over the past 29 years.

Far from threatening the agricultural base of the entire county, the Seashore has lost agricultural land at a much slower rate than the rest of Marin, which, between 1990 and 2002, gained 2,522 urbanized acres at the expense of farmland and grazing land (California Dept of Conservation, 2004). Between 1992 and 2008, according to a statistics from the California Department of Conservation, over 400 grazed acres in Marin and almost 1200 acres of total agricultural land were converted to "Urban and Built Up Land"¹. None of this conversion was a result of NPS management. It is also clear in reviewing the county farmland mapping data that the highest risk of farmland loss is not within NPS lands but adjacent to fast growing urban centers, such as Novato and San Rafael.

2. Diversification --The NPS has discussed diversification with park ranchers. Types of diversification that the NPS has considered include small-scale, farm stay operations, small-scale vegetable crops located

¹ http://redirect.conservation.ca.gov/dlrp/fmmp/county_info_results.asp

within the ranch core, small-scale horse boarding, and value added operations located within existing buildings. Diversification is considered on a case-by-case basis in ranch plans, within the context of parkwide and ranch-specific resource management goals. The intent of diversification is to reduce income volatility, thus improving the capability of ranchers to achieve the highest standards of land stewardship.

To date, five ranchers have submitted requests to diversify operations and all of the requests have been approved. Diversification projects approved by the park range from a farm stay operation to small-scale production of chickens and eggs.

3. Lease length--In the past, the NPS has provided longer permit terms when appropriate to complete needed capital improvements, such as five-year permits with three renewal options for a total of 20 years. Except for ranches that required significant capital improvements, most of the permits issued in the recent past have been five-year permits, with a renewal option (in effect, a ten-year term). In the future, with new authority issued to the Pacific West Region from the NPS Washington Office, the NPS will offer a ten-year permit, with a five-year renewal option. We have attached information regarding permits from other agencies (Attachment 1). We believe our permits to be more advantageous for the permittee than those offered by either the private sector or other agencies. In addition, NPS grazing fees are significantly lower than those charged by other agencies. Current animal units rates in the park range from \$7 to \$9 per AUM compared to \$15 to 20 per AUM outside the park.

Regarding available grazing land, the NPS has a policy of making the lands available to adjacent permittees so they can improve their economic stability and undertake additional resource management projects. Land in the Pastoral Zone that has become available over the past 10 years has been used by adjacent ranchers and the opportunity for open bid has not arisen.

4. Capital Improvements--The document is incomplete in not acknowledging the NPS commitment to capital improvements made on pastoral lands with rancher support. Within the last ten years, the NPS has dedicated significant funding (over \$3.0 million) to addressing needed issues on ranchlands and has developed a trained Historic Preservation Team to work on ranch structures (see Attachment 2).

5. Resource Protection—It is unfortunate that nowhere in the document is the mission of the National Park Service described despite its overriding importance in determining the direction of NPS land management. NPS was created in 1916 to “to conserve the scenery and the natural and historic objects and the wild life therein.” The fundamental purpose of the NPS begins with a mandate to conserve park resources and values. Natural resource management, in both the pastoral and natural areas of the Seashore, is a complex and dynamic task, requiring the collection of scientific data, consultation with experts and the dedication of a staff of ecologists, physical scientists, wildlife biologists and botanists. Resource managers take advantage of the expertise held by the permittees and a full time Range Ecologist has worked in the park for the past 20 years, serving as a liaison between park staff and permittees in issues of mutual importance. Through its Range Management Program, the NPS has reinstated the monitoring of Residual Dry Matter (RDM) on ranchlands to ensure that ranch management is based on the best available current data.

The impacts of agriculture on native ecosystems are complex and the available published information on grazing effects to native flora and fauna is constantly being updated. Your document does not explore the documented complexity of grazing impacts. Some species clearly benefit from grazing while others are adversely affected. California coastal grasslands are complex and highly heterogeneous in time and space; consequently, responses to grazing or the removal of grazing are likely to vary from site to site and from year to year. The University of California has contributed significantly to the body of current knowledge on agricultural impacts and we look forward to cooperating in the future with U.C. rangeland researchers to strengthen the science needed to inform pastoral land management in the park.

