

Point Reyes National Seashore
General Management Plan Amendment
Public Scoping Correspondence
April 2019

#1

Name: Wall, John

Correspondence: I would prefer the Limited or No Ranching alternatives. To devote about a third (27,000 acres) of the park's land (71,000 acres) to ranching seems like poor use of a National Park. Who wants to drive behind large hay trucks on poorly maintained roads through nearly denuded pasture? If ranching is to continue, the park should at the very least repair and widen the roads, and provide safe pull-outs where park visitors could take in the landscape and observe wildlife such as coyotes, bobcats and badgers.

#2

Name: Young, Scott

Correspondence: I prefer National Parks that are owned by all USA citizens be for wildlife, natural-nature and low-impact national & international visitors. I do NOT want the miles of unsightly barbed-wire for-profit cattle ranches that smash natural vegetation, create polluting poo-ponds and pee-creeks that are always openly or secretly harming our treasured National Parks.

#3

Name: Meral, Gerald

Correspondence: Please make this letter part of the official record regarding the preparation of the GMP amendment. Here are several things to consider in preparing the ranch plan. 1. The spread of weeds into the Seashore should not be made worse by the importation of livestock feed that contains weed seeds. Ranchers should be required to purchase only feed that is free of weed seeds. Any seed imported into the Seashore should also be free of weed seeds. 2. Marshall Beach Road is the only unpaved road that is frequently used by both the public (to access Marshall Beach) and ranchers (L Ranch). That road is frequently a washboarded mess until the L Ranch turnoff due to heavy use by milk trucks. The Ranch Plan should include paving the Marshall Beach Road at least to the L Ranch turnoff to prevent erosion and degradation of water quality, and a diminished visitor experience. 3. The Plan must include specific compliance with the migratory bird treaty act. The Plan should prohibit mowing of silage and other crop harvesting until the end of bird nesting season, or at least require a survey of prospective mowing sites for nesting birds before mowing. If birds are nesting, mowing must be postponed. For example, in recent years mowing near Abbott's Lagoon for silage resulted in the destruction of nests of a colony of grasshopper sparrows. This is a species of concern in California, and is migratory throughout North America, so it is covered by the migratory bird treaty act. 4. The amount of cultivation in the Seashore in a given year should be limited. Ranchers should not be allowed unlimited cultivation. An overall acreage should be determined, limiting impacts to native species. The allocated acreage would then be distributed to ranchers who wish to undertake cultivation. 5. One element that should be considered in all options is gasification of manure from dairies. The present practice of spreading it in fields may cause several bad effects: Odor problems in the Seashore, over Tomales Bay, and in residential neighborhoods near the Seashore Disruption of the ecology of the fields, including impacts on migratory birds protected by the migratory bird treaty act Water quality degradation of Abbotts Lagoon, Kehoe Creek, nearshore coastal waters and other wetlands and waters of the Seashore. Visitors in the pastoral zone are forced to wade through cow manure if they want to walk the fields. 6. No diversification into field or vegetable crops should be allowed. Only crops needed for ranch or dairy purposes should be allowed. Thank you for considering these requests. I look forward to reading the Park's response in

forthcoming documents. Please be sure our organization is on the list of parties to receive all documents relating to the Ranch Plan. Best regards,

Jerry Meral, Ph.D. Director, California Water Program, Natural Heritage Institute

#4

Name: N/A, N/A

Correspondence: I had the pleasure of visiting your park this year. I remember thinking how it was a shame to have these cattle operations along the seashore, what an eye-sore. Using 28,000 acres of national park for ranching even sounds plain ridiculous. I understand it's part of important cultural history of the area, but think of the visitor. Our national parks are for the protection of resources contained within, and for the enrichment of the visitor by enjoying these special places. Undeveloped California coast is irreplaceable. Visitors come for sweeping views of natural, gorgeous coastline, not to see and smell cattle. For these reasons, I see alternative F as the only option. This would expand habitat for native plants and animals, increase connectivity, and allow for more recreation opportunities for visitors.

Thank you for considering my opinion and good luck with the decision making.

#5

Name: Van Soelen, Philip

Correspondence: I urge the "No Ranching and Expansion of Tule Elk in the Planning Area" be taken for the Point Reyes Planning Area.

#6

Name: N/A, N/A

Correspondence: I respect and appreciate the many families that have been ranching in the area for many years.

However, the amount of private ranching taking place is largely incompatible with public access and enjoyment of NPS property. Very large areas are fenced off from public access.

The ranching areas were sold and the operations have been taking place under lease agreements without any guarantees of renewal.

The purposes of the National Park Service would be best served by reducing the amount of ranching, and providing more public access to public lands. Reduced ranching would also allow more habitat restoration.

The NPS is not in the primary business of public leasing lands for private ranching. The NPS should open more public space to public uses. The NPS could dramatically expand the amount of hiking trails available to the public, and could add more picnic and camping areas.

#7

Name: Ferris, Jonathan

Correspondence: Preservation and potential expansion of the Tule Elk herds is preferable to ranching. Ranching for meat and dairy is unsustainable and a burden on the environment. I am in favor of Alternative F to remove ranching from Point Reyes NS, but am willing to accept Alternatives E and A as well. While the Tule Elk are not listed as endangered species they should be and should not be limited or removed from this park service unit. The National Park Service should not be allow new or enlarged ranching in this unit. Thank you.

#8

Name: Stradley, Bruce

Correspondence: This project was intended to save this subspecies not the income of humans. It will cost millions to try to change. That money could be used for conservation. Perfect Oregon would be interested because taking a few for establishment there. Or a high priced trophy tad could be used. We almost destroyed them once, let us not follow that selfish path again. I am a hunter and have had the honor of harvesting the Rocky mountain subspecies. Though as I have aged they are the winner

#9

Name: Schickman, Jonathan

Correspondence: If we review recently scientific headlines we see things like

"Humans caused 60% wildlife population drop from 1970-2014"

&

"Meat and dairy industry on track to surpass oil companies as biggest greenhouse gas emitters"

One could go on and on.

In light of this it is ludicrous that the National Parks service would consider increases in cattle ranching in Point Reyes & and even more obscured that they would kill off an the native threatened Elk to do so.

If anything logic would dictate a move in the opposite direction should be in order. Less cattle & more Elk. As it is this is a miniscule sliver of their homes they should be allowed to at least flourish on this little peninsula.

#10

Name: Martak, Michael

Correspondence: Please do what you can to keep the elk population from dwindling. I'd rather see the cattle ranchers evicted than the elk.

#11

Name: Coy, Hal

Correspondence: I am in favor of option F. This is what's wrong with park management. Hunting grizzly bears in Yellowstone, any killing of the Tule Elk for farmers. What happens when we kill off all of the animal kingdom?

Oh...still haven't forgot how the NPS mismanaged the Elk Herd and many of them die of thirst because they were fenced in. I called in to voice my displeasure and was comforted by a professional "handler" and was told the woman in charge was on vacation because of the public outrage. (=transferred to another area with a salary increase.)

#12

Name: Cooper, Richard

Correspondence: The continued presence of the historic dairy farms at Point Reyes is compatible with the aims of creating the National Seashore, as long as they are maintained at their current level and not expanded at the expense of the tule elk.

It should be pointed out that an important objective of the creation of the national seashore, if not the primary mission, was the protection of the elk herd.

Expansion of the farming areas, to include in addition to dairy cattle, the possible husbandry of chickens, is not only irresponsible, it is absurd!

Seeing the magnificent elk is part of what makes visiting Point Reyes such a beautiful experience. Seeing dairy cattle does not detract from the experience, but chickens? Is this some sick joke? Visitors are going to flock to the park to see...chickens?

#13

Name: Ellis, Ethan

Correspondence: I'm a regular visitor to and former nps volunteer at Point Reyes ns. Please don't remove or cull the Tule Elk. This is a species relegated to a few small spread out reservations, they should be protected in the handful of sites where they still exist. I support doing nothing about this elk population situation or alternatively, although less enthusiastically, support moving the excess population to another site. I am strongly against any cull to the population. And I find it obscene that the culling would even be considered if the option to move some individual animals is on the table.

#14

Name: Tillmar, Arvid

Correspondence: Leave the elk alone.killing them would be the height of arrogance.what does RMEF SAY?

#15

Name: N/A, N/A

Correspondence: I was devastated to hear about the potential limiting of the elk in order to help farmers. Surely a national seashore is not a place where commercial business should take precedence over wildlife preservation.

#16

Name: Gibson, Stuart

Correspondence: I am a long time and frequent visitor to Point Reyes Nat. Seashore. I feel very strongly that the park service should find a way to allow some Elk to continue living in the park. It is totally unacceptable to remove or kill all of them. As stated in the Chronicle article, there are a lot of park visitors who come specifically to see the elk. You have a duty to serve your visitors interests above all else. It's their land, after all!

#17

Name: Browne, Tom

Correspondence: Just wanted to suggest that the farms be scaled back in number and size to limit their impact on the Tule Elk herds.

#18

Name: Martin, Morea

Correspondence: This is yet another way that commercial financial gain is taking priority over the environment. There are risks associated with every industry, and in this instance, a few elk eating the grass the cows eat should not allow the slaughter of a native fauna. I find it repulsive that ag demands are allowing this carnage to insue . Please rethink the population cap on native elk in the region. They deserve to live and flourish here. Cattle farming has made a serious impact on our lands, and I hope you respond to these Farmers with respect to our ecosystem. Thank you

#19

Name: N/A, N/A

Correspondence: It is completely absurd that the NPS is considering expanding ranching operations at the Point Reyes National Seashore at the expense of the tule elk herd. The thousands of visitors who come to the park don't come to see cows and chickens. They come to get a glimpse of the natural beauty at the seashore, including the roaming elk. The NPS should strongly reconsider its proposed action and instead work to draw down ranching operations at Pt. Reyes. The National Seashore should not be used to benefit a handful of ranching families. It should be used 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." I'm quite sure I read that somewhere.

#20

Name: Sandholdt, Kim

Correspondence: I believe that the park service needs to carefully manage the Tule Elk, and not exterminate. There are not so many elk that the ranchers should feel impacted. It is a poor excuse. If the population needs to be managed then it should be through sterilization. Please do not make the mistake you did with the Axis and Fallow deer and have White Buffalo sneak in during the night and shoot the animals down. We made decisions years ago to incorporate these animals into the area. They have thrived and we need to embrace that instead of destroy it. Any population control should be managed not by extermination, but sterilization. Please do not kill these creatures. They are incredible and magnificent, and unique. The residents and public love seeing and hearing them. There is enough for all, ranchers and the elk, if it is managed correctly, by you. Thank you, Kim Sandholdt

#21

Name: Harmon, Benjamin

Correspondence: The USDA estimates that over 740,000,000 acres of public and private land in the US is used by livestock - mostly cows (<https://www.ers.usda.gov/amber-waves/2012/march/data-feature-how-is-land-used/>) Meanwhile the last visible herd of Tule elk occupy a tiny portion of the California coast, all of which is in Pt. Reyes.

Follow the money. Ranching is a purely for-profit activity. Arguments about providing an education to visitors about ranching are manipulative and absurd. Visitors can get an education about ranching almost anywhere in the country. There is nothing special about Pt. Reyes that makes it a compelling place to provide this exposure.

The fact that anyone is considering sacrificing 300 elk for yet more cows is just sickening.

#22

Name: Hall, Chester

Correspondence: I visit Pt. Reyes National Seashore to spend time in nature. The elk are definitely an attraction.

I am for leaving things the way they are and against increasing the amount of "for profit" agricultural and ranching use.

Please keep the park public and do not increase the amount of private and for-profit use.

There are other options besides the park for locating chicken ranches. The smell will ruin the experience of the park.

If you want to control the elk population, introduce more predators like wolves. Of course that will not fly with the ranchers, but there are documented cases where wolf populations and sheep ranchers co-exist in the U.S.

Citizens like me spend money on airfare, car rentals, lodging, food and tours. The park generates revenues for airlines, car rental agencies and local businesses in towns like Olema and Pt. Reyes Station. When the park becomes less attractive, those revenues will be lost.

Thank you.

#23

Name: Lunday, Jeffrey

Correspondence: It's important to keep the native wildlife in their own environment. Although agriculture is very important, but so retaining the natural resources too. If push comes to shove, please consider relocation over mass killing or sterilization. I know that Fort Riley, Ks is rebuilding an elk herd and I'm sure there are others. Since there is a sacrifice being made at the elk's expense, those intending on expansion should be in guidelines of operations. Those seeking more land for agriculture operations should share the expense of removal of the elk herd to other locations. Thank you, Jeff

#24

Name: Frank, Laurence

Correspondence: I am a wildlife biologist and have no problem with rational management of animal populations. However, I have always opposed the continuing existence of cattle ranches on Pt. Reyes, as livestock production is simply not compatible with the basic remit of the NPS, preservation and restoration of natural systems. The Drakes Bay Oyster Farm was forced out of business in spite of doing essentially zero environmental damage, while the ranches are allowed to continue, completely destroying the natural vegetation, pouring millions of gallons of cattle sewage onto the land and into the streams and ocean, and displacing the native wildlife. It is absurd to now add small stock and chickens, which will, of course, lead to predator control (legal and illegal) and even more environmental damage.

End the ranch leases and manage Pt. Reyes as a true national park, not a livestock production zone. Allow elk and deer to increase to carrying capacity, and then if mountain lions and coyotes cannot keep up with ungulate numbers, cull them. This works at Grizzly Island and other state managed natural areas and is far more in keeping with National Park Service priorities than is beef and milk production.

#25

Name: Perkins, TIM

Correspondence: Relocate the elk to the North West Georgia mountains. These mountains were once home to elk and the woodland buffalo (which are now extinct).

#26

Name: Mckinnon, CHRISTY

Correspondence: Please do not support the removal, genocide, or sterilization of the Point Reyes Elk in favor of agriculture. Please focus instead upon alternatives that will preserve a healthy elk population, support local farm operations and the community and continue responsible stewardship of the public lands so kept intact for future generations.

#27

Name: N/A, N/A

Correspondence: Point Reyes needs to remove all ranching. We visit constantly visit Point Reyes and the ranches are not an attraction. The wilderness is what the NPS should be attempting to preserve. The tule elk are part of that wilderness and must be protected, not removed or relocated.

#28

Name: N/A, N/A

Correspondence: I'd like to note my support for the farmers and ranchers inside and outside of the park system.
Thanks

#29

Name: Toriello, Frank

Correspondence: I have often visited the Point Reyes National Seashore especially when I was a resident in the Bay Area. The elk at Tomales Point are magnificent and deserve to be protected. Given the loss of sixty percent of the global animal population since 1970, it behooves us to do what we can to protect and preserve what animal populations exist. The world will be a sorrier place with the continued loss of the earth's creatures. I don't want the world to end up like "Soylent Green". Choosing chickens over elk is absolutely absurd to me. At least choose to move the elk to other locations if that is the best you can come up with. There will come a time when the push for more profit must end. Today would be a good day to say enough given all we are facing with global warming and now even this absurdity. We need to stop the continual incremental degradation of the Earth.

Sincerely, Frank Toriello

#30

Name: Schmidt, John

Correspondence: GMP Amendment c/o Superintendent Point Reyes National Seashore 1 Bear Valley Road Point Reyes Station, CA 94956

Please accept my comments regarding the Environmental Impact Statement for the Draft Management Plan at Point Reyes National Seashore and the North District of Golden Gate National Recreation Area.

National Park lands should be managed to preserve and protect their native plant and wildlife communities as well as their natural beauty, first and foremost.

In my view, all grazing operations should be eliminated from all NPS lands. I'm alarmed that in this case sustaining grazing operations above all else appears to be the NPS's primary concern, in spite of the fact that grazing operations were supposed to have been phased out here. Private dairy and beef livestock operations agreed to and accepted millions of dollars of tax-payer funded buy-outs of their grazing leases many years ago. Generous life-leases were offered to ranches to give them plenty of time to find new lands to ranch. That time is up, yet the NPS now wants to renew these ranch leases for 20 years and disregard these prior life-lease agreements? What was the purpose of these million dollar buy-outs then? And how is this not a complete waste of taxpayer money? I remind the NPS that sustaining private ranching operations should not be your primary goal here. And going back on previous commitments sets a dangerous precedent for all National Parks.

Regarding Tule elk, the NPS outrageously proposes that these native, free-roaming elk in the Drakes Beach area be managed to keep them from interacting with cattle ranching. Elk would be "hazed" out of cattle pastures, or "lethal methods" used. These elk were released into the Philip Burton Wilderness inside Point Reyes National Seashore in order to restore the park to a native condition. Restoration of native species is a National Park Service mandate. Elk are native here, cattle are not. What NPS is proposing here regarding elk is completely unacceptable. NPS should honor its decades old promise to remove the cows. After all, US taxpayers have spent millions to achieve that goal.

Cattle grazing is not compatible with native plant communities and wildlife populations anywhere. Cattle spread invasive non-native weeds, and eliminate native plant communities and wetlands due to overgrazing, erosion, and improper manure management. Water quality is adversely impacted. All this is happening on these National Park Service lands that you're charged with administering on behalf of all US citizens.

Options in the amendment might allow 'diversification' of for-profit activities on National Park Service lands including growing alternative farm crops, increased poultry farming on park lands, and adding sheep and goats, as well as other other alternatives. One has to ask what is going on there? Are US taxpayers paying for you to manage a National Park Service unit or to run a livestock operation?

Johne's Disease is a highly contagious digestive disease in cattle that spreads through manure and contaminated water. Some elk in the Seashore have Johne's disease. Adding goats and sheep will compound the problem of disease transmission.

I urge the NPS to choose an alternative that honors the decades-long commitment to phase out livestock operations and manage these lands for the benefit of their natural plant and animal communities.

Regards, John Schmidt

#31

Name: Knight, Kelly

Correspondence: Please preserve the elk at Point Reyes! I recognize that agriculture is important too, but our reliance on beef is already problematic in the broader context of global warming. The Tulle Elk faced extinction, and I know that farmers were supporting nearly half a century ago, but basing decisions on what happened a long time ago isn't great when current problems are not also taken into account. I'm not against meat (I eat it), but I also think that there are other places to put farms, or farm meat more sustainably. And our reliance on cattle above other species is the wrong move. Plus, the elk provide a unique draw to the park for families and tourists. My family loves going to see them.

Thank you for considering this.

#32

Name: Stechschulte, Brian

Correspondence: As a regular visitor to Point Reyes National Seashore, I believe it's important to maintain a balance between the preservation of agricultural history, and the needs and protection of native wildlife and their environment. I've enjoyed this balance and hope to see it continue, but I'm very concerned to read and hear about proposals for ranch diversification, beyond dairy, into chickens for example. I'm adamantly opposed to this type of ranch expansion and believe it will establish new priorities and precedents that will upset the current balance of wildlife and ranch preservation.

#33

Name: Lehman, Ann

Correspondence: Tule Elk millions of visitors is a great combination for both people and the land, Where else can they be viewed, where else are there such magnificent animals right in our back yard? It is GOOD for people to see such a wild animal.

Cows fewer visitors is a lousy combination for both people and the land. If I never see another cow, never step on another cow pie, I will chalk it up as at least #5 on my Never Chart. The cow is far from a magnificent animal!!

#34

Name: N/A, N/A

Correspondence: 1. Please communicate and clarify in the report:

What rules or policies are in place, if any, to allow and manage an Increase in the number of ranching leases (or amount of leased land) over time?

What rules or policies are in place, if any, to allow and manage a Decrease in the number of ranching leases (or amount of leased land) over time?

For example: If a lease holder retires from their business, does someone else in the family or business automatically get preference to renew the lease? Are leases automatically renewed with the current rancher if the rancher wants to renew? Are requests to add more leases considered (more land, or splitting one lease into two...), or is the number of available leases permanently fixed at the current level? If a rancher chooses to not renew the lease or can no longer pay the lease amount, is the lease automatically opened up to allow other ranchers to apply? If so, what criteria is used to choose a new rancher? Etc.

2. Consider adding to the report a proposed attrition policy for discussion: The park could identify which ranching parcels offer the best options to be converted to park visitor benefits in the future, like camping or classrooms. Then establish a policy that allows for potential non-renewal of the leases for those parcels should the current lease holders ever opt out of renewing their leases.

If it's the case that ranchers never opt out of renewing, for generations, because they have some kind of non-transferable guarantee to be allowed to renew forever, can another path be added to make attrition a viable option for lease holders who would actually prefer to not renew but can't justify walking away from the right to renew? i.e. a lease holder could receive a benefit (monetary?) if they choose to not renew?

#35

Name: N/A, N/A

Correspondence: Please add my voice to those favoring native elk over cattle grazing in this National Seashore. I support the "No Ranching" or, as a second choice, "Reduced Ranching" options. - The highest and best use of this land is for conservation of native wildlife and habitat. There is an abundance of grazing land available in this state, but the Point Reyes peninsula is unique. - Privatized ranching inside a natural seashore violates the spirit and intent of the enabling laws. - There is no reason to continue land-use mistakes begun in the 1800s, when the economy, population, values, and ecological health of California were all much different. - If promoting organic agriculture is seen as a worthy goal then efforts to promote it should be focused on the existing vast areas of agricultural land in California.

Thank you for considering my comments.

#36

Name: Dubinett, Laura

Correspondence: PLEASE DON'T KILL THE TULE ELK!!

I have been hiking Marin for almost 30 years and have hiked through the Tule Elk grazing areas. I'm awed by their majestic presence and the fact that they've flourished after being nearly extinct. I think it would be a horrible mistake to kill them. Since they have not yet reached their population limit, I would suggest sterilization now, building more fences and maybe relocating the excess elk to Native American land, or other land where they would not be directly competing with dairy farming.

I understand the need to support organic farming in Marin, but killing the Tule Elk is not the answer. Thank you for reading this.

Laura Dubinett

#37

Name: Lang, Louise

Correspondence: More men with guns? Haven't we had enough shooters for this century? Is this California? Sounds like a NRA nightmare or a political joke. You should feel shame. This is 2018: sterilization, birth control, relocation, not guns.

#38

Name: Q, Pamela

Correspondence: There should be no ranching on public land. These National Parks belong to the people and should be preserved as such. It's bad enough that they free load on the land but, then they begin to feel entitled and feel that they have more right to be there than our wild life. I wish more people realized what was going on. I'm sure there would be nation wide outrage. I would like to leave my name and address but I don't want to be harassed by rabid ranchers. Thanks for letting me vent. I hope it makes a difference.

#39

Name: Fuller, Kate

Correspondence: I lived most of my adult life in the Bay Area and visited Point Reyes very often. I'm appalled at the Park Service joining up with greedy ranchers to further alter that land which should be kept as pristine as possible. The Elk Need Land. Killing them off is not what the original plan called for. This is simply not acceptable: "any plan to thin the herd would require the massive animals to be taken somewhere else or killed." The Park Service has land and options. Make more room for the elk. Tell the ranchers, who soak up public monies and overuse fragile habitat like the Point Reyes Peninsula to curb their rapacious desires. Chicken farms in this incredibly precious landscape? NO! This is NOT acceptable.

#40

Name: Hsieh, Frances

Correspondence: Do Not kill elks! Leave them there or relocate them.

#41

Name: Patten, Leslie

Correspondence: I lived in Marin County for over 40 years and I was born in California. Now I live in Wyoming but I am very familiar with issues in Point Reyes having lived in the area for most of my life. Culling elk on Park lands because they share lands with cattle?!?! Outrageous. First, tule elk were once though extinct in CA because of agriculture. Point Reyes is one of the very few places in CA that has any tule elk at all, and only about 400 or so there. There is absolutely no reason why cattle, chickens etc cannot co-exist. Here in Wyoming, elk are all over private ranches, probably much more so than Pt. Reyes because they take refuge from hunters on private pastures. Elk, deer, antelope, all share pasture with cows. The excuse that cows are afraid of elk is totally absurd. Over 2000 elk winter in my valley and share pasture with 50 horses across the street from me. I've never seen a horse afraid of an elk, nor a cow neither.

The Park should consider a solution which would compensate ranchers for feed due to loss from elk. That has been successful in Wyoming. Fences should not be higher than 48", which helps prevent damage. But other animals also damage fences, and that is just part of being a rancher- -fixing fence.

Keep the elk. Let them roam. Wyoming, which is not exactly a liberal state, is making CA seem very backward on this issue.

#42

Name: Grubb, Michael

Correspondence: The National Park Service must remember its purpose when addressing the dairy farming-Tule Elk controversy in the Point Reyes National Seashore. The purpose is not to encourage the development of agriculture on national park land.

I support the do nothing alternative, plus removing the dairy farms from Pt. Reyes National Seashore when the current leases expire. There is no shortage of agricultural land in Marin County, nor is there a shortage of dairy products. There is a shortage of undeveloped land, and the Tule Elk exist in limited numbers. They are a natural part of California; dairy cattle are not. Their presence leads to much enjoyment of the Pt. Reyes National Seashore by the U.S. Taxpayers who paid to acquire and pay to operate it. The presence of dairy cows does not lead to any enjoyment, nor does it have a purpose.

Wild lands and native wildlife belong in Point Reyes National Seashore; dairy farms and cattle do not. It is that simple.

#43

Name: Sherwood, Michael

Correspondence: I hope the NPS chooses and implements what is currently designated Alternative F: Phasing out all ranching, and allowing the tule elk herd to expand naturally. In short, the park should be managed to allow it to return to as natural a condition as possible.

Thank you for considering my comment.

Michael Sherwood

#44

Name: James, Alison

Correspondence: Dear sirs/madam, Why are you 'managing elk'? Do you want to get rid of all the wildlife, so that domestic cattle and sheep proliferate? You do release your jobs will be next don't you? It just smacks of the Park Service pandering to ranchers. Dissapointed, Alison James

#45

Name: Adler, Carrie

Correspondence: Please save the Elk! I understand the desire to increase agricultural use in the area, but please, not at the expense of these rare and beautiful animals.

#46

Name: Fay, John

Correspondence: We have seen what happens to wildlife when ranchers are allowed to let cattle on the areas wildlife depends on. It ruins the landscape and the ranchers cause problems that hurt the wildlife. This state is already in bed with the ranchers. Just look at how they kill wolves that are natural but cattle are illegal imports to the national forests.

#47

Name: Good, Johanna

Correspondence: Please allow the ranching families of Pt. Reyes National Seashore to continue, and even expand, their agricultural practices by offering 20 year leases. Although 40 year leases would be better. Let us remember that they were there first, and likely there would be no National Seashore if it weren't for these families. Please manage the out of balance Tule elk population so that their existence may be compatible with the ranches. Thank you. Johanna Good

#48

Name: Betker, Deanna

Correspondence: These Elms are native animals that belong on the point. To kill them or remove them is wrong. The non native cows and other animals are the ones that need to go. This will allow all the native animals all the room they need. People go to point Reyes to see the natural beauty and not the bug stinky cattle ranches. The Elk are a highlight of many peoples day. If you must control the herd after you get rid of the cattle come up with a non surgical way to control them. In wild horses they use PZP which doesn't effect them having babies in the future. It keeps the herds size controlled and keeps them free and wild.

#49

Name: McBride, Sandra

Correspondence: pLEASE let the Tule Elk stay where they are. Installing fences to protect cattle is a viable alternative to killing them. It has taken so much effort to bring them back from extinction. Humans must steward the animals of the Earth for our future generations. I recently took a visitor from Virginia to see the elk herd. It was incredible. We both watched in awe for an hour. I would pay money to enter the reserve to view them if I knew it would help protect them. Farmers could be compensated for losses. Elk and cattle live together in Wyoming.

#50

Name: flewelling, robert

Correspondence: As a long-time and frequent visitor and recreational user of the natural resources of Point Reyes, I am opposed to the extension of agricultural leases and the expansion of uses within existing leases. Neither is required in order to manage the elk population. NPS should maintain its focus on the preservation and enhancement of recreational resources and wildlife habitat of the national seashore and do nothing more with respect to the grandfathered agricultural leases than may be strictly required by existing law.

Sincerely,

Robert Flewelling

#51

Name: N/A, N/A

Correspondence: As a visitor to Point Reyes for hiking and birding, I would like livestock and private businesses to be minimized. I understand this will have a negative effect on a few individuals, but I don't think that ranching can take place on the majority of this land without doing continued damage and limiting sustainable outdoors recreation opportunities. I am also very concerned that the elk herd should not be artificially limited in number for the benefit of non-native cattle.

I am an American citizen and not a troll or a bot.

Thank you for considering my comments.

#52

Name: Frost, Shelley

Correspondence: As an avid visitor to our national parks, I urge the National Park Service to prioritize the lives of the tule elk at the Point Reyes National Seashore over the livestock who are owned by private ranchers and farmers. As a US taxpayer, I strongly object to having our national lands be used by private business owners at the expense of wildlife. This is contrary to why our national parks were founded in 1872. In reaching your decision about whether or not to exterminate the tule elk, please follow the language in the act creating the National Park Service: "the Service thus established shall promote and regulate the use of the Federal areas known as national parks, monuments and reservations...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 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."

I look forward to future visits at the Point Reyes National Seashore where we will view the tule elk roaming in their natural environment, and we will take strong satisfaction that not a single cow besmirches the landscape.

Thank you for considering my views.

Warmly,

Shelley Frost

#53

Name: Wilson, Victoria

Correspondence: I am a consumer of organic and hormone-free dairy products like Clover, and support the efforts of sustainable ranchers and farmers to graze cattle in the Pt. Reyes area. The tule elk should be relocated. If this means killing some of them, this is part of best practices. I know on Grizzly Island there are no natural predators for the re-established elk population, and Fish and Game uses hunting to keep the population healthy and in control.

#54

Name: Shinski, Debbie

Correspondence: Remove all cattle and private property from the parks. Elk and Wildlife should be there first priority

#55

Name: Shinski, Debbie

Correspondence: Remove all cattle and private property from the parks. Elk and Wildlife should be there first priority

#56

Name: Spini, Chuck

Correspondence: Free range? a balance of nature ,remove all cities from here to the Sierras bring back the bears,allow hunting too stop over grazing.for some people it is meat on the table.not just to look at and die.You have very hard dilemma to deal with please make it fair one for the ranchers they are as if not more important.

Good Day, CJ Spini

#57

Name: N/A, N/A

Correspondence: My husband and I lived in the north bay for over 20 years and spent a great amount of time enjoying Point Reyes National Seashore, which truly is a national treasure and should be protected at all costs. The success of the reintroduction of elk is important for conservation of native species and restoring the ecosystem, and shouldn't be jeopardized for a few ranchers who were paid handsomely for their property and continue to receive below market grazing leases. The area within the park for free ranging elk should be expanded and protected for current and future generations to enjoy. Dairy ranches are important to Marin county and there are many outside the public parkland. The National Park Service is required to protect, restore and preserve the national resources at Point Reyes National Seashore, protect water quality, endangered species habitats and should not remove or displace native tule elk. It's important that the elk take precedence over livestock. Thus, we're in favor of the 'No Ranching and Limited Management of the Tule Elk alternative.

#58

Name: N/A, N/A

Correspondence: Farmers have hunted or poisoned all the predators - wolves, mountain lions, bobcats, grisly bears - and now Tule Elk are competing with their cattle. I think if the predators were left alone or re introduced, the issue would resolve itself. Both the cattle and the Elk would be thinned out in short order.

Farmers have created the problem and should be required to correct it.

I used to raise cattle in Northern California.

Until then,

Eugene F. Canales

#59

Name: Shen, Anne

Correspondence: No matter what you do, Do Not kill elks!!

#60

Name: Donaghy , Melanie

Correspondence: As someone who uses the Point Reyes National Seashore quite extensively I want to give my support to the Ranchers. While the Tule elk are of interest and I am not suggesting you eliminate them the ranches are just as important if not more so. You've already run the oysters out of town despite seeding San Pablo Bay with oysters at the same time. The ranchers are really good stewards of the land, far better than all these out-of-state, out of County environmentalist who do nothing to help with the upkeep of the land. It is this new breed of environmentalist that make me embarrassed to say I was once one. Take care of the ranchers.

#61

Name: Garcia, Jeremiah

Correspondence: It is important to preserve Point Reyes National Seashore. We want to keep the history of the state and the lands in proper shape. That legislation helps preserve the land of our beautiful state. It also is important in our agriculture, whether it is for growing crops or herds of cattle to supply our need for food. There are many amendments that they are trying to be [assed and I do agree with some in order to preserve our state's beaches, forests, and other national landmarks. I agree with the alternative proposition of No Dairy Ranching and Limited Management of the Drakes Beach Tule Elk Herd. I believe it is important that we start to sway away from dairy drinks like milk. Growing up, we were told that we needed milk for calcium and to get strong bones to be big

and strong. As I have gotten older and more educated, I know now that we do not need milk. In fact, it is unhealthy to rely on it as we get older. Our human bodies were not meant to have dairy for so long, especially dairy from other animals. Milk deteriorates our bodies the more we depend on it. There are plenty of healthier alternatives to calcium, including spinach, sardines, white beans, almonds, butternut squash, and other green vegetables. We can still have milk and dairy products though. I am not trying to ban it. I just want to limit it. I still want people to, of course, have the option. I just want them to know the truth.

#62

Name: Hoffman, Jeff

Correspondence: Your preferred alternative for Point Reyes National Seashore, to increase environmentally destructive ranching while killing and/or removing native elk, is totally wrong-headed and thoroughly disgusting. The purpose of our National Park system is, first and foremost, to protect, preserve, and restore native naturally-evolved plants and animals. Cattle are neither native nor naturally-evolved, and should be completely removed from the park, not increased in numbers. Elk, to the contrary, are native to northern California and there were a half million of them before overpopulated Europeans started killing them in great numbers. Elk were almost made extinct by these killings, but now small remnants, like those in Point Reyes, have been restored and are doing well.

If you work for the National Park Service in any capacity and want to remove or kill any native elk for any reason including ranching, you should resign immediately. In that case, you have no business working for this agency, because you do not support its main and most important purposes. You have no business working for the National Park Service if your main goal in your job is not to protect, preserve, and restore native animals like the elk in Point Reyes National Seashore.

#63

Name: Wuerthner, George

Correspondence: I would like the NPS to do a full analysis of the collateral damage done by domestic livestock. This includes the spread of weeds, the displacement of native wildlife like Tule elk, the pollution of streams, compaction of soils, loss of public access, and the domestication of the landscape.

Furthermore, I hope the NPS displays how much we taxpayers paid to ranchers originally for these lands.

In addition, the NPS should present the alternative to grazing on the National Seashore. I.e. is there any shortage of private grazing and even other public lands (BLM, FS) in CA.

There should also be an analysis of the on-going costs of managing private lands in terms of the lost opportunities for recovery of other species rare in CA like Tule elk. I.e. a comparison of lands available for elk recover vs lands available for domestic livestock.

The argument that PRNS is maintaining the "cultural landscape" should be put into context. As previously mentioned, there are many lands available outside of the national seashore where the cattle/dairy culture is maintained. It is by no means rare in CA or throughout the West.

What is rare, and therefore valuable, are lands that are managed primarily to preserve natural processes, evolutionary processes and ecological processes.

#64

Name: Aragon, Roberta

Correspondence: We have a responsibility to balance our environment. That includes keeping the ranch leases as long as they continue the good work to minimize negative impact to our environment. These ranches have been here for many years. And they have stepped up to the plate to become more diverse and environmentally sustainable.

For people who want to return places to what in their own vision is a better environment, I say where does that end? Who gets to say what that should look like? Do we all leave the area so it can become what it was centuries ago?

And if these same people want to eat sustainable food, where do they think it is coming from? Places far away that may not be using environmentally best practices and using huge trucks that pollute. And there is always that person who is vegetarian or vegan who believes everyone else should eat like them and want enforcement to make that happen.

As to the tule elk, I think the proposal to manage the herd to a certain number makes very good sense. The question I do not have a recommendation for is how to do that.

Please, please, use common sense in how you decide to balance this situation.

#65

Name: TORIUMI, PETRA

Correspondence: Tule Elk should be managed in a humane manner, allowing long term leases to dairy ranching, to continue on National park lands.

#66

Name: Toriumi, Gerald

Correspondence: Manage Tule Elks humanely, and restrict their grazing range to not encumber dairy ranching on National Park lands.

#67

Name: Wiley, Rob

Correspondence: I do not support moving, killing or doing anything with the beautiful Tule Elk that roam Point Reyes. I am astounded this is even a question. If the dairies don't like the elk, they can move, but leave the elk alone please.

#68

Name: Nichol, Sue

Correspondence: The ranchers should be charged more per acre to graze their cattle. No, elk should not be removed because of cows. If the park service needs more money to keep the park up then charge those that use it's resources the most. I don't mind my tax dollars going to the park but I do mind that these ranchers are not paying for the true cost of their cows grazing.

#69

Name: Matzinger, Richard

Correspondence: I strongly oppose plans to continue ranching in the Point Reyes National Seashore. I support ALTERNATIVE F: NO RANCHING AND EXPANSION OF TULE ELK IN THE PLANNING AREA

The deal all the land owners made when the PRNS was created in 1962 was that they were selling their land to the federal government and the farmers were given a significant but limited time to continue operations. That time has expired and it is time to restore Point Reyes to be natural habitat per the original goal.

The land owners were compensated for the land and that included acceptance of the plan that they would eventually cease operations. Now is the time to follow through with the plan.

#70

Name: Kestner, Shawn

Correspondence: Just as the cattle herd sizes are based off of sound science and available grazing the Elk herds should also. If the Elk herd has reached a level of over grazing it needs to be managed properly. Revenue is always an issue, hunters are a great source of revenue. Several hunts could be auctioned annually by Rocky Mountain Elk Foundation with the funds going directly back to the Point Reyes elk herd. Additional hunts should be placed into a raffle system for general, youth, women and disabled hunters. Simply culling any of the elk does not benefit the herd and that animal would go to waste and transplanting is very hazardous and costly to the elk and the transplant team.

#71

Name: Sciaroni, Charles

Correspondence: I am a great great grandson of John Oscar Eldridge, who was an owner of the San Rafael Gas Company and a hotel in San Rafael in the late 1880's. He constructed a dirt road, now named for him, to the top of Mt. Tamalpais.

I am in favor of Alternative B, to allow both continued ranching in the GGNRA property and management of the reintroduced tule elk herd to the number recommended by biological experts regarding this species. The manner of such regulation is not a significant part of the decision making process, in my opinion.

I would like continued coexistence of both the elk and ranching without the rancor that seems to be building about this.

#72

Name: Damazio, Cathy

Correspondence: Please do not exterminate the Tule Elk. Even some of the ranchers advocate sterilization over extermination. That is pretty shocking considering how ranchers tend to treat their animals. Not too many happy dogs riding around on the back of flatbed trucks out there. In the past you have made really bad decisions, having animals murdered under cover of darkness by out of state contractors. Don't do it again. I am sure it all comes down to money, it always does. One would think after letting whole herds of animals die of thirst out there a few years ago you would try to make up for that by doing the right thing. Killing everything isn't the right thing. Cathy Damazio

#73

Name: Kirson, Phyllis

Correspondence: I am very disturbed at the thought that killing off some of the much revered Tule Elk is being considered as a possibility for the Pt. Reyes Nat'l Seashore, especially in light of the toll raising meat cattle takes on the environment which has been researched and confirmed. Please don't do this! Thank you, Phyllis Kirson, a long time Marin resident.

#74

Name: Brann, Josh

Correspondence: I would like to see alternative F, "No ranching, and expansion of tule elk in study area", implemented in Point Reyes National Seashore, and strongly encourage the National Park Service to adopt this approach.

Point Reyes National Seashore is a public resource made up of public land, and it is very unclear why private commercial interests should have priority over public interests in this area. It is fine to recognize the history of ranching in that region, and to provide information and displays about this history - no one should be asking that this history be erased. However, in its current existence as a public resource, Point Reyes National Seashore should be managed in a way that is consistent with public interests. This means providing for public access to all of the public land (within reason - excepting especially sensitive ecological areas, etc.), and allowing the ecosystem to exist and function in its natural state, to the extent possible.

When I, as an American and Californian, go to visit Point Reyes National Seashore, and other public lands, I don't want to see cows and fences; I don't want to see streams trampled by cows into a muddy pulp, and think how those streams cannot serve their ecosystem function as repositories for amphibians, birds, and small fish. There are plenty of places in California where I can go to see fences and cows; there are extremely few places I can go to see tule elk and wild coastal landscapes in their natural state. I don't want to encounter a fence, and be told I can't walk through my own national public land. Every time I visit Point Reyes National Seashore I don't think "how wonderful it is with the cows, they must be really improving the natural ecosystem", I think "why is it that some people have gotten the right to make money from my public land?" and "I wonder what this landscape must have looked like in its natural state, before it was covered with cows and fences?"

Please take this opportunity to put public interests over private, ecosystems above economics, and allow ALL of Point Reyes National Seashore to be a resource for ALL Americans, not just a select few. Please phase out ranching of all kinds in Point Reyes National Seashore, and allow the ecosystem to exist in its natural state as much as possible.

Thank you,

Josh Brann

#75

Name: Burton, Ken

Correspondence: Regarding elk management:

Ecosystem restoration must be the highest priority. Elk should be maintained at a level reflecting the land's carrying capacity. Whether that land includes private ranch leases or not is a separate discussion.

I do not necessarily advocate culling as a management tool, but it is certainly more humane than the results of overcrowding and arguably more humane than relocation, which can be extremely traumatic. Do not let your decision in this matter be swayed by animal-rights folks who believe that keeping an animal (or human) alive is ALWAYS the more humane option. It isn't.

#76

Name: Emmerich, Kevin

Correspondence: So number 1, you can not email comments or attachments. This is a streamlining trick to get as few comments as possible. You are well aware that the Interior Department takes emails all the time. You know better.

Number 2. You have to send it snail mail which eliminates much of the 30 day comment window.

Number 3. You only provide 30 days for scoping comments for a General Management Plan. YOU MUST EXTEND THAT COMMENT PERIOD!!!!!!

Number 4. Bulk comments will not be accepted? Why?? This is how many Americans who are very busy and don't have time to read these documents get heard. This is very sleazy and eliminates public opinion.

Number 5. The dairy farmers are SQUATTERS! Their lease has expired and they need to LEAVE.

Number 6. I used to work for the National Park Service and we never treated the conservation interested public so poorly. You are pandering to industry at the expense of the public interest. This is political sleaze 101 and it needs to stop. Quit acting like President Trump.

Number 7. Why I have to tell you not to kmill native elk for cows? You are the National Park Service! What is your problem?

#77

Name: YOUNG, Meredith

Correspondence: As a taxpaying Californian, why is my National Park utilized by FOR-PROFIT dairy and cattle interests for a yearly pittance ? These big ranches literally destroy the land and pollute the water . Also, I would like to know how this taxpayer purchased parkland got converted to private moneymaking interests vs open access, wildlife friendly parks that , as I understand, the US & California taxpayers purchased many years ago..... Clearly the taxpayer and the Tulle elk got short shrift in this deal...Who got paid off ? Lets' return the National Seashore to all the US taxpayers and the wildlife we all treasure.

#78

Name: Denicke, Martin

Correspondence: These comments refer to the proposed tule elk management plan under review.

In order to control the elk herd, which has been generally increasing over the past several decades, culling may be necessary. I am in favor of culling the herd as necessary. It is my impression that deer herds when not controlled either by predation or hunting, can greatly expand. What results is overgrazing followed by starvation of some portion of the herd. I believe this was the conclusion of a study conducted at the Kaibab plateau in northern Arizona many years ago. I am presuming that elk herds would respond to the same results if their population is not somehow controlled.

Is a quick death to an elk from a properly placed bullet less cruel than a slow death due to starvation? I believe the answer is affirmative.

Relocation of excessive elk I believe would be very expensive and fraught with problems (disease transmission, where to transport the elk, etc.) thus is highly impractical.

In conclusion, I realize there tends to be a very emotional negative response to culling but it is a necessary management tool.

#79

Name: Weingarten, Toni

Correspondence: With so much of our wilderness vanishing and the environment and climate in danger... I do not understand why you would think of relocating the elk from Point Reyes so that more cows can graze, create more methane gas and further hurt the environment! We should preserve all the national treasures that we have... And get people to eat less beef ...we want our children to be able to inherit a place with wild creatures!

#80

Name: Harris, Elizabeth

Correspondence: NO LETHAL REMOVAL OF TULE ELK!! Why don't you just come out and say "killing?" The park was successful in reintroducing this endangered native species, and now the park is considering killing some of them? Awful. Relocation, if necessary, is far more acceptable and humane.

#81

Name: Savage, Charles

Correspondence: The National Park Service should pursue Alternative F, No Ranching and no barriers to the expansion of Tule Elk in the Planning Area. All ranching operations should be phased out over a 5 year period and all grazing should be eliminated in 1 year. No agricultural activities should be permitted thereafter.

Beef ranching and dairy operations effectively block the tax paying public with barbed wire fencing and locked gates from access to 28,000 acres of National Park Service lands within the Point Reyes National Seashore and the Golden Gate National Recreation Area. Existing Tule Elk herds are also blocked by barbed wire fencing from access to grazing and water that is vital for them to exist and expand in their natural habit.

Continued beef and dairy operations are contrary to the provisions of the Golden Gate NRA legislation "to preserve for public use and enjoyment .." and 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 USC 460bb.

The tax paying public who funded the purchase of these lands should not be deprived of access and enjoyment to areas of exceptional scenic beauty by commercial ranching operations.

#82

Name: Traylor, Monica

Correspondence: I read the article in the Nov 6 issue of the IJ and decided to put in my 2 cents. My husband and I are regular visitors to Point Reyes National Seashore. We have hiked many of the trails, and the one by the shore where you can see the tule elk is one of our favorites. However, I see little benefit to allowing overpopulation of the elk. They are enormous animals that need a lot of space and consume a lot of food. Ideally the park service would be able to sterilize several of the females so that the herds would stop growing, but if that is not possible, then culling the herds would be better than letting them ravage the ranches or allowing them to become sick and starve due to lack of enough pasturage and water. So if culling is used as a last resort, I'm for it. I support the rights of the ranches that lease land at the National Seashore in accordance with the agreements between the park service and the ranches at the time that the the Seashore became a national park. The ranchers have a right to use their land and not face incursions from the elk.

I know this is not part of the plan, but I wish someone would consider culling the deer that run wild in Novato. There are more every year, and they eat homeowner's plants and don't know to get off the streets when cars are coming.

Monica Traylor

#83

Name: VanVelkenburg, Michael

Correspondence: For the betterment of the park, I would recommend the option of E or F. It is best to bring the park back to its natural state. If you want grazing, then I would recommend Buffalo.

#84

Name: Smith, thomas

Correspondence: The National park Service mission is to manage the parks in such manner as to leave them unimpaired for the enjoyment of future generations.

#85

Name: Thomas, Craig

Correspondence: I do not believe Ranchers and Dairies should be allowed on National Park Land at all. The amount of water required for cattle and cows is enormous and places a burden on our environment. As noted in the Documentary "COWSPIRACY" meat and dairy cattle are destroying our planet. To allow these practices to continue on public/National Park Land should not be allowed to protect our environment. And then, to add insult to injury, moving and/or destroying the native Tule Elk is criminal and all for the profit of the Ranchers and contributing to further environmental damage.

#86

Name: storlie, erik

Correspondence: Please protect Point Reyes from livestock. Ranchers have already been bought out in many cases and should not be allowed to return to business as usual. This beautiful area belongs to every citizen of the USA - - and has value far beyond the meat that can be taken off the land.

#87

Name: Gregg, K.

Correspondence: I absolutely oppose the National Park Service's proposal to rework its management plan for Point Reyes National Seashore in favor of private/corporate livestock. Private ranches were bought out more than four decades ago, at fair market value and enormous taxpayer expense, to create the National Seashore. In 1978, Congress passed a law that livestock leases on these Park Service lands could be extended "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 his or her spouse." Beyond that point, Congress allowed, but did not require, the Park Service to issue ranch leases if ranching does not impair the natural resources and wildlife at the Seashore. Heavy grazing by beef and dairy cattle is destroying the native coastal prairie, replacing native grasses with noxious weeds. Livestock contaminate streams and rivers with manure, resulting in some of the worst Clean Water Act violations in California for fecal bacteria, in streams that empty out onto popular public beaches. Tule elk are rare and imperiled, and the "elk preserve population is fenced into a narrow peninsula that lacks adequate water during drought, confinement that killed hundreds of elk between 2012 and 2014. The fence must come down, and elk, not livestock, should be allowed to thrive throughout Point Reyes National Seashore. Cultivation of "silage crops" on Point Reyes to feed cattle in Concentrated Animal Feeding Operations (CAFOs) destroys native habitats, and when silage is mown in Spring, kills ground-nesting birds and native rodents. This subsidizes unnaturally large raven populations, which

in turn prey on the nests of the endangered snowy plover in their beachside nesting habitats. Dairy and beef cattle are infected with Johne's disease, a chronic wasting intestinal disease, which spreads to native elk and may be a public health and safety hazard as well. Cattle cause increased erosion and siltation in local trout and salmon spawning streams, threatening the survival of imperiled runs of coho salmon and steelhead. The high density of livestock, barbed-wire fences, and malodorous manure-spreading on the hilltops at Point Reyes is incompatible with the National Seashores legal charge to provide "public benefit, recreation and inspiration." The interests of 335 million Americans, and 7 million Bay Area residents, should take precedence over the interests of 13 ranching families who have overstayed their lease terms. The new plans will update management guidance for more than 28,000 acres of park land, including key habitats for the rare tule elk. I oppose the Park Service's proposal to remove native elk from livestock areas. Native tule elk would be "hazed" out of or "lethal methods" could be used, and the proposed plan would renew ranch leases for 20 years. The Park Service might also allow expanded for-profit activities on National Park Service lands, like growing farm crops and increased poultry farming.

I absolutely oppose the National Park Service's proposal to rework its management plan for Point Reyes National Seashore in favor of private/corporate livestock.

#88

Name: Carothers-Liske, Andrew

Correspondence: It's high time to end the era of running cattle rough-shod over the Point Reyes ecosystem- time to let the elk have the entire peninsula back. Point Reyes National Park and Seashore attracts millions of visitors a year, and they are not coming to see cows. We need to end the legacy of prioritizing rancher's access to our Crown Jewels in an era when public lands are being understood as a critical component to assuring the survival of keystone species that trigger ecosystem resilience through the trophic cascade effects that their presence assures. Point Reyes will serve the public interests much more fully once the ranching leases are terminated and the ranching phased out. There's nothing historical about a 160 year abuse of a pristine wilderness landscape that needs to be restored to its full natural splendor. The original leases were never intended to be permanent, and as we move into a future where wild lands and wild creatures that depend upon them for their sustenance and survival are ever more imperiled it becomes clear that a management plan for the next quarter century at Point Reyes should not expand, but instead further reduce and ultimately eliminate all ranching activities on the peninsula. This issue is much bigger than the purported legacy of a few families who've been operating on the Point Reyes peninsula since the mass arrival of those of European ancestry. Time to enforce the buyout that has already been made to the family operators. Let's do the right thing and get rid of the COWS.

Andrew Carothers-Liske

#89

Name: Brach, David

Correspondence: Please remove all livestock from Point Reyes National Seashore. This is a place for wildlife and human visitors, not cows.

#90

Name: Gaede, Marnie

Correspondence: Tule elk are rare and imperiled, and the "elk preserve population is fenced into a narrow peninsula that lacks adequate water during drought, confinement that killed hundreds of elk between 2012 and 2014. The fence must come down, and elk, not livestock, should be allowed to thrive throughout Point Reyes National Seashore. Cultivation of "silage crops" on Point Reyes to feed cattle in Concentrated Animal Feeding Operations (CAFOs) destroys native habitats, and when silage is mown in Spring, kills ground-nesting birds and native rodents. This subsidizes unnaturally large raven populations, which in turn prey on the nests of the endangered snowy plover in their beachside nesting habitats. Dairy and beef cattle are infected with Johne's

disease, a chronic wasting intestinal disease, which spreads to native elk and may be a public health and safety hazard as well.

This is a totally misguided plan. Point Reyes should be protected for generations, not used as a cattle ranch. Choices made today can either enhance or denigrate the future. Do the right thing.

#91

Name: Quigley, Mike

Correspondence: Prioritize wildlife, not livestock grazing. Remove livestock fencing.

#92

Name: Kenney, Jack

Correspondence: The Tule Elk are a rare species of Elk that need to be protected. The cattle farmers are impairing that from happening. There could be a much more sustainable number of Elk if the cattle were removed. Since the 25 year agreement is long over and it is clear that they impair the recovery of the Tule elk, The Private ranches should be removed.

#93

Name: Tuescher, Ted

Correspondence: As a frequent visitor to Pt. Reyes National Seashore and Marin resident for several decades, please accept my comments on the Environmental Impact Statement (EIS) for the General Management Plan Amendment (GMP Amendment) for Point Reyes National Seashore and the north district of Golden Gate National Recreation Area.

These lands are places of unusual beauty and respite from the crowded SF Bay Area. We should maintain and improve these natural features as they are of increasing value due to the pressure on other surrounding natural lands, flora and fauna.

I urge you to support these important values:

1. Support and enable the Tule Elk population at sustainable levels. These native species should continue to be present on the lands and be allowed to expand, expanding lands as needed.
2. Support water quality for the natural marine life and oyster farming such as it remains. This may require some limitation of ranching activity or at least limitations on expansion of this activity.
3. Support federally listed species and other wildlife, allocating adequate habitat to support the fauna already under so much pressure in the surrounding region before opening any additional land for ranching activity.

I appreciate this process involves balancing many complex factors. I support low levels of commercial activity for its contribution to the local economy and welfare. But for these lands, prefer that we defend and maintain the natural features over any significant expansion of ranching activity due it's risk to further soil erosion, impact on water quality recreational enjoyment.

While support of the local ranching economy benefits the local inhabitants and community on some level, I ask that the plan not go so far as to negatively impact the existing natural values and also support the long-standing community of artists and environmentalists when the ranching interests are considered.

Thank you for your consideration.

#94

Name: KROGER, RICHARD

Correspondence: Dear Sir/Madam:

I just want to express my views that all livestock grazing on Point Reyes and other of my associated National Service lands should be immediately eliminated. Livestock grazing has no place for fitting into the mission of the National Park Service.

Public Land grazing has done more historical ecological damage to our Western Public Lands than all other uses by man, combined. We do not want similar damages occurring to our Western National Parks Public Lands.

Sincerely,

Richard Kroger

#95

Name: Leckie, Leo

Correspondence: NATIVE WILDLIFE SHOULD TAKE PRECEDENCE

I have come to Point Reyes National Seashore as part of my university's (of Utah) alternative spring break program to remove invasive, non-native vegetation from the area, and policies that ensure native inhabitation are thus very important to me at this place that I treasure.

Private ranches were bought out more than four decades ago, at fair market value and enormous taxpayer expense, to create the National Seashore. In 1978, Congress passed a law that livestock leases on these Park Service lands could be extended "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 his or her spouse." Beyond that point, Congress allowed, but did not require, the Park Service to issue ranch leases if ranching does not impair the natural resources and wildlife at the Seashore.

Heavy grazing by beef and dairy cattle is destroying the native coastal prairie, replacing native grasses with noxious weeds.

Livestock contaminate streams and rivers with manure, resulting in some of the worst Clean Water Act violations in California for fecal bacteria, in streams that empty out onto popular public beaches.

Tule elk are rare and imperiled, and the "elk preserve population is fenced into a narrow peninsula that lacks adequate water during drought, confinement that killed hundreds of elk between 2012 and 2014. The fence must come down, and elk, not livestock, should be allowed to thrive throughout Point Reyes National Seashore. Cultivation of "silage crops" on Point Reyes to feed cattle in Concentrated Animal Feeding Operations (CAFOs) destroys native habitats, and when silage is mown in Spring, kills ground-nesting birds and native rodents. This subsidizes unnaturally large raven populations, which in turn prey on the nests of the endangered snowy plover in their beachside nesting habitats.

Dairy and beef cattle are infected with Johnes disease, a chronic wasting intestinal disease, which spreads to native elk and may be a public health and safety hazard as well.

Cattle cause increased erosion and siltation in local trout and salmon spawning streams, threatening the survival of imperiled runs of coho salmon and steelhead. The high density of livestock, barbed-wire fences, and malodorous manure-spreading on the hilltops at Point Reyes is incompatible with the National Seashores legal charge to provide "public benefit, recreation and inspiration." The interests of 335 million Americans, and 7

million Bay Area residents, should take precedence over the interests of 13 ranching families who have overstayed their lease terms.

Please value the NATIVE treasures of this National Monument, and don't allow invasive, non-native rehabilitation of Point Reyes.

Thank you,

Leo Leckie Alternative Spring Break Participant University of Utah

Resident Gardiner, Montana

#96

Name: nilson, Tracy

Correspondence: Do not prioritize livestock over our wilderness lands and our wildlife. Wildlife come before any livestock in their own habitats. FACT livestock destroy streams and rivers and vegetation other little animals need to survive, the manure from livestock is killing the species in the waters, the Elk fence needs to come down and only the Elk not the livestock be allowed to thrive throughout the Point Reyes National seashore!!

#97

Name: Dollard, Nancy

Correspondence: Please put WILDLIFE FIRST over ranchers and their wandering cattle. Private ranches were bought out more than four decades ago, at fair market value and enormous taxpayer expense, to create the National Seashore. In 1978, Congress passed a law that livestock leases on these Park Service lands could be extended "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 his or her spouse." Beyond that point, Congress allowed, but did not require, the Park Service to issue ranch leases if ranching does not impair the natural resources and wildlife at the Seashore. Heavy grazing by beef and dairy cattle is destroying the native coastal prairie, replacing native grasses with noxious weeds. Livestock contaminate streams and rivers with manure, resulting in some of the worst Clean Water Act violations in California for fecal bacteria, in streams that empty out onto popular public beaches. Tule elk are rare and imperiled, and the "elk preserve population is fenced into a narrow peninsula that lacks adequate water during drought, confinement that killed hundreds of elk between 2012 and 2014. The fence must come down, and elk, not livestock, should be allowed to thrive throughout Point Reyes National Seashore. Cultivation of "silage crops" on Point Reyes to feed cattle in Concentrated Animal Feeding Operations (CAFOs) destroys native habitats, and when silage is mown in Spring, kills ground-nesting birds and native rodents. This subsidizes unnaturally large raven populations, which in turn prey on the nests of the endangered snowy plover in their beachside nesting habitats. Dairy and beef cattle are infected with John's disease, a chronic wasting intestinal disease, which spreads to native elk and may be a public health and safety hazard as well. Cattle cause increased erosion and siltation in local trout and salmon spawning streams, threatening the survival of imperiled runs of coho salmon and steelhead. The high density of livestock, barbed-wire fences, and malodorous manure-spreading on the hilltops at Point Reyes is incompatible with the National Seashores legal charge to provide "public benefit, recreation and inspiration." The interests of 335 million Americans, and 7 million Bay Area residents, should take precedence over the interests of 13 ranching families who have overstayed their lease terms. Considering ALL of these factors, it is much BETTER to SUPPORT Wildlife and not let dairy & beef cattle INFECT wildlife OR have OUT OF CONTROL ranchers graze on PUBLIC lands or ILLEGALLY "hunt" wildlife on PUBLIC lands.

#98

Name: Simpson, Edward & Beatrice

Correspondence: We now know the results of heavy grazing! Throughout this country, the native grasses are

gone. As elsewhere, cattle and sheep destroy water sources. Stop the insanity! Native wildlife is also impacted by the hooved locusts. Often they are forever gone.

Our taxes bought out these ranchers! Get them off our lands now! The sweetheart deal is over. Americans are awake and we want our lands back where nature intended. Thirteen families? On MY land? Get them off now. Forever, completely, every last one of them.

#99

Name: Tidwell, Stephanie

Correspondence: Pt. Reyes National Seashore should be managed for wildlife and recreation - not destructive livestock grazing. The private ranches were bought out more than four decades ago, at fair market value and enormous taxpayer expense, to create the National Seashore. In 1978, Congress passed a law that livestock leases on these Park Service lands could be extended "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 his or her spouse." Beyond that point, Congress allowed, but did not require, the Park Service to issue ranch leases if ranching does not impair the natural resources and wildlife at the Seashore.

Heavy grazing by beef and dairy cattle is destroying the native coastal prairie, replacing native grasses with noxious weeds. Livestock contaminate streams and rivers with manure, resulting in some of the worst Clean Water Act violations in California for fecal bacteria, in streams that empty out onto popular public beaches.

Tule elk are the victims - not the cause - of continuing habitat degradation. Tule elk are rare and imperiled, and the "elk preserve population is fenced into a narrow peninsula that lacks adequate water during drought, confinement that killed hundreds of elk between 2012 and 2014. The fence must come down, and elk, not livestock, should be allowed to thrive throughout Point Reyes National Seashore.

Cultivation of "silage crops" on Point Reyes to feed cattle in Concentrated Animal Feeding Operations (CAFOs) destroys native habitats, and when silage is mown in Spring, kills ground-nesting birds and native rodents. This subsidizes unnaturally large raven populations, which in turn prey on the nests of the endangered snowy plover in their beachside nesting habitats.

Dairy and beef cattle are infected with John's disease, a chronic wasting intestinal disease, which spreads to native elk and may be a public health and safety hazard as well.

Cattle cause increased erosion and siltation in local trout and salmon spawning streams, threatening the survival of imperiled runs of coho salmon and steelhead.

The high density of livestock, barbed-wire fences, and malodorous manure-spreading on the hilltops at Point Reyes is incompatible with the National Seashores legal charge to provide "public benefit, recreation and inspiration." The interests of 335 million Americans, and 7 million Bay Area residents, should take precedence over the interests of 13 ranching families who have overstayed their lease terms.

Do the right thing. Rein in livestock grazing. Protect wildlife and public trust values.

#100

Name: N/A, N/A

Correspondence: Pt. Reyes National Seashore should be managed for wildlife and recreation - not destructive livestock grazing.

The private ranches were bought out more than four decades ago, at fair market value and enormous taxpayer expense, to create the National Seashore. In 1978, Congress passed a law that livestock leases on these Park

Service lands could be extended "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 his or her spouse." Beyond that point, Congress allowed, but did not require, the Park Service to issue ranch leases if ranching does not impair the natural resources and wildlife at the Seashore.

Heavy grazing by beef and dairy cattle is destroying the native coastal prairie, replacing native grasses with noxious weeds. Livestock contaminate streams and rivers with manure, resulting in some of the worst Clean Water Act violations in California for fecal bacteria, in streams that empty out onto popular public beaches.

Tule elk are the victims - not the cause - of continuing habitat degradation. Tule elk are rare and imperiled, and the "elk preserve population is fenced into a narrow peninsula that lacks adequate water during drought, confinement that killed hundreds of elk between 2012 and 2014. The fence must come down, and elk, not livestock, should be allowed to thrive throughout Point Reyes National Seashore.

Cultivation of "silage crops" on Point Reyes to feed cattle in Concentrated Animal Feeding Operations (CAFOs) destroys native habitats, and when silage is mown in Spring, kills ground-nesting birds and native rodents. This subsidizes unnaturally large raven populations, which in turn prey on the nests of the endangered snowy plover in their beachside nesting habitats.

Dairy and beef cattle are infected with Johne's disease, a chronic wasting intestinal disease, which spreads to native elk and may be a public health and safety hazard as well.

Cattle cause increased erosion and siltation in local trout and salmon spawning streams, threatening the survival of imperiled runs of coho salmon and steelhead.

The high density of livestock, barbed-wire fences, and malodorous manure-spreading on the hilltops at Point Reyes is incompatible with the National Seashores legal charge to provide "public benefit, recreation and inspiration." The interests of 335 million Americans, and 7 million Bay Area residents, should take precedence over the interests of 13 ranching families who have overstayed their lease terms.

Do the right thing. Rein in livestock grazing. Protect wildlife and public trust values.

#101

Name: Kelly, N. Jo

Correspondence: I wish to submit the following comment on your comprehensive environmental review of the Point Reyes National Seashore:

When the Park Service bought out the private ranches to create this park (at considerable taxpayer expenditure), livestock grazing was supposed to end within 25 years. It has now been three decades, and you have failed to curtail grazing. Your wanton disregard for the terms of the ranch purchases is unacceptable to those of us who advocated for establishing the Point Reyes National Seashore.

Furthermore, the heavy cattle grazing that you continue to allow is destroying the native coastal prairie and streambeds. Noxious weeds are rampant, and the streams and rivers are heavily contaminated with deadly bacteria from cow manure. I am deeply disappointed in the Park Service's lack of stewardship of our public lands, and especially with the preservation of Point Reyes National Seashore.

In addition to allowing destructive grazing, you are allowing silage crop cultivation and feed lots which have further destroyed the native seashore habitat. The preventable consequences to your allowing the removal of native vegetation have been massive losses of native birds when the silage crops are mown and the subsequent raven infestation.

I am dismayed at the Park Service's lack of stewardship of our public lands, and especially with the preservation of Point Reyes National Seashore.

It is critically important for the Park Service to cease allowing grazing, feed lots and silage crop production in the Point Reyes National Seashore.

Respectfully submitted, Jo Kelly

#102

Name: Merrick, Judy

Correspondence: Private ranches were bought out more than four decades ago, at fair market value and enormous taxpayer expense, to create the National Seashore. In 1978, Congress passed a law that livestock leases on these Park Service lands could be extended "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 his or her spouse." Beyond that point, Congress allowed, but did not require, the Park Service to issue ranch leases if ranching does not impair the natural resources and wildlife at the Seashore.

Dairy and beef cattle are infected with Johne's disease, a chronic wasting intestinal disease, which spreads to native elk and may be a public health and safety hazard as well.

Cattle cause increased erosion and siltation in local trout and salmon spawning streams, threatening the survival of imperiled runs of coho salmon and steelhead.

#103

Name: N/A, N/A

Correspondence: I am a native of the San Francisco Bay Area and am very familiar with Point Reyes. In addition to being beautiful, it is biologically unique in many ways and every effort should be made to preserve native plants and wild animals that live there. I therefore want to see livestock grazing cease on Seashore lands. These lands were bought out with taxpayer dollars decades ago from private ranches. I have read that currently 13 families graze their livestock on these public lands. Why should these 13 families benefit to the detriment of millions of Bay Area residents and other Americans who visit the Seashore? Public lands are just that: public. The public should be given precedence over 13 families.

#104

Name: Lonn, Jeff

Correspondence: I have not ever visited Pt Reyes National Seashore, but when I do so, I do not want to see cattle ranches and the overgrazed landscape that comes with them. I want to see Tule Elk in their native habitat, clean air, clean water, and native vegetation.

The high density of livestock, barbed-wire fences, and malodorous manure-spreading on the hilltops at Point Reyes is incompatible with the National Seashores legal charge to provide "public benefit, recreation and inspiration." These lands belong to all Americans, not to the 13 ranching families who have overstayed their welcome (and lease terms). This is an extreme example of welfare ranching and needs to stop.

Please remove the cattle and ranches as you were required to do many years ago, and return this preserve to nature and the American people.

#105

Name: Zager, Bill

Correspondence: Good morning.

In 1978 Congress passed a law limiting livestock leases on Point Reyes park service lands, allowing no more than a single 25-year extension. Congress also allowed additional leasing if it did not impair the natural resources and native wildlife present.

However, livestock does most certainly "impair" the natural environment in numerous ways incompatible with public enjoyment and clearly contrary to with the National Seashores legal responsibility to provide "public benefit, recreation and inspiration." The interests of millions of Americans, and millions of Bay Area residents, should take precedence over the interests of 13 ranching families whose leases have expired.

Domestic livestock should be removed forthwith and these public lands managed for the benefit of the Tule elk, the public at large and wildlife in general.

Thank you for considering this.

#106

Name: Hicks, Sandra

Correspondence: Livestock grazing Point Reyes area is a very bad idea. Livestock contaminate the water with fecal bacteria detrimental to the Natural ecosystem and eventually reaching public water sources and beaches. Livestock grazing destroys native grasses and habit for the Natural wildlife. Cows, destroying natural grasses allow invasive and noxious weeds to take over. Furthermore, addressing the issue with Tule Elk. The fence must come down! The sad case for a preserve has clearly shown to be inadequate and inhumane with hundreds killed from lack of water during drought times. And we all know that drought is a current and future threat to us all. Point Reyes is no place for livestock. Any human with eyes to see could tell you this! And no removing of Tule Elk for cows!

Preserve and protect! Remember, Preserve and Protect, that is and was the honorable ideals and responsibilities of the founding of the National Park Service. Now is a crucial time. A time to step up and be more. To reach deep inside to find new ways to do it differently now. To be accountable for how we decide to protect our human and natural habitats. This is the only place we have to live. Thank you.

#107

Name: Glaccum, Ellen

Correspondence: Point Reyes, like all national seashores, is legally charged with maintaining "public benefit, recreation, & inspiration." Livestock operations are not compatible with that charge. Seashores should be managed for NATIVE flora and fauna, not domestic cattle. NPS needs to work for ALL Americans, not 13 selfish ranchers who were bought out in 1978 and are now disregarding the terms of their leases. The time is long overdue to restore Point Reyes to its natural state and eliminate all livestock operations.

#108

Name: Turner, Steven

Correspondence: The ranches in Point Reyes need to go. I understand they are "historic" but that doesn't mean they need to be operated anymore. They could be abandoned and preserved like the Pierce Point Ranch. What public good or interest does it serve to have cows milling around on Government property, especially when they're competing with and spreading diseases to the Tule Elk. If you asked just about anyone if they'd rather see elk or cows roaming a national park most would say elk. Elk also do a better job of preserving the land as a grass

land. Finally why should the interests of a few ranchers take precedent over the public interest in seeing wild animals roaming the landscape in one of the few pristine coastal environments.

#109

Name: PATLA, DEBRA

Correspondence: As an American who treasures our national parks, I am horrified by the cattle grazing and related activities at Point Reyes National Seashore. You are failing in your mission to protect and preserve these lands. Fencing out and removing native wildlife such as tule elk, and allowing for the degradation of waterways is a betrayal of your agency mission. The stench of manure and the sight of 'hammered' landscapes has no place in protected and beloved places under your management. If your actual goal is to reduce human visitation to Point Reyes, this is a horrific way to do it. Please stop coddling a small number of ranchers; defend our beautiful country! End the cattle grazing at the National Seashore, and put your efforts into restoration of the native prairie and aquatic zones.

#110

Name: Johnston, Bob

Correspondence: Comments on the PRNS GMP Amendment NOI and Scoping Document to Update Guidance on Ranching Lands, Including the N. District of the GGNRA

Bob Johnston, 11/11/18

Background: The NPS published the NOI for an EIS for this GMP Amendment on 10/31/2018, starting the 30-day Scoping review period. In this notice and in the accompanying PRNS web pages scoping the DEIS, the statements of Purpose and Need are given, Impact topics are outlined, and Background is related on the lawsuit settlements requirements for specific alternatives that must be evaluated.

My Qualifications: Under case law, NEPA comments from experts should be given more weight, so I will give a short statement on my experience. I have an MS degree in Renewable Natural Resources, a field that includes grazing management. I was a professor of environmental planning at UC Davis, 1971-2005, and taught a course on environmental impact assessment to students for 33 years and also gave several extension classes to mid-career professionals on NEPA law and practice. These classes included USFS, NPS, BLM and other Federal land management agency staff people as students. I published several articles and book chapters on impact assessment methods and was on State advisory committees re. CEQA practice in the 1970s. I have been an expert in NEPA cases for over 40 years.

I read the meeting materials (handouts and easels) for conceptual alternatives a year ago and all the materials currently on the PRNS web site Scoping page. I have read related information on that web site, including the Bartolome report on residual dry matter on the ranches, the report on the effects of mowing silage on birds, the FAQs page, the summary of comments from the 2015 workshops, and the first few pages of the legal settlement.

Comments on the Scoping Study:

1. The motivation for the GMP amendments First, any GMP amendment process should tell the reader what laws command the NPS or guide it, in general, and in ranch management specifically. This information is absent here. 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) Also, in the founding statute, we find: "...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... These provisions make it clear that all activities in parks must not impair natural resources.

The NPS Management Policies (2006) (180 pages) summarizes the Underlying Principles as including: 1. Prevent impairment of park resources and values; and 2. 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. (p. 2) This document is the highest-level policy statement in the NPS. The mandate to restrict recreation and other human uses so as to not impair natural resource values was restated in the "Redwood amendment" to the Organic Act in 1978. It actually requires that resources be improved. The act establishing the Seashore (PL 87-657) restates this policy in Sec. 459(c)(6): " &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..." So, the NPS must not only protect its lands, but must restore them to an improved state.

The Management Policies book says, in discussing various uses allowed in parks in Sec. 8.6.7, that "In general, agricultural activities should be conducted in accordance with accepted best management practices." Sec. 8.6.8 says that "Agricultural livestock grazing will use best management practices to protect park resources, with particular attention being given to protecting wetland and riparian areas, sensitive species and their habitats, water quality, and cultural resources. Managers must regulate livestock so that ... ecosystem dynamics and the composition, condition, and distribution of native plants and animal communities are not significantly altered or otherwise threatened..." Note the mandatory verbs which require these actions.

Please describe these statutory and administrative mandates in the DEIS as they motivate the GMP amendments and define the standards that apply to ranch management. BMPs are often described as advisory by agricultural organizations, but in the NPS case must be interpreted as mandatory, because of the policies described above. Range conditions must be improved, in each lease.

2. The affected environment In order for a commenter to understand the intent of the GMP amendments, they must be informed about the history of grazing in the PRNS and all problems that have occurred, regarding water quality, wetland and riparian areas, sensitive species and their habitats, and all other environmental issues. This information was completely lacking in the Conceptual Alternatives documents a year ago and are absent in the present NOI. Fortunately, as noted above, reports on residual dry matter (range condition) and mowing impacts on nesting birds are on the NPS web site. No data on water quality, wetland conditions, riparian conditions, and other issues were made available. These long-term trend data are essential in a DEIS as part of the affected environment discussion as a baseline against which to measure changes (impacts), are necessary to identify (scope out) 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. Indeed, this is the basic rationale and structure of an EIS and one cannot discuss any part in isolation. This NOI and Scoping document should include enough description of the Affected Environment so that the reader can decide what the Impacts may be and so what Alternatives should be considered. I will outline some issues re. the affected environment that readers should be aware of.

It is clear from reading the Bartolome report that many ranches regularly violate the Residual Dry Matter minimum required in the fall, intended to prevent erosion. Fencing cattle away from creeks also seems to be insufficient to protect water quality. Tomales Bay is in non-attainment for coliform, nitrogen, and sediment, all of which come primarily from ranching and dairying operations. The N. District of the GGNRA grazing lands drain into Olema and Lagunitas Creeks, which deliver coliform, sediments, and nitrogen into Tomales Bay. When driving through this park, one can easily see that the rangelands are degraded, with almost no grasses left in many fields in the fall. Erosion channels are widespread and manure is near to many ephemeral creeks. In Bartolome, J.M. et al., "1987-2014 Residual Dry Matter Analysis..." for the seashore, done at UC Berkeley, Figure A.2 shows the residual dry matter data for the grazing leases and most violate the minimum RDM standard for the fall period

every few years. 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, as described to NOAA (see below), to limit grazing on ranches that violate their lease conditions.

The NOAA Fisheries Biological Opinion for the NPS livestock grazing program in PRNS (4/5/04) 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" (p. 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 and Schooner Creek and Home Ranch Creek. Table 2 in the Opinion shows that cattle have access to about 3% of Lagunitas Creek that is bordered by grazing, about a quarter of Olema Creek bordered by grazing, and a third of Drakes Estero similarly. The average for all creeks was 16%. NOAA staff observed bare soils in pastures adjacent to creeks. Another problem documented is lack of shade plants near to the creeks. Some efforts were made in the early 2000s to fence cattle away from creeks and to plant trees next to creeks. 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.

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) found no downward trends (improvements) in coliform, N, 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 coliform pulses after winter rainstorms. The Tomales Bay Water Quality Status and Trends Report (2002) found that dairies and cattle ranches contributed to coliform, N, 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. To not 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 early notice of these problems and so facilitate better commenting on the current NOI and Scoping document.

Please include detailed background information regarding the historic trends in environmental quality pertaining to range condition, water quality, bird abundance, wetland and riparian land conditions, and other issues in the DEIS affected environment section, so that the public can understand the motivation for the GMP amendments, what alternatives may be successful in improving environmental quality in the Seashore, and what standards are needed for mitigation measures.

3. Impact categories From the above description of the NPS mandates, both general and specific to grazing leases, we can see that improving the status of natural resources is required. From the above brief and incomplete discussion of the history of the affected environment, we can see that the impacts of grazing on wetland conditions; riparian area conditions; erosion; sediment, nitrogen, and coliform levels in creeks, Tomales Bay and Drakes Estuary; and other types of impacts historically experienced should be identified and evaluated in detail. Newer concerns, such as 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.

In the DEIS please perform a detailed evaluation of the environmental impacts discussed here.

4. Mitigation measures If the DEIS includes a detailed description of the NPS mandates and the history of ranching and its impacts on the affected environment, the NPS can then evaluate the impacts of the various Ranching Alternatives, the mitigation measures required in each, the impacts resulting after mitigation, and whether the alternative will restore the environment to an improved state. Since the leases were not adequately enforced in the past, specific implementation mechanisms must be adopted in the mitigation measures for the ranch leases, enforceable by third parties.

5. The biased application of the Conservation Framework to Only One Alternative Alternative B: Continued Ranching, the Proposed Action contains a conservation framework that is described later in the PRNS web site Scoping report. This framework will zone the ranches into Land Management Units, according to intensity of use. The zoning will limit ranch diversification activities to only 2.5 acres of additional land near to ranch buildings, for example. Pasture lands will be subject to conservation practices, to protect water quality and other natural resources and must be on slopes lower than 20%. This conservation framework is described as included only in this alternative and so will likely reduce adverse impacts only in this alternative, which is the NPSs proposed action at this time. Limiting this management policy to one alternative, of course, biases the DEIS to favor this alternative. The DEIS must remedy this mistake and apply the conservation framework to all alternatives, as well as possible. The framework may be interpreted as a set of preventative mitigation measures. Agencies must apply mitigation across all alternatives, as feasible.

Thank you for considering these comments.

#111

Name: Kozarsky, Daniel
Correspondence: c

#112

Name: Kozarsky, Daniel
Correspondence: Dear NPS, I am writing to urge you to terminate the grazing leases on Point Reyes. Cattle grazing destroys native flora, ruins the water, and is incompatible with public land use and the mission of the NPS. Tule elk are a rare species and should be allowed to graze throughout Point Reyes.

Thank you for your consideration of my comments.

#113

Name: Wheeler, Jennifer
Correspondence: More needs to be done to protect the Tule Elk and wildlife in Point Reyes National Seashore and we need to reduce the impact of ranching in our national park. If the elk can't live there and thrive then where can they live? We have completely altered the state of California and for that matter most of the United States. Please give wildlife a chance at survival and put their needs first over human wants. All wildlife needs our protection now more than ever with the climate change that is happening and the impact of human development. Find more room for the Tule Elk.

#114

Name: Linnane, David

Correspondence: Private ranches were bought out more than four decades ago, at fair market value and enormous taxpayer expense, to create the National Seashore. In 1978, Congress passed a law that livestock leases on these Park Service lands could be extended "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 his or her spouse." Beyond that point, Congress allowed, but did not require, the Park Service to issue ranch leases if ranching does not impair the natural resources and wildlife at the Seashore.

Obviously, the case for ranchers should be closed at this point. Cattle obviously degrade public lands and make them unsuitable for anything else. It's time to put science and land preservation up in front of decisions involving public lands. Our imperiled wildlife needs Congress to act in its defense and the cattle industry using public funding and subsidies should be ended immediately...the cost to the American Taxpayer is unsustainable and unwarranted, as well as unsupported by the majority of Americans.

#115

Name: Parker, Jennifer

Correspondence: Our family visited Point Reyes recently and were horrified that our public lands are being given away to private individuals for ranching and dairy.

The ranched lands at Point Reyes are largely coastal prairie, which historically occurred from northern Los Angeles County into Oregon. More than 90 percent of this plant community has been disturbed or lost to development. In other words, the coastal prairie, as well as the plants and wildlife it supports, is rare and deserves full protection and restoration.

When considering HR6687, do the right thing, to consider the needs and desires of all U.S. citizens - all of whom have a stake in Point Reyes National Seashore - as well as the needs of the land itself and the wildlife it supports. HR6687 should not be passed. Instead, allow the legal processes of environmental review and planning to go forward, and do not allow private interests to run roughshod over both the processes and the incomparable beauty and richness of Point Reyes National Seashore.

Let the National Park Service conduct its comprehensive analysis, and, based on the data, (1) determine whether or not ranching can continue without harming the environment or the experience of the millions of people who visit the national seashore every year, and (2) identify if any of the ranches should be phased out or have their operations modified. To preempt this process in favor of private interests would be a breach of the public trust.

PUBLIC LANDS BELONG TO THE PUBLIC NOT TO INDIVIDUALS, RANCHERS AND SPECIAL INTERESTS! DO THE RIGHT THING!

#116

Name: Moritsch, Barbara

Correspondence: Please do not support cattle over wildlife and wild lands in PORE. Evaluate all of the impacts of the cattle and ranching on the land, the native wildlife, and the visitor experience. Develop an alternative that phases out ranching, starting in areas that are the most adversely affected. Consider the long-term health of the land and nature on this unique piece of public land.

#117

Name: Ratliff, Joe

Correspondence: I am a retired BLM environmental specialist with a comprehensive background in the

preparation, analysis, and public review of environmental assessments and impact statements mandated by the National Environmental Policy Act (NEPA).

I also have extensive experience in managing domestic livestock grazing, and observing the resultant, negative environmental impacts to natural resources on public lands.

I have personally witnessed the serious, broad scale damage and destruction to native vegetation, soils, water, forest, range and riparian ecosystems that can occur from the mismanaged, long term overgrazing of public lands.

Currently, the many problems associated with poor grazing management in the west are being severely amplified by the serious long-term droughts, higher climatic temperatures and terrible wildfires now raging in California and other western states.

For these, and many other reasons, I do not support domestic livestock grazing on public lands.

Last, but not least, as a former BLM employee working in the Great Basin, I was shocked by the give-away mentality (through Congressional Action) of allowing ranchers to graze their domestic livestock for the ridiculously low fee of \$1.59 per AUM (Animal Unit Month).

I urge you to eliminate all domestic livestock grazing from this management plan!

#118

Name: Belles, Mark

Correspondence: The Mission Statement of the National Park Service 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".

Alternative F (No Ranching) is the only alternative that meets the standards of the mission of the National Park Service.

In the absence of Valid Existing Rights, all ranching operations should be terminated when Valid Existing Rights expire.

We all need to understand that the nearly two centuries of ranching activities have left an impact on the land that is difficult for us to assess. None of us alive today have ever seen these portions of the Park in an "unimpaired" natural state. I hope to live long enough to see this, but I certainly want future generation of Americans to see it.

#119

Name: Spotts, Richard

Correspondence: Dear NPS officials:

Please accept and carefully consider my following scoping comments for preparation of the Draft Environmental Impact Statement (DEIS) relating to management of lands and resources within Point Reyes National Seashore. I have visited Point Reyes National Seashore, and I deeply care about its proper management and protection.

I reviewed the Federal Register Notice of Intent for this DEIS and I generally agree with the described reasonable range of alternatives. I hope that these alternatives will be objectively analyzed and compared in the DEIS. I am concerned that there may be undue political pressure on NPS officials to favor narrow private livestock interests over the broad public interest when preparing this DEIS. I urge NPS officials to strongly resist any such pressure, and to be as fair, even-handed, and factual as possible when preparing the DEIS.

I believe that there are many important issues which must be addressed in this DEIS and thoroughly compared among the DEIS alternatives. These issues include:

- Private ranches were bought out more than four decades ago, at fair market value and enormous taxpayer expense, to create the National Seashore. In 1978, Congress passed a law that livestock leases on these Park Service lands could be extended "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 his or her spouse." Beyond that point, Congress allowed, but did not require, the Park Service to issue ranch leases if ranching does not impair the natural resources and wildlife at the Seashore.
- Heavy grazing by beef and dairy cattle is destroying the native coastal prairie, replacing native grasses with noxious weeds.
- Livestock contaminate streams and rivers with manure, resulting in some of the worst Clean Water Act violations in California for fecal bacteria, in streams that empty out onto popular public beaches.
- Tule elk are rare and imperiled, and the "elk preserve population is fenced into a narrow peninsula that lacks adequate water during drought, confinement that killed hundreds of elk between 2012 and 2014. The fence must come down, and elk, not livestock, should be allowed to thrive throughout Point Reyes National Seashore.
- Cultivation of "silage crops" on Point Reyes to feed cattle in Concentrated Animal Feeding Operations (CAFOs) destroys native habitats, and when silage is mown in Spring, kills ground-nesting birds and native rodents. This subsidizes unnaturally large raven populations, which in turn prey on the nests of the endangered snowy plover in their beachside nesting habitats.
- Dairy and beef cattle are infected with Johne's disease, a chronic wasting intestinal disease, which spreads to native elk and may be a public health and safety hazard as well.
- Cattle cause increased erosion and siltation in local trout and salmon spawning streams, threatening the survival of imperiled runs of coho salmon and steelhead.
- The high density of livestock, barbed-wire fences, and malodorous manure-spreading on the hilltops at Point Reyes is incompatible with the National Seashores legal charge to provide "public benefit, recreation and inspiration." The interests of 335 million Americans, and 7 million Bay Area residents, should take precedence over the interests of 13 ranching families who have overstayed their lease terms.

Please include me on the mailing list to be informed when the DEIS becomes available for public review and comment.

Thank you very much for considering my scoping comments.

Sincerely,

Richard Spotts Saint George Utah

#120

Name: McCrea, Donald

Correspondence: A solution that chooses one over the other is not acceptable. You can't solve problems from the same level of thinking/consciousness that created them in the first place. Let's get really creative and find a solution that respects the needs of both "sides."

#121

Name: Haubold, Peter

Correspondence: I am writing to ask that the park service do everything in its power to protect the elk population within Point Reyes. These animals have provided me with great joy to see them roaming on in that area, and I don't believe it is our right to remove them from this area. Please protect the elk -

Thank you

#122

Name: Rall, Ben

Correspondence: Native wildlife should take precedence on federal lands for numerous reasons:

Private ranches were bought out more than four decades ago, at fair market value and enormous taxpayer expense, to create the National Seashore. In 1978, Congress passed a law that livestock leases on these Park Service lands could be extended "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 his or her spouse." Beyond that point, Congress allowed, but did not require, the Park Service to issue ranch leases if ranching does not impair the natural resources and wildlife at the Seashore.

Heavy grazing by beef and dairy cattle is destroying the native coastal prairie, replacing native grasses with noxious weeds.

Livestock contaminate streams and rivers with manure, resulting in some of the worst Clean Water Act violations in California for fecal bacteria, in streams that empty out onto popular public beaches.

Tule elk are rare and imperiled, and the "elk preserve population is fenced into a narrow peninsula that lacks adequate water during drought, confinement that killed hundreds of elk between 2012 and 2014. The fence must come down, and elk, not livestock, should be allowed to thrive throughout Point Reyes National Seashore.

Cultivation of "silage crops" on Point Reyes to feed cattle in Concentrated Animal Feeding Operations (CAFOs) destroys native habitats, and when silage is mown in Spring, kills ground-nesting birds and native rodents. This subsidizes unnaturally large raven populations, which in turn prey on the nests of the endangered snowy plover in their beachside nesting habitats.

Dairy and beef cattle are infected with Johne's disease, a chronic wasting intestinal disease, which spreads to native elk and may be a public health and safety hazard as well.

Cattle cause increased erosion and siltation in local trout and salmon spawning streams, threatening the survival of imperiled runs of coho salmon and steelhead. The high density of livestock, barbed-wire fences, and malodorous manure-spreading on the hilltops at Point Reyes is incompatible with the National Seashores legal charge to provide "public benefit, recreation and inspiration." The interests of 335 million Americans, and 7 million Bay Area residents, should take precedence over the interests of 13 ranching families who have overstayed their lease terms.

#123

Name: Lewis, Ashley

Correspondence: NPS,

I am writing to express my strong opposition to any culling or removal of the Tule Elk population in Point Reyes National Seashore. A proposal to kill any number of elk would be disastrous and precedent setting, and would stray from the agency's philosophy of protecting and restoring native wildlife.

I am extremely opposed to the park service's proposal that would allow ranchers to diversify their livestock, such as allowing for poultry. This would equal a death sentence for bobcats and coyotes within the park that would normally not attempt to catch large prey like cattle, but would likely go after smaller livestock. We do not need these increased conflicts with the wildlife that should be protected!

The park service is proposing to potentially kill or remove perhaps the most iconic species of Point Reyes, the majestic Tule Elk are the highlight for many visits to Point Reyes, and the reason many make the trip in the first place. The careful efforts to restore their population from near extinction from over-hunting has been somewhat of a success story that many have followed, the population of 660 individuals must be allowed to continue to rebound in the only national park where Tule Elk live.

Additionally, allowing lethal removal of elk could set a precedent of removing other animals that come into conflicts with ranches, and this precedent cannot be set in Point Reyes, where Marin County residents overwhelmingly want to see wildlife preserved and protected as the first priority of the park. Cattle ranches should not be the priority of this land, they should have to take whatever measures to operate harmoniously with the existing elk population.

Finally, the park service needs to carefully evaluate the issues caused by dairies and ranches such as impacts to water quality, and include consideration on how issues like climate change and drought will affect the park's management in all future decisions.

Thank you for your time, Ashley Lewis

#124

Name: Herwill, Alice

Correspondence: I am appalled that the Park Service would consider culling the Tule Elk herd at Pt. Reyes National Seashore. A commitment to preserve agriculture within the Park's boundaries should not come at the expensive of the native species that have always been present on this land. It is absurd that we as taxpayers should be required to shore up unprofitable dairies and beef ranchers, that if left to pure market forces would have gone out of business years ago. The demand for dairy and for beef are declining across the nation as more people eschew animal products. Could these dairy and beef enterprises be profitable anywhere else, if they weren't receiving a deeply discounted rate to lease on publicly owned land at the National Seashore-I think not. Not only is the Park Service that provides this monetary incentive intending to make it a guaranteed right but you are also proposing to even expand agricultural pursuits. How could there not be conflicts with native wildlife and plants-it's inevitable when you plop down agricultural interests in the midst of them. Cattle are not a threatened species-I can see them on dairy and cattle farms across the state. I do not want to see them in Pt. Reyes National Seashore. I want to see the native wildlife. I also do not want to see the environmental damage cows and cattle inflict resulting in rutted land, raw manure, and silage spread over acres of the National Seashore that have been fenced off from access by the public. Not to mention that some of these dairy cows and cattle are infected with Jone's Disease which have infected the native Tule Elk and may be a health hazard to humans as well. The Park Service seems to not understand the difference between a national park and a commercial business. To give priority to agricultural interests within the park over the native wildlife is the opposite of what a national park should be. It is a truly distorted viewpoint to believe that the Tule Elk are a resource to be killed because of competition with subsidized domesticated animals. I am completely opposed to culling the Tule Elk for the benefit of private businesses-businesses that couldn't exist without feeding from the public trough. If all the dairy and cattle ranchers were removed from Pt. Reyes National Seashore, they would never be missed. People who want to consume animal products could buy from other businesses within the state. The Tule Elk and other wildlife are one of the reasons many people come to the National Seashore. The Park Service should keep that distinction in mind when deciding on their priorities within the National Seashore. **NO CULLING OF TULE ELK; MAKE EXISTING DAIRY AND CATTLE RANCHERS SUBJECT TO ENVIRONMENTAL REVIEW; NO EXPANSION OR SUBSIDIES TO THESE PRIVATE BUSINESSES PAID FOR BY THE TAXPAYER.**

#125

Name: Lauter, Stephanie

Correspondence: Save the elk!

The parties involved should work towards a compromise solution that honors the Park Service commitment to the beef and dairy ranches and protects the elk population. The fact that the elk are not listed under the Endangered Species Act should not be relevant here. They have been an integral part of Point Reyes for the last 40 years, drawing significant numbers of visitors to the park. We should all feel a duty and responsibility in their preservation as a species. Whether this requires adding more fences or possibly relocating a portion of the population to an area outside the park, such as proposed on American Indian land, or possibly other non-lethal solutions, preserving the elk should remain a priority for the Park Service, along with their commitment to the ranchers. A workable solution/compromise can be worked out and all sides should be willing to do their part to make this happen and serve as a model for the rest of the country.

Thank you for your consideration.

#126

Name: Rames, Linda

Correspondence: Linda Rames

November 13,2018

Re: GMP Amendment c/o Superintendent Point Reyes National Seashore

After studying the different proposals for the Point Reyes National Seashore as outlined by the National Park Service and visiting the area many times over the past 40 years, it is clear to us: 1. Ranching as it currently exists is decimating the park, leaving barren land and piles of cow manure rather than the open grasslands which would naturally occur in this area. Since this situation is exacerbated by dairy ranching, we feel that dairy ranching in the Point Reyes Estero region should cease. 2. The current cattle ranching operation could be given a five year lease on an experimental basis to see the effects of these animals on the land. 3. The Tule Elk are native inhabitants of the estero and should be left alone. The Park Service needs to remember that these animals were reintroduced to Point Reyes by their own act. This was a successful attempt to save a species from extinction and should be an act of which they are proud. If any type of management is attempted, it should not be lethal and it should not include removal. We are sure the Park Service is aware of the disgust caused by their efforts to eradicate the white deer of Point Reyes and wouldn't want to repeat that type of debacle. 4. Allowing the ranchers to institute poultry farming would be a huge mistake. This type of farming would encourage predation by coyotes, foxes, bobcats and other predatory animals, a situation which does not currently exist and should not be allowed to happen.

We agree that the park should be enjoyable to all citizens which is certainly not the case at the present time, nor does the current agreement follow the original terms when the ranches were acquired by the National Park Service. While we don't think the ranches should be immediately removed, an agreement such as the one drafted by the Park Service and Drake's Bay Oyster Co. could be implemented which would be more fair than allowing the destruction of the land to continue.

We hope that the National Park Service will take our concerns under consideration. This park could be a jewel and a beautiful example of native life and land on the California coast, which is what we believe it was meant to be when the ranches were purchased and when the Park Service brought the Tule Elk back to Point Reyes.

Sincerely,

Linda & Robert Rames

#127

Name: Kline, Matthew

Correspondence: The story of the Tule Elk is one that is truly remarkable. Their close call with extinction or should we say extermination by our hands, mostly by way of hunting and large scale cattle ranching, is a story that should never be forgotten. Today, the pressure on this species continues even when there are less than 5,000 of these majestic animals left in the world. This is a native and endemic California species that numbered an estimated 500,000 strong not all that long ago. Meanwhile 5.5 million head of cattle spread out across the entire State of California and close to 95 million roam the United States. Where is the level-headed, critical thinking, and sustainably balanced approach in that? Is there any room left for our iconic native wildlife in our iconic national parks? The Seashore is the only National Park where Tule Elk can be found. For those of us who enjoy spending time around wildlife and see the significant role they play in dynamic and healthy ecosystems, we are thankful Tule Elk still exists, but we are not naive either and understand well the research, management decisions, protections and priority they deserve going forward. The Seashore's own website 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 within this park, nevertheless ranching interests get priority. I'd like to be empathetic to the ranchers, but where is their empathy for the Tule Elk, the surrounding ecosystems, and the other rare and endangered wildlife? It's frustrating that ranchers have continually pressured our elected officials to do something about the elk "problem." But what if cattle is the problem. Why is our access diminished with fences everywhere in sight, along with fences for the elk, when it's the cattle that should be culled? We should be discussing the establishment of corridors for the elk to move, connect with and maintain a healthier population, not criticizing their grazing of "silage meant for cattle" as ranchers like to put it. We should be discussing trophic downgrading and shifting baselines of the Point Reyes National Seashore and the health or lack thereof of this unique and diminishing landscape. Many of us are well aware of the negative impacts ranching has on our last wild places and critically important sanctuaries; one only has to do their homework. Let's discuss the flow of tourism dollars into the park because people want to spend time immersed in and surrounded by more wild settings, not cows and fences. Learning about the many environmental issues we face as well as the ones numerous wildlife species are confronted with, not just here, but in other parts of the state and country, as well as abroad is very important to me. I've learned a lot about declining populations, shifting baselines and threatened species in the process, and truly the learning doesn't stop, it motivates me to do more. Wildlife and healthy ecosystems are being diminished everywhere. This is not fake news, this is a real significant problem facing all of us, and my guess is that you and the others working on behalf of our parks are well aware of it. Unfortunately it seems that for every single positive environmental step forward there's an overwhelming amount of negative developments also occurring. Our progress is slow and not nearly enough to turn this tide and I feel that it's upon us to push ourselves to earnestly do more. I strongly recommend that the National Park Service pursue the "No Ranching and Limited Management of Tule Elk Alternative" in updating its General Management Plan. Although I doubt this pioneering step will be taken for fear of backlash from ranching interests and its supporters, I cannot in good conscience recommend a less enlightened "alternative." Subsidizing ranching on public lands makes little sense, especially when the volume of land set aside for ranching interest (everywhere) already exceeds such an enormous amount and when the negative impacts associated with extensive ranching has been documented. Phasing out ranching over a fair and more than ample period should be considered, as well as exploring the issue of rancher compensation (even though ranchers have been subsidized for years already). For anyone who may criticize this approach, I would ask you to look around, study the issues and learn what is happening to our ever-diminishing ecosystems and declining wildlife populations in-whole. Head off in any direction and observe the countless spaces already set aside for agriculture, many right here at home in other parts of our community. Where is the sustainability in this approach? This is a subject that undoubtedly matters to many of us in the community, but it's also a subject that extends beyond, and rightfully so, because in the end there's always a much larger picture to consider, and just imagine for a moment what a special picture it could be.

#128

Name: Barnes, Larry

Correspondence: The "Pastoral Zone" is not limited on Earth; it's expanding with our growing population. People can see cattle grazing on land all over California (and the West, and the World); there is nothing special nor romantic about them grazing our nation's public lands.

There IS something special about native mammals grazing and browsing the land upon which they evolved. Point Reyes visitors can see domestic animals grazing private lands on their way to and from the National Seashore. Let them see native wildlife when they come to Point Reyes. Let there be more elk and deer (and mountain lions to feed on them) as we attempt to reverse a 200-300-year cattle-grazing history in one tiny corner of the West.

Should the Park be concerned about a growing population of wild ungulates (I support lethal removal of feral introduced deer) in the absence of adequate numbers of lions and black bears, I would rather allow human hunting of elk and deer than the continued grazing by private cattle on my public land.

Sincerely, Larry Barnes

#129

Name: Zelasko, Sandy

Correspondence: The open coastal prairies of Point Reyes need immediate attention. On a recent visit, obvious adverse impacts of ranching on soils, water quality, vegetation, wildlife and visitor experience were undeniable. There were piles of manure, muddy trails, accelerated erosion, weed-infested pastures and gigantic heaps of rotting vegetation throughout the area. I am sickened by this trend and can't keep quiet any longer. Policies should be put in place to limit ranching and instead favor wildlife. I will be the voice of those who cannot speak for themselves! Wildlife and Parks need our help. BE THAT HELP!

#130

Name: Rodney, Ray

Correspondence: I am not opposed to continuing agriculture at Pt. Reyes, recognizing that ranching was part of the agreements establishing the Seashore. But I believe that protecting the park's wildlife and habitats is the highest priority. It is important to address these questions: • Impacts on all wildlife species that use the 28,000 acres in ranching. What impact does ranching have on the wildlife that use these ranchlands? • Management standards the ranchers are held to. Using public land should require a high standard of stewardship. What standard ranchers are held to and what recourse does the NPS have if these are violated? How are the standards implemented? • An alternative that allows for ranch lands to be abandoned and restored to grazing habitat, if no family members are interested in ranching. • Criteria that would be used and how decisions would be made to decide to cull and/or remove elk from the park. • Provisions of the Huffman bill (HR 6687) that provide for management of elk by hunting and relocation to Indian lands, and for leases to anyone interested if there is no family member interested. How is the NPS ensuring an objective environmental review? • Indian tribes that are or would be interested in translocated elk, where they are located, and the reasons they would want the elk.

#131

Name: Strobel, Jeanine

Correspondence: Dear Reader, I would like to voice my strong support for protecting wildlife and habitat when considering management of Point Reyes. Point Reyes is one of the few, precious places in the Bay Area where one can see wildlife living freely. In any management plan - I believe wildlife protection is a priority. Thank you so much, Jeanine Strobel

#132

Name: Cha, Imok

Correspondence: The management should be focused on wild life protection. Do not open up to more people, more bikes etc.

#133

Name: Coughlin, Patrick

Correspondence: I strongly disagree with any efforts to take action to minimize the impact of Tule Elk for the benefit of beef and dairy ranching. The purpose of National Parks and public lands should be the preservation of wildlife and wild landscapes, NOT for-profit ranching. I support the alternative action that limits ranching in the park and allows Tule Elk to expand across their natural range.

Ranching and farmland are widespread across California, the landscape of Point Reyes is unique and should be preserved in its natural state, so that it can be visited and enjoyed by the public.

#134

Name: pierce, jack

Correspondence: Please provide public access as part of the General Management Plan Amendment, including provision of public access trails on ranch lands.

The EIR should discuss the ranch lands' existing lack of recreation and public access, and impacts to recreation due to the ranch lands being fenced off, gated, erosion and wildlife disturbance, and littered with NO Trespassing signs, even though it is public land.

How much revenue do the ranches generate? How much of this exclusive land use has been opened for public access within the last twenty years?

What is the size of (how many acres) the PRNS? How many miles of trails are there? How many picnic tables and campsites? What percent of the park area is allocated for trails, picnic areas and camping? What percent is allocated for exclusive ranch use, precluding the public use? Is this consistent with federal guidelines for public parks? What is the projected increase in public access as a result of plan implementation?

Please discuss opportunities, environmental impacts and mitigation measures to complete the Cross Marin Trail, techniques to allow public use of ranch lands, eliminating barbed wire and wildlife exclusion fencing from the park, improvement of ranch erosion, and reducing exclusive use by residences on the park land.

Please discuss the exclusive use of park land by PGE for a power plant off Taylor Park Road. How is this use consistent with Park goals, allowable and desirable uses? What review was completed to allow this PGE plant? What design features will be required to disguise this ugly use? Why is it fenced off from the public?

Why is Taylor Park Road gated off? It is a public road on PRNS lands. Why is the former railroad right of way closed off to the public?

In exchange for ranchers using public lands, mitigation measures should include opening the ranch roads for public trails, removal of all no trespassing signs, eliminating locked gates, removal of fencing, and construction of new public access trails, including a new pedestrian crossing of Lagunitas Creek.

Please include a discussion of how many private residences are within the ranch leased lands, if they are occupied by the leaseholders or rented out, and if any are rented for short term use (AirBnB). Please include analysis of revenue/cost, impacts, and consistency with National Park/PRNS goals. Please evaluate eliminating residential use by non-leaseholders.

Please discuss the current agricultural uses within the Park, how many cattle, sheep or other commodities are being produced? What is the agricultural capability of this land, what is the economic revenue, and what regulations does the NPS enforce regarding this agricultural use? Is cannabis production allowed? What is the net revenue to the public for allowing this exclusive use?

#135

Name: pierce, jack

Correspondence: Please include analysis of a new pedestrian crossing across Lagunitas Creek to allow completion of the Cross Marin Trail from Sir Francis Drake to Point Reyes Station.

#136

Name: Tucker, Kirsten

Correspondence: I enjoy visiting our national parks and am contacting you about concerns regarding the management of the Point Reyes National Seashore. 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 park's natural values, its native wildlife, archeological resources, and public use and enjoyment its highest priority. The GMPA must set standards and conduct monitoring to ensure that ranching does not damage park ecosystems or negatively impact wildlife habitat, endangered species, archeological sites, water quality, native vegetation, public recreation or the aesthetic natural beauty of the park. Ongoing private cattle grazing is incompatible with the purposes for which the Point Reyes National Seashore was established. Ranching at the Seashore has resulted in overgrazing, water pollution, invasive weeds, and reductions of native species, including some protected under the Endangered Species Act, which I know you support. We now know that cattle are the Seashore's #1 source of greenhouse gases that cause climate change. Tule Elk are an ecologically important part of the landscape of Point Reyes National Seashore. 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 Seashores, 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 would create conflicts with and pressure to kill native predators like bobcats, coyotes, and foxes.

Sincerely,

Kirsten Tucker

#137

Name: Honchell, Christina

Correspondence: I write to you as a concerned citizen, taxpayer and regular user of the Point Reyes National Seashore. I go there for the wildlife and the natural beauty. I go to see Tule Elk, bobcats, coyotes, raptors and other magnificent creatures. I write in opposition to the proposal to limit the number of Tule elk in the park; currently there are 100 elk and thousands of head of cattle. To eliminate any of the elk because of competition with cattle is immoral. You know that the herd has a disease that makes relocation impossible, so this is a death sentence. The Tule elk is an important part of our California eco-culture. I also write in opposition to the

introduction of additional farm animals into the park. The future of the magnificent predators would be put at risk if farmers feel threatened by their presence. Point Reyes is one of the few places we can go and count on seeing bobcats and coyotes in the wild.

Please do not make these changes which will change the nature of the park irrevocably and make it less than the gem that it is now.

Thank you.

#138

Name: Zipp, Jim

Correspondence: From what I understand the farmers now were supposed to be gone from the park a long time ago. Expanding ranching and farming and removing the mystical Tule Elk would be a major loss to a magical land.

#139

Name: Shaw, Mairead

Correspondence: It is abhorrent to think native elk roaming in a national park could be translocated or euthanized in favor of private cattle owned by ranchers. The ranchers who are over grazing their land (iex: need to have hay delivered to their land) are not practicing sustainable agricultural practices. This is a national park for all people to enjoy, not the personal property of big business.

#140

Name: BRINKMAN, CHRISTIAN

Correspondence: With regard to the potential new legislation, please do not take any actions that would involve potentially killing the native tule elk regardless of the current conflicts they have with the cattle, they should have the opportunity to remain in place. It would be a tragedy to remove all or many of these wonderful native animals from Point Reyes. Regards, Chris Brinkman

#141

Name: Carelli, Patricia

Correspondence: POINT REYES NATIONAL SEASHORE should be for preservation of land and wildlife to benefit the general public. It should not be used for private farming and ranching. It is a travesty that cattle outnumber elk and other wildlife, The Land should be managed for the benefit of native flora and fauna.

I speak for many friends and family who have enjoyed the wildlife in our parks when I urge you: Do not kill the wildlife, such as Tule Elk, but manage it for its best interest. Do not introduce additional farm (domestic) animals on land that should be reserved for wildlife. Do not allow row crops to be introduced on land which should host native flora. Do not allow expansion of private use of public lands.

Do remove all commercial cattle operations and other farming and ranching activity. Do return land that is leased (expired and current) for farming and ranching to nature.

Please POINT REYES NATIONAL SEASHORE

#142

Name: Buehler, Riley

Correspondence: There are 6,000 cattle in Point Reyes NS, and approximately 100 elk. Conversion of PRNS lands to row crops removes habitat for wildlife AND access for taxpayers. Native wildlife should not be killed/removed to settle a conflict with cattle/ranchers, no new domestic animals should be introduced. Keep our parklands protected!

#143

Name: Schiller, Karyn

Correspondence: I am writing to register my objection to culling elke so that farmers, whose leases have long expired, can further benefit from public lands. This is simply wrong. We are talking about a NATIONAL park. That means it exists for the benefit of all of us in this nation and not for a few farmers to benefit. The elk are wild and should not be limited because that is what a few farmers need. Let the predators at it, and let nature take its course. I strongly object to this plan.

#144

Name: Blackmore, Heather

Correspondence: I'm concerned about the impact of capping the Tule Elk in Point Reyes National Seashore ("PRNS"), as these animals should not be killed for the sake of cattle. I'm also concerned about the risks posed to the native plants and animals if the decision is made to prioritize farm animals or crops over them. PRNS is a gem and should be kept accessible to the public. We should not further reduce the natural habitat of the area's wildlife.

#145

Name: Chizmar, RE

Correspondence: Tule elk are rare and imperiled, and the "elk preserve population" is fenced into a narrow peninsula that lacks adequate water during drought. This unacceptable confinement has killed hundreds of elk between 2012 and 2014. Any reasonable person would agree that the fence must come down. Simply stated, elk, not livestock, should be allowed to thrive throughout Point Reyes National Seashore. What will you tell your grandchildren - - I was part of a generation that helped save the elk or I was part of a generation that killed them off?

It is well known that Private ranches were bought out more than four decades ago. This land was purchased at fair market value and enormous taxpayer expense - - the purpose was to create the National Seashore. In 1978, Congress passed a law that livestock leases on these Park Service lands could be extended "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 his or her spouse." Beyond that point, Congress allowed, but did not require, the Park Service to issue ranch leases if ranching does not impair the natural resources and wildlife at the Seashore. What do we know now? Heavy grazing by beef and dairy cattle is destroying the native coastal prairie, replacing native grasses with noxious weeds. Livestock contaminate streams and rivers with manure and this leads some of the worst Clean Water Act violations in California for fecal bacteria ... and this is in streams that empty out onto popular public beaches. This has to stop - - and so does needless ranching in this area. •

#146

Name: Noles, PsyD, Ana

Correspondence: I'm writing to comment regarding the Environmental Impact Statement (EIS) for a General Management Plan Amendment (GMP Amendment) for Point Reyes National Seashore and the north district of Golden Gate National Recreation Area. I am very concerned about the possible introduction of new farm animals to these lands as well as the introduction of row crops. These beautiful, mostly undeveloped lands are a priceless gift that we intentionally created for ourselves and our descendants so that all of us, the public, could use these

lands in a way that would bring us pleasure and inspiration. In a world that is more and more densely developed and populated, it is vital that we continue to protect these beautiful lands for both our mental and physical well-being. The native wildlife that thrive on these lands are part of that beauty and wonder, and their destruction, subsequent to destruction of their habitat, is unacceptable. Thank you, Ana Noles, PsyD

#147

Name: Mace, Sue

Correspondence: As I understand it, the Tule Elk have been residing peacefully on the Point Reyes Peninsula long before the white man set foot on the soil there, it is my understanding that Sir Francis Drake wrote about these magnificent animals when he came ashore at Drakes Bay. I am appalled at the idea that the park service could even consider removing the animals from the park. To use the excuses they have makes absolutely non sense to me what so ever. There are more cattle than elk, if anything the cattle make more of an impact on the parks flora than the elk do. The Park Service has engaged in thoughtless relocation of these wonderful animals, causing the deaths of dozens due to that thoughtlessness. Do not get me wrong, I am not against culling the population to keep them healthy as well as keep the surrounding floral population healthy as well, however completely removing these animals from their homeland for whatever reason is being rationalized is against everything I believe in, First we wipe out the Native peoples, negatively impact the flora and fauna for two centuries and now ALL OF A SUDDEN, the Tule Elk are a problem, I don't believe it. I have visited the park since its founding, have lived in Marin County for a good decade before the land was ever thought about being made into a park. I frequent the park at least a dozen times a year, I have brought friends from the other side of the country and the other side of the world to appreciate the beauty and majesty of the park and its residents, which includes the flora, fauna, mega fauna and the ranches. There is no earthly reason after all this time to decide to decimate one species. None. I will be asking everyone I know to write in to protest this insanity.

#148

Name: Kerze, Leila

Correspondence: Dear NPS,

Please leave Point Reyes National Seashore and its ecosystem in peace as much as possible. The ranching that is already done there is bad enough. Short term profit gains from ranchers are minuscule in confrontation with the benefits we receive from the thousands of years it took to develop the delicate ecosystem within the park.

Sincerely, Leila K

#149

Name: kellogg, bonnie

Correspondence: It seems time that the sweetheart deal given to cattle ranchers in Pt. Reyes National Park should start winding down, instead of having NPS support to become MORE LUCRATIVE FOR THE FARMERS/RANCHERS at the expense of the native wildlife we have there.

The farmers/ranchers have had the land (and the profits from it) long enough that they should already have a relocation plan for THEMSELVES, not for our endangered Tule Elk, elk which are sick DUE TO THE WASTE FROM THE CATTLE that these farmers/ranchers have on the Parks' property.

I have seen our tax dollars spent to build unsightly barns for individual ranchers in the name of "land conservation." What a farce. It's time for NPS to work for the CITIZENS and the ANIMALS and not for the private ranchers.

There are plenty of places in California where cattle, sheep, goats, etc. can be bred and raised without taking away the rights and privileges of citizens to use the land.

Please do NOT give the ranchers/farmers more. Please start LIMITING what they can do. Please have them REDUCE THE SIZES OF THEIR HERDS and begin their own evacuation program to get off our National NATIONAL (NOT their PRIVATE) Parks land.

Don't put our Tule Elk and other endangered species in danger by allowing farmers to kill them because they are a danger to the animals that SHOULD NOT EVEN BE ON THESE LANDS TO BEGIN WITH.

#150

Name: Holmes, Christine

Correspondence: I strongly feel that the Tule Elk herd should NOT be reduced by lethal methods. What is wrong with the NPS? First you let them die of thirst, then you decide to go out and kill them to protect cows? What do you think a National Seashore is, anyway? Of all places and organizations, you should be protecting wildlife and their ranges. How very short sighted it would be to cull the Tule Elk herds. Practicing some targeted birth control if necessary to keep the herds healthy on the land available to them may be done, but only under intense scrutiny and oversight by the public.

While dairy and beef cow farming is, I believe, a nice and historical component of Pt. Reyes, if those farmers' demands run counter to the benefit of wild life and wild lands, I am heartily against the continuation of farming there. If they are willing to maintain the status quo, or scale back their grazing needs to accommodate the herds, the farming might continue in harmony with wild nature.

Wild nature is what people expect, need and love about Pt. Reyes. The Tule Elk should be protected and cherished on this land. Farming is a vastly subordinate activity and use of the land on Pt. Reyes.

Sincerely, Christine Holmes

#151

Name: mahoney, denis

Correspondence: The elk at Point Reyes were the highlight of a visit in 2017. They offer an opportunity to view wildlife in a natural setting, something that is difficult to experience. Expanding farming at this location will not only negatively impact the elk, but also many other wild animals and birds. Please do not proceed with this plan.

Denis Mahoney

#152

Name: Morrissette, Matthew

Correspondence: The plan to extend the ranching leases on Point Reyes National Seashore must stop. The number of protected places that support our ability as a nation to enjoy the wildlife of our country is dwindling. Any oasis of wildlife and nature should be protected. Protect the Tule Elk population. We should not be capping their population we should be restoring it. This is a perfect example of policy that only helps a small percentage of the population at the expense of the majority.

I strongly oppose this plan.

#153

Name: N/A, N/A

Correspondence: I frequent Point Reyes National Seashore at least 2 times a month and the cows and their feces are an eye sore in an otherwise pristine park. When I take visitors to PRNS they are always taken a back by the smell of cow feces and dirt associated with raising cows. The park should be restricting the ranchers activities. The elk are not the problem.

#154

Name: Reichmuth, Michael

Correspondence: The GMPA should take into consideration federal recovery plans for Central California Coast (CCC) ESU coho salmon and CCC DPS steelhead. All agricultural activities should be managed in a way that ensures no negative impact to ESA listed species residing within Point Reyes National Seashore (PRNS) managed lands. In particular, PRNS should require stream riparian buffers for all stream segments within agricultural areas that are at least 2.5 times the bankfull width and ensure that sediment from agricultural induced erosion is captured before entering waterways that are hydrologically connected to CCC ESU coho salmon and CCC DPS steelhead habitat.

#155

Name: Laybourn, Jim

Correspondence: As a frequent visitor to Point Reyes, drawn to it's natural beauty and especially it's wildlife, I am appalled at the continued dominance of the cattle industry over Point Reyes and it's management. Now is the time to restore this area and it's land to a natural state, not despoil this PUBLIC LAND with more domestic animals and row crops.

I view any expanded agricultural use and introduction of non native species to Point Reyes as a violation of the NPS mission to protect lands under it's control from impairment, for current and future generations.

Instead of allowing continual impairment of this tremendous and unique public seashore, the NPS should begin phasing out ALL cattle ranching and commercial agriculture activity on leased lands.

Tule elk should be allowed to roam the entirety of Point Reyes without risk of bovine diseases.

Row crops should never be allowed at Point Reyes, or any other commercial activity that would degrade the natural qualities there and contribute to the loss of native habitat and wildlife. I am especially outraged by the idea that public lands would be closed to the public so that commercial operations that would further degrade these public lands could occur.

My understanding is that the ranchers who were bought out were well compensated for their lands. They should take their livestock operations elsewhere.

I proposed that not only all livestock be removed from Point Reyes but all ranch buildings be removed and all lands within it's boundaries returned to a natural state, and game fences removed as well!

There are literally millions of acres of lands more appropriate for cattle grazing in California. Point Reyes should be a WILD place for WILDLIFE not livestock!

#156

Name: Moeller, Doug

Correspondence: Please do not curb the herd of Tule Elk for the benefit of cattle ranchers in the Point Reyes National park.

#157

Name: M, Dominique

Correspondence: Please DO NOT murder one animal (elk) so that another animal(cows) can graze and then also be murdered down the line. These Elk are critically endangered. They are part of this ecosystem & have been since before the area was colonized. Cattle Ranching is one of the leading causes of climate change & we here in the California are certainly in the midsts of related abnormal & extreme conditions.

#158

Name: Myles , Marla

Correspondence: No thinning of the Elk on federal land. The rancher is a tenant and those elk deserve to be there more than the cows. I'm a taxpayer and I vote No on killing the Elk.

#159

Name: Gardner, Kirsten

Correspondence: Please do not hurt or kill Tule Elk or other native wildlife to protect private interests on public lands. Animal agriculture causes tremendous harm, is a top contributor to climate change, and should not be enabled in an evolving and progressive society that values the environment and the lives of human and non-human animals.

#160

Name: Broadbent, Dawn

Correspondence: I want our National Parks left in the pristine condition that they started out, unfortunately that is not possible, many of these areas are sacred to the indigenous people and their ancestors. Please leave these areas to those that protect and defend the wild and natural.

#161

Name: Polick, Melissa

Correspondence: As a United States Citizen, and taxpayer of Marin County for the past 23 years I am submitting comments on My Total OPPOSITION to "Relocate" Or "Kill" Any of OUR Elk in Point Reyes in Our Point Reyes National Seashore area. This is an OUTRAGEOUS Plan, and I, as a taxpayer demand that Indians Or Park Service people Do NOT Remove, Or fence off, OR KILL ANY of OUR Tule Elk.

This plan introduced by Huffman is a Selfish and cruel give a way to Farmers that are Already Paid fo have Cattle and Cows on Our public land. NO MORE of This Dollar \$\$\$\$ Give away! NO!

Again there is absolutely ZERO Reason to ever think of either Removing OR Killing Our Native Tulle Elk.

