



Protecting Marin Since 1934

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 League's mission since 1934 is to preserve, protect, and enhance Marin's natural assets. In 2015, MCL approved its Agricultural Policy Statement (attached) which includes the following stated goal:

“To continue to support the role Marin's 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 MCL's previous positions and actions regarding agriculture and our mission to conserve Marin's 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

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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 structur-

ing 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., Johne’s 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 visitor’s 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, NPS’s 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 NPS’s 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 NPS's "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 Marin's 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/GGNRA 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

Attachments: Marin Conservation League Agricultural Policy Statement