6. NPS Approach--The Seashore and ranchers may have differing goals in management of the ranches, but we collaborate well to achieve both NPS resource management standards and ranch operational needs. Common ground always exists in the desire of all parties to maintain and enhance the long-term health and productivity of the land. This collaboration is a product of the unique skills and knowledge of ranchers and NPS staff, brought together to complete projects that would not be possible for either party separately. Areas of particular interest for collaboration, and not mentioned in the document, have included: water quality, archaeological site preservation, ranch diversification, weed management, historic structure and landscape maintenance, ecologically sound agricultural practices, habitat restoration and biological diversity. The Seashore recognizes the importance of open communication with permittees. Since 2008, the annual park-rancher meeting has been reinstated and provides a forum for discussing challenges, changes in legal requirements and areas of common concern.

We do hope these and the following comments are useful in clarifying how the park supports ranchers in the park. We have limited our comments to the most important issues, but would be happy to review document details in a meeting if you wish.

Sincerely,

A handwritten signature in black ink, reading "Don L. Neubacher". The signature is written in a cursive, flowing style with a long horizontal tail on the final letter.

Don L. Neubacher
Superintendent

Specific comments on *The Changing Role of Agriculture in Point Reyes National Seashore, June 2009*

Page 2, Paragraph 5.

"Now, with most native grazers extinct. . ." Most native grazers are present in the park. Tule elk are more restricted in distribution than historically, but native deer, rabbits, etc. are all present.

There is an assumption being made here that woody species are invading areas that were historically grassland but no data to support this claim is referenced. Since phytolith studies have not been conducted in areas where conversion to shrub/woodland could occur and we don't have historic maps of lands that were cleared of woody vegetation previous to establishment of the Seashore, it cannot be assumed that invasion by woody species into these areas, after removal of grazing, is not a reversion to historic conditions.

Page 3, Paragraph 4.

This paragraph implies that PRNS is not supportive of the ranch families and yet provides incomplete information. There is no information provided on current animal units rates in the park (\$7-\$9/AUM) compared to those outside the park (\$15-20/AUM). Also absent is any information on the funds the NPS has provided to improving the ranch operations. Finally, there is no discussion of the nomination by NPS of the two historic ranch districts to the National Register for preservation as "working landscapes."

Page 4, Paragraph 5.

The literature seems to be selectively referenced here. Hayes and Holl (2003) do state that annual forbs can benefit from grazing. However, Hayes and Holl also state that, in their study, cover and species richness of native perennial forbs were higher in ungrazed sites. The coastal prairie of PRNS is a perennial system which includes a variety of perennial grasses and forbs and many of our rare plant species are perennial forbs that could be adversely affected by grazing. There are some native annual forbs and annual grasses that naturally occur in the coastal prairie. NPS is required to manage for the conservation of all rare plant populations. Healthy native coastal prairie occurs in both grazed and ungrazed areas.

Page 4, Paragraph 6.

"In all cases though, grazing has proven compatible with preservation of the special status species found at PRNS and listed in Table 1." This sentence is contradicted by both the previous sentence ("some special-status species") and the 5th paragraph on page 5 (Beach layia and Tidestrom's lupine....do not appear to be dependent on grazing...."). Table 1 lists only some of the special status species present in the Seashore.

Page 6, Paragraph 2.

The relationship between grazing and Myrtle's silverspot butterfly, as documented in the literature and Seashore databases, is unclear at best. The finding of more butterflies in grazed areas does not confirm causality, e.g. that grazing is beneficial for butterflies. It is conceivable that in the absence of grazing there might be even more butterflies in those same areas. The most extensive research on Myrtle's silverspot was conducted by Launer, Murphy, Hoekstra, and Sparrow (1992). Any discussion of Myrtle's silverspot butterflies at PRNS would be incomplete without reference to this paper.

Page 6, Paragraph 3.