Wildlife and the cattle that are already there, Can co-exist as they ALWAYS Have done in OUR Point Reyes National Seashore!

Again, NO REMOVAL and certainly NO KILLING of OUR Tulle Elk - -- NO!

Listen to the Will of the California people - Now.

#162

Name: Jarocki, Martha

Correspondence: Thank you for the opportunity to comment on the Point Reyes National Seashore General Management Plan with regard to the Tule Elk population. I am in favor of alternative D or E -- ranching on the peninsula should be a secondary consideration to the continued survival and growth of the Drake's Beach Tule Elk herd. This is an animal that has nearly been lost to us, and the preserve at the Seashore is an important part of their recovery.

The farming at the Seashore is a historic activity, but should not be continued at the expense of bringing back this threatened remnant population of elk. The value to the nation of the Seashore lies in its wildness there is nothing like this place anywhere else in California.

Please respect the importance of the elk.

Thank you.

Martha Jarocki

#163

Name: GOLDTHWAIT, ROSE

Correspondence: Private cattle ranchers should have no bearing on our National Public Parks and land! This is natural territory for elk, and they should be protected.

Prior to European colonization the species was half a million strong, and due to human destruction of their territory are now only 3,800 between 22 herds scattered throughout the Pacific Northwest

Cattle ranching is one of the leading causes of greenhouse gasses & this month in particular we are witnessing some of these effects: record storms, fires & drought. It is time to limit the cattle ranchers within the park & elsewhere.

The Elk are a popular tourist attraction & if they were allowed to spread throughout the park it might creat more economic benefit to the area.

This is their native ecosystem & allowing them to thrive makes sense for the heard, for the land & is the only morally the correct course.

#164

Name: Haythorn, Joseph

Correspondence: I strongly oppose the proposal to expand the agricultural use of park land in the Point Reyes National Seashore. I think that rather than expand the use the Service should terminate the non-park use currently allowed. It seems that the proposal violates the mission statement on the Service's website. I have driven through this area traveling to Crescent City and marveled at the beauty of the flora and fauna. These places are rare in this country, especially when accessible so easily to so many people in this country. I further believe there is no middle ground, once the wild nature is lost it will never return.

#165

Name: Asel, Josh

Correspondence: How do you get rid of the symbol for conservation success at Point Reyes National Seashore? By proposing a "compromise" that would eliminate what is essentially an Endangered species without the official listing just to support ranchers who already are sitting on 28,000 acres of ranch land in Point Reyes and Golden Gate National Recreational Area.

My name is Josh Asel, I'm a Conservation Photographer and Ethics Committee Member with the North American Nature Photography Association.

It took decades upon decades to bring back what was thought to be an extinct species, and now, in a time where the Trump administration seeks to defund and decimate wildlife and park protections, the Point Reyes National Seashore Park Service is somehow, astonishingly actually entertaining the idea of killing off or evicting a large percentage of an endemic species to California; a Park Service which failed to report in a timely manner the deaths of already approximately 250 Tule Elk individuals in 2014 and who have not updated their general management plan since 1980, which has not accounted for the 3 million visitors per year the park receives and also climate change. Thousands of acres were added to the Point Reyes National Seashore in the 1970s, which were intended for public recreation and to preserve the wildlife and natural resources at the Seashore. Instead, the Park Service leased those lands to cattle ranchers.

The ranchers live on lands that weren't even intended for them in the first place and now their demands grow beyond the reasonability and morals of preservation and conservation. It's no secret the ranchers continually abhor the presence of Tule Elk and other wildlife that has been in Point Reyes much longer than before the settlers first arrived and wiped them out. Their proposed expansion of farming and agriculture will only stoke the flames of wildlife conflict continually and they will keep trying to push legal and geographical boundaries until they get what they want, an entire take-over of Point Reyes National Seashore. So, where does their greed really end? Bringing in more cattle doesn't help climate change either, with methane gases from ranches already adding to the costly repercussions of a degrading ozone layer. Keeping the "organic" label ranches are worried about losing and increasing human expansion into wildlands is not more important than preserving the wildlands themselves and the biodiversity found within it.

The Park Service of Point Reyes National Seashore needs to walk before they can run. And the ranchers want to sprint to the finish line before the Park Service has a chance to really get their logistics in order. The Park Service should realize that being pushed around by the ranching community will not get them anywhere. Favoring enterprises over conservation of natural resources is what puts the fragility of our planet's ecosystems in grave danger, and therefore, all living things. This has to stop!

The majesty and abundance of wildlife that made Point Reyes a National Park is what we truly hold close to our hearts. It's also what is best for the health of the planet- -that is not a coincidence. The Tule Elk are the stars in an amazing array of animals found at Point Reyes, which brings in millions of dollars a year to the park and surrounding areas from the 3 million visitors attracted to Point Reyes' biological blessings each year. The Park Service should not be so eager to dishonor and discredit the historic creation of the Point Reyes National Park and themselves in a trade for more cattle and crops. When we lose our wildlife, we lose our morality.

Just because the Tule Elk were somehow never listed in the Endangered Species Act, does not mean that it is right to displace or, Heaven forbid, kill off an iconic species! Or any species for that matter. The wildlife have every right more to be at Point Reyes than an accumulation of agricultural settlements bent on furthering their own prosperity through pushing and shoving a service that should obviously be more focused on the preservation of nature.

Another Park Service in North Carolina recently tried to kill off the last of a Critically Endangered Species and the USA's only endemic terrestrial predator, the Red Wolf. There are other examples too of the NPS trying to expel, eliminate, or otherwise go against the wildlife for which the National Parks were created. So my question is, when

did the National Park Service become the enemy of wildlife and science-backed conservation? Regardless of the answer, the NPS in Point Reyes and elsewhere needs to get back to their roots where they belong: protecting the future of nature and planet Earth.

#166

Name: Cross , Cynthia

Correspondence: Please do not cull the point Reyes elk. People from all over the world come to pt Reyes to see them. Ranchers need to coexist. Thank you

#167

Name: N/A, N/A

Correspondence: The National Park Service Organic Act created the National Park Service to "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." The National Park Service was designed to protect the scenery of places like Point Reyes National Seashore and the wildlife, such as the tule elk, that inhabit those places. Apparently, the National Park Service is under the misconception that it's purpose is to grant more protection to ranching activities at the cost of protecting the landscape and its natural flora and fauna. Do not move forward with this plan.

#168

Name: Albion, Martin

Correspondence: Dear sirs and madams, I am writing in support of the ranchers in West Marin. With longer leases they can better care for the land and it's cultural and natural resources. This is especially important now with respect to fires . The fuel load goes down when you have grazing. The ranchers are such good stewards of the land and have cared for it for many decades, even before the National Seashore was formed. They know best how to manage the land and control stock density, water management, brush and weed control. If it wasn't for the ranchers selling their land in the first place, there would not have been a Seashore as we now know it. Recognizing ranching was in the initial agreement for establishing the Park.

Thank you for your attention in this vital decision making process. Martin J. Albion, MD November 15. 2018

#169

Name: Levin, Cathy

Correspondence: Hello,

I was really hoping to attend one of the public meetings on this issue, but the air was just too smoky, so I decided to stay home and submit my comments electronically instead.

I have no special ties to any ranchers or the Park Service or environmental groups. I am just a 22 year resident of Marin, who cares a lot about Point Reyes.

In my opinion, the plan for Pt. Reyes should not be characterized as cows VERSUS elk. Point Reyes can, and should, accommodate both.

The Park Service should absolutely honor the commitment they made to the ranchers when the park was created. That is just plain decency. The ranchers entered into the deal to sell their land, and operate under leases from the Park Service in good faith. They could have said NO, way back in 1962. Don't renege on the agreement.

Somebody commented in a recent SF Chronicle editorial that they were "horrified" to see cows and dairy ranches in Point Reyes. That baffled me. I could understand surprise, but horror?? I find the sight of free-grazing cows and the weather-beaten historic dairy ranches to actually be quite lovely and pastoral...And they were there well before the Park was created. Leave them alone! However, I do NOT support any further expansion of agriculture within the park boundaries.

The introduction of the elk in 1978 was a brilliant land use idea for the area. I have hiked Pierce Point many times and often bring out of town visitors there to see the coastal scenery and the magnificent elk. Since the herd has thrived so well, and outgrown its space, herd management, though unpleasant to many, is clearly necessary. It is my opinion that the best options are:

- Relocate the herd at Limantour Beach and any other elk that are encroaching on the ranch lands. To where? I don't know, but I am sure there are smart people with some good ideas.
- Preserve the entire current herd at Pierce Point. Utilize judicious sterilization to maintain a stable population size there.
- Build really good fences to keep them there. If any get out, round them up, take them back, and figure out how to fortify the area they escaped from.

We can have elk AND cows. We can have fair treatment of the pre-existing ranchers AND conscientious preservation of Point Reyes National Park.

It is not helpful to line up on adamant either/or "sides" - let's work together for a constructive and inclusive solution.

Cathy Levin

#170

Name: Albion, Linda

Correspondence: In 1962 the Park Service made a commitment to preserve agriculture in exchange for the sale of ranch land. It saved this area from being developed and we now have all this wonderful, pastoral land instead of mass development. We support longer lease agreements for the ranchers so they can be better stewards of the land. In 2013 former US Secretary of the Interior Ken Salazar, promised the ranches 20 year leases, which did not happen. We need to help make this happen now!

Here are just three reasons why:

With the increased security of a longer lease, the ranchers would be better able to take care of the cultural and natural resources. Because: This allows for planning. It saves NPS time and money with annual compliance meetings between ranchers and PRNS continuing. It shows a commitment by the Dept. of Interior that ranching will continue. The park service generally has limited agricultural experience and there is a high rate of turnover with staff responsible for working with the ranches. Ranchers are the only land stewards with institutional knowledge of the resources and are constantly educating new PRNS staff about ranching and dairying. The EIS must evaluate the advantages of creating an Agricultural Advisory Committee. Here's why: Agreements would not be forgotten or overturned. Local agricultural expertise could be included in decision making. Local resource conservation experts would be included in decision making. The local community could be included in decision making. Individuals with long-term knowledge of the seashore ranches and dairies would be involved. 3. The Park service should encourage operational flexibility for the ranchers - including the implementation of best management practices including brush control, weed control, stocking density, water system improvements, fencing and other practices that have been shown to sequester atmospheric carbon in rangeland soils. This

encourages better stewardship Allows quicker decision making to help ranches remain viable It helps the preserve the working landscape It's better for natural resources And importantly now it can help prevent fires! Grazed lands lessen the fuel load.

#171

Name: Leinberger, Anna

Correspondence: National Parks should be used to preserve wildlife for all of us to view and enjoy, and not for the benefit of for-profit ranching. Please protect our beautiful planet!

#172

Name: Griffin, Patricia

Correspondence: Pt. Reyes is one of the last areas that represent our California heritage. It's a national destination for so many people in this country and it has been so well managed for so many years. There are many practical reasons this agricul culture should be maintained.

1. The Park service should encourage operational flexibility for the ranchers - including the implementation of best management practices including brush control, weed control, stocking density, water system improvements, fencing and other practices that have been shown to sequester atmospheric carbon in rangeland soils. This encourages better stewardship Allows quicker decision making to help ranches remain viable It helps the preserve the working landscape It's better for natural resources And importantly now it can help prevent fires! Grazed lands lessen the fuel load.

2. The park service generally has limited agricultural experience and there is a high rate of turnover with staff responsible for working with the ranches. Ranchers are the only land stewards with institutional knowledge of the resources and are constantly educating new PRNS staff about ranching and dairying. The EIS must evaluate the advantages of creating an Agricultural Advisory Committee. Here's why: Agreements would not be forgotten or overturned Local agricultural expertise could be included in decision making Local resource conservation experts would be included in decision making The local community could be included in decision making Individuals with long-term knowledge of the seashore ranches and dairies would be involved.

3. With the increased security of a longer lease, the ranchers would be better able to take care of the cultural and natural resources. Because: This allows for planning. It saves NPS time and money with annual compliance meetings between ranchers and PRNS continuing It shows a commitment by the Dept. of Interior that ranching will continue.

Places in the world like Pt. Reyes can never be recreated once they are ruined. Please be thoughtful in your choices.

Thank you Patricia Griffin

#173

Name: De Leon, Marina

Correspondence: Daniel et al., 2010 states that "Understanding the trends and determinants of meat consumption in the U.S., where meat is consumed at more than three times the global average (5), should be particularly pertinent to researchers and other public health professionals aiming to reduce the global burden of chronic disease." U.S. meat and dairy consumption is out of control, and it is the partial responsibility of the government to support healthier lifestyle choices of citizens by sustaining national parks with natural wildlife and diswading cow farmers to take over public land for personal gain. As i'm sure you are aware, wildlife and natural environments have benefits for individuals and societies that are difficult to measure, but are nonetheless imperative for health and peace. And, many of our natural environments are already eradicated yearly due to

development and agriculture. I love the elk in Point Reyes and I have spent a lot of time there enjoying their presence. I have absolutely no interest in giving up public land that I use so farmers can graze more cattle. If farmers are having trouble with their cow business then it is time for them to convert their farms to more plant-based agriculture instead of forcing a national park to conform to their needs. I am deeply disappointed by the NPS that they would even consider reducing the population of this herd of elk. Please hear my comment and know that my statements are representative to thousands of additional Californians who may be too busy to comment due to the devastating wildfires affecting us all. We are vehemently opposed to the destruction of precious wild elk for the personal gains of self-interested cow farmers.

References:

Daniel, C. R., Cross, A. J., Koebnick, C., & Sinha, R. (2010). Trends in meat consumption in the USA. *Public health nutrition*, 14(4), 575-83.

citation (5): Speedy AW. Global Production and Consumption of Animal Source Foods. *J Nutr*. 2003;133:4048S-4053.

#174

Name: Hu, Jim

Correspondence: I am opposed to the proposal to destroy wild elk in Point Reyes NP in order to create more grazing land for cattle. The NPS is not responsible for the profits of cattle farmers, it is responsible for protecting wildlife and natural environments. Please do your job and protect the elk at Point Reyes.

#175

Name: Bouley, Kenneth

Correspondence: As a local resident and frequent visitor, I am strongly opposed to the expansion of commercial ranching or agriculture in Point Reyes National Seashore and any but the most humane handling of the Tule elk and other wildlife in the park. I think any killing of the elk is unnecessary, unjustifiable and unethical. I favor alternative F, no ranching whatsoever and the expansion of the elk herd and other wildlife in the park. The environmental impact of the ranches should be stopped and rolled back, the wilderness restored as much as possible. I object to the continued public subsidy of environmentally harmful, private and for-profit activities on public lands, which inhibit public access and more importantly degrade habitat and environmental health. There are too few parks, too little open space, too little healthy habitat. I would be in favor of plans to stop the leases and transition the businesses off public lands.

#176

Name: Cady, Cynthia

Correspondence: Please continue to support ranching in the Point Reyes National Seashore area.

We would not have that land available if not for the cooperation of the ranchers in 1962. They deserve our support and respect; not only that, the Park Service made a commitment to preserve the agricultural heritage in exchange for the land.

We need to honor that commitment.

The ranchers have been excellent land stewards and can continue to be so with the security of longer leases.

Additionally, we ****need**** local agriculture. The Park Service should encourage ranchers to continue to maintain and improve weed and brush control, water improvements and other carbon-saving measures.

Last but not least: Well-managed grazing is a huge fire prevention measure.

Please save our ranches! We love our ranchers and they deserve to stay!

Thanks,

Cyn Cady Woodacre

#177

Name: N/A, N/A

Correspondence: It would be so very sad to see the lovely Tule Elk disappear from their beautiful habitat. Since they are an endangered species I feel this would a poor decision to remove them from Point Reyes National Seashore. Please reconsider.

#178

Name: Stewart, Cameron

Correspondence: Hi - I support the Marin County Bike Coalition's suggestions.

1. A new trail between Devil's Gulch and Platform Bridge through Cheda Ranch.
2. Adoption of social trails off Bolinas Ridge for better connectivity and a single-track trail experience.
3. Extend the Olema Valley Trail to Bolinas on the east side of Highway 1.
4. A plan to connect the Cross Marin Trail into Point Reyes.
4. A more bike-friendly permit application process for road and mountain bike events in the park, including along Bolinas Ridge and out to the lighthouse.
5. Bike access to all ranch roads in the pastoral zone that are already open to pedestrians.

Thank you, Cameron

#179

Name: Anderson, Kevin

Correspondence: Please consider the following additions to make cycling accessible, convenient, and visible in these amazing areas:

A new trail between Devil's Gulch and Platform Bridge through Cheda Ranch.

Adoption of social trails off Bolinas Ridge for better connectivity and a single-track trail experience.

Extend the Olema Valley Trail to Bolinas on the east side of Highway 1.

A plan to connect the Cross Marin Trail into Point Reyes.

A more bike-friendly permit application process for road and mountain bike events in the park, including along Bolinas Ridge and out to the lighthouse.

Bike access to all ranch roads in the pastoral zone that are already open to pedestrians.

#180

Name: N/A, N/A

Correspondence: The following should be addressed in the EIS for the Amendment to the General Management Plan for Pt. Reyes Seashore and the north unit of GGNRA lands that are leased for ranching: 1. Impacts on all wildlife species that use the 28,000 acres in ranching. Some avian species benefit from grazing, as long as there is not overgrazing. What impact does ranching have on the wildlife that use these ranchlands? 2. Management standards the ranchers are held to. Using public land should require a high standard of stewardship. What standard ranchers are held to and what recourse the NPS has if these are violated. How are the standards implemented? 3. An alternative that allows for ranch lands to be abandoned and restored to grazing habitat, if no family members are interested in ranching. 4. Criteria that would be used and how decisions would be made to decide to cull and/remove native elk from the park. 5. Provisions of the Huffman bill (HR 6687) that provide for management of elk by hunting and relocation to Indian lands, and for leases to anyone interested if there is no family member interested. How is the NPS ensuring an objective environmental review? 6. Indian tribes that are or would be interested in translocated elk, where they are located, and the reasons they would want the elk.

Thank you for your consideration of these critical issues.

#181

Name: Gourley, Gato

Correspondence: I grew up in Point Reyes Station and still have family and many friends in the area. I also love to mountain bike. I've wanted to be able to explore the trails of PRNS on my mountain bike for a long time - it would be an incredible experience to open up PRNS trails to this large and diverse user group.

#182

Name: Jackson, Eric

Correspondence: I support Marin County Bicycle Coalition's call for:

A new trail between Devil's Gulch and Platform Bridge through Cheda Ranch.

Adoption of social trails off Bolinas Ridge for better connectivity and a single-track trail experience.

Extend the Olema Valley Trail to Bolinas on the east side of Highway 1.

A plan to connect the Cross Marin Trail into Point Reyes.

A more bike-friendly permit application process for road and mountain bike events in the park, including along Bolinas Ridge and out to the lighthouse.

Bike access to all ranch roads in the pastoral zone that are already open to pedestrians.

#183

Name: Isadore, Megan

Correspondence: I've lived near PRNS for 20 years, and it's one of my favorite places on this planet. I simply love it. I feel the land rolling out before me to the sea the way I feel my own breath moving through my body, and I feel it's that important to my life. When I see a coyote with mange, I hurt. When I see an elk with barbed wire caught on his antlers, I fret and worry. When I see cattle stomping all over our fragile dunes and wetlands, I ache for the injury to the land. When I see ravens following threshers to pick off the injured birds left behind, I'm horrified.

When I see ranches unkempt and dirty, with filthy yards sending runoff into our waters, I fear for the fish and water birds. I'm as protective as a mother otter with her young. When I teach the students of Tomales High School, some of whose families have worked those ranches for generations, I worry about what will become of them and of their families. I worry about the substandard housing that many of the ranch workers inhabit and the limited opportunities open to them and to their families. I'm not insensitive nor insensible to the needs of either ranch workers or wildlife.

I'm troubled by some of the possibilities suggested by the GMPA alternatives. I'm most concerned about the protection of natural resources when that goal comes into conflict with protection of ranching interests. I do not want to see ranching activities like row-cropping, chicken, goat and sheep husbandry allowed or encouraged in any way. Wildlife is already at risk in the Park due to ranching activities. Before considering allowing new activities, the Park should analyze their effects and explain how they would be consistent with wildlife protection. If chickens and sheep are allowed, what will happen to the coyotes and bobcats that will prey on them? What about rabbits and row cropping? Are rodenticides used already, and would their use be increased?

Already, Park rules are not followed by some ranchers, and there appears to be little recourse. There should be a transparent process for dealing with this issue, so that the public can be confident that Park resources are being protected. Fences are not maintained as it is; I can't imagine that increasing allowable ranching activities would do anything but increase those problems and open both ranchers and Park staff to constant additional pressures. The GMPA needs to explain how the Park would deal with those pressures. If it can't deal with those pressures, additional ranching activities shouldn't be allowed. Water quality suffers from runoff, but I find no water quality testing results available from PRNS. How will water quality be protected going forward, by whom and how transparent will the process be? What about use of pesticides and fertilizers? How will that be managed and made transparent?

And the elk situation...there is no instance in which I would prioritize managing the elk, or any wildlife in the National Park, for ranching needs. The Park's mission says that in general, plant and wildlife community needs should to be protected over ranching operations. This is a National Park, and while ranching is a historic use of the park and widely accepted, it has to be compatible with the protection of the park's wildlife and plant communities. When there's going to be a collision between ranching and the park's natural resources, ranching has to yield.

Thank you for the opportunity to comment.

Megan Isadore

#184

Name: Petersen, Richard

Correspondence: I am writing to encourage NPS to open more trails and land to mountain bikers. In particular, the Pt. Reyes National Seashore is near one of the largest and fastest growing populations of mountain bikers, many of whom want the following:

- 1) A new trail between Devil's Gulch and Platform Bridge through Cheda Ranch.
- 2) Adoption of the social trails off Bolinas Ridge for better connectivity and a single-track trail experience.
- 3) An extension of the Olema Valley Trail to Bolinas on the east side of Highway 1.
- 4) A connection between the Cross Marin Trail into Point Reyes.
- 5) Bike access to all ranch roads in the pastoral zone that are already open to pedestrians.

Mountain biking is a low impact and popular activity in comparison to other activities currently permitted in Pt. Reyes, most notably equestrian activities. Further, mountain bikers have increasingly demonstrated the ability to provide trail maintenance services in the form of volunteer work groups, most notably on the Olema Valley Trail. Please consider opening the PRNS to cyclists.

#185

Name: Ruprecht, Paul

Correspondence: Dear NPS,

I strongly support the development and analysis of alternatives that would eliminate private use of public lands within the seashore for cattle grazing and dairy operations. Please phase out these uses as they are incompatible with public purposes of the park and the tenants have already been compensated for their privilege of using public land. It is time for the park to be managed for the benefit of wildlife including tule elk and other public purposes.

Thank you.

Paul Ruprecht

#186

Name: Acord, Cary

Correspondence: As a resident of Marin County and a long time visitor and supporter of all our local public lands I would like to encourage you to please consider the following bicycle access projects.

My family, friends, and I prefer cycling as our main access to the open lands available to us for our recreation.

Thank you for your consideration!

Best, Cary Acord

A new trail between Devil's Gulch and Platform Bridge through Cheda Ranch.

Adoption of social trails off Bolinas Ridge for better connectivity and a single-track trail experience.

Extend the Olema Valley Trail to Bolinas on the east side of Highway 1.

A plan to connect the Cross Marin Trail into Point Reyes.

A more bike-friendly permit application process for road and mountain bike events in the park, including along Bolinas Ridge and out to the lighthouse.

Bike access to all ranch roads in the pastoral zone that are already open to pedestrians.

#187

Name: Hyde, Hilary

Correspondence: 1. More bike trails - Pt Reyes is sorely lacking in biking opportunities, so please add many more miles. 2. No on long leases for ranches - too dirty and not the place for cows. If the oysters were too dirty, how can you even begin to consider beef ranches?? These ranches need to be moved if not organic, and # reduced.

#188

Name: Maguire, Janis

Correspondence: I understand there is a movement to increase ranching activities and farming at Pt. Reyes National Seashore, and likely impacting the wildlife, in particular the Tule Elk. I just spent several days at Pt. Reyes because I find the solitude, wildlife, and vast openness completely magical. I came for spiritual renewal. But I could see the impact of ranching even now as quads herded cattle and dust flew, where just moments before I had seen a bobcat hunting. I have to ask: is not the reason I came - spiritual renewal - what our National Parks are all about? Please leave the elk alone. Makes no sense - you brought them back from the brink of extinction and now you want to take their land and kill them off again? Haven't we learned anything? Part of the magic of Pt. Reyes is indeed that vast coastal prairie - what's left of it. We're losing our forests - can't we please keep this small piece of what once was? Please?

#189

Name: Brooks, Dave

Correspondence: I have lived in Marin and Southern Sonoma Counties for 65 ears. I have enjoyed visiting Point Reyes National Seashore since its inception and continue to visit frequently.

I believe the creation of the park mandated the discontinuation of the ranches, farms and the oyster enterprise, Johnson's Oyster's originally I believe.

The oyster company was recently forced out in accordance with requirements, belatedly. Now the dairy and cattle farms are being considered for permanent continuation including killing off native elk!

You can't force one type of enterprise to close and leave others in place in the park, its wrong and in violation of the agreements made by the landowners of the livestock farms with the citizens of this country that pay for all of this.

Stick to the agreement and end this practice of continuance.

Dave Brooks

#190

Name: Litwin, Julie

Correspondence: To Whom It May Concern,

I have been an active volunteer at Point Reyes National Seashore for 17 years, mainly in the salmon and steelhead monitoring project. I love Pt. Reyes and, although I live in Oakland, I visit the park frequently, both to do volunteer work and to enjoy the immense natural beauty.

I understand that, until now, agriculture and ranching have been allowed in the park, but I feel very strongly that the goal should be to end these practices and allow the return of native plants and animals. Agriculture and ranching have negative impacts on native plants and animals for many reasons, including loss of habitat for wild plants and animals and the use of dangerous chemicals in the farming process and decreased water quality due to runoff. These practices do not belong in a National Park.

The fact that you are proposing to "manage" the tule elk because they compete with farm animals is an example of very bad thinking. The elk belong in Pt. Reyes. Farm animals do not. I imagine that in order to protect farm animals you might "manage" other wild predators such as bobcats, mountain lions and coyotes. Again, these are the animals that belong here and need to be encouraged, not killed or relocated to make room for farm animals.

There are places other than our beautiful National Parks that are suitable for farming and ranching. The parks are places for the public to enjoy wildness. Please prioritize wildness over agriculture in Pt. Reyes.

Thank you for your consideration.

#191

Name: Blandford, Tom

Correspondence: I'm writing concerning Point Reyes National Seashore and the Tule Elk residing there. Tule Elk were once thought to be extinct, but a California rancher single handedly saved them. Now I see that ranchers and farmers are attempting to expand their operations in such a way as to threaten the Tule Elk again. I'm a wildlife photographer with a website that has over 2,000 followers. I've visited and photographed wildlife and landscapes in over 200 National Parks, Monuments and Refuges. In my visits, I see much evidence that public lands are under direct threat by the government. The parks, refuges and monuments are woefully underfunded and many are falling into disrepair. And there is mounting pressure from ranching concerns, mining and oil and gas industries to encroach on public lands. I want more funding and MORE PROTECTION for our public lands. And I want more public lands set aside...not less. I want this for Point Reyes. Do not allow ranchers and farmers to increase their footprint and put further pressure on the Tule Elk.

#192

Name: Schuetz, Arthur

Correspondence: Expanding the scope of farming/ranching on Pt Reyes would be terrible. California has millions of acres of farm and agricultural land - the farms on Pt Reyes should be relocated, not expanded. Pt Reyes is a jewel that must be protected.

#193

Name: Kemper, Steve

Correspondence: It is now time to return Point Reyes back to the native wildlife. The NPS should not be an advocate for private beef production interests. All across this country the nation's wild and scenic areas are under continued assault by various commercial interests-these public park and historical sites are of a finite nature-once they are gone or irreversibly altered, that's just simply it!

#194

Name: N/A, A

Correspondence: I am against the proposal to shoot and/or remove any native tule elk and to instead allow new agricultural uses that will lead to killing of birds, bobcats, coyotes and foxes.

#195

Name: Stienstra, Susan

Correspondence: HR6687 should not be passed. Allow the legal processes of environmental review and planning to go forward, and do not allow private interests to run roughshod over both the processes and the incomparable beauty and richness of Point Reyes National Seashore.

Let the National Park Service conduct its comprehensive analysis, and, based on the data, (1) determine whether or not ranching can continue without harming the environment or the experience of the millions of people who visit the national seashore every year, and (2) if any of the ranches should be phased out or have their operations modified. To preempt this process in favor of private interests would be a breach of the public trust.

#196

Name: N/A, Jeff

Correspondence: I support expanding bicycle access including all of the following:

Gulch and Platform Bridge through Cheda Ranch.

Adoption of social trails off Bolinas Ridge for better connectivity and a single-track trail experience.

Extend the Olema Valley Trail to Bolinas on the east side of Highway 1.

A plan to connect the Cross Marin Trail into Point Reyes.

A more bike-friendly permit application process for road and mountain bike events in the park, including along Bolinas Ridge and out to the lighthouse.

Bike access to all ranch roads in the pastoral zone that are already open to pedestrians.

#197

Name: Carlton, Alan

Correspondence: SIERRA CLUB COMMENT ON PT. REYES NATIONAL SEASHORE GENERAL MANAGEMENT PLAN AMENDMENT PUBLIC SCOPING

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."

Each alternative should describe how it will protect and enhance all sensitive natural resources. The EIS must be based on thorough studies of the environmental effects of cattle ranching and other proposed agricultural practices on the natural environment of Pt. Reyes, including, but not limited to water quality, air quality, native vegetation, soil processes, wildlife, and endangered species.

The following should be included in the "Common Elements": All leased lands should be managed so that the range condition, where less than desirable, is improving with a goal of restoring native grasslands and habitats. Range condition should be reviewed as frequently as necessary to detect undesirable trends in time to take timely remedial actions. If grassland conditions are not improving, lease management terms should be adjusted to protect the ecological integrity of the land. No leased lands should be allowed to remain in poor condition. Residual dry matter standards should be enforced and stocking rates adjusted where they are violated. Long-term species composition favoring native species should be managed to improve their abundance and distribution in the grazed grasslands and to restore coastal prairies. 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 native habitat values of the Seashore's grasslands and coastal prairies. Livestock grazing and manure spreading should be done in a manner that builds the organic matter and topsoil and only in areas where this practice will not change the historic characteristic soil types. Regenerative grazing regimes should be used solely for their stated purpose and not for the purpose of increasing stocking densities. The Park Service must compare dairy manure composting to existing manure management practices and quantify the magnitude of environmental impacts and trade offs. Manure spreading and storage should not take place in any location where it is likely to contaminate surface waters. Manure spreading should not take place in any location frequented by Tule Elk, to reduce the risk of spreading disease. Regular, wet/dry season, water testing in all streams and ponds for nutrients and pathogens must be conducted and reported by

NPS to assure the public that aquatic and terrestrial wildlife and habitats are not at risk. Where there is pollution, adequate measures, including fencing, must be taken to eliminate it. Silage harvesting should not be allowed in the National Seashore. Current silage practices remove both native and non-native species leaving the land effectively denuded to bare earth and subject to wind and water erosion. Introduction of non-native grasses for silage would displace native plant communities thereby decreasing habitat for wildlife. A grassland management advisory board including representatives of local and national conservation groups, ranchers, and scientists should be established to regularly review the condition of the leased lands. All meetings of the advisory board must be publicly noticed and open to the public and minutes of the meetings must be required and publicly accessible.

Except in the defined core area of a ranch, for family and not for commercial purposes, no additional crops or animals other than cattle should be allowed in any alternative as they detract from the natural landscape, pose potential conflicts with wildlife, and are not necessary for continued cattle ranching and dairying.

Alternative C "Continued Ranching and Removal of the Drakes Beach Tule Elk Herd" should be eliminated. Removing Tule Elk from a significant portion of their habitats in the National Seashore is contrary to the purposes of National Parks.

Visitors to the park should have opportunities to gain understanding of what they see. There should be more informative signage at appropriate locations.

#198

Name: Giandomenica, Steve

Correspondence: Hi, I was so pleased to see the information from MCBC on consideration of more bike access in Point Reyes. As a hard core hiker and biker, I so long for inclusion for all to enjoy the amazing beauty we have here. Let's open it up and bring more people outside while we also manage for safety and harmony between different users. Thank you for the consideration.

#199

Name: N/A, N/A

Correspondence: Dear Superintendent, Point Reyes National Seashore:

As a homeowner in Inverness, and a regular hiker and photographer in the park, I urge the National Park Service to adopt a General Management Plan that prioritizes protecting the land, water and wildlife in the Point Reyes National Seashore. Commercial activities in the park should not be the basis on which wildlife is killed, sterilized or otherwise "managed". Nor should commercial ventures be operated in a way that degrades water quality or damages wildlife corridors and habitat.

I am concerned that the expansion of commercial activities to include row crops and/or other animals such as sheep, goats, chickens, etc. would eliminate important wildlife habitat and lead to more conflict between wildlife and the ranchers, thus putting beautiful wildlife like bobcats and coyotes at risk. Please protect the native wildlife and do not expand the commercial operations beyond the existing cattle and dairy ranching.

I would favor a reduced number of ranches, and for the ranches that continue to operate, creating an educational component to the properties, so that visitors can learn about the history of the dairy ranches in the area. In my years visiting the park, I have observed things that concern me - Cattle outside the leased ranching areas, cow patties along Abbott's lagoon and in and around other creeks, barbed wire clumps lying on the ground in fields, fencing that does not allow animal passage, feral cats hunting native birds and rodents, and mowing of native coyote brush.

The Tule elk are majestic creatures, and a highlight of the park for many visitors. The Drakes herd is the most easily accessible to visitors, and should be maintained. On a recent weekend, cars were pulled over on both sides

of Sir Francis Drake with visitors watching and photographing the Drakes elk herd. I oppose any killing, sterilization or removal of the elk in the park. I oppose relocating the Drakes herd. The elk in the park should be protected, not managed at an artificial "cap" to prevent conflict with commercial operations.

In closing, I urge you to put the animals and habitat first, and make decisions in the General Management Plan that focus on what is best for the creatures and landscape that make Point Reyes so magical. Thank you for soliciting comments and taking the time to read this letter.

Very truly yours, Sarah Killingsworth

#200

Name: Cerick, Rich

Correspondence: I fully support the NPS' proposals to accomplish the following in PRNS:

A new trail between Devil's Gulch and Platform Bridge through Cheda Ranch.

Adoption of social trails off Bolinas Ridge for better connectivity and a single-track trail experience.

Extend the Olema Valley Trail to Bolinas on the east side of Highway 1.

A plan to connect the Cross Marin Trail into Point Reyes.

A more bike-friendly permit application process for road and mountain bike events in the park, including along Bolinas Ridge and out to the lighthouse.

Bike access to all ranch roads in the pastoral zone that are already open to pedestrians.

PRNS is a jewel that can offer bicycle access in non-wilderness areas without adversely affecting the Park, its esthetics or its visitors. As a frequent visitor and lifetime NPS member and pass holder, I strongly support these proposals and urge the NPS to adopt them in order to improve the PRNS and its experience.

#201

Name: N/A, N/A

Correspondence: Hello, I am writing to advocate for increased mountain bike access in Pt. Reyes National Seashore. Marin County is 80% open space and mountain biking is a great way to travel throughout Marin. I prefer using a mountain bike to travel to local lakes, beaches and other similar locations. This is because there are not many safe options for road biking between east and west Marin. Traveling by bike is greener and car traffic is often pretty slow getting into west Marin, especially on weekends. I would especially like to see a dedicated east-west mountain bike route that fully connects east Marin with west Marin, out to the lighthouse in Pt. Reyes.

Thanks for considering my perspective.

#202

Name: N/A, N/A

Correspondence: As mentioned in the Background section of the Plan Amendment; Congress instructed 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" (Public Law 92-5589, 16 USC §4460bb.

It is absolutely clear that NPS has the responsibility to protect Point Reyes National Seashore to the fullest extent. The only viable options in the amendment are; No ranching and limited management of Thule Elk, or Continue current management (No action). Any other option violates the instructions of Congress since they would result

in further development and destruction of the natural area. I am fully opposed to anything that expands ranching or farming in Point Reyes National Seashore.

NPS cannot allow the destruction of such a beautiful and fragile area for the financial gain of a few ranchers who have already significantly benefitted from the generous lease/permits throughout the years. NPS cannot allow agriculture such as row crops that will bring with it fertilizers, pesticides and other chemicals that will kill fish and wildlife. Just look at what fertilizer runoff has done to decimate the Gulf of Mexico shoreline due to an explosion of Red Tide! NPS cannot allow commercial farming of other animals which will put additional pressure on the natural predators that call the park their home, such as bobcats, coyotes, hawks and owls.

There are very few places left in this country that have such a rich and diverse ecosystem. If the General Management Plan is to be amended, please amend to end ranching, otherwise continue the management with no action.

#203

Name: Beck, Barbara

Correspondence: I am in favor of allowing operational ranches in PtReyes National Seashore. Don't forget that The Seashore would never have come into being if the ranchers had not agreed to sell their land. The Ranching land was to be protected as well as turning it into a National Seashore. The Ranchers have the experience of being land stewards.....because only with proper land management will your ranch be productive. Allow longer leases for the ranchers, so they can plan into the future, allow them to complete the necessary improvements to enhance daily ranching life and production. Imagine if you had a business that would not allow you to plan for its success. Please do not destroy our agriculture heritage and all that they add to the local economy. It has been chipped away already with the closure of the oyster farm.. Did you know that oysters clean the water???? In fact New York Harbor is being restocked with oysters to help clean up that water. I'm pleading with you.....help the ranchers!
Barbara Beck

#204

Name: N/A, N/A

Correspondence: How dare you think that we need to kill more elk to allow terrible poultry and dairy farms have more space. Humans are the fucking problem. We need to stop being so greedy and stop taking advantage of everything around us. We don't need any more poultry or dairy farms. It's hard to believe that this is something even being considered. It shows how ridiculous the human race has become.

#205

Name: Vandeman, Mike

Correspondence: The NPS should give top priority to protecting our native wildlife. That requires removing bicycles and all non-native plants and animals. Mountain biking is very environmentally and medically destructive. Non-native plants like Eucalyptus, French broom, poison hemlock, annual grasses, etc. crowd out native wildlife. See https://mjvande.info/habitat_restoration.htm.

Bicycles should not be allowed in any natural area. They are inanimate objects and have no rights. There is also no right to mountain bike. That was settled in federal court in 1996: <https://mjvande.info/mtb10.htm> . It's dishonest of mountain bikers to say that they don't have access to trails closed to bikes. They have EXACTLY the same access as everyone else - - ON FOOT! Why isn't that good enough for mountain bikers? They are all capable of walking....

A favorite myth of mountain bikers is that mountain biking is no more harmful to wildlife, people, and the environment than hiking, and that science supports that view. Of course, it's not true. To settle the matter once and for all, I read all of the research they cited, and wrote a review of the research on mountain biking impacts (see

<https://mjvande.info/scb7.htm>). I found that of the seven studies they cited, (1) all were written by mountain bikers, and (2) in every case, the authors misinterpreted their own data, in order to come to the conclusion that they favored. They also studiously avoided mentioning another scientific study (Wisdom et al) which did not favor mountain biking, and came to the opposite conclusions.

Mountain bikers also love to build new trails - legally or illegally. Of course, trail-building destroys wildlife habitat - not just in the trail bed, but in a wide swath to both sides of the trail! E.g. grizzlies can hear a human from one mile away, and smell us from 5 miles away. Thus, a 10-mile trail represents 100 square miles of destroyed or degraded habitat, that animals are inhibited from using. Mountain biking, trail building, and trail maintenance all increase the number of people in the park, thereby preventing the animals' full use of their habitat. See <https://mjvande.info/scb9.htm> for details.

Mountain biking accelerates erosion, creates V-shaped ruts, kills small animals and plants on and next to the trail, drives wildlife and other trail users out of the area, and, worst of all, teaches kids that the rough treatment of nature is okay (it's NOT!). What's good about THAT?

To see exactly what harm mountain biking does to the land, watch this 5-minute video:
<http://vimeo.com/48784297>.

In addition to all of this, it is extremely dangerous: https://mjvande.info/mtb_dangerous.htm .

For more information: <https://mjvande.info/mtbfaq.htm> .

The common thread among those who want more recreation in our parks is total ignorance about and disinterest in the wildlife whose homes these parks are. Yes, if humans are the only beings that matter, it is simply a conflict among humans (but even then, allowing bikes on trails harms the MAJORITY of park users - - hikers and equestrians - - who can no longer safely and peacefully enjoy their parks).

The parks aren't gymnasiums or racetracks or even human playgrounds. They are WILDLIFE HABITAT, which is precisely why they are attractive to humans. Activities such as mountain biking, that destroy habitat, violate the charter of the parks.

Even kayaking and rafting, which give humans access to the entirety of a water body, prevent the wildlife that live there from making full use of their habitat, and should not be allowed. Of course those who think that only humans matter won't understand what I am talking about - - an indication of the sad state of our culture and educational system.

#206

Name: Vandeman, Mike

Correspondence: The NPS should give top priority to protecting our native wildlife. That requires removing bicycles and all non-native plants and animals. Mountain biking is very environmentally and medically destructive. Non-native plants like Eucalyptus, French broom, poison hemlock, annual grasses, etc. crowd out native wildlife. See https://mjvande.info/habitat_restoration.htm.

Bicycles should not be allowed in any natural area. They are inanimate objects and have no rights. There is also no right to mountain bike. That was settled in federal court in 1996: <https://mjvande.info/mtb10.htm> . It's dishonest of mountain bikers to say that they don't have access to trails closed to bikes. They have EXACTLY the same access as everyone else - - ON FOOT! Why isn't that good enough for mountain bikers? They are all capable of walking...

A favorite myth of mountain bikers is that mountain biking is no more harmful to wildlife, people, and the environment than hiking, and that science supports that view. Of course, it's not true. To settle the matter once

and for all, I read all of the research they cited, and wrote a review of the research on mountain biking impacts (see <https://mjvande.info/scb7.htm>). I found that of the seven studies they cited, (1) all were written by mountain bikers, and (2) in every case, the authors misinterpreted their own data, in order to come to the conclusion that they favored. They also studiously avoided mentioning another scientific study (Wisdom et al) which did not favor mountain biking, and came to the opposite conclusions.

Mountain bikers also love to build new trails - legally or illegally. Of course, trail-building destroys wildlife habitat - not just in the trail bed, but in a wide swath to both sides of the trail! E.g. grizzlies can hear a human from one mile away, and smell us from 5 miles away. Thus, a 10-mile trail represents 100 square miles of destroyed or degraded habitat, that animals are inhibited from using. Mountain biking, trail building, and trail maintenance all increase the number of people in the park, thereby preventing the animals' full use of their habitat. See <https://mjvande.info/scb9.htm> for details.

Mountain biking accelerates erosion, creates V-shaped ruts, kills small animals and plants on and next to the trail, drives wildlife and other trail users out of the area, and, worst of all, teaches kids that the rough treatment of nature is okay (it's NOT!). What's good about THAT?

To see exactly what harm mountain biking does to the land, watch this 5-minute video:
<http://vimeo.com/48784297>.

In addition to all of this, it is extremely dangerous: https://mjvande.info/mtb_dangerous.htm .

For more information: <https://mjvande.info/mtbfaq.htm> .

The common thread among those who want more recreation in our parks is total ignorance about and disinterest in the wildlife whose homes these parks are. Yes, if humans are the only beings that matter, it is simply a conflict among humans (but even then, allowing bikes on trails harms the MAJORITY of park users - - hikers and equestrians - - who can no longer safely and peacefully enjoy their parks).

The parks aren't gymnasiums or racetracks or even human playgrounds. They are WILDLIFE HABITAT, which is precisely why they are attractive to humans. Activities such as mountain biking, that destroy habitat, violate the charter of the parks.

Even kayaking and rafting, which give humans access to the entirety of a water body, prevent the wildlife that live there from making full use of their habitat, and should not be allowed. Of course those who think that only humans matter won't understand what I am talking about - - an indication of the sad state of our culture and educational system.

#207

Name: Vandeman, Mike

Correspondence: The NPS should give top priority to protecting our native wildlife. That requires removing bicycles and all non-native plants and animals. Mountain biking is very environmentally and medically destructive. Non-native plants like Eucalyptus, French broom, poison hemlock, annual grasses, etc. crowd out native wildlife. See https://mjvande.info/habitat_restoration.htm.

Bicycles should not be allowed in any natural area. They are inanimate objects and have no rights. There is also no right to mountain bike. That was settled in federal court in 1996: <https://mjvande.info/mtb10.htm> . It's dishonest of mountain bikers to say that they don't have access to trails closed to bikes. They have EXACTLY the same access as everyone else - - ON FOOT! Why isn't that good enough for mountain bikers? They are all capable of walking....

A favorite myth of mountain bikers is that mountain biking is no more harmful to wildlife, people, and the environment than hiking, and that science supports that view. Of course, it's not true. To settle the matter once and for all, I read all of the research they cited, and wrote a review of the research on mountain biking impacts (see <https://mjvande.info/scb7.htm>). I found that of the seven studies they cited, (1) all were written by mountain bikers, and (2) in every case, the authors misinterpreted their own data, in order to come to the conclusion that they favored. They also studiously avoided mentioning another scientific study (Wisdom et al) which did not favor mountain biking, and came to the opposite conclusions.

Mountain bikers also love to build new trails - legally or illegally. Of course, trail-building destroys wildlife habitat - not just in the trail bed, but in a wide swath to both sides of the trail! E.g. grizzlies can hear a human from one mile away, and smell us from 5 miles away. Thus, a 10-mile trail represents 100 square miles of destroyed or degraded habitat, that animals are inhibited from using. Mountain biking, trail building, and trail maintenance all increase the number of people in the park, thereby preventing the animals' full use of their habitat. See <https://mjvande.info/scb9.htm> for details.

Mountain biking accelerates erosion, creates V-shaped ruts, kills small animals and plants on and next to the trail, drives wildlife and other trail users out of the area, and, worst of all, teaches kids that the rough treatment of nature is okay (it's NOT!). What's good about THAT?

To see exactly what harm mountain biking does to the land, watch this 5-minute video:
<http://vimeo.com/48784297>.

In addition to all of this, it is extremely dangerous: https://mjvande.info/mtb_dangerous.htm .

For more information: <https://mjvande.info/mtbfaq.htm> .

The common thread among those who want more recreation in our parks is total ignorance about and disinterest in the wildlife whose homes these parks are. Yes, if humans are the only beings that matter, it is simply a conflict among humans (but even then, allowing bikes on trails harms the MAJORITY of park users - - hikers and equestrians - - who can no longer safely and peacefully enjoy their parks).

The parks aren't gymnasiums or racetracks or even human playgrounds. They are WILDLIFE HABITAT, which is precisely why they are attractive to humans. Activities such as mountain biking, that destroy habitat, violate the charter of the parks.

Even kayaking and rafting, which give humans access to the entirety of a water body, prevent the wildlife that live there from making full use of their habitat, and should not be allowed. Of course those who think that only humans matter won't understand what I am talking about - - an indication of the sad state of our culture and educational system.

#208

Name: Sampson, Sonie

Correspondence: Our National Parks were created for the protection of their natural wonders to benefit the enjoyment of present and future generations. Part of that oversight is to protect native vegetation and wildlife that creates a healthy ecosystem.

Point Reyes National Seashore belongs to all of us and should be managed for the greater public good and not a few commercial ranching interests.

Removing or even killing Tule elk because they eat grass and may compete with commercial ranching seems criminal. The cattle and dairy operations continue to pollute Drake's Estero marine waters and degrade essential wildlife habitat for threatened and endangered species.

These ranching operations on park lands also make little economic sense as the dairy market in the area is flooded and prices have dropped for private ranchers.

Please act to phase out commercial ranching operations at Pt. Reyes National Seashore.

Thank you.

#209

Name: Starkgraf, Valerie

Correspondence: Look, the idea of killing or relocating wildlife from Point Reyes is beyond bonkers. Commercial ranching is creating a great deal of negative impacts such as habitat destruction, erosion, and pollution from animal waste. The continuation of commercial ranching of any kind in this area represents a grossly inappropriate mismanagement of this land. The fact that ranching would be phased out is not a new idea. It's time. It's time to value this land and slow its ecosystem to heal properly. It's time to turn the land back over to the native species and work to remove the non-native. Removing the ranches would be the huge and necessary first step.

#210

Name: SkoneRees, Erica

Correspondence: Please do not kill animals in their natural habitat. There are so many ways in which the natural world is being killed off only for humans to later discover how detrimental it is to our own survival. Let nature be! I am a home owner, a voter, an independent business owner and I use our national parks. Please let nature be- we need to keep areas natural & sacred.

#211

Name: Gabrielle, Estellise

Correspondence: To say nothing about the plan to start removing or even killing Tule elk because they eat grass and may compete with commercial ranching, or the fact that the cattle and dairy operations continue to pollute Drake's Estero and degrade essential wildlife habitat for threatened and endangered species, these ranching operations also make little economic sense.

#212

Name: N/A, N/A

Correspondence: I am a Point Reyes National Seashore visitor. I oppose the current proposal to remove tule elk from the park. I am opposed to allowing the ranches expand operations especially into raising chickens. I am opposed to extending the leases of any of the ranches. The lands should be turned over to the NPS for public use when the original holders of the lease or their spouses are deceased. Congress never expressed the intent that dairies and ranches continue operating indefinitely, which would be inconsistent with the Park Service's mission and the Act that created the Point Reyes. The cows are truly a blight on the park. The dairy pastures are in a terrible state with no native plants and an abundance of weeds. The cattle and dairy operations continue to pollute Drake's Estero and degrade essential wildlife habitat for threatened and endangered species. I hate driving/biking past the cows on the way to the lighthouse. The proposal put forth undermines the long-held principle that our National Parks shall be managed for the protection of their natural wonders for the benefit and enjoyment of present and future generations.

In my opinion the long term goal for these dairy pastures should be full restoration of the coastal prairie habitat that is almost all gone in California. The Tule Elk should be allowed to roam the park free from ranching fences and agricultural activities. Ranching should be phased out. In the future these pastures should be open to the public for recreation.

#213

Name: N/A, N/A

Correspondence: Hello, I am a supporter of both family run ranching and of National Parks, however, I do not think that we should continue to allow ranching in Pt Reyes National Seashore. In light of changing environmental conditions (higher temperatures, more fires, etc) and consumers habits (many people choosing not to eat beef or drink milk), ranching in Pt Reyes is likely not sustainable anyway, without subsidies. Nor is it fair to the small farmers in the area who are not on Park Land. Degradation of the land is occurring at an alarming rate, and we need to address this issue. The Park needs to do an assessment of the impacts of ranching on the land and to have the ability to do what's right for the park. I would advocate for Option F- It is time for ranching to be phased out on our National Park Land.

#214

Name: Djordjevich, Kathleen

Correspondence: Please phase out commercial farming (dairy) at Pt. Reyes National Seashore, so few wild places exist today, this one which is so valuable for our area must be protected.

#215

Name: Lawrence, Ann

Correspondence: Dear National Park Service People,

I wish to voice my objection to the proposal to renew dairy farm leases for 20 years at Pt. Reyes. I am also opposed to killing Tule Elk. Dairy farmers were promised conditional tenure in the past, with no renewals guaranteed beyond what the current lease promises. To hand them a 20 year lease is appalling. The Pt. Reyes National Seashore is for all people. Cows produce methane gas which is counter to clean air at this park. The cows also despoil creeks and land. Commercial businesses are inappropriate for this land. Also appalling: proposed consideration to slaughter Tule Elk after bringing them here. There are other, much more humane, solutions, if it is deemed necessary for the population to be reduced.

Please reconsider this proposal.

Thank you for your consideration.

Sincerely,

Ann Lawrence

#216

Name: Wuerthner, George

Correspondence: I am writing to express my opposition to any further ranching/farming on MY national seashore. The livestock interests that are trying to maintain their grip on OUR property must be removed. When Congress authorized buying the ranchers' lands in 1978, it made clear that ranchers could only reserve "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."

We, the public, paid all these livestock interests for their property years ago and generously gave them a twenty year period to leave- -a period of time well past.

Furthermore, the presence of livestock poses a threat to native wildlife including Tule elk. Domestic livestock carry many diseases that can be transmitted to wild cervids (like brucellosis, CWD, etc. so pose a threat to OUR wildlife.

In addition, there is on-going water pollution from dairy and livestock operations of our waterways.

It's not like there is no other land in CA for production of dairy and/or beef. But there are few places where we can protect and preserve coastal landscapes with native wildlife like Tule Elk.

I find it a joke to suggest these operations should be protected for their "cultural and historic" value. As if there is no other livestock operations occurring nearby or in California. It's like saying we should preserve some coal-fired power plants operating for their "historic and cultural" value.

Finally, the presence of livestock requires infrastructure like fences etc. that hinders the free movement of wildlife as well as humans on OUR LANDS.

#217

Name: Marderosian, Ara

Correspondence: For many reasons, including but not limited to climate change, Sequoia ForestKeeper is in support of Alternative F - No Ranching in Pt. Reyes National Seashore.

#218

Name: Marderosian, Ara

Correspondence: For many reasons, including but not limited to climate change, Sequoia ForestKeeper is in support of Alternative F - No Ranching in Pt. Reyes National Seashore.

#219

Name: Carey, dan

Correspondence: i want to go on record that i favor PHASING OUT dairy operations at Pt Reyes Seashore. sooner rather than later. last time i was there, i found it grotesque to drive through the middle of a farm operation, sprawled across the road to get to the Point. mud and cowpies on the road. nice. but bigger picture, since when are cows part of an historical (before 1800 or so) natural landscape? Cows OUT...Elk IN. Dan Carey

#220

Name: Reynolds , Thomas

Correspondence: Hello I love Point Reyes, it is however a shame that the dairy industry seems to have more impact and power than the wildlife. I go to the park 3 or 4 times a month to photograph wildlife. I hope that the Elk, Bobcat , Coyote, and Badger etc. will have the same respect as the domestic animals like cows Thank you Tom Reynolds Also the roads are a mess

#221

Name: N/A, N/A

Correspondence: I lived in Northern California for 25 yrs, before moving to Montana 2 yrs ago. I enjoyed numerous trips to Point Reyes, including walking to the light house, over the years. I also enjoyed seeing the Thule Elk. I am well aware of the fact that area would be heavily developed, with a resort on every bluff, if the dairy farmers and the Government hadn't come up with the plan for the Nt Seashore.

I support the continuation of having the dairy cattle on the land, as long as the dairies remain in the original family.....that was the agreement. Perhaps, over time, the government can buy the farm land for permanent protection.

The land should never be sold, or developed. Yes the cows are hard on the land, but, as I said, the land would be so over developed by now, had that amazing agreement not been brought to fruition. The dairy cattle should remain as long as the dairy continues operation. I think sensitive areas, like the edges of the bluffs and the drainage's should be protected from erosion by the cows.

The excess Thule Elk should be given to tribes, and perhaps some can be hunted.

#222

Name: Senne, Gregg

Correspondence: I'm all for opening up Pt. Reyes to more cycling opportunities. My only reservations toward off-road cycling are possible erosion problems that lead to habitat disruption. I would like to see some forethought in keeping damage to a minimum so that off-road cycling can be a permanent attraction to Pt. Reyes.

BTW, it was at the lighthouse where I saw a California Grey Whale for the first time. Cool.

#223

Name: N/A, N/A

Correspondence: November 19, 2018

Superintendent Cicely Muldoon Point Reyes National Seashore 1 Bear Valley Road Point Reyes Station, CA 94956

RE: 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

Dear Superintendent Muldoon, Thank you for the opportunity to submit comments concerning the proposed General Management Plan Amendment. I am concerned about protection of resources, restoration, and public access. I have addressed my concerns below for your review and consideration.

1) Protection of Natural Resources I. Long-term leases should be determined through a transparent process and ensure ranching practices are compatible with the Seashore's mission to protect natural and cultural resources and are complementary to visitor experiences within the park.

II. 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 strategy to balance and accommodate the presence of elk and cattle.

III. The proposed conservation framework and programmatic best management practices should be based on the best available science and have defined goals and outcomes for the lease areas that demonstrate ranching and dairy compatibility with the Seashore's mission.

IV. Operational flexibility should allow for environmental improvements for ranches and dairies by simplifying operational processes; however, it must be limited to flexibility in current activities and maintenance and be integrated within the conservation framework.

V. I am not supportive of diversification, which I define as new land uses outside of cattle ranching and dairying that impact park resources or visitor experience. If NPS is considering authorizing diversification within the planning area, it should be limited to the ranch core, and there must be a separate transparent public process and specific NEPA evaluation for any new proposed uses to identify environmental conflicts and appropriate

mitigation to ensure consistency with the purpose for which the Seashore was established. 2) RESTORATION OF DEGRADED HABITATS AND WATER QUALITY I. NPS should consider habitat restoration flexibly within the conservation framework in order to improve efficiency, funding, and third-party partnerships to identify and complete restoration projects within a year.

II. NPS needs to prioritize and increase resources for additional water quality sampling in all creeks and estuaries within the planning area boundaries to better inform management strategies and water quality goals. 3) PUBLIC ACCESS I. Ensure maximum allowable public access within the planning area, while respecting the needs for privacy within the defined ranch cores. EAC would like to see improved visitor interpretation areas and better-defined trails within the planning area so that the public is aware of where it is appropriate and safe to hike within the Seashore without damaging park resources or interfering with ranch operations.

II. With increases of visitation to the Seashore, protection of resources needs to be prioritized with improved public education and volunteer services to support those goals.

Thank you for the opportunity to submit comments concerning the proposed General Management Plan amendment.

Sincerely,

Sandy Zelasko

#224

Name: R, Brian

Correspondence: I fully support the following points:

-A new trail between Devil's Gulch and Platform Bridge through Cheda, McIsaac and Zanardi Ranch.

-A plan to connect the Cross Marin Trail into Point Reyes.

-Adoption of social trails off Bolinas Ridge for better connectivity and a single-track trail experience.

-Extend the Olema Valley Trail to Bolinas on the east side of Highway 1. -Close gaps for bikes through ranch lands in the park, including closing the Estero Trail loop, connecting Sir Francis Drake Blvd. with Pierce Point Road and connecting Marshall Beach to Pierce Point Road,

-A more bike-friendly permit application process for road and mountain bike events in the park, including along Bolinas Ridge and out to the lighthouse.

-Bike access to all ranch roads in the pastoral zone that are already open to pedestrians.

#225

Name: Dreskin, Wendy

Correspondence: I support keeping the tule elk with no culling in any area. I have led trips to see the tule elk for guests from all over the world through Point Reyes Field Institute, Dinner on the Pacific Plate, and the Point Reyes Birding and Nature Festival. No one is excited to see cows. Everyone from locals to overseas guests are excited to see the elk. The elk were here before the ranchers, and their well-being should take precedence. I do not agree that buildings from the mid-1800s are "historic." That is the skewed perspective in California. In Europe and other countries that is hardly considered old, let alone historic. Any ranch buildings that are not re-purposed for education should be torn down and the land returned to its natural state. The exception I would make would be Pierce Point Ranch which I hope could eventually be a living history exhibit like the house at Wilder Ranch

state Park. Ranches do not enhance the visitor experience at Point Reyes National Seashore. Look at the trail to Abbott's Lagoon - endangered California Harebells and Point Reyes Checkerbloom on one side of the fence, and nothing on the other side (except in the small area fenced for Sonoma Foxtail). Ranchers should not be able to decide where there are Z gates so land can be accessed by hikers. This should be up to the park service. There should be a Z gate so it is possible to hike around Abbott's Lagoon. I was told a rancher vetoed this, putting his interests ahead of public interests. The PRNS should have jurisdiction over anything that degrades the park and negatively affects wildlife, whether it is use of pesticides or herbicides, outdoor cats that prey on birds, feeding methods that increase the number of predatory ravens and crows which again affects birds, large trucks that tear up the roads, or anything else. I am personally in favor of phasing out the ranches.

#226

Name: Carlson, Daniel

Correspondence: I am commenting on the lack of trails for mountain biking in Marin and in support of opening up more trails for riders.

In particular, I support the following proposals: ~ A new trail between Devil's Gulch and Platform Bridge through Cheda, McIsaac and Zanardi Ranch. ~ A plan to connect the Cross Marin Trail into Point Reyes. ~Adoption of social trails off Bolinas Ridge for better connectivity and a single-track trail experience. ~Extend the Olema Valley Trail to Bolinas on the east side of Highway 1. ~Close gaps for bikes through ranch lands in the park, including closing the Estero Trail loop, connecting Sir Francis Drake Blvd. with Pierce Point Road and connecting Marshall Beach to Pierce Point Road, ~A more bike-friendly permit application process for road and mountain bike events in the park, including along Bolinas Ridge and out to the lighthouse. ~Bike access to all ranch roads in the pastoral zone that are already open to pedestrians.

I believe that biking is a great way to enjoy the outdoors and riders are being penalized unfairly, in favor of hikers and horseback riders. It makes little sense to me that there can't be a solution to make the great outdoors available to all responsible users.

Thank you for considering opening up more trails for riders.

#227

Name: Robertson , Stacie

Correspondence: Maintain protection of this natural landscape and habitat.

#228

Name: Carbonell, David

Correspondence: The Point Reyes National Seashore is a desert when it comes to mountain bike access. This is a tragedy given how much terrain is available to other user groups, and how scientific evidence has shown that mountain bikers do not pose any threat to other users or to the environment.

Projects that could improve trail access include a new trail between Devil's Gulch and Platform Bridge through Cheda, McIsaac and Zanardi Ranch.

Connectivity could be improved with a plan to connect the Cross Marin Trail into Point Reyes.

In addition, adoption of social trails off Bolinas Ridge would increase connectivity and a single-track trail experience. These trails would provide additional opportunities for cyclists who are already using the ridge trail.

Please consider extending the Olema Valley Trail to Bolinas on the east side of Highway 1.

Close gaps for bikes through ranch lands in the park, including closing the Estero Trail loop, connecting Sir Francis Drake Blvd. with Pierce Point Road and connecting Marshall Beach to Pierce Point Road,

A more bike-friendly permit application process for road and mountain bike events in the park, including along Bolinas Ridge and out to the lighthouse, is sorely needed.

And as always, please allow bike access to all ranch roads in the pastoral zone that are already open to pedestrians.

#229

Name: Smith, gerald

Correspondence: Dear Sirs,

I do not object to continuing to allow dairy cattle operations at Point Reyes, but I am opposed to allowing any alternative agriculture or commercial operations within the park. I also strongly feel that the Tule Elk should be given a higher priority than cattle and they should be allowed to remain in the park. In fact, I would like to see the size of the elk herd increased and the size or the grazing area devoted to the elk expanded. Finally, I believe that greater public access should be provided in the cattle ranching areas via hiking and mountain biking trails. There are many parks and open spaces which allow hikers and bikers access to cattle grazing areas so I do not see why that should present any problem at Pt Reyes.

It is my understanding that the mission of the National Parks is to serve the public first, not the commercial interests of a few individuals. It seems to me that if Pt Reyes is going to be operated as private ranches which are off limits to the public then I see no reason to maintain it as a park. Instead, the National Park System should just sell the property to ranchers and be done with it.

Thank you for allowing me to submit comments.

Jerry Smith

#230

Name: Bishop, Norman

Correspondence: As a retired national park ranger of 36 years, I had ample time to get acquainted with the purpose of national parks, and their management objectives. None of those is dairying. I have visited Point Reyes, and recognize its value as a natural area, which is being severely degraded for native fauna.

At establishment, when Congress authorized buying the ranchers' lands in 1978, it made clear that ranchers could only reserve "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." Congress never expressed the intent that dairies and ranches could continue operating indefinitely, which would be inconsistent with the Park Service's mission and the Act that created Point Reyes National Seashore.

Even if it is desirable to preserve the historical aspects of ranching at Point Reyes, it should be based on historical terms rather than the modern industrial operations the ranches have become. Current operations hardly resemble the 19th century ranches that earned cultural and historical designations. Rather, these operations have become a modern unsightly industrial blight, blocking the public's access and use, degrading lands and waters, and limiting your management options.

The Act that created the National Seashore envisioned that these lands-public lands-would eventually be restored and become part of America's natural legacy; a unique coastal ecosystem found only at Point Reyes.

To carry out that intent, I strongly suggest that you select Alternative F - No Ranching. It is unconscionable to me that you plan to start removing or even killing the native Tule elk because they eat grass and may compete with commercial ranching, or the fact that the cattle and dairy operations continue to pollute Drake's Estero and degrade essential wildlife habitat for threatened and endangered species, these ranching operations also make little economic sense.

#231

Name: Gregorian, Yvon

Correspondence: We live in the birthplace of mountain biking and represent half of the people you'll see on Mount Tam and the surrounding Open space. There are more Mountain Bikers than there are runners, hikers, horseback riders or any other individual group and we are the fastest growing group yet we only have access to 10% of the trails. There has been some progress over the last several decades but it has been glacially slow and the time has come for a more progressive and inclusive trail management plan. I am weary of meeting hikers on trails that feel they have a right to verbally or physically harass me regardless of how respectful or civilly I behave towards them. If you go just about anywhere in this state or elsewhere in the country you will find the exact opposite approach being taken and those communities are reaping the benefits with increased tourism and residents living healthier lifestyles. Towns like Moab, Bend, Bozeman, Sedona, and Crested Butte just to name a few. Yet here where the sport was invented we are treated like outlaws. That is why I fully support these upcoming proposals to add connectors in strategic locations that will enhance and expand rideable areas in Marin. Thank you for your consideration, let's end the separation and bring everyone together to enjoy, maintain and cherish this incredible natural resource as one community. Yvon Gregorian

#232

Name: Long, Richard

Correspondence: I support increased bike trails in and around Point Reyes national park. The following projects are of particular interest. I would actively use these trails responsibly with family and friends.

A new trail between Devil's Gulch and Platform Bridge through Cheda, McIsaac and Zanardi Ranch.

A plan to connect the Cross Marin Trail into Point Reyes.

Adoption of social trails off Bolinas Ridge for better connectivity and a single-track trail experience.

Extend the Olema Valley Trail to Bolinas on the east side of Highway 1.

Close gaps for bikes through ranch lands in the park, including closing the Estero Trail loop, connecting Sir Francis Drake Blvd. with Pierce Point Road and connecting Marshall Beach to Pierce Point Road,

A more bike-friendly permit application process for road and mountain bike events in the park, including along Bolinas Ridge and out to the lighthouse.

Bike access to all ranch roads in the pastoral zone that are already open to pedestrians.

Thank you, Rich Long

#233

Name: Williams, Priscilla

Correspondence: The current proposals are misguided. I ask that commercial ranching operations in our Point Reyes National Seashore be phased out.

The Act that created the National Seashore envisioned that these lands-our lands-would eventually be restored and become part of America's natural legacy; a unique coastal ecosystem found only at Point Reyes.

Even if there is a desire to preserve the historical aspects of ranching at Point Reyes, it should be based on historical terms rather than the modern industrial operations the ranches have become.

#234

Name: BrittonSmith, Denice

Correspondence: Do not further restrict use of lands by cattle and cattle producers. They are important to our economy and food chain.

#235

Name: N/A, N/A

Correspondence: I SUPPORT THE CONTINUED OPERATION OF EXISTING DAIRY FARMS WEST OF THE SAN ANDREAS FAULT AT PORE. THE DAIRY FARMS SHOULD BE LIMITED TO THEIR CURRENT SIZE AND NOT BE EXPANDED. PORE SHOULDN'T CHARGE MORE THAN WHAT THE DAIRIES CAN AFFORD SO THAT THEY CAN BE PROFITABLE. DAIRIES SHOULDN'T BE ALLOWED TO HAVE ANY TOURIST RELATED BUSINESSES. DAIRY LEASES SHOULD BE NON TRANSFERABLE EXCEPT FOR IMMEDIATE FAMILY HEIRS WHO WANT TO CONTINUE THE BUSINESS. IF NO IMMEDIATE FAMILY HEIRS WANT TO CONTINUE THE BUSINESS THEN THE DAIRY OR BEEF CATTLE RANCH SHOULD REVERT TO NATURAL LANDS.

THERE SHOULD BE NO EXPANSION OF EXISTING LANDS TO DAIRY/BEEF CATTLE GRAZING. EXISTING DAIRIES SHOULD NOT BE PERMITTED TO SWITCH TO BEEF CATTLE GRAZING OPERATIONS.

#236

Name: Leather, Rose

Correspondence: Phase out industries in Point Reyes National Seashore as was the official plan initially in 1978. Industrial farming has no place in our nationally treasured lands. It pollutes and is an eyesore. Nor is it necessary to local employment and revenue. Point Reyes pays for itself in its pristine nature by attracting visitors to the area.

#237

Name: Millbrooke, Anne

Correspondence: Dairy cows and beef cattle, and ranching in general, are part of our culture, past and present. But neither needs to be at Point Reyes, where domesticated livestock represent invasive species that harm natural biodiversity. Given the vast amount of land in this country in use by grazing livestock and their forage, and the comparatively little set aside for nature, biodiversity, and our mental health, I favor removing all livestock from Point Reyes.

#238

Name: Miles, Walter

Correspondence: I oppose Congressman Huffman's revisionist legislation, asserting "Congress' long-standing intent that working dairies and ranches continue to be authorized to operate." Huffman's legislation shamefully misleads the public. When Congress authorized buying the ranchers' lands in 1978, it made clear that ranchers could only reserve "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. Congress never expressed the intent that dairies and ranches continue operating indefinitely, which would be inconsistent with the Park Service's mission and the Act that created the Point Reyes.

Even if we want preserve the historical aspects of ranching at Point Reyes, it should be based on historical terms rather than the modern industrial operations the ranches have become. Current operations hardly resemble the 19th century ranches that earned cultural and historical designations. Rather, these operations have become a modern nightmare, blocking the public's access and use, polluting lands and waters, and limiting our management options.

The Act that created the National Seashore envisioned that these lands-our lands-would eventually be restored and become part of America's natural legacy.

In view of the ecosystem, I ask that commercial ranching operations in our Point Reyes National Seashore be phased out

#239

Name: Ribe, Tom

Correspondence: I am commenting on the continuation of commercial livestock operations at Point Reyes National Seashore, managed by the National Park Service.

I have visited this park many times and have been struck by the presence of cattle and cattle management equipment in a large area of the park that his heavily visited by the public.

As I understand the cattle ranchers are using land owned by the people of the United States. In 1978 the ranchers were given a 25 year term for their operations. That term has expired and the NPS has an obligation to decide if ranching is consistent with the Organic Act of the National Park Service and with the purposes of the National Seashore. The NPS is not an organization to support agriculture or to subsidize agriculture.

Pt. Reyes is close to a major metropolitan area with millions of people who use the park for relief from the urban setting. It is an international attraction and is thus important to the local economy for the dollars visitors spend locally. The primary purpose of Pt. Reyes is to serve current and future generations of Americans and to protect the natural environment over the long term. I strongly contend that cattle ranching is contrary to the mission of the National Seashore and is contrary to the mission of the National Park Service.

I know many people are sentimental about ranching and dairies but these operations are very common outside the park and can continue elsewhere without use of National Park land. Further, the ranching operations pollute the surface and ground water, they destroy native vegetation and spread exotics and I understand a proposal exists to start killing native elk on behalf of the ranchers. Elk should not be killed for any purpose outside protecting the natural environment.

I strongly urge the NPS to terminate the ranching operations and have the cattle removed from the park as soon as possible. I know this will cause controversy just as the oyster farming termination did. But it is the right thing to do for the large number of visitors to the park and for the native wildlife and plants that depend on an wild environment rather than one contaminated by cattle.

Thank you for your consideration.

#240

Name: Ross, Craig

Correspondence: I am excited to hear about the possible increase in access for bikes! Pt. Reyes National Seashore is one of Marin's greatest natural assets, but for far too long access in the National Park has been severely limited to people like myself who enjoy riding as opposed to other forms of outdoor activity. Knee problems severely limit the amount of time I can spend running, jogging or hiking. I do not have access to a horse. So the only real option for me is to ride a bike. Gaining more access to more trails at Pt. Reyes would be an amazing opportunity for people like me to enjoy the benefits this beautiful park has to offer. Please strongly consider increasing bike access during your upcoming meeting.

#241

Name: Stompe, Susan

Correspondence: Maintain ranching + dairy with better management of the Drake elk herd Analyze the carrying capacity of elk in their original herd locations Drake + Tomales Point.

Analyze impact of the Park agriculture on the total Marin ag. production and the ability of the non-park agriculture to be viable without the Park contribution critical mass.

#242

Name: Post, Tom

Correspondence: I am in favor of Alternative A (no action)

It seems to be working and I am completely against allowing ranches to diversify their operations

into raising chickens etc. The fact that you are considering shooting elk if they get over certain numbers is ludicrous. you are compromising cattle over elk. I agree that the buildings are historic but cattle are not and this is not a zoo.

What if ranches are allowed to raise chickens. Coyotes + bobcats will find them and are you going to shoot them over chickens.

This is a natural seashore and to increase ranching operations is a bad idea.

#243

Name: Oppenheim, Diana

Correspondence: I gather that the main concern over the Tule Elk come from cattle ranchers.

1. NPS should NOT protect an industry goal over wildlife protection
2. in NO plan that includes limiting ranching + protecting the Elk did I see any solution to appease cattle ranchers. - -> is there another way to assist the ranchers if we prioritize biodiversity, wilderness protection + save the Tule Elk from unnecessary "management" whether it's lethal or not?
3. in NO plan that includes limiting ranching operations did I see any type of restoration work to INCREASE biodiversity + wilderness. - -> Is there a way to use this as an opportunity to not just save the Tule Elk, but to restore habitat to a healthier, more resilient place? This will make all the "compassionate for the animals" options more alluring + more effective at combating climate change + its effects.

#244

Name: Fricke, John

Correspondence: As a frequent day hiker in Pt. Reyes National Seashore, I support Alternatives E or F, i.e., cease dairy ranching operations in a national park. If ranching is allowed to continue, at the very least it should be eliminated in the areas west of Highway 1 (and perhaps allowed on the ranches #19-30).

The first paragraph of the 12-page newsletter regarding the General Management Plan Amendment quotes from the enabling legislation: Point Reyes National Seashore (Point Reyes) was created on September 13, 1962, 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" (Public Law 87-657, 16 USC §459c). Dairy ranching is inconsistent with the quoted language.

#245

Name: Massa, Julie

Correspondence: Dear Superintendent, On behalf of In Defense of Animals, I submit to you 4,716 signatures from concerned members who have spoken out in favor of protecting the Tule Elk and allowing them to live and thrive on their natural range along the Point Reyes National Seashore. The National Park Service proposes to allow the Point Reyes National Seashore to cull and manage Tule elk, a species that can only be found in California's unique ecosystems. Please stop the senseless killing of Tule Elk herds for the short-sighted plans of ranchers who wish to maintain and expand their animal agriculture businesses. Tule elk must be protected in their natural habitat for the species to survive. Thank you for your careful consideration of this important matter.

#246

Name: Ferguson, Doug and Jane

Correspondence: Good people: We are writing to express our strong support for the pending federal legislation introduced jointly by Reps. Jared Huffman and Rob Bishop (here the "Legislation") respecting the management of agricultural lands in the Point Reyes National Seashore (here the "Seashore"). We have both been closely involved since 1969 in land use issues affecting the Point Reyes National Seashore - - Doug as a cofounder of the Trust for Public Land and Jane as an Audubon Canyon Ranch Docent and early ACR Board member. The Legislation will result in needed protection of the myriad negotiations and resulting legal compromises that some years ago permitted the creation of the Golden Gate National Recreational Area, as faithfully recorded in the documentary film *Rebels with a Cause*. Those compromises were designed to protect and continue viable farming and ranching operations which most definitely should not now be restricted by persons wishing to undo the laudable goals and accomplishments of the original legislation. The countless citizens who jointly crafted those legislative solutions are in all fairness now entitled to see them carefully and promptly implemented.

#247

Name: Boggs, Denise

Correspondence: On behalf of Conservation Congress (conservation nonprofit incorporated in CA), and its members I am submitting the following comments. Conservation Congress supports Alternative F - No Ranching in Pt. Reyes National Seashore. The following points should be seriously considered prior to making a final decision.

Private ranches were bought out more than four decades ago, at fair market value and enormous taxpayer expense, to create the National Seashore. In 1978, Congress passed a law that livestock leases on these Park Service lands could be extended "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 his or her spouse." Beyond that point, Congress allowed, but did not require, the Park Service to issue ranch leases if ranching does not impair the natural resources and wildlife at the Seashore.

Heavy grazing by beef and dairy cattle is destroying the native coastal prairie, replacing native grasses with noxious weeds.

Livestock contaminate streams and rivers with manure, resulting in some of the worst Clean Water Act violations in California for fecal bacteria, in streams that empty out onto popular public beaches.

Tule elk are rare and imperiled, and the “elk preserve population is fenced into a narrow peninsula that lacks adequate water during drought, confinement that killed hundreds of elk between 2012 and 2014. The fence must come down, and elk, not livestock, should be allowed to thrive throughout Point Reyes National Seashore. Cultivation of “silage crops” on Point Reyes to feed cattle in Concentrated Animal Feeding Operations (CAFOs) destroys native habitats, and when silage is mown in Spring, kills ground-nesting birds and native rodents. This subsidizes unnaturally large raven populations, which in turn prey on the nests of the endangered snowy plover in their beachside nesting habitats.

Dairy and beef cattle are infected with Johne's disease, a chronic wasting intestinal disease, which spreads to native elk and may be a public health and safety hazard as well.

Cattle cause increased erosion and siltation in local trout and salmon spawning streams, threatening the survival of imperiled runs of coho salmon and steelhead. The high density of livestock, barbed-wire fences, and malodorous manure-spreading on the hilltops at Point Reyes is incompatible with the National Seashores legal charge to provide “public benefit, recreation and inspiration.” The interests of 335 million Americans, and 7 million Bay Area residents, should take precedence over the interests of 13 ranching families who have overstayed their lease terms.

#248

Name: Dimberg, Daniel

Correspondence: Greetings- Wildlife populations are in trouble all over the world. Dairy cattle are NOT in trouble. The thought of killing Tule Elk on a national park area to make room for more dairy cattle and other farm animals is impossible to understand. Move them, start new herds, there must be birth control methods for wild hoofed animals..... Something!.... just don't kill 'em!!!

#249

Name: N/A, N/A

Correspondence: LET IT BE Must every inch of land Be wounded, Trampled and destroyed Must every view be looked upon By human eye? Can we not set apart A sheltered place To treasure as it is And be content in knowing It is there Untouched, unseen? Our wilderness? Not ours - Let it be.

Marjorie McKenzie Davis Founder of Wildlife Fawn Rescue

#250

Name: Aldrich, William

Correspondence: Hello, I'm a parent of 2 middle school kids in San Francisco. We treasure our visits to Pt Reyes, and it would improve our experience dramatically if there were more bike-oriented trail experiences on offer in the park, particularly single-track dirt trails. Today so much of the park's experience is confined to cars. We love hiking/walking, too, but the ability to explore more of the park's extraordinary landscape by bicycle would be a game-changer. In addition to extending the range of my kids' and my exploration, it would also permit us to connect more easily with surrounding amenities such as the restaurants in Inverness without having to use our car. Thank you for your stewardship of these lands, and for the thoughtful process of improving access to them which you are leading the public through.

-Will Aldrich, San Francisco

#251

Name: Cohen, Gordon and Christine

Correspondence: Having lived in Marin and Sonoma for about 45 years, my husband Gordon and I are big fans of Pt. Reyes. We applauded its inception in 1962 before Rep. Jared Huffman was even born. We were thrilled to walk through Pt. Reyes and find the Tule Elk peacefully grazing and resting on the hillsides. The Tule Elk barely survived total extinction and finally found a safe haven in Pt. Reyes. We greatly value the Natural World including the iconic Tule Elk of Pt. Reyes. The Tule Elk are to Pt. Reyes much like the Moose are to the Grand Tetons, the Bison are to Yellowstone and the Grizzly Bear are to Glacier. These are some of the last big mammals of North America. The Elk draw people from all over the world to visit Pt. Reyes.

Tue ranchers have about 6000 cattle grazing in Pt. Reyes, while relatively small bands of Tule Elk are competing for the forage that the cattle need to qualify as organic. Rep. Jared Huffman has come to the rescue of the ranchers by way of H.R. 6687. During the Trump presidency, which is the most anti-environmental administration imaginable, Rep. Huffman has joined forces with Utah's Rep. Rob Bishop, Chairman of the Natural Resources Committee, to craft a bill that bypasses the National Park Service scoping and public input and guarantees the ranchers 20 year leases to Pt. Reyes. Rob Bishop is tied to the axing of over a million acres of land that was preserved by President Obama in the Bears Ears National Monument. Such policies as these represent the values of exploitation of the Natural World and open up the way to mining, drilling, ranching and hunting in our National Parks. John Muir's values of preservation, respect and reverence for our magnificent lands, forests, oceans and water ways are reduced to being called natural resources for entrepreneurs that now want to invade the last bastions of the Natural World in our National Parks.

By circumventing the normal Democratic process by way of H.R. 6687, ranchers in all probability will be able to continue ranching and even calling the shots in regard to the destiny of the Tule Elk. Based on a recent Chronicle newspaper article, chicken ranching may also be added to the land use. What is most infuriating is that Rep. Huffman has taken sides with the ranchers, has surreptitiously bypassed the Democratic process and has disregarded the wishes of those of us who value Pt. Reyes just for itself.

Of further concern is what cattle do to the land. These animals impact the environment and leave a heavy toll of manure, while mowing through native grasses and coastal prairie, destroying native habitat, and eroding and polluting streams and waterways with manure. Compound that with barbed wire fencing, that prevents wildlife from traveling freely from one area to another, and you have a stew of toxic elements added to our National Park. If Huffman's H.R. 6687 goes through, we hope there will be an effort to reduce the impact of ranchers and the cattle with a place made for the Tule Elk to live, the Salmon to swim in clean water, and the Plovers to safely nest in the Spring.

We as Nature Lovers want to be heard too. We do not want the Tule Elk hunted down and killed or culled or lethally annihilated to suit one group of people. Surely there must be a better way to resolve these conflicts. After all, the ranchers have the great privilege to enjoy one of the most beautiful and mild places in the World, all paid for decades ago by taxpayers. We'd like to see more fairness and compassion for our Natural World.

#252

Name: N/A, N/A

Correspondence: I feel that the leases for these private businesses should not be renewed. They are being extended for detriment of the park "resources" wildlife and elk.

No where on your GMP amendment does it say you will protect, preserve, + propagate the native species of animals + plants in the park.

Your plan, and Huffmans bill is another step backward for the people of the US and our public lands.

If the owners of these lands cannot coexist with the nature of the park, they should go

No elk hunt or "relocation" or "tribal" sacrifices of our elk.

#253

Name: N/A, N/A

Correspondence: I feel that the leases for these private businesses should not be renewed. They are being extended for detriment of the park "resources" wildlife and elk.

No where on your GMP amendment does it say you will protect, preserve, + propagate the native species of animals + plants in the park.

Your plan, and C ituffmans bill is another step backward for the people of the US and our public lands.

If the owners of these lands cannot coexist with the nature of the park, they should go

No elk hunt or "relocation" or "tribal" sacrifices of our elk.

#254

Name: OFarrell, Eileen

Correspondence: Please consider supporting Ken Salazar's promise (2014) that ranches and dairies located in Point Reyes National Seashore be granted 20 year leases, not for lesser amounts of time, and certainly not eliminated.

Ranchers and dairymen need assurance that their investments of time and money to plan for continued use of this land will not be for naught. They need to know their future so they can plan changes such as more rotational grazing (fencing and water supply) and efficient stocking levels. They are the true stewards of this land and should be respected as such.

It is essential to have input from those familiar with livestock management, not just from environmental radicals with little knowledge or sympathy for the value of, in this case, cattle. Cattle keep down fire fuel and weeds and keep the pastures beautiful for the public's enjoyment. The ranches and dairies are very much traditional uses for this land, and their long history in the area should be preserved.

Thank you.

#255

Name: Savino, Robert

Correspondence: Very disappoint that you may consider extending the use of land for cattle use at the expense of the native wild life. If there can't be a way to have both exist then the ranchers don't have to use our public lands.

#256

Name: Cimeno, Rich

Correspondence: Thanks for opportunity weigh in on Point Reyes General Management Plan Scoping.

I love The Point Reyes- the idea 60 years ago of letting ranch proceed was wrong- it is wrong today.

The ranching community is fighting to exist on public because of reduce cost of the overhead.

They have slowly been increasing their foot print of public/National Park lands without oversight. Their herd stays in total to be over 6000 cows. They have caused excessive landuse issues not seen in any other National land except Grand Tetons in Wyoming.

I support Park alternative E.

The reduction of ranching and management and the restoration of the park landscape. The extension of leases w/o protection of wildlife and habitats as Rep. J. Hoffman Bill H.K. 6681 is wrong.

Currently the ranches are held to no land stewardship standards- that has to change. As ranching and that milk production is no longer profitable- they need to move on. Those lease must not be extended to other newer ranchers- maybe more aggressive and with tougher congressional allies who will override - our WEAK land use standards- !

My point ranches abandoned lease must go direct back into non-ranching uses to be used for habitat and wildlife.

The elk are not the problem. Oversize dairy and beef herds allowed to grow unchecked is the problem - has there ever been a EIR review as herd size grow to GOOD COWS. -NO-

The NPS General Management Plan must increase herd reduction - using NEPA pressure This is a National Park - not a Corporate Farm!

HR 6687 is the start of the prevention of ranching and other industries in our national park. HR 6687 offers no land management. Fake news!

The idea of California Indian tribes "might" be interested in taking elk off the hands of the ranchers hold no water the only way a tribe might get interest is if the N.P.S. offers them lots of money.

#257

Name: Foster, Brian

Correspondence: A new trail between Devil's Gulch and Platform Bridge through Cheda, McIsaac and Zanardi Ranch.

A plan to connect the Cross Marin Trail into Point Reyes.

Adoption of social trails off Bolinas Ridge for better connectivity and a single-track trail experience.

Extend the Olema Valley Trail to Bolinas on the east side of Highway 1.

Close gaps for bikes through ranch lands in the park, including closing the Estero Trail loop, connecting Sir Francis Drake Blvd. with Pierce Point Road and connecting Marshall Beach to Pierce Point Road,

A more bike-friendly permit application process for road and mountain bike events in the park, including along Bolinas Ridge and out to the lighthouse.

Bike access to all ranch roads in the pastoral zone that are already open to pedestrians.

#258

Name: Barbee, Dan

Correspondence: I think it is great you are considering opening trails to bikes in the Pt. Reyes area. It is a large area of land with many existing trails that, unfortunately to this date, have only been accessible to foot traffic(a large user group) and equestrians(a very small user group), while bicycles(another large and ever-growing group) have been consistently discriminated against in any attempt for improved access.

If the NPS wishes to address access for ALL user groups then I can only encourage you to look beyond the exclusionary tactics used by organizations like the Foot People, and tired arguments about who causes more damage to our trails, deserves access, not to mention over-inflated claims of safety.

All of these issues can be effectively addressed as they are in many places in our state, country and abroad, so that all user groups can work together to create a quality outdoor experience for everyone and not just for the few who claim to know what is best based mostly on a continual and incessant policy of contempt and division.

We are all people who enjoy where we live and the outdoor opportunities we have so readily available. If your goal is to include everyone then you should work toward that objective. Look beyond the segregated perspective of the few and create an inclusive environment all of us can take pride in.

Thank you and good luck!!

#259

Name: Filiatrault, Daniel

Correspondence: I am a nature lover who enjoys experiencing the outdoors on my mountain bike. I like that it is easier on the joints and can allow me to travel longer distances under human power. I am in favor of creating/opening trails that allow bicycles greater access to nature.

#260

Name: Jones, Rick

Correspondence: I fully support the following proposed projects...

A new trail between Devil's Gulch and Platform Bridge through Cheda, McIsaac and Zanardi Ranch.

A plan to connect the Cross Marin Trail into Point Reyes.

Adoption of social trails off Bolinas Ridge for better connectivity and a single-track trail experience.

Extend the Olema Valley Trail to Bolinas on the east side of Highway 1.

Close gaps for bikes through ranch lands in the park, including closing the Estero Trail loop, connecting Sir Francis Drake Blvd. with Pierce Point Road and connecting Marshall Beach to Pierce Point Road,

A more bike-friendly permit application process for road and mountain bike events in the park, including along Bolinas Ridge and out to the lighthouse.

Bike access to all ranch roads in the pastoral zone that are already open to pedestrians.

#261

Name: Stanton, Timothy

Correspondence: 20 November 2018

Superintendent Cicely Muldoon Point Reyes National Seashore 1 Bear Valley Road Point Reyes Station, CA 94956

RE: Notice of Intent to Prepare an Environmental Impact Statement for a General Management Plan Amendment (GMPA), Point Reyes National Seashore and North District of Golden Gate National Recreation Area

Dear Superintendent Muldoon, Thank you for the opportunity to submit comments concerning the proposed General Management Plan Amendment. I am a long-term resident of West Marin living adjacent to the Seashore. For decades I have observed and roamed throughout the park as a hiker and concerned neighbor. I am highly appreciative of the care and concern with which NPS staff have worked to advance their mission protecting this invaluable natural resource while making it available to the public. I have read over and about the GMPA and am generally supportive of the selected Alternative B. However, I am concerned about protection of resources, restoration, and visitor access included in the proposed plan. I briefly discuss my concerns below for your review and consideration.

1) Protect natural resources: I. I believe and hope that long-term leases will be determined through a transparent process and ensure that ranching practices are compatible with the Seashore's mission to protect natural and cultural resources and enable satisfying visitor experiences within the Park.

II. I urge NPS to protect and manage the Park's natural resources, including the tule elk, as a high priority, as mandated by the Seashore's mission and management policies. We should strive to reduce conflicts between protection of natural resources and ranching. I hope if culling of the elk herd is deemed necessary, that non-lethal strategies will be identified and used. We need to balance and accommodate the presence of both elk and cattle.

III. The proposed conservation framework and management practices should be based on the best available science and have defined goals and outcomes for the lease areas demonstrating ranching and dairy compatibility with the Seashore's mission.

IV. We should provide flexibility to the ranchers for environmental and operational improvements: however, any changes should maintain current, allowed activities, be integrated with ongoing conservation efforts, and prohibit any unauthorized expansion.

V. I do not support agricultural diversification outside of cattle ranching and dairying that impacts natural resources or visitor experience. If NPS does consider diversification, it should be limited to the ranch core with separate, transparent public authorization processes and specific NEPA evaluations for any proposed uses to identify environmental conflicts and appropriate mitigation strategies to ensure consistency with the purpose for which the Seashore was established. 2) Restore degraded habitat: I. NPS should consider habitat restoration flexibly within the conservation framework in order to improve efficiency, funding, and third-party partnerships to identify and complete restoration projects.

II. NPS needs to prioritize and increase resources for additional water quality sampling in all creeks and estuaries within the planning area boundaries to better inform management strategies and water quality goals related to cattle ranching and dairying. 3) Visitor access: I. Ensure maximum allowable visitor access within the planning area, while respecting needs for privacy within the defined ranch cores. It would be wonderful if there could be improved visitor interpretation areas and better-defined trails within the planning area, so that visitors are aware of where it is appropriate and safe to hike without interfering with ranch operations.

II. Public visitation to the Seashore has greatly expanded in recent years, which makes protection of resources with improved public education and staff and volunteer resources increasingly important. I hope this too can be addressed in this plan.

Thank you for the opportunity to submit these comments.

Kind regards, Tim Stanton

#262

Name: Sume, Hasan

Correspondence: I would like to see the following:

A new trail between Devil's Gulch and Platform Bridge through Cheda, McIsaac and Zanardi Ranch.

A plan to connect the Cross Marin Trail into Point Reyes.

Adoption of social trails off Bolinas Ridge for better connectivity and a single-track trail experience.

Extend the Olema Valley Trail to Bolinas on the east side of Highway 1.

Close gaps for bikes through ranch lands in the park, including closing the Estero Trail loop, connecting Sir Francis Drake Blvd. with Pierce Point Road and connecting Marshall Beach to Pierce Point Road,

A more bike-friendly permit application process for road and mountain bike events in the park, including along Bolinas Ridge and out to the lighthouse.

Bike access to all ranch roads in the pastoral zone that are already open to pedestrians.

#263

Name: Wedge, Brian

Correspondence: Hello NPS!

Thanks for considering my thoughts as you move forward with your planning.

I wanted to ask for your support of the following:

1. PLEASE connect the Cross Marin Trail into Point Reyes. Just this year alone two cyclists have been hit and killed on Sir Francis Drake and the Cross Marin Trail keeps us safe as well allowing us to enjoy the natural beauty of Marin.
- 2.) The Olema Valley should connect to Bolinas on the east side of highway 1 if at all possible.
- 3.) We would like to see bike access to all ranch roads that are already open to pedestrians.
- 4.) Please consider adopting the existing social trails off of Bolinas Ridge for better connections to existing infrastructure.
- 5.) Close gaps for bikes through ranch lands in the park, including closing the Estero Trail loop, connecting Sir Francis Drake Blvd. with Pierce Point Road and connecting Marshall Beach to Pierce Point Road

Thank you! Brian

#264

Name: Racich, Rick

Correspondence: Thank you for this opportunity to have a voice in future biking access in Marin. I have been an avid bicyclist for the past 35 years, enjoying both road and mountain biking in Marin. Marin is popular for biking because it has so much to offer its bicycle enthusiast with incredible hills, vistas, scenery, etc. I love road bike riding, but over the years I have moved to more mountain biking due to the safety concerns of riding on our busy roads. I also enjoy hiking and understand the concerns of those people on foot who do not like bikers on the trails. I am hopeful that there will be some compromise and reasonable people that figure out some smart ways for the many user groups to enjoy the trails and roads together. With some common sense and some common courtesy I think there is room for all user groups to enjoy the wonderful outdoor places in Marin and the GGNRA. Whatever can be done to help promote better biking access and safety for biking I am an advocate. Any access to fire roads, ranch roads, trails, etc would be great, especially if they provide an alternative to using the busy roads to get from A to B. I'm a MCBC supporter and therefore support their visions as well. I am also an advocate of Class 1 ebikes that allows the aging bicyclist to keep biking into their senior years. FYI - Class 1 ebikes do not have a throttle, they are peddle assist only.

Thanks for your consideration,

Rick Racich, Firefighter Marin County Fire Dept

#265

Name: Harbin, Kimberly

Correspondence: I am writing to respectfully request that commercial ranching operations be phased out at the Point Reyes National Seashore, and that Tule Elk be allowed to roam their natural habitat, not just a small spit of land. Point Reyes is a national treasure and should be used in a manner that will benefit most Americans, not just a small special group.

#266

Name: Hale, Candace

Correspondence: Thank you for the opportunity to comment. I love Point Reyes deeply; it is a spiritual haven and a soul restorer. I am torn by the current planning process - - I am deeply committed to wildlife and nature, but/and I also like to support family farms, especially organic ones. I am also concerned about proper housing for farmworkers. The things I know are simply not acceptable in a public wildlife refuge like Point Reyes are the use of rodenticides and/or pesticides, and the "culling" of elk to "protect" ranchers' interests. No, No NO!!!! It is not okay to kill wildlife to support private agricultural interests, no matter how much I enjoy eating locally raised food. There are other places people can farm; there are no other places for the wildlife to go. We almost lost Tule Elk once; I can't believe you are considering practices that would diminish their population. I am also opposed to the expansion of farming/ ranching that would impinge on wildlife. We already have birds being killed on their nests due to farming practices at Point Reyes - - how can this be okay in a place set aside as a wildlife preserve???? I am concerned about water quality effects from ranching/farming. I understand you have a difficult job before you, and that my comments would be easier to sort if I just said "NO AGRICULTURE" or "farming first." But I don't believe either of those positions is correct. However, as you prioritize, please put nature first. That was the intent of the the National Seashore in the first place. I personally would like to see the farms continue. But not at the expense of the animals or the land. Thank you.

#267

Name: Roth , Jeremy

Correspondence: Superintendent Cicely Muldoon Point Reyes National Seashore 1 Bear Valley Road Point Reyes Station, CA 94956 RE: 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 Dear Superintendent Muldoon, Thank you for the opportunity to submit comments concerning the proposed General Management Plan Amendment. I am concerned about protection of resources, restoration, and public access. I have addressed my concerns below for your review and consideration.

1) Protection of Natural Resources I. Long-term leases should be determined through a transparent process and ensure ranching practices are compatible with the Seashore's mission to protect natural and cultural resources and are complementary to visitor experiences within the park. II. 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 strategy to balance and accommodate the presence of elk and cattle. III. The proposed conservation framework and programmatic best management practices should be based on the best available science and have defined goals and outcomes for the lease areas that demonstrate ranching and dairy compatibility with the Seashore's mission. IIII. Operational flexibility should allow for environmental improvements for ranches and dairies by simplifying operational processes; however, it must be limited to flexibility in current activities and maintenance and be integrated within the conservation framework. V. I am not supportive of diversification, which I define as new land uses outside of cattle ranching and dairying that impact park resources or visitor experience. If NPS is considering authorizing diversification within the planning area, it should be limited to the ranch core, and there must be a separate transparent public process and specific NEPA evaluation for any new proposed uses to identify environmental conflicts and appropriate mitigation to ensure consistency with the purpose for which the Seashore was established. 2) RESTORATION OF DEGRADED HABITATS AND WATER QUALITY I. NPS should consider habitat restoration flexibly within the conservation framework in order to improve efficiency, funding, and third-party partnerships to identify and complete restoration projects within a year. II. NPS needs to prioritize and increase resources for additional water quality sampling in all creeks and estuaries within the planning area boundaries to better inform management strategies and water quality goals. 3) PUBLIC ACCESS I. Ensure maximum allowable public access within the planning area, while respecting the needs for privacy within the defined ranch cores. EAC would like to see improved visitor interpretation areas and better-defined trails within the planning area so that the public is aware of where it is appropriate and safe to hike within the Seashore without damaging park resources or interfering with ranch operations. II. With increases of visitation to the Seashore, protection of resources needs to be prioritized with improved public education and volunteer services to support those goals. Thank you for the opportunity to submit comments concerning the proposed General Management Plan amendment. Sincerely,

Jeremy Roth Full Name

#268

Name: WETZIG, RICHARD

Correspondence: I am a 74 year old retired person who enjoys hiking and nature. The Point Reyes Park provides me with a unique location to pursue these interests. The park is relatively close to my home which is critical to my situation. PLEASE, PLEASE do not take this away from me. PLEASE DO NOT CHANGE THE CURRENT STATUS OF THE PARK!

Thank you, Richard Wetzig

#269

Name: Guy, Otis

Correspondence: Thanks so much for considering and having public comment on more trail access and connector opportunities for bicycles at Pt Reyes national park.

Access for bicycles to different parts of the park will enhance and bring the park experience to many more people. I was a Boy scout and was there when the park was dedicated By Lady Bird Johnson and very happy to see more inclusion for all types of users.

Thanks, Otis

#270

Name: Mouser, William

Correspondence: If there's to many elk and deer please allow a drawing for hunting to thin herds. Hunters are an integral part of all conservation. There would be no conservation without hunters. We where the original conservationists in this county and most others as well.

#271

Name: Kritzer, Sherry

Correspondence: I want to voice my opposition to the plan to "manage the herd (of tule elk) by removals or killings." And this being proposed to allow cattle to trample and degrade the beautiful landscape, so that we humans can then slaughter and eat the cattle. Please allow a more natural approach: elk grazing and roaming. We humans are causing so much damage to the environment; how can we declare that elk aren't allowed on this land? Controlling the elk herd by sterilization would be much more humane.

Thank you for considering these comments.

Sherry Kritzer

#272

Name: Muldoon, Matthew

Correspondence: Hi folks. Please consider the merits of the current proposals put forth by the Marin County Bicycle Coalition to improve bicycle access to PRNS. As things stand now, cycling options in the National Seashore lands are very limited. The MCBC proposals are reasonable and modest, and will significantly improve the cycling experience in the National Seashore lands.

Thank you for your stewardship of the treasure that is the Point Reyes National Seashore!

Matt Muldoon

#273

Name: Hidaka, Miki

Correspondence: As an avid hiker, road and trail cyclist, I enjoy and value the privilege of accessing Pt Reyes Nat'l Seashore Lands and believe greater and safer enjoyment by the masses can be achieved by the following:

1. A new trail between Devil's Gulch and Platform Bridge through the Cheda, McIsaac, and Zanardi Ranches.
2. Extension of the Cross Marin Trail into Point Reyes.

3. Adoption of social trails off Bolinas Ridge for better connectivity and a single-track trail experience.
4. Extension of the Olema Valley Trail to Bolinas on the east side of Highway 1.
5. Closure of gaps for bikes through ranch lands in the park, including closing the Estero Trail loop, connecting Sir Francis Drake Blvd. with Pierce Point Road, and connecting Marshall Beach to Pierce Point Road,
6. A more bike-friendly permit application process for road and mountain bike events in the park, including along Bolinas Ridge and out to the lighthouse.
7. Bike access to all ranch roads in the pastoral zone that are already open to pedestrians.

Thank you for your kind consideration.

#274

Name: Reed, Dave

Correspondence: Hi there, although I'm not a permanent resident of Pt Reyes, I do spend every summer there and appreciate every amount of mountain bike access I can get. So I'd like to formally voice my support of the efforts to increase the biker access to the area. Living in Colorado the rest of the year, I have become aware of the great benefits that a cycling friendly community can impart on small towns, and I truly believe that any and all access that you can provide for mountain bikers will payoff greatly.

All of these would be wonderful:: A new trail between Devil's Gulch and Platform Bridge through the Cheda, McIsaac, and Zanardi Ranches.

A plan to connect the Cross Marin Trail into Point Reyes.

Adoption of social trails off Bolinas Ridge for better connectivity and a single-track trail experience.

Extend the Olema Valley Trail to Bolinas on the east side of Highway 1.

Close gaps for bikes through ranch lands in the park, including closing the Estero Trail loop, connecting Sir Francis Drake Blvd. with Pierce Point Road, and connecting Marshall Beach to Pierce Point Road,

A more bike-friendly permit application process for road and mountain bike events in the park, including along Bolinas Ridge and out to the lighthouse.

Thanks for hearing me out, and I'm hoping these all come to fruition.

#275

Name: N/A, N/A

Correspondence: This sounds like a wonderful proposal. I would even agree to paying a use fee to help in maintaining the trails

#276

Name: Steiner, Moritz

Correspondence: I'd like to express my support for the trail projects championed by the MCBC. I love hiking on Point Reyes, but cycling is unfortunately not enough developed so far.

A new trail between Devil's Gulch and Platform Bridge through the Cheda, McIsaac, and Zanardi Ranches.

A plan to connect the Cross Marin Trail into Point Reyes.

Adoption of social trails off Bolinas Ridge for better connectivity and a single-track trail experience.

Extend the Olema Valley Trail to Bolinas on the east side of Highway 1.

Close gaps for bikes through ranch lands in the park, including closing the Estero Trail loop, connecting Sir Francis Drake Blvd. with Pierce Point Road, and connecting Marshall Beach to Pierce Point Road,

A more bike-friendly permit application process for road and mountain bike events in the park, including along Bolinas Ridge and out to the lighthouse.

Bike access to all ranch roads in the pastoral zone that are already open to pedestrians.

#277

Name: fitzpatrick, matthew

Correspondence: Hello - I want to enthusiastically give my support for several of this project's initiatives -

A new trail between Devil's Gulch and Platform Bridge through the Cheda, McIsaac, and Zanardi Ranches.

A plan to connect the Cross Marin Trail into Point Reyes.

Adoption of social trails off Bolinas Ridge for better connectivity and a single-track trail experience.

Extend the Olema Valley Trail to Bolinas on the east side of Highway 1.

Close gaps for bikes through ranch lands in the park, including closing the Estero Trail loop, connecting Sir Francis Drake Blvd. with Pierce Point Road, and connecting Marshall Beach to Pierce Point Road,

A more bike-friendly permit application process for road and mountain bike events in the park, including along Bolinas Ridge and out to the lighthouse.

Bike access to all ranch roads in the pastoral zone that are already open to pedestrians.

#278

Name: Arnold, Megan

Correspondence: As a Sonoma County resident, cyclist and hiker who enjoys the outdoors and such splendid local places as Point Reyes, I would like to voice my support for the following projects:

- A new trail between Devil's Gulch and Platform Bridge through the Cheda, McIsaac, and Zanardi Ranches.

- A plan to connect the Cross Marin Trail into Point Reyes.

- Adoption of social trails off Bolinas Ridge for better connectivity and a single-track trail experience.
- Extend the Olema Valley Trail to Bolinas on the east side of Highway 1.
- Close gaps for bikes through ranch lands in the park, including closing the Estero Trail loop, connecting Sir Francis Drake Blvd. with Pierce Point Road, and connecting Marshall Beach to Pierce Point Road,
- A more bike-friendly permit application process for road and mountain bike events in the park, including along Bolinas Ridge and out to the lighthouse.
- Bike access to all ranch roads in the pastoral zone that are already open to pedestrians.

Thank you, Megan Arnold

#279

Name: Nigro, Lawrence

Correspondence: Point Reyes National Seashore is an American treasure. I believe strongly that public policy on ranching should have preservation as its cornerstone. Preservation to me includes all native species in the park. I just spent five days straight hiking throughout the park. For the first time I saw a northern pygmy owl hunting songbirds during the day. The meadowlarks gathered on the top of coyote bushes talking away and keeping an eye out for the owl.

One of the reasons I hiked throughout those five days was because the parkland along the coast had the healthiest air in Marin. Point Reyes filters the air and the heart.

I am torn about the role of ranching in Marin. We need places that respect and embrace our past. This past includes both the ranching past and the natural past. I strongly feel there should be no expansion of commercial activities on the ranches. In the last five days my wife and I counted three bobcats in the park. Two of them were on ranch land. What would happen if chicken rearing would be allowed? Chickens and bobcats do not mix.

I believe the historic family members of the ranchers should be allowed to continue their work. I do not believe the deed should be transferred to another family or business. When a family by choice and/or time is no longer able to ranch the land should go back to the national park and the fences should come down.,

The national park service and the federal government needs to preserve our natural history. I have taught in Marin for thirty years and many times have taken classes to the park. The young children in my class learn that the world is so much more than a jittery screen.

There are many places in Marin and Sonoma to farm. There is only one place where on the same day you can see whales, spotted skunks, burrowing owls, elephant seals, coyote and bobcat.

Please support only a strict historical use of ranch land.

#280

Name: Waldron, John

Correspondence: I am an avid bay area cyclist and would appreciate more trail access in the beautiful Pt. Reyes National Seashore and surrounding areas. I have hiked through much of the area and love the beauty of it all and deeply appreciate that everybody is still able to access this land and saving it from development while doing so. What would make it even better would it being more accessible via bike. On that note I'm all in favor for: -A new trail between Devil's Gulch and Platform Bridge through the Cheda, McIsaac, and Zanardi Ranches -A plan to

connect the Cross Marin Trail into Point Reyes -Adoption of social trails off Bolinas Ridge for better connectivity and a single-track trail experience -Extend the Olema Valley Trail to Bolinas on the east side of Highway 1 -Close gaps for bikes through ranch lands in the park, including closing the Estero Trail loop, connecting Sir Francis Drake Blvd. with Pierce Point Road, and connecting Marshall Beach to Pierce Point Road, -A more bike-friendly permit application process for road and mountain bike events in the park, including along Bolinas Ridge and out to the lighthouse -Bike access to all ranch roads in the pastoral zone that are already open to pedestrians

#281

Name: Baker, Thomas

Correspondence: People are feeling strongly that our natural resources EVERYWHERE must be protected that we are in dire conditions of climate change, loss of species, irreparable harm to ALL THINGS NATURAL.

#282

Name: Burger, Karin

Correspondence: I would like to wholeheartedly endorse the projects proposed by the Marin County Bicycle Coalition, as follows. Thank you for the opportunity to comment:

A new trail between Devil's Gulch and Platform Bridge through the Cheda, McIsaac, and Zanardi Ranches.

A plan to connect the Cross Marin Trail into Point Reyes.

Adoption of social trails off Bolinas Ridge for better connectivity and a single-track trail experience.

Extend the Olema Valley Trail to Bolinas on the east side of Highway 1.

Close gaps for bikes through ranch lands in the park, including closing the Estero Trail loop, connecting Sir Francis Drake Blvd. with Pierce Point Road, and connecting Marshall Beach to Pierce Point Road,

A more bike-friendly permit application process for road and mountain bike events in the park, including along Bolinas Ridge and out to the lighthouse.

Bike access to all ranch roads in the pastoral zone that are already open to pedestrians.

#283

Name: Porrata, Carlos

Correspondence: To Whom it May Concern; I have viewed the scoping documents through the eyes of a local resident (41 years living in the Point Reyes Peninsula), a retired California State Park Ranger, environmentalist, wildlife photographer, and devoted community member.

While having spent a career protecting and interpreting our natural and cultural resources of this peninsula, I watched my daughters grow up and go to school with the sons and daughters of our neighboring ranching families here. I believe that these ranching families should be able to continue ranching in this area and I am open to alternative B. Interior Secretary Salazar requested the 20 year leases to reassure ranchers in the Pastoral Zone that the issue of the Drakes Estero Wilderness was separate from ranching. I agree. So do many of the environmental organizations I am a member of. I do believe that the public and the ranchers can continue to coexist, both NPS management and ranchers closely working together. Ranchers being more understanding of the fact that ranching in a National Park entails more of a relationship with the public and the park wildlife, and the park proactively working with the ranchers as part of the cultural environment within the NPS.

Park visitors and we wildlife photographers love the Tule Elk with a passion and there is no way many of us would accept the elimination of the Elk herd at Drakes Bay. Alternative B provides a reasonable alternative to managing the Elk issue. After all, it offers ranchers mitigation for damages or losses and other methods to make them whole and work with them on solutions. The wildlife is a primary concern for NPS, but it should not be seen as one or the other, either cows or Elk.

I was also very happy to read the elements common to all action alternatives, especially bullet points that encourage improving public access and trail opportunities. Accessibility has been at times difficult in some of the ranches. NPS should build more people friendly access next to the gates instead of allowing visitors to open and close the gates themselves. or jump over them to gain access to range land. This would avoid a gate left open by mistake putting animals in danger.

On another subject that is not related to any of the alternatives but is central to my community concerns that is rarely brought up or talked about:

Ranch worker housing belongs to the lease holders at the Point Reyes National Seashore and it is maintained by the owners, often based on their individual standards and degree of responsibility towards their workers. With longer leases possibly offered of up to 20 years, it is reasonable to expect for the lease holders throughout the Pastoral Zone to abide by consistent, clearly stipulated lease conditions that addresses this issue.

The new leases should include a section on Ranch worker housing that directly addresses ranch/dairy worker housing standards and clearly delineated federal, County, and lease holder responsibilities for the conditions and maintenance of that housing since they are located in federal Public land subject to a lease.

Thanks for the opportunity to comment on this important GMP Amendment and EIS.

#284

Name: Koss, Brian

Correspondence: Below is a list of things I would like to see accomplished.

A new trail between Devil's Gulch and Platform Bridge through the Cheda, McIsaac, and Zanardi Ranches.

A plan to connect the Cross Marin Trail into Point Reyes.

Adoption of social trails off Bolinas Ridge for better connectivity and a single-track trail experience.

Extend the Olema Valley Trail to Bolinas on the east side of Highway 1.

Close gaps for bikes through ranch lands in the park, including closing the Estero Trail loop, connecting Sir Francis Drake Blvd. with Pierce Point Road, and connecting Marshall Beach to Pierce Point Road,

A more bike-friendly permit application process for road and mountain bike events in the park, including along Bolinas Ridge and out to the lighthouse.

Bike access to all ranch roads in the pastoral zone that are already open to pedestrians.

Thank You, Brian Koss

#285

Name: N/A, N/A

Correspondence: Dear,

I would like to voice my support for the 7 projects outlined by the MCBC for improved bicycle access to our public lands in Point Reyes National Seashore. If implemented it would not only provide more recreation opportunities but also a safer way (more trails means less road sharing with motorists) for cyclists to enjoy the wonders of a place very special to many outdoor enthusiasts.

Sincerely

#286

Name: Cortis, Edward

Correspondence: Folks,

Ride a lot in Marin - it's awesome - would love to be able to ride more of Pt. Reyes National Seashore

I think connecting the Cross Marin Trail into Point Reyes would be super cool.

Extend the Olema Valley Trail to Bolinas on the east side of Highway 1 - decent trail to ride - prefer to be off the road from Bolinas... rather than riding on 1 to the current start of the trail

And related - it would be great to connect the Glen Camp site to the end of the Bear Valley trail... makes for a decent gravel loop.

Finally bike access to all ranch roads in the pastoral zone that are already open to pedestrians.

Thanks Ed

#287

Name: Nawbary, Susan

Correspondence: NPS should grant the following A new trail between Devil's Gulch and Platform Bridge through the Cheda, McIsaac, and Zanardi Ranches.

A plan to connect the Cross Marin Trail into Point Reyes.

Adoption of social trails off Bolinas Ridge for better connectivity and a single-track trail experience.

Extend the Olema Valley Trail to Bolinas on the east side of Highway 1.

Close gaps for bikes through ranch lands in the park, including closing the Estero Trail loop, connecting Sir Francis Drake Blvd. with Pierce Point Road, and connecting Marshall Beach to Pierce Point Road,

A more bike-friendly permit application process for road and mountain bike events in the park, including along Bolinas Ridge and out to the lighthouse.

Bike access to all ranch roads in the pastoral zone that are already open to pedestrians.

#288

Name: Stewart, Matt

Correspondence: A must! This is an amazing addition to the cycling community and there's no reason we shouldn't be able to share this with hikers. A win win to both sides. A trail is a trail, we all should be able to share it equally. Thank you!

#289

Name: N/A, N/A

Correspondence: I support the following:

- 1.A new trail between Devil's Gulch and Platform Bridge through Cheda, McIsaac and Zanardi Ranch.
- 2.A plan to connect the Cross Marin Trail into Point Reyes.
- 3.Adoption of social trails off Bolinas Ridge for better connectivity and a single-track trail experience.
- 4.Extend the Olema Valley Trail to Bolinas on the east side of Highway 1.
- 5.Close gaps for bikes through ranch lands in the park, including closing the Estero Trail loop, connecting Sir Francis Drake Blvd. with Pierce Point Road and connecting Marshall Beach to Pierce Point Road,
- 6.A more bike-friendly permit application process for road and mountain bike events in the park, including along Bolinas Ridge and out to the lighthouse.
- 7.Bike access to all ranch roads in the pastoral zone that are already open to pedestrians.

#290

Name: Dietrich, Daniel

Correspondence: Thank you for the opportunity to comment on the GMPA process for Point Reyes National Seashore.

As a guide, I am in Point Reyes National Seashore nearly every day, bringing tourists into the park for the purposes of wildlife viewing and photography. I have guided hundreds of tours and many more hundreds of visitors in this amazing park. Tule elk are the number 1 or number 2 animal that my guests request to see. They are an iconic animal in this park and Point Reyes National Seashore is the only park in the nation where they exist.

Tule elk

In the past 6 months, I have had the absolute pleasure of watching Tule elk show up in places they have never been seen before. This is likely due to the NPS considerably slowing down or ceasing its hazing activities. The elk move to find water and food and it is simply magical to see them throughout the park as they would naturally be vs simply being confined behind a fence or as part of a hazed herd pushed into smaller areas. Guests marvel at this native animal and being able to see them in a variety of locations throughout the park has increased visitor experience tremendously.

I have great concerns over the consideration of using any lethal methods of population control for the elk. In its proposed alternative, the park states it may use lethal means to control the elk population to keep it between 100 and 160 animals. In another plan the park is considering removing the entire D Ranch herd.

How is this in line with the park's responsibility to protect our natural resources? There are approximately 100 elk that are in 'conflict' with 6,000 cattle. No Tule elk should be killed as a means to settle a conflict with cattle grazing in a National Park.

"Diversification"

The park again has failed to inform the public exactly what it means when exploring "diversification" opportunities for lease holders within the park. Diversification means the consideration for park land to be converted from grazing pastures to commercial row crops. It also means the consideration of allowing new domestic livestock such as goats, chickens, lamb, sheep, turkeys, pigs, ducks and other domestic animals. The public needs to be better informed of what is to be considered under the term "diversification". It is not just chickens.

The introduction of new farm animals

The introduction of any new farm animal will immediately put native bobcats, coyotes, fox and other predators at risk. Native wildlife may opportunistically take any of these newly introduced farm animals. Today, the national park is struggling to manage conflict with a grass eating elk. What new management plan will need to be implemented when conflict arises between predators and these newly introduced farm animals?

No new domestic animals should be introduced to Point Reyes National Seashore.

The conversion of grazing pastures to row crops

The introduction of row crops will again put native animals at risk. These pastures are home to countless numbers of native animals. Badgers and coyotes create their dens and have their offspring in these fields. They are hunting grounds for bobcats, coyote, owls, hawks and many other native animals and birds. Gophers, mice, voles, lizards, snakes, insects and countless other animals live and forage in these pastures. The conversion of these lands to row crops instantly takes away habitat for native wildlife. It will create conflict with rabbits, mice, gophers, insects and other native wildlife that may consume these row crops. The National Park Service will again be called upon to manage conflict between native animals and ranch operations. And again, native wildlife will suffer.

Additionally, these lands are today open to the public to explore. With the land conversion, these public lands become immediately inaccessible.

What about the public?

None of the possible alternatives adequately discuss any new opportunities for the public. Today there is nearly no public access to a significant portion of the land being covered by the GMPA process. There are very few gates that allow the public to access the fields. And where there are gates, most of them are locked. There should be no locked gates discouraging public access and additional gates should be installed providing more access to these public lands.

There should be further discussions about new trails in areas where there is clearly opportunity and minimal public access exists today.

Manure Spreading

The EIS should thoroughly review the current practice of raw manure spreading within the National Seashore. Perpetual piles of manure are prominent throughout the park. The spreading of this manure is likely the cause of the Tule elk contracting Johne's Disease. Knowing this, why do we allow the dumping of this very substance directly onto the very grass that the Tule elk eat?

The manure is likely polluting rivers and streams, spreading disease, is foul smelling and is unsightly. The roads are constantly covered in manure spilled from the trucks that distribute it. It detracts significantly from visitor experience. The EIS should address this practice.

Thank you, Daniel Dietrich

#291

Name: Herman, TC

Correspondence: More bicycle access would improve the park experience.

#292

Name: LLoyd, Cynthia

Correspondence: I migrated to California 9 years ago from New York City. I now have a house in Point Reyes Station and serve on the Board of the Environmental Action Committee. I have grown to love the Point Reyes National Seashore and its history. It is one of the most beautiful places that I have ever seen and deserves to be loved and protected for future generations. It is unique in combining a beautiful natural environment with active ranching that reflects more than 150 years of history.

My number one goal is to see that the natural resources of the Pt. Reyes National Seashore are protected and preserved. For ranching to continue, ranchers must be partners with the Park in this mission. Long-term leases should be contingent on ranchers commitment to the long term goals of protection and preservation of natural resources in the context of rapid environmental change and should be monitored over time for compliance. Best ranching management practices should be based on the best available science in order to reduce the climate related impacts of ranching.

Within the historical context of the seashore, I am strongly against diversification of crops. This is not historically or environmentally appropriate.

To the extent that some areas of the park have degraded habitats and poor water quality, these issues should be addressed and better future management practices introduced.

Visitor access is an important priority as well. More could be done to improve visitors interpretation areas and more clearly define trails.

#293

Name: Ullrich, Victor

Correspondence: Hello Folks, Regarding the population control of the Tule Elk in west Marin I imagine you are well aware of alternatives to lethal methods; the acronym TSVR (Trap-Sterilize-Vaccinate- Release) tried and tested with success with other species should be the obvious choice. After the culling of the Axis and Fallow Deer years ago in west Marin I opted after one donation not to continue my support for the Park Sevice. Many thanks, Victor

#294

Name: Darley, Mark

Correspondence: I believe it is essential that the ranchers have 20 year leases so that they can plan for the future and manage the land in a way that is healthy and sustainable for the long term. No rancher is going to manage land for the long term health of it if they have less than a 20 year future on it.

The Elk need management. They are over grazing both their enclosure and the ranch land. This is unsustainable both for the ranchers and for the health of the elk herd.

The NPC Alternative B is the best proposal, although I actually believe the elk should be more closely managed.

I grew up on an organic farm within National Park boundaries. There is no doubt in my mind that both the park, the elk and the ranches can be sustained if all parties have a long term interest in solving the problems. Farming and wildlife can coexist as shown by MALT.

#295

Name: Ember, Gertrude

Correspondence: The N.P.S has lost it's purpose if it chooses commercial cattle businesses to this degree over it's tule elk. The ranchers already have been given more than their parklands agreements. I think it is terribly sad. Does anyone in power care anymore? Care enough to actually stand up for the elk who were brought to these protected park lands to be protected? Are there any people strong enough to stand up for the elk?

#296

Name: Parker, Jeff

Correspondence: There is plenty of land for grazing available in the United States, not so much for wildlife. I depend on National Parks as areas where natural processes can continue in as a natural a way as possible today. The wild land and wild life that National Parks contain is a national treasure. Cows are everywhere. If there is a conflict between the elk and livestock, the livestock needs to go.

#297

Name: Ratcliffe, Jackson

Correspondence: Dear NPS,

I am an avid hiker and mountain biker and there is a lot of land near Olema that is insufficiently served with good trails. So I am in support of MCBC's proposals and specifically:

- 1) I would LOVE a trail from devil's gulch north. With Bill's trail finally opening again, that would make a wonderful adventure - redwoods and thick forest, and then open rolling hills with views. That would be great and I would regularly visit to enjoy.
- 2) there are a number of old social trails dropping from Bolinas ridge down to 1. Making a few of those official and bike legal would be fantastic.
- 3) i'd love to see an official trail between bolinas ridge and Olema.

#298

Name: Geldman, Robert

Correspondence: I wish to support alternative D, decreasing the ranching lands by 7000 acres. As a frequent visitor to the Point Reyes National Park I believe this option offers the best balance of rancher's desires and public access rights. Asking the national parks for increased support and subsidies for ranching, increased environmental degradation, decreased biodiversity is not in the public interest.

If the alternative D is not feasible then the only Alternative F is in the public interest.

#299

Name: Endlich, Susan

Correspondence: As a native of California, I have lived in the Bay Area my entire life. I strongly oppose allowing any ranchers to graze cattle on public lands. This is an outdated model and giveaway to cattle ranchers, there is no benefit to the public, and it is a detriment to wildlife on these lands, in this case the tule elk. It is time for California and the Bay Area to once again show an enlightened way forward and away from this unnecessary and detrimental give away of public lands. Now, more than ever, we need to protect natural habitats for wildlife and future generations of the public. The cattle industry and industrial animal agriculture in general, faces enormous challenges in terms of sustainability and impact on climate change. We should be forward looking towards protecting natural habitats and wildlife and not perpetuating outdated and harmful handouts to an energy inefficient and extractive industry. Isn't it time we start considering the true cost compared to benefits of "cheap" meat. It is a no win for the public to continue to give away the public commons to select private interests. Please let California stand for protecting natural habitats and wildlife from private commercial industry.

#300

Name: Kulik, Linda

Correspondence: Dear Park Planning;

I wish to express my very, strong objection to eliminating the Tule elk herds from Pt. Reyes National Seashore or any culling by killing. Also, existing commercial agriculture should not be expanded, such as by adding chickens, etc. Commercial agriculture should be phased out as originally planned and agreed to in 1978.

The proposal to entirely remove or cull Tule elk at Point Reyes is another is another fine example of how we continue to rank agricultural human impact above all else, even in this small protected piece of California coast. It builds upon the sad legacy of the last California grizzly killed in 1922, California coast redwoods reduced to 5%, gray wolves extirpated by 1924, and Tule elk reduced to 30 individuals by 1874. Thankfully, there are still Californians, like rancher Henry Miller who saved those last few Tule elk, who continue to value and defend our states biodiversity.

The land belongs to American taxpayers and commercial agriculture should not take precedent over endangered ecoregions and the biodiversity within them. Protecting the landscape for large, free roaming species, such as Tule elk, enhances the conservation and protection efforts for many other California plant and animal species. Tule elk co-evolved with native plant species including perennial bunchgrasses, oaks, and shrubs. These elk, a protected species endemic to (found only in) California, are a symbol of 140 years of conservation efforts in our state. They are a flagship species for the California Floristic Province, one of the worlds 25 most important biodiversity hotspots.

As a taxpayer, I resent Pt. Reyes National Seashore providing government subsidies to commercial, for profit, ranches and dairy farms. There is abundant commercial agriculture outside the Pt. Reyes boundary that provides milk and meat to Marin County and the greater Bay Area. Also, since building structures are now being designated as national historic sites, I can only assume even more government taxpayer funded subsidies will go to these

commercial activities. I strongly support phasing out commercial agriculture in the Pt. Reyes National Seashore, while leaving one or two historic examples, such as the Pierce Point Ranch.

That I must write a letter like this in the year 2018 to defend Tule elk in Pt. Reyes National Seashore is a disgrace and failure of our governments stewardship.

Respectfully,

Linda Kulik

cc: Senator Diane Feinstein, Senator Kamala Harris, Representative Gerald Huffman, Rene Voss

#301

Name: N/A, N/A

Correspondence: I am in support of option A (no action) or D (reduced ranching and management of the Drakes Beach Tule elk herd (D)).

The benefits of replacing dairy cattle with beef cattle (E) are not spelling out, though one could surmise there would be a reduction in human and vehicle traffic related to care of the cattle and transportation of milk which would be an overall benefit to the elk and the park in general. This option as my third choice.

Option (B) which includes hazing (no method described), translocation outside of the park if practicable (elk have Johne's disease which they contracted through cattle feces that makes relocation highly unlikely), or agency-managed lethal removal methods (likely), puts the welfare of the cattle (and ranchers/businesses) above the welfare of the indigenous Tule elk and other indigenous wildlife.

Option C is unthinkable. Option F is an extreme response.

Thank you for your consideration.

#302

Name: Mulholland, Emile

Correspondence: I'm writing both to support the requests being made by the MCBC and ask for more mountain bike trail riding opportunities near the Tomales Bay Youth Center. Our weekly mountain bike ride offers a chance to get outdoors, build fitness and increase their self confidence. It would be incredibly helpful to have more narrow trail options within a short ride from the youth center. Anything starting near Point Reyes Station, Bear Valley or Olema would be great. Bear Valley offers a wide dirt road where mountain bikers are tempted to ride at higher (and less safe) speeds than when we are on narrower winding trails. Opening some single track trails would help us keep the kids excited and engaged in getting to know the natural world. Thanks!

#303

Name: Herniman, Wendy

Correspondence: I oppose the removal of the tule elk from Point Reyes National Seashore since my priority is the conservation of land, water and wildlife rather than the protection of ranchers and their cattle. This ecosystem belongs to the American people and should be managed with a focus on habitat conservation for the benefit of future generations based on the long-term protection of biodiversity.

I am concerned about the ranching industry's history of overgrazing resulting in a loss of native plant species and the deleterious effects on our water supply from run-off, including eutrophication and increased levels of

sediment, herbicides, pesticides and antibiotics as well as a failure of ranchers to maintain the land properly with regard to fences, etc.

The tule elk are a major attraction for many people, bringing tourist money into the area, thus adding to the local economy and increasing the reputation of the Bay Area as a center of conservation based on its network of protected lands. Few people come to visit the cows.

#304

Name: Mazzella, Molly

Correspondence: I am an active cyclist living in the North Bay and I am writing you to ask that you improve bicycle access to the Point Reyes National Seashore by doing the following:

Create a new trail between Devil's Gulch and Platform Bridge through the Cheda, McIsaac, and Zanardi Ranches.

Create a plan to connect the Cross Marin Trail into Point Reyes.

Adopt social trails off Bolinas Ridge for better connectivity and a single-track trail experience.

Extend the Olema Valley Trail to Bolinas on the east side of Highway 1.

Close gaps for bikes through ranch lands in the park, including closing the Estero Trail loop, connecting Sir Francis Drake Blvd. with Pierce Point Road, and connecting Marshall Beach to Pierce Point Road,

Create a more bike-friendly permit application process for road and mountain bike events in the park, including along Bolinas Ridge and out to the lighthouse.

Allow bike access to all ranch roads in the pastoral zone that are already open to pedestrians.

Thank you for your attention.

#305

Name: Cohen, Susan

Correspondence: To Whom it may concern: This letter is written to support opening up bike trails in and near the park. I am a current board member of the Wherlman Cycling Club - a large group of very respectful and responsible cyclists. Many of us would love to get Off the road more often where we are often unwelcomed by cars and enjoy the beauty that nature holds. Please open more trails. Respectfully yours, Susan Cohen

#306

Name: Burger, Richard

Correspondence: I love the park as it is, and enjoy using it as a hiker. But I would like to see more opportunities for off-road bikes. These would include:

A connection between the Cross Marin Trail and Point Reyes could make a large difference. .

Extending the Olema Valley Trail to Bolinas (on the east side of State Highway 1) would also be an enhancement.

Connecting Sir Francis Drake Blvd. with Pierce Point Road.

Connecting Marshall Beach to Pierce Point Road.

Closing the Estero Trail loop could be achieved with relatively little effort.

Finally, allowing mountain bikes on the ranch roads that are already open to hikers would be an easy change to make.

I have witnessed many mountain bikers improving their awareness of their impacts on other uses over the last several years. For example, I notice more of them using bells to signal their approaching hikers. I think that continued public awareness campaigns on this matter would continue to make relations even better.

#307

Name: Armington, Julian

Correspondence: I'd like to voice my support for the following projects in Point Reyes:

A new trail between Devil's Gulch and Platform Bridge through the Cheda, McIsaac, and Zanardi Ranches.

A plan to connect the Cross Marin Trail into Point Reyes.

Adoption of social trails off Bolinas Ridge for better connectivity and a single-track trail experience.

Extend the Olema Valley Trail to Bolinas on the east side of Highway 1.

Close gaps for bikes through ranch lands in the park, including closing the Estero Trail loop, connecting Sir Francis Drake Blvd. with Pierce Point Road, and connecting Marshall Beach to Pierce Point Road,

A more bike-friendly permit application process for road and mountain bike events in the park, including along Bolinas Ridge and out to the lighthouse.

Bike access to all ranch roads in the pastoral zone that are already open to pedestrians.

#308

Name: Huffman, Vernon

Correspondence: Thank you for the opportunity to comment. Access4Bikes represents approximately 3000 local mountain bike enthusiasts. Mountain biking has grown much in popularity and now represents your second largest user group at around 40%. Unfortunately new mountain bike opportunities in Point Reyes Seashore and on GGNRA lands has been absent. It is time to review current connectivity gaps and loop opportunities for mountain biking. All improvements for mountain biking can also be shared with hikers and the two uses are very compatible. Also note that Access4Bikes can organize volunteer days to offset the financial burden of trail development/improvement. We are ready to help!

Here are the access improvements we are interested in seeing developed:

A new trail between Devils Gulch and Platform Bridge through the Cheda, McIsaac, and Zanardi Ranches.

A plan to connect the Cross Marin Trail into Point Reyes.

Adoption of social trails off Bolinas Ridge for better connectivity and a single-track trail experience.

Extend the Olema Valley Trail to Bolinas on the east side of Highway 1.

Close gaps for bikes through ranch lands in the park, including closing the Estero Trail loop, connecting Sir Francis Drake Blvd. with Pierce Point Road, and connecting Marshall Beach to Pierce Point Road,

A more bike-friendly permit application process for road and mountain bike events in the park, including along Bolinas Ridge and out to the lighthouse.

Bike access to all ranch roads in the pastoral zone that are already open to pedestrians.

Again, thank you for the opportunity to comment.

Vernon Huffman, President, Access4Bikes Foundation

#309

Name: Coughlan, Tobias

Correspondence: Thank you for the opportunity to comment. Here are the changes I hope to see developed. These changes would benefit both mountain bikers and hikers.

A new trail between Devils Gulch and Platform Bridge through the Cheda, McIsaac, and Zanardi Ranches.

A plan to connect the Cross Marin Trail into Point Reyes.

Adoption of social trails off Bolinas Ridge for better connectivity and a single-track trail experience.

Extend the Olema Valley Trail to Bolinas on the east side of Highway 1.

Close gaps for bikes through ranch lands in the park, including closing the Estero Trail loop, connecting Sir Francis Drake Blvd. with Pierce Point Road, and connecting Marshall Beach to Pierce Point Road,

A more bike-friendly permit application process for road and mountain bike events in the park, including along Bolinas Ridge and out to the lighthouse.

Bike access to all ranch roads in the pastoral zone that are already open to pedestrians.

Thank you.

#310

Name: Anderson, Craig

Correspondence: I greatly appreciate any increases to trail access that you can provide to me as a mountain biker.

Thank you, Craig

#311

Name: Chrostowski, Paul

Correspondence: Thank you for the opportunity to submit comments regarding the proposed General Management Plan Amendment. (GMPA). I have visited Point Reyes National Seashore (PRNS) for 2-3 weeks at a time annually for at least 30 years and have had an opportunistic to observe the changes in the park. In addition to being a recreational visitor, I hold a Ph.D. in Environmental Engineering and Science, am a registered Qualified Environmental professional (QEP), and have over 40 years of experience performing environmental impact analyses, thus my observations are informed by my education and experience. I am a member of the West Marin

EAC, Center for Biological Diversity, and National Parks Conservation Association. My comments fall into four broad areas: the EIS/GMPA process, existing environmental impacts of ranching, impact topics as listed in the fact sheet, and support for Alternative F: No Ranching and Expansion of Tule Elk and in opposition to Alternative B and diversification of agricultural uses in the study area.

EIS/GMPA Process From the process standpoint, the NPS has failed to justify the selection of the proposed alternative and failed to make adequate information available to the public. The NPS provided no analysis, rationale, or discussion of why this alternative should be preferred. Further, the National Environmental Policy Act (NEPA) at §1502.1 clearly directs that an EIS "shall inform decision-makers and the public of the reasonable alternatives that would avoid or minimize adverse impacts". There is no indication of how such an approach was used in selection of the preferred alternative. Arguably, even more significant is the lack of information provided to the public to support their ability to evaluate this, or indeed any, alternative. At a minimum, the PRNS website should contain an administrative record that provides full text or links to all significant scientific and policy information that was used to select the proposed alternative and may be used in decision-making. This would include documents such as the U.S. Geological Survey 2006 "Assessment of Hydrologic and Water Quality Data Collected in Abbotts Lagoon Watershed" and others. Especially important would be accessible data regarding water, soil and air quality within and proximate to the study area or analogous ranchlands managed by the NPS such as the resource inventory data found at <https://www.nps.gov/im/sfan/physical-resource-inventories.htm> and Storet data at https://www.waterqualitydata.us/provider/STORET/11NPSWRD/11NPSWRD-PORE_CADHS_NSC/. The public should not be forced to hire environmental professionals to have access to and interpret relevant data and information. NEPA clearly calls for analysis of three types of impacts - direct, indirect (or secondary), and cumulative. The natural environment at PRNS is already impacted by numerous stressors and a cumulative impact analysis is imperative. Perhaps paramount among these stressors is the number of visitors. The popularity of PRNS among nature-seeking urbanites has soared since the park's inception. It is not difficult to see the impact of visitors at the Palomarin trailhead where parking easily reaches capacity and at the Bear Valley visitor center where overflow parking is often required and where, on a holiday weekend, smoke from charcoal grills makes the air almost unbreathable. I have often observed illegal and often dangerous vehicular overcrowding at other parking areas including Estero Trail, Sky Trail, Pierce Point Ranch, and Muddy Hollow Trail in addition to overcrowding at the beaches. Some trails have become so crowded that negative encounters between hikers and equestrians or hikers and cyclists are unavoidable. There are adverse consequences from all this popularity that are almost too many to name. Soil compaction, litter, picking flowers and harvesting beach objects, inappropriate urination and defecation, vehicular exhaust etc., all can contribute to negative impacts. Many equestrians use PRNS trails, however, horses also have an impact through urine and manure which, on some trails, (especially in the Five Brooks area) can become both a physical and microbiological hazard. Not to mention problems with interactions between equestrians and elk on the Tomales Point trail which I observed interfering with normal rut behavior this year. In addition to the adverse effects from recreational use of the park, there are other less obvious, but potentially more severe impacts currently affecting the natural environment. These include the impact of *Fusarium circinatum* (pitch canker disease) on the Bishop pine, *Phytophthora ramorum* (sudden oak death) on tan oak (*Notholithocarpus* spp) and a variety of *Quercus* spp, and climate change impacts (drought, increased temperature, saltwater penetration into estuaries, ozone and fine particulate matter from wildfires, etc). All of the potential adverse impacts must be considered along with the direct and secondary impacts of continued ranching at PRNS in a cumulative impact analysis for each alternative.

Finally regarding process, Charles Eccleston in his classic NEPA and Environmental Planning outlines five common failings of the NEPA process including insufficient scoping, over-reliance on meetings, issue stacking, lack of citizen ownership, and lack of commitment to community-based solutions. The NPS should be mindful that it does not fall into one of these potential traps. For example, it currently appears that the NPS preference for Alternative B is being driven either by political concerns or project momentum. NEPA has a definite preference for alternatives with significant citizen input. NPS should always keep in mind that PRNS belongs to the people of the United States and not small communities of economic special interests.

Adverse Effects of PRNS Ranching Operations Existing and historical ranching operations at PRNS have clearly not minimized adverse environmental impacts, nor have they been conducted in accordance with the ethic of

"productive harmony" that is so important to NEPA. The available documentation does not inform the public that these ranching leases are categorically excluded from NEPA requirements and that this minimizes the amount of attention given to compliance. The effects of overgrazing on Point Reyes flora have already been well documented. Even a casual visitor can readily observe odor, atmospheric particulate entrainment, soil erosion, sediment transport to water bodies during rain events, apparent eutrophication, and poor vector control. The public may not be aware of less visible impacts such as plowing vegetation into the soil to allow planting of silage crops and the impact of this on avian populations and botanic diversity. Personally, I have been endangered by free ranging Black Angus bulls on the Estero Trail. The proximity of high cattle density to the sensitive areas of Abbotts Lagoon makes it seem that this water body is basically a sacrificial area. Unfortunately, enforcement of permits seems minimal and there are rarely enforcement officers available to the public to handle questions and complaints about cattle management and ranching. If there are periodic inspections to determine the degree of permit compliance, they should be made available to the public. The public should also be informed that these ranches are not required to post performance bonds and that the United States realizes very little in the way of income (the figure of \$7.00 per AUM is quoted in available permits) from these operations - far less than is required to mitigate their environmental damage.

Less obvious to the casual visitor is the degree of indirect environmental impact of cattle at PRNS. The 6,000 head of cattle cited in the documentation can produce approximately 126,000 tons of manure per year which can contain about 400 tons of nutrients (N and P₂O₅). Cattle manure has been shown to contain a wide range of human pathogens including E. Coli O157:H7, Salmonella spp, Campylobacter spp, Listeria monocytogenes, Yersinia enterocolitica, Cryptosporidium parvum, and Giardia lamblia. In addition to microbial pathogens, cattle manure has been found to contain a wide range of toxic heavy metals including arsenic, copper, zinc, chromium, cadmium, and lead. These microbes and metals accumulate in soil, are transported in the atmosphere as aerosols, and run off into surface water. The pollution from some 150 years of ranching at PRNS is likely significant, however, no baseline data for microbiological or chemical contamination in soil or surface water has been provided as part of this GMPA and none appears to be called for. It is clearly not possible to even assess adverse impacts, let alone minimize them, without comprehensive studies of water, soil, and air quality that quantify the baseline (no action) situation and compare the alternatives to each other for degree of further impact or mitigation.

Issues regarding Impact Topics The list of Impact Topics to be evaluated is vague and incomplete as follows:

- It is unclear what "Air Quality and Greenhouse Gas Emissions" refers to. Will this include odorants and hazardous air pollutants (HAPs)? Will the NPS be sampling the air or using modeling? Will greenhouse gas estimates include all sources (cattle direct, manure processing, forage planting and harvesting, vehicular traffic, residential and farm structure emissions)? How will the NPS deal with the increased potential for wildfire particulate to impact PRNS and the cumulative impact of particulate transport from the Central Valley in addition to particulate generated by cattle operations? Will mitigative effects of returning land to natural forest/chaparral/grassland be considered?
- Evaluation of biota appears to be limited to federally listed species. This should be broadened to include state listed species. In addition, the impacts on critical ecosystems including wetlands should be included. Abbotts Lagoon is a severely impacted yet ecologically important body of water in the study area-how will this specifically be addressed. Special attention should also be paid to potential impacts on designated wilderness areas. The biota evaluation should include indirect impacts (e.g. use of herbicides or insecticides toxic to pollinators) as well as direct impacts.
- The assessment of "Soil processes, Erosion, and Compaction" should include chemical and microbial quality including the accumulation of potential toxic metals through decades of application of manures, other fertilizers, and pesticides.
- It is not clear how NPS will assess water quality given the paucity of available information. Both surface water and groundwater need to be considered. Will NPS be taking additional measurements? Sampling runoff during the rainy season (which is recently underway) is the gold standard for evaluating non- point source discharges. Receiving waters including Abbotts Lagoon, Drakes Estero, and nearshore Tomales Bay should also be monitored. Modeling can also be used; however, the models should be validated for their particular application.
- Regarding visitor use, experience, and access, I have noted the overcrowding conditions of much of PRNS especially during the summer months and on holidays. Expanding the areas accessible to visitors would help to relieve the pressure on some of the more popular areas of the park. The

Tule Elk draw numerous visitors and expanding the range for Tule Elk will help to alleviate the pressure from congestion along Pierce Point Road, the parking at the Tomales Point tailhead and on the trail itself.

Support for Alternative F Given the lack of information, degraded state of the natural environment at PRNS, need for more and enhanced visitor facilities, the precarious nature of sensitive biota, cumulative impacts, and the potential for future adverse impacts from a changing climate, it is clear that only Alternative F is viable. The NPS has a heavy burden to demonstrate that Preferred Alternative B will avoid or minimize adverse impacts and result in the productive harmony that are the cornerstones of NEPA.

#312

Name: Gibson , Andrew

Correspondence: Mountain biking represents around 40% of trail users, but is extremely underserved with access to singletrack. Please create new multi use singletrack, and consider resignation of existing hiker or horse singletrack trails for multi use. Multi use singletrack works virtually everywhere else in the world, including in surrounding counties.

Here are the access improvements that would be appreciated by the cycling community:

A new trail between Devils Gulch and Platform Bridge through the Cheda, McIsaac, and Zanardi Ranches.

A plan to connect the Cross Marin Trail into Point Reyes.

Adoption of social trails off Bolinas Ridge for better connectivity and a single-track trail experience.

Extend the Olema Valley Trail to Bolinas on the east side of Highway 1.

Close gaps for bikes through ranch lands in the park, including closing the Estero Trail loop, connecting Sir Francis Drake Blvd. with Pierce Point Road, and connecting Marshall Beach to Pierce Point Road,

A more bike-friendly permit application process for road and mountain bike events in the park, including along Bolinas Ridge and out to the lighthouse.

Bike access to all ranch roads in the pastoral zone that are already open to pedestrians.

Thanks you,

#313

Name: Hunt, John

Correspondence: Here are the access improvements I am interested in seeing developed:

A new trail between Devils Gulch and Platform Bridge through the Cheda, McIsaac, and Zanardi Ranches.

A plan to connect the Cross Marin Trail into Point Reyes.

Adoption of social trails off Bolinas Ridge for better connectivity and a single-track trail experience.

Extend the Olema Valley Trail to Bolinas on the east side of Highway 1.

Close gaps for bikes through ranch lands in the park, including closing the Estero Trail loop, connecting Sir Francis Drake Blvd. with Pierce Point Road, connecting Inverness ridge trail to Sky trail, connecting Bear Valley trail to Stewart fire road and connecting Marshall Beach to Pierce Point Road,

A more bike-friendly permit application process for road and mountain bike events in the park, including along Bolinas Ridge and out to the lighthouse.

Bike access to all ranch roads in the pastoral zone that are already open to pedestrians.

Again, thank you for the opportunity to comment.

#314

Name: Constant, James

Correspondence: Enjoy walking, hiking, biking, kayaking with family of 4; support increased bike access to National Park Service lands such as Pt Reyes. Thank you for consideration.

#315

Name: Kruttschnitt, Mark

Correspondence: I would love to see greater bike access to the entire area, especially off of paved roads.

A new trail between Devil's Gulch and Platform Bridge through the Cheda, McIsaac, and Zanardi Ranches.

A plan to connect the Cross Marin Trail into Point Reyes.

Adoption of social trails off Bolinas Ridge for better connectivity and a single-track trail experience.

Extend the Olema Valley Trail to Bolinas on the east side of Highway 1.

Close gaps for bikes through ranch lands in the park, including closing the Estero Trail loop, connecting Sir Francis Drake Blvd. with Pierce Point Road, and connecting Marshall Beach to Pierce Point Road,

A more bike-friendly permit application process for road and mountain bike events in the park, including along Bolinas Ridge and out to the lighthouse.

Bike access to all ranch roads in the pastoral zone that are already open to pedestrians.

#316

Name: H, Ron

Correspondence: I agree with the priorities of the Marin Bicycle Coalition. My favorite single improvement would be #2.

1. A new trail between Devil's Gulch and Platform Bridge through the Cheda, McIsaac, and Zanardi Ranches.
2. A plan to connect the Cross Marin Trail into Point Reyes.
3. Adoption of social trails off Bolinas Ridge for better connectivity and a single-track trail experience.
4. Extend the Olema Valley Trail to Bolinas on the east side of Highway 1.

5. Close gaps for bikes through ranch lands in the park, including closing the Estero Trail loop, connecting Sir Francis Drake Blvd. with Pierce Point Road, and connecting Marshall Beach to Pierce Point Road,
6. A more bike-friendly permit application process for road and mountain bike events in the park, including along Bolinas Ridge and out to the lighthouse.
7. Bike access to all ranch roads in the pastoral zone that are already open to pedestrians.

#317

Name: Green, Ari

Correspondence: Dear leadership,

I would strongly endorse and support use of my tax money to extend the cross Marin trail and improve bike safety through national and state parkland in the area of Point Reyes and Samuel P Taylor Park. This should include: a new trail between Devil's Gulch and Platform Bridge through the Cheda, McIsaac, and Zanardi Ranches. It should also include a full extension of cross Marin from Olema to San Geronimo/woodacre and beyond.

My political support and financial support for the Parks program is entirely dependent on these efforts.

Sincerely,

Dr. AJ Green

#318

Name: N/A, Chris

Correspondence: For too long bikers have had limited access to this spectacular area in Marin County. Please ensure greater access by expanding the trails accessible to bikers and building new biking trails. Biking is a family friendly activity and I want to be able to ride in Point Reyes with my four mountain biking children.

#319

Name: Lloyd, Rachel

Correspondence: I would like to see more cycling opportunities in Point Reyes National Seashore.

A new trail between Devil's Gulch and Platform Bridge through the Cheda, McIsaac, and Zanardi Ranches.

A plan to connect the Cross Marin Trail into Point Reyes.

Adoption of social trails off Bolinas Ridge for better connectivity and a single-track trail experience.

Extend the Olema Valley Trail to Bolinas on the east side of Highway 1.

Close gaps for bikes through ranch lands in the park, including closing the Estero Trail loop, connecting Sir Francis Drake Blvd. with Pierce Point Road, and connecting Marshall Beach to Pierce Point Road,

Bike access to all ranch roads in the pastoral zone that are already open to pedestrians.

Thank you for your consideration,

Sincerely, Rachel Lloyd

#320

Name: Herzog, Herbert

Correspondence: I fully support the MCBC's request for the following bicycle access improvements at the Pt. Reyes National Seashore:

A new trail between Devil's Gulch and Platform Bridge through the Cheda, McIsaac, and Zanardi Ranches.

A plan to connect the Cross Marin Trail into Point Reyes.

Adoption of social trails off Bolinas Ridge for better connectivity and a single-track trail experience.

Extend the Olema Valley Trail to Bolinas on the east side of Highway 1.

Close gaps for bikes through ranch lands in the park, including closing the Estero Trail loop, connecting Sir Francis Drake Blvd. with Pierce Point Road, and connecting Marshall Beach to Pierce Point Road,

A more bike-friendly permit application process for road and mountain bike events in the park, including along Bolinas Ridge and out to the lighthouse.

Bike access to all ranch roads in the pastoral zone that are already open to pedestrians.

Bicyclist have been treated as second class citizens for too long, and it is time for a change.

#321

Name: Walsh, Jenny

Correspondence: I am a high school mountain bike coach, program lead for the Marin Chapter of Little Bellas (mentoring girls on bikes), and I was born and raised and still live here in Marin. I love my public lands and I want to preserve them for my own children and future generations of children. Enjoying our lands on bike is a healthy alternative to sitting indoors on a gaming console or smart phone. I teach stewardship and protection of our native species - - this activity is not in opposition to biking on the lands! We can take care of our plants and animals while still riding trails safely and with respect for all.

Thank you for the opportunity to comment. Mountain biking has grown much in popularity and now represents your second largest user group at around 40%. Unfortunately, new mountain bike opportunities in Point Reyes Seashore and on GGNRA lands have been absent. It is time to review current connectivity gaps and loop opportunities for mountain biking. All improvements for mountain biking can also be shared with hikers and the two uses are very compatible. Mountain bikers- -adults and students- -are ready to help!

Here are the access improvements we are interested in seeing developed:

A new trail between Devils Gulch and Platform Bridge through the Cheda, McIsaac, and Zanardi Ranches.

A plan to connect the Cross Marin Trail into Point Reyes.

Adoption of social trails off Bolinas Ridge for better connectivity and a single-track trail experience.

Extend the Olema Valley Trail to Bolinas on the east side of Highway 1.

Close gaps for bikes through ranch lands in the park, including closing the Estero Trail loop, connecting Sir Francis Drake Blvd. with Pierce Point Road, and connecting Marshall Beach to Pierce Point Road,

A more bike-friendly permit application process for road and mountain bike events in the park, including along Bolinas Ridge and out to the lighthouse.

Bike access to all ranch roads in the pastoral zone that are already open to pedestrians.

Again, thank you for the opportunity to comment.

#322

Name: Evatz, Richard

Correspondence: Please consider: new trail between Devil's Gulch and Platform Bridge through the Cheda, McIsaac, and Zanardi Ranches.

A plan to connect the Cross Marin Trail into Point Reyes.

Adoption of social trails off Bolinas Ridge for better connectivity and a single-track trail experience.

Extend the Olema Valley Trail to Bolinas on the east side of Highway 1.

Close gaps for bikes through ranch lands in the park, including closing the Estero Trail loop, connecting Sir Francis Drake Blvd. with Pierce Point Road, and connecting Marshall Beach to Pierce Point Road,

A more bike-friendly permit application process for road and mountain bike events in the park, including along Bolinas Ridge and out to the lighthouse.

Bike access to all ranch roads in the pastoral zone that are already open to pedestrians.

#323

Name: Ruddock, Peter

Correspondence: Point Reyes National Seashore is a unique place, which requires a unique management style. It needs to be managed both for nature and for agriculture. The juxtaposition of the two is its strength and its charm.

Nature should be given as wide a berth as possible. Tule Elk, the great ambassador to nature in the park, should be made to flourish. It is understood that in absence of natural predators, the reproductive rate of tule elk will cause them to eventually outstrip resources in the park, regardless of how much land they are given - it is just a matter of time. As such, they should primarily be restricted to non-agricultural lands and their population managed by humans as necessary. This management, as much as possible, should include relocation to other lands, park service and otherwise, which can benefit from having these beautiful animals in their area. Culling of the heard may be necessary under some circumstances, but should always be a last resort.

Agriculture at Point Reyes has unique potential in California. Current properties are very historical, generally picturesque and blend in well with the land. Encumbering them with certain practices as tenants of the Seashore seems reasonable, as long as it is acknowledged that such encumbrances will cost these businesses money. Where possible, financial assistance should be encouraged, be it a special designation promoted by the park service to increase business and value, grants, easements or the like. Encumbering the properties with wildlife and nature-friendly conditions seems particularly apt, such as Organic production, water limitations, holistic grazing, minimal fencing and more. Encouragement to agritourism seems particularly apt, and would be a great place for park partnerships and grants.

Decreasing antagonism between shareholders is an important goal, particularly in an era in which divisive tendencies predominate, and an area in which the park service should lead. Humans are an integral part of nature and must learn to live with it, rather than apart from it, as a fenced off wilderness. The National Park Service has a

special opportunity to lead the way in fostering the connection between humans and nature here at Point Reyes and should not shy away from leading.

#324

Name: MURPHY, KEVIN

Correspondence: I support extension of the Cross Marin Trail- -a safe off-street pathway through Samuel P. Taylor State Park- -to Point Reyes Station, and expand mountain and gravel biking access on trails and ranch roads.

I ride from Kentfield to PT Reyes station through Fairfax using Sir Francis Drake up White Hill from western Fairfax to Woodacre where I turn left onto San Geronimo Road to avoid the fast and dangerous automobiles on SFD. I then ride through neighborhoods until I must ride on SFD from Lagunitas to the Shafter Bridge where I begin riding through SP Taylor park until the Platform Bridge intersection. The ride up SFD to Olema is pretty dangerous. A safer alternate would be great for both bikers and auto traffic.

Please let it happen,

Thank you .

#325

Name: Weninger, Nancy

Correspondence: My big wish is for the Cross Marin Trail to be extended all the way to Point Reyes Station.

#326

Name: Handel, Brad

Correspondence: Here are the access improvements I am interested in seeing developed:

A new trail between Devils Gulch and Platform Bridge through the Cheda, McIsaac, and Zanardi Ranches.

A plan to connect the Cross Marin Trail into Point Reyes.

Adoption of social trails off Bolinas Ridge for better connectivity and a single-track trail experience.

Extend the Olema Valley Trail to Bolinas on the east side of Highway 1.

Close gaps for bikes through ranch lands in the park, including closing the Estero Trail loop, connecting Sir Francis Drake Blvd. with Pierce Point Road, and connecting Marshall Beach to Pierce Point Road,

A more bike-friendly permit application process for road and mountain bike events in the park, including along Bolinas Ridge and out to the lighthouse.

Bike access to all ranch roads in the pastoral zone that are already open to pedestrians.

Again, thank you for the opportunity to comment.

#327

Name: Roberts, K

Correspondence: Mellow mellow mellow West Marin is so awesome unless you happen to be walking or on a bicycle. Then it quickly turns into an unimaginable nightmare. You really need to do something to keep walkers and bicyclists more safe. The record number of fatalities on your streets is proof of this, as if any intrepid soul on a bicycle ever needed further proof. You are failing non-motorists on an epic scale - it shocks me every time I visit. Please pass needed reforms to help protect the rest of us - those of us who for various reasons find ourselves in West Marin without a car. It's so scary up there for us, and we always feel like 2nd-class citizens. It would be so wonderful - and so long-past overdue - if you would finally take measures to correct this imbalance.

#328

Name: Howard, Andrew

Correspondence: I wish to endorse the goals set forth for Point Reyes by the MCBC.

#329

Name: Sudlow, David

Correspondence: I fully support and agree there should be more trail access for bicycles in the Pt Reyes National Seashore

#330

Name: Eshelman, Rod

Correspondence: I strongly support the proposals by MCBC to improve access to point Reyes There are so many dead end trails that could be linked together, as well as adding more options for enjoying the area on a bicycle.

#331

Name: Schwartz, Ethan

Correspondence: Thank you for the opportunity to comment. I want to echo the stance of my local bike advocacy group, Access4Bikes, which represents approximately 3000 local mountain bike enthusiasts. Mountain biking has grown much in popularity and now represents your second largest user group at around 40%. Unfortunately new mountain bike opportunities in Point Reyes Seashore and on GGNRA lands has been absent. It is time to review current connectivity gaps and loop opportunities for mountain biking. All improvements for mountain biking can also be shared with hikers and the two uses are very compatible. Also note that Access4Bikes can organize volunteer days to offset the financial burden of trail development/improvement. We are ready to help! Here are the access improvements we are interested in seeing developed:

A new trail between Devils Gulch and Platform Bridge through the Cheda, McIsaac, and Zanardi Ranches.

A plan to connect the Cross Marin Trail into Point Reyes.

Adoption of social trails off Bolinas Ridge for better connectivity and a single-track trail experience.

Extend the Olema Valley Trail to Bolinas on the east side of Highway 1.

Close gaps for bikes through ranch lands in the park, including closing the Estero Trail loop, connecting Sir Francis Drake Blvd. with Pierce Point Road, and connecting Marshall Beach to Pierce Point Road,

A more bike-friendly permit application process for road and mountain bike events in the park, including along Bolinas Ridge and out to the lighthouse.

Bike access to all ranch roads in the pastoral zone that are already open to pedestrians.

Again, thank you for the opportunity to comment.

#332

Name: N/A, N/A

Correspondence: I am writing in support of the projects outlined by the Marin County Bike Coalition, especially those that will connect existing trails to keep bikes off hwy 1. These projects include:

A new trail between Devil's Gulch and Platform Bridge through the Cheda, McIsaac, and Zanardi Ranches.

A plan to connect the Cross Marin Trail into Point Reyes.

Adoption of social trails off Bolinas Ridge for better connectivity and a single-track trail experience.

Extend the Olema Valley Trail to Bolinas on the east side of Highway 1.

Close gaps for bikes through ranch lands in the park, including closing the Estero Trail loop, connecting Sir Francis Drake Blvd. with Pierce Point Road, and connecting Marshall Beach to Pierce Point Road,

A more bike-friendly permit application process for road and mountain bike events in the park, including along Bolinas Ridge and out to the lighthouse.

Bike access to all ranch roads in the pastoral zone that are already open to pedestrians.

#333

Name: Stires, Bob

Correspondence: I am an active cyclist in the North Bay and I am writing to ask you to make the following cycling improvements to the Pt. Reyes National Seashore. Create a new trail between Devil's Gulch and Platform Bridge through the Cheda, McIsaac, and Zanardi Ranches.

Make a plan to connect the Cross Marin Trail into Point Reyes.

Adopt social trails off Bolinas Ridge for better connectivity and a single-track trail experience.

Extend the Olema Valley Trail to Bolinas on the east side of Highway 1.

Close gaps for bikes through ranch lands in the park, including closing the Estero Trail loop, connecting Sir Francis Drake Blvd. with Pierce Point Road, and connecting Marshall Beach to Pierce Point Road,

Implement a more bike-friendly permit application process for road and mountain bike events in the park, including along Bolinas Ridge and out to the lighthouse.

Allow bike access to all ranch roads in the pastoral zone that are already open to pedestrians.

Thank you

#334

Name: Stock, Michael

Correspondence: Please connect the Marin Trail into Pt.Reyes Station. The road that now exists from platform bridge to Pt.Reyes Station is not safe for cycling. There is very limited separation between motor traffic and bicycles. Thanks

#335

Name: Letchworth , Cindy

Correspondence: Please protect the elk and all the other animals in this area. We need to be protecting not destroying. If the animals perish so do we.

Thank you

#336

Name: Melbostad, Bill

Correspondence: Dear NPS Folks,

As a lifelong Marin resident, I support the Marin County Bicycle Coalition's request to open Point Reyes' trails to cyclists. Bicycles are now providing increasing access to our open spaces to an ever expanding demographic of trail users, and they should be allowed equal opportunities that have been granted to hikers and equestrians. Of course, there are trails that are may not appropriate to be shared with hikers, which are not part of the MCBC request. Further, there is no reasonable basis for denying access to trails that are currently used by equestrians. I hope you view my request favorably, and agree cyclists should have equal access to Point Reyes' epic public lands.

Really, is it not all about providing chances for more people to enjoy the park lands and expanding the appreciation for our unique and beautiful wild-lands.

Thank You,

Bill Melbostad

#337

Name: Watkins, Boyd

Correspondence: As a senior citizen property owner in San Francisco and avid road and mountain bike rider, I strongly encourage responsible parties to support the following projects.

A new trail between Devil's Gulch and Platform Bridge through the Cheda, McIsaac, and Zanardi Ranches.

A plan to connect the Cross Marin Trail into Point Reyes.

Adoption of social trails off Bolinas Ridge for better connectivity and a single-track trail experience.

Extend the Olema Valley Trail to Bolinas on the east side of Highway 1.

Close gaps for bikes through ranch lands in the park, including closing the Estero Trail loop, connecting Sir Francis Drake Blvd. with Pierce Point Road, and connecting Marshall Beach to Pierce Point Road,

A more bike-friendly permit application process for road and mountain bike events in the park, including along Bolinas Ridge and out to the lighthouse.

Bike access to all ranch roads in the pastoral zone that are already open to pedestrians.

Sincerely,

Boyd Watkins

#338

Name: N/A, N/A

Correspondence: I'm writing to voice my strong support for increasing access for bikes in Point Reyes National Seashore. In particular extending cross Marin trail from platform Bridge to Point Reyes station is an extremely important project due to heavy traffic, impatient drivers and lack of any shoulders on any of the available roads to Point Reyes station

#339

Name: Bryce, Cameron

Correspondence: A new trail between Devil's Gulch and Platform Bridge through the Cheda, McIsaac, and Zanardi Ranches.

A plan to connect the Cross Marin Trail into Point Reyes.

Adoption of social trails off Bolinas Ridge for better connectivity and a single-track trail experience.

Extend the Olema Valley Trail to Bolinas on the east side of Highway 1.

Close gaps for bikes through ranch lands in the park, including closing the Estero Trail loop, connecting Sir Francis Drake Blvd. with Pierce Point Road, and connecting Marshall Beach to Pierce Point Road,

A more bike-friendly permit application process for road and mountain bike events in the park, including along Bolinas Ridge and out to the lighthouse.

Bike access to all ranch roads in the pastoral zone that are already open to pedestrians.

#340

Name: Ellis, Tim

Correspondence: I am an active cyclist in the North Bay and I am writing to ask you to make the following cycling improvements to the Pt. Reyes National Seashore. 1. Create a new trail between Devil's Gulch and Platform Bridge through the Cheda, McIsaac, and Zanardi Ranches. 2. Make a plan to connect the Cross Marin Trail into Point Reyes. 3. Adopt social trails off Bolinas Ridge for better connectivity and a single-track trail experience. 4. Extend the Olema Valley Trail to Bolinas on the east side of Highway 1. 5. Close gaps for bikes through ranch lands in the park, including closing the Estero Trail loop, connecting Sir Francis Drake Blvd. with Pierce Point Road, and connecting Marshall Beach to Pierce Point Road, 6. Implement a more bike-friendly permit application process for road and mountain bike events in the park, including along Bolinas Ridge and out to the lighthouse. 7. Allow bike access to all ranch roads in the pastoral zone that are already open to pedestrians.

#341

Name: Irvine, Ed

Correspondence: Here's some thoughts:

Create a new trail between Devil's Gulch and Platform Bridge through the Cheda, McIsaac, and Zanardi Ranches.

Make a plan to connect the Cross Marin Trail into Point Reyes.

Adopt social trails off Bolinas Ridge for better connectivity and a single-track trail experience.

Extend the Olema Valley Trail to Bolinas on the east side of Highway 1.

Close gaps for bikes through ranch lands in the park, including closing the Estero Trail loop, connecting Sir Francis Drake Blvd. with Pierce Point Road, and connecting Marshall Beach to Pierce Point Road,

Implement a more bike-friendly permit application process for road and mountain bike events in the park, including along Bolinas Ridge and out to the lighthouse.

Allow bike access to all ranch roads in the pastoral zone that are already open to pedestrians.

Thank you, Ed Irvine

#342

Name: Caesar, Wendy

Correspondence: The elk should have precedence over dairy farms and chickens and development and anything else non-native in the Park.

#343

Name: M, Pat

Correspondence: Please include more biking and walking paths throughout the national seashore. With staggering rates of diabetes and obesity, we need to do everything possible to get folks out of their cars and moving their bodies. Many people would bike or walk if there were more accessibility separated from the roads. My family is a perfect example; we walk or bike on separate pathways, but rarely ride on the street. Here are some specific items to include in future plans:

A new trail between Devil's Gulch and Platform Bridge through the Cheda, McIsaac, and Zanardi Ranches.

A plan to connect the Cross Marin Trail into Point Reyes.

Adoption of social trails off Bolinas Ridge for better connectivity and a single-track trail experience.

Extend the Olema Valley Trail to Bolinas on the east side of Highway 1.

Close gaps for bikes through ranch lands in the park, including closing the Estero Trail loop, connecting Sir Francis Drake Blvd. with Pierce Point Road, and connecting Marshall Beach to Pierce Point Road,

A more bike-friendly permit application process for road and mountain bike events in the park, including along Bolinas Ridge and out to the lighthouse.

Bike access to all ranch roads in the pastoral zone that are already open to pedestrians.

Thanks so much for all you folks do!

#344

Name: sowell, shiloh

Correspondence: More bike access to point reyes sounds great. I love the idea of more off highway routes, and I'm sure Automobiles would like it too.

#345

Name: Sellers, Matt

Correspondence: I would like to echo the desires/recommendations of the Marin County Bicycle Coalition. These include:

A new trail between Devil's Gulch and Platform Bridge through the Cheda, McIsaac, and Zanardi Ranches.

A plan to connect the Cross Marin Trail into Point Reyes.

Adoption of social trails off Bolinas Ridge for better connectivity and a single-track trail experience.

Extend the Olema Valley Trail to Bolinas on the east side of Highway 1.

Close gaps for bikes through ranch lands in the park, including closing the Estero Trail loop, connecting Sir Francis Drake Blvd. with Pierce Point Road, and connecting Marshall Beach to Pierce Point Road,

A more bike-friendly permit application process for road and mountain bike events in the park, including along Bolinas Ridge and out to the lighthouse.

Bike access to all ranch roads in the pastoral zone that are already open to pedestrians.

Thank you for accepting comments.

#346

Name: Brown, Ronald

Correspondence: Seems like a nice idea to get bikes on Pt Reyes. I think we could all share this wonderful natural asset in a sane and sensible way.

#347

Name: BEAZLEY, MORRIS

Correspondence: I support fully the plan and provisions to develop fuller trail and fire road access in the Pt Reyes/ West Marin area. I recognize that it must be done carefully and with the involvement of numerous constituencies. But absent a definitive plan, I fear we will see a less conscious and a potentially more negative result.

Please proceed with this important project.

#348

Name: McCormack, Joseph

Correspondence: Dear NPS: Although Marin County California is home to thousands of avid bikers, our safety is threatened by poor access to public lands in West Marin. I (and many others) ask for your help in extending roads throughout the Pt. Reyes National Seashore and extending the Cross Marin Trail into Pt Reyes.

Every year cyclists sustain serious and even fatal injuries when attempting to share the roads with cars in the West Marin/Pt. Reyes area. Our safety and enjoyment of the Pt. Reyes area depends on your help. Thanks- -Joe McCormack

#349

Name: Botelho, Ron

Correspondence: A new trail between Devil's Gulch and Platform Bridge through the Cheda, McIsaac, and Zanardi Ranches.

A plan to connect the Cross Marin Trail into Point Reyes.

Adoption of social trails off Bolinas Ridge for better connectivity and a single-track trail experience.

Extend the Olema Valley Trail to Bolinas on the east side of Highway 1.

Close gaps for bikes through ranch lands in the park, including closing the Estero Trail loop, connecting Sir Francis Drake Blvd. with Pierce Point Road, and connecting Marshall Beach to Pierce Point Road,

A more bike-friendly permit application process for road and mountain bike events in the park, including along Bolinas Ridge and out to the lighthouse.

Bike access to all ranch roads in the pastoral zone that are already open to pedestrians.

#350

Name: Schriebman, Judy

Correspondence: As much as I love West Marin ranching, the cattle and private ranchers cannot take precedence over the Tule Elk or the People's Public Lands, which the National Seashore is and was preserved to be. I am appalled by some of the ranchers who are clearly putting more cattle on their land than is supportable, resulting in erosion, sediment run off, manure run off, and unhealthy conditions. This land was designated and bought for the public use, for protecting the rare and endangered plant and animal species there for us and for future generations. This is now not happening. This is no different than opening up the Grand Canyon to mining or Yosemite as a quarry. Commercial operations should serve the park, not the other way around.

Does ranching further the purposes of the national seashore? Are park ranchers who sold their land entitled to permanently profit from it? Who benefits from ranching? Do those benefits outweigh impacts to the climate, land, wildlife, and public enjoyment of the national park? I do not believe that the public benefits are served by private profit making enterprises.

The ranches need to be analyzed for the impacts on the land and water. Good stewardship is to be encouraged; bad stewards need to be taken out of play. The Tule Elk require and deserve more protection than cattle and must have priority over ranching. Fences and shooting are NOT protective of the Elk. CAFO's and crowded cows are also a threat and a danger to public health and to the health of the Elk and cannot be allowed.

I call on the NPS to Preserve, Protect and Ensure the survival and wild land values of our National Seashore, as you have been directed to do. Ensure that our publicly held and funded national parks will be "unimpaired" for generations to come and not exploited and ruined by private, profit making enterprises.

#351

Name: Johnson, Donald

Correspondence: I would like to see more opportunities for mountain biking 1. A trail from Devils Gulch to platform bride road 2. Opening / extending the cross Marin trail to Point Reyes 3. Extending the Olema Valley trail to Bolinas 4. Allowing bikes on all ranch roads that are open to pedestrians 5. More trails for biking on Bolinas Ridge 6. More Trails for biking on Mount Vision Thank you Donald Johnson

#352

Name: Rathod, Devendra

Correspondence: I think that improving our ability to access National Park by bicycle is very important. I specifically support any plans to access Pt. Reyes National Seashore. Connecting the Cross Marin Trail into Pr. Reyes would be a great start!

Also, close gaps for bikes through ranch lands in the park, including closing the Estero Trail loop, connecting Sir Francis Drake Blvd. with Pierce Point Road, and connecting Marshall Beach to Pierce Point Road,

#353

Name: Robbins, Barry

Correspondence: Please consider opening up Point Reyes to sensible access for bicycles

#354

Name: Melton, William

Correspondence: Dear NPS,

Thank you for your excellent stewardship of our precious resources!

I have an interest in seeing the adoption of social trails off Bolinas Ridge for better connectivity and to enhance the biking experience in this area. Also, I would love to have an extension of the Olema Valley Trail to Bolinas on the east side of Highway 1. And connection of the Cross Marin Trail into Point Reyes.

I would also like to see a more bike friendly application process for events in the Pt Reyes Nat. Seashore area.

Thank you!

William Melton, MD

#355

Name: Eaken, Amanda

Correspondence: Please improve opportunities for safe cycling in Point Reyes! My family and I bike in Marin all the time and in order to preserve the natural beauty of this area, NPS should be encouraging more use of zero pollution transportation. I endorse the recommendations of the Marin County Bike Coalition.

#356

Name: Cotter, John

Correspondence: I agree with all of MCBC suggestions and would like to see more bike access in the Point Reyes Park.

#357

Name: Kidder, Nat

Correspondence: Hi, thanks for the opportunity to comment. Like many, I treasure the public lands that surround the Bay Area. When I visit Pt. Reyes, I cant believe how beautiful and varied the place is both in terms of topography, flora and fauna.

I do wish that more trails were open to bikes. It's frustrating that I can almost ride to wildcat camp from bear valley but not quite. Why not allow the opportunity for a loop instead of just an out and back over Fir Top?

When I hike and bike from 5 brooks I feel like I have intruded into the realm of a private horse stable. The dirty looks from riders, the trampled plants, the horse crap that absolutely covers the entire width of the fire roads, combines to leave a very bad impression of "public land".

A private playground for the elite is poor use of this incredible resource and I urge the NPS to re think the fair use of the trail system with particular focus on equality, connectivity and quality of experience for all user groups, especially those that are non polluting and human powered.

Thank you for your time.

Nat Kidder

#358

Name: troupe, dave

Correspondence: I strongly support improving bicycle access to the GGNRA and Point Reyes Seashore. Especially good would be an extension of the Cross Marin Trail from Platform Bridge into Point Reyes.

#359

Name: Randolph, Daniel

Correspondence: Here are the access improvements I am interested in seeing developed:

- A new trail between Devils Gulch and Platform Bridge through the Cheda, McIsaac, and Zanardi Ranches.
- A plan to connect the Cross Marin Trail into Point Reyes.
- Adoption of social trails off Bolinas Ridge for better connectivity and a single-track trail experience.
- Extend the Olema Valley Trail to Bolinas on the east side of Highway 1.
- Close gaps for bikes through ranch lands in the park, including closing the Estero Trail loop, connecting Sir Francis Drake Blvd. with Pierce Point Road, and connecting Marshall Beach to Pierce Point Road,
- A more bike-friendly permit application process for road and mountain bike events in the park, including along Bolinas Ridge and out to the lighthouse.

- Bike access to all ranch roads in the pastoral zone that are already open to pedestrians.

Thank you for the opportunity to comment.

#360

Name: Spindell, Aaron

Correspondence: Thank you for allowing me to request the following from our PUBLIC open space lands

A new trail between Devils Gulch and Platform Bridge through the Cheda, McIsaac, and Zanardi Ranches.

A plan to connect the Cross Marin Trail into Point Reyes.

Adoption of social trails off Bolinas Ridge for better connectivity and a single-track trail experience.

Extend the Olema Valley Trail to Bolinas on the east side of Highway 1.

Close gaps for bikes through ranch lands in the park, including closing the Estero Trail loop, connecting Sir Francis Drake Blvd. with Pierce Point Road, and connecting Marshall Beach to Pierce Point Road,

A more bike-friendly permit application process for road and mountain bike events in the park, including along Bolinas Ridge and out to the lighthouse.

Bike access to all ranch roads in the pastoral zone that are already open to pedestrians.

#361

Name: Lamb, Karen

Correspondence: Please discontinue the use of Point Reyes land for animal agriculture. These lands are for the enjoyment of all, not for the enrichment of ranchers. This has gone on long enough.

#362

Name: Bosco, Paul

Correspondence: Hi -

I support all projects proposed by MCBC for road and mountain bike access. The NPS must not discriminate against people with disabilities and physical ailments that prevent them from taking up this sport. This is why I also support all trails that have mountain/road cycling access to also have electric mountain/road cycling access as well. Many seniors and disabled citizens are now utilizing the benefits of electric bikes in order to stay in shape and enjoy the trails of Marin County.

Thank you for your consideration.

#363

Name: Hanley, John

Correspondence: Please approve

A new trail between Devil's Gulch and Platform Bridge through the Cheda, McIsaac, and Zanardi Ranches.

A plan to connect the Cross Marin Trail into Point Reyes.

Adoption of social trails off Bolinas Ridge for better connectivity and a single-track trail experience.

Extend the Olema Valley Trail to Bolinas on the east side of Highway 1.

Close gaps for bikes through ranch lands in the park, including closing the Estero Trail loop, connecting Sir Francis Drake Blvd. with Pierce Point Road, and connecting Marshall Beach to Pierce Point Road,

A more bike-friendly permit application process for road and mountain bike events in the park, including along Bolinas Ridge and out to the lighthouse.

Bike access to all ranch roads in the pastoral zone that are already open to pedestrians.

I am an avid cyclist and support all these improvements. Thank you

#364

Name: Harvey, Jim

Correspondence: Dear NPS/Pt. Reyes National Seashore management,

Please adopt the expanded multi use trails and access as proposed by Marin County Bike Coalition. Mountain bike access to public lands is far to small considering the number of tax paying mountain bikers, and expanding the number of trails and providing better ability to "connect" trails is something that is long over due. All non motorized users should have reasonable and equitable access to the beauty of the National Seashore and GGNRA. Thank you, Jim Harvey.

#365

Name: conner, eldon

Correspondence: As an avid local hiker and mountain biker it would be great to have more Access in Point Reyes national seashore. Here are some of the access point I would like to see developed.

A plan to connect the Cross Marin Trail into Point Reyes.

Adoption of social trails off Bolinas Ridge for better connectivity and a single-track trail experience.

Extend the Olema Valley Trail to Bolinas on the east side of Highway 1.

Close gaps for bikes through ranch lands in the park, including closing the Estero Trail loop, connecting Sir Francis Drake Blvd. with Pierce Point Road, and connecting Marshall Beach to Pierce Point Road,

A more bike-friendly permit application process for road and mountain bike events in the park, including along Bolinas Ridge and out to the lighthouse.

Thanks for the opportunity to comment. EMC

#366

Name: Roller, Aaron

Correspondence: Expanded biking in Pt. Reyes would be greatly appreciated for most trail users. Pt. Reyes national seashore is a large area so biking can provide more practical access to parts of the park than all day hikes. Given its remote location, it is unlikely to attract too many bikers at a given time. It would be great leadership by the NPS to expand bike access and help Marin get past its mountain bike banning policy so mountain bikers can spread beyond Tamarancho and China Camp. Thanks for your consideration.

#367

Name: Sponholtz, Thomas

Correspondence: Dear National Park Service, As a 30 year Marinite having brought up our two sons in Marin, I strongly believe that the best possible way to protect our beautiful nature is to invite young people to feel and touch it as often as possible. When we feel and experience nature, then we take care of it. Unfortunately, the inverse is also true. That means that we need to make nature accessible in a way young people would like to experience it and in a way that protects nature. Very few young people like to hike but they do like to bike and camp. So I encourage you to take leadership in making nature accessible to young people the way they like to experience it and protect it. The suggestion below is a good start, in my opinion:

A new trail between Devil's Gulch and Platform Bridge through the Cheda, McIsaac, and Zanardi Ranches.

A plan to connect the Cross Marin Trail into Point Reyes.

Adoption of social trails off Bolinas Ridge for better connectivity and a single-track trail experience.

Extend the Olema Valley Trail to Bolinas on the east side of Highway 1.

Close gaps for bikes through ranch lands in the park, including closing the Estero Trail loop, connecting Sir Francis Drake Blvd. with Pierce Point Road, and connecting Marshall Beach to Pierce Point Road,

A more bike-friendly permit application process for road and mountain bike events in the park, including along Bolinas Ridge and out to the lighthouse.

Bike access to all ranch roads in the pastoral zone that are already open to pedestrians.

Thank you very much for your consideration.

Cheers, Thomas

#368

Name: Longinotti, Cheryl

Correspondence: The new management plan should address access to Pt Reyes via bicycles comprehensively. Of tantamount importance to improve access is a connection between the Cross-Marin Trail and Pt Reyes.

#369

Name: Cahill, Gerald

Correspondence: I support the extension and conversion of "use trails" into properly engineered bike trails, paid for by cyclists. Every effort should be made to have parallel trails for bikes and hikers. Equestrians should be limited as they damage the trails and are no more necessary than motorized trail bikes

#370

Name: Moler, Doug

Correspondence: I support Marin County Bicycle Coalition priorities for increased bicycle access to Pt Reyes National Seashore including the following points:

A new trail between Devil's Gulch and Platform Bridge through the Cheda, McIsaac, and Zanardi Ranches.

A plan to connect the Cross Marin Trail into Point Reyes.

Adoption of social trails off Bolinas Ridge for better connectivity and a single-track trail experience.

Extend the Olema Valley Trail to Bolinas on the east side of Highway 1.

Close gaps for bikes through ranch lands in the park, including closing the Estero Trail loop, connecting Sir Francis Drake Blvd. with Pierce Point Road, and connecting Marshall Beach to Pierce Point Road,

A more bike-friendly permit application process for road and mountain bike events in the park, including along Bolinas Ridge and out to the lighthouse.

Bike access to all ranch roads in the pastoral zone that are already open to pedestrians.

Thanks for your consideration.

Sincerely, Douglas Moler

#371

Name: Miller, Hank

Correspondence: Please do not permit bicyclists on Pt Reyes trails.

#372

Name: Stevens, Claudia

Correspondence: Please DONT allow bikes on the trails at PT Reyes National Park. This is a Wilderness Area and bikes do not belong on the trail. It's unsafe on single track trails to have bikes on them not to mention the erosion issues caused by bikes.

#373

Name: N/A, N/A

Correspondence: Please protect the Pt Reyes National Seashore from ANY new bike trails. This is precious land which must be protected from all adverse effects suffered on many open spaces here in Marin County from damage, abuse, and destruction due to bicycle traffic. The bicycle community has proved itself to be entitled, irresponsible, and dangerous wherever cyclists ride. Bicycle traffic erodes the landscape and is disturbing to the local species of wildlife. It does NOTHING to conserve land which should be the primary goal of preserving our shrinking wilderness.

#374

Name: Grisham, Marie

Correspondence: I encourage the NPS to not extend bicycle access to more trails in Pt. Reyes Natl Seashore. Many of the trails are narrow and do not have a good line of sight. This endangers hikers and equestrians. Those trails that are on cliff sides are especially dangerous. While most bicyclists are respectful of other trail users, many are not and race down the trails. Please take this into consideration when making your decision.

#375

Name: N/A, Stephanie

Correspondence: Please do not allow more bicycle access to the Pt. Reyes wilderness trails.

#376

Name: Hayes, Sandra

Correspondence: I am writing regarding the push to allow mountain bikes on the trails at Point Reyes National Seashore. Please, please, please, leave this trails alone. Give us a place to go and not have to worry about being run down. A place where we can stop and enjoy the view without constantly having to be on the look out. Bicycles have been allowed on so many trails, especially in Marin County. Much of the public trail system in the County, State and Federal jurisdictions are overrun with bikes as is it. They don't have to have every single space. There is so much for them. Let them hike.

Sandra Hayes

#377

Name: Welzel, Rhonda

Correspondence: I hope that the bikers cannot take over any more of our Equestrian trails. There are so few we can ride without the worry of a bicyclist coming up from behind our horse, or worse come around a corner way too fast to stop. Even the best trained horses can get spooked from something coming out of no where and when we are riding on cliffs, its a danger to not only our horses, but our own lives in the event they should spook and bolt. Also, we as equestrians, pay our park dues when visiting and license our trucks and trailers. I have seen so many Bicycles just ride in without paying, and if they do not follow rules there is no license to jot down from there bikes; not to mention they all look alike with their helmets speeding away. I am not saying they all are bad, it seems like some are trying to co-habitat with us. But percentage wise it is really hard to find a trail we are free from the worry completely! Please keep the cross trail through Samuel P Taylor park to Pt. Reyes Natl. Seashore equestrian friendly. Thank you for your consideration.

#378

Name: Ballinger, Ken

Correspondence: Hello National Park Service,

I am a resident of Marin county. I am keenly interested in seeing humans make more room for native species. Habitat loss for ranching is a serious concern across the planet and within our own backyard. Even though animals are delicious, I have become vegetarian out of respect for the planet and to reduce the inhumane treatment of captive animals. I would prefer to see the ranches in the Pt. Reyes area go away to make room for the nearly extirpated tule elk and all the other affected creatures that call the area home. How many people visit the park each year to see commercial ranches? (I never have). How many people visit the park to enjoy the natural world and escape the destruction and stress of the "civilized" areas? I have, many times per year since I moved here in 2010. Let's please do the right thing and put the natural world before industrial priorities. It is a national seashore, after all.

Thank you for your consideration.

Sincerely, Ken Ballinger

#379

Name: Jarvis, Carolyn

Correspondence: Please do not allow bikes on any more Trails in Marin County. Especially the wilderness trails in Pt Reyes National Seashore. Bikes already have access to MOST of our trails. There is an aggressive campaign by organised groups of Mountain Bikers to access wilderness in order to make more challenging trails for themselves...they make illegal jumps and chutes, cut through pristine riparian areas, disturb wildlife, erode existing single track trails, endanger other trails users, and generally are unsuitable for wilderness areas. I have been using these trails for decades. Once the bikes come, the first round of users makes ruts, jumps and revises the landscape so that it gets used to the point of no longer being pristine and exciting, so the bikers want new areas to 'discover'....with no care for the historic use or permanent damage they leave behind. Please leave our wilderness alone...for the animals who traverse it on foot.....leaving no damage and less trace.....leaving it wild for the future.

#380

Name: britt, joyce

Correspondence: We waited a long time for the Ranch Management Plan. Scoping revealed the public's strong support to adhere to the original intent of the legislation for the acquisition of the Seashore; for the public and for wildlife. The commercial exploitation of any public land is egregious, but especially so in this park. 400 elk and 40 million cows, the choice here is clear, and cattle presence on PRNS shows why. The damage done to the waterways through fencing and pollution is evident, it is tragic and it is illegal under the enabling legislation. The constant erosion of the public's right to this land, its ownership is a taking for the benefit of profit. I hope that the plan will endorse the original legislative intent to protect, not destroy.

#381

Name: N/A, N/A

Correspondence: Horses and bikes do not mix - - - not on the single track trails - - you are asking for disaster - and more people being flown out to hospitals - - - - think of meeting a bike "powering" down Wittenburg Trail - my favorite for horses - - and so many other places we all ride. We were forced to quit riding at Annadel in Santa Rosa for the same reason - - -

#382

Name: Simon, David

Correspondence: To whom it may concern:

Pt Reyes National Seashore has long been completely devoid of opportunities for cyclists. It is time for that to change. I feel that the Olema Valley trail should be open from the Bear Valley Visitor Center all of the way to the Southern terminus of the trail. Currently the trail is closed to cyclists from the Bear Valley Visitor center to the Vehicle Horse Camping area. I can not understand why this trail is closed. Clearly it is non Wilderness. It is a safe alternate for HWY 1.

I'd like add support for the following projects at Pt Reyes National Seashore:

A new trail between Devil's Gulch and Platform Bridge through the Cheda, McIsaac, and Zanardi Ranches.

A plan to connect the Cross Marin Trail into Point Reyes.

Adoption of social trails off Bolinas Ridge for better connectivity and a single-track trail experience.

Extend the Olema Valley Trail to Bolinas on the east side of Highway 1.

Close gaps for bikes through ranch lands in the park, including closing the Estero Trail loop, connecting Sir Francis Drake Blvd. with Pierce Point Road, and connecting Marshall Beach to Pierce Point Road,

A more bike-friendly permit application process for road and mountain bike events in the park, including along Bolinas Ridge and out to the lighthouse.

Bike access to all ranch roads in the pastoral zone that are already open to pedestrians.

#383

Name: Blain, Matthew

Correspondence: Hello, This Ranch Planning Process allows for great improvements to Visitor Use, Experience, and Access.

In particular, bicyclist use, experience, and access can be improved.

I support the projects proposed by the Marin County Bicycle Coalition. In particular, this includes: * Connections to the Cross Marin Trail into Pt Reyes * Connections to Bolinas via extension of the Olema Valley Trail. * Adoption of user-created trails near Bolinas Ridge. * Closing gaps through ranch lands through new and opened existing routes. * Bike access to all ranch roads that are already open to pedestrians.

In addition, the permit system for road and mountain bike events in the park should be improved to increase access.

I am looking forward to improved access on this nearby national treasure.

Thank you, Matthew Blain San Francisco

#384

Name: corbett, kathryn

Correspondence: I have been visiting Point Reyes National Seashore for many, many years. Beginning when I lived in the East Bay, and even now that I am far up the coast in Eureka, I have always found it to be a unique piece of our already special California coastline.

I still recall the relief and even joy I felt, decades ago now, when the ranches were bought out so that the park could return to its natural state. I never understood why cattle were allowed on such a place, and now it was to be restored, with native fauna and flora. But this was not to be, for reasons that I have studied but which I cannot comprehend. What is the nature of this entitlement for the owners of the cattle that live on the Seashore, an entitlement that overrides us all?

Who should this special place be for? First, for the native plants and animals, both of which, if they could speak, would express a moral entitlement to this bit of land. Second, for the human population of the State, and yes, the entire country, as it is a national seashore. Do we travel so many miles to see cattle mired in mud and their own feces? This is a sight that can be seen throughout the West. There is no reason to have it here.

It is time to get the cattle out of Point Reyes National Seashore- -forever.

Please, please

#385

Name: Leaverton, Daniel

Correspondence: As a member of the MCBC, Marin County Bicycle Coalition, I write in support of the constructive comments shared by Vernon Huffman, President of Access4Bikes Foundation. Mr. Huffman's comments are quoted below. I can add to those comments my eagerness to ride trails in Marin and Point Reyes on NPS lands and to assist in the care and maintenance of those potential trails. As a holder of an Annual Pass I frequently visit National Parks and look forward to gaining even more access at Pt Reyes to further my outdoor adventures in nature.

"Mountain biking has grown much in popularity and now represents your second largest user group at around 40%. Unfortunately new mountain bike opportunities in Point Reyes Seashore and on GGNRA lands has been absent. It is time to review current connectivity gaps and loop opportunities for mountain biking. All improvements for mountain biking can also be shared with hikers and the two uses are very compatible. Also note that Access4Bikes can organize volunteer days to offset the financial burden of trail development/improvement. We are ready to help!

Here are the access improvements we are interested in seeing developed:

A new trail between Devils Gulch and Platform Bridge through the Cheda, McIsaac, and Zanardi Ranches.

A plan to connect the Cross Marin Trail into Point Reyes.

Adoption of social trails off Bolinas Ridge for better connectivity and a single-track trail experience.

Extend the Olema Valley Trail to Bolinas on the east side of Highway 1.

Close gaps for bikes through ranch lands in the park, including closing the Estero Trail loop, connecting Sir Francis Drake Blvd. with Pierce Point Road, and connecting Marshall Beach to Pierce Point Road,

A more bike-friendly permit application process for road and mountain bike events in the park, including along Bolinas Ridge and out to the lighthouse.

Bike access to all ranch roads in the pastoral zone that are already open to pedestrians."

Sincerely, Dan

#386

Name: Miller, Perkins

Correspondence: I support extending access to Pt Reyes, including:

- A plan to connect the Cross Marin Trail into Point Reyes.

- Adoption of social trails off Bolinas Ridge for better connectivity and a single-track trail experience.

- Extend the Olema Valley Trail to Bolinas on the east side of Highway 1.

- Close gaps for bikes through ranch lands in the park, including closing the Estero Trail loop, connecting Sir Francis Drake Blvd. with Pierce Point Road, and connecting Marshall Beach to Pierce Point Road,

- A more bike-friendly permit application process for road and mountain bike events in the park, including along Bolinas Ridge and out to the lighthouse.

- Bike access to all ranch roads in the pastoral zone that are already open to pedestrians.

Thanks

#387

Name: Medlock, Diane

Correspondence: I am Not in support of bicyc 'll we bring allowed in the wilderness trails at Pt. Reyes National Seashore.

#388

Name: Radlowski, Matthew

Correspondence: Hello, I would like to submit the following comment regarding suggestions for the NPS to consider as it reviews trail access in Point Reyes NP. As a mountain biker, conservationist, and lover of human powered exploration of our nation's woodlands, I request that the NPS consider the following:

1) A new trail between Devil's Gulch and Platform Bridge through the Cheda, McIsaac, and Zanardi Ranches.

2) A plan to connect the Cross Marin Trail into Point Reyes.

3) Adoption of social trails off Bolinas Ridge for better connectivity and a single-track trail experience.

4) Extend the Olema Valley Trail to Bolinas on the east side of Highway 1.

5) Close gaps for bikes through ranch lands in the park, including closing the Estero Trail loop, connecting Sir Francis Drake Blvd. with Pierce Point Road, and connecting Marshall Beach to Pierce Point Road,

6) A more bike-friendly permit application process for road and mountain bike events in the park, including along Bolinas Ridge and out to the lighthouse.

7) Bike access to all ranch roads in the pastoral zone that are already open to pedestrians.

Thank you for your time and consideration of these requests.

- Matt

#389

Name: Radlowski, Matthew

Correspondence: Hello, I would like to submit the following comment regarding suggestions for the NPS to consider as it reviews trail access in Point Reyes NP. As a mountain biker, conservationist, and lover of human powered exploration of our nation's wildlands, I request that the NPS consider the following:

1) A new trail between Devil's Gulch and Platform Bridge through the Cheda, McIsaac, and Zanardi Ranches.

2) A plan to connect the Cross Marin Trail into Point Reyes.

3) Adoption of social trails off Bolinas Ridge for better connectivity and a single-track trail experience.

- 4)Extend the Olema Valley Trail to Bolinas on the east side of Highway 1.
- 5)Close gaps for bikes through ranch lands in the park, including closing the Estero Trail loop, connecting Sir Francis Drake Blvd. with Pierce Point Road, and connecting Marshall Beach to Pierce Point Road,
- 6)A more bike-friendly permit application process for road and mountain bike events in the park, including along Bolinas Ridge and out to the lighthouse.
- 7)Bike access to all ranch roads in the pastoral zone that are already open to pedestrians.

Thank you for your time and consideration of these requests.

- Matt

#390

Name: rose, james

Correspondence: please allow access to bikes in pt reyes

#391

Name: Derrick, Paula

Correspondence: PLEASE keep the existing equestrian and hiker only trails and areas at Point Reyes National Seashore! While some horses and bikes can safely share the trails together, many cannot and there are already many, many trails that allow bikes and do not allow horses. Please allow us to continue enjoying the beauty of Point Reyes from horseback in a safe manner.

#392

Name: Berg, John

Correspondence: Protecting Pt Reyes is critical. It is our only wilderness land. There are trails that dogs and horses are not allowed on. It needs to be protected. Bikes are a gateway to crowds and habitat destruction

#393

Name: Merrill, Julie

Correspondence: No bikes on horse trails please.

#394

Name: Harmon, Ginger

Correspondence:

November 11, 2018

TO: Point Reyes National Seashore and Golden Gate National Recreation Area FR: Ginger Harmon RE: Comments on Park Planning Action Alternatives

Thank you for the opportunity to comment on Park Planning Action Alternatives.

I have visited the Point Reyes NS and the GGNRA on a regular basis ever since the National Seashore was founded. I was a Marin County resident and later I became a resident of San Mateo County. Both Point Reyes and GGNRA are places where I visited again and again to bask in the great beauty of those places.

For the last eight years, I have gone to Point Reyes with a group of friends from my continuing care community. We go in spring so we can enjoy the abundance of wildflowers under bright blue skies. Our first hike is always to Chimney Rock Point where we have found an amazing and glorious variety of wildflowers.

On the drive down the Pt. Reyes Peninsula past the ranches and dairy farms, we found very few wildflowers except along the edge of the road. I believe the reason for no wildflowers is the overgrazing has left the pastures covered densely with weeds, stubble and exotics. Sad to say it would seem grazing lands are not a place where wildflowers grow.

Overgrazing goes way back in the history of Point Reyes. When Point Reyes became a National Seashore a compromise was made to allow dairy ranchers to stay in place under lease for enough years to allow the original residents to remain for a fair period of time. However, those leases have now been renewed several times. Continuing ranching is contrary to the purpose of a National Park. National Parks are meant to provide, restore and protect natural phenomena. That has not what is happened at Point Reyes National Seashore. I think the time has come to end cattle grazing and dairy farming at Point Reyes National Seashore.

It is time to consider and act on the damage ranching and dairy farming are doing to the wildlife of the Seashore. The beautiful, rare and wild tule elk are seriously endangered. The elk are imperiled at Point Reyes NS largely because their likely grazing land is being used for dairy cows and cattle. I find it unacceptable for the National Park Service to allow grazing where it endangers wildlife. Alternative F is the only alternative ends grazing at Point Reyes.

I understand that the dairy farms have a cultural relevance. I think that relevance can be maintained by saving the dairy farm buildings and displaying them as such. Those buildings could have many uses by the National Park Service. In time the natural grasslands could be reestablished. That would surely make Point Reyes an even more natural and beautiful place.

I have offered reasons to urge the National Park Service to choose Alternative F. I hope you will consider these ideas along with the other benefits of Alternative F.

I urge you to adopt Alternative F. Thank you.

Respectfully,

Ginger Harmon

#395

Name: Matranga, Rosellyn

Correspondence: Please keep bicycles and motorized vehicles out this area. It should be for hikers and horses only. Thank you.

#396

Name: Cobb, David

Correspondence: I ride horseback regularly on the trails in the Pt. Reyes National Seashore. It is my understanding that a local bikers' coalition is now trying to gain access to these same trails. Although there are a few trails suitable for leisurely biking (Bear Valley Trail would be an example), most of the trails and fire-roads in PNRS would be of interest mainly to mountain bikers. In my experience riding throughout Marin and Sonoma

counties for decades, mountain biking is not generally compatible with either hiking or horseback riding, both of which are quiet and slow-paced. My concern is not the actual presence of a bicycle itself in the park, but rather to the general manner in which they are ridden on trails and fire-roads. Mountain bikers are not out there for a relaxing bike ride in the country. Even though most of these bikers try to be polite and to share the trails with others, the nature of the sport - fast, silent, and often at the edge of control - invariably results in dangerous or frightening surprise encounters with hikers or horses. A frightened hiker may cry out or even swear at the offender. A frightened horse can bolt, rear, kick, or gallop off endangering or even killing the rider or the bicyclist.

Making matters worse, there is a small, active and aggressive cadre of local mountain bikers whose members either demand and take access to each and every trail in local parks and open spaces, even cutting new trails if it strikes their fancy. On nearby Mt. Tamalpais, hiking and horseback riding have become increasingly hazardous as bikers insist on riding even the small trails on which bikes (and horses) are expressly prohibited, and in riding recklessly and fast on larger fire-roads. Confrontations have resulted in injuries to hikers struck by bikers. In one recent instance an elderly hiker was injured after being thrown off a small trail closed to bikes during a confrontation with a biker.

There is no practical way PNRS staff can protect hikers and riders from careless or aggressive bikers allowed in the park. And there is no evidence of which I am aware that mountain bikers are interested or effective in policing themselves. Please do not open the park to bicycles.

#397

Name: Collins, James

Correspondence: Prior to the GGNRA change in bike access rules in 1987?, I was a regular rider at Pt. Reyes and the Marin Headlands. The majority of bicyclists enjoyed the resource side by side with hikers and equestrians. We need to promote access to as many users as possible to insure the vitality of these valuable resources.

I join the Marin Bicycle County Bicycle Coalition in supporting the following:

1. A new trail between Devil's Gulch and Platform Bridge through the Cheda, McIsaac, and Zanardi Ranches;
2. A plan to connect the Cross Marin Trail into Point Reyes;
3. Adoption of social trails off Bolinas Ridge for better connectivity and a single-track trail experience;
4. Extension of the Olema Valley Trail to Bolinas on the east side of Highway 1;
5. Closing gaps for bikes through ranch lands in the park, including closing the Estero Trail loop, connecting Sir Francis Drake Blvd. with Pierce Point Road, and connecting Marshall Beach to Pierce Point Road;
6. Bike access to all ranch roads in the pastoral zone that are already open to pedestrians.

I realize these privileges come with responsibility to use the park safely and cooperatively. Thank you.

#398

Name: Reynolds, Anna

Correspondence: I have longed for years to ride horses at Point Reyes. It is legendary among those who have done so. However, living several hours away and the difficulties of finding ranch care during such a trip have prevented the execution of this dream. And now I hear that bicyclists want access to the horse trails too! PLEASE let there be places WITHOUT WHEELS! Bicyclists have SO many more miles of road and trail they can use. They already have PLENTY of places to enjoy their sport! Let there be places to ride horses that are safe from the threats posed by wheeled vehicles. Though there are many courteous interactions between equestrians and bicyclists, there are

also myriad instances of harm when they encounter each other. Even a polite, well-meaning bicyclist can spook a horse. And there seem to be more bicyclists who are anything but polite and well-meaning. To some, speed is the only thing that matters. Why bother to give such riders access to beautiful scenery when all they want to do is rip through it as fast as possible? I'm sure there are claims that horse hooves can damage trails. Bicycle tires do too, potentially more than horses. Especially on downhill slopes and at speed, it's probable that bike tires carve much more ground than horse hooves do. Horse riders tend not to gallop down hill, or to go just as fast in mud as in dry conditions. I hope those making a final decision in this matter are truly representative of all sides. Just because there are more bicyclists than equestrians does not mean bicyclists should rule everywhere. Bicyclists can still walk on a horse trail if they like! But equestrians cannot be sure of a safe pleasant ride on trails with bikes. I'm not sure equestrians could even WALK on bike trails safely. So please, preserve the few trails where horses may peacefully be ridden. It's the only fair way. I'm just one person who would like someday to fulfill a cherished aspiration: riding in this beautiful place without fear of a wreck or incident with bicycles. But I know there are many other equestrians who use Point Reyes much more and whose voices should carry significant weight in this matter. There really do need to be places without wheels. Thank you for considering my comments.

#399

Name: Fielding, Langdon

Correspondence: I am an equestrian and mountain biker that has been a part of the Point Reyes National Seashore for the last 30 years. It is truly one of the last safe places that you can ride horses without fear of collision with mountain bikes. I genuinely support both types of recreational use (horse riding and mountain biking) but I strongly believe that there should be a set of trails that are more of a "safe zone" for horses. Please do not open up the Point Reyes National Seashore to mountain bikes (greater than the current limited access). There are many wonderful trails in Marin County that share access and as equestrians we know the risks on these trails, but keeping Point Reyes "safe" is extremely valuable to all of us that ride.

thank you

#400

Name: eisenzimmer, marina

Correspondence: I am very concerned about the status of safe trails without mountain bikers. I have been in too many accidents and close calls with mountain bikers As I result I do not ride anymore. If they would be courteous and ride slower around riders and hikers things would be different, but do not. It is a shame they try to control all the comments and public opinion.

Please support the elk out in the country side.

Marina Eisenzimmer

#401

Name: Lawton, Georganne

Correspondence: Please limit bicycle access at Point Reyes. Many trails are steep and narrow. Based on my experiences in Nevad County on the trails, it is dangerous for bikes to share trails with pedestrians and equestrians - - they get going too fast and often have headphones as well so they can't even hear - Most of the valley trail is appropriate for multi use except toward the end near the beach - let them ride there only - - thank you

#402

Name: LaBarre, An

Correspondence: I have enjoyed Pt Reyes several times a year for many years. The trails are lovely. There is no other place like it. While I know bikers like the out of doors also, it is important that Equestrians and Bikers be kept separate for safety reasons. In some parks, where roads are wide enough to pass safely, considerate multi-use may be allowed. But on narrow single tract woodland trails multi-use is very dangerous. I respectfully request that Pt Reyes be preserved for pedestrian and equestrian use only.

#403

Name: McClelland, Jolynn

Correspondence: R & J McClelland Dairy Operating on the Historic "L Ranch" in Point Reyes National Seashore

November 20, 2018

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) General Management Plan (GMP) Amendment process - Notice of Intent to Prepare an Environmental Impact Statement for a General Management Plan Amendment published in the Federal Register on October 31, 2018. 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 the over twenty 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 it's Proposed Action included the ability for us to continue our 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.

As the NPS service begins to shift into the next phase of this process and focus in on the Proposed Action I would like to highlight some areas that need additions and clarifications:

1. Drake's Beach and Limantour Tule Elk herds-I propose a modification be made to the Proposed Action that the Drake's Beach and Limantour herds be removed from the agricultural properties within in this study. There have been numerous discussions and documentation on the conflicts that have risen due to competition over forage, damage to infrastructure and cattle over the years. 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. I am in full support of the Park continuing to manage the Tule Elk in other areas of the Seashore. This exercise only addresses the 28,000 acres of agricultural property within the Park. The Park has access to an additional 33,000 acres of Wilderness that could be developed, managed, and maintained for the Elk which should be explored as an option during this process. 2. Under-utilized housing-The Proposed alternative should also look into under-utilized housing to be made available for the farm workforce. By doing so, it would allow employees a shorter commute and the opportunity for their families to live in the community. More families living here would be a benefit to the local economy, school system and community organizations. 3. Farm grown hay and silage-This practice would allow us to have better weed management, balanced herd nutrition and the ability to store excess pasture that grows that we may not be able to graze off quickly enough. Having the ability to do this would result in less wasted forage and also fire prevention. Being able to grow and store our own feed will reduce the need for us to purchase imported supplemental feed. 4. Succession planning- -Develop a succession plan for each ranch in collaboration with each rancher in order to preserve and protect our cultural and historical integrity. Special consideration during the analysis phase should be given to include strategies that would help secure the continuation of the existing ranches and the ranching families going forward. 5. Leases-During this stage of the process I highly encourage the NPS to include and begin to look at a draft lease agreement in the GMP. Again, it would be most beneficial for NPS and ranchers to meet and discuss what that draft would look like. 6. Conservation Framework-When NPS announced this phase of the public comment periods they introduced the idea of each ranch having a "Conservation Framework". The way that framework is written right now has a lot of guidelines that are open to interpretation. There needs to be more collaboration with Ranchers and other ag groups in order for it to become a plan that will benefit the parties involved. I highly encourage NPS to have many more conversations and clarity around this idea with the Ranchers. We understand the value of having a solid plan in place that outlines best practices for the environment and native species. We are enthusiastic about coming up with those plans and sharing the management tools that we already have in place that takes all of those topics into consideration. One item I would like to see added to the Conservation Framework under the Ranch Core section is the opportunity for a Ranch to add a new structure to their Ranch Core. Here at L Ranch we would like to build a loafing barn for example. Loafing barns have long been used and proven effective during periods of inclement weather to manage herd health, protect wet pastures, and to better control the flow of manure. In recent years the Park has acknowledged the benefits of dairies having these management structures when they approved the most recent one to be built. We have identified locations with Park staff regarding the placement of said loafing barn-among already existing buildings within the Ranch Core. When analyzing the GMP Amendment, we request the study of the possibility of the L Ranch building a new loafing barn and other proposed projects from others to be considered that would support our abilities to be good stewards of the land. 7. Community Alternative-in the scoping letter submitted by PRSRA during this comment period, they included an attachment titled "The Community Alternative". This alternative should be reviewed and the points raised should be considered.

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

#404

Name: eisenzimmer, myron

Correspondence: there are already illegal bicycles in NPS. Opening up trails to bikes would only increase the number of accidents as evidenced by the horse and bicycle accident Nov. 23, 2015. Just yesterday, Nov. 24 bikes were seen on ridge trail at Five Brooks. This trail is not a bike trail.

The speed limit in the Park is 10 miles per hour in Pt. Reyes National Seashore. the bicycles are exceeding these speeds by at least 2x to 3x.

Also bikes are a danger to wildlife habit and native plants. The bikes do not always stay on designated trails and there are too many blind spots that bicyclists ignore.

Sincerely,

Myron Eisenzimmer

#405

Name: Watson, Mimi

Correspondence: In the spirit of keeping balance between all our wonderful outdoor activities I ask that you deny the bikers access to Point Reyes and maintain the walking and horseback riding presence. Thank you!

#406

Name: Adams, Linda

Correspondence: I am against allowing more access for bike riders for the reason that they already have adequate access and horseback riders need a few areas where they are not concerned about bike riders. In the past two months, when I've been out on the trail on my horse, we've had some incidents involving bicyclists coming down hill at high rates of speed. They are unable to stop in time without 1) frightening the horse, or 2) without either cyclist or horse having to go off-trail. In any instance, some trails that are narrow with steep sides, this can be extremely dangerous. Once recent accident where a rider came off her horse and was lying on the trail, a cyclist came speeding downhill behind the accident. In spite of our loud warnings of accident on the trail, he did not hear us and came around a blind curve. This frightened the horses behind the downed rider, causing them to bolt forward. Fortunately they did not run over the downed rider. The cyclist apologized but did not stop or even offer to help. There just needs to be some trails that horseback riders do not have to worry about those cyclists that ignore signs and courtesies of sharing trails.

#407

Name: Redlin, David

Correspondence: Mountain biking is a healthy, family friendly activity which can people a new appreciation for the outdoors and the amazing natural spaces that we share here in California. Hikers, mountain bikers and equestrians all love the experience of being in a natural setting on a narrow trail...access to fire road just isn't the same. Right now mountain bikers are left out even though we are a huge and growing user group. Remember the next generation of conservationists are likely mountain bikers today.

Please listen closely to the plans presented by MCBC and Access for Bikes. Their requests for new trail access and connectivity are fair and well thought out.

Thanks, David

#408

Name: Wyeth, Harry

Correspondence: We are absolutely opposed to permitting any more mountain bikes at Pt. Reyes. This would be a horrible move. As horse back riders, we know from experience that mountain bikes and horses are a bad and sometimes very dangerous combination. Riding a horse and a bike are very different experiences, and do not mix well. The peaceful experience of riding a horse must not be interrupted by fast moving and often dangerous mountain bikes. Please, do not allow further mountain biking!

HARRY WYETH

#409

Name: Gibbs, Dinah

Correspondence: I am an avid equestrian who enjoys riding in the Point Reyes National Park on a very routine basis. It is not only a beautiful serene area to ride but it is a pleasure not to have to worry about running into bikers on often steep and narrow trails. Bikers currently have access to 75% of all the trails in this wilderness area. Please consider the danger this presents to both equestrians and bikers if they attempt to share this difficult terrain. Thank you for your consideration

Dinah Gibbs

#410

Name: Jacinto, Richard

Correspondence: I'm a cyclist and would appreciate more opportunities to explore the park with my bike. I support Marin County Bicycle Coalitions proposed plans to increase access.

Thanks, Richard Jacinto

#411

Name: Gillette, Michele

Correspondence: Dear NPS,

Please do not open all trails and fire roads/ dirt roads to bicyclists/ mt. bikers. I am a hiker and equestrian with a 20 year history of riding mt. bikes in Marin Co. I do not agree that mt. bikes should have increased access in Pt Reyes National Seashore lands. In fact, I believe it will be very detrimental for a number of reasons, safety being the most important. We all know how high speed confrontations work out for the horse and rider.

Regards,

Michele Gillette

#412

Name: N/A, N/A

Correspondence: I know that you are receiving many comments from cyclists asking for increased access to trails at Point Reyes. I am asking you to resist these requests. Cyclists already have the right to use a very large percentage of the trails in Marin County; they do not need to disrupt the activities of those who use the trails in Point Reyes because it is one of the few places we can go to not encounter people on bicycles.

I come to Point Reyes to enjoy the trails, the ocean environment and access to the beach on foot and on horseback. It is a wonderful place for these activities, in part because I don't have to worry about being startled by

cyclists going as fast as they like without regard to other users. I urge you to protect the trails in this national park site for use by those who don't bring a bicycle.

#413

Name: Moore, Kelly

Correspondence: To whom it may concern:

My wife and 3 kids love Pt. Reyes and we love bike riding. Bikes allow us to get to places too far and long for hiking and as a non motorized form of travel with minimal or at least equivalent impact as hikers on the land. And we are great stewards. What we have access to gets taken care of. In my view, all trails could be open to bikes. However, I am amenable to the proposal by Marin Bikes group for limited expanded access. Please open more trails to bikes!

Kelly Moore

#414

Name: N/A, N/A

Correspondence: Please don't not allow bikes. As an equestrian; safe trails for me to safely ride are becoming more limited. The pt. reyes trails are narrow, has many blind turns and steep terrain at time; accidents will happen. Many bikers ride at fast speeds with music blaring in their ears so they do not hear a horse or a rider yelling at them to slow down. I've had several "almost" accidents with bikers in other parks. Bikers tend to go off trails which are plainly described as bikes not being allowed. Bikes still go on trails where bikes are not allowed. Bikes will add to further erosion on the trails. I ride my horses at point Reyes because I don't have to be on constant alert for oncoming bikers. I can relax. Please don't strip this tranquility away by allowing bikes access. There is plenty of already designated areas for bikes to go.

#415

Name: JOYCE, RADELL

Correspondence: Please do not let bikes on the Point Reyes trails. They have taken over many trails in Marin and also in the Sacramento area. I have to go 3 hours to Point Reyes so I can ride in safety and not have to keep looking over my shoulder for a bike behind me. I have had bikes skid to a stop under my horse when he is standing still. Even a courteous bike ride is a danger. When a bike rider got off his bike in the foothills to let an equestrian ride by his chain came off and made a strange noise. The rider was thrown. She is now a paraplegic. He felt bad but bikes and horses do not mix. Hikers are at risk also as the horses let us know if we are coming up on a hiker but the bikes just keep looking at the ground and ride into the hiker.

Bike hate staying on the trails and do a lot of damage. Hidden Falls in Auburn spends a lot of its budget putting barriers over new trails the bikes make everyday. It seems they view a stay on trail sign is an invitation to break the rules.

We need a place to ride safely. we support the economy all year round. We support feed stores, farmers, farriers, veterinarians, trailer sales, trucks repairs, trucking industry. and many others. We can not just put our horses away during bad weather we pay lots of upkeep year round using them or not!!!

#416

Name: N/A, N/A

Correspondence: I am both a horseback rider and a bike rider, and I'm writing to urge you to say no to bikes in Point Reyes. The trails are fragile and it's the only place in Marin where one can still safely ride a horse on trails. In any case the bikes already have access to the big arteries, where horses don't go on weekends. I've given up riding horses on Mount Tam, where I rode regularly for years. It's just not worth getting taken out by a bike on a blind corner. Please keep the trails safe for riders and hikers in Point Reyes and keep the mountain bikes elsewhere.

Thanks

#417

Name: Prevost, Leslie

Correspondence: Dear Sir and Madames, as an equestrian and hiker I value the wilderness and natural quiet of the trails. I feel that as an avid hiker I prefer the trails that do not allow bikes. I believe that it is important that the visitor experience be maintained for the majority (foot folks). We are concerned for our safety and are disrupting our experience by the fact that we are constantly looking over your shoulder for speeding bikes. The bikers already have 75% - I feel that is enough. As an equestrian with a well trained horse who is not afraid of bikes, I still prefer to ride areas that are not frequented by the unruly biker that is often rude to folks on horseback. I have more than one occasion coming around a blind curve and nearly colliding with a speeding biker. I feel that for the safety and natural experience of the trails, segregation is vital. They have over 75% of the trails already. Please keep the remaining portion for horses and hikers only.

#418

Name: N/A, N/A

Correspondence: I am an avid hiker and equestrian who frequents Pt Reyes environs. My enjoyment comes through the quiet and beauty that I experience. I have been in other areas near my home that have bikes on single track trails as well as more open trails. I have been knocked down by a bike twice when they had headphones on and were looking down, not in front of them. Luckily this has not happened on my horse. The bikes now have access to 75% of the trails. Please keep the rest of the trails for hikers and equestrians use only to afford a relaxing time on Pt Reyes remaining trails bikes are not allowed on. There are more walkers and hikers that use these trails than others. Thank you.

#419

Name: Goldman, Ronda

Correspondence: Please, Please retain equestrian and shared use of these trails. My children and I have been enjoying these trails for years. As the 2019 President of San Francisco Horsemen's Association, our membership pleads with you to preserve equestrian access. Many of our members have enjoyed these trails and campouts since 1965. Thank you. Ronda Goldman. SFHA 2019 President.

#420

Name: Bacon, Mary Ann

Correspondence: I grew up riding many trails in Marin County. I can no longer ride in the Marin Municipal Water District land around all the lakes because of the bike riders. There are too many and they go too fast and spook the horses. I have many friends that have been injured from encountering speeding bikers. The Point Reyes trails are one of the few places I feel I can safely ride. These trails were divided up years ago when Col. Frank Boerger chaired the Golden Gate Recreation District. He got it right. Many people over the years have said he was the best Chairman and we should leave it the way it is.

#421

Name: N/A, N/A

Correspondence: I support the Marin County Bicycle Coalitions efforts to make Point Reyes a more friendly place for all visitors. Specifically, I support: A new trail between Devil's Gulch and Platform Bridge through the Cheda, McIsaac, and Zanardi Ranches.

A plan to connect the Cross Marin Trail into Point Reyes.

Adoption of social trails off Bolinas Ridge for better connectivity and a single-track trail experience.

Extend the Olema Valley Trail to Bolinas on the east side of Highway 1.

Close gaps for bikes through ranch lands in the park, including closing the Estero Trail loop, connecting Sir Francis Drake Blvd. with Pierce Point Road, and connecting Marshall Beach to Pierce Point Road,

A more bike-friendly permit application process for road and mountain bike events in the park, including along Bolinas Ridge and out to the lighthouse.

Bike access to all ranch roads in the pastoral zone that are already open to pedestrians.

Furthermore I ask that you kindly not bend to the xenophobic will of others to arbitrarily disallow bicycles and their riders from this beautiful land. Trail damage and erosion is not an issue on trails already allowing horses, as bikes and their riders have only a fraction of the impact on the trail. Of course as always, remember to be nice, and say Hi.

#422

Name: murphy, margaret

Correspondence: Thank you for the opportunity to comment on proposals for the tule elk population in point reyes, CA. Following a sad history of this native of California and other native wildlife after being hunted to near extinction, efforts were made to save these animals. How ironic that now their numbers are increasing a plan is underway that includes "lethal removal" I am against this method and the method of "translocation". These are native beasts!! The cows are not. I would rather see a reduction of cows. Thank you

Margaret Murphy

#423

Name: Creger, Cassandra

Correspondence: Please continue to allow Point Reyes National Seashore Park , as one of the few wilderness areas available to equine riders, exist as it does today. Bikers are allowed on roughly 75% of all Marin County trails now and there is getting to be nowhere to ride our horses and enjoy the wonder and beauty of Point Reyes. My husband and I regularly travel 3 1/2 hours from our home just to ride our horses at Point Reyes. We certainly contribute our share to the economy of Point Reyes Station and Olema as do our fellow equestrians. Please do not be pursued by the vociferous biking lobby. Sincerely, Cassandra Creger

#424

Name: Schwartz , Cody

Correspondence: Dear whom it may concern,

As someone who spends a good portion of my time in the outdoors camping, hiking, mountain biking, and exploring; I would like to express my support for expanding bicycle access into Point Reyes National Seashore. I have enjoyed several backpacking trips and day trips into the park and each time have thought how the trails would be perfect for multi use with bicycles. Riding a bike is quiet, safe, human powered, and causes no more impact to the trail than hikers.

Many of the trails within Point Reyes are wide enough to allow safe passing and the single tracks are spread out far enough I believe people could share the trails successfully. There may be certain areas where bicycle access doesn't make sense, but I believe these should be assessed on a case by case basis and not just be banned entirely.

Please take the support of bicycle access by myself and others into consideration when making your decision. I would love to enjoy a cycling trip through Point Reyes some day.

Thanks,

Cody

#425

Name: Hurney, Frances

Correspondence: Please do not allow bicycles at Point Reyes, there are plenty of bike trails in the area and some bikers are not polite to horseback riders. We need a place to feel safe and enjoy the beauty the park provides us.
Frances M Hurney

#426

Name: N/A, N/A

Correspondence: I grew up riding my pony and horses in Pt Reyes National Seashore and in the surrounding hills of what is now Golden Gate National Recreation Area. Many of the trails are not suitable to Mountain Bikes, and I oppose opening up more trails to bikes. There is a serenity to being on foot or on hoof that is destroyed when a person has to worry about being run into by cyclists going too fast, and too unaware of what might be around the next corner. Please so not open up any more trails to mountain bikes.

#427

Name: Lenz, Mike

Correspondence: I want to voice my support of the following projects! I love riding my mountain bike around the area.

YES PLEASE TO ALL OF THESE:

A new trail between Devil's Gulch and Platform Bridge through the Cheda, McIsaac, and Zanardi Ranches.

A plan to connect the Cross Marin Trail into Point Reyes.

Adoption of social trails off Bolinas Ridge for better connectivity and a single-track trail experience.

Extend the Olema Valley Trail to Bolinas on the east side of Highway 1.

Close gaps for bikes through ranch lands in the park, including closing the Estero Trail loop, connecting Sir Francis Drake Blvd. with Pierce Point Road, and connecting Marshall Beach to Pierce Point Road,

A more bike-friendly permit application process for road and mountain bike events in the park, including along Bolinas Ridge and out to the lighthouse.

Bike access to all ranch roads in the pastoral zone that are already open to pedestrians.

#428

Name: Catt, Jazzyy

Correspondence: Please don't take away more horse safe trails. Adding bikes to these beautiful trails is not a good idea. Too much has already been taken away from horse enthusiast. Thank you

#429

Name: Keller, Phyllis

Correspondence: As an equestrian for most of my life I have come to love riding on the serenity of mountain trails. I also love the ocean trails found at Pt. Reyes National Seashore. Over the course of many years I have experienced the peacefulness these trails bring from horseback. Sadly, more and more of our riding and hiking trails are being poached or taken away by or for the biking community. While I harbor no ill will towards bicycle riders, they are not a good mix with horses or hikers. Many accidents have occurred because of the speed at which you meet and the lack of understanding by bicycle riders of the affects on horses. It is not a good mix for the safety of horseback rider or the animal itself. Aside from the safety issue, bicycle riders just cant seem to keep to the established trails. In the Truckee area many of our trails have been greatly abused by riding the corners too high or dragging deadfall into place to establish jumps. Its there to see if you want to investigate for yourself. Additionally new trails pop up everywhere. It is my understanding that 75% of the trails at PT. Reyes are open to bikes. As an equestrian I am aware of the continual loss of trails open only to horses and hikers. With every mile lost we lose a safe and peaceful area where we can ride without the worry of possibly being thrown and badly injured. It happens all the time when this dangerous mix of horses and bicycles is introduced. It is unfortunate that separation is necessary, but it is for the safety of all. Please keep the trails which are designated for equestrians and hikers free from this hazardous mix. Thank you for your time. Phyllis Keller

#430

Name: Moreno, Frank

Correspondence: I understand that you may be considering opening the wilderness area trails near Pt Reyes to bicycle traffic. For what it is worth, I am opposed to this for the following reasons: I don't believe that mountain bikes are compatible with the wilderness areas. I have expressed this concern to Congressman McClintock earlier this year. His reply was " ... a year after he signed the Wilderness Act of 1964, Lyndon Johnson said, "The forgotten outdoorsmen of today are those who like to walk, hike, ride horseback or bicycle. For them we must have trails as well as highways." I responded to him that bicycles in the days of Lyndon Johnson were much different than those today. Today's mountain bikers are driven to get from Point A to Point B as quickly as possible, not to enjoy the exquisite scenery in the wilderness. Customary trail etiquette to yield to horsemen and hikers is also quickly diminishing. I fear that our wilderness areas will become racetracks and resulting accidents will tax our emergency responders and be detrimental to hikers and horse riders.

I have been on trails shared with bikes and seen, more than once, a speeding bicyclist spook a horse off the trail and continue on his way as the horseman tried to regain control. This type of behavior will take more of the Park staff's time with complaints, compliance, enforcement, accidents and rescues, not to mention the additional trail maintenance. As a horsemen, we typically work on improving the trails we use, clearing, re-marking, rebuilding. I have not yet seen bicycle folks doing the same.

Congressman McClintock said that we will have to lobby our local land managers to keep the wilderness areas we use limited to current use; which is what I am requesting of you. As I told him...My other concern is precedence. Most of the "outdoorsmen" now are migrating to quads and side-by-sides. I hope they are not the next to believe they are being left out... Just some food for thought...

Thank you. Frank Moreno

#431

Name: Pollock, Steven

Correspondence: I do think it's important to share this national treasure and your plan is a good start. I fully support more cycling/running/hiking trail access and the examples of good behavior by the public using right of ways are plentiful in Marin County. I am a (financially) MALT supporter as well and see both sides. However, I do think it's important to have right of ways across then entire county with trail access. There is no reason why the ranches and the public trail use cannot co-exist in Marin, let's make it happen.

#432

Name: Badenhoop, Lucy

Correspondence: Ref the wilderness areas around Pt Reyes:

I do not feel that bicycles belong in the wilderness....they go fast and tear up the trails. When multi-use was introduced, bikes were used by families for outings at a slow peddle. Now the concept is outdated....mountain bikers are are intent on the thrill of speed and jumps....not conducive to shared use with hikers and equestrians.

Bicycles should share trails with other wheeled vehicles (OHV) on their own trails.

#433

Name: N/A, Gail

Correspondence: Dear Park Planning personnel,

I am pleased to see folks enjoying our public lands including hikers, horseback riders, bicyclists, campers, and other outdoor enthusiasts. However, I believe there must be balance that reflects the environment as well as appropriate and safe access. For many years I've been an avid hiker, camper, and horseback rider. And I have friends who enjoy off-road vehicles and bicycling. While public lands should accomodate different activities, some of these activities are difficult or unsafe when trying to share the same place.

As the number of people increases that participate in trail or mountain bicyling, more and more trails are given over to that activity. As I've personally experienced in the El Dorado National Forest, the Auburn State Recreation Area, and many other places, this has resulted in loss of safe trails for horseback riding and sometimes for peaceful family trail hiking.

I've noted that there are many miles of trails open for bicyclists in Marin County. I hope you will consider this and not open up beautiful trails to users that are not compatible and does result in altering the quality of the trails for other users.

#434

Name: Bonde, Nancy

Correspondence: I really don't think that its a good idea to allow bicycles on the Pt. Reyes trails. I love riding my horse there, but its not fun hiking or riding your horse on trails when you are always having to listen for bikes. Some come flying down the trails so fast they can barely stop in time before running into my horse. My horse is fine with bikes, she has no problem with them at all, but it scares me to death when I'm riding down the trail on a hill, and all of a sudden you hear a bike comes flying down the hill behind you, they go so fast, and some don't pay any attention to what's in front of them, we, as horseback riders have to yell a wave our arms to get their attention so they can stop before running into the back of our horses. My horse is fine with bikes now, but she wouldn't be if someone ran into the back of her on a bike!! It is an accident waiting to happen. The bicycles have a lot more area to ride on than we have to ride our horses on, please don't allow bicycles on the trails that are now are for only hikers and equestrians, please!!!

Thank You, Nancy Bonde

#435

Name: KRIL, MERVIN

Correspondence: I believe it would be a grave injustice to the land should bicycles be allowed on the Point Reyes trails. I've ridden many equestrian areas throughout California and those at Pt.Reyes represent a special place that my wife and I visit many times yearly .Their varied microclimates with well marked signs are enjoyed and respected by both equestrians and hikers. Over the years I've noticed a change in the demographics of bicyclists. In the past they consisted of nature lovers who were considerate of others and the trails. Unfortunately lately a majority are much younger and more interested in how quickly trails can be traveled. Certainly we've had a problem in Nevada County when the Hoot trail was built as a multi use trail. This was subverted by bicyclists whose main goal was to barrel downhill as fast as possible and even, in some cases, post their times and speeds online. Needless to say this was a hazard to riders and hikers on the trail. Interestingly rarely did a bicyclist go uphill.

Please strongly consider how bicyclists on these trails will negatively impact the trails, the land, the current users and the spirit of John Muir.

Sincerely Merv Kril

#436

Name: Lind-White, Lauri

Correspondence: I am writing as a hiking and horseback riding advocate in the Pt. Reyes National Seashore. The Pt. Reyes National Seashore is an amazing jewel for all equestian and hikers in the greater Bay Area and beyond. With the growth of cycling and Mt. Biking, it has become tricky to find trails that one can ride without the continued vigilance of coming upon a bikers flying through the forest. We are so blessed to have an abundance of open space in our area, and there certainly is plenty of room for all of us here in Marin County. However, Pt. Reyes National Seashore has been a sacred space that is free from bikes and can really accommodate horses traveling long distances. Personally, I have given up trying to ride horses anywhere on Mt. Tam, or in Southern Marin. Let the cyclist have that, at least we can ride in Pt. Reyes. Please keep this as a bike free zone and let hikers and horse have one place without concern. Thank you.

#437

Name: Wren, Carrie

Correspondence: I have been an avid horseback rider most of my life. My older sister had me on her horse when I was in diapers. I was given my first horse on my 10th birthday and have been trail riding ever since. My favorite trails are at Pt. Reyes. I horse camped there usually twice a month when Stewart's Camp was open and came over for day rides during the winter months.

All that has changed as of one and a half years ago. I was walking up a narrow trail in Skyline Park (Napa). A bicyclist was stopped 100 feet above us. We stopped and both my friend and I began yelling "hello!", and other pleasantries to get the bicyclist to look up and see us on the narrow trail. Suddenly he began peddling towards us, all the time looking at the ground beneath him. I was in front and was afraid he would run into my horse so I gently moved him off the trail. Because the bike came speeding in our direction my horse started bucking. Around the 4th buck I was launched in the air and came down on my hip and rolled several times down the hill. A year and a half later I am still in pain; both my hip and lower back. By the way, the bicyclist stopped 4 feet from the horse that was behind me. Since then I have been too afraid and sore to get back on my horse.

Yes, in theory it would be nice if hikers, bikers and horses could share the trails. But the facts are that horses are fight or flight animals that are strong and weigh an average of 1,200 pounds. Squealing brakes or fast approaching bikes (especially from behind) can cause a horse to panick, buck, rear, run off or worse head off the hillside. As I have witnessed on many occasions, bicyclist enjoy speeding down a hill.

Horses & hikers are a natural good blend. Bicyclists have nearly mowed down hikers as well.

My point is, it is too dangerous to allow bicyclists on the same trails as hikers and horses

PLEASE KEEP US ALL SAFE.

#438

Name: N/A, N/A

Correspondence: I support the project to extend the Cross Marin Trail-through Samuel P. Taylor State Park-to Point Reyes Station and expand mountain and gravel biking access on Pt Reyes National Seashore trails and pastoral ranch roads.

#439

Name: violich, julia

Correspondence: Thank you for allowing the public to comment on access in the National Park. I am a 50 year old woman with 2 sons, 12 & 16. We ride on the weekends and love our family time in the outdoors together. I understand from others that mountain bikers now represent over 40% of the trail users in the county.

Unfortunately, when in the Point Reyes Seashore and on GGNRA public lands we can not bike, only hike. We also love hiking, but biking allows us to cover more miles and really get outside the typical 1-2 hour hiking loop. We would to have the National Parks look seriously at connectivity gaps and loop opportunities for mountain biking, especially for young riders that are constantly "pulled" toward the screen with so many mindless opportunities on their phones. We are more than willing to share trails with other user groups and have no problem at all stopping or dismounting when hikers are present on the trails. We have only had one incident when a hiker has been surprised by our presence. Every other times, we are compatible with other user groups.

Our wish list: Bike access to ranch roads in the pastoral zone that are already open to hikers.

A newly designed trail between Platform Bridge and Devils Gulch and Platform Bridge. I understand there are ranches that could accommodate a trail.

Redesign of the social trails off Bolinas Ridge for better connectivity and a single-track trail experience.

A trail to extend the Cross Marin Trail into Point Reyes

Lengthen the current Olema Valley Trail to Bolinas on the east side of Highway 1.

Thank you for your consideration

#440

Name: NUNEZ, KIMBERLY

Correspondence: PLEASE SAVE THE PT REYES TRAILS FOR FOOT USE AND EQUESTRIAN RIDING ONLY. WE ENJOY THE QUIET SERENITY OF THE PRESERVED LAND AND DO NOT WISH TO BE PUT IN DANGER BY SPEEDING, UNFRIENDLY BICYCLISTS. THEY HAVE OVER 75% OF THE TRAILS AND I WOULD LIKE TO BE ABLE TO FEEL SAFE IN SOME OF THE FEW PLACES LEFT. THANK YOU ,

KIM NUNEZ

#441

Name: Bryars, Raymond

Correspondence: I have been a recreational hiker for many years and enjoy the peace and tranquility of hiking many trails in CA. I am extremely concerned that if more trails are opened up to bike riders, I will no longer be able to relax when I take my grandchildren out to enjoy nature. I'm told that 75% of trails are already open to bike riding. Please allow seniors and children to be safe on the remaining trails. Unfortunately not all bike riders are careful. I have had a number of bad experiences where I've had to jump out of the way of aggressive bike riders. I would like to know that the trail I'm walking on is safe from speeding bikes.

Many thanks Ray Bryars

#442

Name: N/A, N/A

Correspondence: Hello Park Planners, Everybody loves Point Reyes. It's got a little bit of so many environments. I've been there many times over the last 40 years, as a hiker and an equestrian. My best memories are that it's wild, quiet and peaceful. Allowing bikes in the park will change all that. First the ambiance.... Hikers and equestrians would have to keep on the lookout for bikers at all times (kinda hard to relax!) Also, safety...I've been riding horses past bikes on trails often. Usually everything goes ok but sometimes it gets dicey. I've been all over that park and can think of a number of trails where if a bike and horse met it could get dicey real fast. It doesn't have to be that either user is breaking a Park rule either, it's just the nature of the trails. I've seen bike/horse accidents and I've been in a pretty bad one myself. It was nobody's fault.

Please consider the negative impact bikes would bring to this unique park.

#443

Name: gilseth, denise

Correspondence: I strongly oppose bikes in pt reyes national park. Hikers and equestrians have managed to keep the trails safe and well traveled without damage to the lands. Equestrians and hikers appreciate the slow pace of a walk in the woods, the silence, free of fast bikes, cars and the noise of civilization. Allowing bikes will take away that peaceful walk in the woods. Bikers are speed junkies, looking for that adrenalin rush of a fast paced ride down a rough country trail. They do not need another park for this type of biking. Leave the hikers and equestrians this last jewel and a* peaceful* place to enjoy the outdoors.

#444

Name: Bisharat, Leslie

Correspondence: I am writing in opposition to the expansion of trails that allow mountain biking in the Pt Reyes National Seashore. I am an avid hiker and backpacker and have encountered large numbers of mountain bikers on the park trails. I am very concerned that a significant increase in bike use and the possibility of organized events occurring will create trail conflicts, trail degradation and damage the tranquility that I and so many others treasure in the park. Mountain bikers already have access to a huge percentage of park trails. Do they really need more...or just want more?

#445

Name: N/A, N/A

Correspondence: This comment concerns the Pt Reyes area in California as well as other National Park areas throughout the United States. Bicyclists are petitioning and voicing for more and more access within these areas. I oppose any further access by this user group within these areas for the following reasons: as an equestrian for many years I can state that horses and bicyclists are not a good mix together on trails nor are bicyclists and hikers. Bicyclists move along faster than horses and hikers and because of this their field of view tends to have them looking down and not looking ahead for obstacles (ie: horses and hikers) and this is when accidents and confrontations happen. Also you can contact the U.S. Forest Service and find out what issues they are having with this user group compared to the other groups. Thank You.

#446

Name: soto, james

Correspondence: Dear NPS I start riding the trail at Point Reyes in 1975. They are beautiful trails for equestrian riders and horses.

Having bicycle riders on these trails is too dangerous. The bicycle riders come up behind the horse at a rapid speed and scare the horse, off goes the rider with multiple injuries. Thank you Don Soto

#447

Name: Bushey, Theresa

Correspondence: Please reserve the trails to horses only. Thank you Theresa

#448

Name: Napolitano, Chris

Correspondence: I believe it is perfectly reasonable to add biking trails and allow bicycles in all the areas described by the Marin Bicycle Coalition.

#449

Name: Brady, Nessa

Correspondence: I have been a biker and property tax payer in Marin for twenty years and as I've watched the number of car related bike accidents increase I think we as a county have a responsibility to create more safe off road biking options. All of these proposals just make sense so please consider moving forward to keep our residents safe and increase access to public lands.

- 1.) A new trail between Devil's Gulch and Platform Bridge through the Cheda, McIsaac, and Zanardi Ranches.
- 2.) A plan to connect the Cross Marin Trail into Point Reyes.

- 3.) Adoption of social trails off Bolinas Ridge for better connectivity and a single-track trail experience.
- 4.) Extend the Olema Valley Trail to Bolinas on the east side of Highway 1.
- 5.) Close gaps for bikes through ranch lands in the park, including closing the Estero Trail loop, connecting Sir Francis Drake Blvd. with Pierce Point Road, and connecting Marshall Beach to Pierce Point Road,
- 6.) A more bike-friendly permit application process for road and mountain bike events in the park, including along Bolinas Ridge and out to the lighthouse.
- 7.) Bike access to all ranch roads in the pastoral zone that are already open to pedestrians.

#450

Name: Clarke, Linda

Correspondence: The Pt. Reyes Trails wilderness trails should not be opened to mountain bikes. They already have access to trails and wilderness trails need to be wilderness.

#451

Name: Ramensky , Lee

Correspondence: Mountain bikes are a disaster for the peaceful beauty of Point Reyes. Please keep our national treasure free of frenzied, reckless, thrill seekers.

#452

Name: Swett, Philip

Correspondence: Thank you for the opportunity to comment. Access4Bikes represents approximately 3000 local mountain bike enthusiasts. Mountain biking has grown much in popularity and now represents your second largest user group at around 40%. Unfortunately new mountain bike opportunities in Point Reyes Seashore and on GGNRA lands has been absent. It is time to review current connectivity gaps and loop opportunities for mountain biking. All improvements for mountain biking can also be shared with hikers and the two uses are very compatible. Also note that Access4Bikes can organize volunteer days to offset the financial burden of trail development/improvement. We are ready to help! Here are the access improvements we are interested in seeing developed:

A new trail between Devils Gulch and Platform Bridge through the Cheda, McIsaac, and Zanardi Ranches.

A plan to connect the Cross Marin Trail into Point Reyes.

Adoption of social trails off Bolinas Ridge for better connectivity and a single-track trail experience.

Extend the Olema Valley Trail to Bolinas on the east side of Highway 1.

Close gaps for bikes through ranch lands in the park, including closing the Estero Trail loop, connecting Sir Francis Drake Blvd. with Pierce Point Road, and connecting Marshall Beach to Pierce Point Road,

A more bike-friendly permit application process for road and mountain bike events in the park, including along Bolinas Ridge and out to the lighthouse.

Bike access to all ranch roads in the pastoral zone that are already open to pedestrians.

Again, thank you for the opportunity to comment.