Again, a claim is being made that two co-occurring events have a cause-and-effect relationship. "Of these frog locations, only one is in an area where livestock are excluded (NPS 2001)." The document is repeating one of the most basic statistical fallacies, that correlation proves causation. While data indicate that there are significant California red-legged frog (CRLF) populations in pastoral areas of the Seashore, their presence in grazed areas does not prove that grazing is beneficial to frogs (see the Myrtle's silverspot butterfly discussion above). What is documented to be beneficial for frogs is ponded water. The pastoral zone has more ponded water than other parts of the park, in part because of its flatter topography. It should be noted that in addition to stock ponds, CRLF also inhabit marshes.

Dr. Fellers, a research biologist with U.S. Geological Survey-Biological Resources Division, has conducted frog sampling outside of grazed lands and identified CRLF in many non-grazed areas of the Seashore. Fellers and Osbourne (2004) visited 98 sites in ungrazed wilderness or natural lands including: 13 sites on Tomales Point, 14 sites on Mt. Vision, 16 sites at Limantour and Glenbrook, 32 sag ponds in the Olema Valley, and 23 sites in the southern wilderness lands. The report documented California red-legged frogs at one of the 13 sites on Tomales Point, 10 of the 14 Mount Vision sites, 14 of the 16 Glenbrook and Limantour sites, seven of the 32 Rift Zone sites, and 12 of the 23 southern wilderness sites.

Page 13, Figure 1.

This figure appears inaccurate.

D Ranch – incorrectly illustrated as “Agriculture removed”. Approximately two-thirds of D ranch continues to be used for agriculture, with 2 different permittees using these areas.

K and J Ranches – incorrectly drawn as strips of land along the coast. These permitted sections extend significantly eastward to Tomales Bay.

New Albion Ranch – incorrectly illustrated as “Agriculture removed” is actually Congressionally-designated Wilderness, The creation of wilderness was an act of Congress, not PRNS, and should be acknowledged as such.

Lupton Ranch - incorrectly illustrated as “Agriculture removed”. Most of this area is currently grazed by an adjacent permittee.

We believe the depiction of forested area to be inaccurate; we have attached a 1983-updated USGS topographic map that shows the extent of forest (Attachment 3). It is unclear where the forest layer in Figure 1 came from.

Page 14, Paragraph 3.

“Since its inception, PRNS has taken more than 18,000 acres of ranchland out of ranching, including thousands of acres within the Pastoral Zone (Figure 1).” This statement is inaccurate, as is Figure 1. We believe that only a fraction of the “thousands” of acres in the Pastoral Zone have been removed from active ranching. In addition, since 1980, 3,377 acres outside of the Pastoral Zone have been continued.

Page 17, Paragraph 4.

“Removal of PRNS lands from agricultural use over the years has chipped away at Marin’s critical mass of agricultural land, affecting all of Marin agriculture.” As mentioned in our general and specific comments above, this statement is based on inaccurate land use data. Contrary to this statement, the NPS has gone beyond the pastoral zoning direction of the 1980 General Management Plan and continues more than 3,000 acres of permitted grazing in the park, outside of the Pastoral Zone. Grazing acreage in the park has remained relatively stable over the past 29 years.

Attachment 1: Information on Agency Grazing Leases

US Forest Service – Department of Agriculture

10 year term for domestic livestock grazing on public lands. 43 CFR 1752

BLM – Department of the Interior

10 year term for domestic livestock grazing on public lands. 43 CFR 4130.2

Law suit regarding compliance, currently only 3 year renewals while complete EA for permits. Charge by AUM \$1.79 Forest Service rate (Pardee Bardwell (sp), Range Ukiah (707) 468-4055.

US Fish and Wildlife Service – Department of the Interior

Mostly annual special use permits. Used as a management tool on refuges with closely monitored prescription. Factor compatibility with public uses. Charge by AUM based on local rates in the county. Guided by Comprehensive Conservation Plan or Habitat Management Plan. Charged by AUM \$10.86 FWS rate (Eva Kristofik, Hopper Mtn NWR (661) 343-3332

Bill Groverman, Redwood Empire Appraisal (707) 763-2772

Grazing leases for pastures are mostly annual with some month to month. Dairies can run longer, especially if capital improvements made. Grazing leases over one year are rare in the private sector as owners wish to retain flexibility.