Philip Swett

#453

Name: Holbrook III, James

Correspondence: Test

#454

Name: Derevan, Richard

Correspondence: Point Reyes National Seashore is a really nice spot, but it could be remarkable for the American public. How? Instead of expanding private inholdings and their uses and extending leases, eliminate them. I picture a Point Reyes without ranches, domestic animals, and barbed wire fences everywhere one looks. Focus on protecting and expanding the park and enhancing the visitor experience by keeping the park wild.

#455

Name: N/A, Linda

Correspondence: Please keep the Point Reyes trails open only to hikers not bikes. Bikes have taken over many areas that were a solice and haven to hikers and/or equestrians. Let's have some sacred space to leisurely hike and wander aimlessly with nature. Bikes create unwelcome stress not only on others who share the trail and on the environment. The need for bikes to pull off trail to let others pass creates erosion & stress on undisturbed areas next to trail paths.

#456

Name: Valera, Susan

Correspondence: I am writing to express my disapproval of allowing bicycles in the Pt Reyes National Seashore. It is one of the few places that I am able to ride my horses without the concern of what is coming around the corner As I am avid horseman and trail rider and a native Sonoma County, I have ridden 95% of the parks in Marin and Sonoma.... For many years I was a member of the Sonoma County Mounted Patrol, my experiences with bicycles were not favorable. In cases they were traveling too fast for the terrain not aware of what was around the corner. On Many rides I encountered the bicyclists flying down hill or worse going off trail. They showed no consideration to hikers or equestrians. They were often rude and inconsiderate. I suggest that you contact the rangers at Trione-Annabel State Park to confirm the damage that has been done by bicyclists over the past 30 years.. it got so bad that I have stopped riding at that park. The bicyclists have multiple trails and place to ride in Marin County.. Pt Reyes need to stay as it with the trails open to hikers and equestrians.

#457

Name: N/A, N/A

Correspondence: please reject any plan to reduce the number of elk. ranchers on subsidized property can afford to allow a few wild animals onto the land. wild elk support the overall environment. please allow them to thrive.

#458

Name: Rader, Pamela

Correspondence: Please keep the bicycles off the Point Reyes horse trails. As a victim of a terrible accident involving bicycles and their failure to share the trails, I don't want to ride in fear of being injuriered again. I have ridden theses trails for over 30 years and want to keep them safe, for horseriders and hikers.Keep the bicycles off the Point Reyes horse trails. Thank you

#459

Name: Holbrook , James

Correspondence: I would like to begin my comment by trying to explain the joy horse trail riding in the incredible beauty of Pt. Reyes has afforded me over the last 28 years. There is something unique and very special about climbing aboard a well trained trail horse riding down a safe trail in a beautiful ancient tree forest. First, I notice, as time passes as I proceed down the trail, I can feel my entire body relax. My horse is quiet and doing all the hard work. I can hear all the sounds of the forest. I am free to observe the sights of the trail. I can see the beauty of the backlit leaves bringing iridescent images of light filtering through the trees. It is as though the peace and tranquility of the forest gently seeps into my body, mind and soul. I feel all the negative buzz of the electronic world I usually inhabit disappear. I come away from the experience renewed and calm, my tranquility and patience reserves are restored. I believe I am a better husband, father, and grandfather as a result of these horse camping experiences. Having the opportunity to ride and explore these single track trails without fear of running into loose dogs or mountain bikers has been a huge part of this wonderful experience. It has been my experience that once mountain bikes are allowed access to single track trails, they take over the trails and push the equestrians off the trail. Pt Reyes single track trails do not have the width or sufficient sight lines for safe multi-use trails. It is my understanding that the mountain bikes already have full access to over 75% of the Marin county trails. In the interest of preserving a unique trail riding experience for future generations which will bring healing to our urban area inhabitants, I beg you to leave Pt. Reyes parks trails as they are.

#460

Name: McDermott, Tracy

Correspondence: To allow bicycles on Pt. Reyes trails is the same as allowing cars on the sidewalks. The bicycle coalition has proven they respect no rules, walk any no bike trail and you will see their tracks. The bicycle enthusiasts have 2 faces, one for those who follow rules and are courteous to others as we all go about our pursuit of happiness but the other face is the eternal youth ego who feel they can and will do what they want, go wherever they want, interrupt others enjoyment sometimes in very dangerous ways, the mindset is to apologize if caught, blame others for the rules, speed, 'shred', ride not on trails but across pristine and ruin such a perfect environment for a personal thrill. Please keep in mind when you contemplate this situation. Your decision should and must be made with everyone included not just appeasement of the loudest and most untrustworthy, remember that the bicyclists disregard all the present rules why would they bother to follow new ones.

#461

Name: Kneeland, Leslie

Correspondence: I was horrified to hear that there is a chance that the beautiful , natural trails at Point Reyes could be ruined with bicycle riders! Are you kidding me??. This is the only totally natural place left you can go for a relaxed hike without constantly having to look over your shoulder for bikes whizzing up behind you!! Don't destroy this peaceful, quiet , wonderful experience with the hectic traffic of bicycles!! Please!! They already have EVERYWHERE ELSE. Leave us one special, natural, place. Legs not wheels!

#462

Name: N/A, Kim

Correspondence: The coalition of bikes is trying to gain access to land that should remain as is. Bikes currently have access to well over 70% of public trails in and around Marin County. There needs to be areas that are kept specifically for equestrian/hiking or just hiking. We need to keep these areas free from wheeled vehicles. The amount of trails that bikes have access to is huge and they seem to always want more. Let's leave some trails/areas as is so hikers can enjoy a few areas where they don't have to worry about a fast moving bike coming at them from around the bend.

#463

Name: Klein, Joel

Correspondence: I'm writing as a cyclist and Marin County Bicycle Coalition member in support of MCBCs goals of adding additional cycling opportunities in Point Reyes' non-Wilderness areas, specifically:

A new trail between Devil's Gulch and Platform Bridge through the Cheda, McIsaac, and Zanardi Ranches.

A plan to connect the Cross Marin Trail into Point Reyes.

Adoption of social trails off Bolinas Ridge for better connectivity and a single-track trail experience.

Extend the Olema Valley Trail to Bolinas on the east side of Highway 1.

Close gaps for bikes through ranch lands in the park, including closing the Estero Trail loop, connecting Sir Francis Drake Blvd. with Pierce Point Road, and connecting Marshall Beach to Pierce Point Road,

A more bike-friendly permit application process for road and mountain bike events in the park, including along Bolinas Ridge and out to the lighthouse.

Bike access to all ranch roads in the pastoral zone that are already open to pedestrians.

Bicycling is not incompatible with other park uses, and bicyclists are a large and important demographic of park & open space users.

-Joel Klein

#464

Name: Garner, Kelly

Correspondence: I have been hiking and horseback riding for over 50 years in the Pt Reyes national seashore. Giving bikes access to the trails would be very dangerous for pedestrians and equestrians. Bikes have access to all roads and are taking over most of our trails. The damages to the trails will impact us all. Please consider the future of this wrong decision to let the bikes in on National parks, stay strong, vote NO! Kelly Garner/ Avid Equestrian.

#465

Name: Ortiz, Ginger

Correspondence: I've been hiking and riding horses in point Reyes national seashore for over 50 years. I oppose adding more single track trails that are open to mountain bikers, as it creates dangerous situations for both equestrians and hikers.

#466

Name: Schroeder, Tina

Correspondence: Please don't allow access to bikers, they have enough, I can't tell you how many times I've had bikers run into or barely miss my horse. Pt Reyes is the one of the few places where we can safely ride and enjoy the scenery.

#467

Name: Corder, Anne

Correspondence: Please keep bicycles off of the trails in Pt. Reyes National Park. Bicycles in wilderness areas detract from the relaxing atmosphere that I am looking forward to when spending time out of doors. Thank you

#468

Name: Stanley, Christopher

Correspondence: I am writing to express my support for MCBC (Marin County Bicycle Coalitions) ideas for opening up more trails to a significantly large user group...mountain bikers. Here are some of the initiatives of MCBC that I support.

A new trail between Devil's Gulch and Platform Bridge through the Cheda, McIsaac, and Zanardi Ranches.

A plan to connect the Cross Marin Trail into Point Reyes.

Adoption of social trails off Bolinas Ridge for better connectivity and a single-track trail experience.

Extend the Olema Valley Trail to Bolinas on the east side of Highway 1.

Close gaps for bikes through ranch lands in the park, including closing the Estero Trail loop, connecting Sir Francis Drake Blvd. with Pierce Point Road, and connecting Marshall Beach to Pierce Point Road,

A more bike-friendly permit application process for road and mountain bike events in the park, including along Bolinas Ridge and out to the lighthouse.

Bike access to all ranch roads in the pastoral zone that are already open to pedestrians.

Thank you Chris

#469

Name: N/A, N/A

Correspondence: Hello, as a horse owner who travels all over the western states to ride the trails I am asking to PLEASE not allow bikes on the trails at Point Reyes. I have ridden there and it is so beautiful and unspoiled. To allow bikes on these trails would not only be ruining this tranquil area but it would also cause the same problem that happens when bikes have been allowed on other horse trails - NOT ALL BIKE RIDERS FOLLOW THE RULES AND THE FEW THAT DO NOT RUIN IT FOR EVERYBODY. it happens EVERY time I ride on a multi use trail. Most of the bike riders are very nice and courteous and yield to the horses but there is ALWAYS somebody on their bike that does NOT. It isn't a matter of IF a person or horse gets hurt it is a matter of WHEN a person or horse gets hurt because of these inconsiderate bike riders. Since there is no way of knowing who these people are that make the trails dangerous, it is just better to play it safe and NOT allow bikes on these trails at all.

#470

Name: Hoge, Emily

Correspondence: Please keep our wilderness free from speeding bikes. Let us have one peaceful refuge from the anxiety of being run off the trail. The bike coalitions are organized and powerful but represent a minority that other users have trouble fighting. Please let us hike and ride in an environment that is free from mechanised recreation.

#471

Name: N/A, Lynn

Correspondence: Yesterday my husband and I were walking a mixed use trail in the Marin Headlands. At one point 3 bikes were coming towards us, all at top speed. And just before the 3 bikes reached us, 2 bikes came up from behind, and without warning suddenly passed us. We were sent off the side of the trail or would have been hit. What a tragedy Marin Headlands have become. Bikes whizzing by, many with music blasting, they do not slow for hikers or equestrians. The bike lobby is so powerful and large - they inundate town councils and the NPS with comments urging more access. But what about the real goals of the park - to protect these vulnerable lands for generations to come.

Pt Reyes is the last pristine park. Please protect it from more bicycle use.

#472

Name: Jennings, Cris

Correspondence: As a frequent visitor to this area, I value the peace and quiet of a walking path to enjoy the serene beauty. I am also an avid cyclist but some areas are NOT appropriate for cycling as this activity ruins the wilderness experience for all other users. Keep wilderness area off limits to bikes.

#473

Name: Adams, Laura

Correspondence: I strongly urge the National Park Service to NOT open more trails in Point Reyes National Seashore to bicycle riders. This is the only park I feel safe to ride my horse in because bike riders are not allowed. I used to ride in Trione-Annadelle State Park, but because of the many dangerous encounters I have had with the bicyclists, I will not ride there anymore. Additionally, they are damaging that park with illegal trails that they have started. People who hike and ride horseback in Trione-Annadelle Park have frequent complaints about the bicycle riders. I have even had potentially dangerous encounters with bike riders on Bear Valley Trail and Stewarts where they rode up behind my horse without slowing or letting me know they were there and then were rude when asked politely to slow down. The majority of bicycle riders obey the rules and are polite, it is the few that make it dangerous. I haul my horse from Sonoma County to enjoy the peace, tranquility, and wildlife at Point Reyes. I cannot imagine what it will become if bicycle riders are allowed more access. There are plenty of other parks in Marin County where they can ride. Please do not allow additional access to the bicycle riders.

#474

Name: Hamel, Joy

Correspondence: please no bike in pt reyes. no bikes on NPS land! equestrians and bikes do not mix! our last peaceful place to ride is on NOS land, specifically Pt Reyes

#475

Name: Ehm, Charles

Correspondence: Please expand the bike trails within the Pt Reyes park. Our family loves to explore these trails, bike camp over at Wildcat, and would love for the opportunity to have more adventures. Thank you.

#476

Name: Parkinson, Dorian

Correspondence: I both ride and mountain bike. I do not ride my horses in Pt Reyes nor do I mountain bike there. I cherish Pt. Reyes as one of the few places left to hike/enjoy a wilderness area on foot, making the least amount of impact possible. Expanding bike access will ruin this area.

#477

Name: Dionne, Leonor

Correspondence: AS a hiker and an equestrian I so appreciate that Stewart Ranch is a quiet and safe trail where hikers and horse back riders can put there worries and stress of the city behind them an just focus on the natural beauty, solitude and peacefulness of the environment without he concern of having to be ever vigilant for those mountain bikers speeding down the trail spooking hikers and riders. CAn we not leave this area as a hiker and Equestrain trail as is for the safety of it current users? Please keep Stewart Ranch a hiker and equestrian safe.

Thank you. Leonor Dionne

#478

Name: herbert, Lisa

Correspondence: Hello, I am writting to express my opposition to the park allowing bikes on even more trails, which are now safe for hikers and Equestrians. The safety conditions of these trails will only suffer and people and horses will get hurt. Thank you, Lisa Herbert

#479

Name: Bonelli, Toni

Correspondence: I have hiked, camped, biked and ridden horses at Pt. Reyes for over 20 years. As a hiker, I enjoy the trails that are limited to pedestrians. As a horse woman, I enjoy the trails that are limited to pedestrians and horses. And as a biker, the same. There are sound ecological and safety reasons the trails are used. We need to respect that, and discontinue the modern, selfish thoughts that "it's all mine." There is no one sport that should over ride the safety of others, nor the common enjoyment of our natural resources. If you want access to a particular portion of the park - access it the manner allowed: get off your bike, don't bring your horse and walk it. We don't need to expand access.

#480

Name: S, Melanie

Correspondence: Please deny bicycle access for the Pt. Reyes trails that are solely for hikers & equestrians or that restrict access to all. I recently rode my horse at Skyline Wilderness Park in Napa. Bikes are allowed on pretty much all of those trails & they're flooded with them. They zoom along single track trails with not a thought of approaching horses or hikers. I won't be going back to ride there, as a result. Most of the bikers were pretty respectful but in Marin County, that's usually not been the case. The bikers I've come across on horseback have been aggressive and unyielding. I don't want anyone to get hurt. I don't complain about the trails I'm not allowed access on as an equestrian and it just seems pretty selfish & greedy to me. Not to mention the impact on the wildlife, that will absolutely be affected when multitudes of bikers suddenly flood trails. Please keep Pt. Reyes the beautiful outdoors experience it has been for ALL to enjoy & experience. The bikers greatly affect and impact the experience negatively. Please also understand that it's also a huge safety issue and accidents will absolutely occur as a result of opening bike access to restricted trails. Thank you so much!

#481

Name: N/A, N/A

Correspondence: Regarding expanding mountain biking at Point Reyes National Seashore..

As a hiker and equestrian, I so appreciate the solitude, safety and relaxation that bike-excluded trails afford. The mountain bike community always pushes hard to ever expand trail access. They seem to think that other user groups don't exist and are in the way. As someone who frequently uses narrow single track trails in an area with ever increasing user conflicts, I hope you consider the wishes of those who value a trail system without the worry of bike users who fly down the trail and risk other recreationists' safety. I'm told that bikes are authorized on 70% of Pt. Reyes trails. There should be places they are excluded.

Thank you for your time.

#482

Name: sassoon, joy

Correspondence: Since the ranch roads and some paths were already there, Wilderness destination isn't really what it is .. not that it's the main focus. I have been mountain biking for many years and am now in my 60's. The Point Reyes Ntl. park would be a wonderful place for us to be included especially where a large horse is allowed. It seems like politics and elitists have taken the power to exclude us in the 11th hour when we were written out of the law to be there. I have gone to other counties, states and countries where everyone gets along well. There can be info kiosks to inform right of way, nature alerts, etc. We are also the largest user group for outdoor recreation/sports. Bikes get us further. we are good at guiding lost people, getting help, and most of us are really friendly and considerate. this needs to be seen as a real "Thing". We also advocate and volunteer. Thank you.

#483

Name: Tregaskis, Wade

Correspondence: I support 'Alternative F' - with responsible implementation to ensure the livelihoods currently tied to agriculture within Point Reyes are given reasonable time & opportunity to adapt or move off of park lands. Point Reyes is beautiful & full of life, but can be even more-so if returned to its true, natural state.

It's disappointing that agricultural use has persisted to this day, in a so-called National Park. We, as humans, have already claimed most of the natural world for our own agriculture - National Parks are supposed to be a last bastion against that destruction.

#484

Name: Boisson, Edward

Correspondence: I support the Marin County Bicycle Coalition priorities to expand bicycle access in Point Reyes:

1. A new trail between Devil's Gulch and Platform Bridge through the Cheda, McIsaac, and Zanardi Ranches.
2. A plan to connect the Cross Marin Trail into Point Reyes.
3. Adoption of social trails off Bolinas Ridge for better connectivity and a single-track trail experience.
4. Extend the Olema Valley Trail to Bolinas on the east side of Highway 1.
5. Close gaps for bikes through ranch lands in the park, including closing the Estero Trail loop, connecting Sir Francis Drake Blvd. with Pierce Point Road, and connecting Marshall Beach to Pierce Point Road,
6. A more bike-friendly permit application process for road and mountain bike events in the park, including along Bolinas Ridge and out to the lighthouse.
7. Bike access to all ranch roads in the pastoral zone that are already open to pedestrians.

Thank you! Ed Boisson

#485

Name: Hudgins, Cheryl

Correspondence: Point Reyes is a special place that has areas that when riding a horse it could be dangerous with bikes flying down hills and around cliffy corners. This could be life threatening and bikes should not have access to these trails. Also bike tires rut out trails in a way that would really break them down. Please no bikes in there, they should be preserved in a way that bikers could make them very dangerous. Thanks for your consideration.

#486

Name: Williams, Stephanie

Correspondence: We used to live in Sonoma County, now reside in Placer County and continue to be avid equestrians and hikers who have enjoyed Pt. Reyes trails for over 40 years. As you probably know, the sport of mountain bike racing has made it increasingly difficult for hikers, runners and horseback riders to find safe and peaceful places for outdoor activities. Terrible accidents which have resulted from mtn bikes hitting horse riders, hikers and other mtn. bikers are now well-documented. Please keep the precious non-bicycling trails in Pt. Reyes protected from mtn. bikes. Sincerely, Stephanie Williams

#487

Name: Milum, Jeffrey

Correspondence: Mountain biking has grown much in popularity and now represents your second largest user group at around 40%. Unfortunately new mountain bike opportunities in Point Reyes Seashore and on GGNRA lands has been absent, and existing opportunities (besides roads dirt roads) is limited to one or two trails. This discrimination towards a single tax payer segment is disappointing at best and I urge you to implement a more fair strategy.

In order to keep mountain bikers safe from speeding and sometimes hostile auto drivers, please review current connectivity gaps and loop opportunities for mountain biking. All improvements for mountain biking can also be shared with hikers and the two uses are very compatible. Mountain bikers are well known for being the ONLY user group who will actually participate in trail building and maintenance, so financial resources can be conserved as well.

Here are the access improvements that I understand should be considered:

A new trail between Devils Gulch and Platform Bridge through the Cheda, McIsaac, and Zanardi Ranches.

A plan to connect the Cross Marin Trail into Point Reyes.

Adoption of social trails off Bolinas Ridge for better connectivity and a single-track trail experience.

Extend the Olema Valley Trail to Bolinas on the east side of Highway 1.

Close gaps for bikes through ranch lands in the park, including closing the Estero Trail loop, connecting Sir Francis Drake Blvd. with Pierce Point Road, and connecting Marshall Beach to Pierce Point Road,

A more bike-friendly permit application process for road and mountain bike events in the park, including along Bolinas Ridge and out to the lighthouse.

Bike access to all ranch roads in the pastoral zone that are already open to pedestrians. It is only fair!

Thank you,

Jeff Milum

#488

Name: Nettleton, Mike

Correspondence: Thank you for opening up this comment period.

As an avid mountain biker and also a conservationist, I have studied the effects of mountain biking on the environment and by nearly every measure, mountain biking has no greater footprint on the land than hiking and in many cases significantly less than equestrian use. Yet biking is largely excluded from GGNRA/NPS on singletrack.

Mountain bikers are the fastest growing demographic of trail users in Marin and we already represent somewhere in the range of 30-40% of current users. Yet our access to singletrack trails is disproportionately low at around 12-15% of singletrack in Marin (with nearly half that total on private land at Camp Tamarancho.)

Fireroad access is often touted as good enough for bikers by groups that do not wish to share the trails. Inherent in that stance is an understanding that singletrack is preferable for almost every user due to it's more scenic, challenging and immersive qualities. We are seeking more access to these experiences on our public lands. With that in mind, following are areas where access within GGNRA/NPS lands could be improved:

A new trail between Devils Gulch and Platform Bridge through the Cheda, McIsaac, and Zanardi Ranches.

A plan to connect the Cross Marin Trail into Point Reyes.

Adoption of social trails off Bolinas Ridge for better connectivity and a single-track trail experience.

Extend the Olema Valley Trail to Bolinas on the east side of Highway 1.

Close gaps for bikes through ranch lands in the park, including closing the Estero Trail loop, connecting Sir Francis Drake Blvd. with Pierce Point Road, and connecting Marshall Beach to Pierce Point Road,

A more bike-friendly permit application process for road and mountain bike events in the park, including along Bolinas Ridge and out to the lighthouse.

Bike access to all ranch roads in the pastoral zone that are already open to pedestrians.

Thank you for taking these comments into consideration.

Regards,

Mike Nettleton

#489

Name: Kline, Sean

Correspondence: As an avid cyclist and advocate for prudent preservation of Marin's unique heritage, I'm writing to voice support for the following developments:

Creating a new trail between Devil's Gulch and Platform Bridge through the Cheda, McIsaac, and Zanardi Ranches.

Connecting the Cross Marin Trail into Point Reyes.

Adopting social trails off Bolinas Ridge for better connectivity and a single-track trail experience.

Extending the Olema Valley Trail to Bolinas on the east side of Highway 1.

Closing gaps for bikes through ranch lands in the park, including closing the Estero Trail loop, connecting Sir Francis Drake Blvd. with Pierce Point Road, and connecting Marshall Beach to Pierce Point Road,

Creating a more bike-friendly permit application process for road and mountain bike events in the park, including along Bolinas Ridge and out to the lighthouse.

Biking access to all ranch roads in the pastoral zone that are already open to pedestrians.

#490

Name: Rasmussen, Joan

Correspondence: I oppose allowing bicyclists on the trails at Pt. Reyes National Seashore. As an equestrian, I prefer riding at Pt Reyes for the specific reason that bicycles are not allowed on many of the trails. Riding (or hiking) in other parks where the bicycles are allowed has led to many unpleasant, dangerous, and often contentious encounters where cyclists are not obeying the rules. Most cyclists do follow the rules, but the ones who don't ruin the experience for everyone. The bicycles also do more damage to the trails, especially under wet or muddy conditions, than hikers or horses do as the tires are in constant contact with the trail surface.

I hate to oppose access to these beautiful trails to anyone, but the fact is, since trail biking has become so popular, it seems to bring out the worst in cyclists who often ignore the speed rules and the yielding etiquette, as well as common courtesy. Unless the staffing is available to effectively enforce the rules, I oppose letting cyclists on more trails that are also used by hikers and equestrians.

#491

Name: Zavestoski, Stephen

Correspondence: I would like to convey the importance of approving a new trail between Devils Gulch and Platform Bridge through the Cheda, McIsaac, and Zanardi Ranches for the following reasons:

Such a multi-use trail is 100% consistent with the goals of the NPS. A connector from the Cross Marin Trail into Point Reyes will make non-motorized access to the National Seashore even easier, reducing the need to emit greenhouse gases in order to make use of public lands.

For these same reasons, I also support adopting social trails off Bolinas Ridge and extending the Olema Valley Trail to Bolinas on the east side of Highway 1. Finally, there are existing gaps in the bike-legal network that make utilizing a bicycle for the purposes of enjoying the National Seashore problematic. Completing the Estero Trail loop, connecting Sir Francis Drake Blvd. with Pierce Point Road, and connecting Marshall Beach to Pierce Point Road, will make major improvements to the bike-ability of the park.

Finally, as a member of the San Francisco Randonneurs, which regularly holds bicycling events in the park, I would like to advocate a more bike-friendly permit application process for bike events in the park.

Thank you.

#492

Name: N/A, N/A

Correspondence: Point Reyes should be protected for everyone. Vehicles, bikes, quads all make ruts that allow rain water to run off and create damage to the trails. Please protect what is left from this type of damage. We are not limiting anyone's access to the area only their method of access. And in the process protecting the environment for everyone.

#493

Name: Shopbell, Phyllis

Correspondence: It would be a BIG MISTAKE to allow bikes to use trails at PT. REYES NATIONAL PARKS.

To Preserve the safety of hikers and equestrians, and integrity of the trails, DO NOT ALLOW BIKES on the trails.

#494

Name: Bowles, Brad

Correspondence: I support and would like bicycle access to the following areas in Point Reyes:

A new trail between Devil's Gulch and Platform Bridge through the Cheda, McIsaac, and Zanardi Ranches.

A plan to connect the Cross Marin Trail into Point Reyes.

Adoption of social trails off Bolinas Ridge for better connectivity and a single-track trail experience.

Extend the Olema Valley Trail to Bolinas on the east side of Highway 1.

Close gaps for bikes through ranch lands in the park, including closing the Estero Trail loop, connecting Sir Francis Drake Blvd. with Pierce Point Road, and connecting Marshall Beach to Pierce Point Road,

A more bike-friendly permit application process for road and mountain bike events in the park, including along Bolinas Ridge and out to the lighthouse.

Bike access to all ranch roads in the pastoral zone that are already open to pedestrians.

Thank you!

#495

Name: Bruun, Henriette

Correspondence: I am writing you in opposition of opening up the wilderness area of Pt Reyes National Seashore to bicycling. This area should NOT be expanded to allow bicycling opportunities.

As an equestrian and hiker I value the wilderness and natural quiet trails. It is important that this quiet hiking experience be maintained for the majority (foot folks), and that constantly looking over your shoulder for speeding bikes is not a good experience. The bikers already have 75% access to the Pt Reyes National Seashore and the rest must be preserved for wild life and unspoiled nature. Mountain bikers are in general very destructive to the landscape and carve out side trails with jumps and bank turns and do not stick to the main trails.

Please continue to limit the access to the Cross Marin Trail-through Samuel P. Taylor State Park-to Point Reyes Station, and do not allow expansion of mountain and gravel biking access on Pt Reyes National Seashore trails and pastoral ranch roads.

Sincerely

#496

Name: Barrett, Janine

Correspondence: Please do not allow cyclists more access to trails in Pt Reyes National Seashore. I am a cyclist, horse rider and runner and was just running out there yesterday thinking how glad I am bikes (and even horses on some trails) are not allowed. Many trails are really rutted already, I can't imagine what they would look like if bikes were permitted on these trails.

Pt Reyes is a national treasure and one of the closest "wilderness" areas to my home. Mechanized vehicles have no place beyond the fire roads.

#497

Name: N/A, N/A

Correspondence: Thank you for the opportunity to comment.

Unfortunately new mountain bike opportunities in Point Reyes Seashore and on GGNRA lands has been absent. It is time to review current connectivity gaps and loop opportunities for off road cycling. All improvements for mountain biking can also be shared with hikers and the two uses are very compatible.

Here are the access improvements I would be interested in seeing developed:

A new trail between Devils Gulch and Platform Bridge through the Cheda, McIsaac, and Zanardi Ranches.

A plan to connect the Cross Marin Trail into Point Reyes.

Adoption of social trails off Bolinas Ridge for better connectivity and a single-track trail experience.

Extend the Olema Valley Trail to Bolinas on the east side of Highway 1.

Close gaps for bikes through ranch lands in the park, including closing the Estero Trail loop, connecting Sir Francis Drake Blvd. with Pierce Point Road, and connecting Marshall Beach to Pierce Point Road,

A more bike-friendly permit application process for road and mountain bike events in the park, including along Bolinas Ridge and out to the lighthouse.

Bike access to all ranch roads in the pastoral zone that are already open to pedestrians.

Again, thank you for the opportunity to comment.

#498

Name: Schnell, Jody

Correspondence: National Park Service Representatives, Please, do not open up any more of the Pt Reyes wilderness lands to bikes. I am an equestrian who has been enjoying these lands for the past 20 years. I travel the entire state trail riding with my horses and this is by far my favorite place to ride. The serene beauty of these trails is unmatched. This all changes once bikes are introduced. Both the peace and safety of our rides decrease. Bikes already have access to 75% of Marin's trails. Pt Reyes is our only wilderness land and some of its trails are already off limits to horses. The entire ride experience is diminished when you constantly have to be on the lookout for bikes tearing up behind you or racing towards you. This area needs to be protected for equestrians and hikers. Please do NOT open it up to bikes. Sincerely, Jody L. Schnell Equestrian

#499

Name: McGrath, Tim

Correspondence: Please can you consider the following bicycle trails in Point Reyes?

A new trail between Devil's Gulch and Platform Bridge through the Cheda, McIsaac, and Zanardi Ranches.

A plan to connect the Cross Marin Trail into Point Reyes.

Adoption of social trails off Bolinas Ridge for better connectivity and a single-track trail experience.

Extend the Olema Valley Trail to Bolinas on the east side of Highway 1.

Close gaps for bikes through ranch lands in the park, including closing the Estero Trail loop, connecting Sir Francis Drake Blvd. with Pierce Point Road, and connecting Marshall Beach to Pierce Point Road,

A more bike-friendly permit application process for road and mountain bike events in the park, including along Bolinas Ridge and out to the lighthouse.

Bike access to all ranch roads in the pastoral zone that are already open to pedestrians.

Cheers Tim

#500

Name: Blanchard, Ross

Correspondence: I'm an avid mountain biker and I would like to see expanded access to trails in the Pt. Reyes seashore. Here are some suggestions:

A new trail between Devil's Gulch and Platform Bridge through Cheda, McIsaac and Zanardi Ranch.

A plan to connect the Cross Marin Trail into Point Reyes.

Adoption of social trails off Bolinas Ridge for better connectivity and a single-track trail experience.

Extend the Olema Valley Trail to Bolinas on the east side of Highway 1.

Close gaps for bikes through ranch lands in the park, including closing the Estero Trail loop, connecting Sir Francis Drake Blvd. with Pierce Point Road and connecting Marshall Beach to Pierce Point Road,

A more bike-friendly permit application process for road and mountain bike events in the park, including along Bolinas Ridge and out to the lighthouse.

Bike access to all ranch roads in the pastoral zone that are already open to pedestrians.

Thanks for listening.

- Ross

#501

Name: Horner, Mark

Correspondence: Leave Point Reyes trail system the way it is. We don't need more bike trails. Bikers have plenty of access now. I am an equestrian and Point Reyes is one of the best places on earth for horse back riding as it is now.

#502

Name: Campbell, Lin

Correspondence: Please preserve the trails while allowing continued equestrian trails that we currently have the privilege of riding. Thank you.

Lin

#503

Name: Dalton, Craig

Correspondence: Please open up the Pt. Reyes area to more mountain bike / gravel riding. This area is so beautiful and would be great for a special outing from time to time. Bikes, hikers and horse back riders peacefully co-exist all over the country and could do this same on this land.

Thanks for your consideration.

Craig Dalton

#504

Name: hoch, peter

Correspondence: Point Reyes National Seashore PRNS

It is with regret, that I find it necessary to write this letter. It has been brought to my attention that once again there are actions being contemplated by politicians that would thwart the will of the electorate with regards to what they thought was settled policy.

Legislation in place that was written leading to the formation of PRNS is under the threat of modification. The formation of PRNS made it quite clear, that over a time of decades, ranching at PRNS would be terminated. With the generous time line for this to occur, PRNS could reach it's full potential as a National Park.

Dairy operations and cattle raising are not inherent with what park visitors seek out. There are many locations in California that do a good job, in appropriate locations, where these enterprises thrive, PRNS is not one of them.

In closing I would like to implore you to make every effort to see to it that the Act that created PRNS be followed as it relates to ranching at PRNS.

Sincerely, Peter Hoch

#505

Name: N/A, N/A

Correspondence: NPS - In regards to mixing hikers, horses, and bicycles on the Point Reyes National Seashore trails I would like to comment that this combination will not work and for NPS to approve this would be outrageous in that hikers and horses are sure to be injured with bicycles racing and sliding down the dirt trails. Also, I would like to inquire as to who would take financial responsibility for the many injuries that are sure to occur if this plan is approved?

#506

Name: Summers, philip

Correspondence: I am writing you in opposition of opening up the wilderness area of Pt Reyes National Seashore to bicycling. This area should NOT be expanded to allow bicycling opportunities.

As an equestrian and hiker I value the wilderness and natural quiet trails. It is important that this quiet hiking experience be maintained for the majority (foot folks), and that constantly looking over your shoulder for speeding bikes is not a good experience. The bikers already have 75% access to the Pt Reyes National Seashore and the rest must be preserved for wild life and unspoiled nature. Mountain bikers are in general very destructive to the landscape and carve out side trails with jumps and bank turns and do not stick to the main trails.

Please continue to limit the access to the Cross Marin Trail-through Samuel P. Taylor State Park-to Point Reyes Station, and do not allow expansion of mountain and gravel biking access on Pt Reyes National Seashore trails and pastoral ranch roads

#507

Name: Panton, Marissa

Correspondence: Please reconsider removing the Tule elk from their habitat. The continued spread of cattle ranching will only harm the ecosystem more. Every species should be allowed to live freely in its natural environment. Humans cannot decide to eradicate all forms of life for simple palate pleasure. Will those in positions of power not be happy until we've destroyed all wildlife? The Earth is going to be a very sad, infertile, and ravaged place for all posterity to inherit.

#508

Name: N/A, James

Correspondence: As someone who has visited Point Reyes multiple times. I feel it would be a shame to degrade the quality of the wildlife viewing there in order to increase agriculture in the park, which shouldn't be there in the first place. While a big deal is made out of the agricultural jobs. There are a lot of tourism jobs that will be negatively impacted if new farming provisions cut down on the number of elk, birds, bobcats, badgers and coyotes in the park.

#509

Name: N/A, N/A

Correspondence: A new trail between Devil's Gulch and Platform Bridge through the Cheda, McIsaac, and Zanardi Ranches.

A plan to connect the Cross Marin Trail into Point Reyes.

Adoption of social trails off Bolinas Ridge for better connectivity and a single-track trail experience.

Extend the Olema Valley Trail to Bolinas on the east side of Highway 1.

Close gaps for bikes through ranch lands in the park, including closing the Estero Trail loop, connecting Sir Francis Drake Blvd. with Pierce Point Road, and connecting Marshall Beach to Pierce Point Road,

A more bike-friendly permit application process for road and mountain bike events in the park, including along Bolinas Ridge and out to the lighthouse.

Bike access to all ranch roads in the pastoral zone that are already open to pedestrians.

#510

Name: Hart, Dean

Correspondence: Keep ranching in Point Reyes. It provides working families jobs and much needed housing. Don't take anymore housing away from Wea St Marin without a offsetting plan to provide house or funding for housing in West Marin. It was short sited of Congress a generation ago to move families off the property and at the same time to not provide or fund for housing. It has further degrade out west Mari communities such as Bolinas where 20-30 residents lost housing

#511

Name: Murrin, Peggy

Correspondence: I don't believe allowing bikes in our national seashore is best for all concerned. It would creat a dangerous situation for hikers and equestrians. The cyclists have demonstrated a lack of respect on our county trail system adding an additional burden to park rangers to police them effectively. This creates a strain on an already thin crew with no funds for expansion to resolve the incidents.

#512

Name: Little, Anthony

Correspondence: Thank you for the opportunity to allow comments on this project. Having bicycle trail access through the Point Reyes National Seashore is something of dreams; a beautiful landscape that can make you feel totally at peace and in abundant solace. While my family and I have always enjoyed walking and hiking through the region, being able to visit the PRNS without having to drive, i.e., riding my bike from my home, would be ineffably ethereal.

As a Access4Bikes member, I too support their suggestions below.

- A new trail between Devils Gulch and Platform Bridge through the Cheda, McIsaac, and Zanardi Ranches.

- A plan to connect the Cross Marin Trail into Point Reyes.

- Adoption of social trails off Bolinas Ridge for better connectivity and a single-track trail experience.

- Extend the Olema Valley Trail to Bolinas on the east side of Highway 1.

- Close gaps for bikes through ranch lands in the park, including closing the Estero Trail loop, connecting Sir Francis Drake Blvd. with Pierce Point Road, and connecting Marshall Beach to Pierce Point Road,

- A more bike-friendly permit application process for road and mountain bike events in the park, including along Bolinas Ridge and out to the lighthouse.

- Bike access to all ranch roads in the pastoral zone that are already open to pedestrians.

Thank you for the opportunity to comment on the proposal and I look forward to future developments on this process.

Regards,

Michelle and Anthony Little

#513

Name: Mathias, John

Correspondence: Bicycle access needs to be improved in the park. In particular, off-road trails should be opened to bicyclists. There are many trail possibilities that would not interfere with hiking opportunities in the park. Bicycle touring/camping is growing in popularity, and the opening up of new trails would allow this low impact activity to be practiced in the park.

#514

Name: Williams, Douglas

Correspondence: Hi, I strongly support bike access to all trails!

#515

Name: Holbrook, Cheryl

Correspondence: I have been riding in Pt Reyes for 25 yrs, and it is the only place I ride where dogs and bikes are not allowed. The trails at Pt Reyes are not compatible with the term multi-use. They are narrow, , some drop offs, blind corners etc. The bikes already have plenty of other trails. It has also been my experience that the bike riders do not obey the speed limit and ride way too fast, making it unbelievably unsafe for everyone. I beg you not to allow bikes to use the Pt Reyes trails. Please keep it safe for equestrians and hikers.

#516

Name: Sherman, Linda

Correspondence: I would like to express an opinion concerning allowing bicycles on trails that are currently reserved for pedestrian and horses in and around Point Reyes. There is potential hazards when you combine the two. In most cases the bikes are traveling at a substantial rate of speed and may encounter hikers and horses on blind corners. This may result injury to the hiker, equestrian, equestrian rider and bicyclist. The beauty and peacefulness of the area should be maintained with its current policy, by allowing bicycles on designated trails and reserving a portion for the hiking and equestrian community. Thank you for your consideration, Linda Sherman

#517

Name: N/A, N/A

Correspondence: I am in support of the following 7 priorities

1. A new trail between Devil's Gulch and Platform Bridge through the Cheda, McIsaac, and Zanardi Ranches.
2. A plan to connect the Cross Marin Trail into Point Reyes.
3. Adoption of social trails off Bolinas Ridge for better connectivity and a single-track trail experience.
4. Extend the Olema Valley Trail to Bolinas on the east side of Highway 1.

5. Close gaps for bikes through ranch lands in the park, including closing the Estero Trail loop, connecting Sir Francis Drake Blvd. with Pierce Point Road, and connecting Marshall Beach to Pierce Point Road,
6. A more bike-friendly permit application process for road and mountain bike events in the park, including along Bolinas Ridge and out to the lighthouse.
7. Bike access to all ranch roads in the pastoral zone that are already open to pedestrians

#518

Name: Young, Matt

Correspondence: I am writing to support the potential expansion of trails for mountain biking. Access4 Bikes is a primary resource for my knowledge of this open comment period so I am echoing their comments. Thank you
Matt

Mountain biking has grown much in popularity and now represents your second largest user group at around 40%. Unfortunately new mountain bike opportunities in Point Reyes Seashore and on GGNRA lands has been absent. It is time to review current connectivity gaps and loop opportunities for mountain biking. All improvements for mountain biking can also be shared with hikers and the two uses are very compatible. Also note that Access4Bikes can organize volunteer days to offset the financial burden of trail development/improvement. We are ready to help! Here are the access improvements we are interested in seeing developed:

A new trail between Devils Gulch and Platform Bridge through the Cheda, McIsaac, and Zanardi Ranches.

A plan to connect the Cross Marin Trail into Point Reyes.

Adoption of social trails off Bolinas Ridge for better connectivity and a single-track trail experience.

Extend the Olema Valley Trail to Bolinas on the east side of Highway 1.

Close gaps for bikes through ranch lands in the park, including closing the Estero Trail loop, connecting Sir Francis Drake Blvd. with Pierce Point Road, and connecting Marshall Beach to Pierce Point Road,

A more bike-friendly permit application process for road and mountain bike events in the park, including along Bolinas Ridge and out to the lighthouse.

Bike access to all ranch roads in the pastoral zone that are already open to pedestrians.

#519

Name: Hasenauer, Jim

Correspondence: Thank you for considering my comments on planning for Pt. Reyes National Seashore. I'm a mountain bicyclist and there is much that NPS can do to make the park a more bicycle friendly space. Please consider:

1. A new trail between Devil's Gulch and Platform Bridge through the Cheda, McIsaac, and Zanardi Ranches.
2. A plan to connect the Cross Marin Trail into Point Reyes.
3. Adoption of social trails off Bolinas Ridge for better connectivity and a single-track trail experience.
4. Extend the Olema Valley Trail to Bolinas on the east side of Highway 1.

5. Close gaps for bikes through ranch lands in the park, including closing the Estero Trail loop, connecting Sir Francis Drake Blvd. with Pierce Point Road, and connecting Marshall Beach to Pierce Point Road,
6. A more bike-friendly permit application process for road and mountain bike events in the park, including along Bolinas Ridge and out to the lighthouse.
7. Bike access to all ranch roads in the pastoral zone that are already open to pedestrians.

Bicycling is a health promoting, sustainable, manageable recreation. While old NPS regulations have made it difficult for parks to allow bikes on some trails, this planning effort will allow the Seashore to develop a more visitor friendly, park friendly trail system. Thank you.

#520

Name: Lourenzo, Janet

Correspondence: Please give us a new trail between Devil's Gulch and Platform Bridge through the Cheda, McIsaac, and Zanardi Ranches.

A plan to connect the Cross Marin Trail into Point Reyes.

Adoption of social trails off Bolinas Ridge for better connectivity and a single-track trail experience.

Extend the Olema Valley Trail to Bolinas on the east side of Highway 1.

Close gaps for bikes through ranch lands in the park, including closing the Estero Trail loop, connecting Sir Francis Drake Blvd. with Pierce Point Road, and connecting Marshall Beach to Pierce Point Road,

A more bike-friendly permit application process for road and mountain bike events in the park, including along Bolinas Ridge and out to the lighthouse.

Bike access to all ranch roads in the pastoral zone that are already open to pedestrians.

These items are very important to our quality of life and most of all, get us off the road where the death toll continues to climb for bike riders.

#521

Name: Selig, Matt

Correspondence: Please consider adding and allowing mountain bike trails. There are so few trails in Marin county open to mountain bikers compared to hikers and equestrians. Please consider sharing your beautiful land with respectful and caring bikers who would appreciate it.

#522

Name: Murphy, Susie

Correspondence: I am submitting the comments below as an avid trail user both home and away. The responsible planning and well managed recreational use of this area will benefit all of your visitors. I am in full support of the Marin County Bicycle Coalition in their efforts as are the over 1000 SDMBA members that I represent.

Please consider:

A new trail between Devil's Gulch and Platform Bridge through the Cheda, McIsaac, and Zanardi Ranches.

A plan to connect the Cross Marin Trail into Point Reyes.

Adoption of social trails off Bolinas Ridge for better connectivity and a single-track trail experience.

Extend the Olema Valley Trail to Bolinas on the east side of Highway 1.

Close gaps for bikes through ranch lands in the park, including closing the Estero Trail loop, connecting Sir Francis Drake Blvd. with Pierce Point Road, and connecting Marshall Beach to Pierce Point Road,

A more bike-friendly permit application process for road and mountain bike events in the park, including along Bolinas Ridge and out to the lighthouse.

Bike access to all ranch roads in the pastoral zone that are already open to pedestrians.

Thank you for your thoughtful consideration of this matter.

Susie A. Murphy

#523

Name: N/A, N/A

Correspondence: I want to voice my support for additional on and off road bike access in Pt Reyes. In particular, a connection of the Cross Marin Trail to Pt Reyes Station would avoid harrowing road riding for many people.

#524

Name: Chaille, Tim

Correspondence: Regarding: BICYCLING ACCESS ON OUR PUBLIC LANDS IN PT. REYES NATIONAL SEASHORE

As a long time cyclist and advocate for fair use trail options I strongly support an increase in trail options for cyclist along the Point Reyes National Seashore. I stopped riding in Marin County a number of years ago because of limited number of acceptable trail options for cyclists along with increased hostility among other trail users. I have hiked many of the areas that are proposed areas for cyclist access and think there is a benefit to allowing such access to users who find in increasingly difficult to hike and are looking for a lower impact activity which still provides the opportunity to visit this beautiful area. Please consider allowing access as well as alternative trail options for those of us who would like to venture out into the beautiful area aboard our bicycles.

#525

Name: Wara, Michael

Correspondence: Dear National Park Service,

Thank you for beginning this process and for welcoming public input as you begin scoping a much needed update and amendment to the General Plan for Pt. Reyes National Seashore.

I have used the Seashore - and benefited tremendously from the resource - for the better part of 40 years. I grew up hiking and riding bikes on its many trails and have witnessed the evolution of the park through this time. I learned to ride a mountain bike on Olema Valley Trail and riding to Wildcat Beach from 5 Brooks in the 1980's. Today I ride horses their with my children and ride my road bike to Mt. Vision and the north beaches. My children attend sleep away summer camp in Pt. Reyes (awesome resource!!!). I live in Mill Valley and spend many weekends at a family home in Stinson Beach. We are profoundly grateful for all the park and its staff have done to improve and enrich our lives.

I write now to encourage greater consideration of bicycle users of the resource in the amendment process. My sense is that the last GMP was completed at a time when bicycle use of the park was much less - and really before the advent of mountain bikes as we now know them. Mountain and road bicycles are an important and valuable means of exploring and appreciating the incredible biological, ecological, and geological aspects of the park. But too often, their use has been limited by rules that seem arbitrary or simply established without consideration of this visitor population.

The GMP Amendment process is an important opportunity to reconsider decisions limiting or excluding the use of bicycles on trails where they would otherwise be appropriate. I urge you to do so. Bicycle traffic is not appropriate on all trails, but too often, trails that would allow for safe multi-use enjoyment are off limits in the park.

In particular, it would be great if the GMP process could include alternatives that incorporate a trail connecting Devil's Gulch and Platform Bridge; connection of the Cross-Marin Trail to Pt. Reyes; adoption of the social trails off of the Bolinas Ridge; extension of the Olema Valley Trail to the Bolinas triangle, perhaps on the East side of Highway 1; greater access for bikes on ranch roads in the park; and a transparent process that would allow for bicycle events to be held in the park.

Many thanks for your consideration of how to make appropriate changes to the GMP to make cycling in Pt. Reyes and on the Bolinas Ridge an even better opportunity to explore and learn from the incredible natural resources in Marin.

Warm regards, Michael

#526

Name: Thompson, Dorinda

Correspondence: I feel very strongly, as a citizen, hiker and horsewoman, that we need to maintain some of our wilderness areas **WITHOUT WHEELED VEHICLES OF ANY TYPE**. Bikes can travel in many areas right now, and any biker has the option to hike into areas not open to bike traffic. No one is keeping bikers from those areas; only their bikes are prohibited. There will be no more wilderness if bikes are allowed access to all precious and vulnerable areas. There is also more erosion on trails with bike traffic. On trails which currently allow horse access, having a mountain bike whip suddenly up behind a horse and rider creates a very dangerous situation for all parties. Horses do not understand that unexpected fast-moving wheeled vehicles are not predators. They can react by spooking, bucking, kicking and bolting. This is not a reaction which can be completely "trained out" of any horse.

Please maintain our current wilderness policies of prohibiting bicycle traffic from some trails. Thank you.

#527

Name: Donaghy, Jimmy

Correspondence: Hello, I enjoy the natural beauty of our great state from the seat of my mountain bike. I have been in several areas that have limited access or stretches of trails that cannot be accessed by bicycle which can be very frustrating. I'd like to add my voice to those who are respectfully asking for the following additions to the park plan:

A new trail between Devil's Gulch and Platform Bridge through the Cheda, McIsaac, and Zanardi Ranches.

A plan to connect the Cross Marin Trail into Point Reyes.

Adoption of social trails off Bolinas Ridge for better connectivity and a single-track trail experience.

Extend the Olema Valley Trail to Bolinas on the east side of Highway 1.

Close gaps for bikes through ranch lands in the park, including closing the Estero Trail loop, connecting Sir Francis Drake Blvd. with Pierce Point Road, and connecting Marshall Beach to Pierce Point Road,

A more bike-friendly permit application process for road and mountain bike events in the park, including along Bolinas Ridge and out to the lighthouse.

Bike access to all ranch roads in the pastoral zone that are already open to pedestrians

Thanks for your consideration, Jimmy

#528

Name: Clutton , Chris

Correspondence: Please open some trails to mountain biking. Off road riding opportunities are almost nonexistent in the west Marin area!

#529

Name: Palka, Dana

Correspondence: Ranchers need to learn how to share public lands. Not everything is about the almighty dollar. Please protect the Tule elk!

#530

Name: Raleigh, Kenneth

Correspondence: Thank you for the opportunity to comment.

I support all of the following new trails, connectivity and access for cyclists in Point Reyes National Seashore area.

1. A new trail between Devil's Gulch and Platform Bridge through the Cheda, McIsaac, and Zanardi Ranches.
2. A plan to connect the Cross Marin Trail into Point Reyes.
3. Adoption of social trails off Bolinas Ridge for better connectivity and a single-track trail experience.
4. Extend the Olema Valley Trail to Bolinas on the east side of Highway 1.
5. Close gaps for bikes through ranch lands in the park, including closing the Estero Trail loop, connecting Sir Francis Drake Blvd. with Pierce Point Road, and connecting Marshall Beach to Pierce Point Road,
6. A more bike-friendly permit application process for road and mountain bike events in the park, including along Bolinas Ridge and out to the lighthouse.
7. Bike access to all ranch roads in the pastoral zone that are already open to pedestrians.

Thank you for your consideration.

#531

Name: N/A, N/A

Correspondence: Point Reyes belongs to the American people and to American wildlife for the public and environmental good, not to private ranchers for private profit.

#532

Name: McKenna, Sean

Correspondence: I'd like to echo MCBC's priorities:

A new trail between Devil's Gulch and Platform Bridge through the Cheda, McIsaac, and Zanardi Ranches.

A plan to connect the Cross Marin Trail into Point Reyes.

Adoption of social trails off Bolinas Ridge for better connectivity and a single-track trail experience.

Extend the Olema Valley Trail to Bolinas on the east side of Highway 1.

Close gaps for bikes through ranch lands in the park, including closing the Estero Trail loop, connecting Sir Francis Drake Blvd. with Pierce Point Road, and connecting Marshall Beach to Pierce Point Road,

A more bike-friendly permit application process for road and mountain bike events in the park, including along Bolinas Ridge and out to the lighthouse.

Bike access to all ranch roads in the pastoral zone that are already open to pedestrians.

Thank you

#533

Name: J., A.

Correspondence: As an equestrian who enjoys Point Reyes, and at risk of being excommunicated from the equestrian community, I support the bicycle specific projects proposed by the Marin County Bicycle Coalition. They are all reasonable proposals. I am tired of the few, very loud equestrians fighting against bicycle access on every inch of soil in our county. I know several of them and they are not people who take the time to prepare their horses for everything we can encounter in the outdoors. I work with my horse a lot. He is unafraid of bicycles. I have had hundreds of positive encounters with bicyclists, and only one scary one. I've had far more scary experiences (on my horse) with off leash dogs and clueless children. But overall, everyone is out to enjoy the Point Reyes area and not out to ruin anyone's day. I apologize in advance for all the comments you are likely receiving from seriously entrenched equestrians and equestrian organizations. The people behind those comments, which unanimously oppose bicycles almost anywhere, are the minority in the equestrian community. Take their comments with a grain of salt. Thank you. - AJ

#534

Name: N/A, N/A

Correspondence: As an equestrian and hiker I value the wilderness and natural quiet trails. It is also important that visitors experience quality trails and they be maintained for the majority (foot folks). Horses are often spooked by fast bikes and can be dangerous. Keep the trails nice and relaxing for hikers and horse folks. The bikers already have 75% - that is enough. Please keep and have maintained the trails for foot and equestrian trails. It is a gem I would hate to lose.

#535

Name: OBrien, Kim

Correspondence: Dear Park Service,

I grew up in Marin and have been using the open space trails since the 1960s. I have seen the trails become very worn and bald and hardened. While all of us have an impact on the natural land, the many bicycles have a strong footprint. The wear and tear on the trails are part of this. Also, the mileage covered in the wilderness is regularly more than the typical hikers and equestrians. This increases the human impact on wildlife hugely. As a hiker and equestrian I encounter many respectful bicycle riders each week on the trails. I also encounter at least once a week an illegal rider or group. These encounters have been frustrating and often dangerous. The speed that many bikers seek is threatening to me as a hiker and an equestrian. Last month a biker crossed a fire road and almost hit me as I hiked on Mt. Burdell. He didn't see me because he was at max speed and just looking at the five feet in front of his bike. This need to be on guard for fast speeding bikes takes away from the experience in nature. China Camp is a popular park with bicyclists. I have spoken to hikers, equestrians, and runners who, like me, choose to not use the trails there because of the need to be on guard to jump out of the way of a fast moving bike. The bicycle community's activist has sent out a letter to bicyclists in and out of our county to inundate you with requests to open the trails to bicycles. As a citizen I ask that we keep our National Park visitors to foot traffic. Please do not open these trails to tire traffic.

Sincerely,

Kim OBrien

#536

Name: Stormer, Eric

Correspondence: Please allow more Bicycle access in the Point Reyes National Park. Don't be a dumb ass like our President, do the right thing! Please!

#537

Name: Brown, Gabe

Correspondence:

A new trail between Devils Gulch and Platform Bridge through the Cheda, McIsaac, and Zanardi Ranches.

A plan to connect the Cross Marin Trail into Point Reyes.

Adoption of social trails off Bolinas Ridge for better connectivity and a single-track trail experience.

Extend the Olema Valley Trail to Bolinas on the east side of Highway 1.

Close gaps for bikes through ranch lands in the park, including closing the Estero Trail loop, connecting Sir Francis Drake Blvd. with Pierce Point Road, and connecting Marshall Beach to Pierce Point Road,

A more bike-friendly permit application process for road and mountain bike events in the park, including along Bolinas Ridge and out to the lighthouse.

Bike access to all ranch roads in the pastoral zone that are already open to pedestrians.

Again, thank you for the opportunity to comment.

#538

Name: Vendetti, Marc

Correspondence: Dear NPS Representative:

I SUPPORT the following bicycling initiatives in the park:

1. A new trail between Devil's Gulch and Platform Bridge through the Cheda, McIsaac, and Zanardi Ranches.
2. Connecting the Cross Marin Trail into Point Reyes.
3. The adoption of social trails off Bolinas Ridge for better connectivity and a single-track trail experience.
4. Extending the Olema Valley Trail to Bolinas on the east side of Highway 1.
5. Closing gaps for bikes through ranch lands in the park, including the Estero Trail loop, connecting Sir Francis Drake Blvd. with Pierce Point Road, and connecting Marshall Beach to Pierce Point Road.
6. A more bike-friendly permit application process for road and mountain bike events in the park, including along Bolinas Ridge and out to the lighthouse.
7. Bike access to all ranch roads in the pastoral zone that are already open to pedestrians.

I feel that these changes will greatly enhance my experience of the park, and that for many others as well. Cycling should be encouraged more effectively throughout the park.

Thank you for your time and consideration.

Marc Vendetti

#539

Name: Vitti, Michael

Correspondence: My family lives nearby and I visit the area frequently. I am a mountain biker and hiker but I prefer mountain biking because I can see more nature in the same amount of time and hiking hurts my joints as I age. Please support the following:

A new trail between Devil's Gulch and Platform Bridge through the Cheda, McIsaac, and Zanardi Ranches.

A plan to connect the Cross Marin Trail into Point Reyes.

Adoption of social trails off Bolinas Ridge for better connectivity and a single-track trail experience.

Extend the Olema Valley Trail to Bolinas on the east side of Highway 1.

Close gaps for bikes through ranch lands in the park, including closing the Estero Trail loop, connecting Sir Francis Drake Blvd. with Pierce Point Road, and connecting Marshall Beach to Pierce Point Road,

A more bike-friendly permit application process for road and mountain bike events in the park, including along Bolinas Ridge and out to the lighthouse.

Bike access to all ranch roads in the pastoral zone that are already open to pedestrians.

#540

Name: N/A, N/A

Correspondence: Thank you for the opportunity to comment.

I am a hiker and mountain biker. Please consider the following:

A new trail between Devils Gulch and Platform Bridge through the Cheda, McIsaac, and Zanardi Ranches.

A plan to connect the Cross Marin Trail into Point Reyes.

Adoption of social trails off Bolinas Ridge for better connectivity and a single-track trail experience.

Extend the Olema Valley Trail to Bolinas on the east side of Highway 1.

Close gaps for bikes through ranch lands in the park, including closing the Estero Trail loop, connecting Sir Francis Drake Blvd. with Pierce Point Road, and connecting Marshall Beach to Pierce Point Road,

A more bike-friendly permit application process for road and mountain bike events in the park, including along Bolinas Ridge and out to the lighthouse.

Bike access to all ranch roads in the pastoral zone that are already open to pedestrians.

Thanks.

#541

Name: Rivenes, Donald

Correspondence: Whatever alternative is chosen, I ask that no additional biking trails be created at the Pt. Reyes National Seashore. More than 450 species of birds and 72 species of mammals have been identified in the area, including seals and other marine animals that often gather along the bays and esteros. Any mechanical advantage - whether it is a dirt bike or a mountain bike - shrinks the passive recreation opportunities. Those walking are easily surpassed by those using mechanical means, which can psychologically dismay other users. On heavily used trails, the threat of a fast moving bike changes the experience for other trail users. If you are a hiker, the ability to relax and soak in the natural world is impeded when one is anxious about having to jump out of the way of a bike. My wife and I have done many bike rides along the highways of the seashore out to the lighthouse and were able to utilize trails on foot from various locations to access rare migrant bird species in the fall. I also would like to emphasize that the Phillip Burton Wilderness must continue to exclude mountain biking.

#542

Name: Sullivan, Karen

Correspondence: Pt. Reyes National Seashore is an incredible wilderness area that is mostly in a natural state/ I have been hiking and horseback riding since 1990 and use Stewarts Horse Camp multiple times every year. It is worth the 3 hour drive from Kelseyville to enjoy this incredible area. One of the reasons so many equestrians use the camp and trails is that most are closed to mountain bikes. Mountain bikes do NOT belong on any hiker or horse trails as they threaten the safety of other trail users by going too fast, damaging trails, refusing to slow down and riding illegally. Mountain bikers have many other trails and roads to ride in Marin County, and equestrians are finding fewer and fewer safe trails. The trails at Pt. Reyes are narrow, often steep and with thick vegetation-giving no sight-lines to see coming bikes. There have been many many bike-caused accidents at Pt. Reyes over the years, with some riders getting dumped when bikes slam into their horses with no warning-one rider was airlifted out twice, once with a broken back. Multi-use trails need to be wide enough for safe passing, with good visibility and the Pt. Reyes trails are barely adequately maintained for safe horseback riding many times of the year due to maintenance restrictions. Mountain bikers have been tracked on STRAVA, illegally riding on all Pt. REyes trails

off limits to bikes, and setting speed records down Stewards multi use trail, and even Greenpicker, which is off limits to bikes. they do not follow the rule or ride responsibly as a group. I would be happy to provide accidents and STRAVA data about this. The Marin Horse Council also has such information. Please to not give into the pressure from bike groups that want access on every trail, despite it not being appropriate or safe for other trail users. The Equestrian use over the past 3 decades has been very consistent and valued.

#543

Name: H.C., Coral

Correspondence: I would like to confirm that MCBC is a really great organization and I think Point Reyes and the community could really benefit from more outdoor improved trails. Being in nature is proven to reduce stress and fight cancer due to the fresh air from trees. Please help MCBC making:

A new trail between Devil's Gulch and Platform Bridge through the Cheda, McIsaac, and Zanardi Ranches.

A plan to connect the Cross Marin Trail into Point Reyes.

Adoption of social trails off Bolinas Ridge for better connectivity and a single-track trail experience.

Extend the Olema Valley Trail to Bolinas on the east side of Highway 1.

Close gaps for bikes through ranch lands in the park, including closing the Estero Trail loop, connecting Sir Francis Drake Blvd. with Pierce Point Road, and connecting Marshall Beach to Pierce Point Road,

A more bike-friendly permit application process for road and mountain bike events in the park, including along Bolinas Ridge and out to the lighthouse.

Bike access to all ranch roads in the pastoral zone that are already open to pedestrians.

#544

Name: Sell, Andrew

Correspondence: A new trail between Devils Gulch and Platform Bridge through the Cheda, McIsaac, and Zanardi Ranches.

A plan to connect the Cross Marin Trail into Point Reyes.

Adoption of social trails off Bolinas Ridge for better connectivity and a single-track trail experience.

Extend the Olema Valley Trail to Bolinas on the east side of Highway 1.

Close gaps for bikes through ranch lands in the park, including closing the Estero Trail loop, connecting Sir Francis Drake Blvd. with Pierce Point Road, and connecting Marshall Beach to Pierce Point Road,

A more bike-friendly permit application process for road and mountain bike events in the park, including along Bolinas Ridge and out to the lighthouse.

Bike access to all ranch roads in the pastoral zone that are already open to pedestrians.

#545

Name: Mueller, Marcus

Correspondence: Thank you for the opportunity to comment. Unfortunately new mountain bike opportunities in Point Reyes Seashore and on GGNRA lands has been absent. It is time to review current connectivity gaps and loop opportunities for mountain biking. All improvements for mountain biking can also be shared with hikers and the two uses are very compatible.

Here are the access improvements I would love to see developed:

A new trail between Devils Gulch and Platform Bridge through the Cheda, McIsaac, and Zanardi Ranches.

A plan to connect the Cross Marin Trail into Point Reyes.

Adoption of social trails off Bolinas Ridge for better connectivity and a single-track trail experience.

Extend the Olema Valley Trail to Bolinas on the east side of Highway 1.

Close gaps for bikes through ranch lands in the park, including closing the Estero Trail loop, connecting Sir Francis Drake Blvd. with Pierce Point Road, and connecting Marshall Beach to Pierce Point Road,

A more bike-friendly permit application process for road and mountain bike events in the park, including along Bolinas Ridge and out to the lighthouse.

Bike access to all ranch roads in the pastoral zone that are already open to pedestrians.

Again, thank you for the opportunity to comment.

#546

Name: Burnham, Alex

Correspondence: First let me say Thank you for the opportunity to comment. I am a long time Marin County resident and have enjoyed Pt Reyes Nat'l Seashore throughout my life, even before moving to Marin some 40 years ago. However, I have not been able to enjoy it from the saddle of my mountain bike, with the exception of the few legal fire roads.

This is why I am excited to hear you are considering opening up trails through the options listed below. As an advocate for equal trail access for my form of recreation, a long time trail steward working with the various land managers throughout Marin, and putting in countless hours of volunteer trail maintenance, I can way this opportunity will be met with enthusiasm and offers to help from the mountain bike community. We are always ready to help our land managers with large groups of volunteers!

This is the list of options I understand is on the table to consider:

A new trail between Devils Gulch and Platform Bridge through the Cheda, McIsaac, and Zanardi Ranches.

A plan to connect the Cross Marin Trail into Point Reyes.

Adoption of social trails off Bolinas Ridge for better connectivity and a single-track trail experience.

Extend the Olema Valley Trail to Bolinas on the east side of Highway 1.

Close gaps for bikes through ranch lands in the park, including closing the Estero Trail loop, connecting Sir Francis Drake Blvd. with Pierce Point Road, and connecting Marshall Beach to Pierce Point Road,

A more bike-friendly permit application process for road and mountain bike events in the park, including along Bolinas Ridge and out to the lighthouse.

Bike access to all ranch roads in the pastoral zone that are already open to pedestrians.

Again, thanks for the opportunity to comment and look forward to realizing the fruition of these projects.

#547

Name: McDaniel, Stephen

Correspondence: To whom it may concern,

As you review your leased land management practices, I would like to voice my support for the following projects:

1. A new trail between Devil's Gulch and Platform Bridge through the Cheda, McIsaac, and Zanardi Ranches.
2. A plan to connect the Cross Marin Trail into Point Reyes.
3. Adoption of social trails off Bolinas Ridge for better connectivity and a single-track trail experience.
4. Extend the Olema Valley Trail to Bolinas on the east side of Highway 1.
5. Close gaps for bikes through ranch lands in the park, including closing the Estero Trail loop, connecting Sir Francis Drake Blvd. with Pierce Point Road, and connecting Marshall Beach to Pierce Point Road,
6. A more bike-friendly permit application process for road and mountain bike events in the park, including along Bolinas Ridge and out to the lighthouse.
7. Bike access to all ranch roads in the pastoral zone that are already open to pedestrians.

Thank you for your consideration,

Stephen McDaniel

#548

Name: Larsen, Eric

Correspondence: I support MCBC Point Reyes priorities:

A new trail between Devil's Gulch and Platform Bridge through the Cheda, McIsaac, and Zanardi Ranches.

A plan to connect the Cross Marin Trail into Point Reyes.

Adoption of social trails off Bolinas Ridge for better connectivity and a single-track trail experience.

Especially: Extend the Olema Valley Trail to Bolinas on the east side of Highway 1.

Close gaps for bikes through ranch lands in the park, including closing the Estero Trail loop, connecting Sir Francis Drake Blvd. with Pierce Point Road, and connecting Marshall Beach to Pierce Point Road,

A more bike-friendly permit application process for road and mountain bike events in the park, including along Bolinas Ridge and out to the lighthouse.

Bike access to all ranch roads in the pastoral zone that are already open to pedestrians.

#549

Name: Alexander, Nancy

Correspondence: Point Reyes is one of the only places we can still ride horses without bikes on the trail. There are a lot of trails open to bikes, not so many to horses. Please don't take away our trails for only horses and hikers! I was riding in another park with multi-use trails and had two bikes, racing each other, slide and spray gravel BETWEEN me and the other horse right in front of me. Both horses bolted, and my horses tolerate almost anything! Two younger boys who didn't think about others on the trail. There are many trails we can no longer ride safely on because bike riders are out to go fast, especially downhill, and they are dangerous to us hikers and equestrians. I know not all bike riders are inconsiderate of others on the trails, but unfortunately a lot are. I don't think that is what you hear about hikers and equestrian riders. Please, it is wonderful to have trails that are for hikers and equestrian riders only. I urge you to keep it that way.

#550

Name: Tucker, Pia

Correspondence: Thank you for giving us an opportunity to voice concern regarding the proposed expansion of bike access at Pt Reyes National Park.

I have greatly enjoyed the beauty of Pt Reyes both as a hiker and as an equestrian. I truly believe the current trail access distribution is fair, ie: certain trails closed to horses on weekends, certain trails closed to bikes etc. This allows space for all to enjoy this natural gem in a manner to each individuals' liking and provides for avoidance of potentially dangerous interactions between bikes/horses, fast moving bikes and young children (my 4 year old granddaughter came very close to serious injury from a fast moving trail bike), horses/hikers or worse yet, all three at once.

Thank you for your attention to this matter,

Pia T. Tucker

#551

Name: Waite, Andrew

Correspondence: Thank you for the opportunity to comment. Our family frequently visits Point Reyes for the outdoor experience in this unique and beautiful location. In fact not long ago I presided over the wedding ceremony for my mother in Point Reyes near the lighthouse! We are all also avid mountain bikers (including my 71 year old newlywed mother!) and would greatly appreciate more access for mountain biking there.

Access improvements we are interested in seeing developed:

A new trail between Devils Gulch and Platform Bridge through the Cheda, McIsaac, and Zanardi Ranches.

A connection between the Cross Marin Trail and Point Reyes.

Adoption of social trails off Bolinas Ridge for better connectivity and a single-track trail experience.

Extend the Olema Valley Trail to Bolinas on the east side of Highway 1.

Close gaps for bikes through ranch lands in the park, including closing the Estero Trail loop, connecting Sir Francis Drake Blvd. with Pierce Point Road, and connecting Marshall Beach to Pierce Point Road,

A bike-friendly permit application process for mountain bike events in the park,

Bike access to all ranch roads in the pastoral zone that are already open to pedestrians.

Again, thank you for the opportunity to comment.

#552

Name: Stone, Anita

Correspondence: Please retain Point Reyes National Seashore trails for hikers and Equestrians ONLY. Bicyclists already have access to 75% of all the counties trails. They gave ample places to ride, they do NOT need to take over Point Reyes Park.

Please allow Point Reyes to remain a place for hikers and equestrians to enjoy without the danger of cyclists that want to rip through the trails.

Horses help build this nation, allow them a refuge and their riders too!

#553

Name: Howe, Michael

Correspondence: I have resided in Marin County, California since 1969 and lived in our home in San Geronimo since 1976. I am an active hiker, and road and mountain biker enjoying the natural beauty of West Marin for almost 50 years. The EIS Public comment opportunity for the Point Reyes National Seashore non-wilderness areas is an opportunity to extend the benefits that hikers and equestrians have to bikers in those areas that are owned and leased for agricultural purposes by the Point Reyes National Seashore. For example: 1) A new trail between Devil's Gulch and Platform Bridge through the Cheda, McIsaac, and Zanardi Ranches.

2) A plan to connect the Cross Marin Trail into Point Reyes.

3) Adoption of social trails off Bolinas Ridge for better connectivity and a single-track trail experience.

4) Extend the Olema Valley Trail to Bolinas on the east side of Highway 1.

5) Close gaps for bikes through ranch lands in the park, including closing the Estero Trail loop, connecting Sir Francis Drake Blvd. with Pierce Point Road, and connecting Marshall Beach to Pierce Point Road,

6) A more bike-friendly permit application process for road and mountain bike events in the park, including along Bolinas Ridge and out to the lighthouse.

7) Bike access to all ranch roads in the pastoral zone that are already open to pedestrians.

Thank you for your consideration, Michael Howe

#554

Name: Livingston, Marshall

Correspondence: We need more access to Point Reyes National Seashore lands for bicycling. Specifically I would like:

The Rift Zone trail through Vedanta Society land should be open to bikes. NPS should enforce this.

Road to the lighthouse should be open to bikes when the shuttle service is operating.

A new trail between Devil's Gulch and Platform Bridge through the Cheda, McIsaac, and Zanardi Ranches.

A plan to connect the Cross Marin Trail into Point Reyes.

Adoption of social trails off Bolinas Ridge for better connectivity and a single-track trail experience.

Extend the Olema Valley Trail to Bolinas on the east side of Highway 1.

Close gaps for bikes through ranch lands in the park, including closing the Estero Trail loop, connecting Sir Francis Drake Blvd. with Pierce Point Road, and connecting Marshall Beach to Pierce Point Road,

A more bike-friendly permit application process for road and mountain bike events in the park, including along Bolinas Ridge and out to the lighthouse.

Bike access to all ranch roads in the pastoral zone that are already open to pedestrians.

#555

Name: Barber, Todd

Correspondence: Hello, I wanted to drop a note and encourage the NPS to open more trails up to multiple use and include mountain bikers. There are so many multi use trails in the Point Reyes area and Mountain Bikers have proven we can share and be respectful with all user groups. We really hope that that the following areas can be considered.

A new trail between Devils Gulch and Platform Bridge through the Cheda, McIsaac, and Zanardi Ranches.

A plan to connect the Cross Marin Trail into Point Reyes.

Adoption of social trails off Bolinas Ridge for better connectivity and a single-track trail experience.

Extend the Olema Valley Trail to Bolinas on the east side of Highway 1.

Close gaps for bikes through ranch lands in the park, including closing the Estero Trail loop, connecting Sir Francis Drake Blvd. with Pierce Point Road, and connecting Marshall Beach to Pierce Point Road,

A more bike-friendly permit application process for road and mountain bike events in the park, including along Bolinas Ridge and out to the lighthouse.

Bike access to all ranch roads in the pastoral zone that are already open to pedestrians.

Thank you for your help and assistance.

#556

Name: Livingstone, Betsy

Correspondence: I am strongly opposed to the granting of leases for continue dairy ranching on Point Reyes for several reasons. 1. The healthy herds of tule elk represent the historic restoration of natural processes in the National Park and to remove or cull them in favor of private agriculture in the Park is just wrong. 2. The ranchers were well aware that their previous leases were running out and that the original plan called for the eventual restoration of parklands. I see no compelling reason why private enterprise (ranching) should take precedence over the preservation of nature. 3. Preservation is a big part part of the stated mission of the National Parks, along with the opportunity for all of us to visit wilderness. To sacrifice both of these core values in favor of the economic well-being of a few private ranchers is much too big a price to pay. A price which all the rest of us citizen taxpayers should not have to support. 4. Ranching inevitably causes degraded land, pollution, and excessive use of scarce resources including water.

For these and other reasons, I ask that you not allow these leases to go forward, and to allow parkland to be parkland.

Betsy Livingstone

#557

Name: Minnich, Sunday

Correspondence: We ask that you please do not allow this to happen. Please preserve the trails by keeping them the way they are now, with horse access. Bikes create ruts and safety issues for horses.

#558

Name: Birkie, Wolfe

Correspondence: Thank you for the opportunity to comment. Mountain biking has grown much in popularity and now represents your second largest user group at around 40%. Unfortunately new mountain bike opportunities in Point Reyes Seashore and on GGNRA lands has been absent. It is time to review current connectivity gaps and loop opportunities for mountain biking. All improvements for mountain biking can also be shared with hikers and the two uses are very compatible. Here are the access improvements I am interested in seeing developed:

A new trail between Devils Gulch and Platform Bridge through the Cheda, McIsaac, and Zanardi Ranches.

A plan to connect the Cross Marin Trail into Point Reyes.

Adoption of social trails off Bolinas Ridge for better connectivity and a single-track trail experience.

Extend the Olema Valley Trail to Bolinas on the east side of Highway 1.

Close gaps for bikes through ranch lands in the park, including closing the Estero Trail loop, connecting Sir Francis Drake Blvd. with Pierce Point Road, and connecting Marshall Beach to Pierce Point Road,

A more bike-friendly permit application process for road and mountain bike events in the park, including along Bolinas Ridge and out to the lighthouse.

Bike access to all ranch roads in the pastoral zone that are already open to pedestrians.

Again, thank you for the opportunity to comment.

#559

Name: McCredie, Gail

Correspondence: Thank you for your consideration of my comment:

Mountain bikes already have access to over 75% of the trails in Marin County. Please deny their access to the valuable Pt Reyes National Seashore trails. The trails are very fragile and require close guarding against the damage hordes of mountain bikers do to the surrounding areas, including animals, plants, and the trails themselves. The Pt Reyes National Seashore is one of a very few places left where mountain bikes do not disturb the peaceful and bountiful surroundings.

Thank you, Gail McCredie

#560

Name: Hurwin, Duffy

Correspondence: Please do not cave in to the demands of the minority trail user group, the bicyclists, who loadly demand access to every trail they can get their wheels on. Point Reyes National Seashore he's one of the few parks in Marin County be raft of mountain bikers. The trails are used exclusively by hikers in the majority and horseback riders. There are over 2 million visitors per year. I have been riding those trails for over 15 years and many of them are single track narrow trails with poor sightlines. They are inappropriate for sharing with mountain bikers who would like to, in their own nomenclature, "shred" the trails which would cause great erosion and damage and be very hazardous for those on foot. As it is, the maintenance of those trails is very stretched and can only be done after spotted owl season which always is at the end of the summer. That means that all the ruts that would be created by bicycle tires would be completely hardened and dried by the time any maintenance crew could get around to working on them. When the trails are wet after rain, there are far fewer hikers & horses as these two user groups, Who are very compatible in their slow usage of the trails, do not go on the narrow muddy trails very much in the winter. Cyclists, On the other hand, love to shred wet muddy trails and cause far more erosion that way. The bicycle tire ruts creates far more aggressive runoff and therefore deepens the tracks creating than even more runoff, erosion and trip hazards to those on foot. There are already so many user conflicts between the high-speed cyclists and the slower pedestrians. Point Reyes Nationsl Seashore wilderness area offers a tranquil nature experience that is not possible when one is constantly on the lookout for a wheeled vehicle barreling down a trail. Please do not destroy the tranquil experience in nature offered by this park by caving in to the demands a very small but very loud user group.

#561

Name: N/A, Kim

Correspondence: Please don't allow mountain bikers in Pt.Reyes National seashore wilderness trails. The park already is over "loved" by Californians and tourists alike. We need to preserve and protect our wild spaces. Bikers have access to plenty of trail systems in California. Often, they cause serious erosion and impact on hikers and equestrians seeking to enjoy a serene outing. Limit their expansion, please. Thanks! Kim

#562

Name: N/A, Jane

Correspondence: I support Marin County Bicycle Coalition's proposals for improved access for biking at Pt. Reyes National Seashore. Thank you for your consideration.

-A new trail between Devil's Gulch and Platform Bridge through the Cheda, McIsaac, and Zanardi Ranches.

-A plan to connect the Cross Marin Trail into Point Reyes.

-Adoption of social trails off Bolinas Ridge for better connectivity and a single-track trail experience.

-Extend the Olema Valley Trail to Bolinas on the east side of Highway 1.

-Close gaps for bikes through ranch lands in the park, including closing the Estero Trail loop, connecting Sir Francis Drake Blvd. with Pierce Point Road, and connecting Marshall Beach to Pierce Point Road,

-A more bike-friendly permit application process for road and mountain bike events in the park, including along Bolinas Ridge and out to the lighthouse.

-Bike access to all ranch roads in the pastoral zone that are already open to pedestrians.

#563

Name: Wishart, Diane

Correspondence: Please preserve the trails and parklands of Pt Reyes. Bicycles have no business ruining the trails in this sensitive area. There are trails that not even horses can go on and most of the trails in the area do not lend themselves to multi-use designation. Bicycles have access to over 75% of the trails in the Marin Parkland area and further access to Pt Reyes trails by bikes would severely damage the narrow, sensitive trails.

I have ridden these trails for years on horseback and find that they do not lend themselves to bicycle use. The destruction by the bikes could close trails to all users and ruin the parks for everyone.

Thank you,

Diane Wishart

#564

Name: Miller, Eric

Correspondence: I urge you to include the following in your plan for management practices for the Point Reyes National Seashore:

1.A new trail between Devil's Gulch and Platform Bridge through the Cheda, McIsaac, and Zanardi Ranches.

2.A plan to connect the Cross Marin Trail into Point Reyes.

3.Adoption of social trails off Bolinas Ridge for better connectivity and a single-track trail experience.

4.Extend the Olema Valley Trail to Bolinas on the east side of Highway 1.

5.Close gaps for bikes through ranch lands in the park, including closing the Estero Trail loop, connecting Sir Francis Drake Blvd. with Pierce Point Road, and connecting Marshall Beach to Pierce Point Road,

6.A more bike-friendly permit application process for road and mountain bike events in the park, including along Bolinas Ridge and out to the lighthouse.

7.Bike access to all ranch roads in the pastoral zone that are already open to pedestrians.

#565

Name: Doblado, Manuel

Correspondence: I support multi use trails and sharing amongst all trail users hikers, equestrians, cyclists.

Recreation in the outdoors is a critical part of our communities especially for a healthy and prosperous people.

#566

Name: Julian-Vasquez, Nicola

Correspondence: To Whom It May Concern, Adding bicycles to the mix of hikers and equestrians on the lovely trails at Point Reyes is a seriously dangerous proposition. Many bicyclists ride fast, often using earbuds and pose a huge threat to hikers (especially children and elderly with limited reflexes), equestrians (especially where visibility is reduced on sharp corners, overgrown trails, etc.) and to the sensitive terrain. We attempt to ride together congenially where multi-use is permitted, and inevitably about 10% of the riders (both horse and bike) are rude, non-rule abiding, speed-demon jerks who tend to ruin the reputation and well-meaning efforts of all others. However, bicycle and horse collisions can be a life-and-death situation, often ending with equestrians paralyzed or permanently injured or death. Bicyclists must look down on the trail for their own safety....they must navigate around roots, ruts, rocks, etc. They rarely see we equestrians in time (especially if they're wearing earbuds) to prevent an accident. I have personally narrowly escaped being run into (several different times) by downhill bicyclists unable to stop in time and skidding almost onto my terrified horse. With narrow, steep trails, the only alternative is for the horse to leap off the cliff, which happens. If bicyclists are not in the mix, we equestrians can ride in peace (instead of having to constantly watch out for those silent speedy riders who don't seem to see or hear us) and enjoy this magnificent park without fear. I have much more to say about this subject, but will stop now. Please contact me if I can elaborate or be helpful in the argument against allowing bicyclists on the Point Reyes NP trails. This is a very serious issue and I hope that we equestrians will be heard! Thank You. Sincerely, Nicola Julian-Vasquez (63 and still enjoying your trails tremendously!)

#567

Name: Vandeman, Mike

Correspondence: Bicycles should not be allowed on any unpaved trail! They are environmentally and medically destructive. No one has ever proposed a good reason to allow bicycles on trails. Mountain bikers are notorious for breaking ALL rules. If they are allowed on trails, they will soon be riding off-trail. That's because they travel so fast that they don't experience anything they are passing, and hence quickly get bored with any given trail, and want another and another. Mountain bikers are inherently insatiable!

Bicycles should not be allowed in any natural area. They are inanimate objects and have no rights. There is also no right to mountain bike. That was settled in federal court in 1996: <https://mjvande.info/mtb10.htm> . It's dishonest of mountain bikers to say that they don't have access to trails closed to bikes. They have EXACTLY the same access as everyone else - - ON FOOT! Why isn't that good enough for mountain bikers? They are all capable of walking....

A favorite myth of mountain bikers is that mountain biking is no more harmful to wildlife, people, and the environment than hiking, and that science supports that view. Of course, it's not true. To settle the matter once and for all, I read all of the research they cited, and wrote a review of the research on mountain biking impacts (see <https://mjvande.info/scb7.htm>). I found that of the seven studies they cited, (1) all were written by mountain bikers, and (2) in every case, the authors misinterpreted their own data, in order to come to the conclusion that they favored. They also studiously avoided mentioning another scientific study (Wisdom et al) which did not favor mountain biking, and came to the opposite conclusions.

Mountain bikers also love to build new trails - legally or illegally. Of course, trail-building destroys wildlife habitat - not just in the trail bed, but in a wide swath to both sides of the trail! E.g. grizzlies can hear a human from one mile away, and smell us from 5 miles away. Thus, a 10-mile trail represents 100 square miles of destroyed or degraded habitat, that animals are inhibited from using. Mountain biking, trail building, and trail maintenance all increase the number of people in the park, thereby preventing the animals' full use of their habitat. See <https://mjvande.info/scb9.htm> for details.

Mountain biking accelerates erosion, creates V-shaped ruts, kills small animals and plants on and next to the trail, drives wildlife and other trail users out of the area, and, worst of all, teaches kids that the rough treatment of nature is okay (it's NOT!). What's good about THAT?

To see exactly what harm mountain biking does to the land, watch this 5-minute video:
<http://vimeo.com/48784297>.

In addition to all of this, it is extremely dangerous: https://mjvande.info/mtb_dangerous.htm .

For more information: <https://mjvande.info/mtbfaq.htm> .

The common thread among those who want more recreation in our parks is total ignorance about and disinterest in the wildlife whose homes these parks are. Yes, if humans are the only beings that matter, it is simply a conflict among humans (but even then, allowing bikes on trails harms the MAJORITY of park users - - hikers and equestrians - - who can no longer safely and peacefully enjoy their parks).

The parks aren't gymnasiums or racetracks or even human playgrounds. They are WILDLIFE HABITAT, which is precisely why they are attractive to humans. Activities such as mountain biking, that destroy habitat, violate the charter of the parks.

Even kayaking and rafting, which give humans access to the entirety of a water body, prevent the wildlife that live there from making full use of their habitat, and should not be allowed. Of course those who think that only humans matter won't understand what I am talking about - - an indication of the sad state of our culture and educational system.

#568

Name: Ruedy, Brenda

Correspondence: Please don't allow bikes in more areas where horses and hikers frequent. The 3 do not mix on narrow and winding trails. Peace and quiet are difficult to find these days, where it is also safe to relax.

#569

Name: Merritt, Curtis

Correspondence: November 26, 2018

National Park Service U. S. Department of the Interior

Re: Opposition to Mountain Biking in Point Reyes National Seashore

To Whom It May Concern:

We represent the "Friends of Pt. Reyes Morgan Horse Ranch" located in Point Reyes National Seashore in Northern California.

Bob Marshall, like Aldo Leopold, drafted early Forest Service rules on wilderness areas, including their own core values as undeveloped landscapes accessed without motors and with "no possibility of conveyance by any mechanical means." Marshall then helped form The Wilderness Society in 1935 to guard those ideals in an increasingly mechanized age. This group eventually led the movement for legislated wilderness.

In 1964, President Lyndon B. Johnson signed the Wilderness Act into law. At that time America was in need of comprehensive environmental safeguards; particularly ones that could protect entire ecosystems. The nation was rapidly changing. A more rigorous form of stewardship was, and still is, necessary. The Wilderness Act, which seeks to preserve habitats in their pristine states, was an innovation.

Mountain bikes were not originally banned by the Wilderness Act because that type of bike actually didn't exist in 1964. The original act explicitly prohibited motorized transport. The Sierra Club and Wilderness Society, along with other groups, convinced the U.S. Forest Service to publish a regulation in 1984 explicitly prohibiting mountain bikes in wilderness areas; essentially broadening the exclusion from motorized to mechanized transportation. The other government agencies that manage wilderness areas, the BLM, the National Park Service, and Fish and Wildlife Service, followed suit.

When Howard Zahniser wrote the words that became law, the American notion of wilderness was solidly a place to experience by primitive means, where visitors “depend exclusively on [their] own effort for survival,” as Marshall put it. Along with ecological benefits, goals included preserving the remoteness and challenge that forged the American character and provide solitude, for inspiration, contemplation and renewal. Categorizing the notion was debated for almost a decade, and the Act eventually passed Congress with close to unanimous approval.

The country has continued to expand its motorized and mechanical forms of transportation. A lot has changed since the Wilderness Act was signed into law in 1964, and expanded to include “mechanized transport” in 1984. These wilderness areas need to continue to be maintained in their pristine states providing solitude, inspiration, contemplation, reflection and renewal. We all need to respect these limitations.

There are wilderness areas that are not open to equestrians, wilderness areas that are not open to mountain bikes, and those areas should be preserved and maintained as such. There are numerous areas that are open to one or the other, and some even open to both. Unfortunately, mountain bikes can create a life-threatening hazard to equestrians and be dangerous to hikers, and that needs to be taken into account also. I have personally met some wonderful mountain bikers that are extremely respectful, courteous and cognizant of equestrian’s safety. I have also met the complete opposite types of mountain bikers that are rude, obnoxious, and feel they own the trails, and to hell with everyone else. This is an area that needs education on all sides.

We are not attempting to ban any group from enjoying these characteristics, and everyone is welcome and encouraged to enjoy these magnificent locations, but within the law of the Wilderness Act, without “motorized or mechanical transport”. All mountain bikers can hike, and many already do so. However, one group should not be allowed to disrupt the serenity of other groups. “When bike use on a trail becomes too heavy, many hikers and equestrians abandon it. THAT'S NOT SHARING, THAT'S DISPLACEMENT!”

Respectfully submitted by the FRIENDS OF PT. REYES MORGAN HORSE RANCH COMMITTEE

Co-chair Curtis Merritt Co-chair Connie Barker

#570

Name: Nelson, Marisa

Correspondence: NPS should eliminate agricultural uses in Point Reyes National Seashore. Cattle and other agricultural uses are extremely damaging and have no place in this beautiful park.

#571

Name: N/A, N/A

Correspondence: It is critical that the ranching and dairying remain as part of this historic park. The alternatives are too slick and too many to comfortably distinguish what is happening. The ranchers/dairy families should be free to continue to manage the lands as they have to date without national interference from the park. This park is based with ranching/dairying at the core of the pastoral zone and must remain so. That is what we the public bought and that is what must continue.

Also the ungrazed areas overgrow and become densely tangled impenetrable areas once the animals are removed, an undesirable park quality and a major fire hazard as well. The ranching keeps the meadows open. This should be reflected in the scoping.

Bike trails for the most part should be kept from harrasing ranching activities by not being sited in the Pastoral zone. I do agree that some additional trails in the park would be good to open to be biking: these will be desirable where they do not interfere with existing ranching/dairying. There is far too little biking accessible trail area in the national seashore now and it would be great to increase loops, etc to open more of these very large areas to more visitors to come to and enjoy by bike.

#572

Name: Adams, Chris

Correspondence: I have been visiting Pt. Reyes since the mid-1970's and love this national park. One of my disappointments however is the current lack of bicycle trail access & trail connections to the park and within (non-wilderness areas, of course). I am in favor of these bicycle trail projects moving forward asap:

- 1.A new trail between Devil's Gulch and Platform Bridge through the Cheda, McIsaac, and Zanardi Ranches.
- 2.A plan to connect the Cross Marin Trail into Point Reyes.
- 3.Adoption of social trails off Bolinas Ridge for better connectivity and a single-track trail experience.
- 4.Extend the Olema Valley Trail to Bolinas on the east side of Highway 1.
- 5.Close gaps for bikes through ranch lands in the park, including closing the Estero Trail loop, connecting Sir Francis Drake Blvd. with Pierce Point Road, and connecting Marshall Beach to Pierce Point Road,
- 6.A more bike-friendly permit application process for road and mountain bike events in the park, including along Bolinas Ridge and out to the lighthouse.
- 7.Bike access to all ranch roads in the pastoral zone that are already open to pedestrians.

#573

Name: Galbraith, Eamon

Correspondence: I'm writing to ask for more public access to ranch lands and especially more bike access. In particular I'd like to see the following:

A new trail between Devil's Gulch and Platform Bridge through the Cheda, McIsaac, and Zanardi Ranches.

A plan to connect the Cross Marin Trail into Point Reyes.

Adoption of social trails off Bolinas Ridge for better connectivity and a single-track trail experience.

Extend the Olema Valley Trail to Bolinas on the east side of Highway 1.

Close gaps for bikes through ranch lands in the park, including closing the Estero Trail loop, connecting Sir Francis Drake Blvd. with Pierce Point Road, and connecting Marshall Beach to Pierce Point Road,

A more bike-friendly permit application process for road and mountain bike events in the park, including along Bolinas Ridge and out to the lighthouse.

Bike access to all ranch roads in the pastoral zone that are already open to pedestrians.

Thank you,

#574

Name: Robinson, James

Correspondence: Our whole family (15 of us) supports Alternative F.

#575

Name: Shroyer, Toni

Correspondence: Bikes want access to the wilderness trails in Pt Reyes. This may be harmful to our environment. Protecting Pt Reyes is critical. It is our only wilderness land. There are trails that even horses are not allowed on. It needs to be protected.

All trail users need to work together to protect our environment.

#576

Name: Murphy, Drake

Correspondence: I'm filling this out today because I've heard there's a possibility of allowing human-powered bicycles onto federally owned land in Pt. Reyes, and a number of people from a VERY vocal minority of horse riders and hikers want to stop it. I'm writing today because that would be a heavily misguided decision which would protect the interests of a select group of people rather than make access more democratic. I'm sure the aforementioned groups will state that bikes will do more ecological damage than their existing use, or endanger other trail users. The first claim would be patently false. A thus uncontested peer-reviewed study (Wilson & Seney) conducted in 1994 found that horses typically yielded more sediment dispersal than any other user group on a trail. Anecdotally, it's possible to find a few shallow ruts from bikes or holes from hiker footprints on trails, but typically the deepest potholes and problems come from horses and livestock. Further, the 1995 fire already disturbed large parts of the forest in the park (and how some of it has quickly recovers), allowing a few hundred riders a year won't make anything worse. Most of the reason many people care about natural areas is that access is possible for them. For those of us who aren't retired or have lower incomes (or other impediments on our time or mobility), bikes offer a good way to see the world in a quiet and thoughtful way that doesn't require many hours (or days) to see an area, natural or otherwise, unlike hiking or horseback riding. At a personal level, my decision to major in biology (with a focus on California botany and wildlife) at Cal Poly SLO was almost entirely due to the experiences I had growing up riding my bike all over Mt. Tam and Point Reyes/West Marin as a kid. Inspiring people by allowing them to get a lot more nature in a smaller window of time is incredibly positive and will incentivize further expenditure to protect and expand conservation and natural parks. Cyclists also tend to do a lot of volunteer trail maintenance. This leaves issues between trail users themselves. I suggest testing of horses to make sure they won't spook, and only permitting riding with a bell. That attitude works everywhere else. Or some kind of time alternation. It really shouldn't be that hard. Thank you in advance for reading this. Feel free to reach out to me with rebuttals or concerns. -Drake

#577

Name: Gaspers Jr, Michael

Correspondence: Dear NPS,

I live in San Anselmo, Ca., on Marin County's east-west bicycle route. I totally support the long-proposed extension of this route from the western end of the existing Samuel P. Taylor State Park trail - a safe, off-street paved segment known as the Cross-Marin trail - to Point Reyes Station, through non-wilderness NPS land. This would allow bicycle riders to avoid taking the current dangerous route on Sir Francis Drake Blvd. and State Route

1, and provide a safe and scenic multi-use walking and bicycling path for people of all ages and physical mobility. I believe Pt. Reyes Sta. businesses would benefit from the likely increase in ecotourism from visitors staying at SPT Park.

Multi-use paths are an excellent example of the expression "if you build it, they will come". There is lots of data supporting this. One source: peopleforbikes.org/statistics. Please build this path.

Sincerely,

Michael Gaspers Jr.

#578

Name: N/A, N/A

Correspondence: Bicycling Access in Pt. Reyes National Seashore!

While NPS reviewing leased land management practices, it should consider the following in the area of Pt. Reyes National Seashore.

1. Extend the Cross Marin Trail into Point Reyes. This is a key link to providing access to the National park lands w/o requiring people to get into a car. Critical!
2. Better connections btw the Bay Area Ridge Trail (RT) on Bolinas Ridge and the seashore, allowing "thru" hikers & riders of the RT to "detour" to the coast and the National Seashore lands.
3. Greater access for cyclists to ranch roads that are already open to hikers/walkers.
4. Better connections for cyclists. As park users able to travel greater distances, there needs to be better connectivity throughout the park.

Thank you.

#579

Name: Moskowitz, Olivia

Correspondence: I was born and raised in close proximity to Point Reyes National Seashore. It was my playground as a child and shaped how I view the natural world. (Just the other week, I had the incredible opportunity to backpack in the Park and saw four Tule elk grazing on a hillside.) The beauty and wildness of the Seashore were undoubtedly what led me to pursue a career as a field ecologist. I whole heartedly believe that public land is the United State's most treasured aspect, and should be treated as such. It is not only a place to preserve ecological integrity in an ever-urbanizing world, but it also serves as a place to inspire the public to be passionate about the outdoors, wildlife, and natural and indigenous history.

I will say that I do believe public land can be used by the local community for activities such as ranching- but only in places like BLM and Forest Service lands, not National Parks. I used to work for the Forest Service in Idaho where ranching was not only the local livelihood, but captured local spirit and pride, as well. So I get it. But Point Reyes is a National Park. National Parks were created to preserve special ecosystems and places of cultural significance. Point Reyes is home to dozens of rare and endemic species, many of which are federally listed as threatened and endangered. One of the most glorious creature inhabiting the Park is the Tule elk, which is such a magnificent creature and so vital to the well-being of the Park that it was reintroduced to the Point Reyes after eradication. This makes the fact that ranching is currently endangering the elk and will potentially further wreak havoc on their population all the more disgraceful. Ranching is causing far more harm to the terrestrial and aquatic ecosystems than should ever be allowed in a National Park.

The Park needs to stand up for what it was created to do: protect natural and historical resources, and not give in to special interests looking to make a buck off of our public land. As an ecologist and a proud member of the Point Reyes community, I beg the Point Reyes National Seashore to do what is right and manage the Park as it was intended to be:

"The primary duty of the National Park Service is to protect the national parks and national monuments under its jurisdiction and keep them as nearly in their natural state as this can be done in view of the fact that access to them must be provided in order that they may be used and enjoyed. All other activities of the bureau must be secondary (but not incidental) to this fundamental function relating to care and protection of all areas subject to its control."
-Stephen Mather, 1925

#580

Name: Smith, Paul

Correspondence: November 26, 2018

Dear NPS Staff Officials and other concerned political officials, I am writing to you to express my opinion to the General Management Planning Amendment (GMPA) at Point Reyes National Seashore (PRNS). This process is intended to determine if and how future ranching will be conducted in our national park. I am particularly concerned about and in disagreement with HR 6687, a bill co-sponsored by Rep. Jared Huffman with Rep. Robert Bishop (R-UT) that quickly passed the House without public scrutiny and that presumably will be considered by the Senate. (Rep. Bishop has consistently opposed and has even reduced the size of America's national monuments, and has voted to open public lands to oil and gas, mining, logging, and other commercial industries). Surprisingly, despite decades of controversy over private cattle in the national seashore, HR.6687 was quickly passed on "suspension," without any opportunity for public comment or amendment. My understanding of this bill is that it will extend to 20 years leases of cattle ranching at Pt Reyes and will eliminate Tule Elk, a California native species found in no other National Park. I believe that putting the priority of cattle over native species particularly at this popular park would continue to cause overgrazed rangeland, water pollution, and threats to native wildlife- - including threatened and endangered species- -from continued private ranching at Point Reyes Seashore. Prioritizing private cattle over wildlife in any national park is unacceptable. I am advocating ALTERNATIVE F: NO RANCHING AND EXPANSION OF TULE ELK IN THE PLANNING AREA Please allow the GMPA process to play out and oppose the Senate version of HR 6687. Thank you for your continued service to and stewardship of our National Parks, Sincerely,

Paul and Melanie Smith

#581

Name: Morse, Dan

Correspondence: I have participated in the public scoping process over the last several years. I am familiar with the issues and support the Proposed Community Action Alternative for the Seashore. Ranches must remain as a vital part of our history, and as a vital part of our local food chain. Elk must be managed and kept from dairy and pasture lands. Farm tours and sales on the ranches is a good idea if the ranchers want it. I've lived in Inverness for 50 years full time and spent my summers here for 23 years before that. The ranches are as much a part of our community as I am. Many of the ranchers have had homes here in Inverness and Point Reyes. Please keep them alive and vital. Dan Morse

The Proposed Community Action Alternative should be considered during the EIS process. Elk are new to the ranching areas and therefore should not be included in the 150 year environmental baseline. The adverse impacts of introduced elk to the permitted ranching should be evaluated in this EIS to update the 1998 Elk Environmental Assessment and Elk Management Plan. The park service should issue 20 year rolling leases to the ranchers - every year the 20-year lease automatically renews. This gives the ranchers and the public 20 years notice if ranching is to be discontinued at PRNS. This agreement would be similar to the Williamson Act agreements. Keep annual

compliance meetings between ranchers and PRNS, and keep the NPS 30 day cancellation clause for non-compliance to protect the NPS and public. Advantages of the 20-year rolling leases include: With more security ranchers would take better care of the cultural and natural resources Allows for planning Save NPS time & money Gives next generation ranchers hope for the future Shows a commitment by the Department of the Interior that ranching will continue The park service generally has limited agricultural experience. Park service staff responsible for working with ranchers turn over regularly. No experience, no continuity and regular turn over creates many problems. Ranchers are the only land stewards with institutional knowledge of the resources and are constantly educating new PRNS staff about ranching and dairying. This EIS must evaluate the advantages of creating an Agricultural Advisory Committee. This Ag Advisory Committee could include a member from each of these highly qualified agencies: The USDA Natural Resources Conservation Service, The Marin County Resource Conservation District, The Marin County Agricultural Commissioner, The University of California Cooperative Extension Service, Marin Agricultural Land Trust and Marin County Farm Bureau. This committee should be consulted and should advise PRNS decision makers any time an agricultural question of issue arises. The advantages of using this committee include: Agreements would not be forgotten or overturned Local, regional, state and federal agricultural expertise could be included in decision-making Local, regional, state and federal resource conservation experts would be included in decision-making The local community could be included in decision-making Management of the working lands would not be crippled by turnover of key PRNS staff Individuals with long-term knowledge of the seashore ranches and dairies would be involved in decision-making The Park Service should encourage operational flexibility for the ranchers – including the implementation of best management practices (BMP) including; brush control, weed control, stocking density, water system improvements, fencing and other practices that have been shown to improve rangeland condition and sequester atmospheric carbon in rangeland soils. BMP implementation: Encourages good stewardship Quick decision-making can help ranches remain viable Allow ranchers to make ranching decisions to preserve pastures and buildings Helps to preserve the working landscape for future generations Better for the natural resources Should be allowed on pasture land and rangeland Ranchers who have made silage in the past should be allowed to continue silage production and it should be allowed for other ranchers when requested. Reduces import of feed that could contain weed seeds Portrays to the public the actual historic use at Pt. Reyes. Important range management practice to control weeds Helps balance nutrients at the landscape scale Ranchers should be allowed and encouraged by the Park Service to diversify their ranching activities to include small-scale historic plant and animal production. More properly represents the important historic period (1860-1960) Park Service is entrusted to protect. Adds interest for next generation ranchers Connects the seashore ranchers to the local food system Breaks up the existing cow monoculture making it more interesting, educational and historically accurate for the visiting public Should be allowed on pasture land and rangeland Grazing success and compliance should be measured by resource goals. The goals could include residual dry matter that remains at the end of the grazing season, plant community species composition, plant density, etc. The rancher should be allowed to choose stocking density and stocking rates to meet these goals. There should not be pre-set maximum number of cows. Ranches have the most experience To meet the resource goals, ranchers need to be flexible Forage production varies annually with weather Stocking rates should be flexible to match forage production Maximums set too low can lead to resource degradation including invasive weed and brush proliferation, loss of photosynthetic potential, loss of soil carbon and wildfire fuel loading. Pre-setting of maximum cow numbers removes the ranchers' incentive to manage for improved forage production, including practices that are known to address invasive weeds or sequester atmospheric carbon in rangeland soils. Ranchers should be allowed to process and sell their farm products at the seashore Improve visitor experience More closely demonstrates the historic use of Pt. Reyes. Re-connects the seashore ranchers with the local food community Offers more opportunity to next generation ranchers Is allowed in the Marin Local Coastal Plan Ranchers should be allowed to add farm worker housing There is little affordable housing in West Marin Reduces traffic Historically accurate Difficult for ranchers to interest employees without housing Is allowed in the Marin Local Coastal Plan Elk should be managed per Congressman Huffman's direction in H.R. 6687 that "in areas of agricultural property where Tule Elk present conflicts with working ranches or dairies, the Secretary shall manage the Tule Elk for separation from the working ranches or dairies." Conflicts caused by the elk with existing ranches and dairies include the spread of disease and associated environmental impacts. Both the elk and the cattle can be harmed by disease transfer The elk are damaging ranchers' property and hurting their businesses both in the Drakes Beach area and the Drakes Estero trail areas. The Drakes Beach herd is not the only herd harming the family ranches. The elk have plenty of room at Limantour and Tomales Point with plenty of visitor access The elk are newly introduced and are not part

of the historic character meant to be protected in the pastoral zone. Elk should remain and be protected in wilderness areas. The elk were relocated to the designated elk range in the Limantour wilderness; the Park Service should keep them there and manage that area for elk habitat. Elk within the ranching area are hazed by PRNS staff daily. This is expensive, ineffective and it treats a wild animal as if it is a domestic animal. Elk should be kept in the wilderness areas so they can be free ranging without constant human interference.

#582

Name: Renzas, James

Correspondence: Get the cows off the land and restore natural habitat

#583

Name: Rebarchik, Tanya

Correspondence: I understand that the NPS could consider opening more trails in the Point Reyes National Seashore area to Bikes. As an equestrian and also as someone who cares about trail conditions and safety, I would like to urge you to be very careful about this. Bikers already have access to over 75% of the trails in Marin county. Point Reyes National Seashore has many vulnerable single track trails that would be impacted greatly by bicycle use. Bikes already have access to trails such as Stewart Road and the Olema Valley Trail and the Bear Valley Trail. I think it is very important to preserve some trails, especially single track trails with limited line of sight, for hikers and equestrians, without the threat of conflict with a fast moving bike. The trails in the area already are barely maintained, and bike traffic would make existing erosion issues worse much faster.. Equestrians are becoming more limited as to where we can go already, and Point Reyes National Seashore is one of the major remaining treasures we have. Please help preserve it and dont let bikes on the fragile single track trails. Thank you for your attention.

#584

Name: Berto, Constance

Correspondence: Gentle people: I write as a 60 year resident of Marin County. I have been active in environmental issues since we moved to Marin in 1958. We were friends with the late Boyd Stewart and the late daughter Joanne; we are friends with his granddaughter Amanda. I am a horsewoman, hiker, and a road biker I pedaled five 'centuries' [or 100 miles/day] on my road bike back in the 1970's.) I have hiked up Mt. Whitney; I have over 11,000 miles in endurance competition on my horse of rides of at least 50 miles or more in one day, including having completed the famed Western States 100 Miles (Tevis) over the Sierra. Those are my credentials in the outdoors. Under no, NO, circumstances should more trails be opened, much less built, in Point Reyes National Seashore. The majority of PRNS acreage is in Wilderness Status, which protects the environment and does not permit bicycles except on several designated access roads to the coast and various campsites. No one, bicycle riders included, is prohibited from hiking the narrow trails in PRNS. Just the bicycle is restricted; leave it home and take a walk. Similarly, horss are not allowed on certain trails in PRNS, but the riders are welcome to hike them - - we can just leave the horse back home at its stable. The proposals of MCBC are astonishing in their flippant disregard of nature, wilderness, and the environment. Please deny them in their entirety. Sincerely, Connie Berto

#585

Name: Walstad, Eric

Correspondence: I support and would like to see the completion of the following projects:

A new trail between Devil's Gulch and Platform Bridge through the Cheda, McIsaac, and Zanardi Ranches.

A plan to connect the Cross Marin Trail into Point Reyes.

Adoption of social trails off Bolinas Ridge for better connectivity and a single-track trail experience.

Extend the Olema Valley Trail to Bolinas on the east side of Highway 1.

Close gaps for bikes through ranch lands in the park, including closing the Estero Trail loop, connecting Sir Francis Drake Blvd. with Pierce Point Road, and connecting Marshall Beach to Pierce Point Road,

A more bike-friendly permit application process for road and mountain bike events in the park, including along Bolinas Ridge and out to the lighthouse.

Bike access to all ranch roads in the pastoral zone that are already open to pedestrians.

#586

Name: Tanklage, Lyndie

Correspondence: Not a good idea to have bikes in Pt Reyes, for the mere fact that greater than 90% of the trails, ARE SINGLE TRACKED! For the most part, bicyclists are rude & inconsiderate to equestrians. The bikers main, & only desire is to go as fast as they can, Devil May Care! So, imagine the wrecks there will be...the reality of how long it will be for EMS to get to & access the scene, will be monumental! In the world of trauma, which I have been a part of, as an RN, there is a Golden Rule, you have 1 Golden Hour to reach a Trauma Center. This is not even mentioning the mechanical means of extricating the horses, from a trauma scene. Not to mention that most cell phones dont work anywhere in the park. Is Point Reyes National Seashore? I dont think so. If you decide to have the bicyclists in the Park, on the single track trails, I will no longer ride. Give it to the bicyclists, see how it goes with the hikers, the children. Regretful to have to be sharing my personal & professional opinions. Lyndie Tanklage

#587

Name: Lawson, Gregory

Correspondence: I'm so glad I am retired from the NPS. The current leadership of the Interior Department makes me ashamed. The mission has been forgotten.

#588

Name: Cabrera-Borloz, Maribel

Correspondence: We are overpopulated with cattles, animals farms ranch etc. The more the more greedy cattle farmers are! Enough with the abused of the animal farms. Plus we need to do our best to preserve and maintain this small population of Elks. Please for the new generation keep the Elks. Thank you

#589

Name: N/A, N/A

Correspondence: I hope you guys do whatever you can to save the tule elk.

#590

Name: N/A, david

Correspondence: I am an active cyclist in the North Bay and I am writing to ask you to make the following cycling improvements to the Pt. Reyes National Seashore. Create a new trail between Devil's Gulch and Platform Bridge through the Cheda, McIsaac, and Zanardi Ranches.

Make a plan to connect the Cross Marin Trail into Point Reyes.

Adopt social trails off Bolinas Ridge for better connectivity and a single-track trail experience.

Extend the Olema Valley Trail to Bolinas on the east side of Highway 1.

Close gaps for bikes through ranch lands in the park, including closing the Estero Trail loop, connecting Sir Francis Drake Blvd. with Pierce Point Road, and connecting Marshall Beach to Pierce Point Road,

Implement a more bike-friendly permit application process for road and mountain bike events in the park, including along Bolinas Ridge and out to the lighthouse.

Allow bike access to all ranch roads in the pastoral zone that are already open to pedestrians.

#591

Name: Fedorov, Karen

Correspondence: PLEASE, please do not displace the rare elk to allow cattle grazing to yet again cause a species to die out. Leave the wild animals in their traditional grazing lands. We DO NOT have to right to despoil everything on earth to feed the greed of people.

#592

Name: Acosta, Manuel

Correspondence: Would love to see the following.

A new trail between Devil's Gulch and Platform Bridge through the Cheda, McIsaac, and Zanardi Ranches.

A plan to connect the Cross Marin Trail into Point Reyes.

Adoption of social trails off Bolinas Ridge for better connectivity and a single-track trail experience.

Extend the Olema Valley Trail to Bolinas on the east side of Highway 1.

Close gaps for bikes through ranch lands in the park, including closing the Estero Trail loop, connecting Sir Francis Drake Blvd. with Pierce Point Road, and connecting Marshall Beach to Pierce Point Road,

A more bike-friendly permit application process for road and mountain bike events in the park, including along Bolinas Ridge and out to the lighthouse.

Bike access to all ranch roads in the pastoral zone that are already open to pedestrians.

#593

Name: Fawcett, Susan

Correspondence: No cows in Point Reyes, please. The public and visitors come for elk and native vegetation, not welfare ranches that operate at the expense of wildlife!

#594

Name: Wells, Carol

Correspondence: Agriculture of cattle is one of the most destructive practices on earth. The amount of resources it takes to raise one cow could feed families for months on a plant based diet. These deer have been in this area and are natural to it. They may not do well in a new area and the land may not recover from destructive cattle grazing. This is a lose lose situation. Leave the deer where they are and begin an effort towards reducing livestock.

#595

Name: Catalano, Sési

Correspondence: I am writing to express my strong opposition to opening up more of Pt. Reyes National Seashore to mountain bikes. Mountain biking is already allowed on the majority of trails in and around the area, leaving few trails for those who want to enjoy the slower pace and safety of trails free from all too often speeding mountain bikers. For hikers and equestrians it can be disconcerting, and more important, potentially dangerous to encounter mountain bikes particularly on steep, narrow trails as are found in Pt. Reyes National Seashore. Not all trails are suitable for multi-use, and opening more trails to mountain bikes will only serve to push other users off of the trails they have already migrated to to avoid encounters with mountain bikes. As someone who grew up enjoying hiking and horseback riding in Pt. Reyes, and who also mountain bikes, I firmly believe that reserving some trails for restricted use enhances the park experience for all.

#596

Name: Bunce, Richard

Correspondence: Public Comment Submission by Dick Bunce, resident of Berkeley, constant visitor to Point Reyes since 1973, former Director of Development and Marketing for the Golden Gate National Parks Conservancy (retired) and currently on the Board of Directors of the Point Reyes National Seashore Association.

North-South Hiking Trail [NST]

The Final EIS for the GMP Amendment should commit the National Park Service to develop a hiking trail designed to link the entire park with a non-motorized route. This North-South Trail [NST] should be designed to link the Estero Trailhead in the center of the park with resources to the north which are not currently accessible except by car. The principal northern destination resources for a proposed NST should be (1) the western Tomales Bay shoreline [including Tomales Bay State Park]; (2) Pierce Point Ranch, the Tomales Point Trail, McClures Beach, and the Tule Elk reserve; and (3) Abbotts Lagoon, and the Pacific Ocean coastal beaches that are accessible north and south of the Abbotts Lagoon area [Kehoe, North and South beaches].

A North-South Trail designed with these destinations would make virtually the entire Point Reyes National Seashore accessible to walkers - for the first time in its history.

There exists an extensive trail network south and east of the Estero Trailhead providing access to the Philip Burton Wilderness Area, the Bear Valley Visitor Center, three backpacking campgrounds [Coast Camp, Sky Camp and Wildcat Camp], an overnight Hostel [Laguna complex], the cabins and meeting/dining facilities at the Clem Miller Environmental Education Center, the southernmost extent of the park [Palomarin Trailhead] and trail connectivity to adjacent public lands on the Bolinas Ridge Trail. A North-South connector would make virtually all the park's southern resources available to hikers from the north, and vice-versa.

Alignments

The Point Reyes trail system as it exists today is largely the legacy route of ranch roads re-purposed as hiking trails, for purposes of expediency and efficiency. Earlier trail studies [Trail Inventory and Condition Assessment with Recommendations, Point Reyes National Seashore, November 2003, Doug Nadeau and Parsons/Brinkerhoff, preparers] make clear the environmental failings of these transit routes, the unsustainable

maintenance problems [and costs] that endure, and the failure of such re-born ranch roads to introduce the walker to the interpretive richness of the peninsula – geologically, biologically and culturally.

Principles for planning an NST should include: • Adherence to the California Coastal Trail alignment. Since passage of the Coastal Act of 1976, California has sought through planning, land acquisition and funding, to create a 1,300-mile coastal hiking trail. The plan for Point Reyes National Seashore specifies a route leading from the Tomales Point railhead to the western shoreline of Tomales Bay roughly at White Gulch Beach and thereafter south along the Tomales Bay shore to at least Marshall Beach. • Integrity. The walking trail should be continuous and not compromised by motorized vehicles. • Connectivity. The trail should effectively link starting points with destinations, creating a trail with appeal to draw visitors out of their cars. • Respect. The alignment should have a healthy regard for the protection of natural habitats, cultural and archeological features and avoid interference with agricultural operations. • Feasibility. Balancing timely implementation and yet breaking with the legacy of ranch roads reborn as trails, may mean compromises that yield high value, new trail segments interrupted with efficient sections, and considering the prospect of retiring certain trails in the park to enable trail crews to maintain this new trail with no net overall trail mileage. • Process. Ideally a Trail Planning Charette and a Ranchlands Visitor Experience Program Charette should be initiated. Point Reyes National Seashore deserves a first-class trail system and a planning process that invites the most current thinking in visitor access, resource protection, engineering and expertise in trail design, which will advance the likelihood of securing funding for implementation from NPS and private philanthropic sources.

Preferred alignment possibilities include: • Following the California Coastal Trail recommended route from Pierce Point Ranch to Marshall Beach. • Continuing a coastal route from Marshall Beach to Lairds Landing to capture the cultural history of that location. Trails exist from both Marshall Beach and Laird's Landing to L Ranch Road. • L Ranch Road in 2.6 miles links both the Marshall Beach and Lairds Landing trails to Pierce Point Road. • Alternatively, a continuous Tomales Bay shoreline alignment is possible through Duck Cove and the trails of Tomales Bay State Park, with the Jepson Trail leading from Tomales Bay up to the parking area at Pierce Point Road 0.2 miles from the L Ranch Road intersection with Pierce Point Road • Adjacent M Ranch has a network of ranch "tracks" beginning just south of Pierce Point Road that nearly link to a similar network within D Rogers Ranch which together traverse the distance between the Jepson Trailhead at Pierce Point Ranch Road to Sir Francis Drake Boulevard at the Estero Trail access road - - only a mile from the Estero Trailhead. • A new trail up over the rise from Sir Francis Drake Boulevard to the Estero Trailhead.

Alternative Alignment • A Bluff Trail (new) originating from Pierce Point Ranch, south across the bluffs overlooking the Pacific, and successfully traversing Chute Gulch, then dropping west to enter the beach through a canyon just north of Kehoe Beach proper. • A trail linking the Kehoe Beach Trailhead with L Ranch Road and crossing J Ranch/K Ranch would then follow the alignment described above from its intersection with L Ranch Road to the Estero Trailhead.

Opportunities to Expand Overnight Accommodations in the Planning Area

The Final EIS for the GMP Amendment should commit the National Park Service to develop low-cost overnight accommodations in the planning area that provide an outdoor visitor experience. These accommodations could include facilities for backpackers walking the North-South Trail, families, young people participating in PRNSA's environmental education summer camps and school-year programs, campers and long-distance walkers who are not backpacking. These visitors could be accommodated through car-camping campgrounds, tent cabin campgrounds, hostels, home stays on ranch houses and a backcountry campground in the planning area.

Low-Cost Overnight Accommodations Need

Protection of the coast at Point Reyes must be coupled with guarantees of access to enjoyment of the coast. Presently there is a scarcity of overnight accommodations for lower and middle-income individuals and families at Point Reyes. As documented in Explore the Coast Overnight, Coastal Conservancy, State of California, November 2018, lower and middle-income households, people of color, and young people are less likely than higher-income,

white, or older Californians to stay overnight at the California coast. Financial reasons are the most common barrier cited.

Camping costs significantly less than commercial lodging and Airbnb-style accommodations and provides a unique outdoor coastal experience at a low cost. There are no car camping facilities currently in the Point Reyes National Seashore, which limits access to the full recreational, educational and spiritual experience of this national parkland.

Cabins, yurts, tent cabins, and similar structures offer an option somewhere between tent camping and commercial lodging. They provide privacy and a protected space from the weather. They range from simple accommodations with minimal amenities, such as a sleeping platform and communal bathroom, to accommodations with a mattress, electricity, lighting. Because they provide shelter and some furniture, cabins and yurts typically require less equipment than traditional camping. The Parks Forward Initiative of California's Department of Parks and Recreation sponsored a design competition for pre-fab cabins for adoption in parklands, which produced The Wedge, suitable for family overnights. Currently installed in Big Sur, Angel Island and Sonoma County Parks among others, The Wedge offers low cost in-park overnight access and is wildly popular. No tent cabins or cabins are currently available within Point Reyes National Seashore, though installation of these would be inexpensive, especially at ranchlands without current ranching or residential use. Tent cabins can be installed seasonally, if necessary. Cabins like The Wedge can be installed as "portables" with advantages for zoning requirements and other flexible features. Hostel International operates a related facility two miles from the coast with gender-specific dorm rooms, shared bath and kitchen facilities and 4 family rooms with private baths.

PRNSA's youth environmental education programs, both school-year programs and summer camp programs, currently operate at maximum capacity year-round, constrained by existing campground and bunkhouse [Clem Miller Center] limitations. There are tremendous waiting lists for youth summer camps; and the maxed-out capacity for school-year programs results in turning down many, many school groups seeking the opportunity for deep connections with the natural and cultural offerings of Point Reyes lands. All NPS backcountry campsites are fully booked during the summer. A tent cabin campground for youth programs with either porta-potty or pit toilets should be located in the park's ranchlands to afford youth environmental education programs access to additional natural and cultural resources since the Clem Miller Environmental Education Center is located in the southern region with access to that trail complex and resources. Opportunistic Sites

The best locations for inside-the-park car campgrounds are:

- D Ranch [not occupied] on the bluffs above Drakes Estero. With the Ken Patrick Visitor Center and store barely a mile away by road, provisions for camping would be readily available and the Visitor Center could host interpretive activities for the campground occupants. Campers would have access to whale-watching at the Lighthouse and the Elephant Seal Overlook via shuttle bus during the season, and - - with a short trail – easy access to Drakes Beach. A second short trail to Drakes Estero shoreline could provide access there, and a kayak-in camping opportunity. Few sites in the Seashore offer as many natural and recreational opportunities as D Ranch and its vacant status makes it perfect for re-purposing as the Park's first car campground.
- Pierce Point Ranch [unoccupied, historic district]. Challenging weather would make tent cabins or The Wedge style cabins ideal for addition to the Pierce Point Ranch site, providing overnight accommodations for backpackers traversing the Park [on the new North-South trail complex], youth participating in Point Reyes National Seashore Association's environmental education programs [both summer and school-year] and family car campers. The site provides ready access to the natural areas via the Tomales Point Trail, the Tule Elk preserve, McClures Beach, and with it, the opportunity to introduce new interpretive programs about ranching and its history at Point Reyes. The backcountry campgrounds, visitor centers, hostel and the Clem Miller Environmental Education Center are all in the southern portion of the park; this site provides better access for visitors to explore the park's northern district.
- The former oyster farm development on Schooner Bay/Drakes Estero could be a site for car camping, tent cabins or cabins, with marine wilderness access and marine science interpretive opportunities, and the opportunity for a kayaking campground [outside of pupping season]. With a short trail connecting the site to the Estero Trail, this site would gain hiking access to all parts of the park [after completion of the North-South trail] and could be used by backpackers traversing the park and

youth participating in PRNSA's environmental education programs [summer and school-year] and backpacking camps. Its location barely 3 miles inside the park boundary from the private Inverness community also makes it more accessible than sites deeper in the park and accessible to the town's stores for camping provisions.

Prospective Funding

The California State Coastal Conservancy has announced a grants program to fund planning and capital construction costs for low coast overnight accommodations along California's coast. Projects that will create campgrounds, cabins, and hostels are the goal of this program which will draw \$30 million from Proposition 68 (2018) funds and from other sources. Proposals will be accepted in 2019 and grantmaking will extend for several years. Hosteling International's 4 family rooms at its Point Reyes Laguna complex received earlier support from a related Coastal Conservancy program. The current program document Explore the Coast Overnight [Coastal Conservancy, State of California, November 2018] identifies four "Potential Project Ideas" for funding at Point Reyes: (1) Historic Lifeboat Station Complex; (2) Bear Valley Complex Campground; (3) 48 boat-in and hike-in campsites at various locations; (4) Laguna Complex. Partnering with the Point Reyes National Seashore Association in applying for funding from the Coastal Conservancy is a promising funding strategy for these or any other sites I've proposed.

#597

Name: N/A, N/A

Correspondence: Hi, I want to submit opinion on how great of an idea it is to open more back country to cyclists. There are groups of cyclists always looking for this type of route and land to ride on and this can stand to be a great addition to the rich bay area cycling. I am also in agreement with what the local bicycle advocate organization MCBC in stating these keys:

A new trail between Devil's Gulch and Platform Bridge through Cheda, McIsaac and Zanardi Ranch.

A plan to connect the Cross Marin Trail into Point Reyes.

Adoption of social trails off Bolinas Ridge for better connectivity and a single-track trail experience.

Extend the Olema Valley Trail to Bolinas on the east side of Highway 1.

Close gaps for bikes through ranch lands in the park, including closing the Estero Trail loop, connecting Sir Francis Drake Blvd. with Pierce Point Road and connecting Marshall Beach to Pierce Point Road,

A more bike-friendly permit application process for road and mountain bike events in the park, including along Bolinas Ridge and out to the lighthouse.

Bike access to all ranch roads in the pastoral zone that are already open to pedestrians.

#598

Name: Jackson, Tory

Correspondence: I would like to express my support for the following improvements for the Point Reyes National Seashore pertaining to BICYCLING ACCESS ON OUR PUBLIC LANDS IN PT. REYES NATIONAL SEASHORE

A new trail between Devil's Gulch and Platform Bridge through the Cheda, McIsaac, and Zanardi Ranches.

A plan to connect the Cross Marin Trail into Point Reyes.

Adoption of social trails off Bolinas Ridge for better connectivity and a single-track trail experience.

Extend the Olema Valley Trail to Bolinas on the east side of Highway 1.

Close gaps for bikes through ranch lands in the park, including closing the Estero Trail loop, connecting Sir Francis Drake Blvd. with Pierce Point Road, and connecting Marshall Beach to Pierce Point Road,

A more bike-friendly permit application process for road and mountain bike events in the park, including along Bolinas Ridge and out to the lighthouse.

Bike access to all ranch roads in the pastoral zone that are already open to pedestrians.

Thank you for keeping our lands safe and public!!

#599

Name: N/A, N/A

Correspondence: I am writing to request that you not open the Point Reyes trails currently reserved for hikers and equestrians too cyclists. Bicycles present a serious safety problem for equestrians, and the speed with which they travel can also be a problem for hikers. Furthermore, they tend to causes deep ruts on the trails.

Thank you for your consideration.

#600

Name: Flaherty, Larie

Correspondence: Natural vs commercial, science always wins. Let's not be part of the problem. Did you not just read the climate report? Let us be informed and proud of the decisions we make today and what that means for the future in global terms not for today in political or monetary gain. We are better than this.

#601

Name: Lefler, Susan

Correspondence: Stop allowing cattle ranching and grazing and start restoring habitat for wildlife. These are our public lands and should not be used for private people raising and grazing cattle. We want wildlife restored to these lands.

#602

Name: N/A, N/A

Correspondence: I support something most closely resembling Alternative B.

The ranching community is, to a large extent, responsible for the very existence of the Seashore. Great pressure from development interests was placed upon the landowners when discussion about creating a park began. Some of the earliest dealings between the government and individual landowners led to valuations of properties that would dramatically increase their property tax; a harrowing prospect for a dairy. Without knowing if they would be able to work the land again, the ranchers agreed preserving the open nature of their peninsula was more important and unanimously agreed to the selling to the government.

"While Point Reyes National Seashore was created to provide recreation space, it did so only with an explicit commitment to retain active agricultural uses." Excerpt From: Laura Alice Watt. "The Paradox of Preservation."

The first part of this quote gets at the heart of the fallacy that anti-ranching contingencies use as their reasoning for eliminating agriculture . The Parks are not pristine natural preserves. They are created to be used. Human recreation has impacts to parallel agriculture. And elk will continue to be “managed” no matter which alternative is chosen.

Human use in a park is seen as other. But ranchers make this park what it is. If we were just to clear out this barn and restore that lagoon site soon a beautifully storied landscape would become filled with coyote bush, the potential for a special few to know the land in a way other than tourism would vanish.

I am for a scientific approach to managing the agricultural operations in the pastoral zone. Eliminating or keeping at bay exotic and invasive plants such as Romulea, is important to me. Learning how to use livestock AND elk to achieve restoration and conservation goals would be very valuable. What if we could improve the ecosystems, support small scale farmers, support the local economy and humanely manage the elk population? Allowing the ranchers to stay with increased engagement from the Park, the scientific community and the ranching community in a relationship that values what each element has to offer is our best hope for a future where we can address and overcome the problems that we will inevitably face.

#603

Name: N/A, N/A

Correspondence: I support continued ranching and dairying in the planning area. Alternative B

The Planning Area should be used and seen as a laboratory for range management. The Park Service should consider, from an ecological perspective, the cattle as one population and make decisions based on that understanding. The elk should be seen as the Park Service's herd. Decisions on culling should be reached based off a planning area-wide grazing plan that coordinates with operators in the interest of ecosystem health. A percentage of each ranch that elk inhabit could then be calculated for elk use and lease fees adjusted accordingly and grazing monitoring could account for that. The Park Service should maintain some level of control to manage and rest pastures as part of a planning area-wide grazing plan. The Park Service and operators should consider the ecological and economic implications of running all the cattle as one herd. Operators should be required, encouraged or incentivized to develop holistic management plans that focus on ecosystem health, pasture rotation, soil building and native biodiversity. Operators who willingly participate in experiments including grazing regimes, breed selection and using elk as part of holistic grazing practice should be publicly commended and potentially rewarded.

The public should be kept apprised of all management methods and decisions. Resources and scholarly articles should be made easily accessible regarding the role of grazing in coastal prairie and California annual grasslands. A webpage should be made and outreach should focus on educating the public about the financial realities of managing the land, the elk and the infrastructure without operators. Operators who would like to host school groups and educational tours should be publicly commended or potentially rewarded.

#604

Name: N/A, N/A

Correspondence: I support Alternative B. The blow to the larger agricultural community in Marin and Sonoma will be significant, especially in a time when small farms and dairies in particular are being lost at an alarming rate. Family owned farms keep more money in the community than almost any other enterprise. Agriculture keeps the land out of development and the amount of developed land that has come back to farming is negligible. Farming and environmental causes are compatible and often farmers know more about landscapes than anyone else. If the 24 families are forced out of PRNS we will have lost a legacy and a richness of culture European- Americans are just beginning to attain in California. It is part of the mandate of the NPS to protect the cultural heritage of the land.

#605

Name: Holmes, Christine

Correspondence: I am strongly against killing Tule Elk on the Point Reyes National Seashore in order to make more grazing land for cattle. This works directly against the decade-long successful reintroduction of a native species into national parkland, just to benefit families who say they can't accommodate the elk in any other way. Ranchers will push for all the grazing land they can get; they do not care about the native species or wild nature of the land. If there is a conflict for resources, the resources should be maintained for the wild species, not for a profit-making entity. I love Point Reyes, was just out there yesterday, and the pastoral combination of ranch and nature is a unique part of it. But if there is a conflict on national parkland between man and nature, the NPS must weigh in on the side of nature. To do otherwise is to sabotage the beauty and peace of a place that is sacred to many. Killing those sensitive animals would be a travesty and ruin the serenity of the place. I could not go back to Pt. Reyes for a long time after the NPS let elk die of thirst during the drought, only because they were fenced and could not get to water. Such cavalier cruelty, whether active or passive it was NPS responsibility. The number of ranches and/or size of the ranch operations must be reduced if there is a conflict with wildlife. In fact, the cattle graze near the beaches, which is polluting and they should be fenced in far away from anyplace where aquatic or seabird species may frequent. The ranches are already showing disrespect for the natural environment and the animals that inhabit it. Please fight to keep killing out of Pt. Reyes, including by Native Americans. I will never be able to go back and enjoy that beautiful place if the elk are killed. Please don't let profit-making spoil the serenity of this sacred place. Sincerely, Christine Holmes

#606

Name: Bartlebaugh, Scott

Correspondence: I support the following:

A new trail between Devil's Gulch and Platform Bridge through the Cheda, McIsaac, and Zanardi Ranches.

A plan to connect the Cross Marin Trail into Point Reyes.

Adoption of social trails off Bolinas Ridge for better connectivity and a single-track trail experience.

Extend the Olema Valley Trail to Bolinas on the east side of Highway 1.

Close gaps for bikes through ranch lands in the park, including closing the Estero Trail loop, connecting Sir Francis Drake Blvd. with Pierce Point Road, and connecting Marshall Beach to Pierce Point Road,

A more bike-friendly permit application process for road and mountain bike events in the park, including along Bolinas Ridge and out to the lighthouse.

Bike access to all ranch roads in the pastoral zone that are already open to pedestrians.

#607

Name: Harrison, Marilyn

Correspondence: Please support the Tule Elk to sustain a healthy ecosystem. Ranching is detrimental to the environment and we need to do everything we can to encourage a sound ecological system.

#608

Name: Prior, Dennis

Correspondence: I enjoy cycling in the North Bay and I am writing to ask you to make the following cycling improvements to the Pt. Reyes National Seashore.

1. Create a new trail between Devil's Gulch and Platform Bridge through the Cheda, McIsaac, and Zanardi Ranches.
2. Make a plan to connect the Cross Marin Trail into Point Reyes.
3. Adopt social trails off Bolinas Ridge for better connectivity and a single-track trail experience.
4. Extend the Olema Valley Trail to Bolinas on the east side of Highway 1.
5. Close gaps for bikes through ranch lands in the park, including closing the Estero Trail loop, connecting Sir Francis Drake Blvd. with Pierce Point Road, and connecting Marshall Beach to Pierce Point Road.
6. Implement a more bike-friendly permit application process for road and mountain bike events in the park, including along Bolinas Ridge and out to the lighthouse.
7. Allow bike access to all ranch roads in the pastoral zone that are already open to pedestrians.

Thank you for your kind consideration.

Sincerely, Dennis Prior

#609

Name: Nguyen, Megan

Correspondence: I support the bike trail access expansion plan. Thank you. Megan Nguyen

#610

Name: Meier, Donna

Correspondence: Please, please, PLEASE think long and hard about opening the Wilderness area of Pt. Reyes National Seashore to the mountain bike community. Mixing mechanical machines with an animal is the perfect recipe for disaster. The speed of traveling on these machines is exponentially greater than the animal. The animal; horse, mule or pony, would be at risk around every corner. That should be of grave concern to the Park Service. Thanks for reading.

#611

Name: Fletcher, Morgan

Correspondence: I support these bicycling projects, as advocated for by the Marin County Bicycling Association:

A new trail between Devil's Gulch and Platform Bridge through the Cheda, McIsaac, and Zanardi Ranches.

A plan to connect the Cross Marin Trail into Point Reyes.

Adoption of social trails off Bolinas Ridge for better connectivity and a single-track trail experience.

Extend the Olema Valley Trail to Bolinas on the east side of Highway 1.

Close gaps for bikes through ranch lands in the park, including closing the Estero Trail loop, connecting Sir Francis Drake Blvd. with Pierce Point Road, and connecting Marshall Beach to Pierce Point Road,

A more bike-friendly permit application process for road and mountain bike events in the park, including along Bolinas Ridge and out to the lighthouse.

Bike access to all ranch roads in the pastoral zone that are already open to pedestrians.

Morgan

#612

Name: Connolly, Damon

Correspondence: November 26, 2018

Point Reyes GMP Amendment EIS Cecily Muldoon Superintendent Point Reyes GMP Amendment Point Reyes National Seashore 1 Bear Valley Road Point Reyes Station, CA 94956

Subject: Scoping Comments on the Point Reyes National Seashore General Management Plan Amendment and Environmental Impact Statement

Dear Superintendent Muldoon:

The County of Marin has anticipated and embraces the Notice of Intent to complete an Environmental Impact Statement (EIS) for the General Management Plan Amendment (GMP Amendment) for the Point Reyes National Seashore (PRNS) and north district of Golden Gate National Recreation Area (GGNRA) as a seminal opportunity, and our responsibility, to again fully partner with the National Park Service (NPS). Through our combined leadership we can secure West Marins open and connected landscape for the fundamental, integrated and necessary role of human communities in the environment.

Marin County agriculture is recognized as a leader in Californias agricultural sustainability movement and local food security. Farming and ranching in PRNS and GGNRA contributes to the stability of our entire County of Marin farm system. Point Reyes National Seashore ranches and dairies account for nearly 20% (\$17.8 million) 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 \$71.2 million.

The Marin County Board of Supervisors considers it a privilege to continue the legacy of our predecessor, Peter Behr. Through his leadership and collaboration with many instrumental partners, PRNS and GGNRA came into existence. Paralleling the steps and actions taken to make this possible are Marin Countys precedent-setting land use policy actions to preserve Marins complementing private agricultural lands and strategically supporting their viability through diversification in agricultural production in our Countywide Plan . We have put these policies in place for the same purpose and goal that there is ranching on PRNS and GGNRA - that is, to support and embrace sustainable, viable and environmentally-friendly farming that protects West Marins land and water endowment and the history of its agricultural community.

Accordingly, we express our full and unequivocal support for the continuation of viable livestock grazing, dairy production and diversified agriculture on the fullest expanse of PRNS and GGNRA pastoral area. The following specific comments are provided for consideration in the identification of what should be analyzed through the EIS.

Specific Comments

1. EIS analysis should include and account for the detailed and specific range management program activities, terms and conditions met by the ranches, including compliance with San Francisco Regional Water Quality Control Boards water quality regulations for grazing livestock and dairy operations. 2. EIS analysis of the proposed action and alternatives consider the connections and incorporate the options for solving management issues that exist across the planning area boundary. The connections between the GMP Amendment planning area with other portions of PRNS and GGNRA and the broader region are strong. The six dairies in the planning area are 20% of Marins remaining dairy farms, shipping to local dairy processors such as Straus Family Creamery and Clover Sonoma. The free-range elk in the planning area originated from the herd in the adjacent Wilderness and are influenced by resource conditions there. Visitor experiences and opportunities are among the menu of options across the entire Seashore with the quality and extent of road, parking and trail networks influencing access to these options. 3. In analyzing and refining the GMP Amendment proposed action and other alternatives in the EIS analysis, the farmers and ranchers role as managers should be elevated as they represent the most direct connection to and provide the management needed to maintain and enhance the pastoral cultural landscape of PRNS and GGNRA. Marin is now fully understanding and benefiting from the critical role ranchers and farmers have as partners in achieving our shared goals. 4. Analyze in the EIS the benefits that ranching contributes to community well-being. We value the many benefits to our community that working ranches and farms provide, such as creating and contributing to enrollment and participation in our schools, churches and other important organizations. 5. Diversification on the PRNS and GGNRA ranches and dairies should be fully analyzed in the EIS proposed action and alternative so that it can be facilitated going forward. This includes selected crop production, forage production, farm sales, farm processing, farm stays and farm tours in and beyond the 2.5 acres proposed in the Ranch Core Land Management Unit. Diversification is a proven tool for the economic viability of both individual ranches and the broader community and it is a recognized and supported tenant in the Marin Countywide Plan. Diversification has enabled Marins small and medium sized farms to be economically viable, build additional resiliency, and to avert the risks of business failure. This is especially important because these ranches do not benefit from economies of scale that larger operations enjoy. In effect, diversification has strengthened Marins local family farms, local economy, local food systems, and ever-changing environmental conditions. 6. To make the proposed action and other studied alternatives stronger and successful in realizing the mutual benefits of working farms and ranches, include in the EIS guidelines to facilitate ranches and NPS making real-time operational decisions. This is the operational flexibility that the field-level partnership between the ranchers and staff require to be successful. The absence of clear guidance for agricultural operations hinders the decision-making ability of the rancher and NPS staff on-the-ground relationships. The needs to repair fences, re-roof barns and manage invasive plants are a few examples of operational decisions that often are delayed. These delays have had financial and ecological impacts. 7. Analysis of the proposed action and alternatives should include partnership with local organizations that increase the ability to implement integrated farm production and environmental stewardship solutions. Marin has enjoyed and benefited from a broad partnership of agricultural support organizations. This has included Marin County departments such as the Agricultural Department, Community Development Agency, and Cooperative Extension. Federal agencies such as the United States Department of Agriculture Natural Resources Conservation Service and the National Organic Program are integral to this partnership. So too are community-based organizations like the Agricultural Institute of Marin, Marin Agricultural Land Trust, and Marin Resource Conservation District. This partnership has provided the combined, complementing missions and expertise in land use policy, agricultural and natural resource management, marketing and outreach, and education to accomplish precedent setting land conservation, environmental stewardship projects, and value-added farm production. PRNS and GGNRA Staff and ranches have been collaborators and partners on these innovations and accomplishments and should be encouraged do so going forward. 8. EIS analysis should integrate Marin Countys Climate Action Plan Update and Drawdown Marin. Marin agriculture has demonstrated that it can be an important part of the solution to climate change through carbon farming and carbon offsets. An entire chapter was dedicated to agriculture in the Action Plan including the beneficial role of carbon farm plans. 9. When formulating the conservation framework and Land Management Units (LMU), EIS should provide transparency on the process and information used, including rancher input, for determining the locations, acreages, and authorized land uses. The previous four comments on diversification, operational decision making, local and agency organization partnerships, and Marin climate initiatives, should also be integrated into analysis and development of any conservation framework and land use management definitions and determinations. This will make available to the framework development and implementation the complementing expertise and resources needed to be successful in accomplishing the

frameworks goal to protect natural and cultural resources. 10. EIS analysis should incorporate into the conservation framework and LMUs flexibility to address problems and take advantage of opportunities that may cross the LMU boundaries. This may include invasive weeds, specific habitat, and agricultural diversification that would cross boundaries. There is a need for flexibility across LMUs to address problems and realize solutions consistently with effective practices and to avoid impactful discontinuity in management from one LMU to another. 11. EIS analysis should include how agricultural diversification can be part of ranches without a developed complex or rancher occupied buildings. Those ranches represent real opportunities to advance the shared goal of natural and cultural resource protection that could be achieved through activities proposed for the Ranch Core LMU. 12. EIS analysis should include in the proposed action and considered alternatives a plan for operational succession to new members of existing farm families and alternative agricultural candidates if that option is not presented. This should include a plan for continuation after the proposed 20-year leases through lease extensions or renewals. Succession is critical for the perpetuity of agricultures management and stewardship contributions. Marin has benefited through the successful farm transition from one generation to the next across as many as five family generations. Additionally, hand-offs of agricultural property and operations to non-family members have been successful with agricultural production and environmental stewardship persisting. We hold successful succession from current to future agriculturalists fundamental for the continuation of Marins valued pastoral landscapes. 13. The proposed action and analysis of alternatives should include minimal allowance for commingling resource use and management objectives between ranching activities and any free-range elk, including to the maximum extent possible the separation of Elk from working ranches and dairies. When Elk are found in Pastoral Zones, management methods should be used to address their impacts. Wilderness designated lands and Pastoral/Ranch leased lands should be given equal protection corresponding to their intended use and purpose. 14. Analyze and prepare a comprehensive elk management element. The time and resources allocated to conduct this GMP Amendment and corresponding EIS will not easily be garnered again. All the more reason to fully prepare for Elk management contingencies of all free-range elk. This includes the Drakes Beach herd, Limantour herd and any additional herds that form. It also includes the need to manage agriculture that is affected and contingent NPS responses and coordination when elk leave the planning area to access land throughout Marin. In other words, conduct the analysis and have a plan with effective measures and practices laid out so as to avoid the inability to respond to Elk conflicts presented by the 1998 NPS Elk Management Plan. 15. Analyze and prepare a comprehensive housing element. This should include a complete inventory of existing housing, including current uses and conditions, as well as number of vacant uses. The adequacy and affordability of housing available to agricultural workers should also be analyzed, including quality and safety of existing homes. Demand for housing generated by ranches and where this could be met, should be evaluated.

Closure

The GMP Amendment presents an important opportunity to celebrate the outcomes and endowment resulting from decisions made more than 50 years ago. We can do this best by reaffirming our commitment to an evolved understanding of humans fundamental role in the environment, exemplified by all of Marins working ranches and farms. We stand ready with the NPS, PRNS and GGNRA ranchers and farmers, and Marins broader community to achieve this shared goal.

Respectfully,

Damon Connolly, President Marin County Board of Supervisors

#613

Name: Styer, Katie

Correspondence: I support these bicycling projects, as advocated for by the Marin County Bicycle Coalition:

A new trail between Devil's Gulch and Platform Bridge through the Cheda, McIsaac, and Zanardi Ranches.

A plan to connect the Cross Marin Trail into Point Reyes.

Adoption of social trails off Bolinas Ridge for better connectivity and a single-track trail experience.

Extend the Olema Valley Trail to Bolinas on the east side of Highway 1.

Close gaps for bikes through ranch lands in the park, including closing the Estero Trail loop, connecting Sir Francis Drake Blvd. with Pierce Point Road, and connecting Marshall Beach to Pierce Point Road,

A more bike-friendly permit application process for road and mountain bike events in the park, including along Bolinas Ridge and out to the lighthouse.

Bike access to all ranch roads in the pastoral zone that are already open to pedestrians.

Katie

#614

Name: Keller, Patricia

Correspondence: I recently heard that the mountain bikers are trying to gain access to wilderness land in Point Reyes. As a nature lover, hiker, and horseback rider I am totally against this proposal. The mountain bikers have taken over historical horse and hiking trails all over California. They ride fast with head phones on. They have no respect for nature. They are not using the land to enjoy, relax, or reconnect with nature, they use it for their own need for adrenaline. Our wilderness needs to be protected. The animals in the wilderness need protecting. Most hikers and horseback riders are out enjoying the animals, flora, scenes and beauty of our national parks and open spaces, not crashing through them. Enough is enough! Please do not allow mountain bikers to continue to gain access to these precious wilderness spaces so they all of us can enjoy the peacefulness and unhurried gems.

#615

Name: Hartnett , Kendra

Correspondence: I am opposed to opening up Pt. Reyes to bicycles. This is one of the last areas one can go and enjoy the outdoors and escape bikes. We enjoy the peace of being able to hike without the constant concern of being run down. There are many, many trails available to bikes, not all need to be made available. Bikes chew up the trails and cause damage to sensitive areas. Please keep them off the Pt. Reyes trails.

Thank you.

#616

Name: schwarcz, Adam

Correspondence: Hello, while I live in Oakland now, I was raised in Marin and the trail network is very important to me. I still return regularly specifically to continue cycling in the county. I support these bicycling projects, as advocated for by the Marin County Bicycle Coalition:

A new trail between Devil's Gulch and Platform Bridge through the Cheda, McIsaac, and Zanardi Ranches.

A plan to connect the Cross Marin Trail into Point Reyes.

Adoption of social trails off Bolinas Ridge for better connectivity and a single-track trail experience.

Extend the Olema Valley Trail to Bolinas on the east side of Highway 1.

Close gaps for bikes through ranch lands in the park, including closing the Estero Trail loop, connecting Sir Francis Drake Blvd. with Pierce Point Road, and connecting Marshall Beach to Pierce Point Road,

A more bike-friendly permit application process for road and mountain bike events in the park, including along Bolinas Ridge and out to the lighthouse.

Bike access to all ranch roads in the pastoral zone that are already open to pedestrians.

#617

Name: Tandberg , Sarah

Correspondence: With a 30 year history of horse camping and riding at Pt. Reyes National Sea Shore, I would not like to see bicyclists have more access than they do already to the trails. It is not very safe for anyone. Thank you.

#618

Name: N/A, N/A

Correspondence: I'm writing in opposition to mountain bike access to trails in Point Reyes Wilderness Land. Mountain bikes aren't appropriate recreation in wilderness lands. If you let them in, you will find it hard to keep out mountain bikes with motorized assistance (ebikes) - a slippery slope to dirt bikes. Any biking on trails is a disharmonious use and actual danger to other users, particularly small children. Not to mention, mountain biking is a hazard to mountain bikers themselves, resulting in increased trail injuries and requiring expensive rescues on your part. Moreover, mountain biking damages the environment that wilderness areas exist to protect. It causes erosion and other physical damages to land and vegetation that mountain bikers ceaselessly attempt to address by building more and more trails, legally or illegally, with or without your permission. You open a Pandora's Box of troubles for yourself and other trail users if you let mountain bikers in. Please save yourselves and everybody else unnecessary frustration, dissatisfaction, annoyance, physical danger, injuries and environmental damage by just saying no to mountain biking.

#619

Name: Bush , Francois

Correspondence: Pt. Reyes needs more cycling access. Like many national parks and recreation areas, it is too dependant on personal vehicles to get around and explore the park. While the roads are open to cyclists, there is often quite a lot of vehicle traffic which keeps cyclists from feeling safe exploring the area on two wheels. Opening up more of the off-road areas to cyclist would likely help the traffic situation at least a bit, and is a far more healthy alternative for exploring the area (healthy for both people and the park).

#620

Name: Lowe, John

Correspondence: On behalf of Marinwatch, please evaluate the potential for:

(1) reducing the fire fuel load on the eastern side of Highway One in the Olema Valley by restoring grazing to all of the lands in the Olema Valley Historic District, beginning with the area most recently closed to grazing, the Jewel Ranch, using out of the box tools where necessary. E.g., offering the use of the land for free or even subsidizing the work needed to clear the vegetation that has developed and represents a dangerous fire fuel load.

(2) offsetting some or even all of the greenhouse gases resulting from operation of the Park through a focused and comprehensive effort to implement the more than 30 NRCS best management practices on the agricultural lands managed by the Point Reyes National Seashore.

(3) The cost and benefit both financial and to the natural resources in the Park of contracting with the Marin Resource Conservation District to develop carbon farm plans for the agricultural operations in the Park in collaboration with Park staff.

(4) the economic impact on dairy and beef operations of delaying harvest of silage during bird nesting season, the impact on the environment if the agriculturists must haul in feed because of the delay and on the impact on the specific species of bird that would be impacted if the harvest is not delayed, e.g., is it a threatened or endangered species? is it a grassland species that ultimately benefits from having cattle to maintain the grasslands?

#621

Name: LUNDIN, MARY

Correspondence: My husband and I ride our horses at Pt. Reyes every spring and fall. We stay at Stewart's Horse Camp. It has become one of very few areas we can ride without constant vigilance of watching out for speeding bicyclists. It has some very technical trail, trails that aren't suitable for surprise encounters with bikes. Please consider this an area where people go to enjoy the peace and quiet, the plants, the birds, the wilderness. Bikes have a right to enjoy this as well, however many have made this sport into a Indy 500 thrill sport that is fine as long as you aren't on the horse when they approach at high speeds, and some with attitudes that they shouldn't have to temporarily stop their enjoyment to protect the safety of another trail user.

Please keep Pt. Reyes National Seashore bike free. Also remember that places like Stewart's Horse Camp where equestrians can come and ride are few and far between. Most horse camps have about 6 sites, while groups and many riders can enjoy the wonders of Pt. Reyes. Both are a treasure that equestrians are losing quickly.

#622

Name: Weisz, David

Correspondence: As a frequent user of area parks (camping, hiking, cycling), I would like to offer support for a number of projects in your area that would improve overall access and utility of the area specifically for cycling.

1. A new trail between Devil's Gulch and Platform Bridge through the Cheda, McIsaac, and Zanardi Ranches.
2. A plan to connect the Cross Marin Trail into Point Reyes.
3. Adoption of social trails off Bolinas Ridge for better connectivity and a single-track trail experience.
4. Extend the Olema Valley Trail to Bolinas on the east side of Highway 1.
5. Close gaps for bikes through ranch lands in the park, including closing the Estero Trail loop, connecting Sir Francis Drake Blvd. with Pierce Point Road, and connecting Marshall Beach to Pierce Point Road,
6. A more bike-friendly permit application process for road and mountain bike events in the park, including along Bolinas Ridge and out to the lighthouse.
7. Bike access to all ranch roads in the pastoral zone that are already open to pedestrians.

#623

Name: Thompson , Katherine

Correspondence: I support new and improved trails, including mountain bike, in the park.

#624

Name: N/A, N/A

Correspondence: I would like to quote from "Stewardship Begins With People" , a publication from National Park Service U.S. Department of the Interior, Conservation Study Institute, number 14, 2007. "The Point Reyes peninsula has long been associated with the early history of dairy farming in California...A number of the ranches in the park's pastoral zone have been in continuous operation since the 1860s....Here is a place that can reconnect people with their natural heritage through wilderness and recreational experiences as well as with the food they eat, the beauty of the cultural landscapes where it is grown, and the honorable labor of producing it." (The article also addressed the fact that the historic ranches produce 20% of the milk for the bay area and 20% of the oysters, alas no more).

Issue agricultural lease/permits with 20 year terms to existing ranch families to continue beef and dairy operations as this is the Park's "natural heritage".

Manage Tule elk for effective separation from the ranches, as the ranches have protected and thrive on their management of the pastoral zones since the 1860s.

Stewardship does begin with people!

Connie Morse Inverness

#625

Name: McAvoy, Daniel

Correspondence: More access is required for the growing mountain bike demographic. The mountain bike community is very active in trail maintenance and could be a good resource for NPS.

#626

Name: Koval, Janet

Correspondence: I'm writing to discourage the Park Service from allowing mountain bikes on trails in the Pt Reyes National Seashore that have been traditionally reserved for hikers and equestrians. The bike lobby/lawyers continue/s their attempt to rewrite the intent of the Wilderness Act through lobbying and litigation. Many equestrians in the United States have lost their access to wilderness areas because of mountain bike encroachment on public lands and wilderness.

What typically happens when mountain bikes are allowed on single track trails and a conflict arises between bikes and horses, is- -the horses are no longer allowed on the trails- -even when cyclists are the ones not observing trail etiquette that give horses the right of way. I've experienced this several times when a cyclist rushes up behind a horse and rider, the horse spooks, and conflict between both trail users ensues. Ultimately it ends up that the horses are deemed too dangerous to be on the trails.

Many trails at Pt. Reyes are damp and slippery certain times of the year due to fog and coastal rains. Allowing bikes on these trails would create erosion and ruts in the trails to an extent it would make them unusable. And, of course, horses would be blamed for the erosion and prohibited from use of the trails. The scenario plays out over and over and equestrians end up losing access to National Park trails, National Forest Service trails, State Parks, etc.

Mountain bikers have plenty of public land access, yet they act like spoiled children always whining for more. They should not be allowed to continually encroach on public and wilderness lands. Leave the Pt Reyes National Seashore a pristine area so hikers and equestrians can enjoy the peace and quiet of the place.

#627

Name: Popplewell, Brian

Correspondence: I support these bicycling projects, as advocated for by the Marin County Bicycle Coalition:

A new trail between Devil's Gulch and Platform Bridge through the Cheda, McIsaac, and Zanardi Ranches.

A plan to connect the Cross Marin Trail into Point Reyes.

Adoption of social trails off Bolinas Ridge for better connectivity and a single-track trail experience.

Extend the Olema Valley Trail to Bolinas on the east side of Highway 1.

Close gaps for bikes through ranch lands in the park, including closing the Estero Trail loop, connecting Sir Francis Drake Blvd. with Pierce Point Road, and connecting Marshall Beach to Pierce Point Road,

A more bike-friendly permit application process for road and mountain bike events in the park, including along Bolinas Ridge and out to the lighthouse.

Bike access to all ranch roads in the pastoral zone that are already open to pedestrians.

-Brian Popplewell

#628

Name: N/A, N/A

Correspondence: I hear that the mountain bikers are mounting a campaign to gain access to the trails at Pt. Reyes National Seashore, one of my favorite horse camping places. As an equestrian and hiker, I value the wilderness and natural quiet trails. It is important that the visitor experience be maintained for the majority (hikers and equestrians). Constantly looking over your shoulder for speeding bikes is not a good experience. Horses naturally spook when something unknown speeds towards them, which puts riders at risk of injury/death. The bikers already have 75% - that is enough. Please preserve this popular and well-used area for us to enjoy safely. Thank you.

#629

Name: Muhanoff, Diana

Correspondence: NPS, I am in favor of eliminating ranching and dairying in our national park in favor of additional opportunities for the enjoyment of the public. Overgrazing has destroyed unique California plants and native habitats. A healthy ecosystem is worth protecting. Best regards, Mrs. A. Muhanoff

#630

Name: N/A, N/A

Correspondence: This plan will greatly improve access and safety for everyone (pedestrians, cyclists and motorists). Im always surprised at how awkward and restricted bike access is in California. Suburban Atlanta has better bike access.

#631

Name: N/A, N/A

Correspondence: Greetings:

My husband & I are long time visitors to Point Reyes National Seashore, even with some 30 years of living on the Peninsula. Now we live in Sebastopol, almost 20 years. We basically hike there every other week, so we know the park well, especially some of the trails. Years ago, we also spent some time camping there also.

I'm listing my comments in paragraph form:

Climate Change: It is truly happening, and the NPS should do all it can to prepare for it, despite what our President says.

Elk Versus Domestic Animals: Tomales Point is a wonderful place to see a slice of the Elk's home. I would like to see it expanded & know the controversy with the cows. I have no problem with Ranches who practice good environmental practices, e.g. keeping their animals out of wetland habitats, moving animals to prevent over grazing, etc. Initially, these grasslands were home to many grazers. Without domestic grazers, fire danger would increase.

Feral Deer: Years ago when we first started coming to Pt Reyes NS, we found the other 2 species of feral deer all over...they could not be avoided. I know that culling had to be involved (thank you for that, as some were against killing anything). We have not seen a feral deer in many years. Keep up the good work.

The commitment of the NPS I think is to protect the land & the wildlife, as well as to offer the citizens a wonderful outdoor experience. It has always been a clean park, & in all the years, we've only seen one dog which was obviously not a service animal.

The Visitor's Center is extremely well run & I can't say enough good things about the people who work there. Good job, especially considering I'm sure there is never enough staff to get everything done, including the people who work on the trails.

Non-native Plants: We have reported & even cut & removed the flowering stalks of Jujuba Grass (name?). Removal of non-natives are very important here...don't become a Bodega Bay!!!! I believe the Beach Grass along Limatour Beach is not native & is from England, but would probably never be removed. The Ice Plant should be replaced with other CA coastal natives. Also, years ago I reported Vinca Major (?) along a portion of the Estero Trail. This should be removed.

Pt. Reyes Association: As long time members we have seen the communication to the public become better & better. Probably not connected with the NPS, it is a valuable service...I've taken several classes & we both helped with some restoration when we first moved here.

We care very, very much for this park, as well as all the others in the NPS. They are all especially needed at this time.

Sincerely...a park lover. Thank you making the time to read this.

#632

Name: N/A, Shannon

Correspondence: Hi,

I strongly support the following improvements to be made so it can be shared with peddle bicycles (non electric), hikers, and equestrians:

A new trail between Devil's Gulch and Platform Bridge through the Cheda, McIsaac, and Zanardi Ranches.

A plan to connect the Cross Marin Trail into Point Reyes.

Adoption of social trails off Bolinas Ridge for better connectivity and a single-track trail experience.

Extend the Olema Valley Trail to Bolinas on the east side of Highway 1.

Close gaps for peddle bikes through ranch lands in the park, including closing the Estero Trail loop, connecting Sir Francis Drake Blvd. with Pierce Point Road, and connecting Marshall Beach to Pierce Point Road,

A more peddle bike-friendly permit application process for road and mountain bike events in the park, including along Bolinas Ridge and out to the lighthouse.

Peddle bike access to all ranch roads in the pastoral zone that are already open to pedestrians.

Mountain and road bicyclists have been known to financially and physically support trail building within and outside our local communities. We can learn from other communities in regards to embracing coexistence of native inhabitants, peddle (non motor/non electric) bicyclists, hikers, and equestrians. Thank you for your consideration. :)

#633

Name: Rosen, Seth

Correspondence: This comment is submitted November 27, 2018 by Seth Rosen. I am a member of the Point Reyes National Seashore Association (PRNSA) Program and Trails Trust Committee and Board of Directors; however, this comment is being submitted by me as an individual and is not intended to represent the views of PRNSA.

The scoping and implementation of the Environmental Impact Statement (EIS) undertaken as part of the General Management Plan (GMP) Amendment for the Point Reyes National Seashore (PORE) presents a unique opportunity to create a visionary "master trail plan" for the development of a long-term, "inspirational" coordinated trail system within the planning area and PORE, linking the extensive southern trails with the currently isolated stretches of trails in the northern section of the planning area. Such a "master trail plan" will enhance connectivity which will improve visitor experiences in the planning area.

The National Park Service (NPS) GMP Amendment EIS scoping materials state that "The NPS would strive to improve hiking, biking, and equestrian access to the planning area." I am in strong support of this effort and this comment advocates that the scope of the EIS fully embrace and account for the creation of a master trail plan for PORE connecting the north and south sections. It is critical that the NPS embrace now a long-term visionary approach to trail planning as part of the GMP Amendment because all of the critical points of trail connectivity fall within the planning area.

Importantly, a visionary, inspirational trail plan developed as part of the GMP Amendment EIS process does not necessarily need to be implemented in the short-term (3-5 years), yet it enables the creation of an inspiring vision for a long-term network of a unified, well-considered trail network that would allow various organizations (hiker,

biker, equestrian, native Americans, birding, camping, etc.) to rally around and provide volunteer funds and labor to implement such a vision. As noted by the NPS, it also allows collaboration "with ranchers and other partners to interpret the story of ranching in the park."

Today, PORE's trail creation and maintenance within the planning area (and more generally, throughout the Park) is marked by being chronically underfunded. There is no indication that this will improve in the foreseeable future. This chronic under-funding creates a strong reluctance on the part of NPS and PORE to create new trails because this would only add to the underfunded trail maintenance burden and expense. This also has required PORE to rely heavily on volunteers (individuals and organizations) to maintain existing trails and this too has been a struggle for the NPS.

This comment advocates for the creation of a 'master trail plan' as part of the EIS scope as more specifically described below. A plan can then allow for opportunistic implementation over the longer term (5-50 years) as needed resources become available. A plan does NOT necessitate immediate additional trails nor funds for their creation or maintenance and the under-funding of trail maintenance should not be a reason to avoid creating an inspirational trail vision at PORE for the future.

1. Through the GMP Amendment process, the Park should establish an "inspirational" trail plan to guide the planning and creation of enhanced trail connections. Similar efforts throughout the United States National Park system have shown how "inspirational" trails drive enhanced access, awareness, use, and importantly donations (in terms of both money and time). There are many examples (e.g., the Pacific Crest Trail, The John Muir Trail, the Long Trail, the Appalachian Trail, and many others as this approach is being used more and more due to its success). In each case, non-profit, citizen-led volunteer organizations focused on volunteerism for assisting the NPS with trail and interpretive site maintenance and funding have arisen and flourished, driving greater public awareness of the natural, historic and cultural points of interest.

1.1. More specifically, the Park should establish an "inspirational" vision for the PORE trail system that connects the northern section and southern sections of PORE to create a unified, long-distance trail system. I emphasize that creating a "vision" does not mean creating the trail themselves today. But with a vision, the public will rally around its creation and implementation over the next 5 - 50 years as PORE matures. Such an "inspirational" trail could have an inspiring name unique to PORE such as, as just one example, the Pacific Plate Trail (or "the PPT") and could have its terminal points at Tomales Point and Palomarin Trailheads.

1.2. A north/south trail could be envisioned either as a single trail or, preferably, as a "loop" with a "low road" and a "high road" both of which primarily rely on existing trails inside and outside the planning area and - within the planning area - could use existing ranching roads and/or "social trails" (where appropriate) in the short term and be replaced with more well-considered trails in the longer-term.

1.2.1. The "low road" would link the southern trail systems via the Estero Trail, with the northern section of the Park. Specifically, the "low road" could provide better public access to:

1.2.1.1. the historic Life Boat Station cemetery (with new interpretive sites that could highlight the role of immigrants generally, or Scandinavian immigrants specifically, as well as public service and personal sacrifice of first responders); and

1.2.1.2. Abbot's Lagoon using existing ranch roads on G Ranch that are not currently designated as trails);

1.2.1.3. The historic KPH Maritime Radio Receiving Station.

1.2.2. The "high road" could link the southern trail systems via the Inverness Ridge Trail, with the northern section of the Park, all of which fall within the planning area. The "high road" would aim to follow the Point Reyes Peninsula ridge line (as feasible) north, using L Ranch road (not currently designated as a public trail) towards the

Tomales Point Trail, and provide enhanced access to Tomales Bay State Park as well as the spur trails to Marshall Beach, Laird's Landing and other sites on the eastern side of the planning area.

1.2.3. The "low road" and "high road" could also be connected by use of the historic (now defunct and overgrown) ranch road which connected Vision Road on the Inverness Ridge with Home Ranch. The historic Randall Ranch had a ranch road connecting Vision Road to the Randall Ranch homestead (the foundation ruins and some farming equipment which still remain) and continuing down to Home Ranch. The road grading is intact and it could be converted to a foot trail with relatively small investment.

1.3. A master trail map could create a vision for planning for both the short-term and longer-term at the same time.

1.3.1. The short-term plan would optimize for near-term public access and enjoyment. The short term plan would follow the NPS practice of making use of existing ranching roads and facilities to enable more immediate public enjoyment at a minimum of time and effort.

1.3.2. The longer-term plan would optimize for quality and sustainability which will (1) reduce long-term trail maintenance efforts and costs; (2) improve visitor access and experiences in the planning area; (3) improve the visitor's experience learning about point of cultural, historic and natural interest within the planning area; and (4) increase volunteerism (and hence engagement) in accessing, funding and maintaining the trails.

1.3.2.1. The past practice within PORE of heavy reliance on pre-existing ranching and fire roads for the creation of today's trail system created enhanced visitor access to the Park in the short-term, but created a higher than needed maintenance burden because prior studies have shown that maintaining the dirt roads is far more expensive than maintaining footpaths and smaller (non-road) multi-use trails (see e.g., Trail Inventory and Condition Assessment with Recommendations, Point Reyes National Seashore and the North District of Golden Gate National Recreation Area, National Park Service, November 2003).

1.3.2.2. A longer-term plan for replacing existing 'dirt roads used as trails' for a new trail serving a comparable purpose but whose actual route would be set in the interests of recreational, historical and/or cultural points of interest (not merely the interests of re-using a pre-existing farm road as a quick and easy access enhancement strategy); or re-routing of one or more existing trails to account for changed conditions (e.g., connecting the Estero trail to the former site of the oyster company) to enhance visitor enjoyment, lower overall environmental impact and reduce medium and longer-term costs for road maintenance (since trails are less expensive to maintain than dirt roads);

1.4. The creation of an 'inspirational' trail map is not intended to be inconsistent with any of the proposed alternatives. This trail vision would work equally well with the status quo ranching and dairy operations, as well as if the GMP Amendment process would reduce or eliminate ranching activities.

2. The NPS writes that "The planning area is generally open to public access, including grazing areas in applicable alternatives, but additional route designation and promotion would help visitors better enjoy and experience the area."

2.1. While public access to grazing areas within PORE is legally permissible, in practice THE PUBLIC DOES NOT GENERALLY KNOW THIS because there is effectively no public notice that the general public can walk freely in grazing areas (so long as they do not encroach on housing or active ranching operations). In fact, the presence of extensive fencing provides a clear and opposite message: 'do not enter!' No reasonable member of the public would believe that a fence meant "come in!" unless there was clear and adequate notice stating this.

2.2. The NPS has not posted signs on the fencing notifying the public that these fences (as opposed to most other fences throughout the United States) are different and are intended only to keep the cattle in, but not to keep the public out. Yet the ranchers too would have valid concerns about unstructured public access through grazing

areas without any route designation. The absence of notices and route designations could create more problems than it solves.

2.3. Ensuring that clear route designations and public information envisioned as part of the EIS scoping process would enable enhanced public access, enhanced public safety, reduced disruption of ranching operations, and an opportunity to educate an urban population of "local" food production and the life of beef and dairy ranchers who provide the milk, butter, cheese, and meat upon which so many in the San Francisco Bay Area rely.

3. The scope of the EIS undertaken as part of the GMP Amendment process should also view enhanced trail access as an opportunity to highlight the historical and cultural significance of points of interest in the Park. The scope of the planning process should mesh new trail access or designation and interpretive sites that highlight:

3.1. working ranches where urban visitors see dairy and beef ranching operations and make the connection to "local" food production specifically and their food sources more generally;

3.2. trail segments designed to reach sites showing how the Coastal Miwok re-shaped the land;

3.3. historic site of the town of Point Reyes (on today's F Ranch) with interpretive sites showing the connection between ranching, dairy produce and meat commerce with San Francisco via shipping at Schooner Bay and access to the old piers at Schooner Landing; (F Ranch is a disturbed site due to historic uses and so should be considered as a prime location for development);

3.4. Historic KPH Maritime Radio Receiving Station with its Art Deco-designed facility and interpretive sites explaining the importance of the receiving station history.

3.5. the Estero Trail alongside Home Bay and on Home Ranch lands, interpreting the cultural history of indigenous people, the history of the Shafter Home Ranch (once "possibly the largest butter dairy in the world"), rum-running at this site during Prohibition, followed by Japanese-style pea and artichoke farming until the internment of Japanese farmers during WWII and the restriction of German farmers to the eastern side of Route 1 during the same time period.

3.6. Educational opportunities for archeological excavations of Schooner Bay historic docks, enabling cooperation between the University of California archeology and other graduate field programs and/or local colleges and, possibly high schools. This could also, potentially, be undertaken as part of existing Park programs (Science at the Seashore, etc.) but this is not required.

For the avoidance of doubt, this comment is not intended to express any view or preference on the alternatives being considered under the GMP Amendment planning process.

Thank you for your consideration of these comments.

#634

Name: N/A, N/A

Correspondence: I am writing you at this time to respectfully ask you to support improving access off road for cyclists in Point Reyes National Seashore. I am requesting that you support implementing the following measures: A Platform Bridge through the Cheda, McIsaac, and Zanardi Ranches.

A plan to connect the Cross Marin Trail into Point Reyes.

Adoption of social trails off Bolinas Ridge for better connectivity and a single-track trail experience.

Extend the Olema Valley Trail to Bolinas on the east side of Highway 1.

Close gaps for bikes through ranch lands in the park, including closing the Estero Trail loop, connecting Sir Francis Drake Blvd. with Pierce Point Road, and connecting Marshall Beach to Pierce Point Road,

A more bike-friendly permit application process for road and mountain bike events in the park, including along Bolinas Ridge and out to the lighthouse.

Bike access to all ranch roads in the pastoral zone that are already open to pedestrians.

#635

Name: Logwood, Kari

Correspondence: Please allow more bicycle access to the trails in Marin. I'm an avid hiker along with being a cyclist who loves to explore the beauty of California. I have a bikepacking trip to Pt Reyes planned for early February, staying at the Wildcat CG. I would love to do more of this but can only if the trails are accessible by bike. Thank you.

#636

Name: Potter, Randall

Correspondence: Please Open more trails in the point Reyes area to bicycles.

#637

Name: Gillespie, JoAnn

Correspondence: Hello,

Please make sure single track trails with blind corners are not open to bicycles as they travel too fast to safely avoid pedestrians and equestrians. I also suggest implementing a bell policy. If all bikes have a bell on the handle bar that jingles as they ride pedestrians and equestrians can hear them approaching. Many times the bike riders have ear bud headphones in and you are unable to communicate with them. If we can hear them coming before we can see them then we can get ready for their approach. I would also like to see educational signage explaining that pedestrians and equestrians have the right of way, and that horse will want to pass on the up hill side as not to be run off trails down a ravine or cliff. I strongly urge that these signs go beyond the universal upside down triangle sign that is confusing to some as it shows the equestrian on the bottom trying to communicate that it would have to right away first to pedestrians and bikes. I think education, supervision, and a mounted patrol to enforce the rules is required to bring all the users on the trail to a deep understanding of trail safety educate. As an avid skier I am a strong believer that bikes should have some bike only trails that they can go fast on just like at a ski resort you would have different levels of difficulty trails and the users would need to know they have the skills and safety training to execute those trails. If you do not give them an outlet to go fast they are going to do it where ever they want including blind corner single track trails. I hope my opinion has helped you in your planning process.

#638

Name: Harris, Roger

Correspondence: Dear NPS:

I am a Marin County resident, a professional wildlife biologist, and a longtime visitor to the Point Reyes National Seashore.

I would like to urge the NPS to support the option to phase out dairy ranching in the park while allowing some beef ranching to continue. The Park Service should not to remove or kill any elk.

In terms of scoping, I am interested in knowing what are the impacts of ranching and dairy on the natural environment. I am particularly interested in knowing about erosion, water pollution, and the composition of native plants.

Sincerely, Roger D. Harris Certified Wildlife Biologist

#639

Name: N/A, N/A

Correspondence: Is there a process for flexibility among the users permitted by the LMUs? Variance? Conditioned use Permit?

#640

Name: Jelliffe, Norene

Correspondence: Dear Superintendent Muldoon,

Thank you for soliciting commentary on your Point Reyes General Management Plan Amendment Environmental Impact Statement. I am encouraged that environmental impact studies will be part of each of the six options being considered.

Both the Tule Elk and Ranching in this area are important. There are socio economic benefits derived from both. The Elk are a draw to the area for their esthetic, natural beauty and for tourism and local hikers alike, thus supporting local businesses. The ranches provide for and support many local businesses in and around West Marin, plus provide an attraction to locals and those outside these areas as well.

For the ranchers, stipulation of the length of their leases seems paramount to their functioning. If they aren't sure whether the lease will extend to all of 20 years, rather be unspecified from 1 to 20 years, that would make it difficult for them to plan maintenance, purchase needed equipment, etc. This is left vague in the language of "up to 20-year permits." In Congressman Huffman's bill HR 6687, is contained a commitment to long term lease support, a very important aspect.

I hope for a reasonable solution / compromise that will include both concerns.

Sincerely yours, Norene Jelliffe

#641

Name: Murphy, Joanna

Correspondence: I think it is imperative to keep Pt Reyes the way it is- -enjoyed by hikers and equestrians. Bikes add an element of speed and danger. There have been many horrible, serious accidents amongst equestrians and bikes in Marin County and the danger cannot be denied. Pt Reyes has many blind curves and long downhill stretches that together make a setup for some terrible accidents, such as the Stewart Trail, with it's steady, steep grade and twisty nature. This is a foreseeable recipe for trouble. Bear Valley Trail is already closed to horses on the weekends due to heavy traffic. This would force bikes and horses into the same few compressed days on trails that, again, have long steady declines and blind turns.

Pt Reyes is a jewel in the national park system. Please keep it the magical, wonderful and peaceful place that it has been for so long.

#642

Name: Smith, Steven

Correspondence: Hi, Point Reyes is one of the greatest places to ride that I know of. Stewart Horse Camp in particular. There are plenty of other places for mountain bikers to ride. My mule is scared when a biker comes down the trail with their music going with their ear buds. The biker is not aware of their environment. No to mountain bikers in Point Reyes.

#643

Name: Evans, Bronwyn

Correspondence: Hello, I am writing to express my concern regarding the expansion of bicycle access at Pt Reyes. As an avid hiker who enjoys the park at least weekly I have many a story pertaining to cyclists who seem to disregard the walking public's safety. Rude and dangerous is how I have experienced many a cyclist. I have enjoyed mountain bike riding in the past myself, so came to my first experiences with some understanding - which was quickly eroded by poor cyclist behavior. Cyclists already have free access to the Marin Watershed where I no longer choose to hike for fear of being run down. Single track trails in particular are not favorable for bike vs hiker/horse encounters. Please do not increase cyclist access in Pt. Reyes. Thank You, Bronwyn Evans

#644

Name: Taggart, Grant

Correspondence: This is a call to action. Follow the link, write in support of bicycle trail projects in Pt. Reyes. I did. My text:

I support these bicycling projects, as advocated for by the Marin County Bicycle Coalition:

A new trail between Devil's Gulch and Platform Bridge through the Cheda, McIsaac, and Zanardi Ranches.

A plan to connect the Cross Marin Trail into Point Reyes.

Adoption of social trails off Bolinas Ridge for better connectivity and a single-track trail experience.

Extend the Olema Valley Trail to Bolinas on the east side of Highway 1.

Close gaps for bikes through ranch lands in the park, including closing the Estero Trail loop, connecting Sir Francis Drake Blvd. with Pierce Point Road, and connecting Marshall Beach to Pierce Point Road,

A more bike-friendly permit application process for road and mountain bike events in the park, including along Bolinas Ridge and out to the lighthouse.

Bike access to all ranch roads in the pastoral zone that are already open to pedestrian

Grant

#645

Name: Moulton, Lynda

Correspondence: I love riding at Pt Reyes and only camp at the Stewart's Horse Camp. I try to go once or twice a year and stay 3-7 days! I would be so sad if it closed. There is always people there camping. You have to go early to get a spot!! I love staying during the week also.

#646

Name: N/A, Teresa

Correspondence: I am an avid user of the Pt Reyes National Seashore for over 35 years. I have ridden my horses and hiked this magical, quiet, serene wilderness area to get away from the city life. Allowing bicycle access to trails and ranch roads could be dangerous for the environment and/or others who already use the area.

Within the last decade I have experienced more and more bicycles illegally accessing the trails making it dangerous for hikers & equestrians. Please consider keeping this area wild, quiet, and serene for hikers & equestrians. This area is one of the few places that horses can still access and ride safely.

I am aware that bicycles already have major access to most of the parks and roads within Marin County..

#647

Name: Hackbarth, Randy

Correspondence: Sir, As a Hiker/ Equestrian I like having non-multi use trails to walk/ ride on for safety reasons and for the pleasurable experience of slow pace in watching the wild animals and observing the different flora, communing with nature at its best. I enjoy bringing youth walking or riding teaching the experience of Leave No Trace as we navigate through the public lands and parks thereby protecting lands for future generations.

I believe all users deserve the right of the appropriate experience in our parks and public lands. I feel Multi-use has turned into a antique trail application. Due to the speed that mode-o-cross mountain biking has turned into. Mountain biking deserves a trail system also but not with the slower pace users (hiking/equestrian). Thank you,

#648

Name: Serra, Dawn

Correspondence: I support Alternative F - No Ranching in Pt. Reyes National Seashore. This public land belongs to all Americans and it's time to return it to the wildlife that desperately need it to survive.

#649

Name: Heiken, Doug

Correspondence: FROM: Doug Heiken, Oregon Wild

TO: National Park Service, VIA: <https://parkplanning.nps.gov/commentForm.cfm?documentID=91640> DATE: 27 Nov 2018 RE: Pt Reyes National Seashore Tule Elk General Management Plan Amendment

Please accept the following scoping comments from Oregon Wild regarding the proposed Pt Reyes National Seashore Tule Elk General Management Plan Amendment EIS, <https://parkplanning.nps.gov/document.cfm?documentID=91640>. Oregon Wild represents 20,000 members and supporters who share our mission to protect and restore wildlands, wildlife and waters as an enduring legacy. Many Oregon Wild members visit natural areas in California, including Point Reyes National Seashore.

We urge the NPS to prepare an EIS with a range of alternatives that emphasize ecological restoration and low impact recreation as required by the legislation creating the national seashore.

It's time to livestock grazing to be phased out and for Tule elk to flourish.

Please carefully consider the following issues in the EIS:

- The elk cannot thrive on the narrow strip of land at Tomales Point. They should be allowed to move freely throughout the National Seashore and compatible adjacent lands.

- Cattle grazing has a wide range of adverse impacts on the environment and recreation, including soil erosion, water pollution (both sediment and fecal coliform), degrading native plant communities, spreading weeds, reduced landscape carbon storage, spreading diseases, fences that can harm or kill wildlife and impede recreation uses, loss of habitat, wildlife mortality from various ranching practices, etc.

- The livestock operations were bought out decades ago. They are only allowed to continue if they do not impair the natural resources and wildlife. The National Seashores legal charge to provide "public benefit, recreation and inspiration." Livestock grazing is incompatible with these mandatory requirements, especially in areas where crops are grown to feed livestock and areas where cattle concentrate for feeding, and where impacts like those described above occur.

Each substantive issue discussed in these comments should be (i) incorporated into the purpose and need for the project, (ii) incorporated into a NEPA alternative, (iii) carefully analyzed as part of the effects analysis, and (iv) considered for mitigation.

#650

Name: Szilagyi, Shari

Correspondence: Yes please. Much needed trail system

#651

Name: Steinfels, Horst

Correspondence: Obviously, opening up Point Reyes NP to mountain bikers is an extremely bad idea.

I am against it.

#652

Name: Forscher, Teddy

Correspondence: Marin has long been one of the Bay Area's best destinations for biking, on all road surfaces (gravel, road, mountain, multi-use path, etc.), but connections to and through Pt. Reyes have always been lacking, causing unsafe connections for bicyclists to the National Seashore.

As NPS reviews its land management practices, I would urge you all to consider making the area more accessible for bicyclists, by road, and by trail. There would be no added congestion and a tremendous amount of added benefit.

#653

Name: N/A, N/A

Correspondence: The interests of more than 300 million Americans, and 7 million Bay Area residents, should take precedence over the interests of 13 ranching families who have over stayed their lease terms.

#654

Name: kowaleski, steve

Correspondence: I would like to see more Mountain Biking access in Point Reyes. These would be good options:

A new trail between Devil's Gulch and Platform Bridge through Cheda, McIsaac and Zanardi Ranch. A plan to connect the Cross Marin Trail into Point Reyes. Adoption of social trails off Bolinas Ridge for better connectivity and a single-track trail experience. Extend the Olema Valley Trail to Bolinas on the east side of Highway 1. Close gaps for bikes through ranch lands in the park, including closing the Estero Trail loop, connecting Sir Francis

Drake Blvd. with Pierce Point Road and connecting Marshall Beach to Pierce Point Road, A more bike-friendly permit application process for road and mountain bike events in the park, including along Bolinas Ridge and out to the lighthouse. Bike access to all ranch roads in the pastoral zone that are already open to pedestrians. Comments are due by November 30, so don't delay! thanks SteveKowaleski

#655

Name: Dobson, Edward

Correspondence: Thank you for this opportunity to participate. Anyone who cares about Point Reyes does not want mechanical intrusions.

#656

Name: Miller, Clark

Correspondence: Please provide bicycle access through the Golden Gate NRA in the following areas:

A new trail between Devil's Gulch and Platform Bridge through Cheda, McIsaac and Zanardi Ranch.

A plan to connect the Cross Marin Trail into Point Reyes.

Adoption of social trails off Bolinas Ridge for better connectivity and a single-track trail experience.

Extend the Olema Valley Trail to Bolinas on the east side of Highway 1.

Close gaps for bikes through ranch lands in the park, including closing the Estero Trail loop, connecting Sir Francis Drake Blvd. with Pierce Point Road and connecting Marshall Beach to Pierce Point Road,

A more bike-friendly permit application process for road and mountain bike events in the park, including along Bolinas Ridge and out to the lighthouse.

Bike access to all ranch roads in the pastoral zone that are already open to pedestrians.

Thank you!

#657

Name: Gerlach, Grant

Correspondence: As an avid cyclist and hiker I would like to support the list of access recommendations from the Bicle Trails Council of the Easy Bay A new trail between Devil's Gulch and Platform Bridge through Cheda, McIsaac and Zanardi Ranch. A plan to connect the Cross Marin Trail into Point Reyes. Adoption of social trails off Bolinas Ridge for better connectivity and a single-track trail experience. Extend the Olema Valley Trail to Bolinas on the east side of Highway 1. Close gaps for bikes through ranch lands in the park, including closing the Estero Trail loop, connecting Sir Francis Drake Blvd. with Pierce Point Road and connecting Marshall Beach to Pierce Point Road, A more bike-friendly permit application process for road and mountain bike events in the park, including along Bolinas Ridge and out to the lighthouse. Bike access to all ranch roads in the pastoral zone that are already open to pedestrians

#658

Name: ives, susan

Correspondence: Dear Superintendent Muldoon,

Thank you for the opportunity to provide input into the alternatives for the Point Reyes Seashore GMP Update. My comments apply to the proposed alternatives, and I also submit an additional alternative that I believe needs to be analyzed in this planning process.

I have lived in Marin County for more than 40 years and have both worked and volunteered for the National Park Service. As a birder, photographer, hiker, and kayaker, I visit Point Reyes often. The park is less than an hour's drive from where I live.

National parks are among the few remaining havens for wildlife, and I, like millions of park visitors, go to the Seashore hoping to see wild animals on their own terms, in a place that, by law, is dedicated to their preservation and well-being.

While I understand that ranching historically has played a role at Point Reyes, ranching as it currently exists in the national park is inimical to the mission of the park service and the purposes for which the Point Reyes National Seashore was established nearly 60 years ago.

It's painful to see our national seashore—a remnant of a once-vast coastal prairie—trampled and overgrazed by domestic cattle; junked cars and debris at residences seen along park roads; dairy cows standing in feedlots of mud and manure; ranch workers living in substandard housing, industrial-sized buildings erected in the name of "historic" ranching. I have visited national parks throughout the country and have never seen a national park landscape so drastically altered in the name of historic preservation.

That Seashore ranches have lately been listed on the Register of Historic Places does not commit the park service to leasing Point Reyes Seashore to commercial cattle operations. Other national parks interpret their historic resources without having to re-enact them. For example, at Natchez Historic National Park, slaves tending tobacco and cotton on plantations were historical agricultural practices, even though NPS has chosen not to perpetuate them. Similarly, at Lowell National Historic Park, young girls no longer are put to work in historic textile mills, and the park service manages to vividly interpret that important history without them.

That five of the six alternatives proposed in the NPS scoping document include ranching reflects a persistent bias on the part of the park service. Ranching, as practiced at Point Reyes Seashore is not historic, is increasingly detrimental to the natural resources, is a contributing factor to climate change, and is "viable" only because of direct and indirect subsidies paid for by the public.

Planning decisions for perpetuating "historic" ranching at Point Reyes Seashore should be based on science and economics, not nostalgia.

Comments to the proposed alternatives:

1. Restoring the historic landscape of Point Reyes Seashore should be a central goal of the management plan, and should be part of the NPS analysis.

Current alternatives make no mention of the Point Reyes landscape that existed prior to the land's conversion to private agriculture in the mid-1800s. What was the natural and cultural history at Point Reyes before ranching?

Restoration and interpretation of the native coastal prairie ecosystem should be a management goal. This is significantly more than what the scoping document refers to as working with ranchers "to manage non-native vegetation."

Currently, the goal is simply to keep ranching. The question is how could ranching contribute to the well being of the park, its wildlife, and visitors' experience? Organizations, including The Nature Conservancy, have done extensive work in the field of restorative ranching: rotational grazing, cultivating native plants, friendly fencing; restoring creeks.

2. In what ways does NPS plan to “monitor” and “work with ranchers,” to effectuate better outcomes for the park and public?

NPS's proposed alternatives detail options for the “management” of native Tule elk, but there is no mention of management or oversight of the ranches, particularly those that fall short of complying with the terms of their leases. Given that existing lease agreements already require protecting sensitive resources, what will the NPS do that it has not done to this point to address the impacts of cattle operations to the land, water, wildlife, endangered species, and public access? See #1 above.

3. The costs to taxpayers to maintain these private ranching operations and public land need to be included in the NPS analysis of the alternatives that allow for continued ranching,

NPS management of Seashore ranches places many demands on limited park personnel and budgets. None of the current alternatives disclose the costs of sustaining the private ranches and the park infrastructure that supports them. , The funding dedicated to managing and subsidizing ranching operations could be reallocated to ecological restoration, with ranchers taking part.

4. Costs and benefits to the public should be explicitly described in all of the alternatives proposed for the Seashore.

Public benefits are not currently discussed in any of the continued ranching alternatives. Unlike ranchers outside the national park, Seashore ranchers pay no property taxes. What are the impacts on subsidized ranching on ranching outside the park that is not subsidized?

5. What are the costs and benefits to the public “diversification and operational flexibility” of ranching operations?”

As described in the scoping materials, the benefits of “diversification” (crop farming and the addition of livestock heretofore not permitted in the park) accrue entirely to private ranchers, but there is no analysis of the costs and who bears them. Is it the NPS's role to keep ranchers in business? What are the costs and benefits to the park and public of doing so? Such an analysis is required.

To assist the public in making informed comments to the forthcoming draft GMPA and EIS, please provide this supporting information and analysis:

- Definition of terms “diversification and operational flexibility” in layperson's terms.
- Analysis of the economic implications, costs and benefits to the public of each of the proposed alternatives.
- Maps and species inventories that explicate the impacts of each alternative.
- History of violations of lease agreements.
- Studies, reports, and data documenting the trends and conditions of natural resources (land, water, wildlife, climate) at the Seashore.
- Operating budgets from the past 10 years that show allocations for personnel, infrastructure, and capital costs related to both ranching and visitor services; and income to the Seashore, including grazing fees and rental income to the park service.

An additional alternative for inclusion in the GMPA analysis:

Phase out ranching and engage the ranchers, public and strategic partners in activities the support the recovery and restoration of the Seashore's natural resources, including grasslands, wildlife, waters, and climate. These activities include:

- Maximum protection for native wildlife throughout the National Seashore.
- Reallocation of NPS resources from ranching to active restorative management.
- Removal of non-historic ranch infrastructure.
- Safe passage for wildlife, removal and, where necessary, replacement of fences.
- Full public access to parklands for recreation and education.
- Converting some of the commercial ranches to demonstration areas and testing grounds for restoration.
- The interpretation and publication of research for the public.
- Educating about climate change impacts to the Seashore and how they are being addressed.
- Reallocation of resources from private ranch operations to visitor services, including a visitor center, interpretative displays, trails, campgrounds, bathrooms, restaurants, and lodging. (The Presidio offers a model for repurposing existing assets, such as buildings for public, educational, and nonprofit purposes).
- Conversion park residences to housing and workspace for universities and scientific institutions to study climate change and restoration agriculture. (Stanford's Jasper Ridge Biological Reserve, Scripps Research Institute, Woods Hole Research Center, and Rocky Mountain Biological Laboratory offer models).
- A robust volunteer program and collaboration with public and private partners in restoration projects. (GGNRA offers a model).

This planning process, at this time, is more than an opportunity to rationalize continuation of obsolete agricultural practices and attitudes. Make Point Reyes National Seashore a national model for national parks for the future: discovering and applying best practices to restore our natural heritage, and meeting the global challenge of climate change.

Thank you for your efforts.

Sincerely,

Susan Ives

#659

Name: Pandapas, Laura

Correspondence: I am writing to express my support for a full environmental impact review of the activity of ranching in Point Reyes National Seashore, along with the consideration of other alternatives for our parkland that don't involve commercial ranching operations. I oppose the overgrazing that has occurred, and the locked gates and the fences that kill wildlife. I want public access to our public lands. I oppose the killing of elk as a management tool. I oppose the fencing off of grazing lands for the tule elk.

Climate change will demand that we shift AWAY from confined animal agriculture. But I digress.....

The ranchers were PAID fair market value for their properties decades ago, with no expressed intent whatsoever that the ranching would continue- -much less expand- - in perpetuity. Whatever the outcome, the ranching MUST adapt to fit in to the unique setting and limitations of the fragile and beautiful Point Reyes National Seashore, and not the other way around. What I don't want is to see is the land degraded further, for the benefit of a few, already-compensated ranching families. These lands belong to all americans, and it's in the interest of all americans now and in the future that the NPS has an obligation under the Organic Act to protect. Never mind Jared Huffman and Rob Bishop attempting to rewrite history and the enabling legislation on behalf of an industrial interest. Protect the spectacular natural beauty of the Point Reyes National Seashore.

#660

Name: Rossi, Matthew

Correspondence: Expanding biking trails is always a great idea. It would also be good to promote land stewardship in conjunction with the expansion of such bike trails. Maybe some of the landowners would be open for volunteer trail days and or restoration projects on their land. Cyclists and ranchers/land owners often don't get along for a number of reasons. It would be amazing to see the two groups come together for the greater good of the land and local habitat.

#661

Name: Vasiliev, Nina

Correspondence: I am in favor of keeping the Bike access to Pt Reyes as it currently is. The wilderness should be open to the public. But keeping some trails closed to the speeding of bikes will keep the wilderness safer for others. For those who are on foot and those on horse back having a few trails which would avoid the possibility of a surprise encounter with speeding bikes would be appreciated.

Most of the cyclers I have encountered on trails are quite lovely. But the possibility of having a few trails to take inexperienced hikers or equestrians would be so appreciated. Being on trails without silent surprises, during their first few encounters may help our newbies value the wilderness more.

Thank you for your work.

Nina Vasiliev

#662

Name: Reese, B.

Correspondence: To whom it may concern:

As a frequent user of the trails at Pt. Reyes National Seashore, I am writing to urge you to keep wilderness off-road trails to equestrian and hiker use only. I have hiked frequently into Wildcat Campground over the years, horse camped at Stewarts Horse Camp and have also ridden my bicycle up over Stewart's Road and along Bear Valley Rd. I have been visiting and recreating on the trails at Pt. Reyes for over 28 years.

I believe that adding fast mountain bike users to the singletrack trails at Pt. Reyes will create a very dangerous situation for equestrians and hikers. I support multi-use trails where possible and have no problems recreating on trails that were designed for multi-use and safe for multi-use (such as Bear Valley Rd.) However, the singletrack trails through the park were not designed for multi-use.

Strava records of illegal mountain bike activity on the Pt. Reyes trails have tracked some users travelling at speeds upwards of 31 mph!! Most foot traffic, even if they are moving at a jog or trot, do not exceed 5-8 mph. Given that trails like Greenpicker, Coast Trail and Glen Trail among others have blind corners, steep drop-offs and narrow sections, this speed differential has the potential to cause accidents and safety issues.

In places such as Annadel and China Camp, mountain bike use has discouraged other users from recreating on weekends due to safety concerns. Personally, we do not use these parks during the weekends and are also careful on the week days.

I believe all users should have access to public trails, but I also don't believe that has to mean equal access on the same trails. Mountain bikers have a plethora of world-class trails in and around Marin County to ride on. Their access to trails keep expanding and there is certainly no shortage of places to ride.

In contrast, hikers and equestrians who wish to avoid the much faster and more extreme mountain bike traffic have a shrinking area to recreate in. The trail system in Pt. Reyes is one of the last places to recreate in the surrounding area for these users. Mountain bikers do not wish to ride with OHV users any more than other users wish to recreate with them. It has everything to do with speed and safety concerns.

Please consider keeping current use restrictions the way it is and maintaining horse and hiker use only on the Pt. Reyes trail system.

Thank you.

#663

Name: Streblow, Doug

Correspondence: I support these bicycling projects, as advocated for by the Marin County Bicycle Coalition: A new trail between Devil's Gulch and Platform Bridge through the Cheda, McIsaac, and Zanardi Ranches. A plan to connect the Cross Marin Trail into Point Reyes. Adoption of social trails off Bolinas Ridge for better connectivity and a single-track trail experience. Extend the Olema Valley Trail to Bolinas on the east side of Highway 1. Close gaps for bikes through ranch lands in the park, including closing the Estero Trail loop, connecting Sir Francis Drake Blvd. with Pierce Point Road, and connecting Marshall Beach to Pierce Point Road, A more bike-friendly permit application process for road and mountain bike events in the park, including along Bolinas Ridge and out to the lighthouse. Bike access to all ranch roads in the pastoral zone that are already open to pedestrians.

Thank you,

Doug Streblow

#664

Name: Moritz, Jake

Correspondence: As a native of San Francisco, Marin and GGNRA land has been where I've gone for adventure and fun for nearly 30 years. As an avid cyclist and high school mountain bike coach, I'd welcome the opportunity to enjoy the land and places I already love, and to bring friends along. Please consider the following issues.

A new trail between Devil's Gulch and Platform Bridge through the Cheda, McIsaac, and Zanardi Ranches.

A plan to connect the Cross Marin Trail into Point Reyes.

Adoption of social trails off Bolinas Ridge for better connectivity and a single-track trail experience.

Extend the Olema Valley Trail to Bolinas on the east side of Highway 1.

Close gaps for bikes through ranch lands in the park, including closing the Estero Trail loop, connecting Sir Francis Drake Blvd. with Pierce Point Road, and connecting Marshall Beach to Pierce Point Road,

A more bike-friendly permit application process for road and mountain bike events in the park, including along Bolinas Ridge and out to the lighthouse.

Bike access to all ranch roads in the pastoral zone that are already open to pedestrians.

#665

Name: Pastorelli, Henry

Correspondence: Thank you for considering improving bicycle access to Point Reyes. It's important we provide low impact recreational opportunities to people, especially near large urban communities. This is one of the things that make the Bay Area a great place to live.

Born and raised in Bay Area,

Henry

#666

Name: pearson, alison

Correspondence: I am writing to express my concern that the park will open up Point Reyes to bicycles and that will turn it into another area that I will not feel safe riding my horse. So many parks in Marin and Sonoma county are now considered by myself and many friends too crowded with speeding and inconsiderate cyclists to be safe for riding horses or walking small dogs on leash. There has been a large influx of people visiting the parks in the last 10 years, which is good, but the cyclists can really make it uncomfortable for the walkers and riders. Annadel is now out of the question, as myself and my riding partner were almost run into by a speeding mountain bike, and she broke her neck as a result of the encounter. Foothills is too full of bikes now, and I have been warned away from many parks in Marin County.

As a result of our fires last fall lots of our parks are still in repair. This puts even more pressure on the places that have open trails. I personally don't think multi-use is appropriate for single track trails in high use areas. Please keep riding as an option in Point Reyes and don't allow bikes on single track trails and roads where they are currently not allowed.

#667

Name: Garvie, Ellen

Correspondence: As an avid hiker/equestrian, I strongly oppose opening anymore trails for cyclists. When hiking in area of MCOSD I have come close to being almost run over by bikers. I have also seen VERY LARGE groups of Summer bike camps of 15 on fire roads etc. This is unacceptable. There are more than enough trails for these bikers, not to mention, they create illegal trails.

#668

Name: Ryan, Elizabeth

Correspondence: Tule elk are a unique subspecies of elk endemic to California. The role of the National Park Service is to preserve unimpaired the natural and cultural resources and values of the National Park System. This mission includes protection of native wildlife within the park system. It does not include killing native wildlife for the purpose of enhancing commercial operations that pre-date the park. The EIS must analyse the impact on NPS mission of killing elk or placing elk in confined spaces, where they may die of thirst, as happened in 2015 under NPS management. The EIS must analyse the priorities of NPS relative to protection of native wildlife for enjoyment of the public, compared to sustaining private ranching operations that only benefit the proprietors.

While the founding of Point Reyes National Seashore explicitly called for maintenance of ranching operations, co-existence with these operations does not require expansion of ranching uses into new livestock species, or into new areas of the park. The EIS must analyse the impact on native wildlife of such expansion, now and in the reasonably foreseeable future, when water may be scarcer.

#669

Name: Miller, Christopher

Correspondence: I believe we need the following in Point Reyes:

A new trail between Devil's Gulch and Platform Bridge through the Cheda, McIsaac, and Zanardi Ranches.

A plan to connect the Cross Marin Trail into Point Reyes.

Adoption of social trails off Bolinas Ridge for better connectivity and a single-track trail experience.

Extend the Olema Valley Trail to Bolinas on the east side of Highway 1.

Close gaps for bikes through ranch lands in the park, including closing the Estero Trail loop, connecting Sir Francis Drake Blvd. with Pierce Point Road, and connecting Marshall Beach to Pierce Point Road,

A more bike-friendly permit application process for road and mountain bike events in the park, including along Bolinas Ridge and out to the lighthouse.

Bike access to all ranch roads in the pastoral zone that are already open to pedestrians

#670

Name: Dunzweiler, Dustin

Correspondence: Hi there,

I'm an equestrian, hiker and cyclist and have worked with many local public parks. I personally volunteer for the American River Parkway Foundation, American River Horse Patrol and the San Mateo County Horse Patrol. I value the open space and natural beauty the trails have to offer. It is important that the experience be maintained for everyone hikers, equestrians, the disabled etc. Unfortunately, many cyclists tend to speed down hill as one naturally would, the trails have blind corners couple this with a general lack of understanding on how to pass equestrians while on the trails, by cyclists, is a major public safety concern.

Near and actual hits pose a real risk to visitor safety and does not foster a good experience. The bikers already have many trails where equestrians are already not allowed. Adding more trails for cyclists limits the experience available to other users and is very one sided. When cyclists are added to hiking trails you're not giving more access you're taking away access from those who choose traditional methods of enjoying our wonderful parks.

#671

Name: Cressa, James

Correspondence: Put simply, if cows can graze the land but cyclists in general & off road cyclists specifically are restricted and denied access as current policy clearly dictates, this is irrational and wrong. Do some research on the many successful government/public access projects already in place elsewhere. Not in wilderness but again, the contrast between bovine grazing but the land is too sensitive for bikes? Thanks in advance for the forward thinking considerations. JDC

#672

Name: Serna, Jack

Correspondence: A new trail between Devil's Gulch and Platform Bridge through Cheda, McIsaac and Zanardi Ranch. A plan to connect the Cross Marin Trail into Point Reyes. Adoption of social trails off Bolinas Ridge for better connectivity and a single-track trail experience. Extend the Olema Valley Trail to Bolinas on the east side of Highway 1. Close gaps for bikes through ranch lands in the park, including closing the Estero Trail loop, connecting Sir Francis Drake Blvd. with Pierce Point Road and connecting Marshall Beach to Pierce Point Road, A more bike-friendly permit application process for road and mountain bike events in the park, including along Bolinas Ridge and out to the lighthouse. Bike access to all ranch roads in the pastoral zone that are already open to pedestrians.

#673

Name: Dee, Ed

Correspondence: A new trail between Devil's Gulch and Platform Bridge through the Cheda, McIsaac, and Zanardi Ranches.

A plan to connect the Cross Marin Trail into Point Reyes.

Adoption of social trails off Bolinas Ridge for better connectivity and a single-track trail experience.

Extend the Olema Valley Trail to Bolinas on the east side of Highway 1.

Close gaps for bikes through ranch lands in the park, including closing the Estero Trail loop, connecting Sir Francis Drake Blvd. with Pierce Point Road, and connecting Marshall Beach to Pierce Point Road,

A more bike-friendly permit application process for road and mountain bike events in the park, including along Bolinas Ridge and out to the lighthouse.

Bike access to all ranch roads in the pastoral zone that are already open to pedestrians.

#674

Name: Russell-Hurd, Lee

Correspondence: The Letter Ranches are historic and so they should stay. However, they should all be as green as possible, organic and sustainable. Just because they are farm businesses doesn't mean they should destroy the Park roads, let cows and cattle roam wherever, nor should they profit off NPS property without some of the money going back into managing the government lands. The Elk must not be killed! They purposefully reintroduced them, and now both the Ranches and Park Service must manage the herds. The fence on Pierce Point will work for awhile, but as for the Drakes Beach herd and future planning, the herd should be allowed to live as they are. If the locals and Ranches don't like it, tough. They are lucky to have their 20 year leases and honestly in 2038 dairy and beef Ranches might be obsolete anyhow. As for the other funding and responsibilities of the NPS, Ranches and adjacent locals, more funding and maybe even more fees are necessary. There are so many historic buildings, houses, and recreational areas being wasted by letting them rot/be vacant. Most of them are historic structures, but I say if they're not going to maintain or fix those structures then get rid of them some how or let it be known that they're not in limbo and will slowly get destroyed by the coastal forest. Lastly, I just hope Point Reyes National Seashore gets more funding in general and allocates them wisely to the right projects. I like how the light house is being repaired but is it really worth it to have the most popular place in PoRe closed so long to do it? The public should have its say and I'm fully aware that businesses and the local community rely on private enterprise within the Seashore, but ultimately it's NPS land, wilderness must be treated as such and the core mission to protect and preserve this wonderful area must take precedent. Hopefully a smart balance can be reached

#675

Name: Breisky , Laura

Correspondence: The bicycle coalition has been aggressive in pursuing access to trail throughout Marin County. Bicycles make roads dangerous because they are too slow to coexist with motorised vehicles. They make walking paths dangerous because they are way too fast for pedestrians, particularly children and pets. They are dangerous for equestrians because they scare horses. Bicycle use in Point Reyes should be limited for the safety and relaxed use for the everyone who enjoys a peaceful and safe experience in the park.

#676

Name: ruff, stephanie

Correspondence: We are a family of mountain bikers- We used to vacation at Point Reyes years ago before we were into biking. Now we chose bike friendly places to visit or vacation at. when I saw this was so excited- would love to return and be able to bring my bike!! please consider:

* A new trail between Devil's Gulch and Platform Bridge through the Cheda, McIsaac, and Zanardi Ranches.

* A plan to connect the Cross Marin Trail into Point Reyes.

* Adoption of social trails off Bolinas Ridge for better connectivity and a single-track trail experience.

*Extend the Olema Valley Trail to Bolinas on the east side of Highway 1.

* Close gaps for bikes through ranch lands in the park, including closing the Estero Trail loop, connecting Sir Francis Drake Blvd. with Pierce Point Road, and connecting Marshall Beach to Pierce Point Road,

*A more bike-friendly permit application process for road and mountain bike events in the park, including along Bolinas Ridge and out to the lighthouse.

* Bike access to all ranch roads in the pastoral zone that are already open to pedestrians. thank you-sincerely,
Stephanie Ruff

#677

Name: Slaughter, Daniel

Correspondence: I firmly support improved bicycle trail access in the Bay Area and Pt Reyes National Seashore. Here are my suggestions:

A new trail between Devil's Gulch and Platform Bridge through Cheda, McIsaac and Zanardi Ranch.

A plan to connect the Cross Marin Trail into Point Reyes.

Adoption of social trails off Bolinas Ridge for better connectivity and a single-track trail experience.

Extend the Olema Valley Trail to Bolinas on the east side of Highway 1.

Close gaps for bikes through ranch lands in the park, including closing the Estero Trail loop, connecting Sir Francis Drake Blvd. with Pierce Point Road and connecting Marshall Beach to Pierce Point Road,

A more bike-friendly permit application process for road and mountain bike events in the park, including along Bolinas Ridge and out to the lighthouse.

Bike access to all ranch roads in the pastoral zone that are already open to pedestrians.

#678

Name: Warne, Karen

Correspondence: This is to ask that you please protect the Pt Reyes trails, which are truly a treasure to so many of us Northern California. The use of some of these trails should be kept for equestrians and hikers only, particularly when it is realized that bicyclists already have use of 75% of the trails in that area. The peace, the solitude, and the rawness of the natural setting would be significantly impacted if all trails were open to bikes. The speed at which the bikes travel would impact hikers and equestrians alike. Although I do not mind sharing trails with other users, to have a portion of the trails that can be enjoyed on foot or horseback without looking over a shoulder, or being on guard at the bends in trails, is important. I ask that you consider this request. Respectfully, Karen warne

#679

Name: Wiggins, Jeremy

Correspondence: Pt. Reyes National Seashore is one of Marin's greatest natural assets. But for far too long, access in the National Park has been severely limited.

A new trail between Devil's Gulch and Platform Bridge through the Cheda, McIsaac, and Zanardi Ranches.

A plan to connect the Cross Marin Trail into Point Reyes.

Adoption of social trails off Bolinas Ridge for better connectivity and a single-track trail experience.

Extend the Olema Valley Trail to Bolinas on the east side of Highway 1.

Close gaps for bikes through ranch lands in the park, including closing the Estero Trail loop, connecting Sir Francis Drake Blvd. with Pierce Point Road, and connecting Marshall Beach to Pierce Point Road,

A more bike-friendly permit application process for road and mountain bike events in the park, including along Bolinas Ridge and out to the lighthouse.

Bike access to all ranch roads in the pastoral zone that are already open to pedestrians.

#680

Name: N/A, Local hiker

Correspondence: I don't agree to any bicycles on trails, or connecting to trails at PRNS. I have lived in areas of the Northern Sonoma Coast where this was a major problem, where bicycles go where they choose, as fast as they want, regardless of the signs posted allowing some areas and not others. Bikes cause a lot of erosion on the trails and there is no way to maintain them when there is rainy season. I gave up hiking those trails because I became upset with people nearly running our family over with their bicycles on the trails and their dogs off leash that would engage with out dog on leash. Horses are more enjoyable, and complement the environment.

Go ahead and try crossing the street at Mesa road and Highway 1 at the crosswalk, by the WMCS Thrift store to Wells Fargo on a Saturday morning and you will never get a bicycle to stop for a pedestrian. What makes you think they will yield to a hiker on a narrow trail? They won't. That is why they don't belong there.

#681

Name: Vargus, Jackie

Correspondence: Please keep Stewart's Ranch for equestrians. We have limits access to the trails at Point Reys. This is a safe place where we can camp & access The beautiful trails. I am handicapped & can't ride a bike or hike The trails. Horseback is my only chance to be on the trails. Please keep the trails open & accessible For all, not just A vocal group.

#682

Name: Shapiro, A

Correspondence: I've biked from the bay area to Pt Reyes many many times over the last 10-15 years. Its a fantastic natural resource and the best way to enjoy it is on foot, on a bike, and otherwise away from auto traffic.

I urge you to please work closely with MCBC - Marin County Bicycle Coalition - to extend bicycle access and recreation opporities in PT Reyes and beyond.

Extend trail access, bring a cohesive planning vision to what kinds of activity a person can do BY bike and ON a bike in the parkland!

#683

Name: Nelson, Mike

Correspondence: My family enjoys riding horses on the trails that do not include bicycle traffic. For safety reasons we choose not to ride on trails where bicycles can appear abruptly and potentially spook the horses. We hope that you will keep some trails bicycle free, to promote diversity in use and for safety's sake.

#684

Name: Matthews, Karen

Correspondence: Please keep bicycles off Pt Reyes trails.

#685

Name: McGuinness, B

Correspondence: The first time I visited Point Reyes almost three decades ago, I knew I'd come home. There seemed to be no place in the world with so much natural beauty and small town spirit. I guess I was biased. My husband and I weren't able to move here until 1996, and we had to struggle to make our living situation work. Our financial position was also precarious, since we were still working and putting ourselves through school. But being here was worth all the hardship. The hiking, kayaking, swimming, fresh air, peace & quiet; the unexpected pleasures of seeing bobcats, coyotes, countless harbor seals, fields of wildflowers; the suspense of wondering if a mountain lion or shark was nearby; the comeback of the elk.

We like the human community, but we're here for the park. I started volunteering for the Habitat Restoration program in the 1990s, took a long break, and then resumed volunteering about 4 years ago. I also volunteer for the Third Thursday Weeders. I have a degree in Environmental Horticulture, and I work as a habitat gardener. Plants are my thing, which is why I am disturbed by the sight of ranches grazed to dust and left bare for weeds. This doesn't seem to signify respect for the land or the public agency that holds the leases for that land. I know almost nothing about ranching, but I recently attended a symposium on fire ecology and grazing. The shepherds on various panels talked about moving their herds around, only leaving them in place for 1-3 days and then keeping them off that land for at least six months. Their methods increase plant diversity as well as the water-holding capacity and organic matter in the soil. So, it's possible to have both ranching and biodiversity together. But I'm not sure I've seen evidence of that in our park. Are the ranchers, who are incredibly privileged to have leases on public land, using this land responsibly? Are their herds too big to be supported in a way that is sustainable, never mind beneficial, and adheres to the National Park Service mandate to "... preserve(s) unimpaired the natural and cultural resources and values of the National Park System for the enjoyment, education, and inspiration of this and future generations."? Hmm.

Fences would impair the natural resources by limiting the elk range and perhaps interfering in unforeseen ways with other animals, and I stand firmly against allowing such fences in our national park. Is there any other way to keep the elk from eating the hay bought for the cows? Could the hay be stored in barns or protected by tarps? Or could the ranchers accept the loss of hay as the cost of doing business in a national park where the rent is effectively subsidized by the public? Us. Some ranchers undoubtedly value their relationship with the national park and cooperate fully in the care of this beautiful place, and their presence is a boon. Other ranchers, however, seem to resent the park, and this antagonism is bad for all of us.

I understand that there's an educational benefit to having working ranches, but that benefit is minimal compared to the benefit of having functioning ecosystems, especially in this world where species are disappearing at a frightening rate. Conversations about climate change have hit the mainstream, and we desperately need to start acting as though we believe the science. Will we continue to make even more concessions to ranchers impacted by

a hotter, drier climate even though their actions (and the abundant methane cows produce) could be accelerating climate change and exacerbating its ill effects? If we put the demands of the ranching community ahead of those of all the other park communities, human and otherwise, we will not be honoring the mandate to protect these resources for the future. In addition, the history of the ranches is not the only human history we should be celebrating. I would love to see a greater emphasis put on the Native American history, and continuing presence, in this area. The educational value of doing so would be tremendous.

Furthermore, I can see no justification for allowing the ranches to expand their operations to include B&Bs or farms or any of the other proposals. What is the historical value in having any of that on public land? We would, again, be subsidizing private profit and turning this community into a wildlife theme park where money is paramount and the animals are kept behind fences. The growing piles of toilet paper & other trash along the trails, the dogs running around areas where they're not permitted, the illegal bonfires and forgotten balloons on the beaches are all evidence that we need to focus more on educating our visitors. We need more signs, more interpretive rangers, more community outreach. We should be able to trust that the park service will protect our public land now and for the future. I dearly hope that the passage of Jared Huffman's bill (HR 6687) to extend the ranching leases does not mean that whatever benefits the ranches in the short term is automatically approved no matter what the consequences are for the rest of us. I would like to believe that my voice has as much power in a democracy as that of the loudest lobbyists. But I definitely believe that we should all work toward protecting our public land, which is why I'm grateful for this opportunity to share my opinion (and at such great length too). Thank you.

B. McGuinness

#686

Name: McClure, Robert and Ruth

Correspondence: November 23, 2018

Point Reyes GMP Amendment EIS Superintendent Point Reyes National Seashore 1 Bear Valley Road Point Reyes Station, CA 94956

Dear Superintendent:

The McClure Family appreciates the opportunity to comment on the Point Reyes National Seashore (PRNS) and North District of Golden Gate Recreation Area (GGNRA) General Management Plan (GMP) Amendment process and submits this response to the NOI to prepare an environmental impact statement for a General management Plan (GMP). 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.

We have reviewed the alternatives currently presented by NPS. The three Settlement Required Alternatives will have huge negative impacts on the ranches, the ranchers and their families, the employees and their families, the local community and neighboring areas as well. With reduced or no ranching in the PRNS, nearly 100 families will be displaced. This would result in possible closure of support services for the ranches to operate such as feed mills, veterinary services and ranch supply companies because of reduced business/lack of volume and lack of critical mass from fewer customers. Additionally, local schools would be impacted as a result of significantly lower enrollment which may result in the closure of local schools. Because of the displaced families, other local businesses, such as doctors, hardware store, grocery stores, veterinarians and the pharmacy will be impacted as will service providers such as plumbers, electricians, etc.

We envision a somewhat expanded alternative building off the "Continued Ranching Alternative" proposed by NPS whereby NPS would allow for limited additional opportunities in farming and diversified agricultural production which is historically and culturally consistent on these agricultural properties, to complement existing ranching and dairy activities. We believe that such limited additional uses would provide multiple economic and educational benefits to the community and would strengthen the overall local food supply and local economy of our region. We are not proposing in this alternative expanding beyond the current 28,000-acre agricultural property. In addition, under this alternative, NPS should consider a somewhat longer lease term (25-30 years) for ranches and dairies to facilitate investments in our agricultural infrastructure that will make us more productive, efficient, and protective of the environment. The added term can help us amortize such measures in a sustainable, long term fashion.

We also ask NPS to include an alternative or modify existing alternatives that would remove the free-range elk herds (Drakes Beach and Limantour) from the agricultural properties. This would provide the best solution for addressing ongoing conflicts that occur to historic ranching, and cultural resources. The 1998 Elk Management Plan provides for this and the nearly 20 years of mixed and frustrating results in implementing alternative practices to reduce conflicts in forage use and infrastructure upkeep demonstrate why this alternative has merit. The scoping notice description of alternatives is misleading in that it presumes today's extent of the elk herds is currently approved in the existing GMP. That said, we fully support continuation of Tule Elk in other areas within the Seashore.

All ranching alternatives should include provisions to more easily facilitate repairs or replacement of existing farm employee housing and facilitate the acquisition of additional housing that is unoccupied or underutilized within the Park. We also ask urge the park Service to consider the attached Community Alternative.

We ask that the additional Alternatives consider a range of alternatives that include the consideration of the complete removal of the free-ranging Tule elk herd from the pastoral zone by use of effective separation of elk from working ranches and dairies.

Some of the most important issues that we would like to see addressed within the range of alternatives that allow continuation of ranching and farming include:

Leases: We welcome the opportunity to engage in a 20 year permit. This will allow us security for our business continuity. It will allow us to continue to make long term improvements to the ranch. The 20 year term is important in order to secure funding for the capital projects from banks and for us to get the full benefit of the improvements (i.e. Driveways, roofs, etc). We ask that consideration be made such that the ranches have renewable 10 year lease options that can be exercised at every 20 year midterm, allowing lease updates every 10 years and a new 10 year term added to the 20 year lease, but never exceeding 10 years into the future.

Operational Flexibility: We ask that guidelines be established that allow for action to be taken, without delay, on regular infrastructure, maintenance, repair and replacement such as fences, roofs, etc. and implementation of best management practices for agricultural and natural resource management.

Range management practices known to be effective for improving forage quality and quantity should be allowed for all ranches. These should include mowing, grazing, management intensive (rotational) grazing and seeding. Additionally, we believe that in certain cases, plowing, discing and reseedling may be the only way to eliminate invasive plant species such as velvet grass. Mowing of thistles is essential for control. Manure application is important as a fertilizer and must continue to be allowed to be applied in a responsible manner (appropriate rates, away from waterways). Some ranches may already have a Comprehensive Nutrient Management Plan in place through the Natural Resource Conservation Service. We ask that the ranchers be directly involved in the collaboration with PRNS and GGNRA staff to develop these guideline in the GMP Amendment process so that the end result is a decision making process that supports effective range management.

We ask for clarification of the Land Management Units as it relates to the Conservation Framework of rangeland and pasture on each individual ranch. Are rangeland and pasture areas currently identified on each ranch?

Diversification. Please consider allowing conversion to other livestock species (ex. Dairy to beef, etc) or other historic uses as market conditions dictate. Other examples could be consideration for diversification that include selected planted or naturally occurring crops, additional livestock productions, farm stands and retail sales, processing and value-added production, farm stays and farm educational tours.

Most dairies outside the Park utilize their ground for growing forage and is a key to sustainability. The cost of importing forage from places as far away as Eastern Nevada is costly and growing feed locally reduces the carbon footprint by eliminating trucking. We ask that those that are currently raising silage in the PRNS be able to maintain their acreage and those that wish to begin be allowed to raise up to 25% of their leased acres as silage. This farming practice also combines the benefit of utilizing and preserving seasonal forage production with effective weed management.

Succession. The ranch GMP Amendment should establish a procedure for lease succession in the event that the tenant dies or leaves the business. In order to keep the ranches in agriculture, preference should be given to immediate family members first. The continuation of agriculture in PRNS is critical to maintaining the current rural character of the entire North Bay area by maintaining critical mass for trade and agricultural services.

We ask that the lessee/rancher have a decision-making role when selecting who should succeed in the lease agreement.

Environmental Stewardship and Best Management Practices: We ask that the NPS collaborate with ranchers to establish programmatic approaches for streamlines implementation of best management practices. We believe this is critical to Operational Flexibility and successful management of the multiple resource objectives on PRNS and GGNRA ranches and farms.

EIS should include future opportunities to accomplish resource conservation through water quality, air quality, and soil management programs and partnerships. Some of these partner agencies include Natural Resource Conservation Service, Marin Resource Conservation Service, Bay Area Air Quality Management District, UC Cooperative Extension and USDA Farm Service Agency.

With respect to methane and climate change, we believe the GMP/EIS should address how local ranches and dairies may play an important role in mitigating such impacts, potentially through carbon offsets and other payments for environmental services. Marin County and the State of California are leaders in this area and we welcome the opportunity to work with them as part of this effort. We also believe that a variety of public and private partners may provide important technical and financial resources to assist in this effort. NPS and the ranching community at the Seashore can develop state-of-the-art approaches and serve as a model for programs elsewhere.

Information and Analysis from Previous Planning and Scoping Efforts: Ranches in the PRNS have participated in previous public comment and scoping periods during the development of a full GMP Update in the early 2000s and in the involved and thorough process to develop the Ranch Comprehensive Management Plan from 2012-2015. That earlier scoping and environmental analysis studied many, if not all of the topics introduced in this first phase, producing relevant information, details, and options for the successful mutually beneficial continuation of the PRNS and GGNRA historic cultural resources. We ask that this information be considered and used during the GMP Amendment process of development of the Draft EIS.

Sincerely,

Robert J. McClure Historic I Ranch

THE COMMUNITY ALTERNATIVE: CONTINUED RANCHING AND MANAGE ELK FOR EFFECTIVE SEPARATION FROM RANCHES Based on the purpose and need for action, the Community proposed action includes the following elements: " Issue agricultural lease/permits with 20-year terms to existing ranch families to continue beef and dairy and associated agricultural operations on approximately 27,000 acres within the planning area. " 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 Commissioners 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. " Explore opportunities for ranch operational flexibility and diversification, establish up to approximately 900 acres of collaboratively managed resource protection buffers, and provide a programmatic review and approval process for operational flexibility, diversification and best management practices. " Tule elk would be managed for effective separation from ranches. No elk herds would be allowed to establish in the planning area. " The NPS would implement a strategy prioritizing maintenance of historic buildings on ranches in collaboration with seashore ranchers. Prioritization would take into account historic preservation goals and the needs of ranch operations. In some cases, adaptive reuse of historic buildings would be considered to support diversification activities. " NPS would implement strategies to remove non-native, invasive plants and to manage special status plants in collaboration with seashore ranchers. " Strategies for the management of historic ranch complexes within the planning area but not part of currently active ranch operations would be identified including: prioritization of specific buildings, structures, and landscapes for preservation based on their importance to the overall integrity of the historic district and opportunities for adaptive reuse. As appropriate, the seashore would evaluate potential for decommissioning/deconstruction of low priority or substantially degraded structures/complexes as part of this plan. The community proposed action represents one alternative that should be considered during the EIS process.

#687

Name: Sherman, Ken

Correspondence: I am so happy to see the NFS addressing this. I am very much in favor the proposed trail upgrades and particularly believe the time has come to expand MTB trail access, particularly single track.

Please make provisions for Class 1 (no throttle) eMTBs. Wide ranging eMTB trail access seems to be the approach through much of Europe which started from an engrained bike culture. It certainly could work well here also and might be made much easier if trail managers would adopt the Fed and State recommendations that Class 1 bikes are to be considered non-motor regular bikes. At present, we seem to have a wide mish-mash of regulations that are not addressing any defined problem.

Thanks for the great proposals.

#688

Name: Roberts, Michael

Correspondence: I am a resident of Marin County, California, and frequent user of the abundant public lands near my home. My first job out of college was working as a natural history educator in the GGNRA. Today, as a father of three young boys. I'm a passionate believer in the idea that we must evolve our public lands policies to address the desires and needs of younger generations. For this reason, I'm writing to voice my support for the Marin County Bicycle Coalition's call for new biking trails and pathway connections within the Point Reyes National Seashore. I support all seven of the coalition's priorities, which are:

1. A new trail between Devil's Gulch and Platform Bridge through the Cheda, McIsaac, and Zanardi Ranches.
2. A plan to connect the Cross Marin Trail into Point Reyes.
3. Adoption of social trails off Bolinas Ridge for better connectivity and a single-track trail experience.
4. Extend the Olema Valley Trail to Bolinas on the east side of Highway 1.
5. Close gaps for bikes through ranch lands in the park, including closing the Estero Trail loop,

connecting Sir Francis Drake Blvd. with Pierce Point Road, and connecting Marshall Beach to Pierce Point Road, 6. A more bike-friendly permit application process for road and mountain bike events in the park, including along Bolinas Ridge and out to the lighthouse. 7. Bike access to all ranch roads in the pastoral zone that are already open to pedestrians.

As a teenager, I explored the Marin Headlands by bike in the early 1990s. Today, I enjoy biking with my sons on the trails of Marin-no other activity gets them more excited about being outside. I have long wished that we had more options for biking on trails in Pt. Reyes. I urge the National Park Service to strongly consider the thoughtful suggestions of the Marin County Bicycle Coalition.

Sincerely, Michael Roberts

#689

Name: Donaghy, Melanie

Correspondence: Please do not allow more bikes in point Reyes. The narrow tires cause erosion, their speed is detrimental to hikers and equestrians. There are hundreds of miles of bike trails in Marin, none of which the bikers pay for. I vehemently oppose opening even more access to bikes.

#690

Name: McIntosh, Lori

Correspondence: I have been hiking Pt. Reyes for 20 years and riding it as an equestrian for 12 years. I moved here from Virginia as there is very limited public land on the East Coast. The trails are spectacular for both activities and give me peace of mind that no one will be flying around a corner and potentially pushing me off the edge. I have had some very intense and dangerous run ins with mountain bikers as a very friendly endurance rider. Fort Ord and San Mateo county mostly... and Santa Clara county. I am extremely appreciative of those who dont speed, dont wear headphones and pull off to the side when I approach. If only at least 50% were like that in the entire Bay Area and beyond. I ride young inexperienced horses, older horses in rehab, and ride when Im recovering from an injury and not 100 %. The majority of my rides are on an experienced fit confident horse along with myself, however, I still have concerns as a young 50 female. There is absolutely nothing more frightening than potentially going over the edge on a very tall quick Arabian horse. The only time I have fear is when I see a biker. Even the brakes squeaking to stop can push my horse over. There is almost nothing left for horse riders on the trail. I do know mountain biking started in the 1980s and horses on the trail have been here all along. Please dont push us out. There will be less riders, less horses, and less land for us to explore. In the end, all the horses will be gone and the funds from Equestrians Who help support the trails.

#691

Name: Breisky , Laura

Correspondence: If the dairy farms can't coexist with the native Tule Elk, perhaps their leases should not be renewed. Killing native wildlife is not an appropriate solution.

#692

Name: Carlsen, Torv

Correspondence: Bicycle access to the roads birth paved and unpaved in the Pt. Reyes area will enhance public enjoyment of our shared natural environment. Common sense dictates that cyclists should enjoy the same access as other users to these multi-use trails and roads and paths.

#693

Name: Bachman, Melanie

Correspondence: Safety: How do you plan to keep hikers and equestrians safe from the fast-moving mountain bikes and road cyclists? Safety: You would like a social trail with hikers and equestrians off Bolinas Ridge for better connectivity and a single-track trail experience.

Safety: at Bolinas Ridge and out to the lighthouse : Parking cars are already parking on the side of the road that's not legal or safe Pedestrians You would have pedestrians walking along the side of the roads to have access to the new Bolinas Ridge and out to the lighthouse.

Safety and Money: Bike-friendly trails with hikers and horses on the same trails are not safe. It seems you would like more bike-friendly \$\$ permit \$\$ application process \$\$ for road and mountain bike events in the park,

Maintenance: Who will maintain to integrity of the land / trails / earth?

#694

Name: Rabin, Ariel

Correspondence: I would like to show my support for more bike access in Point Reyes. All of the trails in Point Reyes region and West Marin have a very special quality - Bear Valley, Wildcat beach and Drake's Head and Estero (among others) are all fantastic and so beautiful. I have very rarely seen other bikers and hikers along them and I don't believe that increased bike trails and access would lead to increased bike traffic and trail congestion. If anything it would spread trail users out and create better loops and connectivity for everyone. Please consider opening new trail to bikes! Thank you for the consideration and discussion.

Best, Ariel Rabin

#695

Name: N/A, Kristina

Correspondence: Please protect the few trails that are closed to bikes. I am a hiker and equestrian and bikes are a dangerous menace either way. I have had a biker ram into my friends horse saying we don't have the right of way even though we were off to the side and he had plenty of room. I have had bikers whizz up behind me when I'm hiking for no reason except the pleasure of startling me and impatience not to wait until I get out of the way.

Bikers already dominate too much wilderness, please leave some trails wild.

Thank you, Kristina

#696

Name: Montenero, Ernesto

Correspondence: Dear NPS: Thank you for updating the PRNSS bike access. We've been looking forward to seeing the park have better bike access and are appreciative of the chance to provide input about more improvements. I feel that Bike Access in the park has not kept pace with the increased visitor interest. I have enjoyed riding on most of the Sea Shore's roads and trails for the last 25 years and see more and more people who are discovering the joys of riding in this beautiful area and of getting to the parks via bicycle (rather than car). I see some really great opportunities to improve bike safety, access, and experience in the park with a minimal capital outlay.

I would like to add my support to the Marin Bike Coalition priorities listed below. A connected bike trail system will really allow visitors the chance to enjoy the park away from the car noise, danger, and pollution. More bike

access on gravel park roads and trails will reduce the total impact on wildlife and the ecosystem of the park by reducing the vehicular traffic. More people will choose to ride if it's safer and more convenient.

All roads in the park should have bike lanes or preferably separated bike paths. A separated bike path parallel to Highway 1 will make it possible for families to ride to the park.

The NPS Bike access study should consider re-enstating daily bike access on Sir Francis Drake Rd. to the Light House. It is a beautiful road to ride and bicycles are a low impact way for visitors to enjoy the road.

I believe that the large diesel buses that have been running on Sir Francis Drake Blvd. are not a good match for the park and the road, and that smaller CNG shuttles will reduce the impact on the road, will be safer, and will be easier to share the road with bikes.

If bike access is improved and it is safe to ride to and in PRNSS, more people will choose to ride, reducing the impact of vehicular traffic thereby reducing the air emissions and the water pollution from the roads into the creeks and improving the ecosystem health.

Thank you so much for taking the bike community's input into consideration. We appreciate all your efforts on our behalf. The park is a wonderful treasure we are all lucky to have.

Marin Bike Coalition priorities:

A new trail between Devil's Gulch and Platform Bridge through the Cheda, McIsaac, and Zanardi Ranches.

A plan to connect the Cross Marin Trail into Point Reyes.

Adoption of social trails off Bolinas Ridge for better connectivity and a single-track trail experience.

Extend the Olema Valley Trail to Bolinas on the east side of Highway 1.

Close gaps for bikes through ranch lands in the park, including closing the Estero Trail loop, connecting Sir Francis Drake Blvd. with Pierce Point Road, and connecting Marshall Beach to Pierce Point Road,

A more bike-friendly permit application process for road and mountain bike events in the park, including along Bolinas Ridge and out to the lighthouse.

Bike access to all ranch roads in the pastoral zone that are already open to pedestrians.

#697

Name: Northall, Claire

Correspondence: I want to voice my support for the following projects:

A new trail between Devil's Gulch and Platform Bridge through the Cheda, McIsaac, and Zanardi Ranches.

A plan to connect the Cross Marin Trail into Point Reyes.

Adoption of social trails off Bolinas Ridge for better connectivity and a single-track trail experience.

Extend the Olema Valley Trail to Bolinas on the east side of Highway 1.

Close gaps for bikes through ranch lands in the park, including closing the Estero Trail loop, connecting Sir Francis Drake Blvd. with Pierce Point Road, and connecting Marshall Beach to Pierce Point Road,

A more bike-friendly permit application process for road and mountain bike events in the park, including along Bolinas Ridge and out to the lighthouse.

Bike access to all ranch roads in the pastoral zone that are already open to pedestrians.

#698

Name: Levin, Jeff

Correspondence: Dear Sir: We have read in horror about a proposal to cull the Tule Elk herd, in Pt. Reyes National Seashore, by killing elk. We know that a half million tule elk once thrived in central California until nearly driven to extinction by hunters and farmers. Also, we have learned that the herd made a remarkable recovery with the creation of the 2,600-acre Tomales Point Elk Reserve at Pierce Point, since 10 tule elk were moved there, in 1978. We moved to Marin at that time, and have considered visits to the park, to view the elk, one of the greatest treasures and pleasures in our lives. We plead with you to explore and employ every option other than killing elk, in their competition for pasture land with local farms. We can promise you that there are no visitors coming to the park to smell the cattle, even if their ranches are now historical sites. Good fences make good neighbors. Restoration of the Tule Elk herd is a great park service success. Perhaps other National Parks would welcome some of our elk to be relocated to them. Native wildlife diversity in the park is essential as part of our national legacy. We owe it to our children, grandchildren, and generations to follow to conserve the richness of our wonderful county and state. Commercial interests never should be our highest priority, in the stewardship of our National Parks. Thank you for protecting the majestic tule elk herd. Sincerely, Jeff Levin, LCSW and Cynthia Friedman, MFT.

#699

Name: klitz, karen

Correspondence: Dear Superintendent,

I am pleased to be able to provide the following comments as Point Reyes National Seashore prepares a General Management Plan Amendment and associated NEPA analysis. Please incorporate and address my comments in your planning.

Your scoping letter with its emphasis on several ranching alternatives reads like it was written for the Park by ranching interests and not by a land agency whose mission is to promote maximum protection of the native landscape and ecosystem and to protect its iconic tule elk. It is a violation of the NEPA process to rubber stamp a pre-decision. I will expect a thorough and honest environmental assessment.

The stated mission of the purpose of Point Reyes National Seashore is to be administered "without impairment of its natural values", in a manner "consistent with, based upon, and supportive of maximum protection, restoration, and preservation of the natural environment within the area". For this reason and others I oppose the issuance of new leases for ranching operations at Point Reyes National Seashore. The American public deserves to have maximum protection of this Park. Fences and other developments for livestock management should be removed. Tule elk should be allowed to wander freely. The agricultural zone should be restored to its original coastal prairie mosaic of native habitats, which the elk will assist as they have in the elk reserve at Pierce Point.

I support Alternative F No Ranching at Point Reyes National Seashore.

The following items and issues should be addressed in the Plan and the EIS:

Cultural Resources Include an inventory and condition of archeological features and protections they have received and will receive to prevent trampling, rubbing, urine, feces and other disturbances.

Provide a map and list of Historic Structures as listed under the California State Historical Building Code.

Vegetation Provide maps of vegetation types and the location of rare, sensitive and endangered plants. List the rare plant species within the Park, and assess the impact of continued livestock grazing on each of the rare plants species within the Park, following the California Natural Diversity Database lists.

Explain how imperiled plants will be protected.

Map the presence of exotic and invasive plants.

Provide a map of abundance of invasive species and analyze how each alternative would affect their distribution.

Describe the plan for restoration of native plant communities in agricultural zone.

Wildlife Explain how the management of tule elk to benefit private agricultural operations in the Park complies with 16 U.S. Code Section 1 which states the NPS mission 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 future generations."

Explain how any new infrastructure for agriculture will impact tule elk and other significant Park resources.

Explain how the limitation and removal of tule elk benefit the American public.

Provide a survey and status of native wildlife, including small mammals and predators.

List the rare animal species within the Park, and assess the impact of continued livestock grazing on each of the rare animal species within the Park, following the California Natural Diversity Database lists.

Report how tule elk, snowy plovers, salmon and other rare and sensitive wildlife are impacted by livestock, including issues of diet and disease.

Report the impacts of livestock on native fish and other native aquatic biota.

Given the near absence of black bears in the Park, describe how the Park will encourage and support their return.

Air Quality Report GHG emissions with and without livestock, including the use of machinery to manage livestock and to grow and transport imported forage.

Disclose the ammonia and noxious gas production levels from the beef and dairy facilities and their degree of compliance with the Clean Air Act and Regional Air Quality Management District guidelines.

Economics Report the costs and proportion of the Park budget to manage agricultural businesses in each Alternative. Explain how this will differ from current management costs of livestock in the park.

Analyze the effect on local economies with and without ranching, given that the Park Service has found only about 100 jobs in Marin tied to ranching operations at Point Reyes [1], whereas 2.5 million yearly visitors contribute over \$100 million to the local economy and provide long-term sustainable employment to roughly 1,244 people, representing \$54 million in labor income in 2017.[2] Monitoring If ranching is retained, the prior and proposed

monitoring of the agricultural zone should be stated, including specific schedules for assessing the effectiveness of actions.

Monitor the effectiveness of restoration methods if ranching is not retained.

Livestock Explain how livestock production and crops conform to the purpose of the park of "maximum protection, restoration and preservation of the natural environment".

To obtain baseline data, show the calculation for the carrying capacity and suitability of different areas within the agricultural area for grazing by livestock and how these factors have changed since the 1980 GMP was produced and how they are likely to change over the next 20 years.

Report the amount of water and forage consumed, amount of liquid and solid waste of dairy operations.

Report the amount and types of supplemental feed trucked into the Park, where it is grown, and potential for introduction of invasive plants.

If livestock operations are retained, explain how the tons of livestock liquid and solid waste produced will not affect the coastal prairie ecosystem.

Explain how the proposed row crops and livestock diversification for private income in the Park will benefit the American public.

If agriculture is retained, and guard dogs are used, explain how this serves the public interest in viewing wildlife and natural processes.

Describe the types of forage crops grown, the accompanying weeds, and amount of fossil fuel used to produce the crops.

Report the presence and rate of brucellosis in livestock currently in the Park.

Provide a map of all infrastructure used to manage livestock, such as fences and water developments.

Current management of livestock should be disclosed, including Park response to resource conditions.

Explain the advantage to the public of issuing 20-year leases instead of 10-year leases, as proposed in Alternative.

Explain how livestock production is a rare activity that deserves protection inside a national park.

Show how livestock benefit the coastal prairie community.

List other locations in California where the coastal prairie on public land receives protection.

Explain how the agricultural area exhibits the natural balance of the native prairie and the purposes for which the Park was created.

Water Report the quality of runoff waters in the agricultural area, including Bolinas Lagoon and Tomales Bay, and report degree of compliance with water quality standards as well as measures taken to reduce or eliminate any effects.

Provide maps of riparian areas, meadows, water developments and the documentation of their condition, including water quality and fecal coliform bacteria, sedimentation, and condition of banks and vegetation.

Soil Consider the impacts of livestock to all soils in the agricultural area.

Climate Change Justify the production in the Park of greenhouse gases from livestock, which are estimated to contribute 14.5-18% of emissions causing climate change [3].

Provide information of how the Park plans to deal with impacts of climate change such as drought, higher temperature, water resources, availability of forage and increased wildfire risk.

Report the science of how cattle decrease carbon sequestration by suppressing or eliminating native perennial bunchgrasses and their large underground biomass of roots.

Given that livestock may increase the intensity of wildfires by altering the shrub/forb plant community and increasing invasives, how will the Park mitigate this risk if agriculture is retained?

General Explain how the alternatives are based on the best available science.

As part of the background, the original buyout costs of public money should be documented and the terms and conditions explained.

What indicators are used presently, or should be considered in the future, to measure resource conditions?

Values Analyze the impact of livestock on the wilderness character of the Park, on scenic and wildlife habitat values in an unspoiled state.

Sincerely,

Karen Klitz

Citations [1] Economic Impacts Study, Point Reyes National Seashore, FINAL REPORT, National Park Service. https://www.nps.gov/pore/learn/management/upload/planning_economicimpacts_final_061211.pdf. [2] <https://headwaterseconomics.org/dataviz/national-park-service-units/>, then select Point Reyes NS from Filter by National Park Service Unit; data from 2017; also: https://www.nps.gov/pore/learn/news/newsreleases_20140303_pore_tourism_economic_benefits_2012.htm

[3] <https://www.nytimes.com/2018/01/25/climate/cows-global-warming.html>

#700

Name: Giandomenica, Steve

Correspondence: Hi, please support adding more cycling options for Point Reyes. I recall riding in Durango, CO, where they had created trails for hikers and trails for cyclists. I'm not saying we must do this but my point is where there's a will there's a way to support vs few. Thank you.