San Francisco Public Utilities Commission

5 year grazing leases at \$17.25 per AUM. Guided by Domestic Livestock Grazing on the San Francisco Public Utilities Commission Watershed Lands and the Grazing Resource Management Plan. (Tim Koopman, SFPUC (925) 862-5509)

East Bay Municipal Utility District

5 year grazing leases with up to 50% reimbursable rent for capital improvements at \$22.50 per AUM. Guided by Range Resource Management Plan. (Rodney Tripp, EBMUD (510) 287-2022)

East Bay Regional Parks

Month to month leasing planning to go to 5 year Grazing License at \$18.15 per AUM. (David Amme, East Bay Regional Parks (510) 544-6141)

Attachment 2: Summary of PRNS support to park ranching

Point Reyes National Seashore Cooperative Work with Ranchers

Ranching has been going on in Point Reyes since the mid-1800's and of the many resources found within the National Seashore, the historic ranches of Olema Valley and the Point are some of the most characteristic features of this beautiful landscape. In preserving this important piece of our nation heritage, National Park staff work closely with ranchers on a variety of issues, from protecting natural resources like federally-listed plant or animal species, to repairing historic ranch buildings and making range improvements to keep our dairy and beef operations up-to-date and viable.

Range Management - \$635,000

- Provide funding and oversight for the construction of water quality BMP's.
- Assist with water development projects to protect park resources and provide water for cattle.
- Assist with the design of NRCS EQIP projects for range improvements, conduct NEPA review and assist with implementation.
- Control invasive weeds in pasture
- Collaborate with ranchers to develop new approaches to ranch management and to determine future needs, then pursue outside funding to implement improvements
- Coordinate range improvement projects with ranchers, NRCS, Marin RCD and State funding
- For the period between 2006 and 2008, we have been implementing BMP's and monitoring pre- and post-water quality monitoring on ranches that drain to Tomales Bay Watershed with \$350,000 from RWQCB and \$200,000 match from PRNS
- Coordinating with Bill Niman to make range improvements to significantly reduce pollutants being delivered to Duxbury Reef ASBS.
- Coordinate with Coastal Conservancy and Ranchers in the Tomales Bay Watershed to implement BMP's to reduce non-point source runoff: \$85,000 for 2008 and are currently developing the 2009 projects (major improvements on Giacomini and Lupton Ranches).

Infrastructure - 10-year investment of \$1,115,000

Home Ranch Sewer (2004-06) <i>All design, construction some pumping</i>	\$255,355
Drakes Beach Water System (2002-06) <i>50% of all water is delivered to B&C Ranches. Chlorination bldg., distribution, tank mod</i>	\$282,650
A Ranch Wastewater (2007) <i>Purchase materials, electrical work, pumping for three months</i>	\$70,000
C Ranch Wastewater (2009) <i>All design, construction some pumping</i>	\$240,000
Cheda Ranch Road (2006) <i>McIssac grazing access (Storm 06)</i>	\$69,322
Home Ranch (2006) <i>Road, wastewater pumping, house damage, excavate creek (Storm 06)</i>	\$51,056
Home Ranch (2007) <i>Line Item Coastal Watershed project: Replace culvert, dredge creek, water & electrical</i>	\$141,043
Stewarts Ranch & Horsecamp	Deliver water - ongoing basis
L Ranch Road	Grade 3 times per year

Historic Structures – 10-year investment of \$1,327,000

125 projects ranch structures, including rehabilitation and stabilization projects, assisting ranch hands with repairs, training in simple preservation treatments (i.e. installing wood shingles)