#701

Name: N/A, Public Comments

Correspondence: A1: Environmental Review and Monitoring. -Why do we preserve "historic" worn out buildings? -Free Roaming elk should be a priority at Pt. Reyes. Free roaming heritage goats should be a priority. -Ranches are worn down maybe because they knew leases were running out after 20 years. -Explore the use of historic structures as wildlife habitat (eg. Barn owls at D Ranch) A2: Exploring regenerative practices for rangeland management and ranchers (carbon farming); consider diversity of ranch practices for land and economic health. - A compromise of all of the alternatives, to make one good one. -Explore the possibility of running one large beef

herd on the contiguous landscape using rotational grazing practices because it would be more beneficial to the landscape and would mimic the movement of past ungulates. A3: Explore use of experts in range management, wildlife management, agriculture, by developing working partnerships with other organizations. -Explore options for sustainable and environmentally friendly dairies; also explore partnerships with organizations willing to support the transition. -Contraception for elk: explore current use of PZP and potential partnerships with other animal welfare organizations to provide a management tool. -Explore effectiveness of lethal removal of elk as a population management tool. A4: Explore animal welfare concerns and effectiveness for population management with elk relocation. -Is there a long-term plan for elk leaving the park and how it affects the county? B1: Don't shoot the elk. -We want to harvest the elk. -The elk were here first. -Harvest elk and send them to our local community food bank. -Move elk off of pastoral lands and into wilderness area. -Move elk down toward Bolinas Lake Ranch. C1: Alt-E- Remove Cattle Permanently From Dairy Operations -Explore Contraception for Tule Elk -And consistent policy for ranching policies on predator control to be part of park policy -Alt D Best Option- and Include tule elk management education for ranchers to help with elk -Share monitoring effort -Replace cattle with goats -donate goats to food bank C2: Address lack of water and sustainability of dairies -Do a full environmental impact report -Increase communications with and between stakeholders during planning process -clearly define/analyze economic impact from loss of dairies (est 18%) of agricultural production; 22% with beef -Explore use of wildlife friendly fencing for tule elk versus ranching coexistence strategies C3: Expand current wildlife friendly barriers used for tule elk -Explore use of electric fencing -Incorporate partnerships with other agencies with experience in wildlife coexistence strategies -Explore volunteer vet students providing vasectomy to bull elks -wolf introduction for elk control -build wildlife friendly fencing to keep elk in a permanent area where they could live in peace from hazing and be managed in a more natural setting. C4: Dairy + explore climate beneficial dairy practices. -allow for on-farm diversity and multispecies grazing and pasture cropping and farming plans. - Build a creamery to produce butter that is sailed to SF market (historic practice) -Encourage educational outreach and connection to old food shed.

-It would be neat if the KPH radio receiving station was made into a museum. Consult Caraola Derooy for the vision. -D Ranch- ideal site for car campground, and/or tent cabins. -near Ken Patrick VC, future stone to provision camper's needs -Great vistas -A simple path to Drake's Estere waters edge could provide kayak-in camping -Pave L Ranch, Oyster Farm, Mesa Rds, other gravel/dirt used by visitors -campground in old Christmas tree farm -North/South Route or trail crosspark (east/wst) route or trail can be low maintenance road -A N/S Trail or trail connectivity, could be a long-range "dashes on a map" that's filled in over 50-100 years -Do more with Laird's Landing: interpretive displays, picnic tables, tree management, trail maintenance. -Share information at the visitor center and elsewhere about local agriculture and foodsheds -Turn unused historic buildings in the planning area into interpretive centers for public use and enjoyment. In addition, they can be used as hostels. - Road improvement and watershed restoration at low point on way to lighthouse -North-South trail alignment. Objective: connect Tomales Point Trail to Estero Trail (Est. T. is gateway to entire southern trail neutrals) - Alignment will originate at Pier a Pt. Real, east to Tomales Bay coast then south along Tomales Bay to connect to northernmost extension of L Rach Road. Connect across old ranch roads to Estera Trail. -If the ranches were model facilities open to the public where by the public could see first hand how farming is conducted. -Identify potential off-leash dog walking areas. -more mushroom walks and talks -wild foraging ID and cooking potlucks? - Camping for disabled people and autistic kids.

#702

Name: Schinner, Miyoko

Correspondence: Marinites love to refer to the ranches in Point Reyes as historic, but we have to remember that long before cattle were brought here, the land was open and free to many different kinds of wildlife that no longer exist or have dwindled in numbers. Animal agriculture is one of the leading causes of wildlife habitat, land degradation, and water use, contributing greatly to climate disruption. We have an opportunity now to reverse that and return Point Reyes to as natural and close to its original state. Instead, it appears that politicians and the Park Services are more interested in helping out a handful of dairy farmers producing an agricultural product in swift decline (milk sales have been declining 2% annually since the 1970s). A recent study showed that most dairies in the US make more money from government subsidies than from actual dairy sales. On the other hand,

the alternative milk category is rapidly growing, currently taking 15% of the fluid milk market share, and will only continue to grow. Supporting an arcane industry at the cost of the environment is a poor decision that we will come to regret over time as climate disruption continues.

As much as we love to pretend that the organic dairy farmers are good stewards of the land (and they are in comparison to factory farms), a meta-study of 40,000 farms shows that it is still not as good as growing crops or letting the land return to normal. The key take-away in the Oxford-University led study, published last year in a paper called *Grazed and Confused* is summed up by one of its authors here:

This report concludes that grass-fed livestock are not a climate solution. Grazing livestock are net contributors to the climate problem, as are all livestock. Rising animal production and consumption, whatever the farming system and animal type, is causing damaging greenhouse gas release and contributing to changes in land use. Ultimately, if high consuming individuals and countries want to do something positive for the climate, maintaining their current consumption levels but simply switching to grass-fed beef is not a solution. Eating less meat, of all types, is.

I will never understand the political support of a handful of families in a dying industry at the cost of environmental degradation that impacts all. Let the leases expire and return the land to the elk, deer, coyotes, and other wildlife that have more right to the land than the cattle we introduced when we invaded this land and took it from the gentle people who lived here.

Miyoko Schinner

#703

Name: Cooley, MaryAnn

Correspondence: I am a frequent visitor to Point Reyes National Seashore and appreciate the history of the ranches. I fully support The Community Alternative: Continued Ranching and Manage Elk for Effective Separation From Ranches Based on the purpose and need for action, the Community proposed action includes the following elements:

- Issue agricultural lease permits with 20-year terms to existing ranch families to continue beef and dairy and associated agricultural operations on approximately 27,000 acres within the planning area.
- 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.
- Explore opportunities for ranch operational flexibility and diversification, establish up to approximately 900 acres of collaboratively managed resource protection buffers, and provide a programmatic review and approval process for operational flexibility, diversification and best management practices.
- Tule elk would be managed for effective separation from ranches. No elk herds would be allowed to establish in the planning area.
- The NPS would implement a strategy prioritizing maintenance of historic buildings on ranches in collaboration with seashore ranchers. Prioritization would take into account historic preservation goals and the needs of ranch operations. In some cases, adaptive reuse of historic buildings would be considered to support diversification activities. NPS would implement strategies to remove non-native, invasive plants and to manage special status plants in collaboration with seashore ranchers.
- Strategies for the management of historic ranch complexes within the planning area but not part of currently active ranch operations would be identified including: prioritization of specific buildings, structures, and landscapes for preservation based on their importance to the overall integrity of the historic district and opportunities for adaptive reuse. As appropriate, the seashore would evaluate potential for decommissioning/deconstruction of low priority or substantially degraded structures/complexes as part of this plan. The community proposed action represents one alternative that should be considered during the EIS process. Thank you for the opportunity to provide these comments.

#704

Name: Dent, Susan Sidney

Correspondence: I am at a loss to know why you are even considering this action after the 2015 revelation that 250 animals died on your watch. Now the number of elk have declined and the park service seem to be pandering to the ranchers who insist on increasing their herds. The cattle you allow, now 5000, are more damaging to the seashore than the wild elk. Have you ever produced an environment impact report on how increasing the number of cattle will affect the topography? The ranches on Point Reyes distract from beauty of the wilderness. I was shocked to see the huge metal roof on my drive to Tomales point. Why was that building permitted? Please consider using the farms steads as hostels for tourists since Tourism brought in\$ 565 million in 2017 for Marin while Agriculture brought\$ 87.2 million. The beauty and wildlife of the park are the attraction and more profitable than cattle. There seems to be little interest in contraception for the elk. I learned from David Press that the females need to be treated annually. So why not treat the males? Castration weaks their antlers and disrupt hormones. Why not vasectomies? Please consider this. Sedate the bulls and perform the procedure in the field. The sperm count drops slowly so do the procedures well before rutting season. Also since the land was taken from the Miwok nation have they had input to your plans?

#705

Name: Rumm, Christopher

Correspondence: Please limit bicycle usage to dirt roads as currently managed. Areas such as the Ridge trail and adjoining side trails should not be opened to mountain bikes and mountain bike events as certain special interest groups demand.

#706

Name: Bense, Booker

Correspondence: A new trail between Devil's Gulch and Platform Bridge through Cheda, McIsaac and Zanardi Ranch. A plan to connect the Cross Marin Trail into Point Reyes. Adoption of social trails off Bolinas Ridge for better connectivity and a single-track trail experience. Extend the Olema Valley Trail to Bolinas on the east side of Highway 1. Close gaps for bikes through ranch lands in the park, including closing the Estero Trail loop, connecting Sir Francis Drake Blvd. with Pierce Point Road and connecting Marshall Beach to Pierce Point Road, A more bike-friendly permit application process for road and mountain bike events in the park, including along Bolinas Ridge and out to the lighthouse. Bike access to all ranch roads in the pastoral zone that are already open to pedestrians.

#707

Name: Bense, Booker

Correspondence: I fully support all these items. Biking is the reason I go to Marin.

A new trail between Devil's Gulch and Platform Bridge through Cheda, McIsaac and Zanardi Ranch. A plan to connect the Cross Marin Trail into Point Reyes. Adoption of social trails off Bolinas Ridge for better connectivity and a single-track trail experience. Extend the Olema Valley Trail to Bolinas on the east side of Highway 1. Close gaps for bikes through ranch lands in the park, including closing the Estero Trail loop, connecting Sir Francis Drake Blvd. with Pierce Point Road and connecting Marshall Beach to Pierce Point Road, A more bike-friendly permit application process for road and mountain bike events in the park, including along Bolinas Ridge and out to the lighthouse. Bike access to all ranch roads in the pastoral zone that are already open to pedestrians.

#708

Name: Faber, Phyllis

Correspondence: Dear Superintendent Muldoon, The Point Reyes Seashore was established and the land purchased at public expense because of the ranches that were deemed important to protect back in the 1960s. They have operated as functioning ranches within the Point Reyes seashore ever since. The Indians for generations grazed these lands so that for the most part grasses replaced other plant species making it uniquely good grazing land. Ranchers that settled in the Point Reyes area have continued grazing these lands. The Point Reyes Seashore was established to protect this grazing land as well as the other natural resources, mariculture and fisheries. For unknown reasons the Park administration drove the oyster farm that was located within the Park out of business, destroying the best oyster farm in California waters. A black mark for Park administration. Many Ranch families are historic. Several came from Switzerland or Northern Italy and these families have worked on these Point Reyes land since the 1800s. This has been important in the maintenance and quality of the Pt Reyes grazing lands. Marin County has worked very hard to maintain its agriculture. The 1972 Coastal Act spoke to preserving agricultural lands where possible. In 1980 the Marin Agricultural Land Trust was established to preserve and protect its agricultural lands and has worked hard in the ensuing years to raise the money to purchase their development rights. To date MALT owns the development rights to over half of the privately held ag lands in Marin. When elk were imported to Marin County, it was agreed they would be restricted to the acreage in the north section of the Pt Reyes peninsula and a strong fence was built to limit their range. Over the years the elk reproduced and, as a result of their increased numbers, severely over grazed the land set aside at the Point. Rather than culling them as had been agreed upon at the outset, Park administrators moved several elk to the Limantaur area where there was insufficient and inappropriate vegetation to sustain them. The elk quickly jumped fences and soon invaded different ranches, eating the cattle forage and infecting them with Jonig's disease that the elk were carrying. This has been clear mismanagement of the elk herd that was not envisioned when the elk were brought to Marin Parklands. Ranchers in the Park have made a great effort to work together and to work with Park personnel. There have been disappointments for unknown reasons but they stand ready and willing to continue to do their best to make the Point Reyes Seashore a park of distinction and a critically important part of Marin county agriculture.

#709

Name: Aragon, Roberta

Correspondence: Please consider restricting bicycle access into this beautiful area. Until the biking community is doing a much better job of managing the overload of bicyclists who ride in restricted areas and also continue to pose a physical threat through their dangerous disregard for others on the trails, allowing more access will only increase the problems. Having the right to ride includes also the responsibility to do so in a safe manner. Too many bicyclists behave as if it's their right, but without any responsibility or accountability. I encounter this every day on roads and trails. Safety and balance is the key. Talk is cheap. We need to see successful, actionable efforts and behavior with what areas bicyclists currently are riding in to even begin to discuss opening up more areas.

#710

Name: Leon, Alice

Correspondence: Existing, operational ranches should be converted and transitioned to natural habitat AFTER an owner dies or retires and his/her family does not wish to continue to operate a ranch.

The following alternative action and goal should be assessed by the NPS by adding it to the current, multiple alternative management plan NPS has already created and is considering:

Retire and convert all of the ranches in the short- and long-term to be natural habitat. They would no longer function as operational ranches. This action would ensure the entire Pt. Reyes National Seashore land holdings are consistent with the act that created PRNS and, thus, uphold the National Park Service's mission.

Based on #2, above, successful execution of this option would ensure that PRNS joins other lands throughout the USA as a member of America's natural legacy - and, in so doing, native flora and fauna will thrive, with visitors able to enjoy America's diverse, precious splendor.

Regards, A /

#711

Name: Carey, Chris

Correspondence: Hi,

Yes, please. Allowing bikes to access non-Wilderness land on fireroads creates a wonderful recreational opportunity and expands reasonable access to more families. It has the added benefit of allowing bike riders who feel unsafe on the narrow marin roads a place they can go to get exercise. This expanded use of the non-wilderness habitat will help ensure it is continually enjoyed and protected for years to come.

#712

Name: Murray, John

Correspondence: PLEASE NO BIKE ACCESS TO TRAILS AT POINT REYES! IT INHIBITES HIKING AND IS DANGEROUS. THESE BIKES DONT BELONG ON HIKING TRAILS!!!!!!

#713

Name: Lanier, Warren

Correspondence: Please expand access for mountain bikes in point Reyes national seashore. As it stands it is very hard to put together any sort of experience that is not an out-and-back. Connecting some of the fire road access would make a huge difference and bringing the ever-expanding mountain bike user base into the park. Today's mountain bike community is much different than the community I grew up in; more mature, more courteous, more appreciative of our public lands, and importantly, more conservation oriented. Many projects in and around the Bay area have been successfully spearheaded by the mountain bike community to increase access while maintaining infrastructure and bringing more people to our beautiful lands.

#714

Name: WARREN, SHERRY

Correspondence: TO THE PARKS DEPARTMENT

IT HAS SADDEN ME TO LEARN THAT YOU ARE CONSIDERING ALLOWING BICYCLES ACCESS TO ALL THE TRAILS AT PT. REYES NATIONAL PARK. AS AN EQUESTRIAN IT HAS BEEN THE MOST WONDERFUL PLACE TO RIDE AND FEEL SAFE FROM THE DANGER OF SPEEDING BICYCLES. AS MORE AND MORE OF OUR TRAILS ARE BEING LOST TO BICYCLES IT HAS BECOME HARDER AND HARDER TO FIND TRAILS IN OUR STATE THAT ARE SAFE FOR US AND OUR HORSES.

A BICYCLIST CAN PRETTY MUCH RIDE A BIKE ANY WHERE THEY WANT WITH THE EXCEPTION OF INTERSTATE HIGHWAYS. ALL YOU HAVE TO DO IS LOOK AROUND AS YOU DRIVE ANY WHERE IN CALIFORNIA, THEY DON'T NEED SPECIAL LANES TO RIDE ANY PLACE THEY WANT TO GO FOR THE MOST PART. NOT TRUE FOR EQUESTRIANS WE CAN'T RIDE ALONG BUSY ROADS AND HIGHWAYS AS THEY DO, WE WOULD BE ENDANGERING NOT ONLY OUR LIVES AND OUR HORSES, WE WOULD ALSO ENDANGER THE LIVES OF THE DRIVERS AND THEIR FAMILIES. IT WOULD BE A VERY IRRSPONSIBLE THING TO DO.

THERE ARE ALREADY TRAILS FOR BICYCLES AT PT.REYES, PLEASE DON'T CHANGE WHAT HAS BEEN WORKING FOR YEARS. IF YOU DO PT. REYES WILL CHANGE FOREVER AND THE SAFTY OF OTHER IS AT RISK. SINCERELY SHERRY WARREN

#715

Name: golbus, aaron

Correspondence: A new trail between Devil's Gulch and Platform Bridge through the Cheda, McIsaac, and Zanardi Ranches.

A plan to connect the Cross Marin Trail into Point Reyes.

Adoption of social trails off Bolinas Ridge for better connectivity and a single-track trail experience.

Extend the Olema Valley Trail to Bolinas on the east side of Highway 1.

Close gaps for bikes through ranch lands in the park, including closing the Estero Trail loop, connecting Sir Francis Drake Blvd. with Pierce Point Road, and connecting Marshall Beach to Pierce Point Road,

A more bike-friendly permit application process for road and mountain bike events in the park, including along Bolinas Ridge and out to the lighthouse.

Bike access to all ranch roads in the pastoral zone that are already open to pedestrians.

No horses on skinny trails.

#716

Name: E, S

Correspondence: I am a California native and currently live in the Bay Area. I strongly oppose allowing any ranchers to graze cattle on public lands. This is an outdated model and a giveaway to cattle ranchers, it has no benefit to the public and is a detriment to the wildlife on these lands, especially to the native Tule elk. It is time for the Bay Area to show an enlightened way forward. Now, more than ever, we need to protect natural habitats for wildlife and future generations of the public, and this precludes grazing livestock. It is a no win for the public to continue to give away the public commons to select private interests. Please let California stand for protecting natural habitats and wildlife from private commercial industry. I support alternative F.

#717

Name: Mallonee, Nicholas

Correspondence: I support the proposal that the Marin County Bicycle Coalition has put forward:

A new trail between Devil's Gulch and Platform Bridge through the Cheda, McIsaac, and Zanardi Ranches.

A plan to connect the Cross Marin Trail into Point Reyes.

Adoption of social trails off Bolinas Ridge for better connectivity and a single-track trail experience.

Extend the Olema Valley Trail to Bolinas on the east side of Highway 1.

Close gaps for bikes through ranch lands in the park, including closing the Estero Trail loop, connecting Sir Francis Drake Blvd. with Pierce Point Road, and connecting Marshall Beach to Pierce Point Road,

A more bike-friendly permit application process for road and mountain bike events in the park, including along Bolinas Ridge and out to the lighthouse.

Bike access to all ranch roads in the pastoral zone that are already open to pedestrians.

Making the area more accessible to bikes is an easy step towards making the park accessible to more users, and encouraging users to bike & take transit to the parks, reducing the impacts from driving.

Thank you for your consideration

#718

Name: Evens, Jules

Correspondence: Memorandum Date: 28 November 2018 To: National Park Service Cc: Dianne Feinstein, Kamala Harris, Jared Huffman From: Jules Evens, Principal, ARA RE: Point Reyes National Seashore General Management Plan: 2017-10 GMP Amendment Public Comment I am submitting these comments on the GMP as the author of *The Natural History of the Point Reyes Peninsula* (Point Reyes National Seashore Association 1988 and U.C. Press 2008), co-author of *Birds of the Point Reyes National Seashore: a checklist* (2018), as a long-time resident of Point Reyes Station and Inverness, and as a wildlife biologist who has participated in numerous ecological studies within the Seashore over the last 30 years.

I have reviewed the GMP Amendments and these comments refer directly to those documents. I will limit my comments to PRNS, with which I am most familiar, and leave the comments regarding GGNRA to others.

These comments are informed by the enabling legislation "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" with emphasis on the concept natural.

Of the various alternatives currently under consideration, the three alternatives initially suggested (prior to those required by the settlement agreement) are antithetical to the mission and principles of National Park Service. Especially egregious is the consideration of removal of the Tule elk herd. I am not advocating any of the alternatives required by the settlement agreement, but each is preferable to those earlier alternatives if the goal is protecting and preserving the landscape unimpaired, as it should be. Whichever alternative is ultimately selected the following management practices should be prioritized and implemented by the Parks land managers to protect and preserve the landscape in an ecologically responsible manner.

1. Reduce or reverse impairment of natural resources: Commercial operations that extract resources from public lands, especially parks designated for their natural value and biodiversity, are inconsistent with the National Park Service Organic Act of 1916: purpose and intent 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" [Emphasis added]. Unimpaired is a guiding principle for the Park Service that applies to this GMP. The damage to the soil, the natural vegetation, and the wetlands on grazing lands within the Seashore is readily apparent to Park visitors. I have led many natural history and birding tours on the Peninsula and participants from around the country (and the world) are inevitably appalled by the condition of lands on the Outer Point (especially Ranches A, B, and C) where the landscape is obviously degraded that its natural values have been nearly eliminated. Only strict land management practices that limit the intensive impacts of ungulates can reverse the severe degradation that these lands continue to suffer.
2. Wetland protection: A priority of the NPS should be to reverse degradation and to protect and enhance the natural values of all wetlands within PRNS. The condition of many swales, fens, and marshes has been compromised by trampling, intensive grazing, and excessive nutrient (nitrogenous waste) runoff. Exclusionary fencing of wetlands (and potential wetlands) including 100-meter buffer zones to eliminate impacts by cattle and elk should be a management priority in an attempt to restore the integrity of these valuable resources.
3. Restore natural communities: Degradation of unique natural plant communities is an ongoing problem within the pastoral zone of

the Seashore. Some admirable and effective protections were initiated by the former Superintendent (Don Neubacher), e.g. the exclusion of cattle grazing along most of the uplands on the southeastern flank of upper Abbotts Lagoon to protect *Campanula californica* and the associated swale community. There are many other sites that would benefit from such protective management practices; these should be identified and restored. 4. Prioritize habitat protection for special status species: The Park is to be commended for its efforts to protect the Western Snowy Plover and its attempt to restore coastal dunes. There are other species that could benefit from additional protective measures and focused management practices. A selected list of special status species that could be affected by the GMP is attached. Additionally, we produced a white paper, Tomales Bay Watershed Species of Local interest: Native and Non-native Species of Conservation or Management Concern (Gardali, Kelly, and Evens 2011) that should be consulted when implementing land-management practices. 5. Weed abatement on grazing lands: Grazing pressure has selected for non-native vegetation at the expense of native species. Although there are examples of grazing favoring rare native plants, there are many more examples of extirpation due to grazing pressure and displacement by ecological pest species. (See Appendix 4. Ecological Pest Species in Gardali et al. 2011, op. cit.) 6. Tule Elk preservation: HR 6687, a bill co-sponsored by Rep. Jared Huffman and Rep. Robert Bishop, attempting to grant 20-year leases for ranches in the Seashore and calling for removal of the native Tule Elk. This bill was passed on suspension in the House without any public input and without consideration of an Environmental Impact Statement required by law. Rep. Bishop has been a vigorous opponent of resource conservation and has promoted extractive commercial exploitation of public lands. For Rep. Hoffman, this is a new and disappointing tack. The reintroduction of the native elk to the Seashore has been a successful project, spanning decades, with large contributions of public funds and resources. To reverse that progress because a handful of ranchers complain that elk are interfering with their operations is unacceptable and irresponsible from a resource management perspective. The Parks mission is to preserve natural resources and to protect wildlife, not to kowtow to the wishes and political pressure of commercial interests.

Thank you for considering these comments. 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

Selected Special Status Species potentially impacted by the GMP. Indicates grassland and wetland species potentially impacted by grazing practices.

California freshwater shrimp (*Syncaris pacifica*) San Francisco forktail damselfly (*Ischnura gemina*) Point Reyes blue butterfly (*Plebejus icarioides paraperes*) Myrtle's silverspot butterfly (*Speyeria zerene myrtleae*) Obscure bumble bee (*Bombus caliginosus*) ALL SALMONIDS Tomales roach (*Lavinia symmetricus* ssp. 2) Tidewater goby (*Eucyclogobius newberryi*) California giant salamander (*Dicamptodon ensatus*) California red-legged frog (*Rana draytonii*) Western pond turtle (*Emys marmorata*) Brant (*Branta bernicla*) Ashy storm-petrel (*Oceanodroma homochroa*) Black-crowned Night-Heron (*Nycticorax nycticorax*) Osprey (*Pandion haliaetus*) Northern Harrier (*Circus hudsonius*) Bald Eagle (*Haliaeetus leucocephalus*) Yellow Rail (*Coturnicops noveboracensis*) California Black Rail (*Laterallus jamaicensis coturniculus*) Western Snowy Plover (*Charadrius alexandrinus nivosus*) Tufted Puffin (*Fratercula cirrhata*) Burrowing Owl (*Athene cunicularia*) Northern Spotted Owl (*Strix occidentalis caurina*) Loggerhead Shrike (*Lanius ludovicianus*) California Horned Lark (*Eremophila alpestris actia*) Purple Martin (*Progne subis*) Oak Titmouse (*Baeolophus inornatus*) Grasshopper Sparrow (*Ammodramus savannarum*) Bryant's Savannah Sparrow (*Passerculus sandwichensis alaudinus*) Tricolored Blackbird (*Agelaius tricolor*) Saltmarsh Common Yellowthroat (*Geothlypis trichas sinuosa*) Yellow Warbler (*Setophaga petechia*) All VESPERTILIONIDAE Point Reyes Mountain Beaver (*Aplodontia rufa phaea*) Point Reyes Jumping Mouse (*Zapus trinotatus orarius*) American Badger (*Taxidea taxus*)

#719

Name: Steinfels, Laura

Correspondence: I OPPOSE the Marin County Bicycle Coalition's request to extend the Cross Marin Trail-through Samuel P. Taylor State Park-to Point Reyes Station, and expand mountain and gravel biking access on Pt Reyes National Seashore trails and pastoral ranch roads."

I as an equestrian and hiker value the wilderness and natural quiet trails. It is also important that the visitor experience be maintained for the majority (foot folks), that constantly looking over your shoulder for speeding bikes is not a good experience. The bikers already have 75% - that is enough.

It is our only wilderness land. There are trails that even horses are not allowed on. It needs to be protected.

Thank you, Laura Steinfels

#720

Name: Garcia, Bob

Correspondence: As users managers and stewards of our public lands it is critical that acknowledge the need to preserved the unique nature of individual resources. Point Reyes as rural and mostly non-mechanized resource is re-markedly valuable and unique. Pt. Reyes NS provides an easily accessible escape from the heavily populated SF Bay Area. Hiking and equestrian activities fit well into this environment. I am very concerned that allowing off road bicycles would on the trail system would make it difficult in not impossible for people to enjoy the current Pt Reyes experience that allows a visitor to travel back in time to period when life was centered around an agrarian lifestyle when humanity was more connected to to the land and our ancestral roots. As some point in time we need say no to special interest groups. These groups are focused primarily on entertainment and trills, not the very special environment that surrounds them. Bicycles have no place on the Pt.Reyes trail system

Best regards, Bob Garcia California Native, Former Park Ranger, Hiker, Equestrian and Birder

#721

Name: Novy, Linda

Correspondence: 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 visitors 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

"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

Attachments: Marin Conservation League Agricultural Policy Statement, Marin Conservation League Scoping Comment Letter dated November 13, 2017 _____

Marin Conservation League Agriculture Policy Statement

OVERVIEW

Two hundred and fifty-five families operate Marin Countys 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 rangeland 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 Marins 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 Marins 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 Marins 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 Marins 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.

Marins 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. Marins 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 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. 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 California's 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 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 Extensions 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.^[i]

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 longterm 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 Marins Affirmative Agricultural Easement Program and MALTs 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
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.

Marin Conservation League Scoping Comment Letter dated November 13, 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 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/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

#722

Name: Medeiros, Christine

Correspondence: Don't make the mistake the state made on Mt Tamalpais allowing bikes on paths and fire roads. The damage of not just ruts in mud, widening of trails because they ride on the edges because they create all the ruts. But the worse is when the riders go off trail for a cheap thrill. I see this all the time. When they cut switchbacks and ride down hillsides. The speeds they ride at are dangerous for hiker and horse-riders. Keep bikes off or National Park lands. Pt Reyes is also too remote and spread-out and understaffed to control these bike riders. And then there are the ebikes which are too darn fast and will multiply the negative impact.

#723

Name: Phillips, Julie

Correspondence: After attending the NPS Public Meeting on Wednesday, November 14, 2018 at Point Reyes Station on the General Management Plan Amendment process, I would like to submit additional comments to the letter I submitted (in person) at the meeting on November 14. The Public Meeting and GMP Amendment documents handed out to the general public at the Public Meeting gave more clarity and direction to the proposed options. After reviewing the Alternatives and activities in the planning area for the Environmental Impact Statement (EIS) for a General Management Plan Amendment (GMP Amendment) for Point Reyes National Seashore and the north district of Golden Gate NRA, here are my comments: I support Alternative F: No Ranching and Expansion of Tule Elk in the Planning Area and encourage the National Park Service to implement this approach which is most compatible with the mission of the National Park Service with a focus on native wildlife as the priority, public not-for-profit education facilities and activities, research, outdoor experimental activities, public recreation, trail linkages through native wildlife (including Tule Elk home range), historical interpretation and restoration of the native landscape and native species. Why am I in support of Alternative F: I am writing in support of the free-roaming tule elk herds at Point Reyes National Seashore, and I object to any fencing, removal, sterilization or killing of elk in the park. Tule elk are an important part of the landscape of Point Reyes, and their recovery has been an exciting success story for restoring native species and ecosystems, consistent with the mission of the National Park Service. The National Parks and Seashores are Restricted-Use Lands (the most restricted land use policy) and are the most protected lands on Earth! That is the "mission" taught in public education, colleges and universities as well as by Park leadership, rangers, scientists and docents throughout the United States! Commercial agricultural, cattle and dairy operations on our public lands shouldn't dictate wildlife removal or exclusion policies. Any cattle-ranching operations must be managed to accommodate elk and other native wildlife as a TOP priority, and shouldn't harm habitat for endangered species. This proposed action of allowing farming operations as well as issuing new leases for ranching operations is a DIRECT VIOLATION of the MISSION of the NATIONAL PARK SYSTEM and an existing stipulated agreement. 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 and 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 officials involved in this long process sending to the young people of this country? This proposed expansion of ranching/farming operations and the priority of such land use over native wildlife on federally protected lands clearly sends the message to present and future generations that National Park lands "can be sold" and modified to meet the needs of a few. 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! I also 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. This would create conflicts with predators and degrade wildlife habitat and water quality. What environmental review process was conducted to support such a radical change on public lands? 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 native Tule Elk in PRNS? Has such a process or decision ever been done before within National Park lands in the United States?

The Park Service's amendment to the General Management Plan should prioritize protecting the natural values of Point Reyes National Seashore. This is clearly met in Alternative F. It is time to create a new and sustainable vision for PRNS that is inclusive of all the stakeholders including as #1 the public and native species! 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 /orbs, 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 is 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! The current and proposed cattle and farming operations are incompatible with the mission of these public lands!

As a Tule Elk Biologist who spent many years studying and monitoring the REINTRODUCTION of Tule Elk in the State of California, restoring Tule Elk native populations in PRNS was an integral component of the statewide vision for native free-roaming herds of Tule Elk on public lands! To even consider removing the native elk is irresponsible and clearly a violation of the public good and the vision of those who fought to save the Tule Elk in California!

Tule Elk should clearly be protected and "safe" on public lands especially on NATIONAL PARK LANDS! To do otherwise should require an extensive nationwide discussion and process that is inclusive, public and involves ALL the key stakeholders! In addition, the Tule Elk face a very uncertain future as there have always been significant concerns about the genetic health of this subspecies of North American Elk! Tule Elk went through a significant "population bottleneck" when the statewide numbers were reduced to possibly less than 20 individuals many years ago! So "every" elk is important from a genetic and gene allele perspective!! With the serious concerns about Climate Change, the ability for populations of wildlife to adapt to severe changes in the landscape (and habitat) over a relatively short period of time are a real concern! Every effort should be made to protect "stable" populations of native wildlife (including the Tule Elk, a California endemic Ungulate) especially on PUBLIC LANDS owned by the PUBLIC and held in TRUST for present and future generations!

Be the example you should be National Park System Team and leadership for PRNS! John Muir is considered the "Father" of our National Parks in the United States. What would John Muir think of the current land use practices and degraded landscape at PRNS including the proposed expansion of cattle and farming activities at PRNS, proposed loss of access by the public to significant areas of this park as well as the severe loss of over half of the native Tule Elk due to a lack of access to water and shooting of at least 26 elk by park personnel?

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).

#724

Name: Glossinger, James

Correspondence: Please leave the ranches alone. They add to the character of the Point Reyes area. They are historical, and that historical value is enhanced by the fact that they are still operating. Removing the cattle and turning the ranches into museums will not adequately acknowledge or celebrate the history of ranching in the area as much as allowing the ranching to continue would.

#725

Name: N/A, K

Correspondence: I have been enjoying birding, wildlife watching, botanizing, exploring Pt Reyes Nat'l Seashore for over 30 years. My comments are addressing the possibility of allowing additional access to on- and off-road bicycling throughout the park. Allowing more on- and off-road bicycling in the park would be devastating to sensitive natural vegetation communities and habitats throughout, and increase the risk of danger to themselves and motorists. Having horses is bad enough from a soil erosion and the destruction of natural vegetation (trampling, weed seeds in their dung) standpoint. Adding off-road bicycling would have a negative impact on the

habitat, as well as the serenity of the park. I find that trails that are in use by off-road bicyclist are unsafe and virtually unusable to walkers/hikers, due to their reckless riding. Bicyclists are always littering their riding paths with good wrappers and containers (not just pros on TV, I've seen it for my own eyes with weekend warriors on the streets).

Adding road bicyclists to the already narrow and dangerous roads in the park would be a recipe for disaster. Road bicyclists invariably block traffic ON PURPOSE given the opportunity. They never yield to vehicle traffic (e.g. pull-over into pullouts) thus creating dangerous situations by backing up cars. These roads were not constructed to accommodate bicyclists. They were built for motor vehicle access.

Thank you for the opportunity to comment on this matter.

#726

Name: Gescheidt, Jack

Correspondence: This is outrageous! Marin County ranchers should NOT be allowed to supplant the (relatively) wild tule elk herds on NPS public lands with their domesticated animals-for-profit. Ideally, their leases should NOT be extended, and all NPS lands should be cleared of commercial operations and used ONLY for wild animals. There is so little wild land remaining for wild (or relatively wild) animals and a place for the public to enjoy them from a distance. Allowing these animals to be removed or killed (what ranchers want to call, euphemistically, "culling") to accommodate their for-profit ventures is enraging.

#727

Name: Gerwein, Joel

Correspondence: I enjoy hiking and cycling in Point Reyes National Seashore, but would like to have more cycling access. I would support the following projects/increased access for cyclists:

A new trail between Devil's Gulch and Platform Bridge through the Cheda, McIsaac, and Zanardi Ranches.

A plan to connect the Cross Marin Trail into Point Reyes.

Adoption of social trails off Bolinas Ridge for better connectivity and a single-track trail experience.

Extend the Olema Valley Trail to Bolinas on the east side of Highway 1.

Close gaps for bikes through ranch lands in the park, including closing the Estero Trail loop, connecting Sir Francis Drake Blvd. with Pierce Point Road, and connecting Marshall Beach to Pierce Point Road,

A more bike-friendly permit application process for road and mountain bike events in the park, including along Bolinas Ridge and out to the lighthouse.

Bike access to all ranch roads in the pastoral zone that are already open to pedestrians.

#728

Name: Gandesbery, Thomas

Correspondence: I am writing in support of building new trails and opening up existing trails / roads to bicycles. We need more connectivity and safer routes in Point Reyes National Seashore and surrounding area.

#729

Name: Wallerich, Gretchen

Correspondence: I HAVE LIVED IN MARIN COUNTY FOR 45 YEARS AND COUNT AGREE WITH THE GROUPS TRYING TO PRESERVE RANCHING IN THE PARK MORE! IT IS A STRONG PART OF OUR RURAL CULTURAL HERTIAGE, DIVERSE IDENTITY AND A WELL ESTABLISHED, SUSTAINABLE, PRACTICAL USE OF THE LAND... NOT TO MENTAION A LIVELIHOOD FOR THE MANY PEOPLE WHOSE JOBS ARE TIED TO IT.. THE PARK NEEDS TO WORK WITH THE RANCHERS TO STWEARD AND CONSERVE THE ENVIRONMENT.. THEY ARE A MOTIVATED WORKFORCE THAT WILL SAVE PUBLIC TAX DOLLARS.. WITHOUT GRAZING THE CURRENT RANCH LAND WOULD BE QUICKLY OVERRUN BY CREOSOTE BUSH LIKE THE REST OF THE PARK WAS.. IF WE LOSE RANCHING IN THE PARK THE EXISTENCE OF THE REST OF THE COUNTY'S RANCHES WILL BE IN JEOPARDY AS WELL. THANK YOU FOR YOUR CONSIDERATION ON THIS MATTER

1. With the increased security of a longer lease, the ranchers would be better able to take care of the cultural and natural resources. Because: This allows for planning. It saves NPS time and money with annual compliance meetings between ranchers and PRNS continuing It shows a commitment by the Dept. of Interior that ranching will continue. 2. The park service generally has limited agricultural experience and there is a high rate of turnover with staff responsible for working with the ranches. Ranchers are the only land stewards with institutional knowledge of the resources and are constantly educating new PRNS staff about ranching and dairying. The EIS must evaluate the advantages of creating an Agricultural Advisory Committee. Here's why: Agreements would not be forgotten or overturned Local agricultural expertise could be included in decision making local resource conservation experts would be included in decision making The local community could be included in decision making Individuals with long-term knowledge of the seashore ranches and dairies would be involved. 3. The Park service should encourage operational flexibility for the ranchers - including the implementation of best management practices including brush control, weed control, stocking density, water system improvements, fencing and other practices that have been shown to sequester atmospheric carbon in rangeland soils. This encourages better stewardship Allows quicker decision making the help ranches remain viable It helps the preserve the working landscape It's better for natural resources And importantly now it can help prevent fires!

#730

Name: Moore, Janet

Correspondence: I oppose the extension of agriculture leases and the killing of elk at Point Reyes National Seashore. Please find a better way!

#731

Name: Towers, Rosalie

Correspondence: Please do not kill the elk, please place them somewhere else. Can't they share the grass with the cows?

#732

Name: Thron, Douglas

Correspondence: Please do not kill any of the majestic elk in Pt Reyes. Also remove the cows as soon as possible. Dairy isn't good for people anyway. The abuse to dairy cows isn't remotely morally acceptable either.

#733

Name: Ribe, Tom

Correspondence: I am commenting on the continuation of commercial livestock operations at Point Reyes National Seashore, managed by the National Park Service. I have visited this park many times and have been struck by the presence of cattle and cattle management equipment in a large area of the park that is heavily visited by the public. As I understand the cattle ranchers are using land owned by the people of the United States. In 1978 the ranchers were given a 25 year term for their operations. That term has expired and the NPS has an obligation to decide if ranching is consistent with the Organic Act of the National Park Service and with the purposes of the National Seashore. The NPS is not an organization to support agriculture or to subsidize agriculture. Pt. Reyes is close to a major metropolitan area with millions of people who use the park for relief from the urban setting. It is an international attraction and is thus important to the local economy for the dollars visitors spend locally. The primary purpose of Pt. Reyes is to serve current and future generations of Americans and to protect the natural environment over the long term. I strongly contend that cattle ranching is contrary to the mission of the National Seashore and is contrary to the mission of the National Park Service. I know many people are sentimental about ranching and dairies but these operations are very common outside the park and can continue elsewhere without use of National Park land. Further, the ranching operations pollute the surface and ground water, they destroy native vegetation and spread exotics and I understand a proposal exists to start killing native elk on behalf of the ranchers. Elk should not be killed for any purpose outside protecting the natural environment. I strongly urge the NPS to terminate the ranching operations and have the cattle removed from the park as soon as possible. I know this will cause controversy just as the oyster farming termination did. But it is the right thing to do for the large number of visitors to the park and for the native wildlife and plants that depend on an wild environment rather than one contaminated by cattle.

#734

Name: Berghmans , Federico

Correspondence: The argument on the necessity of raised animals for consumption as a component of the ecosystem is appalling. How about stop destroying the ecosystems for private and economic interests of an industry who doesn't care about animal welfare, human health and environmental protection. Time to stop these crooks destroying the planet for their greed.

#735

Name: Nolan, Fiona

Correspondence: While I have nothing against mountain bikers, I see the damage mountain bikers do to trails and then some bikers get bored and go off trail and do even more damage. Now more than ever I believe our environment/ wildlife needs extra protection. Please leave well enough alone and protect Pt. Reyes. Thank you!!

#736

Name: Garcia, Laura

Correspondence: I am writing to voice my objection to the GMP Amendment which would allow the continuation of cattle grazing. I especially oppose the allowance of the "lethal" means to eradicate the Tule Elk. Cattle grazing is a part of a commercial enterprise and should not be allowed to take precedence of the protection of wildlife- especially the elk. I urge the Point Reyes National Seashore be protected and that the Park Service not allow "for profit" enterprise to disrupt the natural beauty of our public lands. Protect the wild life!!

#737

Name: Hermian, Wendy

Correspondence: I would like to state that I oppose any plans to remove the herd of tule elk from this area. I regard them an essential part of the ecosystem, of greater importance than the cows present here, and support land management practices which include the elk. Tule elk attract tourism revenue for the land, unlike the cows, and increase local biodiversity and ecosystem services.

#738

Name: Owseicmik, Arlene

Correspondence: Important? Equally important? Please consider the majesty of the wild animals in making your decision about how to proceed. Dear Amendment Folks, I love Pt. Reyes as much as any other place on this earth. An incredibly special place right here in our backyards. I have been thrilled with the story of the tule elk and I love being in their company. Thank you for giving them an opportunity to thrive and delight. I also love the farms! They are so rugged and windswept. I consume clover organic products Isn't there a way to compromise Can't both resources be considered

#739

Name: Gluck, Sandra

Correspondence: I am a resident of Marin County, California, and I consider the Point Reyes National Seashore to be a genuine treasure not only for the people who live here, but for the many Americans who visit each year. I strongly oppose culling the tulle elk herd either by killing these majestic wild animals or by relocating them - which often leads to their death as well. The purpose of national park land is to allow animals and people to enjoy the natural habitats. Ranches and dairies should not be allowed to overtake the natural lands and push out the wild animals that are native to that land. They also should not be allowed to pollute the water with the huge quantities of animal waste. The park should be a national park - and the leases for private ranches and dairies should not be extended. Thank you.

#740

Name: Toner, Sheila

Correspondence: Please do not allow bikes on trails in Pt Reyes.

They make the trails dangerous for hikers and equestrians and also often tear up the trails.

Unfortunately I live in Auburn, where many supposed multi use trails are now too dangerous for riders or hikers. As a hiker I have literally had bikers run into me, since they were going so fast they could not stop before hitting me. We have had a number of injured horses who were spooked by speeding bikers.

Please, please keep Pt Reyes a nice, safe place to be able to enjoy the walks and the scenery without fear of being run over or yelled at to get off the trails since bikers (often in large groups) want to pass - despite any rules of the road. I have also been forced by bikers to step off into poison oak - choice being step off into poison oak or get hit by biker who would not slow down to wait for me to find a good place to get off trail.

Trails at Point Reyes are not wide enough to allow speeding bikes and walkers and horseback riders to safely co-exist.

Do not change current rules.

Thank you.

#741

Name: Simonson, Michelle

Correspondence: Please do not kill the Elk!

#742

Name: Brux, Mark

Correspondence: Please consider and incorporate the following in your Pt. Reyes National Seashore planning, thank you:

- 1.) A new trail between Devil's Gulch and Platform Bridge through Cheda, McIsaac and Zanardi Ranch.
- 2.) A plan to connect the Cross Marin Trail into Point Reyes.
- 3.) Adoption of social trails off Bolinas Ridge for better connectivity and a single-track trail experience.
- 4.) Extend the Olema Valley Trail to Bolinas on the east side of Highway 1.
- 5.) Close gaps for bikes through ranch lands in the park, including closing the Estero Trail loop, connecting Sir Francis Drake Blvd. with Pierce Point Road and connecting Marshall Beach to Pierce Point Road.
- 6.) A more bike-friendly permit application process for road and mountain bike events in the park, including along Bolinas Ridge and out to the lighthouse.
- 7.) Bike access to all ranch roads in the pastoral zone that are already open to pedestrians.

#743

Name: Schubert, Mateo

Correspondence: Mountain bikers in the general bay area are limited to very few legal trails which leads to illegal trail riding. The least that parks could do is to let mountain bikers make some trails that are just right for them. Or open trails that have been previously closed off to mountain bikers and create a schedule that alternates days between different trails users every week or month.

#744

Name: Hudson, K.

Correspondence: As a taxpayer and avid equestrian, who has enjoyed horseback riding at Pt. Reyes for nearly 30 years, I urge you to keep Pt. Reyes closed to mountain bike riders for the safety of my fellow equestrians and hikers alike. Too many of the trails are narrow with blind curves, and not conducive for a shared use trail with mountain bike riders that travel at speeds that just invite a "wreck" with an unsuspecting horse or hiker. The places that equestrians can safely ride are getting fewer and farther between, and it feels like soon we will have nowhere left to go. Bikers already have the luxury of riding on roads, and just about anywhere they please. I beg you please, don't squeeze us out!

#745

Name: Rosen, Margaret

Correspondence: I would love to see a visionary "master trail plan" for the development of a long-term, coordinated trail system within the planning area and PORE, to link the extensive southern trails with the trails in the northern section of the planning area. The National Park Service (NPS) GMP Amendment EIS scoping materials state that "The NPS would strive to improve hiking, biking, and equestrian access to the planning area."

I am in strong support of this effort and advocate that the scope of the EIS fully embrace and account for the creation of a master trail plan for PORE connecting the north and south sections. It is critical that the NPS embrace a long-term visionary approach to trail planning as part of the GMP Amendment because all of the critical points of trail connectivity fall within the planning area.

A plan can allow for opportunistic implementation over the longer term (5-50 years) as needed resources become available. A plan does NOT necessitate immediate additional trails nor funds for their creation or maintenance and the underfunding of trail maintenance should not be a reason to avoid creating an inspirational trail vision at PORE for the future.

Having a long-term visionary master trail plan can be a rallying point for a group of volunteers to either work to advocate for, maintain and financially support the trail system. I was recently hiking part of the Appalachian trail. There is a long and strong network of support for that system- -I believe that could become the case here too (especially if there were more camping places or tent cabins available to support people coming for several days at a time without having to stay in a high-priced B&B.

thank you for your consideration!

#746

Name: Messer, Steve

Correspondence: On behalf of the Concerned Off-Road Bicyclists Association (CORBA), and our members and constituents, we submit these comments in support of, and agreement with, the comments made by the Marin County Bicycle Coalition. Specifically, we support:

A new trail between Devil's Gulch and Platform Bridge through the Cheda, McIsaac, and Zanardi Ranches.

A plan to connect the Cross Marin Trail into Point Reyes.

Adoption of social trails off Bolinas Ridge for better connectivity and a single-track trail experience.

Extend the Olema Valley Trail to Bolinas on the east side of Highway 1.

Close gaps for bikes through ranch lands in the park, including closing the Estero Trail loop, connecting Sir Francis Drake Blvd. with Pierce Point Road, and connecting Marshall Beach to Pierce Point Road,

A more bike-friendly permit application process for road and mountain bike events in the park, including along Bolinas Ridge and out to the lighthouse.

Bike access to all ranch roads in the pastoral zone that are already open to pedestrians.

We have seen an explosion in the popularity of mountain bike as an active, healthy, and environmentally friendly form of passive outdoor recreation. This phenomenal growth has been fueled in part by the growth of youth cycling, social media, and the fact that riding a bike is a fun way to get exercise and connect with our public lands. As this form of recreation continues to grow, we are seeing more and more people using trails. Trails are getting more and more crowded. The only solution to this is to increase opportunities for mountain biking recreation. Point Reyes has the potential to provide additional opportunities for better trail experiences.

For our local federal lands in Southern California, the mountain biking community has played an immense and increasing role in the maintenance of trails, restoration of fire- and flood-damaged trails, and peer-based trail etiquette education. The mountain biking community is playing a major role in trail maintenance nationwide as the sport grows and has become an economic driver for many areas.

The fact that social trails exist off Bolinas ridge and other places, and continue to proliferate is a clear indication of unmet public demand for trail-based recreation. Many of the existing social trails could be adopted as official system trails, with modifications to improve sustainability.

We urge the NPS to work with the mountain biking community, and other trail user groups to ensure that there are ample opportunities to connect to our public lands at Point Reyes in the ways they most enjoy.

#747

Name: St. John, Kathryn

Correspondence: The MCBC (Marin County Bicycle Coalition) is trying to gain access to the wilderness trails in Pt Reyes National Seashore. They already have access to over 75% of Marin's trails and that is more than enough for them to enjoy. Protecting Pt Reyes is critical. It is our only wilderness land. There are trails that even horses are not allowed on and even though I'm an equestrian I think that is for the best. The wilderness needs to be protected!

I am against the expansion of bike trails at Point Reyes due to corrosion of trails and ruts that the bikes make, safety and to preserve the trails as horse friendly. The horse trails are among the most beautiful in all of California and are highly valued by equestrians both in California and outside our state.

Thank you for your consideration.

Kathy St. John Equestrian

#748

Name: Eichhorn, Donna

Correspondence: Parks are for the enjoyment of nature and wildlife. Roaming herds of cows do more damage to the environment than the elk. I understand if the elk herd gets out of balance sometimes culling is necessary but not because of commercial endeavors such as the dairy industry. There must be a better solution than culling at this time. I love to see the elk when I am at the national seashore.

#749

Name: N/A, N/A

Correspondence: A new trail between Devil's Gulch and Platform Bridge through Cheda, McIsaac and Zanardi Ranch. A plan to connect the Cross Marin Trail into Point Reyes. Adoption of social trails off Bolinas Ridge for better connectivity and a single-track trail experience. Extend the Olema Valley Trail to Bolinas on the east side of Highway 1. Close gaps for bikes through ranch lands in the park, including closing the Estero Trail loop, connecting Sir Francis Drake Blvd. with Pierce Point Road and connecting Marshall Beach to Pierce Point Road, A more bike-friendly permit application process for road and mountain bike events in the park, including along Bolinas Ridge and out to the lighthouse. Bike access to all ranch roads in the pastoral zone that are already open to pedestrians.

#750

Name: Strayer, Pam

Correspondence: The public taxpayers paid for a park, and the rules on ranching were clear. Clear out after the allotted time period. It is scandalous that we have to fight for the public's right to have tule elk not cattle grazing on these public lands. Please tell the ranchers time's up. There are plenty of ranches for sale where they can move their cattle. Free ride on public lands should be over. Transitioning them off this land was the intention. That is why WE the taxpayer bought the land - to have a park with wildlife. Now's the time to enforce that.

#751

Name: Wuerthner, George

Correspondence: A few more items.

You should review the impacts of domestic livestock on Tule elk- -ie. social displacement. A number of studies have documented that elk avoid feeding in areas actively being grazed by domestic livestock.

Frisina 1992 Elk Habitat Use within a Rest-Rotation Grazing System and Elk habitat selection, distribution, and nutrition as influenced by cattle in east-central Idaho Sandra Prater Kratville The University of Montana

There are others, but these both document social displacement.

A second point should be the impacts on various ecological features. Two good references are

Ecological Effects of Ranching: A Six-Point Critique Article in BioScience · January 2009 DOI: 10.1641/0006-3568(2003)053[0759:EEORAS]2.0.CO;2

Ecological Costs of Livestock Grazing in Western North America Thomas L. Fleischner Conservation Biology, Vol. 8, No. 3. (Sep., 1994), pp. 629-644. Stable

A third issue is impacts on native ungulates from disease transmissions. Various diseases from brucellosis to CWD and others have been traced to livestock.

Here's a good overview <http://wildlife.org/from-wildlife-to-livestock-and-vice-versa/>

#752

Name: Weihe, Orion

Correspondence: As a mtn biking enthusiast and a past long-time Bay Area resident, I'm writing to voice strong support for increased mtn bike access in Pt. Reyes. Specifically, I support the below actions as suggested by the MCBC.

A new trail between Devil's Gulch and Platform Bridge through the Cheda, McIsaac, and Zanardi Ranches.

A plan to connect the Cross Marin Trail into Point Reyes.

Adoption of social trails off Bolinas Ridge for better connectivity and a single-track trail experience.

Extend the Olema Valley Trail to Bolinas on the east side of Highway 1.

Close gaps for bikes through ranch lands in the park, including closing the Estero Trail loop, connecting Sir Francis Drake Blvd. with Pierce Point Road, and connecting Marshall Beach to Pierce Point Road,

A more bike-friendly permit application process for road and mountain bike events in the park, including along Bolinas Ridge and out to the lighthouse.

Bike access to all ranch roads in the pastoral zone that are already open to pedestrians.

Thank you.

#753

Name: Reid, Cornelia

Correspondence: The park service should issue 20 year rolling leases to the ranchers - every year the 20-year lease automatically renews. This gives the ranchers and the public 20 years notice if ranching is to be discontinued at PRNS. This agreement would be similar to the Williamson Act agreements. Keep annual compliance meetings between ranchers and PRNS, and keep the NPS 30 day cancellation clause for non-compliance to protect the NPS and public. Advantages of the 20-year rolling leases include:

#754

Name: N/A, N/A

Correspondence: Thank you for the opportunity to respond. As a life long resident of Marin County and frequent wilderness enthusiast, I hereby request strongly, that no additional trail access be granted to bicycles particularly in Pt. Reyes National Seashore and surrounding areas such as: Samuel P Taylor Park; Cross Marin Trail; Olema Valley Trail to Bolinas; Devils Gulch to Platform Bridge Rd; Bolinas Ridge; Estero Trail; Pierce Point Rd; Marshall Beach; and especially any ranch roads. Bicycles are vehicles and not compatible with wilderness areas. In fact bicycles negatively impact wilderness areas through soil erosion, vegetation damage and wildlife and livestock disturbance. Marin's natural beauty should be appreciated and cherished more gently such as by foot people. There are currently plenty of areas in the local park system that are available to bicycles. Please do not grant any additional access to bicycles on park land in Marin County. Thank you for representing me.

#755

Name: N/A, N/A

Correspondence: Cows destroy wildlife habitat, trample sensitive areas leading to erosion, and spread diseases such as giardia and cryptosporidium. When i visit Point Reyes, i don't like seeing these half-ton, non-native animals trampling the landscape. Please acknowledge and disclose the many adverse effects of cattle, and get them out of Point Reyes, once and for all. Thank you for considering my views.

#756

Name: Hock, Marie

Correspondence: Please withhold my comments from public view.

I am not in favor of extending the ranch leases if it is discretionary. This is public land and is for public benefit. The ranchers do not benefit the public, the wildlife or the park experience in a significant way. I would prefer that the land be used as park land and not to raise animals for people to eat.

#757

Name: Morse, AV

Correspondence: As an avid hiker and horse rider, the peaceful quietness of the trails in Pt Reyes National Seashore will NOT benefit from wheels rolling through the park. There are many trails in the Water District and on Mt Tam, where I no longer ride my horse or go hiking, because the speed attained by mountain bicyclists is not safe.

I have been physically pushed off the 680 trail by a speeding bicyclist while hiking and my (well-trained) horse has spooked when a bicyclist suddenly came up from behind, on a downhill section on a Water District trail.

Pt Reyes National Seashore has over 2 million visitors a year. The thought of thousands of bicyclists from near and far using the trails is the antithesis of a tranquil, serene and restorative visit that we experience when we spend time in the Park.

Please keep the Park a quiet and contemplative place to encounter nature.

Thank you for the opportunity to express my deep concerns.

#758

Name: Meyer, Amy

Correspondence: Point Reyes GMPA

I support Alternative B, the NPS Preferred Alternative and all the elements of that alternative. None of the other alternatives for management would protect all of the aspects of Point Reyes National Seashore and the northern portion of GGNRA or make evident why they are part of the national park system. I want management of PORE to become more effective. I believe PORE is understaffed to do all that management should accomplish. I hope this GMPA process will lead to examination of the best ways to improve management, by using present staff, working for the addition of necessary staff, and making the best use of public (PRNSA and other) supplementary funding and collaboration.

The Organic Act of 1916 emphasized protection and enjoyment of the natural, scenic and historic values of our national parks. The NPS has broadened its view during the past century-- the NPS has increasingly come to appreciate the more intangible aspects of its parks. Visitors should understand the diversity of habitat and wildlife that they are seeing as they hike, birdwatch, and take photographs. They should also become aware of PORE's human and cultural dimensions. This requires robust interpretive programs of the park lands. Their improvement would contribute significantly to future public use, understanding and enjoyment. That includes: * Proactive care of the natural and cultural landscape * Best Management Practices to care for these landscapes * Conservation of historic districts and structures

The two parks culture and history were built upon their natural landscape. It is not only necessary to conserve and interpret that glorious landscape but to increase public understanding of why and how certain habitat and wild species, including the tule elk, have come to be here.

As noted in preparatory information for commenting on this GMPA scoping, the two Dairy Districts have recently been declared historic. A museum of closed dairy ranches cannot substitute for the activities of ranching that convey the intangible aspects of the cultural life of this park!

Preservation of the cultural landscape needs to include interpretation of the history of Point Reyes before it was a park and how it became a park because of dynamic, effective citizen advocacy. The park needs:

* Better interpretation of national park advocacy and politics * Improvement of visitor use, experience, and access

Informative and sufficient signage, not present now, would help. But park visitors should also have the opportunity to enjoy a series of vivid experiences. The ranches, several more than 150 years old, can best tell their own stories in various ways, somewhat different for each ranch, with the assistance of trained docents. What is interpreted at a living site could be supplemented with oral histories and exhibits in the visitor center. The opportunity to stay on a ranch as part of an educational program should also be considered.

I have been to very informative programs given by PORE staff. I hope that PRNSA will be encouraged to develop a cadre of trained docents who can also lead hikes and give programs related to park resources. The personal love for this park that is so well expressed by staff and park advocates needs more people trained to share their joy with park visitors. Ranches and ranching— including, where possible, showing off aspects of model ranching— should be used as park educational resources. Ranchers should be brought into this process to help decide what would give the best educational results.

At this time there is an extensive trail system that needs connection and signage. Improving park trails should be a major goal of the GMPA. However, it is also important for ranchers who live in the Seashore to have the security of a clearly restricted core area for their personal needs. Those delineations are not always clear today. It is also important that ranchers not sign or fence public areas as if they were closed. Again, ranchers should have the opportunity to make recommendations and work collaboratively with PORE staff.

Consideration should be given to other sorts of visitor experiences that may be appropriate on the ranches. I believe these activities should be chosen to lead to greater visitor understanding.

Such commercial activities as farm stands and bed-and-breakfast lodging unrelated to the park experience are not appropriate. The best economic assistance that can be offered the ranchers is the security of 20 year leases.

A matter not yet much explored is the succession of family management of these ranches. The park is now over 55 years old. The ranching families are part of a community—and they do change. This intangible human element needs examination and potential restructuring to take ranching into the next 55 years.

* The park also needs comprehensive management of its tule elk

Tule elk are not an endangered species. They have been multiplying prodigiously in the park in the absence of predators. There is no possibility of bringing predators back to the park that would help control the elk population. Other national parks have also had to manage ungulate populations and may have lessons that would benefit elk management here. They include:

Bison in Yellowstone National Park are managed under the umbrella of the Interagency Bison Management Plan. Problems at Yellowstone include overpopulation and brucellosis.

Management of white-tailed deer was approved by the NPS in the 2012 Rock Creek Park Deer Management Plan. An overabundance of deer caused detrimental changes in the species composition, structure, abundance, and distribution of native plant communities and was impeding natural forest regeneration. Deer were reduced to acceptable densities through agency-led culling efforts and their meat was donated.

In 2010, Theodore Roosevelt National Park approved an Elk Management Plan EIS in order to address overpopulation issues. One approved method for elk management was culling, using NPS trained and supervised public volunteers selected through a lottery system.

This difficult issue requires the understanding and support of everyone who cares about the future of this species in the Seashore. Structured specific alternatives should be the subject of public comment and hearings.

#759

Name: N/A, N/A

Correspondence: I am writing to oppose letting mountain bikers have access to Pt. Reyes wilderness lands as bikes do too much damage to the land and bikers don't play by the rules. They go wherever they want without a care for the damage they do to the very natural habitat they seem to so desperate to be in. Please do not allow this.

#760

Name: Dixon-Johnson, Diane

Correspondence: I have served on the Mounted Patrol, for nearly 20 years, just retiring last month. In that time, I advocated and spoke for trail safety in meetings and support groups from the LA area, the Bay area, Grass Valley and beyond. I've met with State legislators (Boxer, McClintock reps), the Parks chair in Sacramento (Anthony Jackson - now retired), the Pacific Crest Trail president (Liz Bergeron) and various other heads of forestry and parks personnel ... all in promoting trail safety and usage.

I am also a multi-sport athlete- completing the 100 mile Tevis Cup horse ride, the Western States 100 mile run and a multitude of 100 mile/km bike rides and several triathlons. I'm active in all disciplines. The trail, however, is not a place for everyone all the time. In order to be a multi-use trail, there must be a plan in place and it be specifically designed and built for that usage with width, height, line of sight and common sense in mind.

Many of the trails have existed for decades, even 100 years as in our Mother Lode area, are single track, traverse along precipitous ridges, ramble through sacred/cultural sites, include switchbacks and are designed for foot traffic. Mountain biking is a relatively new sport compared to the horse, the runner, the birder, the hiker etc. These cyclists create a circuitous path on these already narrow trails leading to deep troughs, erosion and extra trail maintenance. They often find thrills in speed, jumps, night riding and banking turns, deterring from the serenity and safety of the other users.

I compiled a notebook in 3 months to take to meetings that included news articles of accidents, paralysis, ambulance rides, terror, fear and even death on the trails with encounters with mt. bikes. Within designated areas, this sport is fine and should be allowed with liked minded users. I've tried to advocated for OHV trails to open to the mt. bikes, but to no avail. The mt. bikes say it's too dangerous ... the shoe has apparently changed feet.

I hope the National Parks Service considers this issue very seriously before considering allowing these bikes unlimited access to these trails and that you understand that the mt. bike community has big money and lobbyists employed specifically to push these agendas through. Thank you for reaching out to others...

#761

Name: Driggers, Joyce

Correspondence: I have been horse camping and riding the trails at Pt. Reyes for 30 years. These beautiful trails need to be kept for hiking and equestrian use and not for bicycle use. Bicyclists already have use of the vast majority of trails in the Marin area. Please keep these trails free from bicycles so that equestrians and hikers can continue to have trails to use without the fear of running into bicycles.

There is a real safety issue with bicycles on these trails. Too many cyclists ride too fast and without regard for other trail users. These trails are often narrow with a steep drop off. The meeting of a horseback rider with a bicyclist on such trails has the potential for a disastrous, if not deadly outcome. Hikers, also are at risk on such trails when bicyclist are present. There have already been incidents on Stewarts Trail where bicycles are allowed.

Personally, I try to be good about sharing trails with bicyclist and other trail users, where the trails are safe for multi-use. I don't think that is the case with the majority of these trail.

Thank you for your consideration.

#762

Name: Wood, Thomas

Correspondence: The continuation of ranching on Point Reyes has both a historical and an environmental justification; historically, because they antedated the creation of the National Seashore and because the ranchers were instrumental in their cooperation and agreement in the original and intended vision of the Park itself -- without the ranchers, the Park would not have been created; and environmentally, because the very heart and soul of the Park is the ranches and their ranchers, whose collective stewardship of the land is key to sustaining a diverse and rich ecosystem for the benefit of visitors to the Park and to the wider population. What makes a living, thriving National Park? To eliminate the ranches in pursuit of a fanciful return to "wilderness" would simply cave to some groups (extreme environmentalists) at the expense of others (ranchers, workers, and appreciators of the ranches, which, I think, most visitors are) to impose a theme-park idea of "nature" that pretends that human presence and impact does not exist. I say that the majority of the visitors to the Park enjoy the existence of the ranches and also the tule elk. There are solutions, but they take some effort. Though I am a champion of the

natural landscape, I do not subscribe to an all-or-none extremist view of what the Park should be, but rather I find beauty and moral righteousness in the continuing existence of the ranches as an historic and integral part of the Park. Not only are the ranch houses, barns, fences, and animals interesting and beautiful to look at, but the knowledge that they are substantially contributing to the agricultural health and wealth of our community provides added pleasure. Good governance allows for variation and adaptation. What is right for Point Reyes is unique to this specific park. I think it is much harder to preserve and protect an evolving system in which recreation, agriculture, and honest productivity exist side by side than it is to strip everything away for a false ideal.

#763

Name: O'Shea, Jay

Correspondence: As a California resident and frequent visitor to northern California, I urge you to discontinue ranching at Point Reyes. I oppose allowing ranchers to graze cattle on private land, generally, and am particularly concerned about them doing so in a region where such activities impose upon the native Tule Elk herds. Ranching serves no benefit to the public; allowing ranching on public lands is simply a giveaway to cattle ranchers. In a time of climate crisis, we need to regenerate our ecosystems and allow rural areas to revert to a natural state. At a time of economic precarity, California can and should protect the rights of the public from private interest. Let California prioritize the environment over the interests of private commercial industry.

#764

Name: Loy, Gareth

Correspondence: I understand that MCBC (Marin County Bicycle Coalition) supporters are trying to flood the National Park Service with public comments before the Planning, Environment and Public Comment period closes on November 30th in order to force access to the wilderness trails in Pt Reyes that are currently closed to them.

Bikers already have access to over 75% of Marin's trails which I think is more than enough. As a lifelong hiker in Marin, I can attest that even courteous, thoughtful bike riders are a disturbance to Nature; and there are many other bicyclists who are neither courteous nor thoughtful. Bicycles are a clattering disturbance to the peace and quiet that Nature needs to thrive. Pt Reyes is our only wilderness land left in Marin. There are trails that even horses are not allowed on. This land needs to be protected, not exploited.

#765

Name: S., Gina

Correspondence: I am writing to ask that you kindly reconsider the killing of the tulle elk at Point Reyes. I will be disappointed if this goes through. Thank you for your consideration. Best, Gina

#766

Name: N/A, N/A

Correspondence: I wish to comment on public use of point Reyes, in particular Tomales point.

I support opening of additional areas at point Reyes for the tulle elk. I have been hiking at point Reyes (especially tomales point) for 30 years. Until the last couple of years, it was well used and there were plenty of visitors but it was not crowded to the point where it was not enjoyable. If you went on a rainy day it was very quiet with wildlife out. But, I have stopped going to tomalese point because it has become overrun and unpleasant.

There are buses full of tourists from other countries who appear mainly interested in viewing elk. Last time we went there were rangers posted to keep tourists from harassing the elk. Visitors should be able to view the elk at a location somewhere closer to the main road, if that is their interest, even if that somewhere is currently a ranch.

Cattle should ideally relocate outside the park. I don't have any inherent objection to cattle ranches, but ranches are not the best use of this land. Pt Reyes, and in particular Tomales Point, is so beautiful and special and yet many areas are inaccessible because of the ranches. When there were not bus loads of visitors both uses could be accommodated. But with increasing numbers of visitors the park will be ruined unless additional areas can open up so that pressure to visit the more remote areas can be reduced. If the ranches must stay I believe they should raise elk instead of cows for commercial purposes and public access to scenic areas through ranches provided.

In addition part of the experience is the rustic road to the point. I don't wish for it to be widened to accommodate buses. By bringing the elk closer to the main road costly and damaging widening of the road could be avoided and rangers could hopefully monitor and prevent visitors from harassing the elk more easily.

The other problem is the increase in horse treks out to the point. Between the hordes of visitors and the horses the trail has become a dusty, eroded, horse poop filled mess. It is not just a bad experience but is a disgusting experience to hike to the point. If horses are to remain either a different trail needs to be developed or the operators need to collect and remove the poop.

#767

Name: Prasad, Kamal

Correspondence: I'm writing to encourage the Park service to stop all ranching and agricultural practices in Point Reyes National Park and select Alternative F of the Point Reyes National Seashore General Management Plan Amendment.

#768

Name: Cornforth, Janell

Correspondence: As an equestrian and former resident of Marin County I am concerned that giving more bike access to areas in Pt. Reyes National Seashore is very problematic and in some cases dangerous. Riders and hikers should be allowed wilderness experiences without dodging fast moving objects other than creatures that live there, I admit after riding Pt. Reyes for close to twenty years I have only run into a few very bad behaved cyclist. However, one time riding down Greenpicker, my husband and I, had a very aggressive biker trailing us. He was upset because we didn't move over. It was hard for us to move over because it is a single track trail and furthermore he wasn't supposed to be on it anyway! Luckily we were on seasoned trail horses or there could have been a serious accident. Many riders in the park would not have fared that well. Even after all the well behaved and pleasant cyclist we have met on the trails in Pt. Reyes, that one bad apple makes me oppose allowing more bike access. I understand that the cyclist wants to extend the Cross Marin Trail into Pt. Reyes. I do not oppose that idea. It is already a multi purpose trail and it would be nice for users to extend their walk/ride into town.

#769

Name: N/A, N/A

Correspondence: I am a Bay Area resident and I strongly oppose allowing ranchers to graze cattle on our public lands. This is an outdated model and a giveaway to cattle ranchers, it has no benefit to the public and is a detriment to the wildlife on these lands. It is time for the Bay Area to show an enlightened way forward. Now, more than ever, we need to regenerate our ecosystems and protect wildlife habitats, and this precludes grazing livestock. It is a no win for the public to continue to give away the public commons to select private interests. Please let California stand for prioritizing the environment over private commercial industry

#770

Name: Rubin, Elizabeth

Correspondence: I am opposed to allowing expanded access to bikes at Point Reyes National seashore. As an equestrian with years of trail experience I have seen the damage to trails and the danger posed to both hikers and equestrians. They frequently create illegal trails that damage wildlife habitats. Many bikers ride head down with earbuds in their ears and I have been involved in two collisions at Anadell park. Please preserve this amazing park for hikers and equestrians.

#771

Name: Layne, Corky

Correspondence: I have been riding the trails in Pt Reyes for over 30 years. They are so beautiful and serene that it is a calming, pleasurable and unforgettable experience. One can take young children and horses there without worrying about a bicycle ripping around the next curve in the trail frightening or endangering them.

The bicyclists are attempting to take over as many trails as they can, but the trails at Pt Reyes are unique and should be protected from those who value speed more than anything else. Please let us continue to enjoy the one-track trails, as we historically have for so many years, without bicyclists endangering people or horses.

Bicyclists have many trails available to them and horse people have very few. Please let us continue to enjoy staying at Stewart's Horse Camp and hitting the trails from there.

Thank you for giving us a little piece of heaven!

Corky Layne

#772

Name: Oliver, Adam

Correspondence: Although I no longer live in California, I would like to return with my mountain bike someday. Please consider the advise of MCBC to help improve bike access and promote recreation. This will also promote stewardship of the land and a growing relationship with a well organized group like MCBC.

#773

Name: Udkow, Michael

Correspondence: A new trail between Devil's Gulch and Platform Bridge through Cheda, McIsaac and Zanardi Ranch. A plan to connect the Cross Marin Trail into Point Reyes. Adoption of social trails off Bolinas Ridge for better connectivity and a single-track trail experience. Extend the Olema Valley Trail to Bolinas on the east side of Highway 1. Close gaps for bikes through ranch lands in the park, including closing the Estero Trail loop, connecting Sir Francis Drake Blvd. with Pierce Point Road and connecting Marshall Beach to Pierce Point Road, A more bike-friendly permit application process for road and mountain bike events in the park, including along Bolinas Ridge and out to the lighthouse. Bike access to all ranch roads in the pastoral zone that are already open to pedestrians.

#774

Name: Wyman, Lynn

Correspondence: I have been a hiker and equestrian at Pt. Reyes since 1991. I enjoy the peaceful beauty of this National Seashore. Hikers and equestrians share many trails with courtesy for one another. The hikers and equestrians have little impact on the tread of the trails. Mountain bikes cause rutting and erosion on trails. These impacts can be seen at Annandale State Park. The trails there have been significantly impacted by mountain bike traffic. The tranquility of Pt. Reyes would be disrupted by mountain bikes speeding along the trails. Please keep

the current policies of restricting mountain bikes and preserve the trails for hikers and equestrians. Once the soil is skidded off the trails by mountain bikes it cannot be restored. Thank you. Sincerely, Lynn Wyman

#775

Name: Lamarre, Judith

Correspondence: I am a Bay Area resident and strongly oppose allowing ranchers to graze cattle on our public lands. This use of the land has no benefit to the public and has led to soil erosion, water pollution and declines in fish and wildlife.. Please conserve and save the precious and beautiful Point Reyes National Seashore by stopping the cattle ranches from becoming permanent!

#776

Name: Lewis, Matthew

Correspondence: November 28, 2018

Dear, National Park and GGNRA:

Opening the Pt. Reyes National Seashore to Marin Bicycle Coalition would be a disaster! (Re: IJ article, "Increased bicycle access sought," Nov. 28, 2018)

Opening the National Seashore and the GGNRA to the Marin Bicycle Coalition and riders would be like hiring Dracula to babysit your kids - They will suck the blood out of you.

The National Seashore and the Golden Gate National Recreation Area (GGNRA) already don't have the Funds, facilities and staffing to handle the daily overcrowding and trashing of our public lands as exemplified by the deteriorating conditions at the Palo-Marin "parking lot," entrance in Bolinas and the public trashing of the adjacent lakes and trails. To allow the Marin Bicycle Coalition and its riders access to these public lands will only add to these problems.

Simply: The Marin County Bicycle Coalition (MCBC) cannot be trusted.

Since when has the MCBC and its riders ever responded to the many complaints that they receive each year for their blatant disregard for the rules of the road, and the negative impact that they, and their events, have/are having on the communities, drivers, roads and the trails that they already have access too? In other words, when have they ever done what they said that they were going to do?

The MCBC doesn't care about impact. It doesn't care about the rules. It only cares about its riders doing whatever they want to do. Don't be taken in by them saying that they will limit, abide or contain themselves to the non-wilderness, ranch roads, for they have an aversion to "limits." Just take a look at their Marin Century event/race.

I am asking the Pt. Reyes National Seashore and the GGNRA to, first, provide the facilities and staffing necessary to gain control of the existing and overwhelming issues of parking, trashing of the park, enforcement, and the reduction of fire-fuels, and require the MCBC and its members to learn how to contain themselves and abide by the rules, before they allow access to the parks.

Q: Who will benefit if bicyclists are allowed in the parks?

A: Certainly not the parks. And, most assuredly, not the hikers, equestrians, the environment, or the communities of West Marin. Only the Marin County Bicycle Coalition and the bicyclists will benefit!

The MCBC has proven, time and again that it doesn't care about its impact on West Marin, nor should the National Park and GGNRA expect a change in behavior, if they are allowed access to our parks.

Please, say, "NO," to the Marin County Bicycle Coalition's request to gain access to Pt. Reyes National Seashore and the GGNRA public lands. It's not worth it. Respectfully,

Matt Lewis

#777

Name: Dyer, Deborah

Correspondence: I am very concerned about the proposal to open more trails to bicycle riders. As a hiker and equestrian, I often use some of the many trails bikers also have access to. My experience of trails is greatly impacted by the presence of bikes. They are often fast and have earbuds in, so they don't see me or hear me in time to slow down.

Please do not open up additional trails to bikers - the rest of us need trails where we can be free from the danger of bikes.

Thank you, Deborah Dyer

#778

Name: Klementovich, Joe

Correspondence: Please vote down this bill. We need as much diversity in our public lands as possible. Rare or threatened species should be valued. Thank you Joe

#779

Name: Cohen, Nathan

Correspondence: Hello,

As a mountain and road cyclist in Marin, I would like to reiterate the comments of MCBC regarding the inclusion of more bicycle access within Point Reyes. There is simply no logical reason to exclude bicycles from many of these areas and projects. Furthermore, having more connectivity on dirt and car-free paths would greatly increase the safety of bicycling in and around Pt. Reyes.

I support:

A new trail between Devil's Gulch and Platform Bridge through the Cheda, McIsaac, and Zanardi Ranches.

A plan to connect the Cross Marin Trail into Point Reyes.

Adoption of social trails off Bolinas Ridge for better connectivity and a single-track trail experience.

Extend the Olema Valley Trail to Bolinas on the east side of Highway 1.

Close gaps for bikes through ranch lands in the park, including closing the Estero Trail loop, connecting Sir Francis Drake Blvd. with Pierce Point Road, and connecting Marshall Beach to Pierce Point Road,

A more bike-friendly permit application process for road and mountain bike events in the park, including along Bolinas Ridge and out to the lighthouse.

Bike access to all ranch roads in the pastoral zone that are already open to pedestrians.

Thank you, Nathan

#780

Name: Kilty, John

Correspondence: MORE BIKE ACCESS PLEASE:

A new trail between Devil's Gulch and Platform Bridge through the Cheda, McIsaac, and Zanardi Ranches.

A plan to connect the Cross Marin Trail into Point Reyes.

Adoption of social trails off Bolinas Ridge for better connectivity and a single-track trail experience.

Extend the Olema Valley Trail to Bolinas on the east side of Highway 1.

Close gaps for bikes through ranch lands in the park, including closing the Estero Trail loop, connecting Sir Francis Drake Blvd. with Pierce Point Road, and connecting Marshall Beach to Pierce Point Road,

A more bike-friendly permit application process for road and mountain bike events in the park, including along Bolinas Ridge and out to the lighthouse.

Bike access to all ranch roads in the pastoral zone that are already open to pedestrians.

#781

Name: Post, Tom

Correspondence: This is obviously a contentious issue as NPS is getting push back from so many groups like hikers, bikers and the horse community. What do you think will happen when a mountain biker is careening down at high speed (and they will) on the Bolema Trail and they encounter a horse. The outcome could be serious like what happened in the Indian Tree area in Novato several years ago. I ride bikes on trails and love it but why allow access on trails that are not fire roads.

Sorry but bikes destroy trails, frighten wildlife and people. They have enough access in Marin County already without polluting the uniqueness of Pt. Reyes. They should stay on fire roads and not be on trails in my opinion. I have been leading Sierra Club Hikes to your beautiful area for 13 years but maybe not for much longer as I am tired of jumping off the trail to avoid being hit.

Are you going to allow bikes on the Tomales Point Trail which has plenty of wildlife and that would be ridiculous. It may not be an issue as I know you are exploring options right now to shoot the Elk which is sickening beyond belief.

I realize that you need to accommodate many different groups but giving access to bikes on trails in Pt. Reyes is wrong because the area is sensitive.

#782

Name: Steinfels, Oliver

Correspondence: Please do not allow Mountain Bikes to spoil the natural beauty of Pt. Reyes. Pt. Reyes is a unique ecosystem that may suffer irreparable harm from Mt. Bikes in the forms of erosion and damage to sensitive habitats.

Thank you,

Oliver Steinfels

#783

Name: Koford, Patricia

Correspondence: Pt. Reyes trails are some of the few left for horse back riding. I have used and loved Pt. Reyes as a horse rider for over 20 yrs. Trails are shared with walkers/hikers and a good accommodation of both has been established. To introduce bikes whether with or without motors would dramatically change the park experience. The bikers are very dangerous opponents of horse riders on the trail. They go too fast, scare, spook and otherwise annoy horses. Even the ones who try to be courteous to riders are an imposition by their very presence on the trails. Please do not take away this remaining resource for horse riders. It is a park where animals live and plants, trees, ferns, flowers can grow. It is not a raceway down hills for bikes to speed and terrorize hikers/riders. Please - bikers have plenty of pavement to use elsewhere. Leave the park to people who enjoy walking/hiking/camping/horseback riding. These are its natural uses.

#784

Name: D'Amelio, Kimberly

Correspondence: I understand that there is a push for bikers to gain access to trails at Point Reyes. I am opposed to this change. Point Reyes is my favorite place to ride my horse in the whole wide world. With only hikers and equestrians on the trails, the visitor experience is tranquil and quiet without the need to be on constant look out and listening for bikers. Many of the trails are narrow and winding. Even at a "safe" speed, a biker suddenly coming upon horses is very dangerous! Bikers in Marin County already have access to 75% of trails in the area. Please, please, please do not grant access to bikers at Point Reyes.

#785

Name: Zanardi, Louis

Correspondence: 11/28/18 Scoping Letter - Maintaining Ranch Core Historic Integrity and Ranch Stewardship

My name is Lou Zanardi and my son Wyatt Zanardi and I currently hold the lease on the 404 acre Zanardi Ranch. In 1932 my father Louis Zanardi Sr. and his family moved here and carried on the dairy operation which was formally owned by the Mazza family from 1869 to 1937. In 1937 my family purchased the property from the Mazzas and continued to run a dairy operation until 1972. From 1972 through today it has operated as a beef ranch. For over 145 years this property has been run and managed by two families.

In the Park Service historical archives you can find the following statement:

The Zanardi Ranch is significant as an intact and well-preserved example of an early Marin County dairy ranch. Practically all of the original complex remains, with few alterations and additions, and in reasonably good condition. The owners, from only two families, contributed to the important Marin County dairy industry for more than a century.

The above statement is why after graduating from college and working in industry for the past 38 years I decided to sign a 10-year lease agreement with the PRNS in 2011. I signed it because of the love and passion that my family has for the historical significance of this ranch and our community.

My family came to West Marin County in 1923 when my grandparents began ranching on a leased dairy near Tomales. In 1932 they relocated to our Tocaloma Ranch and eventually purchased the property five years later in 1937. My father (Lou Sr.) was 15 years old at the time of the relocation and was attending Tomales High School. After the move, it became necessary for my father to drop out of high school and begin working at the Tocaloma dairy ranch full time in order to support his family. From 1932 to 1972 my father managed a small heard of dairy cows which supported his parents and four siblings.

In 1957 at 40 years old, my father married my mother Anna Marie Zanardi. Anna was a widow who had four children of her own. I was born the following year. Having five children, my father continued to operate the dairy until 1972. At which point, like the other dairy ranches along Paper Mill Creek and Olema Creek, our family dairying business became too difficult to financially sustain and my father was forced to sell his dairy herd. Without the dairy operation my brothers and sister all began careers outside of agriculture. As the youngest of five I was just starting high school. My father switched to raising replacement heifers for sale and eventually also went to work as a dairy supply salesman for a business based in Petaluma.

In 1984 my father (now 67 years of age) sold the ranch to the National Park Service (NPS) as part of the GGRNA expansion. He retained a 25-year lease/reservation use permit, which included residential and agricultural use. Three years later, at age 70, my father died of cancer. My brother, Pat Martin, then moved back to the ranch and has resided in the main house for the last 34 years. Pat is currently disabled and lives in the original farm house with his wife Lynette. My son, Wyatt Zanardi, and his wife Kayla have lived in a smaller home on the ranch for the last five years. Both Wyatt and Kayla have bachelors degrees and are working professionals outside of the ranch in addition to their current ranch duties. Shortly after college in 1980, I married my wife Carol and we moved into the small house on the ranch and commuted to our jobs until 1983. This was just before the sale of the ranch to the GGNRA. In early 1984, my wife and I moved from the ranch to purchase a home in Petaluma.

In 2011, my son Wyatt and I signed a ten-year lease with the NPS. Currently we are maintaining a small beef operation with a total of 45 animal units on 404 leased acres. Given the ten-year duration of the lease signing, I was able to work with the NPS to develop a ten-year ranch plan, aimed at stewarding the land on which our ranch resides and providing ecological benefits to the surrounding natural resources. Our efforts included creating a water distribution and management plan, a grazing improvement plan and a water shed quality improvement plan. I also outlined and prioritized capital improvement suggestions which are required to maintain the structural integrity of the historical buildings on the ranch. I have tried in every way to maintain good stewardship, a clean environment, improve the land for wildlife habitat, and retain the integrity of the historic buildings for future generations and the public at large.

In 2013, I further initiated discussions with the Park Service and the National Resource Conservation Service (NRCS) to implement the plans mentioned above. All of us were in agreement and ultimately I was granted funding for a major Environmental Quality Incentive Program (EQIP). Over the next three years I personally installed and/or oversaw the implementation of two water spring developments, 7500 gallons of water storage capacity, over two and a half miles of water piping, an off- grid solar pumping system, seven water troughs and over 2100 feet of wildlife friendly fencing. Near the conclusion of the project I also was able to obtain additional support from the Marin Resource Conservation District (MRCD) to provide additional fencing areas for livestock keep-out areas for a seasonal stream. These improvements were all recognized as aiding agriculture land use through better grazing practices and water distribution, wetlands improvement, Tomales Bay watershed quality improvement and erosion prevention. Additional benefits have resulted in areas where wildlife can benefit in the spring wetlands area and gain better accessibility to water. We are also committed to helping control invasive species such as distaff thistle and pampas grass. I now have three years left on my ten-year lease. If it were not for the ten year lease I could/would not have invested the time, energy or money to make these improvements. Nor could I have asked for NRCS and MRCD to contribute since I could not guarantee that I would be able to maintain the improvements. I currently have additional improvements that I would like to make with the support of the NPS and other agencies if possible. For example, the barns are beginning to experience foundational and structural issues which need to be addressed with the aid and guidance of NPS professionals. These are listed as historical buildings. I believe that without my historical knowledge, investments and drive to be a good steward of the property, no improvements would have or will take place on this very historical and pristine place. I would like to make improvements to the original ranch buildings which date back to the 1860s and include two historic barns, the original dairy and the original ranch house.

In conclusion, the economics of this ranch make it very challenging to sustain and maintain. Without a long-term lease (20 years) it will be extremely difficult to commit to continued and necessary improvements on this historic property. I believe the community and the Park Service would lose a significant bit of cultural history if this ranch

is left to be managed and improved by resources who may not possess the same care, urgency and passion for the land and buildings as my family currently does. Thank you for considering this recommendation.

Lou and Wyatt Zanardi Zanardi Ranch

#786

Name: Owens, John

Correspondence: As a twenty seven year resident of Marin County who recreates via road and mountain bike. I would appreciate if bicycle access was granted to Pt. Reyes National Seashore. We can travel all over Mount Tam, throughout the headlands, west of Fairfax, China Camp State Park, and the Big Rock area. I love the vastness of the Point Reyes seashore and the spectacular vistas. We should have similar access as horses or hikers.

Regards, John Owens

#787

Name: Zanardi, Louis

Correspondence: 11/28/18 Scoping Letter - Request for supplemental ranching activities

I would like the General Management Plan to include allowing supplemental activities to ranching for some of the existing ranchers within the GGNRA. These activities should support the tax paying public who wish to visit the area for its cultural significance, agricultural history, outdoor activities and scenic beauty.

For example, there is a significant need for short-term and low-cost stay accommodations and facilities for outdoor explorers, hikers and bicycle riders who visit the park. Allowing the ranchers to use and improve their existing historic facilities in the ranch core areas for short-term stays for visiting outdoor enthusiasts would provide a much-needed service. These accommodations could be as simple as short-term (10 day max) room rentals in a 19th century farm house, covered outdoor eating/laundry areas, do-it-yourself bike maintenance/repair facilities and covered/lockable short-term storage for small items. In addition, some of the ranches have a significant number of historical buildings that are in reasonably good shape but require significant maintenance. In some cases the original milking (by hand) barns, draft horse paddocks, hay barns, washrooms, workers' quarters, sheds and milk processing areas are intact. These facilities could be used for interpretive historical programs and conducted by the ranchers or park volunteers.

Accommodations and programs like this could be an excellent way for the public to stay, explore and enjoy this beautiful area for a few days at minimal cost. It could also help some of the smaller ranchers who have limited agricultural earning potential maintain and sustain the historical integrity of the buildings in the currently underutilized ranch cores. Thank you for considering this recommendation.

Lou and Wyatt Zanardi Zanardi Ranch

#788

Name: Overton, Lindsay

Correspondence: I support increasing biking opportunities in Pt Reyes National Seashore, especially if measures are taken to mitigate trail user conflict. I am an equestrian as well as a mountain biker and I think both user groups need more trails! Thank you for your consideration.

#789

Name: Eckart, Charlie

Correspondence: With a home in Point Reyes Station I fully support MCBC's proposed trails in and around Point Reyes National Seashore. These are critical, yet underused connections that would allow cyclists, hikers, runners and others to explore, recreate and steward these trails. Point Reyes National Seashore is one of the most beautiful areas to ride a bicycle through yet the Park and surrounding areas are off limits to a large extent. If necessary consider a pilot period and monitor the usage. I believe you will find it fully manageable.

Respectfully, Charlie Eckart Roaring Fork Mountain Bike Association, Chairman

#790

Name: MacMillan, Gail

Correspondence: I am more than a bit disturbed that the Pt. Reyes NATIONAL SEASHORE is considering 'culling' the Tule Elk that were re-introduced here at our behest and not even looking at the growing herds of cattle on this, our PUBLIC land. I was not against ranching continuing until the 'subsidized' ranchers started to complain that wildlife was causing them an inconvenience! Excuse me, these ranches have become a polluting embarrassment over the years and their herds need to be 'culled' to a reasonable size so that THEY can co-exist with the Park. Things seem to have been turned backwards in this, a National Park!

#791

Name: KOS, JOHN

Correspondence: I support these bicycling projects, as advocated for by the Marin County Bicycle Coalition:

1. A new trail between Devil's Gulch and Platform Bridge through the Cheda, McIsaac, and Zanardi Ranches.
2. A plan to connect the Cross Marin Trail into Point Reyes.
3. Adoption of social trails off Bolinas Ridge for better connectivity and a single-track trail experience.
4. Extend the Olema Valley Trail to Bolinas on the east side of Highway 1.
5. Close gaps for bikes through ranch lands in the park, including closing the Estero Trail loop, connecting Sir Francis Drake Blvd. with Pierce Point Road, and connecting Marshall Beach to Pierce Point Road.
6. A more bike-friendly permit application process for road and mountain bike events in the park, including along Bolinas Ridge and out to the lighthouse.
7. Bike access to all ranch roads in the pastoral zone that are already open to pedestrians.

Thank you,

John Kos

#792

Name: N/A, N/A

Correspondence: I am not providing my personal information because I do not want it to be made publicly available for privacy purposes.

I do not agree with the proposal to kill the tule elk in Point Reyes. I do not believe in prioritizing the the ranchers and dairy industry over these elk. I do believe in finding ways for them to co-exist without killing them. I believe in protecting public lands and wildlife. I prefer that fencing is tried, at least.

Thank you!

#793

Name: Mitchell, David

Correspondence: Any plan for Point Reyes must ensure the survival of historic ranching there. The ranches are important for several reasons. Ranchers have been excellent stewards of the land, preserving its natural and cultural beauty with their practices.

When two US senators from the Senate Interior and Insular Affairs Committee toured Point Reyes in April 1960 to determine its fitness for parkland. The senators were impressed by what they saw and concluded this pastoral scene was perfect as it was and shouldn't be changed.

Moreover, they recognized that grazing was responsible for the appearance of some of the landscape. As a Park Service sign at the Abbott's Lagoon Trailhead acknowledges: "The open pastoral landscape of the peninsula is protected as part of the park's cultural heritage under the legislation that created the park."

The ranches in the park benefit agriculture throughout coastal Marin. For example, they give milk trucks enough business to keep serving the other dairy ranches on the coast too.

The ranches are an internal part of the West Marin community. Ranching families, for example, developed Inverness

To insure that ranchers can plan and invest for the future, they need 20-year rolling leases that renew automatically every year.

#794

Name: N/A, N/A

Correspondence: I think the ranchers should be able to give farm tours on their ranches any time they want, because the ranching families could better serve the visiting public. PRNS currently provides little education and interpretation about the seashore ranches. The public would have a better understanding of why the ranches exist within the national seashore. Farm tours would also assist the park service in their mandate to provide interpretive services to describe the working landscapes at PRNS. Farm tours may also provide an opportunity for members of the ranch family to become involved on the farm. Farm tours could be a collaborative effort shared by PRNS staff and the ranching families, building stronger relationships. This EIS should evaluate all the public benefits and other positive effects of allowing ranchers to give farm tours.

#795

Name: N/A, N/A

Correspondence: Bicycles on Point Reyes hoof/horse trails would be disastrous. I say no. They have enough trails in Marin. They will tear up the environment so fast.

#796

Name: Ramos, Susan

Correspondence: I believe existing, operational ranches should be converted and transitioned to natural habitat AFTER an owner dies or retires and his/her family does not wish to continue to operate a ranch.

#797

Name: Gainer, Mark

Correspondence: Please do not award mountain bikers access to the pristine beauty of Pt. Reyes. I live near and hike regularly in China Camp. The trails are often over run with mountain bikers sometimes, in groups of eight or more. Most are polite. However, I have to stop my hike and pull to the side (often near or in poison oak) so they can pass. Some have wobbled and almost hit me. About 10% are just jerks. Two started fights with me when I asked them to slow down. Invariable during my hike, one of the bikers jams on their brakes to avoid hitting me - - good-bye tranquility.

The trails are eroded and during when wet have large ruts in them. Horses have all but ceased here because of the bicyclists. While hikers, runners and horses share amicably, the mountain bikers are simply disruptive. They have access to much of Marin. Why do they need to ruin Pt. Reyes as well?

#798

Name: N/A, N/A

Correspondence: Hello,

My family currently lives in Point Reyes and one of the largest issues is traffic congestion. I believe Mountain Biking in the park is a fine activity and I support it as a sport. I only ask that the park considers and plans ahead for the substantial increase in traffic that will occur by adding another attraction to Point Reyes and Inverness.

#799

Name: Mannsfeld MD, Christian

Correspondence: Dear NPS,

I'd like to strongly voice my support for the below, as access to bikes in these areas will greatly improve the enjoyment of these areas to large number of people, many of whom cannot adequately get around by walking, but are mobile with bikes, especially given the greater distances that bikes can take people. Although I am not in any way in support of e-bikes.

A new trail between Devil's Gulch and Platform Bridge through the Cheda, McIsaac, and Zanardi Ranches.

A plan to connect the Cross Marin Trail into Point Reyes.

Adoption of social trails off Bolinas Ridge for better connectivity and a single-track trail experience.

Extend the Olema Valley Trail to Bolinas on the east side of Highway 1.

Close gaps for bikes through ranch lands in the park, including closing the Estero Trail loop, connecting Sir Francis Drake Blvd. with Pierce Point Road, and connecting Marshall Beach to Pierce Point Road,

A more bike-friendly permit application process for road and mountain bike events in the park, including along Bolinas Ridge and out to the lighthouse.

Bike access to all ranch roads in the pastoral zone that are already open to pedestrians.

Thank you!

Christian

#800

Name: Teichman, Judy

Correspondence: November 28, 2018

Cicely Muldoon Superintendent Point Reyes GMP Amendment EIS Point Reyes National Seashore 1 Bear Valley Road Point Reyes Station, CA 94956

Subject: Proposed Point Reyes National Seashore General Management Plan Amendment

Dear Superintendent Muldoon,

Please include an evaluation of the feasibility and benefits of revising the preferred alternative to eliminate the Drakes Beach elk herd over time by moving the elk does to a habitat in the Muddy Hollow/Limantour area that would be restored as appropriate habitat for elk and returning the historic D Ranch to active agriculture. The benefits in restoring D Ranch to active agriculture include restoring a highly visible ranch complex in this historic ranch district, ensuring that the view shed will be retained without public expense and the land will be safer for public access during all seasons, and increasing the potential for carbon sequestration on parkland. The benefits in restoring the habitat for elk in the Muddy Hollow/Limantour area by clearing out dead and flammable trees and nonnative vegetation, e.g., pampas grass, include reducing the fire fuel load in this wild land/urban corridor and restoring views on the area trails. They include bringing elk to a location more accessible to the public. The route from highway one to Muddy Hollow and Limantour Beach is much shorter than that out Sir Francis Drake to D Ranch. Reducing the traffic on Sir Francis Drake would reduce the park's negative impact on the villages of Inverness and Inverness Park as well as the State parks off Sir Francis Drake. Fewer miles driven by park visitors also means less carbon in the air.

In evaluating the feasibility of this proposal, please analyze the average annual cost and cost over time, e.g., the proposed 20 year life of the agricultural leases, to manage the D Ranch property and herd if retained as proposed and describe the consequences if the funding is not available. In considering the cost and benefits of restoring the vegetation in the wilderness area to suitable habitat for elk, please consider the initial cost and the likely maintenance cost over the 20-year life of the proposed leases in agricultural land as well as other benefits, e, g., reducing the spread of nonnative species in the park.

Thank you for the opportunity to comment on the proposed alternatives and for providing the California Fish and Wildlife recommendations on the minimum herd size for a healthy elk herd. With declining public funds for park operations, it is apparent that a bold new approach is needed to resolve the conflict between active and economically viable agriculture and a health population of tule elk in an area easily accessible to the general public.

Respectfully,

Judy Teichman Point Reyes Station

#801

Name: Lydon, Lisa

Correspondence: Please consider leaving the trails at Steward Ranch for horses and hikers only. Mountain bikes have plenty of places to go and rest of us enjoy the peace of the trails comfortable that a bike isn't going to come speeding around the corner. There are few places close to Bay Area where you can go horse camping.

Thank you for your consideration, Lisa Lydon

#802

Name: Running, Jon

Correspondence: As a mountain bike, hiker and trail runner, I strongly support trail development and land use plans for the following around Pt. Reyes and Marin:

1. A new multi-use trail between Devil's Gulch and Platform Bridge through Cheda, McIsaac and Zanardi Ranch.
2. A plan to connect the Cross Marin Trail into Point Reyes.
3. Adoption of social trails off Bolinas Ridge for better connectivity and a single-track trail experience.
4. Extend the Olema Valley Trail to Bolinas on the east side of Highway 1.
5. Close gaps for bikes through ranch lands in the park, including closing the Estero Trail loop, connecting Sir Francis Drake Blvd. with Pierce Point Road and connecting Marshall Beach to Pierce Point Road,
6. A more bike-friendly permit application process for road and mountain bike events in the park, including along Bolinas Ridge and out to the lighthouse.
7. Bike access to all ranch roads in the pastoral zone that are already open to pedestrians.

#803

Name: Reinhardt, Paul

Correspondence: A new trail between Devil's Gulch and Platform Bridge through the Cheda, McIsaac, and Zanardi Ranches.

A plan to connect the Cross Marin Trail into Point Reyes.

Adoption of social trails off Bolinas Ridge for better connectivity and a single-track trail experience.

Extend the Olema Valley Trail to Bolinas on the east side of Highway 1.

Close gaps for bikes through ranch lands in the park, including closing the Estero Trail loop, connecting Sir Francis Drake Blvd. with Pierce Point Road, and connecting Marshall Beach to Pierce Point Road,

A more bike-friendly permit application process for road and mountain bike events in the park, including along Bolinas Ridge and out to the lighthouse.

Bike access to all ranch roads in the pastoral zone that are already open to pedestrians.

#804

Name: Graves, Ian

Correspondence: I would like to register my strong support for making the area more bike friendly. The greater Point Reyes area is so special and wonderful that I would love to experience it with my whole family; improving the trails and access would let me and my daughter get out together.

Please work with MCBC, they have all my confidence.

#805

Name: Straub, Carolyn

Correspondence: I am supporting the "No Action" alternative for Point Reyes National Seashore cattle allowances:

Alternatives ALTERNATIVE A: CONTINUE CURRENT MANAGEMENT (NO

Please heed.

This is a National Seashore - and not a cattle ranch.

There are alternatives for the cattle to be, but it is not in a National Park.

Thank you for your attention.

Sincerely,

Carolyn Straub

#806

Name: BROOKS, ANDREW

Correspondence: Hi, I'm writing to voice my support for the following:

A new trail between Devil's Gulch and Platform Bridge through the Cheda, McIsaac, and Zanardi Ranches.

A plan to connect the Cross Marin Trail into Point Reyes.

Adoption of social trails off Bolinas Ridge for better connectivity and a single-track trail experience.

Extend the Olema Valley Trail to Bolinas on the east side of Highway 1.

Close gaps for bikes through ranch lands in the park, including closing the Estero Trail loop, connecting Sir Francis Drake Blvd. with Pierce Point Road, and connecting Marshall Beach to Pierce Point Road,

A more bike-friendly permit application process for road and mountain bike events in the park, including along Bolinas Ridge and out to the lighthouse.

Bike access to all ranch roads in the pastoral zone that are already open to pedestrians.

thanks very much!

#807

Name: Wieser, Jeff

Correspondence: Mountain biking is growing in popularity and if managed correctly it offers outdoor activity opportunities that can co-exist with hikers and horse back riders. If the trails are well built/maintained by IMBA volunteer groups, they will attract riders from out of the area, as well as locals and add revenue to the local economy - ie. food, gas, lodging... Quality trails will also give our children a place to be active outdoors so they gain an appreciation for our natural resources.

Thank you, Jeff Wieser

#808

Name: Kehoe, Tim and Janice

Correspondence: Thank you for giving us the opportunity to give public input regarding your upcoming General Management Plan.

We would like to share a little history of our ranch. The Kehoe Family has operated a dairy on the Point Reyes Peninsula for ninety-five years. We established our dairy and continue current operations solely on the J Ranch. We have leased from the Pt. Reyes National Seashore since its inception in 1970. My Father had taken the longest lease offered at that time, which was 30 years. We have enjoyed a good business and personal relationship with the Park and its administration over the 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 an Organic Holstein dairy that was certified organic in 2006. The milk we produce is certified organic and 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.

Our concerns to stay a viable productive organic dairy in the years to come are outlined below:

- Longer leases
- Diversification
- Stay economically competitive with other dairies outside the Point Reyes National Seashore
- Silage growth and harvesting practices
- Weed management
- Succession of family generations
- Access to alternative practices
- Timely response for authorization of projects
- Dealing with elk in a timely manner
- Formal role of government agencies in the General Management Plan
- Rangeland improvement
- Priority Additional access to growing supplemental forage
- Additional land within the Point Reyes National Seashore
- Employee Housing Longer Leases

The 20-year leases are a positive start to greater stability for the type of business that we are in. A suggestion we would like to make would be to have rolling 20-year leases. This, for example, would show a bank that we are committed to our operation and would make it easier to obtain loans or long-term investment loans if we so needed them.

Diversification

For my great grandfather and grandfather, being able to diversify was one of the key reasons J Ranch was able to survive and be passed on to the next generation. Having the opportunity to be able to return to diversification practices such as farmstead dairy products, growing grain crops, such as barley, wheat, or rye for specialty products is an option we would like to have available to our family operation. Silage or forage production has been an applied practice within the park and should remain as such. Historically, hay was produced in the early 1900's and silage were started in the mid 1970's. When ranches are able to produce their own silage or forage, it reduces the amount of feed that is imported and lessens the carbon foot print of all the ranches. I also believe that there is more bird habitat when the silage fields are growing because of the forage density. We also believe that giving each of the ranches up to 25% of their leased acreage for silage or forage production would be very beneficial for all of the ranch operations within the park.

Weed Management

Organic dairies have taken the place of conventional dairies in the Point Reyes National Seashore, and pasture and forage production are a key part of these family farms surviving for the next generation. Mowing or windrowing grasses, weeds, and brush have been proven to be a successful process that we have in controlling the spreading of evasive weeds. The bull thistle, poison hemlock, coyote brush and other problem weeds are an ongoing nuisance to our ranch specifically. The quality of our pasture is a key factor in producing high quality milk and reducing the reliance on imported feeds.

Succession of Family

Succession of family should be addressed in the GMP. Here are some of the suggestions that we see as a common-sense approach. The first choice would be to have the next generation of immediate family members taking over when the previous generation retires. If the next generation does not want to step in and take over the business, then other relatives that would be interested should have an opportunity to get involved. This is how my grandfather came to the J Ranch some 95 years ago. The second choice would be offering the ranch to neighboring ranchers which was a practice that took place in the 1900's. There needs to be alternatives if none of the family members do not want to continue, this I see is going to come in to play sooner rather than later.

Access to Alternative Practices

One of the issues that the J Ranch, as with many ranches all over the state of California, has had the last five years is a water shortage. The extreme drought has been a major problem for all ranches within the Point Reyes National Seashore over the years. Water development will be a needed to deal with this issue going forward. We have to expand on the water sources that we currently have in place. Enlarging our dam, digging more wells, or using the creek as a backup for a major water supply should be used as a plan during the drought years. We have been allowed to pump water from a creek at the Kehoe Beach Trail Head for 3 out of the last 10 years. This has rescued us as a water source for our animals in the last major drought.

Dealing with Elk in a Timely Manner

The elk situation is a major concern. Getting the elk contained by fencing them out of the pastoral zone is a problem that requires immediate action. One of the primary requirements of being organic is access to pasture. The National Organic Program rules require a dairy to provide a minimum of 30% dry matter intake for a minimum of 120 days during the pasture season. Recent conditions from the previous droughts have made this difficult enough as it is. The accumulation of the elk competing for this pasture adds additional pressure to comply with the National Organic Program standards. The National Park Service constructed a fence to contain the original elk herd on the Pierce Point Peninsula, including the Historic K (Pierce Ranch), which borders us here at the J Ranch. The additional elk herd that is located on the Historic C, D, E, and Home Ranches need to be managed for separation from the existing dairy and ranches. This is an acute problem and should be addressed in the General Management Plan. Formal Role of Government Agencies in the General Management Plan The Point Reyes National Seashore should be in a working relationship with agencies such as National Resource Conservation Service (NRCS), Resource Conservation District (RCD), University of California Cooperative Extension, and other farm service agencies that have extensive experience with animal agriculture operations. Another alternative to assist the NPS would be to partner with Marin Agriculture Land Trust on management of the Pastoral lands. They are a nonprofit and oversee 50000 acres of farm land with agriculture easements in Marin County.

Rangeland Improvement

Pasture improvements such as seeding with perennial grasses and legumes has given us more pounds per acre of feed and has lessened the use of imported hay and grain. Also, the use of disking and replanting with grass seed has been effective to remove thistle and poison hemlock. Another tool beneficial to farming would be to use an

aerator to lessen compaction on pastures and have more of an impact on pasture response when we do have years of normal rainfall. We also use No-Till seeding practices so we do not disturb highly erodible land. There also needs to be more clarity between Range Land and Pasture Land and what practices can be used on each one.

Priority to Additional Land within the Park

Currently, there are idle lands that are adjacent to the ranches in the pastoral zone that could be utilized by existing lease holders. Most of the land adjacent to the J Ranch has been overrun with coyote brush and velvet grass. If the land could be used, the cycle of evasive weeds could be curtailed and brought back into productive pasture for the lease holder. We are not wanting to exceed the 28000 acres designated for ranch lands within the PRNSS.

Employee Housing

There needs to be a process to replace and add additional housing for employees and their families. This is very important to attract highly qualified personnel.

As an organic dairy we have many rules and regulations to comply with that must be followed in order to keep our certification. These requirements reflect the ideas we presume the National Park Service would agree to be good, Best Management Practices used to take care of our land within the Point Reyes National Seashore is a priority. The GMP will hopefully address all of the issues that will arise and take a common-sense approach to the plan that the National Park Service will develop for the future of the historic ranches in the Point Reyes National Seashore.

#809

Name: C, Bob

Correspondence: I see that the local mountain biking groups in Marin County are trying to open some new trails for bikers. It's always been ironic that Marin County, the birthplace of Mountain Biking, has been particularly difficult to find legal places to ride. So, I urge you to work with the local groups to open some trails for mountain bikers. I'm sure you are aware that biking has become one of the fastest growing pastimes in America. Work with it.

Thanks,

#810

Name: N/A, N/A

Correspondence: Alternative F is the only plan to protect our native plants and wildlife in the seashore and prevent the degradation of the habitat this land was set aside to protect.

#811

Name: Scolari, Nancy

Correspondence: Thank you for the opportunity to provide comment on the formal scoping phase of 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 National Park Service (NPS) is seeking comments on what should be analyzed in the EIS, as well as on potential refinements to the proposed action and alternatives. Marin RCD offers the following comments regarding the scope of issues that the EIS should address: 1. An accounting of previously implemented management practice environmental benefits and protections. Specifically, the EIS should describe the management measures that NPS staff and the ranchers are using to safeguard water quality. These practices span multiple years and 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 the agricultural manager evaluate potential impacts to surface and groundwater from grazing livestock and manure management and implement practices that mitigate those impacts. 2. Analyze the expanded 20-year rolling lease option to include conservation, financial, maintenance and monitoring benefits. The NPS ranching community currently does not have access to state funding programs outside of the rancher's current 5-year lease window. 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. 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. The Marin RCD supports the 20-year rolling lease option and believes it should include an analysis of expanded conservation grant funding opportunities. The 20-year lease option will open up financial opportunities to fund additional restoration and conservation activities within ranching areas. A 20-year rolling lease that automatically renews every year 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. Furthermore, the assurance of tenancy supports continuous land management and maintenance requirements (i.e. erosion control and weed management) transcending NPS budget cuts associated with changes in administration. These in-kind maintenance and monitoring commitments may also be used to leverage outside funding. 3. Conservation Carbon Farm Planning that accounts for environmental benefits while allowing flexibility and diversification in land stewardship. County, state and federal partners have been engaged in an effort to work with local ranchers to complete individual carbon farm plans that support a regenerative and resilient agricultural landscape. Ranch 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 in the planning process including Prescribed Grazing, Range Seeding, No-till/Reduced Tillage, Fencing, Weed Management, Hedgerows, Compost Application, Riparian/Wetland Buffers and many more (See List of Practices: [http://comet-planner.nrel.colostate.edu/COMET-Planner Report Final.pdf](http://comet-planner.nrel.colostate.edu/COMET-Planner%20Report%20Final.pdf)). 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 and the USDA NRCS Environmental Quality Incentives Program. They are designed to 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/mgnt/?cid=s_telprdb1257753).

Many of the conservation practices support our farmers and ranchers in enhancing sensitive ecosystems (windbreaks, buffer strips, grassed waterways, hedgerows, riparian forest buffers, silvopastures). They are designed to increase infiltration rates and decrease runoff, thereby reducing sediment and nutrient loading to streams. These benefits should be evaluated in the EIS. The Marin RCD's 2018 Marin Permit Coordination Program CEQA Initial Study contains many of the benefits offered by these practices (See Initial Study Starting on page 66 of: <https://www.marinrcd.org/wp/wpcontent/uploads/2018/06/MarinPermitCoordinationProgram.2018.06.15.pdf>). Carbon farming practices, when managed well, offer exceptional greenhouse gas reduction and carbon sequestration benefits which can significantly offset visitor impacts. The application of organic amendments to soils has the ability to 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). The connection of greenhouse gas impacts from NPS visitors and potential offsets from carbon sequestration practices should be made and could be an incredible educational opportunity to the greater public in describing the co-benefits that agriculture can provide in a natural setting. Finally, a diverse suite of management practices should enable NPS ranchers to participate in research trials and demonstration projects. Flexibility should be provided to allow ranchers to embrace innovative farming methods including alternative energy systems as a way to improve resiliency to climate and market shifts. 4. A Rancher Advisory Council to support enduring and cooperative stewardship based agricultural land management activities that consider management decisions consistent with local planning priorities. An advisory council, containing representatives from local, state and federal agencies and organizations, can work with NPS to help inform and guide a sustainable future for agriculture including the diversification of agricultural activities adjacent to sensitive environments. Consequently, NPS staff will be supported by a team dedicated to the planning and application of regenerative practices on agricultural lands. An advisory council can guide a robustly supported land stewardship program and provide the perfect opportunity to model ranching and ecosystem health and the mutual benefits offered by both. This option should include access to 2 full-time permanent rangeland staff that will facilitate the implementation of stewardship practices through careful design, permitting and construction. This structure will provide a support system that will broaden NPS' agricultural knowledge, provide technical assistance to the ranchers, enable ranchers to complete conservation projects expeditiously and result in the increased implementation of stewardship practices. 5. Elk outside the pastoral zone. NPS ranches constitute 19% (\$18.3M) of total agricultural production in Marin County. Their survival is essential in sustaining a local food source and local agricultural businesses/jobs for Marin County residents. Consequently, the health of our natural environment is essential to agriculture's sustainable future. The Marin RCD supports a thriving elk population outside the pastoral zone. 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, including separation of cattle and elk, that respond to and reflect these differences to effectively relieve those conflicts.

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. Please do not hesitate to contact us for additional information or clarification (415) 663-1170.

#812

Name: N/A, N/A

Correspondence: I am a life long cyclist that used to live in Marshall Ca. I would love to be able to ride to the coast and camp in Point Reyes NS but find the available trails open to bicycles too limiting to have much of an adventure.

I am also a member of the Marin County Bicycle Coalition and they have the following suggestions which I fully support: A new trail between Devil's Gulch and Platform Bridge through the Cheda, McIsaac, and Zanardi Ranches.

A plan to connect the Cross Marin Trail into Point Reyes.

Adoption of social trails off Bolinas Ridge for better connectivity and a single-track trail experience.

Extend the Olema Valley Trail to Bolinas on the east side of Highway 1.

Close gaps for bikes through ranch lands in the park, including closing the Estero Trail loop, connecting Sir Francis Drake Blvd. with Pierce Point Road, and connecting Marshall Beach to Pierce Point Road,

A more bike-friendly permit application process for road and mountain bike events in the park, including along Bolinas Ridge and out to the lighthouse.

Bike access to all ranch roads in the pastoral zone that are already open to pedestrians.

Thanks, Bob

#813

Name: Wright, Steve

Correspondence: Hello, I am a Father of two boys, voter, tax payer, professional in education technology, little league coach, cub scout leader, avid outdoorsman, and Mountain biker here in Marin County.

Please support these initiatives to bring more access to mountain biking in Marin County and nearby areas:

A new trail between Devil's Gulch and Platform Bridge through the Cheda, McIsaac, and Zanardi Ranches.

A plan to connect the Cross Marin Trail into Point Reyes.

Adoption of social trails off Bolinas Ridge for better connectivity and a single-track trail experience.

Extend the Olema Valley Trail to Bolinas on the east side of Highway 1.

Close gaps for bikes through ranch lands in the park, including closing the Estero Trail loop, connecting Sir Francis Drake Blvd. with Pierce Point Road, and connecting Marshall Beach to Pierce Point Road,

A more bike-friendly permit application process for road and mountain bike events in the park, including along Bolinas Ridge and out to the lighthouse.

Bike access to all ranch roads in the pastoral zone that are already open to pedestrians.

Thank You!

Steve

#814

Name: Kehoe, Tim

Correspondence: The Point Reyes Seashore Ranchers Association (PRSRA), on behalf of all of its members, 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") General Management Plan (GMP) Amendment process and submits this response to the Notice of Intent To prepare an Environmental Impact Statement for a General Management Plan Amendment published in the Federal Register on October 31,

2018. The Notice of Intent requests scoping comments on the purpose and need and alternatives and this letter is the PRSRA's response to the request for comments. Last year, the Association commented on the Park Service's request for comment. Our comments on the current Notice of Intent build on our prior comments, and incorporate issues addressed in the legislative and report language for H.R. 6687. Many individual ranchers will be submitting separate comments also.

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 in 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.

Accordingly, we offer the following big-picture comments for consideration during this public comment period and we will participate fully in subsequent stages and opportunities to discuss the future of the GMP for the Point Reyes National Seashore and Golden Gate National Recreation Area. 1

I. Purpose and Need The Purpose and Need is a framework establishing the long-term management of the 28,000-acres also known as agricultural property under the Point Reyes Act. This comprehensive direction should include the overall goals for sustainable dairy and beef ranching in the Seashore with lease terms of 20 years and provide for separation of elk and working ranches and organic dairies.

Ranching has a long and important history on the Point Reyes peninsula and adjacent National Park Service (NPS) lands. In fact, the Department of Interior recently designated the Point Reyes Peninsula Dairy Ranches Historic District and the Olema Valley Dairy Ranches Historic District on the National Register of Historic Places. These working ranches are a vibrant part of the culture of the Point Reyes National Seashore and represent an important contribution to the superlative natural and scenic resources of these NPS lands. Protection of these diverse and unique resources is an important responsibility shared by the NPS and Seashore ranchers within the agricultural property. We request that the purpose and need explicitly acknowledge these concerns and suggest the following edits to the proposed purpose and need in the Notice of Intent.

Purpose The purpose of the EIS for the General Management Plan Amendment is to establish guidance for the preservation of natural and cultural resources and manage agricultural property consistent with Congress' long-standing intent that working dairies and ranches continue to be authorized to operate on agricultural property as part of the Seashore's unique historic, cultural, scenic and natural values including the management of infrastructure and visitor use within the planning area. The alternatives evaluated in the EIS will also address the future management of Tule elk and leased ranch lands and the effective separation of elk from working ranches and dairies.

Need Action is needed at this time to address the park's highest priority planning issues which include the management of approximately 28,000 acres of land currently leased for ranching. There is a need to address concerns related to Tule elk impacts on the environment and working dairies and ranches. There is a further need to provide clear guidance and streamline processes for Seashore and regulatory review of proposed ranching activities including best management practices that promote protection of Seashore resources. Action is also needed to comply with the terms of the Settlement Agreement which requires that the GMP Amendment and EIS be completed on or before July 14, 2021. II. Alternatives While the Settlement Agreement identified three alternatives that were to be evaluated in the Environmental Impact Statement (EIS), it is also clear that the National Park Service must consider a full range of alternatives that include additional options for Point Reyes. The NPS GMP Notice of Intent includes the three Settlement Agreement alternatives. However, we urge consideration of several modifications or additional alternatives. We envision a somewhat expanded alternative building off the "Continued Ranching Alternative" proposed by NPS whereby NPS would allow for limited

additional opportunities in farming and diversified agricultural production which is historically and culturally consistent on these agricultural properties, to complement existing ranching and dairy activities. We believe that such limited additional uses would provide multiple economic and educational benefits to the community and would strengthen the overall local food supply and local economy of our region. We are not proposing in this alternative expanding beyond the current 28,000-acre agricultural property. In addition, under this alternative, NPS should consider a somewhat longer lease term (25-30 years) for ranches and dairies to facilitate investments in our agricultural infrastructure that will make us more productive, efficient, and protective of the environment. The added term can help us amortize such measures in a sustainable, long term fashion. An additional modification to this Continued Ranching Alternative would be consideration of forage improvement practices which could result in modest additions to existing herds and dairy farms consistent with water quality improvements and carbon sequestration practices. We also ask NPS to include an alternative or modify existing alternatives that would remove the free-range elk herds (Drakes Beach and Limantour) from the agricultural properties. This would provide the best solution for addressing ongoing conflicts that occur to historic ranching, and cultural resources. The 1998 Elk Management Plan provides for this and the nearly 20 years of mixed and frustrating results in implementing alternative practices to reduce conflicts in forage use and infrastructure upkeep demonstrate why this alternative has merit. The scoping notice description of alternatives is misleading in that it presumes today's extent of the elk herds is currently approved in the existing GMP. That said, we fully support continuation of Tule Elk in other areas within the Seashore. There are about 86,000 acres in the Seashore and GGNRA administered by the Seashore Park Service staff. Of the total acres, 33,000 acres are Wilderness and only 28,000 acres are agricultural property. Many of the acres on the agricultural property are certified organic which requires that livestock graze on natural grass. If Tule Elk deplete the available forage, it threatens the organic certification of the ranches, and their beef and dairy products. Ranches without sufficient pasture will never be able to gain certification. Therefore, we believe an alternative is required that includes effective separation of the Tule Elk from the agricultural property while allowing the elk on the 53,000 acres of non-agriculture property. We suggest that the "Reduced Ranching" alternative contains no justifiable rationale for its proposed elimination of specific ranches containing no residences and should be amended to reduce ranching only where there is an arguably justifiable reason. No such reason is apparent in this initial description of the alternative nor is it consistent with Congressional intent. Finally, we also urge the Park Service to consider the attached Community Alternative. All ranching alternatives should include provisions for housing on the Seashore that maintains and supports the historic dairies and ranches. In particular, the alternatives should include provisions for making underutilized or replacement housing available for the farm workforce and retaining their existing housing.

II. Issues

A. Economic analysis Reducing or eliminating ranching and dairies from Point Reyes would have profound adverse economic consequences for the local and regional economy and reduce the availability of high quality food grown from our region. These family ranches are essential to many local and regional businesses and represent an important cultural and economic way of life that extends beyond the Seashore. The ranches are a critical part of that cultural mosaic of estuaries, lagoons, ridges, hillsides, forests, and beautiful grasslands that make up the overall environment which in turn attract thousands of visitors every year. Without the stewardship of the ranching community, much of this landscape would not be there today. The GMP and EIS must assess these positive and important economic benefits not only to the ranching and dairy families but to the broader region as a whole. Local employment, changes to demographics, and local community well-being must be considered. Even our local school system is heavily dependent upon the enrollment of students from ranching families and their employees' families.

B. Environmental Stewardship and Best Management Practices The Association and the individual ranching families support implementation of best management practices (BMP) for ranching, dairying, and other agriculture activities. The GMP and accompanying EIS should evaluate these BMPs to ensure their applicability, practicality, and success in protecting the environment and ensuring economic viability all of which is consistent with federal, state, and local requirements. As we have done frequently in the past, the ranching community is prepared to step forward to assist with important environmental projects ranging from preserving threatened

species to improving water quality. We continue to be willing participants in considering, where feasible and necessary, other environmental measures that may add to the success of BMPs in protecting the natural values of the Seashore. EIS should include accomplished conservation projects and practices achieved with other agency partners. EIS should also include future opportunities to accomplish the same resource conservation through water quality, air quality, and soil management programs and partnerships. These partner agencies include Natural Resource Conservation Service, Marin Resource Conservation Service, Bay Area Air Quality Management District, UC Cooperative Extension and USDA Farm Service Agency.

educational/tourism program celebrating the cultural history of the area and ranching and agriculture's contribution to that history. Consideration of on-farm grown and stored livestock feed of silage and hay should be included in this examination. This long-standing farming practice combines the benefits of critical seasonal forage production with effective weed management, balanced herd nutrition and distribution management. It also reduces the need for imported supplemental feed and incentivizes effective on-site resource use and ranch resiliency. We agree with the statement in the Notice of Intent that "the proposed action would include opportunities for operational flexibility and diversification." 83 Fed. Reg. at 54776 (October 31, 2018).

E. Operational Flexibility Regular infrastructure maintenance and repair at the Seashore has often been delayed for extended periods of time in part because guidelines are unclear or nonexistent. The GMP should contain more specific guidelines so critical work can be efficiently authorized by NPS in the future. In the coming months while the GMP progresses, we would welcome a working group to develop appropriate guidelines to assist the agency in more efficient and timely decision-making and allow effective management of weeds, fire fuels, water quality protection, livestock watering and distribution, and other field and ranch level concerns. We agree with the statement in the Notice of Intent that "the proposed action would include opportunities for operational flexibility and diversification." 83 Fed. Reg. at 54776 (October 31, 2018).

F. Succession We encourage the GMP and EIS to review the all-important issue of succession to current and future leases. One overall goal of NPS should be to ensure that current families continue their stewardship of existing ranch and dairy lands and provide a continuity of ownership going forward. But in the event that families choose not to continue ranching and dairying, how best can NPS continue agricultural operations on the affected land? The key operative is to continue this rich heritage and the environmental stewardship that accompanies it. Thinking through the issue of succession with the families of current lessees, and then, if necessary (if a family can no longer continue ranching), looking to other parties interested in continuing ranching and agriculture at the Seashore should be a component of the GMP. Within this framework, we know the past experience and judgment of existing ranching families will provide important guidance to NPS.

G. Leases To ensure consistency and facilitate clear understanding of forthcoming requirements and operational issues, it would be helpful for the GMP and EIS to contain a draft lease template. We urge NPS to meet with PRSRA and individual ranchers to discuss past leasehold provisions and where new approaches can be adopted to reflect important on-the-ground considerations. Consistent with Interior Secretary Salazar's commitment to 20-year leases and consistent with H.R. 6687, the GMP and EIS should issue leases and special use permits of 20 years for working dairies and ranches on agricultural property unless there is no willing lessee, or unless a rancher desires a lease shorter than 20 years. As part of this analysis, prior to expiration of the proposed 20-year term, steps should be provided for renewing and issuing new leases. The Association appreciates the opportunity to provide these initial comments and we look forward to working with NPS on all subsequent stages of the GMP and EIS. Based on the purpose and need for action the Community proposed action includes the following elements:

- Issue agricultural lease/permits with 20-year terms to existing ranch families to continue beef and dairy and associated agricultural operations on approximately 27,000 acres within the planning area.
- 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.
- Explore opportunities for ranch operational flexibility and diversification, establish up to approximately 900 acres of collaboratively managed resource protection buffers,

and provide a programmatic review and approval process for operational flexibility, diversification and best management practices. • Tule elk would be managed for effective separation from ranches. No elk herds would be allowed to establish in the planning area. • The NPS would implement a strategy prioritizing maintenance of historic buildings on ranches in collaboration with seashore ranchers. Prioritization would take into account historic preservation goals and the needs of ranch operations. In some cases, adaptive reuse of historic buildings would be considered to support diversification activities. • NPS would implement strategies to remove non-native, invasive plants and to manage special status plants in collaboration with seashore ranchers. • Strategies for the management of historic ranch complexes within the planning area but not part of currently active ranch operations would be identified including: prioritization of specific buildings, structures, and landscapes for preservation based on their importance to the overall integrity of the historic district and opportunities for adaptive reuse. As appropriate, the seashore would evaluate potential for decommissioning/deconstruction of low priority or substantially degraded structures/complexes as part of this plan.

The community proposed action represents one alternative that should be considered during the EIS process.

#815

Name: Valdivia, Lynn

Correspondence: I want convey my support for the following projects to create safe, enjoyable and environmentally friendly bike access to public lands:

A new trail between Devil's Gulch and Platform Bridge through the Cheda, McIsaac, and Zanardi Ranches.

A plan to connect the Cross Marin Trail into Point Reyes.

Adoption of social trails off Bolinas Ridge for better connectivity and a single-track trail experience.

Extend the Olema Valley Trail to Bolinas on the east side of Highway 1.

Close gaps for bikes through ranch lands in the park, including closing the Estero Trail loop, connecting Sir Francis Drake Blvd. with Pierce Point Road, and connecting Marshall Beach to Pierce Point Road,

A more bike-friendly permit application process for road and mountain bike events in the park, including along Bolinas Ridge and out to the lighthouse.

Bike access to all ranch roads in the pastoral zone that are already open to pedestrians.

#816

Name: Schlesinger, Susie

Correspondence: Alternative B I would like to comment on the NPS proposed action for the continued ranching and management of the Drakes Beach tule elk. As a Marin rancher I am in favor of allowing the ranches to have a 20 year lease such that they can make the necessary improvements to be able to keep their operations viable. With the flexibility for diversification, and best management practices, including the conservation of the natural resources is in my opinion a "win win for all." As we are facing challenging climate times this allows for the ranches to prepare for situations that will occur.

I am also heartened that there will be a population threshold for the el and that their impact to the ranches will be addressed. I have recently learned that this area now has historical standing and that should also figure into the preservation of these ranch buildings. I have watched as the NPS has over the years demolished buildings and hamlets as if to rewrite the Park's landscape. I was involved years back in trying to save Lairds Landing and saw how differently it was viewed by NPS. This landscape has had a very important history and to not give credence to what has been here and what is here gives a false impression and no longer tells the true story of this very special

place and the ranching families who are still here. I believe that there is a willingness and spirit of cooperation within the ranching community to-do "the right thing". They have been good stewards and with input from NPS and the security of 20 years leases the Park can be a model for other National Parks. Thank you for letting us weigh in on these matters. I am in support of Alternate B.

#817

Name: Felix, Bonnie

Correspondence: I would find any alternative acceptable IF it is consistent with the Park's mission as stated. This means NOT allowing any action or practice which is NOT in keeping with protecting all plant and animal life - - preserving flora and fauna, as it currently exists within the Park. This includes STOPPING THE DEGRADATION OF GRASSLAND by trampling, not managed grazing, and NOT ALLOWING THE REMOVAL OF THE TULE ELK.

#818

Name: Lee, Jia Hui

Correspondence: I am a Bay Area native. I strongly oppose allowing any ranchers to graze cattle on public lands. This is an outdated model and a giveaway to cattle ranchers; it has no benefit to the public and is a detriment to the wildlife on these lands, especially to the native tule elk. It is time for the Bay Area to show an enlightened way forward. Now, more than ever, we need to protect natural habitats for wildlife and future generations of the public, and this precludes grazing livestock. It is ecological imperialism. It is a no win for the public to continue to give away the public commons to select private interests. Please let California stand for protecting natural habitats and wildlife from private commercial industry

#819

Name: Hoffman, philip

Correspondence: Dear NPS, Please fulfill your obligation to protect the natural environment by ending the ranching leases PORE peninsula . Do not extend the leases. Ranching is historically incompatible with the natural environment, as seen with the present conflict with ranching and the Tule elk herd within the park. If the leases are extended the situation is only going to get worse. The ranching in the bay area is under pressure because the ranchers have sold out to developers. Now they want special treatment by NPS on public lands. I say no to this. The calamity with the oyster company should be a warning to the NPS. NO TO EXTENDED LEASES. Thank you, Philip Hoffman

#820

Name: Nixon, Brian

Correspondence: Hello,

I am writing in strong support of improved non motorized bike access to Point Reyes National Seashore. Some suggestions are:

1. Bike access to all ranch roads in the pastoral zone that are already open to pedestrians.
2. Extend the Olema Valley Trail to Bolinas on the east side of Highway 1.
3. Adoption of social trails off Bolinas Ridge for better connectivity and a single-track trail experience.
4. A plan to connect the Cross Marin Trail into Point Reyes.
5. A new trail between Devil's Gulch and Platform Bridge through the Cheda, McIsaac, and Zanardi Ranches.

6. Better connectivity for bikes through ranch lands in the park. Including connecting the Estero Trail loop, connecting Sir Francis Drake Blvd. with Pierce Point Road, and connecting Marshall Beach to Pierce Point Road.

-Brian

#821

Name: N/A, N/A

Correspondence: I support the following projects:

A new trail between Devil's Gulch and Platform Bridge through the Cheda, McIsaac, and Zanardi Ranches.

A plan to connect the Cross Marin Trail into Point Reyes.

Adoption of social trails off Bolinas Ridge for better connectivity and a single-track trail experience.

Extend the Olema Valley Trail to Bolinas on the east side of Highway 1.

Close gaps for bikes through ranch lands in the park, including closing the Estero Trail loop, connecting Sir Francis Drake Blvd. with Pierce Point Road, and connecting Marshall Beach to Pierce Point Road,

A more bike-friendly permit application process for road and mountain bike events in the park, including along Bolinas Ridge and out to the lighthouse. Bike access to all ranch roads in the pastoral zone that are already open to pedestrians.

#822

Name: Suliteanu , Ben

Correspondence: I grew up in the Marin County area. Naturally, I was shaped by the landscapes that are here. From the rolling hills at the base of Mount Tam to the summit to the expansive forests of Bolinas Ridge and the rugged coastlines.

Mountain biking became a part of my life when I was 13. I joined the Redwood High School Mountain bike team and became immersed in the sport. Racing aside, nothing beat exploring different parts of Marin on the saddle with friends.

It would be a dream to see the realization of new legal trails on the Pt Reyes area. Over the course of the last 10 years, we Marin mountain bikers haven't had too much to be excited about. We urge you to consider opening up new opportunities for us to explore this area on two wheels.

Thank you!

#823

Name: N/A, Jeff

Correspondence: I support the recommendations the Marin County Bicycle Coalition asked for:

1. A new trail between Devils Gulch and Platform Bridge through the Cheda, McIsaac, and Zanardi Ranches.
2. A plan to connect the Cross Marin Trail into Point Reyes.
3. Adoption of social trails off Bolinas Ridge for better connectivity and a single-track trail experience.

4. An extension of the Olema Valley Trail to Bolinas on the east side of Highway 1.
5. Gap closures for bikes through ranch lands in the park, including closing the Estero Trail loop, connecting Sir Francis Drake Blvd with Pierce Point Road, and connecting Marshall Beach to Pierce Point Road.
6. A more bike-friendly permit application process for road and mountain bike events in the park, including along Bolinas Ridge and out to the lighthouse.
7. Bike access to all ranch roads in the pastoral zone that are already open to pedestrians.

After more than 30 years of modern "mountain biking", Marin County remains one of the worst places in the USA to ride a mountain bike off pavement, mostly because hikers and equestrians didn't like these new trail users in the 1980's and successfully got bicycles banned from all trails (fire roads are not "trails"... but can be useful for connectivity and keeping bicyclists off busy paved roads). Over the past 30 years, the mountain biking community has grown up, become a legitimate and educated trail user... yet the anti-bike activists in Marin have only become more and more entrenched in trying to keep bikes off "their" turf, even though we are talking about public lands. Sorry folks, it isn't 1978 anymore!

It is time to pull the proverbial band-aid off and allow reasonable access and trail development in Pt. Reyes to accommodate the large (and growing), healthy and friendly bicyclist population. I'm sure you are sick of the hysterical complaining by equestrians and hikers (about bikes)... and I'm sure you'll get sued if you do something that benefits bicycling, but to do nothing that helps bicycling only kicks the can down the road while accidentally promoting non-compliant riding and even more trail user conflict. You do realize that most trail conflict is one person upset that someone else isn't "following the rules" (by simply being on a trail) vs. irresponsible and rude behavior, right? Provide some access and nobody has to get uppity at others for merely existing... they can just say "howdy, great day today, enjoy it!" ... as they pass each other.

Thank you for being open to bicycling in Pt. Reyes. Please do the right thing and adopt MCBC's proposals and help put a little shine on the birthplace of modern mountain biking. If for some reason, new found bike access isn't working for some realistic reason, you can always shut it down or try something different then.

#824

Name: Atkinson, William

Correspondence: I support the following projects:

A new trail between Devil's Gulch and Platform Bridge through the Cheda, McIsaac, and Zanardi Ranches.

A plan to connect the Cross Marin Trail into Point Reyes.

Adoption of social trails off Bolinas Ridge for better connectivity and a single-track trail experience.

Extend the Olema Valley Trail to Bolinas on the east side of Highway 1.

Close gaps for bikes through ranch lands in the park, including closing the Estero Trail loop, connecting Sir Francis Drake Blvd. with Pierce Point Road, and connecting Marshall Beach to Pierce Point Road,

A more bike-friendly permit application process for road and mountain bike events in the park, including along Bolinas Ridge and out to the lighthouse.

Bike access to all ranch roads in the pastoral zone that are already open to pedestrians.

#825

Name: Marich, Mitch

Correspondence: I would like to communicate the strong support of the Mount Wilson Bicycle Association for the Marin County Bicycle Coalition's proposals for bike access in the Point Reyes National Seashore. As an organization, we are a partner with the USFS Angeles National Forest in maintaining trails and educating trail users and are very familiar with all issues related to mountain biking on public land. Personally, I have visited Pt. Reyes and know that it is a suitable area for multi-use trails. While each specific proposal should be evaluated individually, the bias should be to have multi-use trails.

Thank you for your consideration.

#826

Name: N/A, N/A

Correspondence: Hello

Please consider improved bicycle access at the PRNS including:

A new trail between Devil's Gulch and Platform Bridge through the Cheda, McIsaac, and Zanardi Ranches.

A plan to connect the Cross Marin Trail into Point Reyes.

Adoption of social trails off Bolinas Ridge for better connectivity and a single-track trail experience.

Extend the Olema Valley Trail to Bolinas on the east side of Highway 1.

Close gaps for bikes through ranch lands in the park, including closing the Estero Trail loop, connecting Sir Francis Drake Blvd. with Pierce Point Road, and connecting Marshall Beach to Pierce Point Road,

A more bike-friendly permit application process for road and mountain bike events in the park, including along Bolinas Ridge and out to the lighthouse.

Bike access to all ranch roads in the pastoral zone that are already open to pedestrians.

Thanks!

#827

Name: Baillie, Gilbert

Correspondence: Please grant access to bikes. As a family of 5 it's an amazing way to get my kids outdoors. More options for us the better. Cheers

#828

Name: MATTEONI, JIM

Correspondence: I fully support bike trails in the below areas:

A new trail between Devil's Gulch and Platform Bridge through the Cheda, McIsaac, and Zanardi Ranches.

A plan to connect the Cross Marin Trail into Point Reyes.

Adoption of social trails off Bolinas Ridge for better connectivity and a single-track trail experience.

Extend the Olema Valley Trail to Bolinas on the east side of Highway 1.

Close gaps for bikes through ranch lands in the park, including closing the Estero Trail loop, connecting Sir Francis Drake Blvd. with Pierce Point Road, and connecting Marshall Beach to Pierce Point Road,

A more bike-friendly permit application process for road and mountain bike events in the park, including along Bolinas Ridge and out to the lighthouse.

Bike access to all ranch roads in the pastoral zone that are already open to pedestrians.

#829

Name: Anspach, Stephen

Correspondence: I am writing to voice my support for improving bike access to our public lands in and around the Pt. Reyes National Seashore.

Specifically, I respectfully request your support for:

A new trail between Devil's Gulch and Platform Bridge through the Cheda, McIsaac, and Zanardi Ranches.

A plan to connect the Cross Marin Trail into Point Reyes.

Adoption of social trails off Bolinas Ridge for better connectivity and a single-track trail experience.

Extend the Olema Valley Trail to Bolinas on the east side of Highway 1.

Close gaps for bikes through ranch lands in the park, including closing the Estero Trail loop, connecting Sir Francis Drake Blvd. with Pierce Point Road, and connecting Marshall Beach to Pierce Point Road,

A more bike-friendly permit application process for road and mountain bike events in the park, including along Bolinas Ridge and out to the lighthouse.

Bike access to all ranch roads in the pastoral zone that are already open to pedestrians.

Thanks for your consideration and support in this matter.

#830

Name: Parker, John

Correspondence: I support the following projects:

A new trail between Devil's Gulch and Platform Bridge through the Cheda, McIsaac, and Zanardi Ranches.

A plan to connect the Cross Marin Trail into Point Reyes.

Adoption of social trails off Bolinas Ridge for better connectivity and a single-track trail experience.

Extend the Olema Valley Trail to Bolinas on the east side of Highway 1.

Close gaps for bikes through ranch lands in the park, including closing the Estero Trail loop, connecting Sir Francis Drake Blvd. with Pierce Point Road, and connecting Marshall Beach to Pierce Point Road,

A more bike-friendly permit application process for road and mountain bike events in the park, including along Bolinas Ridge and out to the lighthouse.

Bike access to all ranch roads in the pastoral zone that are already open to pedestrians.

#831

Name: DeLaure, Maximilian

Correspondence: Thank you for the opportunity to comment. I do much hiking in Point Reyes, and parts of it would be ideal for mountain biking with my family, especially since it is so vast. It is time to review current connectivity gaps and loop opportunities for mountain biking. All improvements for mountain biking can also be shared with hikers, and the two uses are very compatible.

Here are some suggestions:

A new trail between Devils Gulch and Platform Bridge through the Cheda, McIsaac, and Zanardi Ranches.

A plan to connect the Cross Marin Trail into Point Reyes.

Adoption of social trails off Bolinas Ridge for better connectivity and a single-track trail experience.

Extend the Olema Valley Trail to Bolinas on the east side of Highway 1.

Close gaps for bikes through ranch lands in the park, including closing the Estero Trail loop, connecting Sir Francis Drake Blvd. with Pierce Point Road, and connecting Marshall Beach to Pierce Point Road,

Bike access to all ranch roads in the pastoral zone that are already open to pedestrians.

Thank you for your consideration.

#832

Name: Cummings, Earle

Correspondence: During my career with the California Department of Fish and Game, I worked in the Wildlife Investigations Laboratory in the 1970's. One of the activities I was involved in was to collect native blacktail and introduced fallow and axis deer for parasites and pathogens that would be a problem for the proposed re-introduction of elk to the National Seashore. We found there were several disease agents or parasites that were brought there by livestock. Remember that livestock were present on the land from very early days, before veterinary science was in place and the deer, both introduced and native were susceptible. There is no economical way to prevent the passage of communicable diseases from livestock to susceptible wildlife. If the elk were all confined to pens and barns, they might be treated when an outbreak occurs, but that would be inconsistent with the goal of a natural preserve. On the other hand, the original agreement with landowners and local government which made the park possible called for livestock practices to continue.

My hope is that the intent of the original agreement can be followed and both livestock and elk can use the land, but the livestock need to be scrupulously cared for to ensure they don't transmit viruses, liver flukes and other pathogens to the elk and other wildlife, and the wildlife should be sampled from time to time to monitor the incidence of those pests.

#833

Name: Peil, Christina

Correspondence: I am a Bay Area resident and I strongly oppose allowing ranchers to graze cattle on our public lands. This is an outdated model and a giveaway to cattle ranchers, it has no benefit to the public and is a detriment to the wildlife on these lands. It is time for the Bay Area to show an enlightened way forward. Now, more than ever, we need to regenerate our ecosystems and protect wildlife habitats, and this precludes grazing livestock. It is a no win for the public to continue to give away the public commons to select private interests. Please let California stand for prioritizing the environment over private commercial industry.

#834

Name: Castiaux, Ernest

Correspondence: NPS,

The hiking public is being abused by the mountain bikers.

I believe that this is valid recreation activity, however it does not belong on additional areas at Point Reyes. While hiking at Point Reyes enjoying the peace on a single track trail, I had to jump off trail more than once to avoid being hit by mountain bikers. . I urge the NPS to recognize the need for areas for exclusively hiking and not open up any more trails to mountain bikers. Many who do not follow the current use restrictions do not need additional trails.

Ernest Castiaux

#835

Name: Wilson, Greg

Correspondence: As a Marin resident who hikes, bikes and even occasionally horseback rides in our beautiful backyard nature, I just want to voice support for the mission of the MCBC. All they seek is fair trail access and connectivity...not exclusionary perspectives of a minority of vocal supporters in other user groups. I just wish we could all respectfully get along and share smiles when we encounter one-another on the public lands that EVERYONE should have access to. I will also, happily, volunteer my time to help work on trails to ensure that they are safe (assuming the great costs of this work sometimes prevents projects like this from moving forward).

#836

Name: Luzzi, Lisa

Correspondence: I would like to see access for bikes expanded in the Point Reyes National Seashore and surrounding GGNRA managed lands and across the many private Ranch Lands in the area. The Estero trail has been improved, but only half of it is open to bikes, it would be nice to be able to continue across the peninsula to Muddy Hollow. This trail also has been greatly improved and was previously open to bikes. Why was it closed? There is no legal off road route to access the beaches in the Seashore, this is greatly needed. The Muddy Hollow Trail would be a perfect recreational opportunity for families with young children.

I also support the proposal that MCBC has submitted and that Access4Bikes has endorsed. Our sport continues to grow, but the access in Marin is lessening. This equation is not sustainable. Please consider adding more connectivity and recreational opportunities for this human powered activity.

Lisa Luzzi Inverness Park

#837

Name: Baker, Don

Correspondence: This is in regard to bike trails in Pt. Reyes. As a long time user of the trails, Visitor Center and parking areas, and backpack sites at Pt. Reyes I understand there is pressure from a bike lobby to open up more trails to bikers. I already know there are trails with bikes on them, from the gentle flat trails to the smaller and more curved trails. I have encounter fast and impolite bikers on these smaller trails. I go to Pt. Reyes to relax, take in nature, and NOT be inundated by mechanical, fast moving bikes that disturb what otherwise would be a calming spirit of a wilderness experience. I have friends who are bikers and certainly it is not about them but I do think we need to draw the line just as much for cars or even certain areas for hikers to keep the current trail situation the same and not open it up to more trails for bikers. Please keep the current status with the trails that are open to bikes and do not open more trails to bikes, especially in the more remote areas. I feel there are plenty of bike routes in Marin where bikers can go. KEEP PT. REYES WILD. Thank you.

#838

Name: Schlachter, Margaret

Correspondence: Don't break the ranching lease contracts, that wouldn't be right. I let more knowledgeable people give their opinions on how many elks to allow so there's enough grazing for both elks and cows. I have been approached in a threatening way by bulls and I feel they need to be restricted to better secured areas and hiking trails clearly marked to go around bull pens not suddenly arriving at a gate and I see the bulls inside but the hiking trail seems to go right throw the meadow full of bulls. But my main conern is: DO KEEP THE MOUNTAIN BIKERS OUT OF THE AREA TO THE FULLEST EXTENT POSSIBLE. Thank you.

#839

Name: Colligan , Michelle

Correspondence: National parks and memorial lands belong to wildlife, not cattle who over graze anywhere they are. Ranchers do nothing to contribute to restoring the land to the condition it was before they took their livestock there. The natural balance of wildlife is crucial to the eco-system without fear of being killed off by poisons, steel & other types of traps, or shot to death. Ranchers own land for their livestock and if they practice good husbandry of their land they should be able to do so. Many ranchers own hundreds of thousands to millions of acres and do not need to use public lands. I'd like for future generations to be able to see the many species that exist in the wild and not have them go extinct.

#840

Name: Chenette, Philip

Correspondence: Pleased to hear that the National Park Service is supporting better access for bikes. Biking is an essential recreational activity with low environmental impact and we need more of it.

I support these:

A new trail between Devil's Gulch and Platform Bridge through the Cheda, McIsaac, and Zanardi Ranches. A plan to connect the Cross Marin Trail into Point Reyes. Adoption of social trails off Bolinas Ridge for better connectivity and a single-track trail experience. Extend the Olema Valley Trail to Bolinas on the east side of Highway 1. Close gaps for bikes through ranch lands in the park, including closing the Estero Trail loop, connecting Sir Francis Drake Blvd. with Pierce Point Road, and connecting Marshall Beach to Pierce Point Road, A more bike-friendly permit application process for road and mountain bike events in the park, including along Bolinas Ridge and out to the lighthouse. Bike access to all ranch roads in the pastoral zone that are already open to pedestrians.

Thanks for your work on this.

#841

Name: Forney, Maureen

Correspondence: Superintendent Point Reyes National Seashore 1 Bear Valley Road, Point Reyes Station, CA 94956.

RE: 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.

Dear Superintendent,

Great Old Broads for Wilderness is an organization conceived by older women who love wilderness. Our 8,500 members across the United States give voice to the millions of Americans who want to protect their public lands as Wilderness for this and future generations. We support the spirit and intent of national conservation legislation such as the Wilderness Act, National Environmental Policy Act and the Endangered Species Act. We believe that sound science should be a basis for informed decisions. Our more than 500 members in California have a passionate commitment to ecological preservation and restoration in our States eight bioregions. We consider Pt. Reyes National Seashore to be an extraordinary example of the best of California. Our members welcome this opportunity to submit comment on the 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.

Upon careful review, Alternative F: No Ranching and Expansion of Tule Elk in the Planning Area is in full fidelity with the position statements of Great Old Broads for Wilderness.

Our organization takes this position on Public Lands Livestock Grazing. Grazing must not be allowed to cause irreparable environmental damage to water quality, vegetation, wildlife habitat, and recreational opportunities on federal lands. Public agencies must protect the ecological health of the nations federal lands where grazing takes place. Agencies must be guided by sound scientific research to shape grazing management policies and actions. Management plans must be consistent with stated laws, regulations, and policies. Although livestock grazing is authorized under the Wilderness Act, Broads supports the eliminations of livestock grazing in designated wilderness areas and encourages voluntary permanent retirement of grazing allotments.

Furthermore, our members consider the impact of public land grazing on Soil Stomping Water and Habitat Wreckage Impeding Infrastructure Senseless Subsidies Passive Restoration

Great Old Broads for Wilderness has an adopted Climate Change position. In our position statement, these selected key points pertain to public land management, grazing and climate change - - as follows:

Public land management plans must consider and minimize the climate impacts of livestock grazing, roads and vehicular routes, recreation and other activities. Wild public lands should be prioritized for maximizing carbon storage, biodiversity, and ecological function. Natural water cycles on public lands must be rigorously protected to maintain quality, quantity, and ecosystem function. The federal government must protect and maintain water resources in trust for all citizens and for the benefit of ecosystem health and stability. Broads supports a bipartisan call to action to minimize climate change impacts, reduce fossil fuel consumption, and enhance national and global security.

In particular, it is our stance that livestock production and grazing on public lands is a significant contributor to the release of greenhouse gases. Animal production is estimated to account for 14.5% of global greenhouse gases, more than the total direct emissions from the transportation sector. Additionally, grazing damage cause desertification and disrupts and damages soils, grasslands, wetlands, and water sources, all of which store carbon. Drought and disrupted weather patterns exacerbate the injury caused by grazing. Grazing can degrade surface and

groundwater systems and ecosystem function. The agencies overseeing our public lands must prioritize protections of water resources threatened by climate change.

Finally, protected and endemic species make their home at Point Reyes National Seashore and North District of Golden Gate National Recreation Area. The Tule Elk is a flagship species found only in our State in a bare remnant of their historic range. Two of the four original North American Elk species are extinct. Tule Elk ranging helps the reestablishment of native perennial bunch grasses. Pt Reyes is also home to the subspecies of mountain beaver, with a range almost entirely within Point Reyes National Seashore. Point Reyes National Seashore and the North District of Golden Gate National Recreation Area provides essential habitat for these endemic species and a wildlife population struggling in fragmented natural landscape.

Great Old Broads for Wilderness rejects all alternatives that reduce the population of Tule Elk through any lethal means as referenced in Alternatives offered in this proposed General Management Plan Amendment. We urge decision makers, using sound science and with collaborative partnerships, to establish a robust recovery, reestablishment and viable habitat plan for Tule Elk that allows habitat connectivity for genetic diversity and species health. This plan should be in consult with California Tribal leaders to secure opportunities for cultural and historical species use. We advocate a Statewide plan to benefit Tule Elk recovery. Though this is not within the scope of this planning review, such a recovery plan for Tule Elk is promising and mitigates the limited habitat currently accessible to this protected species in fragmented habitats.

Thus, Great Old Broads for Wilderness finds that Alternative F is the best alternative in keeping with our organizational mission and environmental position statements.

However, we are fully aware of the unique characteristics of Point Reyes National Seashore and North District of Golden Gate National Recreation Area, Marin County, California. Also, there have been carefully brokered decisions, promises, compromises and founding ideals that enabled the creation of this planning area . Specific provisions of the legislation that enable Point Reyes and GGNRA authorized the issuance of lease/special use permits for agriculture, ranching and dairying purposes. Marin County has a deep history and cultural heritage of agricultural use. The North Bay Area is renowned as a region of origin for farm-to-table production, agricultural energy regeneration, organic farming and the promotion of grass-fed beef. We recognize that most of the beef cattle and dairy operations in the scope of this planning area are within the Point Reyes Peninsula Dairy Ranches Historic District and the Olema Valley Dairy Ranches Historical District.

In full consideration of the origins of Point Reyes National Seashore and North District of Golden Gate National Recreation Area, we can accept Alternative D: Reduced Ranching and Management of the Drakes Beach Tule Elk Herd with specific supplemental provisions:

Lethal management of the Drakes Beach Tule Elk Herd is not acceptable. Our recommended plan for Tule Elk is aforementioned. Any and all expansion of hiking, biking, and equestrian access in the planning area must include a migratory path protection component. In particular, bike riding, due to the speed and nature of bike riding, must be limited to avoid and mitigate any impact on wildlife. Access by hikers, bikers, and riders must not disturb wildlife access to migratory corridors, watering, resting grounds, calving/offspring raising and other animals behaviors essential to the well-being of wildlife A public educational program and appropriate signage shall be developed to provide users with information about appropriate interface of human - wildlife interaction. This is for the safety of human use of the planning area and the well-being of the animals dependent on an intact ecosystem.

Great Old Broads for Wilderness will continue to comment and participate in the EIS process for the General Management Plan Amendment, Point Reyes National Seashore and North District of Golden Gate National Recreation Area, Marin County, California.

We wish to acknowledge the robust participation of Congressman Jared Huffman in the planning and collaboration necessary for sound management and stewardship of Point Reyes National Seashore and North District of Golden Gate National Recreation Area, Marin County, California.

Respectfully submitted,

Maureen Forney San Leandro/Bear Valley California Naturalist Middle California Broadband Leader Great Old Broads for Wilderness

#842

Name: Repetti, Peter

Correspondence: I strongly support the following trail projects:

A new trail between Devil's Gulch and Platform Bridge through the Cheda, McIsaac, and Zanardi Ranches.

A plan to connect the Cross Marin Trail into Point Reyes.

Adoption of social trails off Bolinas Ridge for better connectivity and a single-track trail experience.

Extend the Olema Valley Trail to Bolinas on the east side of Highway 1.

Close gaps for bikes through ranch lands in the park, including closing the Estero Trail loop, connecting Sir Francis Drake Blvd. with Pierce Point Road, and connecting Marshall Beach to Pierce Point Road,

A more bike-friendly permit application process for road and mountain bike events in the park, including along Bolinas Ridge and out to the lighthouse.

Bike access to all ranch roads in the pastoral zone that are already open to pedestrians.

#843

Name: Hooper, John

Correspondence: My family and I are property owners in Inverness, CA, near the PRNS, and a longterm and frequent hikers and boaters on the National Seashore.

A guiding principle for the management of the PRNS must be to restore and conserve the natural character of its lands so as to leave them unimpaired for the enjoyment of future generations.

It is obvious to the most casual visitor that cattle grazing has severely degraded much of the acreage on which grazing is allowed (Ranches A,B, and C are good examples). Lease management must address this degradation and define a clear strategy and schedule toward the recovery of the natural environment.

Overall carrying capacity for cattle on the PRNS needs to be defined as well as the carrying capacity on each ranch. This exercise should include statistics showing cattle populations on each ranch by decade since the establishment of the PRNS.

The NPS must have the flexibility to modify lease terms by reducing herd sizes, excluding cattle from certain areas, prohibiting manure spreading in certain areas and requiring other Best Management Practices (eg exclusionary fencing with buffer zones from sensitive areas, rest/rotation etc) to assure rapid and measureable progress toward reversing the current state of degradation on grazing lands and protecting the ecological values

for which the PRNS was created. The strategy must include vigorous measures to rebuild soils, restore natural vegetation, protect sensitive species and protect recreational values.

A key measure of genuine restoration should include (1) the construction of exclusionary fencing from cattle and Tule Elk around springs, fens, creeks, wetlands, ponds and other freshwater features within the management areas as well as (2) seasonal testing of water quality in the above areas as well as adjacent water bodies (Abbotts Lagoon, Drakes Bay and Tomales Bay are examples) to eliminate nutrient runoff from cattle, prevent erosion, and trampling by ruminants. These freshwater features need to be identified in the study documents.

Overall carrying capacity for Tule Elk also needs to be clearly defined as well as the areas in which Elk will roam. A clear strategy for dealing with Elk populations if and when carrying capacity is reached must be agreed upon.

In the final analysis, the NPS must retain the management authority to modify lease terms, or even terminate leases, where reasonable progress toward attaining agreed upon goals to protect the natural environment are not being met.

These are our public lands and we should demand that they showcase - and provide educational opportunities for the public to understand - how excellent ranch management can complement the natural environment in which the ranches are situated.

Sincerely,

#844

Name: Mathieux, Douglas

Correspondence: The time has come to finally grant more access to bikes in Pt Reyes. I almost never ride there since there aren't great trails for proper loops. Grantings access to some limited trails will change the situation and not encroach on protected lands. Please allow the following:

- A new trail between Devil's Gulch and Platform Bridge through the Cheda, McIsaac, and Zanardi Ranches.
- A plan to connect the Cross Marin Trail into Point Reyes.
- Adoption of social trails off Bolinas Ridge for better connectivity and a single-track trail experience.
- Extend the Olema Valley Trail to Bolinas on the east side of Highway 1.
- Close gaps for bikes through ranch lands in the park, including closing the Estero Trail loop, connecting Sir Francis Drake Blvd. with Pierce Point Road, and connecting Marshall Beach to Pierce Point Road,
- A more bike-friendly permit application process for road and mountain bike events in the park, including along Bolinas Ridge and out to the lighthouse.
- Bike access to all ranch roads in the pastoral zone that are already open to pedestrians.

Thanks for giving a fair deal to polite bike riders who are also tax payers and should have closer to equal access to trails. Sincerely,

Doug Mathieuxc

#845

Name: Forer, Danny

Correspondence: I support opening more connector fireroads and trails to mtn bikes in Pt. Reyes. I am a volunteer for the Seashore (Tule Elk Docent) and a hiker, but dissapointed that you don't have more access for off road bikes.

#846

Name: Berringer, Brian

Correspondence: After a friends father who is a CHP officer was killed last year in Tahoe while riding his bike on the road, I have been more active than ever trying to push people to stay on the dirt and experience the trails. Roads are no longer a safe place to travel, please give cyclists a safe passage. No more deaths please.

#847

Name: Thaw, Steven

Correspondence: Protecting Point Reyes National Shore Wilderness prohibits all wheeled vehicles including mountain bikes for the safety of wildlife, flora, and pedestrians. Action is required by the National Park Service to walk your walk and not your bicycles. Please keep access CLOSED to bicycles. Thanks. Best, Steve Thaw

#848

Name: Fernsworth, Terry

Correspondence: I support the following:

New trail between Devil's Gulch and Platform Bridge through the Cheda, McIsaac, and Zanardi Ranches.

A plan to connect the Cross Marin Trail into Point Reyes.

Adoption of social trails off Bolinas Ridge for better connectivity and a single-track trail experience.

Extend the Olema Valley Trail to Bolinas on the east side of Highway 1.

Close gaps for bikes through ranch lands in the park, including closing the Estero Trail loop, connecting Sir Francis Drake Blvd. with Pierce Point Road, and connecting Marshall Beach to Pierce Point Road,

A more bike-friendly permit application process for road and mountain bike events in the park, including along Bolinas Ridge and out to the lighthouse.

Bike access to all ranch roads in the pastoral zone that are already open to pedestrians

#849

Name: Boitnott, Chris

Correspondence: I support the following projects:

A new trail between Devil's Gulch and Platform Bridge through the Cheda, McIsaac, and Zanardi Ranches.

A plan to connect the Cross Marin Trail into Point Reyes.

Adoption of social trails off Bolinas Ridge for better connectivity and a single-track trail experience.

Extend the Olema Valley Trail to Bolinas on the east side of Highway 1.

Close gaps for bikes through ranch lands in the park, including closing the Estero Trail loop, connecting Sir Francis Drake Blvd. with Pierce Point Road, and connecting Marshall Beach to Pierce Point Road,

A more bike-friendly permit application process for road and mountain bike events in the park, including along Bolinas Ridge and out to the lighthouse.

Bike access to all ranch roads in the pastoral zone that are already open to pedestrians.

#850

Name: Steele, Richard

Correspondence: Thank you for the opportunity to comment on the evaluation of future management practices for non-wilderness lands in the PRNS unit. I am a frequent visitor to the park, both as hiker, cyclist and sometimes (unpreferably) by automobile. I believe hiking opportunities in the park are already outstanding and well served. The non-wilderness lands at issue in the EIS are uniquely suited to expanding non-motorized bicycle use, where current cycling opportunities are woefully inadequate in such a perfect place for the activity. I have a couple of suggestions in this regard:

First, the existing Cross Marin Trail through Samuel P. Taylor and extending into the east end of PRNS should be extended so that it connects with the town of Pt. Reyes Station. The current trail ends at the intersection of Platform Bridge Road, leaving the only alternative routes by bicycle over (i) the steep, narrow and dangerous Olema hill and onto Bear Valley Road (or take your chances on Highway 1); or (ii) Platform Bridge Road and onto the extremely dangerous and frightening Petaluma-Pt Reyes Road. A gravel extension of the existing trail, paralleling Platform Bridge and Pt. Reyes-Petaluma roads would serve motorists and cyclists better by moving bikes off the busy highway, and ensure safety of cyclists.

Second, there already exist a number of "social" trails that descend from the popular Bolinas Ridge trail down to Shoreline Highway. This would improve connectivity of riding trails and enhance the cycling experience through singletrack trails (that are VERY rare in Marin county for cyclists).

Third, there are a number of gaps through various ranchlands in the northern part of the park that would be ideal for stitching together a connected set of roads and trails for cycling in the park. This would include (i) completing the circle on the Estero Trail loop, (ii) eliminating the gap between Sir Francis Drake Blvd. and Pierce Point Road (a gravel riding paradise); and (iii) allowing for a connection between the end of Pierce Point Road and the Tomales Bay at Marshall Beach.

Finally, given the popularity of cycling in Marin and surrounding counties, and among visitors from afar, it would be appreciated to have a more bike-friendly outlook by park management. For example, the winter closure to bicycles on the lighthouse road is completely unwarranted given the low impact of bicycles and their failure to contribute to any traffic or backups on the road. Also, bike access should be expanded to all of the ranch roads in the nonwilderness pastoral zone that are already open to pedestrians. There seems no valid reason, environmental, user conflict, or otherwise, to ban bicycles on these roads.

Thank you for considering these comments.

#851

Name: Komar, David

Correspondence: I am in support of the following projects:

A new trail between Devil's Gulch and Platform Bridge through the Cheda, McIsaac, and Zanardi Ranches.

A plan to connect the Cross Marin Trail into Point Reyes.

Adoption of social trails off Bolinas Ridge for better connectivity and a single-track trail experience.

Extend the Olema Valley Trail to Bolinas on the east side of Highway 1.

Close gaps for bikes through ranch lands in the park, including closing the Estero Trail loop, connecting Sir Francis Drake Blvd. with Pierce Point Road, and connecting Marshall Beach to Pierce Point Road,

A more bike-friendly permit application process for road and mountain bike events in the park, including along Bolinas Ridge and out to the lighthouse.

Bike access to all ranch roads in the pastoral zone that are already open to pedestrians.

#852

Name: N/A, N/A

Correspondence: I would like to echo MCBC's proposed projects:

new trail between Devil's Gulch and Platform Bridge through the Cheda, McIsaac, and Zanardi Ranches.

A plan to connect the Cross Marin Trail into Point Reyes. YES!! This is a much needed way to get cyclists off of the narrow and busy road to Pt Reyes.

Adoption of social trails off Bolinas Ridge for better connectivity and a single-track trail experience.

Extend the Olema Valley Trail to Bolinas on the east side of Highway 1.

Close gaps for bikes through ranch lands in the park, including closing the Estero Trail loop, connecting Sir Francis Drake Blvd. with Pierce Point Road, and connecting Marshall Beach to Pierce Point Road,

A more bike-friendly permit application process for road and mountain bike events in the park, including along Bolinas Ridge and out to the lighthouse.

Bike access to all ranch roads in the pastoral zone that are already open to pedestrians.

#853

Name: N/A, N/A

Correspondence: November 27, 2018

Dear Point Reyes National Seashore,

Herein are comments regarding the proposed General Management Plan Amendment Environmental Impact Statement (EIS) 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 grateful to PRNS staff for making management decisions using good science to keep PRNS wild.

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".

No ranching alternative. I believe the park should be managed to protect wildlife and biodiversity. Therefore, unless good science can support any continued cattle grazing, the proposed "no ranching alternative" provides the best use of our public land. Livestock grazing is not a natural process. At present, after a dry year, the outer peninsula of PRNS is shockingly overgrazed by cattle with likely some contribution from elk. The new management plan, of course, must address how to maintain and limit the cervid population to prevent overgrazing.

There are many places the public can experience cattle and livestock ranching. There are almost no places in the state of California where the public can enjoy the view of free-ranging elk. Those (Roosevelt) elk at Prairie Creek Redwoods State Park are sensational but a 6-hour drive to the north. Most of the other tule elk populations such as those found at Grizzly Island are difficult and unpredictable to see from easily accessed roads and trails.

Habitat baseline date. I took a quick look at the RDM link included with the scoping invite email. The RDM data was initiated circa 1987. Although this database is useful, the baseline for comparing livestock grazing impacts vs. reduced livestock impacts vs. no livestock impacts should be the 1970s when the park was established. The park must have benchmark photos on file that could be used to augment RDM. Benchmark photos-even from the 1940s- -have been used routinely for other federal planning processes including those at Mono Lake.

Elk management fencing. If the elk population increases, would extensive fencing be erected to control their range? This fencing is ugly and likely limits movement of other wildlife species. Yes, this is an inconsistency in my thinking.

Tricolored blackbirds. It is common knowledge that the state's tricolored blackbird population has declined precipitously. The EIS should include examination of dependency on the declining PRNS tricolored blackbird and cattle. The "trikes" seem affiliated with the ranchlands. If dairy/livestock operations are allowed to persist, did they once provide a management practice that has discontinued, which, in turn, has caused PRNS tricolored blackbirds to decline?

Protection of wetland habitats. Sensitive fen and peat habitats must be fenced from grazing by elk or cattle. In a recent issue of *Fremontia*, it states that "Marin County's Point Reyes National Seashore has a number of unusual fen-like wetlands. Ledum Swamp... has... been over-grazed and degraded and its ability to support rare plants is uncertain. Other sites include quaking peat in the paleo-dunes near Bull Point and the headwater swamp of Kehoe Creek, which is now the most southern coastal occurrence of bogbean" (Leppig, G., M. van Hattem, and W. Maslach 2018).

If "no dairy ranching" or "reduced ranching" or maintain the status quo alternatives are adopted, then ranchers must do a better job managing the ranches, allowing public access, and protecting wildlife.

(1) Management: fencing. 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 flocks - at Abbott's Lagoon. The management plan must include more grazing exposures and present a detailed monitoring measurement. Why are some grazing enclosures in disrepair (e.g. Bull Point)? Data from grazing enclosures on ranchlands versus elk-grazed Tomales Point must be presented and analyzed. The management plan must include how elk population levels would be managed. (2) Management: weed abatement.

If ranchlands are to be retired what are the long-term management plan for non-native vegetation/weed abatement?

(3) Public access. Options that preserve ranching 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. We do our best to self-police. However, I have had some uncomfortable situations. I have had ranchers warn me off from accessing areas east of Abbott's Lagoon because I was disturbing livestock, yet there was no livestock anywhere near where I was. Another time, I was walking with a friend on Sir Francis Drake Boulevard and a rancher came up and rather shrilly said to please stop disturbing the livestock. Again, I respect ranch operations, but we were on a public road heavily used by cars. It seemed inappropriate. Also, I have had friends harassed by law enforcement for presence in traditional birding areas. Regardless of the decision, I think it important that language respecting birding uses/continued public access be included as part of the management plan. Birders will continue to self-police ourselves. We all agree that privacy of residences is important.

(4) No agricultural diversification. When the plans were drawn up for the park, the intent was to preserve cattle ranching. Not sheep ranching. Not kale growing. Not beds and breakfasts. There is not an adequate water supply to support agricultural crops. All water should go to maximize salmonids and other wildlife. No retail franchise points. We don't need boutique foody stops in the park.

(5) Viewshed. I noticed some discussion of additional signage in the scoping documents. There are already many signs around the park. Signs are great, but they impact viewshed and reduce the discovery experience. If more signs are built, then some older signs should be retired.

And, as always, dogs have no place in a national park or recreation area or national seashore.

Many thanks for working on these difficult issues. I celebrate the things that work well at Point Reyes - most ranchers are friendly, wildflowers and fungus are stupendous, badgers are numerous, elephant seals are abundant, the former oyster farm is now gloriously wild, and the elk are spectacular.

– Emilie Strauss

Literature cited. Leppig, G., M. van Hattem, and W. Maslach. 2018. North Coast fens: Biodiversity Hotspots of Great Botanical Richness. *Fremontia* 46 (2): 14-29.

#854

Name: Bakaley, Steve

Correspondence: I have hiked all over Point Reyes since 1982. I'm familiar with most of the trails. Most of the single track trails are fragile, eroded, and have poor line of sight. Opening single tracks to mountain bikes invites severe trail damage and a huge safety liability for the park. The park gets a lot of equestrian use. I've seen what happens when horses encounter mountain bikes and it's not pretty. It threatens wildlife especially in sensitive areas. Marin mountain bikers are among the most belligerent of the lot. They notoriously build bootleg trails and create berms for jumping.

I have no objection to their use of fire roads. They already HAVE access to most of them. Historically hikers abandon single tracks taken over by mountain bikers because they lose the tranquility they seek having to continually look over their shoulder because a mountain biker may, and probably will, come barreling down on them. Hearing impaired are particularly at risk because they may not hear the sounds of crashing brush around the corner or from behind.

#855

Name: N/A, N/A

Correspondence: I am very much OPPOSED to granting Mountain Bikers more access to Point Reyes Wilderness Land. My major concern are safety reasons, accidents to hikers and other bikers, as well as noise and air pollution.

#856

Name: Phinney, Paige

Correspondence: I am submitting this comment in alignment with others in the community. Some of this language may be repetitive with other submissions you have seen - but I wanted to reiterate that I am in alignment with this perspective. Thank you. _____

The GMPA EIS team should choose the Community Alternative as the preferred alternative. It is the only alternative that would allow all ranchers to continue their family heritage and would preserve the working landscapes the park service is charged to protect. The alternative: THE COMMUNITY ALTERNATIVE: CONTINUED RANCHING AND MANAGE ELK FOR EFFECTIVE SEPARATION FROM RANCHES Based on the purpose and need for action, the Community proposed action includes the following elements: Issue agricultural lease/permits with 20-year terms to existing ranch families to continue beef and dairy operations on approximately 27,000 acres within the planning area. 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. Explore opportunities for ranch operational flexibility and diversification, establish up to approximately 900 acres of collaboratively managed resource protection buffers, and provide a programmatic review and approval process for operational flexibility, diversification and best management practices. Manage Tule elk for effective separation from ranches. No elk herds would be allowed to establish in the ranching area. The NPS would implement a strategy prioritizing maintenance of historic buildings on ranches in collaboration with seashore ranchers. Prioritization would take into account historic preservation goals and the needs of ranch operations. In some cases, adaptive reuse of historic buildings would be considered to support diversification activities. NPS would collaborate with ranchers to implement strategies to remove non-native, invasive plants and to manage special status plants. Strategies for the management of historic ranch complexes within the planning area but not part of current ranch operations would be identified including: restoring diversified agricultural use, prioritization of specific buildings, structures, and landscapes for preservation based on their importance to the overall integrity of the historic districts and opportunities for adaptive reuse. As appropriate, the seashore would evaluate potential for decommissioning/deconstruction of low priority or substantially degraded structures/ complexes as part of this plan. The Proposed Community Action Alternative should be considered during the EIS process. Elk are new to the ranching areas and therefore should not be included in the 150 year environmental baseline. The adverse impacts of introduced elk to the permitted ranching should be evaluated in this EIS to update the 1998 Elk Environmental Assessment and Elk Management Plan. The park service should issue 20 year rolling leases to the ranchers - every year the 20-year lease automatically renews. This gives the ranchers and the public 20 years notice if ranching is to be discontinued at PRNS. This agreement would be similar to the Williamson Act agreements. Keep annual compliance meetings between ranchers and PRNS, and keep the NPS 30 day cancellation clause for non-compliance to protect the NPS and public. Advantages of the 20-year rolling leases include: With more security ranchers would take better care of the cultural and natural resources Allows for planning Save NPS time & money Gives next generation ranchers hope for the future Shows a commitment by the Department of the Interior that ranching will continue The park service generally has limited agricultural experience. Park service staff responsible for working with ranchers turn over regularly. No experience, no continuity and regular turn over creates many problems. Ranchers are the only land stewards with institutional knowledge of the resources and are constantly educating new PRNS staff about ranching and dairying. This EIS must evaluate the advantages of creating an Agricultural Advisory Committee. This Ag Advisory Committee could include a member from each of these highly qualified agencies: The USDA Natural Resources Conservation Service, The Marin County Resource Conservation District, The Marin County Agricultural Commissioner, The

University of California Cooperative Extension Service, Marin Agricultural Land Trust and Marin County Farm Bureau. This committee should be consulted and should advise PRNS decision makers any time an agricultural question of issue arises. The advantages of using this committee include: Agreements would not be forgotten or overturned Local, regional, state and federal agricultural expertise could be included in decision-making Local, regional, state and federal resource conservation experts would be included in decision-making The local community could be included in decision-making Management of the working lands would not be crippled by turnover of key PRNS staff Individuals with long-term knowledge of the seashore ranches and dairies would be involved in decision-making The Park Service should encourage operational flexibility for the ranchers – including the implementation of best management practices (BMP) including; brush control, weed control, stocking density, water system improvements, fencing and other practices that have been shown to improve rangeland condition and sequester atmospheric carbon in rangeland soils. BMP implementation: Encourages good stewardship Quick decision-making can help ranches remain viable Allow ranchers to make ranching decisions to preserve pastures and buildings Helps to preserve the working landscape for future generations Better for the natural resources Should be allowed on pasture land and rangeland Ranchers who have made silage in the past should be allowed to continue silage production and it should be allowed for other ranchers when requested. Reduces import of feed that could contain weed seeds Portrays to the public the actual historic use at Pt. Reyes. Important range management practice to control weeds Helps balance nutrients at the landscape scale Ranchers should be allowed and encouraged by the Park Service to diversify their ranching activities to include small-scale historic plant and animal production. More properly represents the important historic period (1860-1960) Park Service is entrusted to protect. Adds interest for next generation ranchers Connects the seashore ranchers to the local food system Breaks up the existing cow monoculture making it more interesting, educational and historically accurate for the visiting public Should be allowed on pasture land and rangeland Grazing success and compliance should be measured by resource goals. The goals could include residual dry matter that remains at the end of the grazing season, plant community species composition, plant density, etc. The rancher should be allowed to choose stocking density and stocking rates to meet these goals. There should not be pre-set maximum number of cows. Ranches have the most experience To meet the resource goals, ranchers need to be flexible Forage production varies annually with weather Stocking rates should be flexible to match forage production Maximums set too low can lead to resource degradation including invasive weed and brush proliferation, loss of photosynthetic potential, loss of soil carbon and wildfire fuel loading. Pre-setting of maximum cow numbers removes the ranchers' incentive to manage for improved forage production, including practices that are known to address invasive weeds or sequester atmospheric carbon in rangeland soils. Ranchers should be allowed to process and sell their farm products at the seashore Improve visitor experience More closely demonstrates the historic use of Pt. Reyes. Re-connects the seashore ranchers with the local food community Offers more opportunity to next generation ranchers Is allowed in the Marin Local Coastal Plan Ranchers should be allowed to add farm worker housing There is little affordable housing in West Marin Reduces traffic Historically accurate Difficult for ranchers to interest employees without housing Is allowed in the Marin Local Coastal Plan Elk should be managed per Congressman Huffman's direction in H.R. 6687 that "in areas of agricultural property where Tule Elk present conflicts with working ranches or dairies, the Secretary shall manage the Tule Elk for separation from the working ranches or dairies." Conflicts caused by the elk with existing ranches and dairies include the spread of disease and associated environmental impacts. Both the elk and the cattle can be harmed by disease transfer The elk are damaging ranchers' property and hurting their businesses both in the Drakes Beach area and the Drakes Estero trail areas. The Drakes Beach herd is not the only herd harming the family ranches. The elk have plenty of room at Limantour and Tomales Point with plenty of visitor access The elk are newly introduced and are not part of the historic character meant to be protected in the pastoral zone. Elk should remain and be protected in wilderness areas. The elk were relocated to the designated elk range in the Limantour wilderness; the Park Service should keep them there and manage that area for elk habitat. Elk within the ranching area are hazed by PRNS staff daily. This is expensive, ineffective and it treats a wild animal as if it is a domestic animal. Elk should be kept in the wilderness areas so they can be free ranging without constant human interference.

#857

Name: N/A, N/A

Correspondence: Would love to see more trail opportunities that focus on loop routes, connectivity with adjacent public lands, and facilitation of north-south connectivity across the landscape. Some specific examples:

A new trail between Devil's Gulch and Platform Bridge through the Cheda, McIsaac, and Zanardi Ranches.

A plan to connect the Cross Marin Trail into Point Reyes.

Adoption of social trails off Bolinas Ridge for better connectivity and a single-track trail experience.

Extend the Olema Valley Trail to Bolinas on the east side of Highway 1.

Close gaps for bikes through ranch lands in the park, including closing the Estero Trail loop, connecting Sir Francis Drake Blvd. with Pierce Point Road, and connecting Marshall Beach to Pierce Point Road,

A more bike-friendly permit application process for road and mountain bike events in the park, including along Bolinas Ridge and out to the lighthouse.

Bike access to all ranch roads in the pastoral zone that are already open to pedestrians.

#858

Name: Creque, Jeffrey

Correspondence: November 29, 2018 Superintendent Cicely Muldoon Point Reyes GMP Amendment EIS Point Reyes National Seashore 1 Bear Valley Road Point Reyes Station, CA 94956 Subject: Comment on the Point Reyes National Seashore General Management Plan Amendment Environmental Impact Statement Scoping Process

Dear Superintendent Muldoon;

The Carbon Cycle Institutes mission is to stop and reverse climate change by advancing natural science-based solutions that remove excess atmospheric greenhouse gases while promoting environmental stewardship, social equity and economic sustainability. CCI appreciates the opportunity to comment during the formal scoping phase of the Environmental Impact Statement (EIS) for the Point Reyes National Seashore (PRNS) and Golden Gate National Recreation Area north district (GGNRA) General Management Plan Amendment (GMP Amendment).

There has always been, and remains, an enormous opportunity at PRNS/GGNRA to achieve a uniquely powerful synergy between NPS resource management goals and agriculture. The GMP Amendment presents an opportunity for NPS, working with the few remaining PRNS/GGNRA ranchers and the Point Reyes Seashore Ranchers Association (PRSRA), whose families have managed the land for generations, to provide a national example of collaborative engagement to safeguard -and enhance- natural resources, including the working landscape within the Seashore. To succeed, this process must engage both agriculture and NPS in a creative, adaptive ecological and agroecological approach to resource management both within and beyond the Pastoral Zone.

The three settlement-required alternatives represent an existential threat to Marin agriculture and significant risk to agriculture regionally; they must be rejected. PRNS dairies represent 20% of dairies in Marin County and 20% of the milk provided to local processors. Losing these dairies, as would occur under the No Dairy Ranching alternative, would eliminate an irreplaceable source of milk for the Marin-Sonoma milkshed, and would compromise the cultural ecology and economy of both counties. For these and other reasons discussed below, we fully support the continuation of ranching, dairy production and agriculture generally in PRNS/GGNRA; unfortunately, however, none of the Proposed Alternatives adequately support that outcome. 2 Of the proposed alternatives, Proposed Alternative C: Continued Ranching and Removal of the Drakes Beach Tule Elk Herd

appears to support continuation of agriculture at PRNS/GGNRA, however, it fails to address the need to remove elk from the pastoral zone entirely, including the Drakes Estero trail area, and thus directly threatens the continuation of agriculture in the Seashore. None of the proposed alternatives includes the restoration of ranching activities where agriculture has been lost from the Pastoral Zone due to PRNS/GGNRA administrative actions. In short, the suite of proposed alternatives are all biased against the continuation of agriculture at PRNS/GGNRA. We therefore support a Community Alternative that offers a strategy for collaborative conservation and incorporates language from Congressman Huffmans legislative report for H.R. 6687:

Community Alternative: Continued Ranching and Management of Elk for Effective Separation From Ranches Based on the purpose and need for action, the Community Alternative includes the following elements: " Issue agricultural leases/permits with rolling 20-year terms to existing ranch families to continue beef and dairy and associated agricultural operations on approximately 27,000 acres within the planning area. " Explore opportunities for ranch operational flexibility and diversification, establish up to 900 acres of collaboratively-managed resource protection buffers, and provide a programmatic review and approval process for operational flexibility, diversification and best management practices, including climate-beneficial practices (in collaboration with an agricultural advisory committee, discussed below). " Manage Tule elk for effective separation from ranches. No elk herds would be allowed to establish in the planning area. " The NPS would prioritize maintenance of historic buildings on ranches in collaboration with seashore ranchers. Prioritization would take into account historic preservation goals and the needs of ongoing ranch operations. In some cases, adaptive reuse of historic buildings would be considered to support diversification activities. " NPS would implement strategies, in collaboration with seashore ranchers, to remove non-native, invasive plants and to manage special status plants in the planning area, while implementing practices to optimize agroecosystem carbon sequestration. " Strategies for the management of historic ranch complexes within the planning area but not part of currently active ranch operations would be identified including: restoring diversified agricultural use, prioritization of specific buildings, structures, and landscapes for preservation based on their importance to the overall integrity of the historic district and opportunities for adaptive reuse. As appropriate, the seashore would evaluate the potential for decommissioning/ deconstruction of low priority or substantially degraded structures/complexes as part of this plan.

Sustainable Agriculture and Climate Change The PRNS/GGNRA ranchers are dedicated to environmental stewardship through working landscape management, including a growing interest in implementation of agricultural solutions for climate change. The Marin Resource Conservation District (RCD) has been working since 2013 to develop and implement whole-farm conservation plans quantifying the potential of the farm landscape to sequester atmospheric GHG. Realizing the potential for carbon sequestration in PRNS Pastoral Zone soils and vegetation could help move PRNS/GGNRA beyond carbon neutral to carbon negative through implementation of practices verified on Marin rangelands by the Marin Carbon Project (MCP) (Ryals and Silver 2013, DeLonge et al 2013) and promoted by numerous regional, state and national organizations, including the Marin RCD, the Marin Agricultural Land Trust (MALT), California Department of Food and Agriculture (CDFA), USDA-Natural Resources Conservation Service (NRCS) and CCI. These practices not only result in persistent ecosystem carbon increases, but offer enhanced resilience to both working and natural landscapes in the face of increasingly extreme weather events, including both winter storms and drought (Flint et al 2018).

CCI has worked closely with the Counties of Sonoma and Marin, the Marin RCD and the MCP to develop agricultural elements for local County Climate Action Plans (CAP) in response to California Assembly Bill 32. The Marin and Sonoma CAPs explicitly recognize the potential for the agricultural landscape to be a net carbon sink and to provide offsets that make significant contributions toward achieving CAP GHG emission reductions objectives through implementation of on-farm conservation practices. To this end, the Marin County Board of Supervisors recently adopted the Drawdown: Marin goal, engaging both local agricultural production and terrestrial carbon sequestration in the Countys overall climate change mitigation efforts.

The GMP Amendment should include an analysis of GHG reduction strategies (particularly carbon sequestering conservation practices) that can be implemented at the farm/ranch scale at PRNS/GGNRA to help meet County, State and PRNS/GGNRA objectives for reducing atmospheric greenhouse gases (GHG), consistent with the NPS

Climate Friendly Parks program (<https://www.nps.gov/subjects/climatechange/cfpprogram.htm>). PRSRA members should be encouraged to implement carbon beneficial practices, including on-farm renewable energy generation, and to aggregate the carbon benefits realized for economic return and/or to facilitate PRNS in meeting its GHG reduction goals. In addition, PRNS/GGNRA-generated organic wastes, including food waste and landscape debris, should be composted and the resulting material utilized in soil and landscape restoration projects within the Seashore, including the Pastoral Zone. Diversion of organics from anaerobic disposal to aerobic composting provides GHG benefits through both emissions avoided through diversion from disposal and soil carbon sequestration at the point of use (DeLonge et al 2013).

Leases Lease length is directly related to the strength and viability of farming and ranching operations. Longer leases promote long-term stewardship and viability of agricultural enterprises, enabling investments in and maintenance of infrastructure, natural resources, and farm employee welfare. Twenty-year leases -promised by Interior Secretary Salazar in 2014 yet still not delivered - would be a good first step, but NPS should augment those 20-year leases with rolling annual renewals, so that every year, assuming ranching family compliance with lease terms, leases are extended for another 20 years. This will provide ranchers the long-term equity and stability needed to support infrastructure upkeep, resource enhancement, a skilled and well-paid farm workforce, access to federal cost share programs and other natural resource enhancement and financing opportunities.

Importantly, operational resilience is constrained if agricultural activities are limited to only beef and dairy operations. In order to encourage a sustainable combination of agricultural land uses, production of a diversity of food and fiber crops should be permitted. Lessees should be supported in the continued adoption of ecologically sustainable farming approaches, including organic and climate beneficial practices, with NPS incentives to do so. Expansion of options for agricultural operations, including on-farm value-added opportunities, is key to maintaining operational flexibility and should be encouraged.

Agricultural leases could be structured as Stewardship Contracts¹, similar to US Forest Service and US Bureau of Land Management models (http://www.pinchot.org/gp/Stewardship_Contracting), allowing reduced lease rates for enhanced stewardship activities on the part of ranches, individually or collectively, by establishing resource enhancement goals above and beyond regular lease agreements, including terrestrial carbon sequestration goals.

Tule Elk The PRNS 1998 Tule Elk Management Plan/EA envisions a PRNS free-ranging herd of 250-350 elk, and does not include expansion of the elk herd into the Pastoral Zone. Failure by NPS to manage this introduced herd in accordance with its own elk management plan does not change the legitimate environmental baseline of the proposed EIS, which must not include the presence of elk in the Pastoral Zone. Elk have killed dairy heifers in the Pastoral Zone, consumed forage to the point of compromising the ability of certified organic producers to meet their pasturage requirements and for other producers to meet PRNS residual dry matter (RDM) requirements, forced ranchers to purchase expensive supplemental forage, consumed limited water, repeatedly broken

5 fences, and continue to increase in numbers in the Pastoral Zone. While Tule elk were considered endangered when introduced to Pierce Point in 1978, they are not so considered today, with herds growing in size in multiple locations around the state (State of California Natural Resources Agency Department of Fish and Wildlife Draft Elk Conservation).

PRNS elk were known to carry Johnes disease, transmissible to cattle, at the time of release from their Pierce Point enclosure. This release took place despite the explicit recommendation that elk not be released where contact with livestock could occur (Cook et al 1997). Given elk populations in PRNS are not limited by any significant predator pressure, already exceed PRNS estimated carrying capacity for elk, and now reside within the Pastoral Zone in numbers high enough to have a serious detrimental economic and ecological impact on the ranches there, reducing and controlling the PRNS Tule elk population is an immediate necessity. As a first step, all elk should be removed from the Pastoral Zone. Remaining elk within the wilderness areas should be managed to maintain populations within the carrying capacity of those lands, in order to reduce inevitable migration pressure onto the Pastoral Zone. Control via off-site transfers, contraception, and limited but consistent hunting pressure should all be deployed as appropriate.

The conflict between free-ranging Tule elk and the ranches at PRNS will continue to increase absent meaningful management intervention. Over the past two decades, ranchers and the public have repeatedly raised concerns related to Tule elk, their impact on ranch operations and the incompatibility of a free-ranging elk herd and agriculture. The failure of PRNS to follow its own 1998 Tule Elk Management Plan, among numerous other missteps on the part of NPS and PRNS administrations, has created both a serious threat to the survival of ranching in the Pastoral Zone and a serious credibility gap between the PRNS planning and implementation processes. If survival of the ranches within the Pastoral Zone is a genuine Department of Interior management objective, as suggested by the Secretary's 2014 declaration, then exclusion of elk -including the Drakes Beach and Estero Trail herds- from the Pastoral Zone is the only viable management objective.

Because PRNS has neither the land base nor the predator population to support an unmanaged free-ranging herd of Tule elk, with or without the PRNS ranches, population control and other NPS management interventions are needed to avoid elk damage to PRNS natural resources and extreme elk population fluctuations, including mass die-off events under low resource conditions, as occurred during the recent drought. Elk population management should be initiated sooner rather than later, and the Drakes Bay and Estero Trail elk herds should be eliminated to both avoid further damage to agriculture in the Pastoral Zone and provide some buffering capacity for the inevitable periodic population fluctuations that may drive future elk incursions into the Pastoral Zone (State of California Natural Resources Agency Department of Fish and Wildlife Draft Elk Conservation and Management Plan, 2017).

6 Visitor Access and Experience We support the concept of increasing the hiking trail network in the planning area as long as visitor safety and management needs of the affected ranches are respected. Trail locations should be determined in close collaboration with ranch operators to insure a trail system that is workable for both land managers and visitors. Trailheads and points along the route should include discrete signage with relevant cultural, historical, and ecological interpretive information, as well as safety and ranch gate etiquette protocols. PRNS visitor experience would thus be expanded through explicit access to portions of the Pastoral Zone, along with the opportunity to learn about PRNS agriculture, the cultural ecology of the Seashore, its history, and the ranching families that continue multi-generational stewardship of the PRNS Pastoral Zone.

Cultural and Historic Resources The PRNS/GGNRA ranches have contributed to maintaining the ecological richness of the Point Reyes landscape and continue as an important element in maintaining the iconic landscape mosaic of west Marin County. PRNS/GGNRA are unique among national park units in the potential for integration of an actively managed pastoral landscape with large areas of that landscape that have been allowed - whether wisely or not- to follow a course of unmanaged ecological succession following cessation of pre-historic anthropogenic disturbance regimes and historical agricultural use. Though not directly applicable to PRNS/GGNRA, Cuyahoga National Park provides a working example of the successful integration of agriculture and NPS resource management objectives.

PRNS should focus on the implementation of appropriate agricultural practices as a means to enhance the cultural ecology of the Pastoral Zone and PRNS/GGNRA generally. Such an approach would seek to maximize protection of both natural and cultural resources and support continuation of a working landscape that is both ecologically and economically sustainable, reflecting its continuing evolution over the 200 years since the genocidal destruction of the indigenous cultural ecology of the region. This would both support continued ranching and farming on historically agricultural areas, and provide a context for renewed leasing of ranches that have gone out of production but which still have the infrastructure to support an active agricultural operation (including D Ranch and Wilkins Ranch). This process should include an evaluation of the potential for use of agricultural practices, including livestock grazing, to achieve PRNS/GGNRA management objectives both within and beyond the boundaries of the Pastoral Zone. BMPs should be used to move beyond resource protection to enhancing cultural and ecological resilience, particularly in the context of accelerating anthropogenic climate destabilization and the increasing threat of catastrophic wildfire across California, particularly at the wildland-urban interface.

Rangeland and agricultural management plans should be co-developed among the lessees, NRCS, RCD, CAL FIRE and NPS staff in an adaptive management approach to link agriculture and pastoralism to ecological

stewardship, restoration and climate change resilience and mitigation. This approach builds on a growing movement of conservation scholars and practitioners, including those within NPS, to provide leadership in exploring integrated approaches to landscape stewardship at a time of unprecedented global change. See: "Speaking for the Future: A Dialogue on Conservation," Jan. 2003, <http://www.nps.gov/mabi/csi/new/speaking.htm> and *The Future of Working Cultural Landscapes: Parks, Partners, and Local Products*, 2008, [http://www.nps.gov/csi/pdf/Working Cultural Landscapes Report Full.pdf](http://www.nps.gov/csi/pdf/Working_Cultural_Landscapes_Report_Full.pdf)

This approach also provides synergistic support for efforts underway in Marin County to enhance and strengthen its sustainable agricultural community, including the work of Marins Agricultural Commissioner, MALT, the Marin RCD, UC Cooperative Extension and the Marin Carbon Project. By taking this approach, rather than one that conceptualizes natural and cultural resources as existing in inherent conflict, PRNS has the opportunity to become a model for natural resource management around the nation.

Agricultural Advisory Committee The EIS should evaluate creation of an Agricultural Advisory Committee to inform and support NPS with respect to agricultural issues in the planning area. The Committee should include representatives from the NRCS, Marin RCD, Marin County Agricultural Commissioners office, University of California Cooperative Extension, MALT, Marin County Farm Bureau, the PRNS dairy ranchers and PRNS beef ranchers. This concept is consistent with NPS policies supporting local community involvement and with the UNESCO principles for World Heritage Site cultural landscapes.

World Heritage Site Status The Point Reyes and Olema Valley Historic Ranch Districts, located within Point Reyes National Seashore, have recently been listed on the National Register of Historic Places. This EIS should evaluate NPS nomination of these historic Ranch Districts for World Heritage Site status. Such status would further the plan objective of preserving ranching and farming in the project area in perpetuity. In the meantime, with Cuyahoga as precedent, NPS should manage the lands consistent with World Heritage Site principles for managing Continuing Cultural Landscapes.

Community and Agricultural Economy Agriculture on the PRNS/GGNRA lands represents roughly 20% of both the area and total agricultural production in Marin County, with a 2016 gross value of \$18.3M. Multiplier effects, through processing and value-added production, result in an estimated annual value of over \$73M. These significant community benefits should be recognized in the GMP Amendment. The loss of this component of the county's agriculture, and over 1,000 on-farm and farm-related jobs, following on the heels of the gratuitous, tragic and arguably illegal NPS elimination of 55% of California's sustainable shellfish aquaculture capacity in Drakes Estero, would be severely detrimental to the community and the region and would further undermine NPS's already damaged credibility as a community partner.

8 Conclusion The PRNS/GGNRA management framework must recognize the potentially potent role of agriculture and the natural resources -including human resources- it embodies in facilitating and informing NPS's broad resource management objectives. Ranching and farming offer tools, including the use of livestock, to enhance wildlife habitat both within and outside the Pastoral Zone, while helping to advance both broader and more specific vegetation management objectives -such as fire fuel reduction and plant community species composition- both within and outside the planning area. The potential interpretive and educational opportunities such an integrated process presents are innumerable. For such an effort to succeed, however, requires PRNS/GGNRA to add upper-level staff with advanced training and experience in both Agricultural Ecology and Cultural Ecology, with capacity and authority to guide and implement a fully integrated approach to natural resource planning and adaptive management. This effort must be engaged in full collaboration with Seashore agriculturalists and the region's natural resource and agricultural agencies, including NRCS, MRCD, UCCE, Marins Agricultural Commission, and MALT.

At a minimum, the GMP amendment for the Ranches and Pastoral Zone of PRNS/GGNRA must address: 1) the role of sustainable agriculture in the cultural ecology of PRNS and the region; 2) the role of local, sustainable agriculture in regional and national food security, and climate change resilience; 3) the potential beneficial role of PRNS and its ranches and ranching community in climate change mitigation; 4) the management of the PRNS elk

herd both inside and outside the Pastoral Zone; 5) the nexus and potential nexus between agricultural practices and NPS resource management objectives at PRNS, including Climate Friendly Parks and the possibility of expanded livestock grazing within the Seashore under a targeted grazing management scenario to meet PRNS vegetation management objectives (including fuel management and elk habitat improvement outside the Pastoral Zone). We propose carrying out these activities under a Stewardship Contract agreement framework per USFS/USBLM models.

Over half a century ago, Marin agricultural community joined with local and national environmentalists and the NPS to realize the shared goal of protecting this unique landscape from urban development. The success of this shared effort is manifest in today's working landscape with its strong community, economic, and ecological benefits. Because of this historic alliance, the opportunity for a vibrant local cultural ecology, including provision of climate change solutions, sustainable food production and functional landscapes, among other ecosystem services and values, remains.

Today, we stand at a time of unprecedented challenge to our planet and to ourselves as an exceptionally powerful biotic factor (Tansley 1935). The GMP Amendment process is an opportunity to again embrace the original purpose and intent of PRNS/GGNRA; the preservation of this unique working landscape, including its multi-generational ranching families and the regional cultural ecology of which they are a defining component, as a living, working, dynamic cultural ecosystem.

Sincerely, Jeffrey Creque, Ph.D. Director of Rangeland and Agroecosystem Management Carbon Cycle Institute
CA State Board of Forestry Certified Rangeland Manager

Literature Cited Cook, W.E., Cornish, T.E., Shideler, S., Lasley, B., and Collins, M.T. 1997. Radiometric culture of *Mycobacterium avium* paratuberculosis from the feces of tule elk. *J of Wildlife Diseases*, 33(3): 635-637. Delonge, M.S.; Ryals, R. and Silver, W.L. 2013. A Lifecycle Model to Evaluate Carbon Sequestration Potential and Greenhouse Gas Dynamics of Managed Grasslands. *Ecosystems* 16: 962-979. Flint, L.E., Flint, A.L., Stern, M.A., Myer, A., Silver, W., Casey, C.F., Franco, F., Byrd, K., Sleeter, B., Alvarez, P., Creque, J., Estrada, T., Cameron, D., 2018. Increasing soil organic carbon to mitigate greenhouse gases and increase climate resiliency for California. A report for California's Fourth Climate Change Assessment. California Natural Resources Agency. August 2018. CCCA4-CNRA-2018-006. Ryals, R. and Silver, W. 2013. Effects of organic matter amendments on net primary productivity and greenhouse gas emissions in annual grasslands. *Ecological Applications* 23(1): 46-59. Tansley, A. G. 1935. The Use and Abuse of Vegetational Concepts and Terms. *Ecology*, 16(3): 284-307.

#859

Name: N/A, N/A

Correspondence: Please keep the use of trails as is. Horses and hikers just don't mix well with bikers.

#860

Name: REYNOLDS, DAN

Correspondence: I would like to see some multi use trails that allow bikes.

#861

Name: N/A, N/A

Correspondence: Please provide the following:

A new trail between Devil's Gulch and Platform Bridge through Cheda, McIsaac and Zanardi Ranch. A plan to connect the Cross Marin Trail into Point Reyes. Adoption of social trails off Bolinas Ridge for better connectivity and a single-track trail experience. Extend the Olema Valley Trail to Bolinas on the east side of Highway 1. Close gaps for bikes through ranch lands in the park, including closing the Estero Trail loop, connecting Sir Francis

Drake Blvd. with Pierce Point Road and connecting Marshall Beach to Pierce Point Road, A more bike-friendly permit application process for road and mountain bike events in the park, including along Bolinas Ridge and out to the lighthouse. Bike access to all ranch roads in the pastoral zone that are already open to pedestrians.

#862

Name: Nielson, Christine

Correspondence: I am strongly opposed to expanding mountain biking access to any areas of the Pt. Reyes National Seashore that allows them to ride in, on or through wild areas of the Park.

Permitting greater access to ranch roads or other dirt roads that have vehicle traffic already doesn't present any conflict of use that I can imagine.

Allowing them to ride on hiking trails currently off-limits to them is fraught with potential problems as they are generally not considerate of walkers, much less horses, and unless there are strict rules...and ways to enforce them.... governing times and/or days of use, permitting this is opening a can of worms.

I live in Helena, MT during the summer months and there is a huge battle currently going on between mountain bikers and hikers/riders over this exact issue. Once they begin to ride in a place, they claim it and then restricting use is extremely difficult.

#863

Name: hauswald, vanessa

Correspondence: I am in full and enthusiastic support of the new trail opportunities that focus on mountain bike access to loop routes, connectivity with adjacent public lands, and facilitation of north-south connectivity across the landscape. I love the idea of the potential routes that primarily use abandoned or administrative roads (including ranching roads). We will be out in force with volunteers for all trail work days, as needed! Thank you for your commitment to equal access for bicycles!

#864

Name: Wimpfheimer, David

Correspondence: Thank you for the opportunity to comment on the General Management Plan Amendment.

As a background, I have lived in West Marin since 1980. In the last thirty 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. In short, I have a detailed knowledge of wildlife in the Seashore and the diverse natural history at Point Reyes.

I have reviewed the GMP Amendments and these comments refer directly to those documents.

The enabling legislation that created Point Reyes National Seashore in 1962 seemed to indicate 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 has been a compromise in the national seashore; there is some ranching, but there is also mostly protection of the natural resources. In brief, I am in favor of continuing that compromise, but I would like to see more protections of wetlands and other natural resources.

When a family is no longer using its lease as in the D Ranch I advocate the termination of all grazing in those areas. I would favor the full protection of all wildlife, including Tule Elk, in these areas. This is consistent with the National Park Service Organic Act of 1916: "purpose and intent 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"

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. Damage to the soil, the natural vegetation, and the wetlands on "grazing lands" within the Seashore is readily apparent. It is imperative that these impacts be documented and then reduced.

These impacts are especially evident near Ranches A, B, and C where the landscape is obviously so degraded that its natural values have been nearly eliminated. Only strict land management practices that limit the intensive impacts of ungulates can reverse the severe degradation that these lands continue to suffer.

Specifically, I am concerned about three management issues; the number of elk, diversification, wetlands protection and the length of the ranching leases.

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.

Diversification Diversification is an inherently confusing term that needs to be defined so that the public understands that it could bring a dramatic shift of commercial land use within the Seashore.

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.

Wetlands Protection A priority of the NPS should be to reverse degradation and to protect and enhance the natural values of all wetlands within PRNS. The condition of many wetlands and marshes has been compromised by trampling, intensive grazing, and excessive nutrient (nitrogenous waste) runoff. Exclusionary fencing of wetlands (and potential wetlands) including 100-meter buffer zones to eliminate impacts by cattle and elk should be a management priority in an attempt to restore the integrity of these valuable resources.

Ranching Lease Periods In most of the alternatives or concepts presented at the two meetings in Point Reyes Station and Sausalito the NPS used 20-year leases for the various ranches. I am not opposed to that length of lease. However, I feel there must be exact conditions outlined that ranchers must fulfill otherwise that lease period may

be reduced or ended. There should be strict guidelines as to the acceptable number of livestock and how the natural resources can best be protected. Ranchers should be held accountable for adhering to these best management practices.

Thank you for entering my views into your record.

#865

Name: Lounsbury, Bart

Correspondence: As a former park ranger at Point Reyes National Seashore and still a resident of the Bay Area, I strongly support increased mountain bike access at Point Reyes National Seashore. I enjoyed the few trails that were open to bikes 20 years ago when I was a ranger, but they were few and far between. I am certain that better mountain bike access could be granted without creating user or natural resource conflicts, particularly given the already human-disturbed nature of much of the area.

Thank you for your consideration.

#866

Name: heckaman, adam

Correspondence: Hello folks,

I am an avid Bicycle rider hailing from Larkspur california. I traditionally ride mountain bikes because it scars the heck out of me to ride on roads. It would be incredible to open up the trails within Pt Reyes for more adventuring and exploring.

Thanks for your time and - I would even volunteer to build any trails you need assistance with!

- Adam

#867

Name: N/A, Steve

Correspondence: Hello,

I'm writing to support Mountain Biking on public lands in Marin county. I'm a Bay Area native that hasn't spent much time on public lands in Marin because of the restrictions on mountain biking. My family travels for mountain biking vacations twice a year. Those dollars are taken to destinations that are mountain bike friendly.

It's sad that my family leaves one of the most beautiful places on the planet because of unnecessary access restrictions to public land. I've been a "Mountain Biker" for more than thirty years and have enjoyed public lands via Mountain biking in more areas than in my backyard, the SF Bay Area. I'm a working professional just like many other trail users. My tax dollars go to public lands and I deserve the same rights and access as every user group. I will walk on trails, but my soul is into exploring trails on my bike.

Please support Mountain Bike access on all public lands and the following before you today:

A new trail between Devil's Gulch and Platform Bridge through the Cheda, McIsaac, and Zanardi Ranches. A plan to connect the Cross Marin Trail into Point Reyes. Adoption of social trails off Bolinas Ridge for better connectivity and a single-track trail experience. Extend the Olema Valley Trail to Bolinas on the east side of Highway 1. Close gaps for bikes through ranch lands in the park, including closing the Estero Trail loop, connecting Sir Francis Drake Blvd. with Pierce Point Road, and connecting Marshall Beach to Pierce Point Road, A more bike-friendly permit application process for road and mountain bike events in the park, including along

Bolinas Ridge and out to the lighthouse. Bike access to all ranch roads in the pastoral zone that are already open to pedestrians.

Thank you

#868

Name: N/A, N/A

Correspondence: I support and encourage better connectivity and safety for bicyclists in and around Pt. Reyes National Seashore. I would like to see more trails at Pt. Reyes open to bikes. Specifically, I also want to support: 1) A new trail between Devil's Gulch and Platform Bridge; 2) A trail connecting Pt. Reyes with the Cross Marin Trail; 3) Adoption of social trails off Bolinas Ridge for better connectivity and a single track trail experience; 4) Extending the Olema Valley Trail to Bolinas on the east side of Hwy 101; 5) Closing the gaps for bike use and access through ranches that currently exist on the Estero Trail loop, Sir Frances Drake Boulevard to Pierce Point Road, and a connection from Marshall Beach to Pierce Point Road; 6) Making the permit application process more bike friendly for events in the Park, including along Bolinas Ridge and out to the lighthouse; and 7) Allowing bike access to all the ranch roads in the pastoral zone that are already open to pedestrian access.

I appreciate the willingness of the NPS to consider better options for bikers to be able to enjoy the unique beauty of Pt. Reyes. These bike-friendly improvements will have minimal to no negative impacts to the ecology or long-term health of the ecosystem at Pt. Reyes, but will have a tremendous positive impact for bicyclists to be able to enjoy this amazing West Marin natural area.

#869

Name: N/A, N/A

Correspondence: The first time I drove to the Point Reyes Lighthouse, I was surprized to see large dairy cattle ranching operations on National Park Service lands.

The adverse impacts of ranching on Elk, other wildlife speies, soils, water quality, vegetation, wildlife and visitor experience are undeniable: piles of manure, muddy trails, accelerated erosion, weed-infested pastures, cows in Abbotts Lagoon and gigantic heaps of rotting vegetation called silage (pasture plants are mowed and then fermented to feed livestock when there is no grass available). Then there are the hay and dairy trucks which run up and down Sir Francis Drake Rd. seven days a week, impacting the road system due their weight. The road system in the park was not built to with stand these dual trailer hay/dariy trucks. It is my understanding that the NPS has no ownership of the Sir Francis Drake Rd. That all of the Marin county CITIZENs will have to pay for the rebuilding of Sir Francis Drake in the park. This a benifit to the ranching operations. The NPS is saddling the average tax payer with road repairs at a time when urban roads in Marin County are in needs of massive repair. During the forty years of visiting PRNP, I never drove past the ranching operations without wondering how much long will this land use in a NP be permitted to happen.

The ranched lands at Point Reyes are largely coastal prairie which supports many wildlife species. Several alternatives that the NPS wants to sell the public on "FLEXIBILITY and DIVERSIFICATION" introducing corps, and chickens. This is a crazy idea, WHY? because the NPS will only be embedding the ranch industry into a situation where citizens want less or no ranching withion the park boundies. More than 90 percent of this plant community has been disturbed or lost to fram production use. In other words, the coastal prairie, as well as the plants and wildlife it supports, is rare and deserves full protection and restoration, it is a National Park.

I understand that the ranches were grandfathered in under the national seashores enabling legislation. The government had purchased the ranches with citizens hard earned tax money. Allowing ranch operations to continue under leases for 25 years, or until the death of the ranch owner or his or her spouse does not do the ranch famlies a favor. The NPS need to establish a time for ranch operation to end within a 20 years period whith the clock having started in 2017.

Now I understand by attending the two public meetings that there has been lease's transferred from one ranch to another if a rancher decides to leave the business, this happens without NPS approval. It's a wild west lawless environment being conducted on the public National Park. Our parks lands under lease agreements must never to be transferable. Once a rancher decides to quit the business or move - those lease land return to the public for non-agribusiness. The NPS must put this into the plan and each rancher who continues must sign a document signifying that they know this is the law.

I believe the ranches have unacceptable environmental impacts, but for many years the Park Service simply chose not to, address the issue head-on. Why?? I think the NPS has been intimidated by the radical right ranchers from Utah and Nevada and how they took over the Malheur Wildlife Refuge in Oregon. Not until the NPS was sued by citizens groups for the impacts did this planning process get kick started. Now it must put to bed once and for all that ranch operations be put on a short time line for their continuance operations.

In July 2017, the plaintiffs, ranchers, and the National Park Service reached a settlement - the Park Service could extend grazing leases for five years and was to complete a comprehensive environmental assessment of the ranches and subsequent general management plan within four years. This agreement was considered a win-win by all. I believe that a 5 yr. lease plus a four planning process = nine years, at that time a final 5 year lease be added to end ranching in the park. This will allow ranchers time to move their operations into private areas in the surrounding counties or out of state. I have attended the recent Nov. 14 & 15th public meetings. I have the latest park informative booklets with Alternatives A-F. As business man for 50 years I understand the impacts this planning process will have on the ranch families. In no way do I wish harm to these families. But I must say that what has been allowed to happen in our Point Reyes NP is near criminal with non-approved land transfer deals, dairy and live stock herd size growth. Because of the reasons stated, I support the NPS Alternative F.

#870

Name: Larson, Stephanie

Correspondence: November 29, 2018

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, My name is Dr. Stephanie Larson and I am the Director of the University of California Cooperative Extension (UCCE) in Sonoma County, as well as Livestock and Rangeland advisor for both Marin and Sonoma Counties. I have worked with livestock and dairy producers, rangeland managers, public agencies, nonprofits and the public in Marin and Sonoma Counties for over thirty years. I received both a bachelors degree and a masters degree in Animal Science from the Universities of Idaho and Wyoming, respectively. I received my PhD. in Rangelands Ecology and Management from Oregon State University. As part of my job as the UCCE Livestock and Rangeland advisor, I provide education and research-based information to all affiliated parties on the importance of good natural resource practices and the need for local sustainable agriculture. Having worked with the livestock and dairy producers at Point Reyes National Seashore (PRNS), I know their operations well and the best management practices that have been implemented on their ranches. The Point Reyes National Seashore and North District of Golden Gate National Recreation Area General Management Plan Amendment has listed several alternatives for future management of PRNS from no continued ranching to ranching with 20-year leases. I have reviewed these alternative plans presented through the General Plan amendment process; however, a new alternative has been recently proposed, Community Alternative, which proposes the continued ranching and management of elk for effective separation from the ranches in the pastoral zone. I support this alternative as it provides for more flexible use of the existing ranches and dairies based on environmental and biological diversity, agricultural diversification opportunities, and a modest expansion of herds over the life of the permits. The alternative proposal allows for the following critical actions: " Issuing of

agricultural lease/permits with 20-year terms to existing ranch families to continue beef, dairy, and other associated agricultural operations on the approximately 27,000 acres within the planning area.

" Establishment of an PRNS Agricultural Advisory Committee, made up of local agricultural and natural resource conservation experts including a member from each: 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.

" Exploration of opportunities for ranch operational flexibility and diversification, establish up to approximately 900 acres of collaboratively managed resource protection buffers, and provide a programmatic review and approval process for operational flexibility, diversification and best management practices.

" Management of tule elk separate from ranches. No elk herds would be allowed to establish in the planning area.

" Implementation of strategies by NPS to remove non-native, invasive plants and to manage special status plants in collaboration with Point Reyes Seashore ranchers.

The following outlines the research based evidence of why I support the Community Alternative.

Alternative Supporting Documentation Ranching at Point Reyes began when Mexican land grantees first introduced cattle to the area in the mid-1800s. Dairying followed and soon became a dominant agricultural land use at Point Reyes and in Marin County (Livingston, 1994). I have worked with beef and dairy producers at PRNS throughout my entire career, providing advice and conducting livestock and natural resource projects designed to support good grazing practices, environmental stewardship, and economically sound ranch management. Some projects with the PRNS beef and dairy producers include short courses on practices to maintain water quality and how to prepare Ecological Site Descriptions (ESD). Agriculture has always been an integral part of the Point Reyes National Seashore landscape. Native Americans managed these lands for the production of food, fiber, and other vital resources (Anderson, 2005). Through the 1980s and 1990s and into the early 2000s, efforts to conserve threatened and endangered (special status) species on western rangelands often meant removing livestock ranching. Research findings, demonstration results, and failed conservation efforts in recent years involving endangered species has reinforced support for the continuation of livestock ranching and the reintroduction of grazing to some rangelands that were protected through grazing removal. At the landscape level, research has demonstrated that livestock ranching maintains extensive, open spaces by reducing land use conversion, fragmentation of habitat, and vegetation type conversion from invasion of brush.

Point Reyes National Seashore (PRNS) is home to 20,000 acres of coastal grasslands made up of native and non-native species. Nearly 80% of the remaining grasslands in the park are non-native due to several factors including lack of fire, increased grazing, and the introduction of non-natives. While Native Americans likely burned grasslands in order to improve harvest of grains, tubers, and bulbs, which would have prevented many grasslands from succeeding into coastal shrub or other forest communities, the impacts of cattle grazing and the introduction of non-native annual grasses have dramatically changed the landscape.

Lack of burning and grazing has resulted in increased brush lands at PRNS, with coyote brush being the greatest increaser. Coyote brush, *Baccharis pilularis* DC., can be weedy due to the prevalence of the wind dispersed seeds of this common shrub. It can be a problem in range or pastures (Robbins et al., 1970). This plant may become weedy or invasive in some regions or habitats and may displace desirable vegetation if not properly managed.

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. This designated pastoral zone is where livestock and dairy producers permitted operations reside. These permitted producers are charged an annual lease based on the lands carrying capacity. In 2004, beef and dairy producers began to express concerns about the impact elk on their livestock's forage, the integrity of their organic certifications, and overall economic viability of their operations.

The pastoral zone is a legacy landscape shaped by the Native American cultural practices of burning and historic grazing. This historic cultural and working agricultural landscape today includes 18,000 acres (20%) of the PRNS and 10,000 acres of the North District of the Golden Gate National Recreation Area (GGNRA). Twenty-four families hold lease/special use permits for cattle and dairy operations. The designated pastoral zone, where livestock and dairy producers permitted operations reside, is charged an annual lease based on the lands carrying capacity. Since 2004, beef and dairy producers began to express concerns about the impact elk were having on forage, organic certifications, and overall economic viability on their operation. In 2014, PRNS initiated the Ranch Comprehensive Management Plan to assess growing concerns of beef and dairy producers related to the free-ranging tule elk impacts to the pastoral zone. Point Reyes National Seashore has not implemented any of their 1998 control methods, and are currently only hazing elk away from permitted operations. The efficacy of training elk away from the pastoral zone is in question; and PRNS has stated an inability to do more control due to recent litigation.

In late 1999, Point Reyes National Seashore removed cattle grazing from the D Ranch, which is in the pastoral zone. The D ranch remains a historic piece of the agricultural land, but without proper management it has lost its historic grassland character. With the removal of livestock grazing, a change in both plant and animal species assemblages occurred, and an unauthorized elk herd has taken residence.

Elk Management Tule elk were extirpated from the subject area by the 1860s. Tule elk were not present when Congress entrusted the National Park Service (NPS) to protect the seashore, the ranches and farms, and the people on the ranches and farms. Only a few years ago, NPS decided to re-introduce tule elk to the 18,000-acre designated elk range located entirely within the Limantour wilderness area. By this time (1998), it was well known that introduced tule elk in an area without predators could become highly invasive. The current elk management plan reassured seashore ranchers at the time that the ranch lands would be protected because the plan stated that the elk would not negatively affect any other permitted use (long-standing ranch SUPs) and the plan included tools to manage elk overpopulation, including contraception, relocation and culling. The Seashores 2001 Year in Review acknowledged the need to carefully monitor and keep the elk outside the pastoral zone, to prevent their interfering with the cattle ranches and to ensure that the elk are not shedding the organism that causes Johnes disease. Nevertheless, beginning in about 2002, the park stopped actively managing the elk and efforts to keep the elk out of the pastoral zone ceased. 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.

Brush Control 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 fire or 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. For hundreds of years, or perhaps a millennium, humans have facilitated the persistence of this important ecosystem, through fire, grazing, and mowing. However, these historic facilitated fires ceased leading to a buildup of dry invasive brush. 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 in PRNS and the surrounding communities. Point Reyes Seashore Ranchers Association (PRSRA) supports all efforts to address the fact that brush management has occurred on coastal prairies for all recorded history, a fact that has also been identified through anthropological review. The ecosystem would benefit, preserving the grassland habitat, if ranchers were allowed to control invasive brush from their pasturelands. PRSRA is committed to working with the University of California Division of Agriculture and Natural Resources (UC ANR) advisors to identify the best timing for brush removal to reduce adverse effects to other species. Rangeland ecologists and watershed managers understand that nutrients and sediments are better controlled and better treated by grass-covered soil than brush covered soil. The bare soils often found in the shade of the invasive brush allow water to travel more quickly and with less soil absorption and less plant nutrient uptake. If the Community Alternative is accepted, future research studies can examine the water quality benefits of allowing ranchers to continue the tradition of brush control as well as the degraded water quality that would result in any prohibition of brush control.

At PRNS, coyote brush encroachment is overtaking good pasture, which is an issue affecting many ranchers throughout the California coastal rangeland. Consideration is needed to determine when and where to remove the brush as it is vitally important to acknowledge the ecosystem services provided given that pasture is tremendous habitats for coastal rangeland birds and other animals. Providing a balanced habitat positively contributes to regenerative ranching which promotes biological diversity in the pasture. 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, making its management an important goal for both ranchers and park staff. Previous brush control has included mowing and goat introduction, but this attempt has been unsuccessful due to time, cost, and goat health.

Animal Behavior 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). Due to poorer forage quality most elk ranges experience during winter seasons, this further correlates to a seasonal effect (Figure 1). 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. The roads 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. 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

prohibited at PRNS). Elimination of potential benefits of co-grazing for ranchers creates a need to improve elk habitat outside of the pastoral zone.

Threats to Biodiversity & Soil Health Without managed livestock grazing, threats to native biodiversity, including special-status species, are likely to increase with removal or decrease of grazing. At PRNS, the removal of grazing and fire has resulted in the increase of coyote brush. Research and experience have shown that grazing is strongly linked to maintaining habitat for some special-status species on PRNS lands, while they have been inconclusive for others. In all cases though, 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 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 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 (The Changing Role of Agriculture at the Point Reyes National Seashore, 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. In Marin and Sonoma counties and on PRNS, ranchers have developed numerous springs and ponds to capture runoff to water for their cattle. 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 fencing may not always be the best solution. Conversely at Yellowstone National Park, the lack of management of elk caused damaged to riparian areas. In order to managed 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 (

At the Rocky Mountain National Park, elk and vegetation management is guided by a 20-year plan that addresses the impacts of overabundant elk on vegetation. This plan's goal is to restore the natural range of variability in the elk population and affected plant communities. The plan relies on a variety of conservation tools including temporary fencing, vegetation restoration, redistribution and culling; and may use additional management tools in the future using adaptive management principles. 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. The Rocky Mountain National Park elk management plan, pays special care to the importance of monitoring elk grazing as it can adversely affect special status species. Good elk management ensures the protection of these special status species. Therefore, the 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 plenty of grazing at Limantour and Tomales Point " Ranchers should be the grazing stewards in the pastoral zone as they are already responsible for preventing overgrazing and undergrazing within their operation " Sustainable grazing is better for the natural resources in the pastoral zone.

Local Food Production 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. Sonoma and Marin Counties are perfect models for demonstrating how preserving family farms 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 Sonoma and Marin Counties, including PRNS, albeit smaller scale, 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).

Currently, the pasture rule requires dairy cattle to graze a minimum of 120 days per year and obtain, on average, at least 30% of their dry matter intake by grazing (Rinehart and Baier, 2011). When managed effectively, this allows organic dairies to utilize pasture for a low-input management system, by grazing at or above the required minimum. However, the organic regulations also emphasize the importance of maintaining or improving the natural resources of the operation, defined as physical, hydrological, and biological features of a production operation, including soil, water, wetlands, woodlands, and wildlife (National Organic Program, 7 CFR § 205.200).

While much of the wildlife is not likely negatively affect 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).

Of all the alternatives proposed by the Point Reyes National Seashore, the Community Alternative provides the most 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 plant management, while increasing water quantity and quality and sequestering of atmospheric carbon in rangelands soils. Working collaboratively, PRNS and beef and dairy producers will maintain the natural resources for the next 200 years.

Sincerely,

Stephanie Larson, PhD UC Cooperative Extension Livestock & Range Management Farm Advisor Certified Rangeland Manager #73

References

- Adams, D.B. 2004. Habitat assessment of the endangered Myrtles silverspot butterfly. Master of Arts in Biology thesis, San Francisco State University, 41.
- Anderson, M. K. 2005. *Tending the Wild: Native American Knowledge and the Management of California's Natural Resources*. Berkeley, University of California Press, 526.
- Anderson, E. W. and R. J. Scherzinger. 1975. Improving Quality of Winter Forage for Elk by Cattle Grazing. *Journal of Range Management*, 28(2), 120-125.
- Beck, J. L. and J. M. Peek. 2005. Diet Composition, Forage Selection, and Potential for Forage Competition Among Elk, Deer, and Livestock on Aspen-Sagebrush Summer Range. *Rangeland Ecology & Management*, 58(2), 135-147.
- Boyce, M. S., J. S. Mao, E. H. Merrill, D. Fortin, M. G. Turner, J. Fryxell, and P. Turchin. 2003. Scale and heterogeneity in habitat selection by elk in Yellowstone National Park. *Écoscience* 10(4), 421-431.
- Collins, W. B. and P. J. Urness. 1983. Feeding Behavior and Habitat Selection of Mule Deer and Elk on Northern Utah Summer Range. *The Journal of Wildlife Management*, 47(3), 646-663.
- Dalke, P. D., R. D. Beeman, F. J. Kindel, R. J. Robel, and T. R. Williams. 1965. Seasonal Movements of Elk in the Selway River Drainage, Idaho. *The Journal of Wildlife Management*, 29(2), 333-338.
- da Silva, P. G. and J. W. Bartolome. 1984. Interaction between a shrub, *Baccharis pilularis* subsp. *consanguinea* (Asteraceae), and an annual grass, *Bromus mollis* (Poaceae), in coastal California. *Madroño*, 31(2), 93-101.
- Davis, L.H. 1992a. The ecology of *Chorizanthe valida* Wats. Polygonaceae; the rare Sonoma spineflower at Point Reyes National Seashore, Marin County, California. M.S. thesis, Sonoma State University.
- Davis, L. H., and R. J. Sherman. 1992b. Ecological study of the rare *Chorizanthe valida* (POLYGONACEAE) at Point Reyes National Seashore California. *Madroño* 39, 271-280.
- Edge, W. D., C. L. Marcum, and S. L. Olson-Edge. 1987. Summer habitat selection by elk in western Montana: a multivariate approach. *The Journal of wildlife management*, 844-851. Federal Register, Part II. Department of the Interior Fish and Wildlife Service. April 2006. Endangered and Threatened Wildlife and Plants; Designation of Critical Habitat for the California Red-Legged Frog, and Special Rule Exemption Associated With Final Listing for Existing Routine Ranching Activities; Final Rule. Retrieved from: <https://www.gpo.gov/fdsys/pkg/FR-2006-04-13/pdf/06-3344.pdf>. Federal Register, Vol. 71, p. 19255 (April 13, 2006), Retrieved from: <https://www.gpo.gov/fdsys/pkg/FR-2006-04-13/pdf/06-3344.pdf>.
- Found, R. and C. C. St. Clair. 2016. Behavioural syndromes predict loss of migration in wild elk. *Animal Behaviour*, 115, 35-46.
- Green, R. A. and G. D. Bear. 1990. Seasonal cycles and daily activity patterns of Rocky Mountain elk. *The Journal of Wildlife Management*, 54(2), 272-279.
- Greene, C. 2017. Organic Market Overview. USDA-ERS.
- Grover, K. E. and M. J. Thompson. 1986. Factors influencing spring feeding site selection by elk in the Elkhorn Mountains, Montana. *The Journal of Wildlife Management*, 50(3), 466-470.
- Hansen, R. M. and L. D. Reid. 1975. Diet overlap of deer, elk, and cattle in Southern Colorado. *Journal of Range Management*, 28(1), 43-47.
- Hollenbeck, J.P., W.J., Ripple. 2008. Aspen snag dynamics, cavity-nesting birds, and trophic cascades in Yellowstone's northern range. *For Ecol Manage* 255, 1095-1103.
- Livingston, D.S. 1994. *Ranching on the Point Reyes Peninsula: A History of the dairy and beef ranches within the PRNS, 1834-1992*. National Park Service, Point Reyes Station, CA. 544.
- Mao, J. S., M. S. Boyce, D. W. Smith, F. J. Singer, D. J. Vales, J. M. Vore, E. H. Merrill, and Hudson. 2005. Habitat selection by elk before and after wolf reintroduction in Yellowstone National Park. *Journal of Wildlife Management*, 69(4), 1691-1707.
- McBride, W. D. and C. Greene. 2009. Characteristics, costs, and issues for Organic Farming, ERR-82. USDA-ERS, Washington, D.C.
- McCorquodale, S. M. 1993. Winter foraging behavior of elk in the Shrub-Steppe of Washington. *The Journal of Wildlife Management*, 57(4), 881-890.
- National Organic Program. Code of Federal Regulations Title 7, Pt. 205.200.
- Rilla, Ellie and Lisa Bush. 2009. *The Changing Role of Agriculture in Point Reyes*

National Seashore. University of California, Agriculture and Natural Resources. Retrieved from: <http://ucanr.edu/sites/uccemarin/files/31000.pdf>. Rinehart, L. and A. Baier. 2011. Pasture for organic ruminant livestock: Understanding and implementing the National Organic Program (NOP) Pasture Rule. USDA National Organic Program, Washington, D.C. Ripple, W.J., R.L. Beschta (2012) Trophic cascades in Yellowstone: The first 15years after wolf reintroduction. *Biol. Conserv.* 145, 205-213. Ripple, W.J., R.L. Beschta (2007) Restoring Yellowstone's aspen with wolves. *Biol. Conserv.*, 138, 514-519. Sacramento Fish and Wildlife Field Office. U.S. Fish and Wildlife Service, Sacramento, California. January 2009. Myrtles silverspot butterfly, (*Speyeria zerene myrtleae*), 5-Year Review: Summary and evaluation. Retrieved from: https://ecos.fws.gov/docs/five_year_review/doc2394.pdf. Schwartz, J. E. and G. E. Mitchell. 1945. The Roosevelt elk on the Olympic Peninsula, Washington. *The Journal of Wildlife Management*, 9(4),295-319. Steinberg, P. 2002. *Baccharis pilularis*. in: Fire Effects Information System. U.S. Department of Agriculture, Forest Service, Rocky Mountain Research Station, Fire Sciences Laboratory. <https://www.feis-crs.org/feis/>. Accessed on April 17, 2017. Unsworth, J. W., L. Kuck, E. O. Garton, and B. R. Butterfield. 1998. Elk habitat selection on the Clearwater National Forest, Idaho. *The Journal of Wildlife Management*, 62(4), 1255-1263. USDA-ERS. 2014. Estimated U.S. sales of organic and total fluid milk products, month and annual. USDA-ERS, Washington, D.C. USDA. 2007. Dairy 2007, Part I: Reference of dairy cattle health and management practices in the United States, 2007. USDA-APHIS-VS, CEAH, Fort Collins, CO. USDA. 2016. Dairy cattle management practices in the United States, Dairy 2014. USDA-APHIS-VS, CEAH, Fort Collins, CO. U. S. Fish and Wildlife Service. 1998. Recovery Plan for Seven Coastal Plants and the Myrtles Silverspot Butterfly. U.S. Fish and Wildlife Service, Portland, Oregon. 141 pp. U. S. Fish and Wildlife Service. 2002. Memorandum re: Formal Consultation on the Grazing Permit Renewal Program, Point Reyes National Seashore and the Golden Gate National Recreation Area, Marin County, California. 29. U.S. National Park Service. 2001. Biological Assessment on the Renewal of Livestock Grazing Permits in Point Reyes National Seashore and the North District of Golden Gate National Recreation Area Marin County, California., 65. U.S. National Park Service. 2007. Habitat Assessment of Myrtles Silverspot Butterfly at Point Reyes National Seashore. Pacific Coast Science and Learning Center, 2 Wallace, M. C. and P. R. Krausman. 1987. Elk, mule deer, and cattle habitats in Central Arizona. *Journal of Range Management* 40(1), 80-83. Walter, W. D., M. J. Lavelle, J. W. Fischer, T. L. Johnson, S. E. Hygnstrom, and K. C. VerCauteren. 2010. Management of damage by elk (*Cervus elaphus*) in North America: a review. *Wildlife Research*, 37(8), 630-646. Williams, K. and R. J. Hobbs. 1989. Control of shrub establishment by springtime soil water availability in an annual grassland. *Oecologia* 81(1), 62-66.

Figure 1. Seasonal variation in daily time budget of feeding, resting, and moving activities in Rocky Mountain elk in Rocky Mountain National Park (Green and Bear, 1990).

#871

Name: Van Arsdale, Katharine

Correspondence: I support Alternative B, which strikes a healthy balance between wildlife/natural setting and the historic ranching operations that are an integral part of the story of Point Reyes. In reduced measure I support other alternatives that allow for continued ranching on Point Reyes, with the exception of Alternative E. I am deeply, strongly opposed to Alternative E. I do not support beef ranching in general as I personally do not support the slaughter of animals for food. I see no benefit to removing the dairy ranching while allowing beef ranching to remain. I vehemently oppose that suggestion. I oppose Alternative C because the elk are wild animals on public land and should be managed, not removed. I oppose Alternative F because the government made an agreement with these historic ranches to allow continued ranching, and that agreement should be honored in continuing amendments to Point Reyes management. I strongly believe that managed dairy ranching should be allowed to continue (beef ranching could be discontinued, in my opinion, but is somehow not on the list of alternatives) because it is historic, it is agreed upon, and it is good for both public health (to have locally produced dairy products that come from such a clean, well-managed location) and the economy. The elk herd should be managed according to the best practices set out by the National Parks Service. I do not believe that the herd should be removed, because at this time that alternative is not portrayed as the best solution according to the NPS.

#872

Name: Holden, John

Correspondence: I would like to see more public access and improved trails for biking. Thank you

#873

Name: Hosmer, Jordan

Correspondence: Hello,

As a Marin resident, outdoor activities fanatic, and avid mountain biker, I would love to see the expansion of new mountain bike trail access. I want to take this opportunity to voice my support for the following projects:

- A new trail between Devil's Gulch and Platform Bridge through the Cheda, McIsaac, and Zanardi Ranches.
- A plan to connect the Cross Marin Trail into Point Reyes.
- Adoption of social trails off Bolinas Ridge for better connectivity and a single-track trail experience.
- Extend the Olema Valley Trail to Bolinas on the east side of Highway 1.
- Close gaps for bikes through ranch lands in the park, including closing the Estero Trail loop, connecting Sir Francis Drake Blvd. with Pierce Point Road, and connecting Marshall Beach to Pierce Point Road,
- A more bike-friendly permit application process for road and mountain bike events in the park, including along Bolinas Ridge and out to the lighthouse.
- Bike access to all ranch roads in the pastoral zone that are already open to pedestrians.

Thank you very much for taking this into consideration. Sincerely, Jordan

#874

Name: Morgan, Mary

Correspondence: The EIS should consider the following: (1) the social and economic impacts of limiting or discontinuing ranching and/or dairy farming in the Seashore. This includes the impact on schools, the local economy, the ethnic diversity of the region, and the agricultural sector in general in Marin; (2) how many visitors NPS can realistically take care of in terms of trash, etc.; (3) impact on wildlife, cattle, hikers, and horseback riders of more bicycle use on ranch roads and trails; (4) whether culling the elk herds is realistic given potential political opposition to it; (5) the many benefits of Congressman Huffman's bill to allow local Native Americans to hunt elk; (5) the detrimental impact on the ranchers and their families of having leasing less than 20 years.

#875

Name: More, Michael

Correspondence: To Whom it May Concern.

Thank you very much for engaging in this process of expanding mountain bike opportunities in our local National Parks.

Before submitting my specific comments, I would like to say that in general I support the MCBC trail suggestions and additionally make it very clear that the MCBC has no intention or request to leverage this trail expansion opportunity as a way to gain access to Wilderness areas that are off limits to bikes.

My specific trail requests: 1) Expand the Cross Marin trail into Point Reyes, a vastly important Regional Trail connection. You were working on it for years and then stopped? This time please deploy the resources to get this done! 2) A trail from Devil's Gulch to Platform Bridge across ranch roads and trail connections as necessary. The public owns this acreage yet the only visible sign of that until now has been the GGNRA sign just west of SP Taylor Park. It is time for us to access the fruits of this acquisition! 3) Close the gaps through the ranch roads and open the ranch roads closed to bicycles. Bicyclists have proven they can co-exist with equestrians and other users through the cooperative use of the Olema Valley trail. 4) Speaking of The Olema Valley Trail, extend it South to Bolinas, a boon in connectivity for West Marin and especially Bolinas. Also please reroute the problematic swampy sections and the steep muddy sections for a major overhaul of this (IMHO) under performing crucial trail; previous rehab projects (of which I have participated in a couple of) have been piecemeal!! 5) New trail opportunities on Bolinas Ridge, a vast acreage with Randal Trail being the only viable climb from the West other than the Ridge trail itself. My suggestion would be a "contouring, climbing" multi-use trail from the base of Randal to the top of McCurdy (or vice versa)??? 6) Generally create a more bicycle friendly trail application process that would see the National Park being out in front of catering to one of its largest user groups on a more level playing field.

Thank you very much for vthe opportunity to comment on this much needed trail expansion process,

Sincerely, Michael More.

#876

Name: Cronk, Charlie

Correspondence: I wanted to voice my full support for opening the proposed connector trails to cyclist use. MCBC has proven to be a thoughtful and conscientious voice in gaining safer access for bikes. The proposed trails make a lot of sense to get more riders off the busy roads of Western Marin, as well as connect, and extend current ride routes. I know many of the proposed paths, and each seem like very safe additions which are mindful of the pristine open spaces.

Thanks for your consideration. Charlie Cronk

#877

Name: McChesney, William

Correspondence: As a hiker, I value the wilderness and natural quiet trails, and prefer to keep things this way. I hope the NPS will find a way to preserve the special experience of hiking, without constantly having to look over my shoulder for speeding bikes.

Thanks.

#878

Name: Cooper, Cortis

Correspondence: I'm the head coach of a middle-school mountain biking team in the Bay Area. We have grown from 10 to 45 kids in the past 4 years. There remains few options for us to give these kids good exercise. Most don't want to walk or hike but they love to ride their bikes. Please consider opening up the following to mountain bikes:

1. A new trail between Devil's Gulch and Platform Bridge through Cheda, McIsaac and Zanardi Ranch.
2. A plan to connect the Cross Marin Trail into Point Reyes.
3. Adoption of social trails off Bolinas Ridge for better connectivity and a single-track trail experience.
4. Extend the Olema Valley Trail to Bolinas on the east side of Highway 1.
5. Close gaps for bikes through ranch lands in the park, including closing the Estero Trail loop, connecting Sir Francis Drake Blvd. with Pierce Point Road and connecting Marshall Beach to Pierce Point Road,

6. A more bike-friendly permit application process for road and mountain bike events in the park, including along Bolinas Ridge and out to the lighthouse. 7. Bike access to all ranch roads

#879

Name: Ritchey, Jed

Correspondence: Please support more bike access on more trails. My family would love to enjoy the Seashore on mountain bikes.

#880

Name: LePelch, Patrick

Correspondence: I am in support of providing additional bike-legal trails in the Point Reyes GGNRA and national seashore areas. The Marin area is woefully lacking in single track riding for those that enjoy cycling in the area. Cyclists are environmentally aware individuals who appreciate what our area has to offer and use trails to see what this amazing landscape has to offer. We hope you will consider the opening of new trails. There is plenty of open space and there are plenty of opportunities to provide use trails for users of the Park system. I have been a mountain biker for 25 years and I have universally received feedback from other riders who find this area woefully lacking in comparison to almost all other open space/ park areas in the United States. This is ironic given that the mountain bike was birthed here, yet we have by far the least amount of mountain bike access-worthy trails in the nation. Let's change that! Walkers have successfully blocked openings simply because hikers have been around longer and they have more political clout in their numbers. Open spaces should be open to all users when managed correctly. Patrick

#881

Name: Smith, Stewart

Correspondence: Can we get rid of these "historical" ranches please? I want the elk to roam free and plants to grow in this space.

#882

Name: N/A, Tom

Correspondence: I have been riding horses at the Pt Reyes Sea Shore for many years. I've read about the bicycle group wanting more and more trails and think it's time put a hold on more access. Bikes have more than enough places to ride. I have encountered bikes on narrow trails too often, it's just not safe for anybody.

#883

Name: Zupancic, Debra

Correspondence: I support the following projects:

- A new trail between Devil's Gulch and Platform Bridge through the Cheda, McIsaac, and Zanardi Ranches.
- A plan to connect the Cross Marin Trail into Point Reyes.
- Adoption of social trails off Bolinas Ridge for better connectivity and a single-track trail experience.
- Extend the Olema Valley Trail to Bolinas on the east side of Highway 1.
- Close gaps for bikes through ranch lands in the park, including closing the Estero Trail loop, connecting Sir Francis Drake Blvd. with Pierce Point Road, and connecting Marshall Beach to Pierce Point Road.
- A more bike-friendly permit application process for road and mountain bike events in the park, including along Bolinas Ridge and out to the lighthouse.
- Bike access to all ranch roads in the pastoral zone that are already open to pedestrians.

Thank you

Deb

#884

Name: McGibben, Mike

Correspondence: To whom it may concern.

I have reviewed the MCBC proposal for increased bicycle access in around the GGNRA and Point Reyes National Seashore. I wholeheartedly support the presented measures which will improve both safe access to trails and the communities enjoyment of this special area. Yours, Mike

#885

Name: Murphy, Tim

Correspondence: Greetings,

Please create more bike trails in Pt Reyes National Seashore, and surround areas. We really need more bike access. Kids are getting into bike riding, and it's a great sport that can take them through adulthood. In particular, we need more single track trails to challenge riders of all levels. They are also less damaging to the surrounding land. And bike riders are amazing trail builders/maintainers!