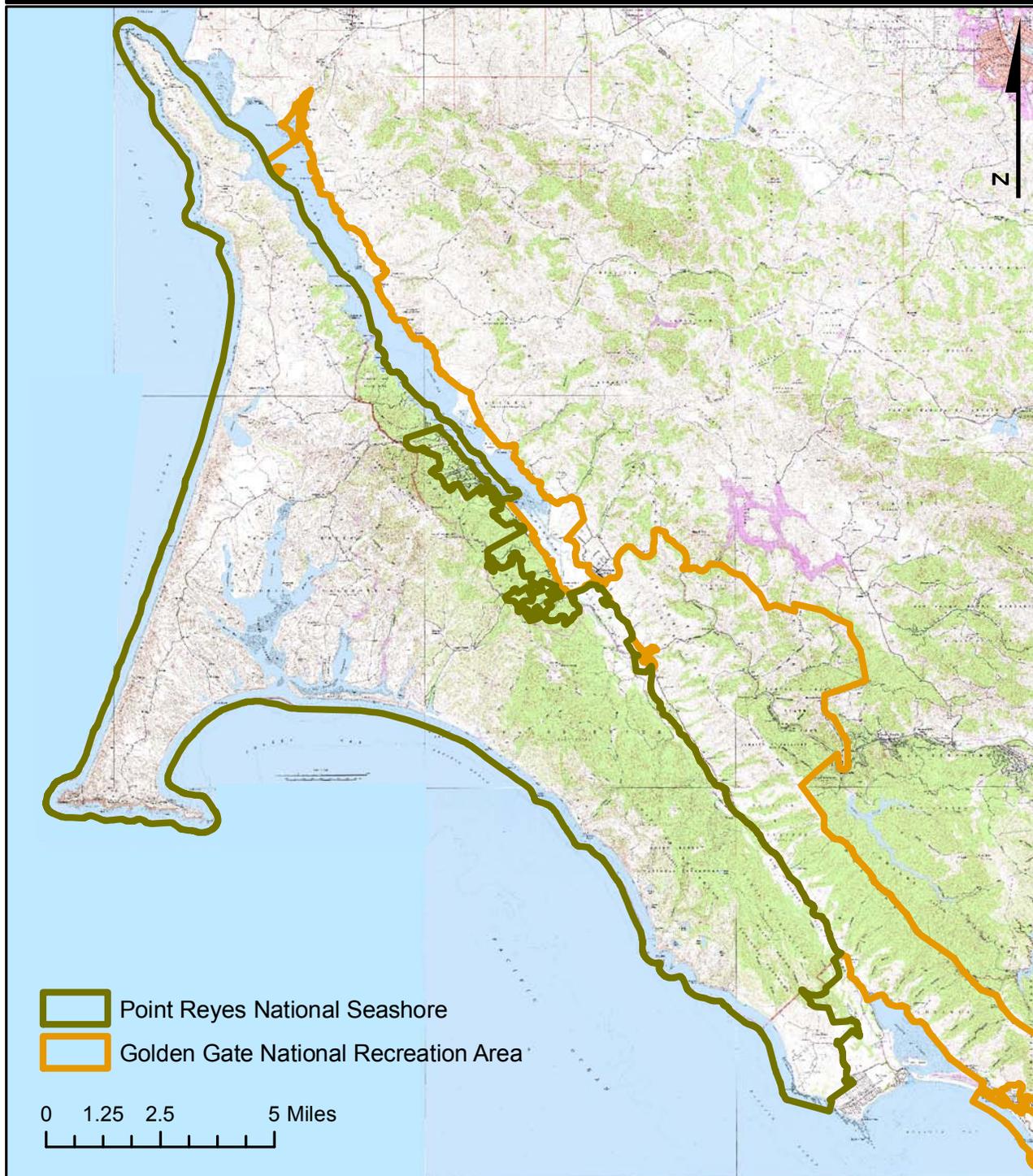
Seashore Historic Preservation Crew works collaboratively with ranchers to repair ranch buildings, find appropriate materials, and strategize repairs.

Preservation Crew maintains excellent relations with ranchers, are called often for assistance.

TOTAL Over \$3.0 million

Attachment 3: 1983 updated USGS topographic map of Point Reyes National Seashore, showing forested areas (solid green) and shrubland (stippled green)

Point Reyes National Seashore NPS Boundaries & USGS 7.5 minute Topographic Maps



Map generated from the USGS Topographic Quads: Bolinas, Double Point, Drakes Bay, Inverness, Petaluma, Point Reyes, San Geronimo & Tomales.

Digital Raster Graphics used in this map represent a range of publication dates as issued by the USGS.

Boundary data is current to April 2009 and is compiled from best available parcel boundaries provided by Marin County and existing surveys.

Joseph Kinyon, Pacific Coast Science & Learning Center, July 2009, UTM Zone 10 North, NAD 83