A few ideas to consider - although not all are on NPS land.:

1. A new trail between Devil's Gulch and Platform Bridge through Cheda, McIsaac and Zanardi Ranch.
2. A plan to connect the Cross Marin Trail into Point Reyes.
3. Adoption of social trails off Bolinas Ridge for better connectivity and a single-track trail experience.
4. Extend the Olema Valley Trail to Bolinas on the east side of Highway 1.
5. Close gaps for bikes through ranch lands in the park, including closing the Estero Trail loop, connecting Sir Francis Drake Blvd. with Pierce Point Road and connecting Marshall Beach to Pierce Point Road,
6. A more bike-friendly permit application process for road and mountain bike events in the park, including along Bolinas Ridge and out to the lighthouse.
7. Bike access to all ranch roads in the pastoral zone that are already open to pedestrians.

#886

Name: Solway, Sean

Correspondence: I support MCBC in it's efforts to ensure equal, safe access for all user groups including the under-represented biking user group for use on the trails in the Non-Wilderness areas of the Pt Reyes National Seashore. For far too long, this legitimate, growing user group has been excluded (and discriminated against by other groups) from access to these areas of Public Land! It's time to recognize that this land belongs to everyone and should be shared equally and fairly. Here is a list of the trails and projects that I support: A new trail between Devil's Gulch and Platform Bridge through the Cheda, McIsaac, and Zanardi Ranches. A plan to connect the Cross Marin Trail into Point Reyes. Adoption of social trails off Bolinas Ridge for better connectivity and a single-track trail experience. Extend the Olema Valley Trail to Bolinas on the east side of Highway 1. Close gaps for bikes through ranch lands in the park, including closing the Estero Trail loop, connecting Sir Francis Drake Blvd. with Pierce Point Road, and connecting Marshall Beach to Pierce Point Road, A more bike-friendly permit application process for road and mountain bike events in the park, including along Bolinas Ridge and out to the lighthouse. Bike access to all ranch roads in the pastoral zone that are already open to pedestrians.

Thank you, Sean Solway

#887

Name: Held, William

Correspondence: I support MCBC in it's efforts to ensure equal, safe access for all user groups including the under-represented biking user group for use on the trails in the Non-Wilderness areas of the Pt Reyes National Seashore. For far too long, this legitimate, growing user group has been excluded (and discriminated against by other groups) from access to these areas of Public Land! It's time to recognize that this land belongs to everyone and should be shared equally and fairly. Here is a list of the trails and projects that I support: -A new trail between Devil's Gulch and Platform Bridge through the Cheda, McIsaac, and Zanardi Ranches. -A plan to connect the Cross Marin Trail into Point Reyes. -Adoption of social trails off Bolinas Ridge for better connectivity and a single-track trail experience. -Extend the Olema Valley Trail to Bolinas on the east side of Highway 1. -Close gaps for bikes through ranch lands in the park, including closing the Estero Trail loop, connecting Sir Francis Drake Blvd. with Pierce Point Road, and connecting Marshall Beach to Pierce Point Road, -A more bike-friendly permit application process for road and mountain bike events in the park, including along Bolinas Ridge and out to the lighthouse. -Bike access to all ranch roads in the pastoral zone that are already open to pedestrians.

Thank you,

-William Held

#888

Name: Rabin, Daniel

Correspondence: I am writing in support of the following proposed bike trails. These additional bike trails will increase safety for bikers and cars by removing bikers off of some highly trafficked roads.

-A new trail between Devil's Gulch and Platform Bridge through the Cheda, McIsaac, and Zanardi Ranches.

-A plan to connect the Cross Marin Trail into Point Reyes.

-Adoption of social trails off Bolinas Ridge for better connectivity and a single-track trail experience.

-Extend the Olema Valley Trail to Bolinas on the east side of Highway 1.

-Close gaps for bikes through ranch lands in the park, including closing the Estero Trail loop, connecting Sir Francis Drake Blvd. with Pierce Point Road, and connecting Marshall Beach to Pierce Point Road,

-A more bike-friendly permit application process for road and mountain bike events in the park, including along Bolinas Ridge and out to the lighthouse.

- Bike access to all ranch roads in the pastoral zone that are already open to pedestrians.

Thank you.

Daniel Rabin

#889

Name: Schulze, Mark

Correspondence: Please make more mountain bike trails for all and we will come and share the trails and spend \$ there to help your local economy. Thanks Mark and Patty :)

#890

Name: N/A, Eva

Correspondence: I back the MCBC's suggestions for improved bike access and safety in the Point Reyes area.

1. A new trail between Devil's Gulch and Platform Bridge through Cheda, McIsaac and Zanardi Ranch. 2. A plan to connect the Cross Marin Trail into Point Reyes. 3. Adoption of social trails off Bolinas Ridge for better connectivity and a single-track trail experience. 4. Extend the Olema Valley Trail to Bolinas on the east side of Highway 1. 5. Close gaps for bikes through ranch lands in the park, including closing the Estero Trail loop, connecting Sir Francis Drake Blvd. with Pierce Point Road and connecting Marshall Beach to Pierce Point Road, 6. A more bike-friendly permit application process for road and mountain bike events in the park, including along Bolinas Ridge and out to the lighthouse. 7. Bike access to all ranch roads in the pastoral zone that are already open to pedestrians.

Thank you

#891

Name: Van Der Wal, John & Susan

Correspondence: We support Alternative C. We would prefer agricultural leases of 20-year terms.

"No new herds would be allowed to establish in the planning area." How do you realistically expect to prevent that from occurring. The elk when removed from 2 areas in 2015 & 2017 have returned and the same occurs with the hazing. They will just return.

Thank you.

Susan & John Van Der Wal

#892

Name: N/A, Fred

Correspondence: Please protect Pt. Reyes trails from bikers.

Hikers need a secure set of trails for hiking without being threatened by bikers.

Please help the large hiking community in the Bay Area and nationally.

Thanks, Fred

#893

Name: Thompson, Christen

Correspondence: Hello,

I am an avid cyclist and believe it would make perfect sense to extend the olema valley trail to bolinas, allowing cyclocross riders to avoid the car traffic on highway one.

It would be great if cyclists we're allowed on the ridge trail turning it into an epic loop. And connecting some other loops would be helpful as well to allow for easier access.

#894

Name: Perry, Andrew

Correspondence: I support MCBC in it's efforts to ensure equal, safe access for all user groups including the under-represented biking user group for use on the trails in the Non-Wilderness areas of the Pt Reyes National Seashore. For far too long, this legitimate, growing user group has been excluded (and discriminated against by other groups) from access to these areas of Public Land! It's time to recognize that this land belongs to everyone and should be shared equally and fairly. Here is a list of the trails and projects that I support: A new trail between Devil's Gulch and Platform Bridge through the Cheda, McIsaac, and Zanardi Ranches. A plan to connect the Cross Marin Trail into Point Reyes. Adoption of social trails off Bolinas Ridge for better connectivity and a single-track trail experience. Extend the Olema Valley Trail to Bolinas on the east side of Highway 1. Close gaps for bikes through ranch lands in the park, including closing the Estero Trail loop, connecting Sir Francis Drake Blvd. with Pierce Point Road, and connecting Marshall Beach to Pierce Point Road, A more bike-friendly permit application process for road and mountain bike events in the park, including along Bolinas Ridge and out to the lighthouse. Bike access to all ranch roads in the pastoral zone that are already open to pedestrians.

#895

Name: Brooks, Jason

Correspondence: To whom it may concern- I recently learned of the public comment period related to creating bike access along with other users (horse, hikers, etc.) for Pt. Reyes. As a resident of Marin and active Mt. Biker I appreciate any efforts you can make to ensure equal access for all users. As someone who enjoys hiking in Pt. Reyes it would be great to be able to add biking into the mix as a way to enjoy the park.

Thanks, Jason

#896

Name: Hodge, Carolyn

Correspondence: Please increase bicycle access in Pt Reyes. As a frequent hiker, road and offroad cyclist I support Marin Bicycle Coalition proposals for increased bike access in Pt. Reyes including:

- A new trail between Devil's Gulch and Platform Bridge through the Cheda, McIsaac, and Zanardi Ranches.

- A plan to connect the Cross Marin Trail into Point Reyes.

- Adoption of social trails off Bolinas Ridge for better connectivity and a single-track trail experience.

- An extension of the Olema Valley Trail to Bolinas on the east side of Highway 1.

- Gap closures for bikes through ranch lands in the park, including closing the Estero Trail loop, connecting Sir Francis Drake Blvd with Pierce Point Road, and connecting Marshall Beach to Pierce Point Road.

- A more bike-friendly permit application process for road and mountain bike events in the park, including along Bolinas Ridge and out to the lighthouse.
- Bike access to all ranch roads in the pastoral zone that are already open to pedestrians.

Thank you for considering these proposals.

#897

Name: Gowan, Jeff

Correspondence: Please consider the proposals from the MCBC to improve bike access in Pt. Reyes including: A new trail between Devil's Gulch and Platform Bridge through the Cheda, McIsaac, and Zanardi Ranches.

A plan to connect the Cross Marin Trail into Point Reyes.

Adoption of social trails off Bolinas Ridge for better connectivity and a single-track trail experience.

An extension of the Olema Valley Trail to Bolinas on the east side of Highway 1.

Gap closures for bikes through ranch lands in the park, including closing the Estero Trail loop, connecting Sir Francis Drake Blvd with Pierce Point Road, and connecting Marshall Beach to Pierce Point Road.

A more bike-friendly permit application process for road and mountain bike events in the park, including along Bolinas Ridge and out to the lighthouse.

Bike access to all ranch roads in the pastoral zone that are already open to pedestrians.

Thank you, -Jeff

#898

Name: Gannon, Jim

Correspondence: We favor alternative B which seems reasonable allowing existing ranch lands to operate of 20 years. This provides a long enough period for ranchers removing short term uncertainty but allowing for longer term land needs and changes in the future.

Continued access to public lands for users is an important aspect of the process with respect to protecting or improving natural environments. Public access is critical for sustaining natural environments - both the needed restrictions and increased access.

We do not believe increased bike use is warranted with respect to this NPS land beyond existing ranch and disturbed areas. Access to wilderness or undisturbed natural land/trails should be limited to foot traffic only. Existing bike use policy in this NPS property seems to be fair and reasonable. Expanding it to natural or single track trails should not be a near term goal for land use.

#899

Name: Lovette, Dan

Correspondence: I support MCBC in it's efforts to ensure equal, safe access for all user groups including the under-represented biking user group for use on the trails in the Non-Wilderness areas of the Pt Reyes National Seashore. For far too long, this legitimate, growing user group has been excluded (and discriminated against by other groups) from access to these areas of Public Land! It's time to recognize that this land belongs to everyone

and should be shared equally and fairly. Here is a list of the trails and projects that I support: A new trail between Devil's Gulch and Platform Bridge through the Cheda, McIsaac, and Zanardi Ranches. A plan to connect the Cross Marin Trail into Point Reyes. Adoption of social trails off Bolinas Ridge for better connectivity and a single-track trail experience. Extend the Olema Valley Trail to Bolinas on the east side of Highway 1. Close gaps for bikes through ranch lands in the park, including closing the Estero Trail loop, connecting Sir Francis Drake Blvd. with Pierce Point Road, and connecting Marshall Beach to Pierce Point Road, A more bike-friendly permit application process for road and mountain bike events in the park, including along Bolinas Ridge and out to the lighthouse. Bike access to all ranch roads in the pastoral zone that are already open to pedestrians.

#900

Name: Roberts, K

Correspondence: Please include improvements for ALL vulnerable road users, not just equestrians. I love horses, but that doesn't make me any safer on a bike. I would be very disappointed if you pitted these two groups against each other. There is plenty of room for us all to share. Don't leave us fighting over scraps. We need a plan that works for all of us. I fervently hope that is the ultimate outcome of this project.

#901

Name: Mellen , Leland

Correspondence: Please open more trails to mountain bikers. I share the opinion with MCBC Thanks

#902

Name: Alderson, George & Frances

Correspondence: Please consider this message as our comment on the forthcoming amendment to the general management plan for Point Reyes National Seashore. Although we live far from Point Reyes, I (George) have visited the area - first in 1952 before the national seashore was established, and again in 1979, when I visited Drakes Estero and the lighthouse.

We favor phasing out the domestic livestock operations, as planned in the 1962 law that established the national seashore. That law clearly designated the purposes of the national seashore: "purposes of public recreation, benefit, and inspiration." A later law established a limit for grandfathered livestock operations as 25 years or the life of the rancher, whichever was longer.

The proposal now being considered in Alternative B contemplates expanding the commercial activities to be allowed on the grandfathered ranches, including activities such as overnight lodgings, growing various crops, and raising other types of domestic livestock. Those were never envisioned in the authorizing legislation, nor in the grandfathering legislation. Apparently that proposal is being justified on grounds of "ranch operational flexibility and diversification." Such a concept has no basis in the laws Congress has enacted for Point Reyes. We believe the grandfathered activities are limited to dairy and beef cattle raising. If a ranch operation is no longer viable with the traditional activities, it should be phased out.

We favor keeping the Drakes Beach Tule Elk herd intact, and managing it under accepted principles of wildlife management, as practiced by the National Park Service in several other units of the National Park System. We are opposed to the removal of the Tule Elk herd as contemplated in Alternative C. It was reasonable to bring the Tule Elk to Point Reyes in 1970, at a time when the habitat and conditions for the elk in the San Joaquin Valley had deteriorated to the point where its survival was in question. It would be a terrible mistake to give a higher priority to cattle ranching than to the Tule Elk. In California at large, there is no shortage of cattle, and no shortage of lands suitable for raising cattle.

Thank you for considering our views.

#903

Name: Norstad, Mark

Correspondence: As a cyclist, I am in favor of the Marin County Bicycle Coalition's suggestions:

A new trail between Devil's Gulch and Platform Bridge through the Cheda, McIsaac, and Zanardi Ranches.

A plan to connect the Cross Marin Trail into Point Reyes.

Adoption of social trails off Bolinas Ridge for better connectivity and a single-track trail experience.

An extension of the Olema Valley Trail to Bolinas on the east side of Highway 1.

Gap closures for bikes through ranch lands in the park, including closing the Estero Trail loop, connecting Sir Francis Drake Blvd with Pierce Point Road, and connecting Marshall Beach to Pierce Point Road.

A more bike-friendly permit application process for road and mountain bike events in the park, including along Bolinas Ridge and out to the lighthouse.

Bike access to all ranch roads in the pastoral zone that are already open to pedestrians.

#904

Name: Kuchel, Andrew

Correspondence: I support MCBC in it's efforts to ensure equal, safe access for all user groups including the under-represented biking user group for use on the trails in the Non-Wilderness areas of the Pt Reyes National Seashore. For far too long, this legitimate, growing user group has been excluded (and discriminated against by other groups) from access to these areas of Public Land! It's time to recognize that this land belongs to everyone and should be shared equally and fairly. Here is a list of the trails and projects that I support: A new trail between Devil's Gulch and Platform Bridge through the Cheda, McIsaac, and Zanardi Ranches. A plan to connect the Cross Marin Trail into Point Reyes. Adoption of social trails off Bolinas Ridge for better connectivity and a single-track trail experience. Extend the Olema Valley Trail to Bolinas on the east side of Highway 1. Close gaps for bikes through ranch lands in the park, including closing the Estero Trail loop, connecting Sir Francis Drake Blvd. with Pierce Point Road, and connecting Marshall Beach to Pierce Point Road, A more bike-friendly permit application process for road and mountain bike events in the park, including along Bolinas Ridge and out to the lighthouse. Bike access to all ranch roads in the pastoral zone that are already open to pedestrians.

Andy

#905

Name: Edwards, Marc

Correspondence: Equestrians on their horses and their diesel trucks and trailers cause more damage than any other form of park users including cyclists if that was even an option for us. It's time to allow bikes more access particularly if it allows connectivity to other towns in West Marin.

#906

Name: Pfeifer, Nathan

Correspondence: I am writing to request improved bicycle access as part of the Action Alternatives being considered in the General Management Plan Amendment for Point Reyes National Seashore and the north district of Golden Gate National Recreation Area.

I am an avid cyclist and frequently ride roads and trails in Marin Co. Improved bike access is important to me, and I am often frustrated at the sometimes incomplete and illogical patchwork of bike access that effectively prevents use and enjoyment of some areas due a lack of logical and efficient through-routes, and connections to enable reasonable loop-routes.

I am supportive and appreciative of the efforts of Marin County Bicycle Coalition to improve bike access in the area during these limited opportunities when access policies are open to revision.

#907

Name: Falk, Fred

Correspondence: Dear Land Managers,

Please consider improved bicycle access as requested by the MCBC.

A new trail between Devil's Gulch and Platform Bridge through the Cheda, McIsaac, and Zanardi Ranches. A plan to connect the Cross Marin Trail into Point Reyes. Adoption of social trails off Bolinas Ridge for better connectivity and a single-track trail experience. Extend the Olema Valley Trail to Bolinas on the east side of Highway 1. Close gaps for bikes through ranch lands in the park, including closing the Estero Trail loop, connecting Sir Francis Drake Blvd. with Pierce Point Road, and connecting Marshall Beach to Pierce Point Road, A more bike-friendly permit application process for road and mountain bike events in the park, including along Bolinas Ridge and out to the lighthouse. Bike access to all ranch roads in the pastoral zone that are already open to pedestrians.

Thanks for your consideration,

Fred Falk

#908

Name: Hickey, Brendan

Correspondence: Folks,

Please preserve Marin's only wilderness area by rejecting the (well-organized and well-funded) petitions of the mountain biking community. • They do not represent the majority of park visitors - - most come to hike and escape the stresses of urban life • Their abuse of the license they enjoy on nearby Mt Tam is everywhere apparent and well-documented - - ignoring trail restrictions and speed limits, accelerating erosion and endangered-species habitat damage, knowing that enforcement is limited to nonexistent

We're relying on you to preserve the beauty of the park for generations to come.

Thank you, B

#909

Name: Stanley, Christopher

Correspondence: I would like to comment on MCBC's efforts to work with NPS to improve access for bikes in Pt. Reyes. This is a spectacular and large area of the coast with what appears to be plenty of space for all user groups to share. Whether shared use or even specific trails for mountain bikers seems to be much needed

There are plenty of opportunities to share that would be very welcome and would definitely bring myself and many others in the biking community to Pt. Reyes as well as to the nearby businesses more often. As it stands, with extremely little / no access to interesting trails in this area (where apparently horse riders..one of the smallest user groups maintains majority access) it has been an area that I have avoided (extremely beautiful, yet, extremely off limits to trail access).

There are by far more mountain bikers in the area and while I do feel that horse riders should have some tranquil no bike trails, it is also by far too far skewed towards horse owners (not exactly your average user group).

Please try to tune out the noise from Anti-Bikers and look at the information on numbers, trail impact (bikes do not do any more damage than horses) and lets find more ways to get more people out to this beautiful area.

Thank you Chris STanley (Mill Valley)

#910

Name: Cuviallo, Pat

Correspondence: it's time to update the Point Reyes management plan in keeping with the Park Service's mission to protect wildlife and the public's enjoyment of this area.

I'm opposed any killing or removal of tule elk.

I also 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 due to conflicts with native predators. It would likely lead to the killing of the park's bobcats, foxes, coyotes and birds.

I urge you to adopt Alternative E. This option would phase out dairy ranching in the park while allowing some beef ranching to continue. And it would not remove or kill any tule elk.

#911

Name: lewis, donald

Correspondence: IT'S TIME TO SHARE! Equal access to all. Allow more bike trails

#912

Name: Kramer, Ann

Correspondence: National Park Planning Members,

I was deeply saddened and disturbed to read about the planned euthanization of the Tule elk population at Point Reyes National Seashore. This park is a wildlife respite and refuge in a world which is growing increasingly scarce for birds and wildlife to live and thrive. I have visited this park and intend to visit yearly for it's beautiful spaces and wildlife.

Do we really need more dairy and cattle ranches? Isn't most of the West already being engulfed in our desire for meat and dairy and oil? I truly can't understand why you would consider any lethal means for population control

of the Elk, who bring such natural beauty to this park in order to increase this wildlife area for farming and ranching.

The proposed planting of row crops has the same effect, in my opinion. People don't visit a national park or seashore to see farmland and ranches. Those can be seen anywhere. They go to see wild areas, wild life, what's left of the world we have eliminated from so many places. How will the planting of row crops affect the wildlife? Will there nesting living area be demolished? Will they now be killed for eating something they haven't been informed is not intended for them?

The same is true for possible introduction of domestic animals such as chicken,oats, donkeys, lamb, sheep, and turkeys. This will only further put wildlife in conflict as they become despised predators in a place where they need to survive and will understandably predate on these animals.

I would like to see this place maintain it's natural beauty as a place to visit and enjoy the outdoors, the occasional owl or badger or bobcat, a place with hiking trails not ranches. How will this addition of ranches affect the balance of the park? Will they water be toxic for animals to drink from because of waste products? Will the smell increase for us visitors?

Please let California have the few remaining wild places in tact. We are already losing precious space with current federal policies. California has always been a leader in understanding the need to balance industry and development with a respect for the wild and the natural. Please keep it that way and do not introduce things which will destroy this park as a place for wild and beautiful things.

Sincerely, Ann Kramer

#913

Name: Syben, Gregor

Correspondence: I support MCBC in it's efforts to ensure equal, safe access for all user groups including the under-represented biking user group for use on the trails in the Non-Wilderness areas of the Pt Reyes National Seashore. For far too long, this legitimate, growing user group has been excluded (and discriminated against by other groups) from access to these areas of Public Land! It's time to recognize that this land belongs to everyone and should be shared equally and fairly. Here is a list of the trails and projects that I support: A new trail between Devil's Gulch and Platform Bridge through the Cheda, McIsaac, and Zanardi Ranches. A plan to connect the Cross Marin Trail into Point Reyes. Adoption of social trails off Bolinas Ridge for better connectivity and a single-track trail experience. Extend the Olema Valley Trail to Bolinas on the east side of Highway 1. Close gaps for bikes through ranch lands in the park, including closing the Estero Trail loop, connecting Sir Francis Drake Blvd. with Pierce Point Road, and connecting Marshall Beach to Pierce Point Road, A more bike-friendly permit application process for road and mountain bike events in the park, including along Bolinas Ridge and out to the lighthouse. Bike access to all ranch roads in the pastoral zone that are already open to pedestrians.

Sincerely,

Gregor Syben

#914

Name: Vulk, Marjorie

Correspondence: Keep trails open to Hikers and Equestrians in Pt. Reyes National Park. This Park has many mountainous, single track trails and sharing them with Bikers will endanger Hikers and Equestrians. The mind set of the Bikers is speed- -Bike Riders have abundant trails to ride, Please consider the safety of the Park and keep the trails safe for Hikers and Equestrians.

#915

Name: McDermott, Michael

Correspondence: I support MCBC in it's efforts to ensure equal, safe access for all user groups including the under-represented biking user group for use on the trails in the Non-Wilderness areas of the Pt Reyes National Seashore. For far too long, this legitimate, growing user group has been excluded (and discriminated against by other groups) from access to these areas of Public Land! It's time to recognize that this land belongs to everyone and should be shared equally and fairly. Here is a list of the trails and projects that I support: 1. A new trail between Devil's Gulch and Platform Bridge through the Cheda, McIsaac, and Zanardi Ranches. 2. A plan to connect the Cross Marin Trail into Point Reyes. 3. Adoption of social trails off Bolinas Ridge for better connectivity and a single-track trail experience. 4. Extend the Olema Valley Trail to Bolinas on the east side of Highway 1. 5. Close gaps for bikes through ranch lands in the park, including closing the Estero Trail loop, connecting Sir Francis Drake Blvd. with Pierce Point Road, and connecting Marshall Beach to Pierce Point Road, 6. A more bike-friendly permit application process for road and mountain bike events in the park, including along Bolinas Ridge and out to the lighthouse. Bike access to all ranch roads in the pastoral zone that are already open to pedestrians.

Thank you, Mike McDermott

#916

Name: Jensen, Marianne

Correspondence: I have been an avid hiker for the past 33 years on many of the trails in Marin County including Point Reyes National Park. On many of those trails, particularly on Mt. Tamalpais, where hikers share the trail with bikers, I have had the experience of needing to be constantly on the alert to be able to side step off the trail to let bicyclists get by. I am startled and dismayed to think that mountain biking access may now be extended to one of the crown jewels of Marin County, Pt.Reyes. Up until now hikers and horse riders have been able to access and experience Pt.Reyes trails without the intrusive traffic of mountain bikers. My hope is that you will deny the request to extend access to mountain bikers to Point Reyes. Thank you, Marianne Jensen

#917

Name: Rafello, Dean

Correspondence: Please go through with the described trails. Would make Marin an even better place to ride and enjoy.

#918

Name: Speraw, Andrea

Correspondence: I am a long-time resident of the Bay Area and have enjoyed the Point Reyes National Seashore my entire life. Two years ago I had the wonderful experience of witnessing the Tule Elk close-up while hiking. I vowed to help these animals thrive from that day forward.

I am greatly opposed to any kind of culling whatsoever. Why would we do this after spending so many years trying to bring them back from near extinction? This is a rare, native animal that thrives on our public land as wildlife should. If we don't protect them on our public land they have no chance to exist. We deplore the poaching of elephants in Africa but ignore the plight of our own precious wildlife, which contributes greatly to our ecosystems and our way of life that we all so love. If we cull there will be none left for our grandchildren to enjoy.

It is time to manage this land as it was meant to be managed - - with no private interests involved. I strongly support Alternative E. This option would phase out dairy ranching in the park while allowing some beef ranching to continue. And it would not remove or kill any tule elk.

The important thing is to make sure there's enough grass for the elk to eat and to reduce cattle numbers where lands are overgrazed or polluted. 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 ranching families retire.

Thank you for taking the time to read my comment.

Sincerely, Andrea Speraw

#919

Name: Davis, John

Correspondence: I'm an avid mountain biker and love the forest trails around the SF Bay Area. The mountain bike affords me the ability to visit these trails and provides mobility to me which I would otherwise be lacking, since hiking hurts me knees so badly.

I encourage you to open the trails in Point Reyes to mountain bikes, so all can enjoy our public lands.

Unfortunately, I heard that the Horse Council doesn't want to allow bikes. Their attitude is nothing less than pure selfishness. Those trails are a public asset, not to be hoarded by one group or another.

Please open the trails in Point Reyes to mountain bikes.

#920

Name: Muhanoff, Alex

Correspondence: I believe parks should not be used for ranching as adequate maintenance and preservation of natural resources of the vast acreage used in such a way are too difficult to attain and/or enforce and unavoidable degradation follows. Alternative F and more wildlife please! Thank you very much.

#921

Name: Schaefer, JD

Correspondence: I can see no more reason to allow bicycles on trails in Pt. Reyes than I can see a good reason to allow motorcycles, scooters or ATVs. They tear up the trails, they show arrogance on the trails I never experience from hikers.

Whenever I see bicyclists on clearly marked trails forbidding bicycles and I point it out, I get a "I didn't know that" or "I didn't see the sign". It's always delivered in a disenuous and dismissive fashion. I take their pictures and get a laugh with a comment that generally conveys the sentiment that no one will punish them so I should get over it.

The trails would exceed critical mass if bicycles were allowed.

#922

Name: Apton, Lola

Correspondence: I was shocked and dismayed to hear that Point Reyes may change their rules regarding mountain biking in this beautiful wilderness. I treasure hiking there regularly with a hiking club, and on my own with friends AND especially with any out of town visitors. A visit to Point Reyes National Seashore is a must on the itinerary. Friends from Israel and Germany have recently been treated to our National treasure. Mt. Biking will ruin the tranquility that is a hallmark of the Park. It's not fun to have to listen for speeding bicyclists who seem to relish the risks involved. I certainly hope this doesn't happen at Point Reyes. Thank you, Lola

#923

Name: Krsilchik-Ojeda, Paloma

Correspondence: Public access to bikes to help increase outdoor activities, stewardship programs and connection points for existing trails. More specifically:

- A new trail between Devil's Gulch and Platform Bridge through the Cheda, McIsaac, and Zanardi Ranches.
- A plan to connect the Cross Marin Trail into Point Reyes.
- Adoption of social trails off Bolinas Ridge for better connectivity and a single-track trail experience.
- An extension of the Olema Valley Trail to Bolinas on the east side of Highway 1.
- Gap closures for bikes through ranch lands in the park, including closing the Estero Trail loop, connecting Sir Francis Drake Blvd with Pierce Point Road, and connecting Marshall Beach to Pierce Point Road.
- A more bike-friendly permit application process for road and mountain bike events in the park, including along Bolinas Ridge and out to the lighthouse.
- Bike access to all ranch roads in the pastoral zone that are already open to pedestrians.

Cyclists have a long history of being involved in stewardship and preservation programs for our lands and yet we have the highest restriction to access, where other activities dont.

Please consider this access as we have continuously supported programs to allow access to the lands.

Thank you,

Paloma Krasilchik-Ojeda

#924

Name: N/A, N/A

Correspondence: Please open more trails to bicycles in Pt Reyes National Park. Specifically:

A new trail between Devil's Gulch and Platform Bridge through the Cheda, McIsaac, and Zanardi Ranches.

A plan to connect the Cross Marin Trail into Point Reyes.

Adoption of social trails off Bolinas Ridge for better connectivity and a single-track trail experience.

An extension of the Olema Valley Trail to Bolinas on the east side of Highway 1.

Gap closures for bikes through ranch lands in the park, including closing the Estero Trail loop, connecting Sir Francis Drake Blvd with Pierce Point Road, and connecting Marshall Beach to Pierce Point Road.

A more bike-friendly permit application process for road and mountain bike events in the park, including along Bolinas Ridge and out to the lighthouse.

Bike access to all ranch roads in the pastoral zone that are already open to pedestrians.

#925

Name: McInerny, Austin

Correspondence: As the President of the National Interscholastic Cycling Association (NICA), I am a strong proponent of efforts and organizations that work to get youth outdoors. One such organization, the NorCal High School Cycling League, which is a member league of NICA, serves approximately 1,300 teenage student-athletes in the northern California region and many of these students attend schools within riding distance of the Pt. Reyes National Seashore. As such, NICA, the NorCal League and I personally are in favor of efforts to improve existing multi-use trails and create new opportunities for responsible trail users.

NICA's goal is to turn mountain biking into a traditional interscholastic sport like baseball and football. Cycling is a life-long sport that helps individuals build strong bodies, mind and character. Our society needs more activities and programs that help youth get outside. The process of discovering and exploring natural environments helps adolescents learn vitally important lessons about themselves and their role in the larger communities in which they live. Having been involved with our program for the past fifteen years, I can attest to the significant positive impact our programs are having in Northern California and, particularly, the communities in the immediate vicinity of the Pt. Reyes National Seashore.

To this end, I write to express our strong support for the inclusion of trail opportunities that focus on loop routes, connectivity with adjacent public lands, and facilitation of north-south connectivity across the landscape under review in the Environmental Impact Statement (EIS) for a General Management Plan Amendment (GMP Amendment) for Point Reyes National Seashore and the north district of Golden Gate National Recreation Area. Moreover, we are strong supporters of the following specific recreational amenities:

- 1) A new trail between Devil's Gulch and Platform Bridge through the Cheda, McIsaac, and Zanardi Ranches;
- 2) A plan to connect the Cross Marin Trail into Point Reyes;
- 3) Adoption of social trails off Bolinas Ridge for better connectivity and a single-track trail experience;
- 4) Extend the Olema Valley Trail to Bolinas on the east side of Highway 1;
- 5) Close gaps for bikes through ranch lands in the park, including closing the Estero Trail loop, connecting Sir Francis Drake Blvd. with Pierce Point Road, and connecting Marshall Beach to Pierce Point Road;
- 6) A more bike-friendly permit application process for road and mountain bike events in the park, including along Bolinas Ridge and out to the lighthouse; and
- 7) Bike access to all ranch roads in the pastoral zone that are already open to pedestrians.

As a youth development organization, our goal is to help create the next generation of active trail stewards and advocates for public land protection and enjoyment. To achieve this goal, we need opportunities to get teenagers outside and physically active on public lands. By undertaking the list of improvements listed above, we will be able to help instill an environmental ethic and approach to shared use of public lands that will benefit society long into the future. We will also be able to increase the safety of all trail users by dispersing use and removing the risk inherent in riding bikes along busy roads.

#926

Name: donegan, tom

Correspondence: support MCBC in it's efforts to ensure equal, safe access for all user groups including the under-represented biking user group for use on the trails in the Non-Wilderness areas of the Pt Reyes National Seashore. For far too long, this legitimate, growing user group has been excluded (and discriminated against by other groups) from access to these areas of Public Land! It's time to recognize that this land belongs to everyone and should be shared equally and fairly. Here is a list of the trails and projects that I support: A new trail between Devil's Gulch and Platform Bridge through the Cheda, McIsaac, and Zanardi Ranches. A plan to connect the Cross Marin Trail into Point Reyes. Adoption of social trails off Bolinas Ridge for better connectivity and a single-track trail experience. Extend the Olema Valley Trail to Bolinas on the east side of Highway 1. Close gaps for bikes through ranch lands in the park, including closing the Estero Trail loop, connecting Sir Francis Drake Blvd. with Pierce Point Road, and connecting Marshall Beach to Pierce Point Road, A more bike-friendly permit application

process for road and mountain bike events in the park, including along Bolinas Ridge and out to the lighthouse. Bike access to all ranch roads in the pastoral zone that are already open to pedestrians.

Thank you,

#927

Name: Drucker, Ben

Correspondence: Hi there,

I'm reaching out in support of expanded bicycle access in Pt. Reyes, as requested by the Marin County Bicycle Coalition. I am a regular visitor to the park and ride almost entirely on the road from San Francisco. People like me gain increased enjoyment and take a car off the roads by riding through the Pt. Reyes seashore instead of driving.

Riding on the road to the lighthouse, Limantour Beach, or Pierce Point Ranch is partially spoiled by heavy traffic and aggressive driving behavior, especially on weekends. In the limited places I can ride off road, I've had nothing but courteous and pleasant encounters with hikers.

Equestrian access serves a fractional segment of park visitors and I'm frustrated to hear that the Horse Council stands opposed to shared access. Visitors on horseback already have disproportionate access to sensitive trails and the proposed changes do not affect this access.

Thank you,

Ben

#928

Name: Jackson, Eric

Correspondence: I strongly support Marin County Bicycle Coalition's call for:

A new trail between Devil's Gulch and Platform Bridge through the Cheda, McIsaac, and Zanardi Ranches.

A plan to connect the Cross Marin Trail into Point Reyes.

Adoption of social trails off Bolinas Ridge for better connectivity and a single-track trail experience.

An extension of the Olema Valley Trail to Bolinas on the east side of Highway 1.

Gap closures for bikes through ranch lands in the park, including closing the Estero Trail loop, connecting Sir Francis Drake Blvd with Pierce Point Road, and connecting Marshall Beach to Pierce Point Road.

A more bike-friendly permit application process for road and mountain bike events in the park, including along Bolinas Ridge and out to the lighthouse.

Bike access to all ranch roads in the pastoral zone that are already open to pedestrians.

Bikes have no access to the Wilderness Area, and we're asking for none!

All the best, Eric Jackson

#929

Name: Flaherty, Kevin

Correspondence: Dear NPS,

I have spent a lot of time riding my bike in Marin County and want to visit Inverness and Point Reyes Station with my family - I have two two year old twins. Marin County Bicycle Coalition has made amazing strides with the eastern portion of my route (White's Hill in Fairfax area) but the section of my route to Point Reyes that has been the biggest problem is Sir Francis Drake and Route One Highways. The MCBC has made some really good suggestions to this EIS Public Scoping but the Horse Council has engaged in a campaign of disinformation that seems in bad faith.

I believe that there is a lot of scope for providing access to Pt Reyes seashore and other wildlands to cyclists and the MCBC's proposals are some of the best options out there. I can certainly vouch for their contention that some of the range lands that other users currently have access to can be minimally augmented to allow for cycling as well.

Kevin Flaherty San Francisco

#930

Name: Randel, Haley

Correspondence: Bike access needs improvement! This is especially crucial in the Point Reyes area. It is dangerous in many places where there aren't legal trails or bike friendly routes. It is unfair that cyclist don't get the same safety while enjoying the beautiful place we live in. Cyclists deserve the same protections as pedestrians and equestrians.

#931

Name: raub, sonja

Correspondence: 1. I believe existing, operational ranches should be converted and transitioned to natural habitat AFTER an owner dies or retires and his/her family does not wish to continue to operate a ranch.

2. I believe the following alternative action and goal should be assessed by the NPS by adding it to the current, multiple alternative management plan NPS has already created and is considering:

Retire and convert all of the ranches in the short- and long-term to be natural habitat. They would no longer function as operational ranches. This action would ensure the entire Pt. Reyes National Seashore land holdings are consistent with the act that created PRNS and, thus, uphold the National Park Service's mission.

3. Based on #2, above, successful execution of this option would ensure that PRNS joins other lands throughout the USA as a member of America's natural legacy - and, in so doing, native flora and fauna will thrive, with visitors able to enjoy America's diverse, precious splendor.

#932

Name: Smyth, Patricia

Correspondence: I am in Mendocino County and Me and my friends camp and ride our horses at Point Reyes at least twice a year. Many of my friends from Sonoma County ride their horses once a week in Point Reyes. Please keep horse access to trails at Point Reyes! Thank you, Patricia Smyth

#933

Name: Smith, Geoffrey

Correspondence: Dear NPS,

I'm writing to support improved bicycle access to leased lands in the Pt. Reyes National Seashore. There is an amazing network of trails in place but many are closed to bikes or lead to one way "in and out" routes. It would be great if we could open especially old fire roads (but some single track as well) to increase the connectivity through this region to the growing number of bikers. Importantly, this is a diverse population of users, with growing popularity thanks to hybrid type bikes and a growing fear of car behavior in marin. Specifically, I support A new trail between Devil's Gulch and Platform Bridge through the Cheda, McIsaac, and Zanardi Ranches. A plan to connect the Cross Marin Trail into Point Reyes. Adoption of social trails off Bolinas Ridge for better connectivity and a single-track trail experience. Extend the Olema Valley Trail to Bolinas on the east side of Highway 1. Close gaps for bikes through ranch lands in the park, including closing the Estero Trail loop, connecting Sir Francis Drake Blvd. with Pierce Point Road, and connecting Marshall Beach to Pierce Point Road, A more bike-friendly permit application process for road and mountain bike events in the park, including along Bolinas Ridge and out to the lighthouse. Bike access to all ranch roads in the pastoral zone that are already open to pedestrians.

Thanks for your consideration,

Geoff Smith regular PRNS user

#934

Name: N/A, N/A

Correspondence: I hope that we can encourage more people to ride bikes! Biking is good for the body, good for the mind, and good for the environment. Opening more access to already existing roads would make the trail/gravel riding more available and safer; persons traveling on these connected trails could avoid riding on the paved, high traffic roads, which would make riding safer for a wider group of people including families with children who can't always be trusted to maintain the focus and steady inline riding that is necessary when traveling by bike on roads where cars are in abundance. The more folks we can get out there riding for exercise and entertainment, the more chance they may choose to ride for transportation and that would be a benefit to the whole population. Let's not restrict an activity that bring joy and health to so many of our residents, instead let's encourage more people to get out there and enjoy the great outdoors!

#935

Name: N/A, N/A

Correspondence: Hello,

I appreciate you taking public comment as part of your process, thank you! I'm a life long resident of Marin County in my 30's, health and fitness professional, and avid outdoor recreation enthusiast. I hike, bike, run, and treasure the rich outdoor experiences the area provides.

I prefer to leave my car at home for a multitude of reasons regardless of if I am choosing to bike, hike, or run, or on occasion get to ride horseback. I believe you are working towards something that can benefit all visitors in that off-road access to many areas by bicycle, especially ones which interface with adjacent public lands could be increased and improved.

Although I first encountered this public comment opportunity from an unrelated source, I've learned the MCBC has proposed a few specific ideas and processes that do seem sound and beneficial for the public and multiple use groups even beyond cyclists alone. I support what they are proposing and hope to see even further advancements along similar lines to land access.

There's a wonderful historic photo I saw in a public facebook group "lost marin" of a handful of 19th century residents that appeared to be a family exploring the Point Reyes National Sea Shore area by bicycle. If and when one day I have children I hope access to these wonderful trails and outdoor spaces at their all-time best as far as sensible bicycle access, so I am able to share with them the best and most evolved version of what my parents did with me, and what I've seen in photo's from even before my grandparents time.

Thank you,

Marin County Resident

#936

Name: Haagen-Smit, Jim

Correspondence: Please provide more trails accessible by bike in the park. Both narrow singletrack trails and open all dirt roads that are open to hikers to bikes.

Please include a plan to connect the Cross Marin Trail into Point Reyes.

Extend the Olema Valley Trail to Bolinas on the east side of Highway 1.

A new trail between Devil's Gulch and Platform Bridge through the Cheda, McIsaac, and Zanardi Ranches.

Adoption of social trails off Bolinas Ridge for better connectivity and a single-track trail experience.

Close gaps for bikes through ranch lands in the park, including the Estero Trail loop, connecting Sir Francis Drake Blvd. with Pierce Point Road, and connecting Marshall Beach to Pierce Point Road.

A more bike-friendly permit application process for road and mountain bike events in the park, including along Bolinas Ridge and out to the lighthouse.

#937

Name: Meckfessel, Thomas

Correspondence: I am an avid Mt biker and have lived in Pt Reyes for over 30 years. I strongly support increased access for bikes in the National Seashore and I have always felt that bikes should be allowed wherever horses are. I realize that that wish will most likely not happen but a few more trails to ride would be a great start.

#938

Name: N/A, N/A

Correspondence: Please more trails in Point Reyes...Open them to hikers, bikers and horses!

#939

Name: Lyons, Steven

Correspondence: I'd like more bike access in Pt. Reyes National Seashore. Specifically, I agree with the access items that's Marin County Bicycle Coalition has outlined:

A new trail between Devil's Gulch and Platform Bridge through the Cheda, McIsaac, and Zanardi Ranches.

A plan to connect the Cross Marin Trail into Point Reyes.

Adoption of social trails off Bolinas Ridge for better connectivity and a single-track trail experience.

An extension of the Olema Valley Trail to Bolinas on the east side of Highway 1.

Gap closures for bikes through ranch lands in the park, including closing the Estero Trail loop, connecting Sir Francis Drake Blvd with Pierce Point Road, and connecting Marshall Beach to Pierce Point Road.

A more bike-friendly permit application process for road and mountain bike events in the park, including along Bolinas Ridge and out to the lighthouse.

Bike access to all ranch roads in the pastoral zone that are already open to pedestrians.

Thanks, Steven Lyons

#940

Name: Page, Erik

Correspondence: Please consider the following in your plans:

A new trail between Devil's Gulch and Platform Bridge through the Cheda, McIsaac, and Zanardi Ranches.

A plan to connect the Cross Marin Trail into Point Reyes.

Adoption of social trails off Bolinas Ridge for better connectivity and a single-track trail experience.

Extend the Olema Valley Trail to Bolinas on the east side of Highway 1.

Close gaps for bikes through ranch lands in the park, including closing the Estero Trail loop, connecting Sir Francis Drake Blvd. with Pierce Point Road, and connecting Marshall Beach to Pierce Point Road,

A more bike-friendly permit application process for road and mountain bike events in the park, including along Bolinas Ridge and out to the lighthouse.

Bike access to all ranch roads in the pastoral zone that are already open to pedestrians.

#941

Name: N/A, N/A

Correspondence: I would like to support the following projects in Marin County, CA:

A new trail between Devil's Gulch and Platform Bridge through the Cheda, McIsaac, and Zanardi Ranches.

A plan to connect the Cross Marin Trail into Point Reyes.

Adoption of social trails off Bolinas Ridge for better connectivity and a single-track trail experience.

Extend the Olema Valley Trail to Bolinas on the east side of Highway 1.

Close gaps for bikes through ranch lands in the park, including closing the Estero Trail loop, connecting Sir Francis Drake Blvd. with Pierce Point Road, and connecting Marshall Beach to Pierce Point Road,

A more bike-friendly permit application process for road and mountain bike events in the park, including along Bolinas Ridge and out to the lighthouse.

Bike access to all ranch roads in the pastoral zone that are already open to pedestrians.

#942

Name: Hanzel, David

Correspondence: A trail between Devil's Gulch and Platform Bridge through the Cheda, McIsaac, and Zanardi Ranches.

Connect the Cross Marin Trail into Point Reyes.

More trails off Bolinas Ridge.

Extend the Olema Valley Trail to Bolinas on the east side of Highway 1.

#943

Name: Schneider, Lee

Correspondence: I fully support the plans under consideration to improve and expand bicycling access in Pt. Reyes National Seashore.

#944

Name: hamil, tim

Correspondence: TO WHOM THIS CONCERNS: NATIONAL PARK SERVICE Obviously the ranches need to fix their fences, c/o NPS. KEEP THE REMAINING ELK FREE RANGE ! DON'T CAPTURE/HARM THE ELK TO EITHER RELOCATE/STERILIZE/KILL !!! *We know about the herds of 250 that died from lack of water after being fenced in by NPS. *We know about the massive amount of white deer that were shot by the NPS.

**A singular freak incident of an Elk harming a Cow, is not enough reason, nor is Elks eating the cows grass !!

#945

Name: N/A, Al

Correspondence: As a long time resident of Sonoma and Marin counties and reaching my later years I would like to request and support the following use for Mountain bikes and class 1 bikes to provide access and mobility to the land

A new trail between Devil's Gulch and Platform Bridge through the Cheda, McIsaac, and Zanardi Ranches.

A plan to connect the Cross Marin Trail into Point Reyes.

Adoption of social trails off Bolinas Ridge for better connectivity and a single-track trail experience.

An extension of the Olema Valley Trail to Bolinas on the east side of Highway 1.

Gap closures for bikes through ranch lands in the park, including closing the Estero Trail loop, connecting Sir Francis Drake Blvd with Pierce Point Road, and connecting Marshall Beach to Pierce Point Road.

A more bike-friendly permit application process for road and mountain bike events in the park, including along Bolinas Ridge and out to the lighthouse.

Bike access to all ranch roads in the pastoral zone that are already open to pedestrians.

Respectfully yours,

Al Sonntag

#946

Name: Valentino, N/A

Correspondence: I support the separation of Tule Elk from the dairies and ranches in the Seashore.

#947

Name: Cole, Christine

Correspondence: I have a life of agriculture, but do not agree with the Public Lands being leased to ranchers who then dictate the future of the elk that are native to that land. As per the Notice of Intent post October 31, 2018, "The Drakes Beach free-range tule elk herd would be managed at a level compatible with authorized ranching operations." This is not wise. You do not hand the key to the safe to those whose own best interest is served if you want to keep anything in the safe! Please rethink this.

#948

Name: Ashcraft, Kyle

Correspondence: I'm writing in support of increased trail access for mountain bikes. The dramatic underrepresentation of this user group in terms of trail access is a huge weakness in the integrity of the park. As a taxpayer-funded establishment, it should be of utmost importance that the access to recreation in the park represents the needs and wants of the people paying for it. Beyond that, the obvious social impact that increased mountain bike access brings to the community should make increased access an easy sell. If it weren't for wealthy interest groups suing land managers and spreading misinformation about mountain biking, I believe this would no longer be an issue.

#949

Name: clapp, edward

Correspondence: Given the behavior of bikers on Mt Tam, a minority but one that's too large, would be likely to cause problems for hikers and riders. Anecdotally, I and friends have felt unsafe on fire roads because of biker behavior. As for actual injury, I have a friend who needed over 30 stitches to repair the result of a biker losing control and hitting her and I was present just after the incident in which a woman was thrown off the 680 trail a few years ago. I only heard her side of the story as the biker left the scene of an accident, leaving an injured person.

To quote someone in a Marin IJ article on that matter, "While most of them are polite and well-behaved, there are enough renegades to make it scary for walkers."

Bikers also cause damage on multi-use trails in the Headlands. And, that minority again, cause more on single track trails they're forbidden to use. Is this a concern for Pt Reyes, on both counts: will the legal trails be subject to increased erosion and will opening them up encourage use of trails bikes aren't supposed to be on?

Personally, I'm ambivalent about horses - I love them and recognize the historical significance of their presence but have seen too much trail damage caused by them. On the other hand, they aren't prone to careening around corners at high speed and don't make at least me apprehensive.

Please consult with Mt Tam State Park, MMWD, and MCOSD rangers for informed opinions.

#950

Name: Cameron, Amy

Correspondence: I strongly support MCBC's request for improved trail access for bikes in Pt Reyes. As a road and trail rider, I have a great appreciation for the beautiful outdoor areas of Marin. I firmly believe that bikes and horses can share trails in a respectful way. My fellow riders and I always slow way down, stop and have friendly conversations with those on horses and I hope to be able to do this on even more trails. Thanks!

#951

Name: Barry, Kevin

Correspondence: I support MCBC in it's efforts to ensure equal, safe access for all user groups including the under-represented biking user group for use on the trails in the Non-Wilderness areas of the Pt Reyes National Seashore. For far too long, this legitimate, growing user group has been excluded (and discriminated against by other groups) from access to these areas of Public Land! It's time to recognize that this land belongs to everyone and should be shared equally and fairly. Here is a list of the trails and projects that I support: A new trail between Devil's Gulch and Platform Bridge through the Cheda, McIsaac, and Zanardi Ranches. A plan to connect the Cross Marin Trail into Point Reyes. Adoption of social trails off Bolinas Ridge for better connectivity and a single-track trail experience. Extend the Olema Valley Trail to Bolinas on the east side of Highway 1. Close gaps for bikes through ranch lands in the park, including closing the Estero Trail loop, connecting Sir Francis Drake Blvd. with Pierce Point Road, and connecting Marshall Beach to Pierce Point Road, A more bike-friendly permit application process for road and mountain bike events in the park, including along Bolinas Ridge and out to the lighthouse. Bike access to all ranch roads in the pastoral zone that are already open to pedestrians.

Thank you, Kevin Barry

#952

Name: Reed, Matt

Correspondence: The Bay Area is the home to mountain biking, yet there are precious few trail options available to riders because many trails remain closed to bikes.

It is my understanding, the National Park Service is performing a review of its leased land management practices as they may pertain to Pt. Reyes State Park.

I would like to offer the following suggestions for consideration:

1. A new trail between Devil's Gulch and Platform Bridge through Cheda, McIsaac and Zanardi Ranch.
2. A plan to connect the Cross Marin Trail into Point Reyes.
3. Adoption of social trails off Bolinas Ridge for better connectivity and a single-track trail experience.
4. Extend the Olema Valley Trail to Bolinas on the east side of Highway 1.
5. Close gaps for bikes through ranch lands in the park, including closing the Estero Trail loop, connecting Sir Francis Drake Blvd. with Pierce Point Road and connecting Marshall Beach to Pierce Point Road,
6. A more bike-friendly permit application process for road and mountain bike events in the park, including along Bolinas Ridge and out to the lighthouse.

7. Bike access to all ranch roads in the pastoral zone that are already open to pedestrians.

Best regards, Matt Reed

#953

Name: Sears, Norman

Correspondence: I support all mountain bikers in their efforts to ensure equal, safe access for all user groups including the under-represented biking user group for use on the trails in the Non-Wilderness areas of the Pt Reyes National Seashore. For far too long, this legitimate, growing user group has been excluded (and discriminated against by other groups) from access to these areas of Public Land! It's time to recognize that this land belongs to everyone and should be shared equally and fairly. Here is a list of the trails and projects that I fully support: 1. A new trail between Devil's Gulch and Platform Bridge through the Cheda, McIsaac, and Zanardi Ranches. 2. A plan to connect the Cross Marin Trail into Point Reyes. 3. Adoption of social trails off Bolinas Ridge for better connectivity and a single-track trail experience. 4. Extend the Olema Valley Trail to Bolinas on the east side of Highway 1. 5. Close gaps for bikes through ranch lands in the park, including closing the Estero Trail loop, connecting Sir Francis Drake Blvd. with Pierce Point Road, and connecting Marshall Beach to Pierce Point Road, 6. A more bike-friendly permit application process for road and mountain bike events in the park, including along Bolinas Ridge and out to the lighthouse. 7. Bike access to all ranch roads in the pastoral zone that are already open to pedestrians.

Thank you,

Norman W. Sears

#954

Name: Smoot, Todd

Correspondence: I am in favor of the No Ranching and Expansion of the Tule Elk Alternative. The goal of the NPS in the Point Reyes Olema Valley area should be to return it to wilderness.

#955

Name: Reed, Violet

Correspondence: The Bay Area is the home to mountain biking, yet there are precious few trail options available to riders because many trails remain closed to bikes.

It is my understanding the National Park Service is performing a review of its leased land management practices as they may pertain to Pt. Reyes State Park.

I would like to offer the following suggestions for consideration:

1. A new trail between Devil's Gulch and Platform Bridge through Cheda, McIsaac and Zanardi Ranch.
2. A plan to connect the Cross Marin Trail into Point Reyes.
3. Adoption of social trails off Bolinas Ridge for better connectivity and a single-track trail experience.
4. Extend the Olema Valley Trail to Bolinas on the east side of Highway 1.
5. Close gaps for bikes through ranch lands in the park, including closing the Estero Trail loop, connecting Sir Francis Drake Blvd. with Pierce Point Road and connecting Marshall Beach to Pierce Point Road,

6. A more bike-friendly permit application process for road and mountain bike events in the park, including along Bolinas Ridge and out to the lighthouse.

7. Bike access to all ranch roads in the pastoral zone that are already open to pedestrians.

Best regards, Violet Reed

#956

Name: Miller, Marilyn

Correspondence: "In wildness is the preservation of the world." So said Henry David Thoreau over 160 years ago, and it is true and necessary to act on now more than ever. Congress authorized wilderness areas to be protected and preserved as naturally as possible, with no mechanized incursions. The National Park Service is entrusted with this mission. I am opposed to allowing bicycles to be used in wilderness areas in any National Park Service unit. In Marin County, including Point Reyes National Seashore, bicyclists already have access to 75% of the area trails. Day hikers, backpackers, and horse riders are looking for a quiet nature experience on the spectacular, mystical trails of Point Reyes National Seashore. This type of experience is getting harder and harder to find in our busy world and should be all the more protected from interest group pressures. Please do not cave in to pressure from the bicycle lobby. They will always want more and more and will never be satisfied. All we want is to keep the wilderness as natural as possible, with access to the natural beauty of Point Reyes' trails on foot, whether hiking boot or hoof, as it has always been and as Congress intended.

#957

Name: Williams, Roger

Correspondence: I want to encourage the Park to maintain wilderness protections as they are, and not to allow further access to mountain bikers within Pt Reyes National Seashore.

Part of the wilderness experience for hikers, such as myself, is the ability to walk trails without bikers shouting "on your left" as they fly past on trails. Most of Marin is open to mountain bikers; we don't need more access for bikers in Point Reyes.

#958

Name: Fineren, Larell

Correspondence: I am thrilled that the historic ranches, both dairy and cattle ranches, will be allowed to remain as part of the park. Preserving cultural history is as important to me as preserving natural history in the park. The park is not a zoo. It should reflect the ongoing integration of both human and wildlife activities over time. Thank you. I love this park and visit it regularly.

#959

Name: Linn, Anne

Correspondence: Re: EIS Public Scoping Documents

Regarding the various alternatives to park planning regarding ranching, limited ranching and no ranching in Point Reyes National Seashore, I reluctantly support Alternative F, no ranching.

Many of the current ranches are dirty eye sores, poorly maintained and environmentally negligent. I grew up in a dairy community and later lived and worked on a cattle, corn silage, beet and cattle operation in Colorado. We would never let our operations degrade to the extent that is obvious in existing ranches when driving through the Seashore. It is difficult to understand why the Park Service supports Alternate B, with 20 year leases to existing poorly managed dairy and cattle operators.

The tule elk herds are unique and doing well. Bring them back to the peninsula, along with other species that do not coexist well with the current ranching operations.

Thank you for giving me the opportunity to express my opinion.

Sincerely, Anne Linn Planning Commissioner City of Goleta, California

#960

Name: Matthews, Mac

Correspondence: Improved bike access in Marin is important to me. There are not that many places that allow mountain bikes in the bay area. By expanding the trails in Marin (the birthplace of mountain biking) it would help create tourism opportunities as well as just fun.

Please allow proceed with the MCBC plan outlined **HERE'S WHAT WE'VE ASKED FOR, ON YOUR BEHALF:**
A new trail between Devil's Gulch and Platform Bridge through the Cheda, McIsaac, and Zanardi Ranches.

A plan to connect the Cross Marin Trail into Point Reyes.

Adoption of social trails off Bolinas Ridge for better connectivity and a single-track trail experience.

An extension of the Olema Valley Trail to Bolinas on the east side of Highway 1.

Gap closures for bikes through ranch lands in the park, including closing the Estero Trail loop, connecting Sir Francis Drake Blvd with Pierce Point Road, and connecting Marshall Beach to Pierce Point Road.

A more bike-friendly permit application process for road and mountain bike events in the park, including along Bolinas Ridge and out to the lighthouse.

Bike access to all ranch roads in the pastoral zone that are already open to pedestrians.

#961

Name: Allen, Jim

Correspondence: I would like more area to ride my Mtn. bike in Pt. Reyes. I have lived in Marin County my whole life, over 60 years. There are a very large number of trails and fire road/ ranch road in the GGNRA that are closed to Mtn. bikes. More area to ride would help spread bikes out. This will make the area more enjoyable for all users.
Jim

#962

Name: Adams, Matt

Correspondence: I am in full support of the trail projects supported by the Marin County Bicycle Coalition. It's time to expand where people can ride and provide access to the beauty of the Pt Reyes lands. Those projects are:

A new trail between Devil's Gulch and Platform Bridge through the Cheda, McIsaac, and Zanardi Ranches.

A plan to connect the Cross Marin Trail into Point Reyes.

Adoption of social trails off Bolinas Ridge for better connectivity and a single-track trail experience.

An extension of the Olema Valley Trail to Bolinas on the east side of Highway 1.

Gap closures for bikes through ranch lands in the park, including closing the Estero Trail loop, connecting Sir Francis Drake Blvd with Pierce Point Road, and connecting Marshall Beach to Pierce Point Road.

A more bike-friendly permit application process for road and mountain bike events in the park, including along Bolinas Ridge and out to the lighthouse.

Bike access to all ranch roads in the pastoral zone that are already open to pedestrians.

Thank you.

#963

Name: Gensler, Steve

Correspondence: I support MCBC in it's efforts to ensure equal, safe access for all user groups including the under-represented biking user group for use on the trails in the Non-Wilderness areas of the Pt Reyes National Seashore. For far too long, this legitimate, growing user group has been excluded (and discriminated against by other groups) from access to these areas of Public Land! It's time to recognize that this land belongs to everyone and should be shared equally and fairly. Here is a list of the trails and projects that I support: A new trail between Devil's Gulch and Platform Bridge through the Cheda, McIsaac, and Zanardi Ranches. A plan to connect the Cross Marin Trail into Point Reyes. Adoption of social trails off Bolinas Ridge for better connectivity and a single-track trail experience. Extend the Olema Valley Trail to Bolinas on the east side of Highway 1. Close gaps for bikes through ranch lands in the park, including closing the Estero Trail loop, connecting Sir Francis Drake Blvd. with Pierce Point Road, and connecting Marshall Beach to Pierce Point Road, A more bike-friendly permit application process for road and mountain bike events in the park, including along Bolinas Ridge and out to the lighthouse. Bike access to all ranch roads in the pastoral zone that are already open to pedestrians.

Thank you, Steve

#964

Name: BAIRD, MARIAH

Correspondence: I am opposed to any expansion of off-road bicycle access in Pt. Reyes National Seashore. I hike regularly at Pt. Reyes, and other locations in Marin. In my experience, bicycle access in a wilderness area degrades the quiet enjoyment of the environment, and disturbs wildlife. Off-road riders speed by in noisy groups, and are often aggressive. Bicycles damage trails and sensitive habitat. There is already extensive off-road access for bicycles in many areas of Marin. Expansion of access in Pt. Reyes is unnecessary.

#965

Name: N/A, N/A

Correspondence: Please expand bicycle access to Pt Reyes. Providing more offroad opportunities will save lives! Thank you.

#966

Name: Becker, Chuck

Correspondence: Please consider providing additional access to mountain bikers. We live here and love the area and want to be able to participate safely and legally in the sports we like, not just the equestrians.

Thank you

#967

Name: WACHTEL, LAURA

Correspondence: I am concerned about the plan to interfere with the elk population of Pt. Reyes Nat'l Park. While I am appreciative of these ranchers for utilizing free-range management of their cattle and I would like them to thrive, I worry that the proposed methods are purely financially-motivated and not in line with how we expect our national parks to be managed. Especially considering the near-decline of the elk population in this area years ago, should they not now be allowed to thrive in peace? If this was private land I might still have an opinion; the fact that it is public land makes this particularly disturbing.

Please consider less invasive options for the cattle/elk issue.

Thank you.

#968

Name: Sanders, Jason

Correspondence: To the National Park Service.

It is time for you to open up access for bikes on your trails. I am asking for the following: Everything the Marin County Bicycle Coalition has asked for on my behalf.

A new trail between Devil's Gulch and Platform Bridge through the Cheda, McIsaac, and Zanardi Ranches. A plan to connect the Cross Marin Trail into Point Reyes. Adoption of social trails off Bolinas Ridge for better connectivity and a single-track trail experience. An extension of the Olema Valley Trail to Bolinas on the east side of Highway. Gap closures for bikes through ranch lands in the park, including closing the Estero Trail loop, connecting Sir Francis Drake Blvd with Pierce Point Road, and connecting Marshall Beach to Pierce Point Road. A more bike-friendly permit application process for road and mountain bike events in the park, including along Bolinas Ridge and out to the lighthouse. Bike access to all ranch roads in the pastoral zone that are already open to pedestrians.

I pay my taxes that fund the National Park Service. I have an equal right to access the land and should not be singled out because I ride bikes. Thanks

#969

Name: Pope, Matt

Correspondence: Hello, I support increased bike access to public lands in Point Reyes. My wife, kids, and I are frequent visitors from San Anselmo to Point Reyes and enjoy hiking, the beautiful beaches, and riding our bikes together. We are in favor of increased bike access especially to single track trails. We also support the specific proposals of the Marin County Bike Coalition as set forth below.

A new trail between Devil's Gulch and Platform Bridge through the Cheda, McIsaac, and Zanardi Ranches.

A plan to connect the Cross Marin Trail into Point Reyes.

Adoption of social trails off Bolinas Ridge for better connectivity and a single-track trail experience.

An extension of the Olema Valley Trail to Bolinas on the east side of Highway 1.

Gap closures for bikes through ranch lands in the park, including closing the Estero Trail loop, connecting Sir Francis Drake Blvd with Pierce Point Road, and connecting Marshall Beach to Pierce Point Road.

A more bike-friendly permit application process for road and mountain bike events in the park, including along Bolinas Ridge and out to the lighthouse.

Bike access to all ranch roads in the pastoral zone that are already open to pedestrians.

Best regards, Matt Pope

#970

Name: Binney, Frank

Correspondence: I would prefer Alternative 3: Reduced Ranching. I like that this alternative would preserve historic family ranches while freeing up approximately 7,500 acres for wildlife habitat and visitor enjoyment. General comments on both the Seashore's preferred alternative and Alt 3: -Elk vs agricultural impacts should be addressed primarily via financial means, (e.g. reduced lease fees, damage reimbursements), and habitat enhancement before resorting to removal. -Determination of optimal elk populations in ag lands should take into account the historic abundance of tule elk on those lands pre-ranching and the limited habitat remaining for this native species in California -Study potential wildlife impacts and allow public input prior to authorizing any agricultural diversification. For example, do poultry operations with guardian dogs result in loss of predator habitat in the Seashore? Or does silage tilling adversely affect wintering burrowing owls and other wildlife? - Create a new trail or trails in the pastoral zone to allow the visiting public to better experience and appreciate these working public landscapes

#971

Name: Wilson, Patricia

Correspondence: I am very concerned about the fate of the Tule Elk at Point Reyes National Seashore. I live 30 minutes from the main entrance and have spent hundreds of peaceful hours enjoying the hiking trails at PRNS. It is particularly joyful when you are hiking or biking along and happen upon wildlife that one does not normally see in one's town. A fox, snake or banana slug are among the many creatures that make the one feel more in touch with nature and this is very important in our rush-around busy lives that most of us lead. I have a particularly fond memory of my first encounter with a Tule elk. I was parked near Muddy Hollow and one walk right past my car as I was just about to get out. I had no idea how large they were and it was just a very awe inspiring thing. I am quite upset to hear that the Tule elk may not only be removed from PRNS, but killed. The park service needs to make protection of native wildlife a priority over ranching and farming. Commercial ranching at PRNS was supposed to be only temporary. I support fazing out dairy ranching all together and keeping the Tule elk where they belong.

#972

Name: Wilcox, Nathan

Correspondence: I am writing to support expanding trails/access for mountain biking in the non-wilderness areas of Pt. Reyes.

In particular, I would like to voice support for: a new trail between Devil's Gulch and Platform Bridge through the Chead, McIsaac, and Zanardi ranches a plan/extension to connect the Cross Marin Trail into Point Reyes adopting social trails off Bolinas Ridge to allow single-track riding. extending the Olema Valley Trail to Bolinas, east of Hwy 1 closing gaps for bikes through ranch lands in the park (including closing the Estero Trail loop, connecting Sir Francis Drake Blvd w/ Pierce Point Road, and connecting Marshall Beach to Pierce Point Rd) making the permitting process more amenable for scheduling road and mountain bike events in the park (including Bolinas Ridge and out to the lighthouse) bike access to all ranch roads in the pastoral zone that are currently open to pedestrians.

Thanks,

Nathan

#973

Name: Cantor, Sierra

Correspondence: I would like to see a policy that allows for continued grazing leases with the caveat that the livestock producers work with the elk and other native species without active native animal herd-size management. Survival and persistence of native species should have precedence over livestock.

#974

Name: Voss, Rene

Correspondence: First, 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 in Point Reyes than on nearby private lands. Current dairies in Marin County outside of Pt. Reyes are struggling. Dairy farms 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.

Second, the Park Service should not allow the culling of Tule Elk in Pt. Reyes National Seashore. Instead, as is the case in most of our other National Parks, the elk should be allowed to freely roam the park and populate it based on the forces of nature without interference from managers or ranchers.

Third, the ranching operations have become a modern unsightly industrial blight, blocking the public's access and use, degrading lands and waters, and limiting our management options. They hardly resemble the 19th century ranches that earned cultural and historical designations. In addition to phasing out ranching at Pt. Reyes, the Park Service should remove all non-historic structures in the park and restore those areas.

Finally, I urge the park service to fully analyze and eventually select an alternative similar 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, consistent with its original intent and the Park Service's mission.

Thank you,

Rene Voss

#975

Name: Phillips, Stefanie

Correspondence: Bike trails are important to me. I hope you open the trails in point Reyes as they are very few places for me to ride, I support national park service - I hope you will support me.

#976

Name: Beebe, Jess

Correspondence: As a California Naturalist and a longtime fan of Point Reyes National Seashore, I'd like to register my concerns about some aspects of the proposal: 1. Allowing ranchers to plant crops will completely eliminate access to the land for the public as well as put native animals at risk. 2. The allowing of chickens, goats, sheep, etc. will inevitably bring in conflicts with coyotes, bobcats, and other predators. 3. Killing native elk to make way for cattle makes no sense at all. I understand that ranching is a key part of the history of Point Reyes National Seashore and that the future of the park depends on a good relationship between ranchers and people whose primary concern is conservation. However, I do not see these two things as necessarily being in conflict. Point Reyes is a totally unique habitat and ecosystem that deserves to be protected, without the unnecessary harmful impact of more intensive agriculture than we currently have. Thank you for your consideration. Jess Beebe

#977

Name: Ragghianti, Steve

Correspondence: I support MCBC in it's efforts to ensure equal, safe access for all user groups including the under-represented biking user group for use on the trails in the Non-Wilderness areas of the Pt Reyes National Seashore.

For far too long, this legitimate, growing user group has been excluded (and discriminated against by other groups) from access to these areas of Public Land!

Now is the time to recognize that this land belongs to everyone and should be shared equally and fairly.

Here is a list of the trails and projects that I support:

A new trail between Devil's Gulch and Platform Bridge through the Cheda, McIsaac, and Zanardi Ranches.

A plan to connect the Cross Marin Trail into Point Reyes. Adoption of social trails off Bolinas Ridge for better connectivity and a single-track trail experience.

Extend the Olema Valley Trail to Bolinas on the east side of Highway 1.

Close gaps for bikes through ranch lands in the park, including closing the Estero Trail loop, connecting Sir Francis Drake Blvd. with Pierce Point Road, and connecting Marshall Beach to Pierce Point Road,

A more bike-friendly permit application process for road and mountain bike events in the park, including along Bolinas Ridge and out to the lighthouse.

Bike access to all ranch roads in the pastoral zone that are already open to pedestrians.

Sincerely,

Steve Ragghianti

#978

Name: Bartolini, Mark

Correspondence: I write to comment in regard to the 2018-11 EIS Public Scoping documents on the future of ranching in the Point Reyes National Seashore (PRNS). I am a Marin native, descendant (on my mother's side) of a Spaniard who was a California pioneer, past Executive Director of the Point Reyes National Seashore Association (PRNSA), and over 30-year resident of Inverness. My home borders the park.

First I would like to recognize the essential role that ranchers played in creating the Point Reyes National Seashore. Their story is an inspiring one that PRNSA was proud to highlight through the support of books and a film describing this history.

Today their descendants, and those who work on these ranches, are valued members of our small West Marin Community carrying on the traditions of their forebears. I am not unsympathetic to the economic challenges they face, nor what must seem to them, a frustrating labyrinth of regulations that present significant challenges to the ongoing economic viability of their businesses.

But I am also cognizant that when their parents and grandparents sold their ranches at fair market value to the Federal government they knew they were relinquishing both ownership and management of their lands to the National Park Service. True, they knew they would be able to continue to ranch- -but contrary to what some have asserted- -this promise did not extend further than the lifetimes of the original sellers.

Nearly sixty years on, the decision to continue to permit ranching within the park has become very much a political one with myriad legal tentacles pointing in different directions. On the one hand, you have the NPS' originating legislation which establishes in the Organic Act a dual mandate to conserve park resources and to provide for their use and enjoyment in such a manner and by such means as will leave them unimpaired for future generations. 16 U.S.C. § 1. There is no reference to or preference for private commercial enterprises. Both the GGNRA and the PRNS have authorizing language that neither mandates nor precludes ranching within the park. Subsequent amendments have tended to steer the parks more in line to the mandate described in the Organic Act.

But the most recent Congressional intervention, H.R. 6687 authored and introduced by Congressman Jared Huffman, is a full frontal attack on the long-standing mandate of the NPS to prioritize the protection of wildlife and biodiversity over commercial activity. The bill would mandate the Secretary of the Interior to expand existing leases and prioritize the commercial success of these enterprises over the welfare of wildlife, biodiversity, and public enjoyment of these lands. Congressman Huffman has said this legislation would not affect the current public scoping process- -but that is patently untrue. Whatever the NPS determines through the scoping process that is contrary to Huffman's Bill, such as his call to allow for hunting of Elk in the park, would be mandated by the Interior Secretary if the legislation becomes law. Huffman's intervention is a gross overreach of his representative role that is dismissive not only of his many constituents who have participated in this scoping process but also the overriding values that govern our national parks. Our National Parks, "America's Best Idea," were not conceived as a way to promote and subsidize private businesses, nor to allow for the hunting and killing of native wildlife (Tule Elk are native to Point Reyes) that compete with privately held businesses for park resources.

While I would like to see an accommodation consistent with NPS values that allow for these leases to continue- -it should not be at the expense of impairing the park's wildlife, biodiversity or public enjoyment. These values must take precedence.

I fear that the leaseholders, in demanding that their businesses be given priority may win a battle in this current political environment but lose the war by engendering public hostility through putting their own interests over those of the general public who own the park. Their alliance with politicians such as the bill's co-sponsor Congressman Rob Bishop, R Utah who with a lifetime rating of 2% by the League of Conservation Voters has consistently voted against attempts to address climate change, voted for offshore oil drilling and opposed the Endangered Species Act demonstrates just how extreme this bill is and how low some ranching proponents are

willing to go to achieve their ends. I urge the park to continue to allow free-ranging herds of Tule Elk and to reject any call to kill Elk or allow hunting within park boundaries. I would also argue against calls that ranchers be allowed to diversify their activities. The position taken by ranchers, that their businesses interests should take precedence over wildlife and park resources, demonstrates why diversification would be a slippery slope. How long before ranchers and their supporters are calling for coyotes or mountain lions to be exterminated because they are killing chickens or trampling/consuming crops?

For those ranchers who determine their ranches are no longer economically viable but would like to remain living on park property, the park could consider an ROU or lifetime lease if their use of the property was restricted to providing commercial accommodations for park visitors. Such accommodation would address concerns about the negative environmental impacts of ranching on park lands while also providing the second generation of ranching families with a "soft exit."

If the park can work out a resolution with the existing ranch leaseholders that is consistent with its management obligations under the Organic Act then- -and only then- -should lease terms for existing (not diversified) operations be extended. But it should be clear that scientific analysis of the impacts from ranching must be conducted to determine their impact on biodiversity and the public's right to access and enjoy these lands. These are the management priorities that should be paramount- -not the economic interests of privately owned businesses who were paid for their land and have enjoyed taxpayer-funded subsidies for nearly sixty years.

I want to conclude by saying that I know my position may be contrary to some in the local community who support ranching and the area's vaunted organic food movement. To these, I say that this is a national not a local or state park. We have an obligation to ensure that it is managed in a way that is consistent with the ethos of our national park system for the benefit of this and future generations of all Americans.

On that point, I would like to close by recounting one of the most rewarding aspects of my time as Director of PRNSA that I hope will illustrate the importance of this park to the wider community. Thousands of school-age children attended PRNSA led environmental education programs at the park's Clem Miller Education Center. Many of them were from disadvantaged communities attending on scholarships. Some were newly arrived refugees for whom the concept of public ownership of property was novel. Many of them had never visited the ocean, walked barefoot on a beach or viewed wildlife up close. We introduced them to "leave no trace" backpacking, tide pooling, marine mammals, Tule Elk and myriad other features of the park. They dined on local organic food generously provided by several local ranches (both within and outside the park).

While I have no doubt they fondly remember the food, it was their intimate encounter with nature that in many cases proved transformational. Some of them returned every summer for years and their teachers and parents conveyed heartwrenching stories of how their experience at Point Reyes had positively impacted their academic progress and psychological well being.

I have read proponents of ranching in the park derisively refer to the "romanticism" of those who advocate for a park with wilderness areas and abundant wildlife so close to a major urban center. But at this time of near-apocalyptic conditions in our state with climate change driving more frequent and more dangerous fires, altering our ocean conditions and threatening the lives and health of millions, we need our parks more than ever to be places of refuge, inspiration, and transformation. It may well be romantic to try and reclaim the biodiversity this sliver of northward moving land supported prior to my Spanish ancestor's arrival nearly two hundred years ago; but at the least, we owe it to the next generation to pass it on unimpaired.

#979

Name: McClain, Anne

Correspondence: For the most part I don't support commercial activity beyond recreation and visitor services in our national parks however I feel differently about the ranches in the Pt. Reyes National Seashore. I have lived very close to the park for 42 years so I know it intimately and have an understanding of its history. As I understand it the park was established as a partnership between citizens concerned that this area would be overrun by development and ranchers who were afraid development would squeeze them out and force them off their ranches. As a partnership, we got a beautiful park and the ranchers were able to continue ranching. I believe that the intent of the legislation creating the park was that the ranchers and their descendants would be able to continue ranching. I believe that we need to honor this agreement with the ranchers and allow ranching to continue in Pt. Reyes National Seashore.

#980

Name: Craig, Anthony

Correspondence: I support MCBC in it's efforts to ensure equal, safe access for all user groups including the under-represented biking user group for use on the trails in the Non-Wilderness areas of the Pt Reyes National Seashore. For far too long, this legitimate, growing user group has been excluded (and discriminated against by other groups) from access to these areas of Public Land! It's time to recognize that this land belongs to everyone and should be shared equally and fairly. Here is a list of the trails and projects that I support: A new trail between Devil's Gulch and Platform Bridge through the Cheda, McIsaac, and Zanardi Ranches. A plan to connect the Cross Marin Trail into Point Reyes. Adoption of social trails off Bolinas Ridge for better connectivity and a single-track trail experience. Extend the Olema Valley Trail to Bolinas on the east side of Highway 1. Close gaps for bikes through ranch lands in the park, including closing the Estero Trail loop, connecting Sir Francis Drake Blvd. with Pierce Point Road, and connecting Marshall Beach to Pierce Point Road, A more bike-friendly permit application process for road and mountain bike events in the park, including along Bolinas Ridge and out to the lighthouse. Bike access to all ranch roads in the pastoral zone that are already open to pedestrians.

#981

Name: Durrie, Mike

Correspondence: PRNS might well continue ranching (cattle, dairy) as long as the practices are managed by the ranchers and supervised by the park to ensure that the natural resources are treated with care, and public access and enjoyment are a real priority. Expansion of activities should not be allowed. If appropriate environmental activities are too expensive (e.g. elk access to ranch lands), PRNS could adjust rent to cover costs. Goal is a health environment and not making money off the ranches.

Ranches are a nice bit of history, keep the brush down, but are not the reason for the national seashore. We should not get confused as to why the park is there ... for all of us and our visitors to experience its beauty and as much wildness as we can sustain.

Mike Durrie

#982

Name: Sweeney, John

Correspondence: As a twenty-year homeowner in Marin County and a recent retiree from The Presidio Trust, I was happy to hear of your upcoming review of leased land management practices of the Pt. Reyes National Seashore. The GGNRA is a treasure and I am dedicated to the support of access for all user groups and, with respect to bicycle access, I am very supportive of the NPS objectives related to increased bicycle access outlined in the scoping document. I'm a life long off-road cyclist and have enjoyed the open spaces of the current GGNRA since my childhood in the 1960's. My specific desires/ recommendations are as follows:

-Adopt the existing social trails from Bolinas Ridge down to Highway 1. This would be primarily administrative and would not require new trail construction.

-Extend Olema Valley trail to Bolinas on the east side of Highway 1. For off-road cyclists this would allow a much safer connective route to Bolinas Fairfax Rd. and Shoreline Highway toward Stinson Beach. Much of this trail already exists.

-Establish a new trail between Devil's Gulch and Platform bridge through the ranches of Zanardi, McIsaac and Cheda. This would enhance the North-South route connectivity in this area.

-Connect the Cross Marin trail into Pt. Reyes. Currently the Jewell trail accomplishes some of this but that route does not provide an off-road connection into Pt. Reyes.

-Establish a trail connection from Marshall Beach up to Pierce Point Rd. and one from Pierce Point Rd. to Sir Francis Drake Rd. This would provide loop trail opportunities to visitors in that section of the park.

-Make the permit process for bicycle events in the park less antagonistic and cumbersome. Events bring together people that might not otherwise feel comfortable exploring the park on their own.

-Allow bicycle access on all ranch roads currently open to pedestrians. This is purely administrative.

I'd be happy to help as the scoping process moves forward and thanks for your continued stewardship of our wonderful parklands. I do not support bicycle access to designated wilderness areas.

#983

Name: MC TAGGART, DOREY

Correspondence: TO IMAGINE THE POINT REYES NATIONAL SEASHORE INVADED BY THE MARIN BICYCLE COALITION, COULD BE CONSIDERED A SACRILEGE TO THE NATURAL BEAUTY TO WHICH TOURISTS AND RESIDENTS-NATURE LOVERS-HAVE BECOME ACCUSTOMED., PLEASE SEE WHAT HAS HAPPENED AT WHITE'S HILL, TO THE DEEP CREVICES IN THE TRAILS, TO THE SCREECHING OF BIKE TIRES AS THE TWO-WHEELED JACK RABBITS ZIP AROUND CORNERS. SEE, ALSO, THE PLAYGROUND OF HILLS AND JUMPS THAT THE BIKE COALITION HAS CREATED THERE. PLEASE DO NOT DESTROY THE SERENITY AND THE PRISTINE GROUNDS OF OUR NATIONAL PARK. THANK YOU.

#984

Name: Mallory, Ron

Correspondence: My wife and I live near the Point Reyes National Seashore, and we are active hikers and nature watchers there. We think having ranching in PRNS is a fine use of some of the land, however, many of the ranching practices badly degrade the environment and need to be cleaned up, monitored and habitat needs to be restored. We are definitely not in support of additional ranching practices diversification in the park. We feel that the Tule Elk should be allowed to live mostly freely on the land, and we're against the killing of elk to reduce numbers unless absolutely no other solution is available. We are certainly in favor of any trail improvements and expansion, and habitat restoration. Thank you for allowing public comment regarding this important matter. Sincerely, Ron Mallory

#985

Name: Kashuba, David

Correspondence: Please increase cycling access in Pt. Reyes National Seashore.

Thank you, David Kashuba

#986

Name: MC TAGGART, DORSEY

Correspondence: OULD BE CONS THE POINT REYES NATIONAL SEASHORE INVADED BY THE MARIN BICYCLE COALITION WOULD BE A SACRILEGE. TO THE NATURAL BEAUTY TO WHICH TOURISTS AND RESIDENTS-NATURE LOVERS-HAVE BECOME ACCUSTOMED WOULD BE DESTROYED., PLEASE SEE WHAT HAS HAPPENED AT WHITE'S HILL, FROM THE DEEP CREVICES IN THE TRAILS, TO THE SCREECHING OF BIKE TIRES AS THE TWO-WHEELED JACK RABBITS ZIP AROUND CORNERS. SEE, ALSO, THE PLAYGROUND OF HILLS AND JUMPS THAT THE BIKE COALITION HAS CREATED THERE. PLEASE DO NOT ALLOW THE SERENITY AND THE PRISTINE GROUNDS OF OUR NATIONAL PARK.TO BE DESTROYED. THANK YOU.

#987

Name: MC TAGGART, DORSEY

Correspondence: THE POINT REYES NATIONAL SEASHORE BEING INVADED BY THE MARIN BICYCLE COALITION WOULD BE A SACRILEGE. TO THE NATURAL BEAUTY TO WHICH TOURISTS AND RESIDENTS-NATURE LOVERS-HAVE BECOME ACCUSTOMED. PLEASE SEE WHAT HAS HAPPENED AT WHITE'S HILL, FROM THE DEEP CREVICES IN THE TRAILS, TO THE SCREECHING OF BIKE TIRES AS THE TWO-WHEELED JACK RABBITS ZIP AROUND CORNERS. SEE, ALSO, THE PLAYGROUND OF HILLS AND JUMPS THAT THE BIKE COALITION HAS CREATED THERE. HIKERS WHO KNOW WHAT HAPPENS AT WHITE HILL ON WEEKENDS PARTICULARLY NO LONGER GO THERE. PLEASE DO NOT ALLOW THE SERENITY AND THE PRISTINE GROUNDS OF OUR NATIONAL PARK.TO BE DESTROYED. THANK YOU.

#988

Name: Campe, Pamela

Correspondence: Dear Superintendent Muldoon,

Jim and I have been Inverness residents since 1971. We are steadfast in our support for the Park, ranching, and dairy farming. We strongly urge the Park to issue 20 year (minimum) leases as affirmed in Congressman Huffman's bill HR 6687. Longterm leases support the viability of ranching by allowing investments in infrastructure and resource management.

We urge the EIS to address the economic and community impacts on the schools, students, teachers, families, and surrounding communities. Without the critical mass of the ranches and all their related businesses, schools and businesses could fold which would mean loss of jobs, accessible education, and beyond.

We hope the EIS will address management ideas to improve the environmental sustainability of the ranches, dairies, as well as elk management alternatives. We are concerned about the management techniques of the elk as they cause serious problems for the ranchers, but also hikers. Can the Park Service prevent additional herds from establishing as well as seriously culling existing herds?

We end with this quote from 2007 NPS publication: "Stewardship Begins With People" , a publication from National Park Service U.S. Department of the Interior, Conservation Study Institute, number 14, 2007. "The Point Reyes peninsula has long been associated with the early history of dairy farming in California...A number of the

ranches in the park's pastoral zone have been in continuous operation since the 1860s....Here is a place that can reconnect people with their natural heritage through wilderness and recreational experiences as well as with the food they eat, the beauty of the cultural landscapes where it is grown, and the honorable labor of producing it." (The article also addressed the fact that the historic ranches produce 20% of the milk for the bay area)

Sincere regards, Pamela and Jim Campe

#989

Name: Kelly, Brian

Correspondence:

I support MCBC in it's efforts to ensure equal, safe access for all user groups including the under-represented biking user group for use on the trails in the Non-Wilderness areas of the Pt Reyes National Seashore. For far too long, this legitimate, growing user group has been excluded (and discriminated against by other groups) from access to these areas of Public Land! It's time to recognize that this land belongs to everyone and should be shared equally and fairly. Here is a list of the trails and projects that I support: A new trail between Devil's Gulch and Platform Bridge through the Cheda, McIsaac, and Zanardi Ranches. A plan to connect the Cross Marin Trail into Point Reyes. Adoption of social trails off Bolinas Ridge for better connectivity and a single-track trail experience. Extend the Olema Valley Trail to Bolinas on the east side of Highway 1. Close gaps for bikes through ranch lands in the park, including closing the Estero Trail loop, connecting Sir Francis Drake Blvd. with Pierce Point Road, and connecting Marshall Beach to Pierce Point Road, A more bike-friendly permit application process for road and mountain bike events in the park, including along Bolinas Ridge and out to the lighthouse. Bike access to all ranch roads in the pastoral zone that are already open to pedestrians

#990

Name: Rehder, Karen

Correspondence: Please give access to mountain bikes. The park is UNDERUTILIZED.

Charge them to ride bikes and charge the equestrians as well. This money could go to trail maintenance.

Happy Trails Karen

#991

Name: Rowland, Cameron

Correspondence: I know there are plenty of biking trails already open in the park. I'd like voice my comment to limit any further development or expansion of biking trails. Just not enough room to include hikers, too much impact on the environment, they tend to also act rude on offensive, acting as if everyone else needs to heed to them.

Thank you,

Cameron Rowland

#992

Name: Flora, Travis

Correspondence: Please keep the elk in the park. They should have higher priority than cattle.

#993

Name: Malaspina, James

Correspondence: It is critical for the future support of National Parks to include and expand Mountain Biking access to the trail systems. Providing the majority of access to hikers and equestrians significantly limits National Parks ability to expand its support base at a time when the park system needs to grow. The belief that biking will negatively impact trails or the ecosystem have been proven wrong. What will occur is a greater number of advocates from the biking communities will become more engaged in improving the trails and parks and everyones experience.

#994

Name: Rogers, Daryl

Correspondence: As a avid lover of the Marin open spaces I would love to have access to the same trails that my family and I hike in Point Reyes by bicycle as well. Many other shared outdoor spaces in the Bay Area are welcoming to hikers, equestrians, and bicycles. Let's encourage more cooperation and develop a plan so that all of these recreational types can enjoy the same trails.

Thank you! Daryl Rogers

#995

Name: Reule, Linda

Correspondence: I love to visit Point Reyes. It is one of my most important stops on my visit to California. I find these public lands and seashore to be an unique ecosystem and grazing range for native animals in the area. I think we need to ensure the safety of the Tule Elk instead of trying to find ways to destroy their existence. I believe they need their space to roam and not be caged to allow large numbers of the heard to die. I believe in the mission of the park service and the need to protect the native wildlife. I adamantly oppose Bill H.R. 6687. Thank you.

#996

Name: Rodi, Christopher

Correspondence: To Whom It May Concern- Access to the beautiful area in which we live and play is one of the reasons we pay a premium to live, support, and protect our environment. It is time for the parks to reflect the growing desire of bicyclists to safely and legally enjoy the same trails that hikers and horse back riders take for granted. Why can't we adopt sharing approaches that so many other locations have negotiated. To me it suggests a failure of creativity as well as a failure of the stewards of our open space. After all, not everyone can afford a horse to ride!

#997

Name: N/A, N/A

Correspondence: I believe strongly that the NPS should prioritize protection of the natural habitats within the planning area and the entire Point Reyes National Seashore. This includes the diverse native plant and animal species (including the elk), the increasingly rare and threatened Coastal prairie, our estuaries and tidal wetlands. Having lived adjacent to the park for 30 years, and having lived within the Park and the planning area, I support better management of ranches and over-visitation that unfortunately threaten these natural habitats and communities.

#998

Name: Molinari, Guy

Correspondence: I support our farmers and Huffman's bill, HR 6687, and to extend the agricultural leases by 20 years.

#999

Name: Van Allen, Michael

Correspondence: Trail access, much less fire-road access, has been limited in Point Reyes for far to long for no good reason. The NIMBY-ism of hikers and equestrians is self-serving and based on misinformation and lacks good evidence to continue the current limitations.

Access to existing fire-roads, new trails and connecting trails will expose so many more people to the wonders and beauty of Pt. Reyes.

As a coach for the Tam High Mountain Bike Team we are limited in the places we can take our riders for practice events. I'd love to A more bike-friendly permit application process for road and mountain bike events in the park, including along Bolinas Ridge and out to the lighthouse. The kids on our team have no idea what amazing trails are out there on Tam, much less Pt. Reyes. More access would be a huge win for building awareness about our local natural resources at an early age and building passion for protecting them.

At a BARE MINIMUM we should immediately grant bike access to all ranch roads in the pastoral zone that are already open to pedestrians.

THANK YOU MCBC for taking the lead on this!

#1000

Name: Gan, Theresa

Correspondence: I am writing to address the issue of mountain bikers gaining more access to trails in the Pt. Reyes area. I am an avid hiker and don't mind sharing the trail with bicycles on wide trails where safety isn't an issue but many times find myself having to share the trail with reckless bikers. The presence of aggressive bikers are increasing on hiking trails causing stressful situations for hikers. A lot of the trails at Pt. Reyes are overgrown with poison oak which makes it difficult to get off the trail for bikers. I agree that bikers should have access to some trails but don't think that Pt. Reyes is an appropriate area for increased bicycles.

Thank you.

Theresa

#1001

Name: Solotar, Robert

Correspondence: I understand that this General Management Plan Amendment is primarily focussed on determining the appropriate management strategies for the ranch and agricultural lands within the National Seashore and the appropriate management strategy for the Drakes Beach tule elk herd. This should be the focus of the EIS.

I also understand there are groups trying to use this General Management Plan Amendment as an opportunity to provide greater access for bicycles within the National Seashore and to build new trails to accommodate their use. With very limited exceptions, the General Management Plan Amendment and the EIS should not expand its focus to include either major new trail proposals or opening up new areas of the National Seashore to bicycle use. However, consideration of ways to connect existing trails open to bicycle use, including connecting Sir Francis Drake Blvd. with Pierce Point Road, and connecting the Cross Marin Trail into Point Reyes, would be appropriate.

#1002

Name: N/A, N/A

Correspondence: I object to granting mountain biker rights to use hiking trails in Pt Reyes National Seashore (PRNS). The bikes will erode the trails. From my experience, while many of the mountain bikers are considerate, there invariably will be a significant number who are rude and even aggressive in not slowing down much less yield when they encounter hikers. Allowing mountain bikes on the trails will degrade my enjoyment of hiking the PRNS trails.

#1003

Name: Morin-Leisk, Jeanne

Correspondence: I would love to see some more trail access for mountain bikes. Additionally, a more bike-friendly permit application process for road and mountain bike events in the park, including along Bolinas Ridge and out to the lighthouse. Specifically, bike access to all ranch roads in the pastoral zone that are already open to pedestrians would be a nice way to include more opportunities for additional community use of those trails.

#1004

Name: Kenton, Chris

Correspondence: As a local parent and a high school coach, I want to voice my strong support for MCBC, and their efforts to win fair and equitable access for mountain bikes to non-wilderness area trails in the Pt Reyes National Seashore. Over the past few years, mountain biking has grown to be one of the most vibrant sports in high schools across the country. Kids are joining in droves because it is a challenging and rewarding sport, with a strong community built around a love for the outdoors. We should be encouraging these kids to be out on our trails, not locking them out. We have a zero tolerance policy for team members riding illegal trails, which by and large our members respect. They volunteer hundreds of hours a year to trail work and outreach to the community, hosting rides and clinics for younger riders, and participating in programs like Tails and Trails to build ties with the horse riding community. These kids are the future stewards of our forests and seashores, in fact, many of them are already participating in sustainable trail and environmental leadership programs. There are many, many successful examples of sustainable mountain biking trails. We should be modeling for these kids, and the world, how optimize a program of sustainable and equitable access for a place like Pt Reyes National Seashore.

#1005

Name: Coyle, Hugh

Correspondence: Hello -

I write to share my thoughts about opening access to Pt. Reyes trails and adjacent lands to mountain bikes.

I've lived in the Bay Area for 22 years and have been a mountain biker since well before I arrived. I was immediately a fan of Mt. Tam and have enjoyed all of its connecting trails, from Muir Beach and the Marin Headlands to the south, and Stinson, Bon Tempe, Lake Lagunitas and Bolinas Ridge to the north.

As much as we all love the solitude of nature, I always offer a greeting to others who are enjoying the trails, whether they are on bike, horseback or foot. If mountain biking, I always dismount and walk my bike when I encounter someone on horseback, out of courtesy as well as self-preservation. I encounter equestrians so infrequently on all of these trails (v. hikers and other mountain bikers), so it has always surprised me that so many of Marin's amazing trails - trails perfectly capable of handling multi-use activity - are closed to bikes but open to equestrians. With the growth of mountain biking here in Marin, we (including equestrians and hikers) all need to find new areas to share more trails, and expanding and granting multi-use access to everyone in Pt. Reyes makes perfect sense.

It is an absolute blessing to live in Marin and enjoy the outdoors in all ways, shapes and forms. We moved to Marin from San Francisco to raise three sons (now 6, 7 & 8 years old) and I would like to help them explore new trails in amazing places like Pt. Reyes. All I ask is that we (NPS and all stakeholders) design common sense solutions to provide long overdue, equal access to mountain bikers in Pt. Reyes as is afforded to equestrians and hikers.

Thank you,

Hugh Coyle

#1006

Name: Uring, Karen

Correspondence: The bicycle coalition is pushing to have access to all the trails in Point Reyes. This SHOULD NOT BE GRANTED! Bicyclists have already destroyed one of the scenic trails on Mt Tam, i.e. the Coastal View trail. It is a complete disaster, with huge bike holes and ruts, which make walking on the trail impossible. In fact hikers can not use it for these reasons.

There are other trails on Mt Tam that have been equally harmed (some on Dias Ridge), and show major signs of severe erosion(loss of plants, grass to hold water), just bare eroded soil with ruts and gashes from bike tires. When will this stop??? Surely you will not let this rambunctious group destroy Point Reyes! And I havn't even mentioned the danger to hikers, walkers and other park users with bikers racing around the trails and narrow roads.

Thanks for your consideration, Karen

#1007

Name: Rucker, Catherine

Correspondence: Although they were "required by the Agreement," Alternatives E and F must be eliminated - because they would conflict with Public Law 87-657 (1962) (The Act that established the Pointe Reyes National Seashore) and Public Law 95-625, "The National Parks and Recreation Act of 1978" (1978). Alternative E would eliminate "Dairy Ranching" and Alternative F would eliminate (Cattle) Ranching.

In Public Law 87-657, the federal government required:

No parcel of more than five hundred acres within the zone ... shall be acquired without the consent of the owner so long as it remains in its natural state, or is used exclusively for ranching and dairying purposes... The term "ranching and dairying purposes", as used herein, means such ranching and dairying, primarily for hte productions of food, as is presently practiced in the area.

In acquiring access roads within the pastoral zone, the Secretary shall give due consideration to existing ranching and dairying uses and shall not unnecessarily interfere with or damage such use.

With Public Law 87-657, Congress and the President clearly stated that existing ranching and dairying were to continue within the Point Reyes National Seashore.

In Public Law 95-625, the federal government required:

Where appropriate in the discretion of the Secretary, he or she may lease federally owned land ... which has been acquired by the Secretary under this Act, 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 this Act. Any land to be leased by the Secretary under this section shall be offered first for such lease to the person who owned such land or was a leaseholder thereon immediately before its acquisition by the United States.

...

The term "agricultural property" as used in this Act means lands which were in regular use for, or were being converted to agricultural, ranching, or dairying purposes as of May 1, 1978...

With Public Law 95-625, the federal government restated its intent for cattle ranching and dairy farming to continue within the Point Reyes National Seashore.

Lastly, HR 6687 (Huffman), which supports continued cattle ranching and dairy farming, has passed the House of Representatives. And if a local "Management Plan" decides to eliminate cattle ranching or dairy farming, the decision is likely to be overruled by Congress and the President of the United States (who is a proponent of agribusiness).

As a result, Alternatives E & F must be eliminated.

#1008

Name: Beardslee, Greg

Correspondence: Park Superintendent,

I really like the trail connections and improvements proposed to improve visitor experience. I think public trail opportunities yield the most return from our investments. Expanding visitor facilities by using previously used areas, ranch roads and old historic buildings shows common sense.

I support alternative B which would continue ranching and elk management. I think the interrelationship of ranching and nature is what gives Pt. Reyes it's best qualities.

I look forward to visiting the Park and bringing my bicycle. With certain mobility issues I find that riding my mountain bike gives me the freedom to get around.

Greg Beardslee Bozeman, MT

#1009

Name: DeSilver, Albert

Correspondence: Dear GGNRA & Point Reyes Sea Shore Administrators,

First of all thank you so much for your work and great service protecting our AMAZING natural areas. I am a twenty five year resident of Marin, an avid hiker and mountain biker. I recreate in these areas on a WEEKLY basis and would love to see MORE recognized access for mountain bikers through out these areas of Point Reyes, Bolinas Ridge, and the area ranches that share GGNRA jurisdiction.

Mountain biking has grown much in popularity and now represents your second largest user group at around 40%. Unfortunately new mountain bike opportunities in Point Reyes Seashore and on GGNRA lands has been absent. It is time to review current connectivity gaps and loop opportunities for mountain biking. All improvements for mountain biking can also be shared with hikers and the two uses are very compatible.

I and at least a dozen of my friends are happy to volunteer to offset the financial burden of trail development/improvement. We are ready to help!

Here are the access improvements we are interested in seeing developed:

TOP 3 PRIORITIES! **A new trail between Devils Gulch and Platform Bridge through the Cheda, McIsaac, and Zanardi Ranches.

Extend the Olema Valley Trail to Bolinas on the east side of Highway 1.

A plan to connect the Cross Marin Trail into Point Reyes.

Adoption of social trails off Bolinas Ridge for better connectivity and a single-track trail experience.

Close gaps for bikes through ranch lands in the park, including closing the Estero Trail loop, connecting Sir Francis Drake Blvd. with Pierce Point Road, and connecting Marshall Beach to Pierce Point Road,

Bike access to all ranch roads in the pastoral zone that are already open to pedestrians.

Thanks so much again for listening and taking these comments into consideration!

With gratitude and best wishes, Albert DeSilver

#1010

Name: wood, julian

Correspondence: Please consider creating and opening more trails to bikes, specifically narrow trails and trails that connect to other trail systems. Consider implementing the following recommendations. 1. A new trail between Devil's Gulch and Platform Bridge through Cheda, McIsaac and Zanardi Ranch.

2. A plan to connect the Cross Marin Trail into Point Reyes.

3. Adoption of social trails off Bolinas Ridge for better connectivity and a single-track trail experience.

4. Extend the Olema Valley Trail to Bolinas on the east side of Highway 1.

5. Close gaps for bikes through ranch lands in the park, including closing the Estero Trail loop, connecting Sir Francis Drake Blvd. with Pierce Point Road and connecting Marshall Beach to Pierce Point Road,

6. A more bike-friendly permit application process for road and mountain bike events in the park, including along Bolinas Ridge and out to the lighthouse.

7. Bike access to all ranch roads in the pastoral zone that are already open to pedestrians.

Thanks! Julian

#1011

Name: N/A, N/A

Correspondence: I am in favor of any proposal guaranteeing the management and preservation of all tule elk herds in perpetuity. I see them as a privilege and a necessity. In contrast I wish the ranching and dairying could be scaled back from Point Reyes National Seashore.

#1012

Name: Abbott, Robert

Correspondence: I believe the the elk herds should take preference on food and water sources. I feel that the dairy and cattle numbers should be reduced if habitat conflicts exists. The ouners of the ranch were paid fairly for their property years ago and if they need to move some of their cows they can surly aford to do so.

#1013

Name: N/A, N/A

Correspondence: Although I enjoy mountain biking in the County of Marin. I strongly oppose expanding bicycle routes in the Golden gate national Park area. There are more than ample routes for people to use as it is right now for bicycling. The national Park should stay as much of a wilderness area in relationship with nature as much as possible. Unfortunately, bicyclist have consistently shown disregard for others on trails, and particularly for the condition of the land. . There is so little wilderness left, or at least some abstract sense of being able to be in it. As a bicycle us. I find many and ample satisfying routes to ride without having to invade the wilderness area thank you for reading my comments and for the work you do.

#1014

Name: Weeder, Matt

Correspondence: Thank you for the opportunity to comment. Access4Bikes represents approximately 3000 local mountain bike enthusiasts. Mountain biking has grown much in popularity and now represents your second largest user group at around 40%. Unfortunately new mountain bike opportunities in Point Reyes Seashore and on GGNRA lands has been absent. It is time to review current connectivity gaps and loop opportunities for mountain biking. All improvements for mountain biking can also be shared with hikers and the two uses are very compatible. Also note that Access4Bikes can organize volunteer days to offset the financial burden of trail development/improvement. We are ready to help! Here are the access improvements we are interested in seeing developed:

A new trail between Devils Gulch and Platform Bridge through the Cheda, McIsaac, and Zanardi Ranches.

A plan to connect the Cross Marin Trail into Point Reyes.

Adoption of social trails off Bolinas Ridge for better connectivity and a single-track trail experience.

Extend the Olema Valley Trail to Bolinas on the east side of Highway 1.

Close gaps for bikes through ranch lands in the park, including closing the Estero Trail loop, connecting Sir Francis Drake Blvd. with Pierce Point Road, and connecting Marshall Beach to Pierce Point Road,

A more bike-friendly permit application process for road and mountain bike events in the park, including along Bolinas Ridge and out to the lighthouse.

Bike access to all ranch roads in the pastoral zone that are already open to pedestrians.

Again, thank you for the opportunity to comment.

#1015

Name: potter, whitney

Correspondence: Thank you for the opportunity to comment. I grew up in Marin County and have been mountain and road biking (in fact bmx biking too) since I was 8 years old

Mountain biking has grown much in popularity and now represents your second largest user group at around 40%. Unfortunately new mountain bike opportunities in Point Reyes Seashore and on GGNRA lands has been absent. It is time to review current connectivity gaps and loop opportunities for mountain biking. All improvements for mountain biking can also be shared with hikers and the two uses are very compatible.

Here are the access improvements I am interested in seeing developed:

A new trail between Devils Gulch and Platform Bridge through the Cheda, McIsaac, and Zanardi Ranches.

A plan to connect the Cross Marin Trail into Point Reyes.

Adoption of social trails off Bolinas Ridge for better connectivity and a single-track trail experience.

Extend the Olema Valley Trail to Bolinas on the east side of Highway 1. Close gaps for bikes through ranch lands in the park, including closing the Estero Trail loop, connecting Sir Francis Drake Blvd. with Pierce Point Road, and connecting Marshall Beach to Pierce Point Road,

A more bike-friendly permit application process for road and mountain bike events in the park, including along Bolinas Ridge and out to the lighthouse. Bike access to all ranch roads in the pastoral zone that are already open to pedestrians.

Again, thank you for the opportunity to comment.

Whitney Potter

#1016

Name: Cooper, Bob

Correspondence: Though I live in Livermore, I ride in Point Reyes often, nine days this last October.

Mostly I worry about safety with respect to Mountain Bikes. I ride horses and have had my share of brushes with fast mountain bikes. On a couple of occasions I have been lucky not to have been injured. When I hear mountain bikers talk about the "single track experience" I take that to mean "go fast down a challenging narrow trail".

I object to the "Adoption of social trails off Bolinas Ridge" for whatever reason. The mountain bikers put in these renegade trails and now they want you to adopt them. The parks should decide where trails should go.

Does the NPS have a criteria to judge how safe a trail would be when used by mountain bikes, hikers, and equestrians. Trails that are steep, have poor lines of sight, or numerous sharp curves would not be safe for multi-use. Any new trails that are constructed should be first judged safe.

I'm relieved that the Marin County Bicycle Coalition is not pressing to allow bike on more trails in Point Reyes National Seashore wilderness trails, for now. However, I point out that in October I met three mountain bike that were on "Bikes Prohibited" trails during the day. In talking to locals, they inform me that "packs" of mountain bikes ride Point Reyes National Seashore trails at night.

Without some level of enforcement, the mountain bikers are and will do what they want in the wilderness. In many parks in the East Bay, where I live, that is the case.

Having written the above, I acknowledge that most of the mountain bicyclist are polite and ride safely.

#1017

Name: N/A, Linda

Correspondence: "Approximately 229 million acres of federal public lands in the western United States are used for livestock grazing for cattle and sheep" already according to a study for the Center for Biological Diversity called "Costs and Consequences: The Real Price of Livestock Grazing on America's Public Lands."

This study has also found according to journalist Tina Page "Americans have lost more than \$1 billion over the past decade subsidizing the for-profit livestock industry at the detriment to hundreds of millions of acres of our public lands, and the native animals who have nowhere else to call home."

When we consider Point Reyes National Seashore and the rare Tule Elk that call this park home we must consider what is at stake. After nearly going extinct once before, there are only around 5,000 native Tule Elk in the world today. Meanwhile there are around 95 million cattle in the United States alone... the Tule Elk in Point Reyes National Seashore are not the problem... Races against diminishing biodiversity are happening around the world, many in our own backyards. . . There are only around 5,000 Tule Elk left in the world. Not that long ago this majestic and endemic California species actually numbered an estimated 500,000 strong. At one point they were believed to be extinct mainly due to the pressures of hunting and large scale private cattle farming, but fortunately these magnificent mammals were rediscovered and protected. For those of us who enjoy spending time around wildlife, see the importance that healthy populations have on dynamic ecosystems, and watch the amount of tourism wilder places attract among other things, we are thankful this species still exists. Nevertheless, even after their close call with extinction, there is still tremendous pressure on Tule Elk today. The only National Park where Tule Elk can still be found is Point Reyes National Seashore. The park's own website 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 ranching interests continue to be prioritized. An estimated 5.5 million head of cattle spread out across the entire state of California. Close to 95 million in the United States alone. These are statistics from the United States Government. Is there any room left for our iconic native wildlife in our iconic national parks?

We must stop the cancer that is consuming our last wild and biodiverse places and especially make our National Parks a priority - protect Point Reyes National Seashore and the native and rare Tule Elk that call it home!

Thank you, Linda

#1018

Name: Coburn, Deborah

Correspondence: Elk and cows and humans can co-exist. Let's keep the agriculture and the dairy history of this open space. Let's be an example of how we can all work together.

#1019

Name: Dowd, Rich

Correspondence: Please open up more of the trails in Point Reyes to mountain bikers being advocated by MCBC and Access4Bikes. Point Reyes is such a beautiful treasure. The hiking, the beaches, the flora and fauna, the chance to meet people out and about enjoying all that Pt Reyes has to offer. I have copied and pasted the following items that are being advocated from access4bikes. I am in agreement with all of the recommendations

1. A new trail between Devils Gulch and Platform Bridge through the Cheda, McIsaac, and Zanardi Ranches.
2. A plan to connect the Cross Marin Trail into Point Reyes.
3. Adoption of social trails off Bolinas Ridge for better connectivity and a single-track trail experience.
4. Extend the Olema Valley Trail to Bolinas on the east side of Highway 1.
5. Close gaps for bikes through ranch lands in the park, including closing the Estero Trail loop, connecting Sir Francis Drake Blvd. with Pierce Point Road, and connecting Marshall Beach to Pierce Point Road,
6. A more bike-friendly permit application process for road and mountain bike events in the park, including along Bolinas Ridge and out to the lighthouse.
7. Bike access to all ranch roads in the pastoral zone that are already open to pedestrians.

Thank you for your consideration. Regards,

Rich Dowd

#1020

Name: Zimmerman, Brian

Correspondence: Good afternoon, I'm a hiker and cyclist in Marin County. I strongly support improved access for the following trail connectors.

A new trail between Devils Gulch and Platform Bridge through the Cheda, McIsaac, and Zanardi Ranches.

A plan to connect the Cross Marin Trail into Point Reyes.

Adoption of social trails off Bolinas Ridge for better connectivity and a single-track trail experience.

Extend the Olema Valley Trail to Bolinas on the east side of Highway 1.

Close gaps for bikes through ranch lands in the park, including closing the Estero Trail loop, connecting Sir Francis Drake Blvd. with Pierce Point Road, and connecting Marshall Beach to Pierce Point Road,

A more bike-friendly permit application process for road and mountain bike events in the park, including along Bolinas Ridge and out to the lighthouse.

Bike access to all ranch roads in the pastoral zone that are already open to pedestrians.

Thank you, Brian Zimmerman

#1021

Name: Aragon, Patrick

Correspondence: Please continue to improve bike access to the park. Both road bikes and mountain bikes offer a fantastic opportunity for kids and adults to experience the beauty of the park in a way that is probably only eclipsed by hiking. The benefits of bikes is that you can cover longer distances while maintaining safety.

#1022

Name: Holloway, Sandra

Correspondence: It is important that the native elk have forage and space to live. Cattle can foul waterways and do not belong there. It is time to end grazing on Pt. Reyes Seashore National Park.

#1023

Name: Miller, Marilyn

Correspondence: This is an addendum to my previous comment. Even if the bicycle coalition is not seeking access to trails in wilderness areas at this time, I am still concerned that they may in the future, as I know that there are groups lobbying for bicycle access in wilderness areas around the country. Also I strongly oppose allowing bicycles on any single track trails at Point Reyes National Seashore as their speed combined with the terrain can cause extremely dangerous conditions for hikers and equestrians. I am against any authorization for bicyclists to use "social paths" off of Bolinas Ridge for, as they say, better "connectivity" - - or let's be honest and call it thrills. This is destructive to the environment and the peaceful experience of other users of the park. Point Reyes National Lakeshore management needs to stick to their mission, to preserve and protect this special place for future generations, not create a recreational wonderland for the loudest interest group of the moment.

#1024

Name: Guild, Jeffrey

Correspondence: Hello, I'd like to voice my support for the following initiatives:

A new trail between Devil's Gulch and Platform Bridge through the Cheda, McIsaac, and Zanardi Ranches.

A plan to connect the Cross Marin Trail into Point Reyes.

Adoption of social trails off Bolinas Ridge for better connectivity and a single-track trail experience.

Extend the Olema Valley Trail to Bolinas on the east side of Highway 1.

Close gaps for bikes through ranch lands in the park, including closing the Estero Trail loop, connecting Sir Francis Drake Blvd. with Pierce Point Road, and connecting Marshall Beach to Pierce Point Road,

A more bike-friendly permit application process for road and mountain bike events in the park, including along Bolinas Ridge and out to the lighthouse.

Bike access to all ranch roads in the pastoral zone that are already open to pedestrians.

#1025

Name: Kraybill, Jacob
Correspondence: Hello,

I support ALTERNATIVE F: NO RANCHING AND EXPANSION OF TULE ELK IN THE PLANNING AREA. I think that these public lands should not be available for private profit and that all people should be able to roam free on the land. These spaces should be "converted and offered for public not-for-profit education, research, outdoor experiential activities, and other public recreation and visitor opportunities" as is described in the information packet.

Thank you for your consideration.

Jacob

#1026

Name: Sherman, Elisabeth
Correspondence: Please withdraw HR6687 & protect our native Tule Elk & our environment. This land should not be leased to dairy farmers.

#1027

Name: G, Liam
Correspondence: I am 16 and I like to ride my mountain bike as many places as I can. Increasing or improving any bicycle trails is great progress in my eyes.

#1028

Name: Harris, Holly
Correspondence: Please consider installing more single track for mountain biking Marin County. This could be via social paths along Bolinas Ridge. It would also be nice to be able to link Point Reyes through the Cross Marin Trail by bike. To be able to reach Bolinas via the Olema Valley Trail on the east side of highway 1 by bike would be a wonderful thing as it would get bikes off highway 1. That stretch of the highway is winding and has no shoulder. Bike access should also be allowed on the ranch roads in the pastoral zone that already allows pedestrians. This has been true for Bolinas ridge road for decades with no problems. Thank you, Holly Harris

#1029

Name: Wolin, Benjamin
Correspondence: Opening more trails for bike access is the right thing to do with our public lands. There are many options to do this using existing and retired maintenance roads to provide more opportunity for the public to enjoy access to this wonderful resource without damaging it.

#1030

Name: Latta, Dennis
Correspondence: I would like to have more access to single track my bike trails, particularly those that would create a loop ride

#1031

Name: Hoerberichts, Andrew

Correspondence: Thank you for the opportunity to comment. Access4Bikes represents approximately 3000 local mountain bike enthusiasts. Mountain biking has grown much in popularity and now represents your second largest user group at around 40%. Unfortunately new mountain bike opportunities in Point Reyes Seashore and on GGNRA lands has been absent. It is time to review current connectivity gaps and loop opportunities for mountain biking. All improvements for mountain biking can also be shared with hikers and the two uses are very compatible. Also note that Access4Bikes can organize volunteer days to offset the financial burden of trail development/improvement. We are ready to help! Here are the access improvements we are interested in seeing developed:

A new trail between Devils Gulch and Platform Bridge through the Cheda, McIsaac, and Zanardi Ranches.

A plan to connect the Cross Marin Trail into Point Reyes.

Adoption of social trails off Bolinas Ridge for better connectivity and a single-track trail experience.

Extend the Olema Valley Trail to Bolinas on the east side of Highway 1.

Close gaps for bikes through ranch lands in the park, including closing the Estero Trail loop, connecting Sir Francis Drake Blvd. with Pierce Point Road, and connecting Marshall Beach to Pierce Point Road,

A more bike-friendly permit application process for road and mountain bike events in the park, including along Bolinas Ridge and out to the lighthouse.

Bike access to all ranch roads in the pastoral zone that are already open to pedestrians.

Again, thank you for the opportunity to comment..

#1032

Name: Vigeland, Christian

Correspondence: To whom it may concern,

I am writing in support of expanded bike access in the Point Reyes National Seashore. As a resident of Marin County, frequent visitor to the Point Reyes Seashore, and avid hiker, trail runner and mountain biker trail access is very important to me. I believe hiking, running, cycling and horseback riding all provide a unique way to appreciate the spectacular beauty of our area. With mutual respect and common sense, we can safely and happily share trails (as is so common just about everywhere else I travel to hike or ride). The local cycling community is also tremendously active in trail maintenance and can be relied on to do (often more than) their fair share to build, improve and repair local trails. I sincerely hope you adopt Marin County Bicycle Coalition's recommendations for the Point Reyes National Seashore.

Best regards, Christian Vigeland

#1033

Name: Ross, Ron

Correspondence: I've heard this problem for Years, Trail issues,in the near Birthplace of mtn.bike riding in Marin county. It seems, that certain groups want the trails to themselves. What would be beneficial to the Community would to have these groups work together,on trail maintence etc and compromise. Iv'e been a Member in the past, of our Local bicycle club CCCMB,who's supported the Community for 28 or so years,and everyone seems to work together.Rangers,who appreciate the Trail help,horse clubs,hiking groups,etc. To allow the network to

thrive. Trail education is essential. Marin is a beautiful area, everyone should be able to responsibly enjoy it. Best regards,

Ron Ross

#1034

Name: Muley, Nilit

Correspondence: Hello! I'd like to see trail opportunities that focus on loop routes, connectivity with adjacent public lands, and facilitation of north-south connectivity across the landscape. Potential routes that primarily use abandoned or administrative roads (including ranching roads); for mountain bikes in the Pt. Reyes area. This includes:

A new trail between Devil's Gulch and Platform Bridge through the Cheda, McIsaac, and Zanardi Ranches.

A plan to connect the Cross Marin Trail into Point Reyes.

Adoption of social trails off Bolinas Ridge for better connectivity and a single-track trail experience.

An extension of the Olema Valley Trail to Bolinas on the east side of Highway 1.

Gap closures for bikes through ranch lands in the park, including closing the Estero Trail loop, connecting Sir Francis Drake Blvd with Pierce Point Road, and connecting Marshall Beach to Pierce Point Road.

A more bike-friendly permit application process for road and mountain bike events in the park, including along Bolinas Ridge and out to the lighthouse.

Bike access to all ranch roads in the pastoral zone that are already open to pedestrians.

No additional access to the wilderness area is necessary. Thank you!

#1035

Name: Peck, Christina

Correspondence: As an avid cyclist that frequents Marin and Point Reyes, I was excited by the proposals set forward by Marin Bike to expand use of off road access. I've enjoyed camping at Wildcat but the access off Bolinas Ridge is limited as are ways through the park. I agree with their priorities and would love to help in whatever ways moving forward to build and maintain trails to do so.

A new trail between Devil's Gulch and Platform Bridge through the Cheda, McIsaac, and Zanardi Ranches.

A plan to connect the Cross Marin Trail into Point Reyes.

Adoption of social trails off Bolinas Ridge for better connectivity and a single-track trail experience.

Extend the Olema Valley Trail to Bolinas on the east side of Highway 1.

Close gaps for bikes through ranch lands in the park, including closing the Estero Trail loop, connecting Sir Francis Drake Blvd. with Pierce Point Road, and connecting Marshall Beach to Pierce Point Road,

A more bike-friendly permit application process for road and mountain bike events in the park, including along Bolinas Ridge and out to the lighthouse.

Bike access to all ranch roads in the pastoral zone that are already open to pedestrians.

#1036

Name: N/A, N/A

Correspondence: AS A WALKER/HIKER, I DO NOT SUPPORT INCREASED BICYCLE ACCESS ON FIRE ROADS AND SINGLE TRAILS ANYWHERE ON PARK LANDS. BICYCLISTS TEND TO GO TOO FAST RELATIVE TO CONDITIONS AND ARE NOT RESPECTFUL OF POSSIBLE PEDESTRIAN CONFRONTATIONS. THEY DETRACT FROM MY ABILITY TO ENJOY THE PEACE AND RESTORATION FROM MACHINES OF ANY KIND THAT I SEEK ON PARK LANDS.

I WOULD POSSIBLY BE OPEN TO GIVING BICYCLISTS WAYS TO AVOID RIDING ON PUBLIC PAVED ROADWAYS IN WEST MARIN DUE TO THE FACT THERE ISN'T ROOM FOR THEM ON EXISTING ROADS.

#1037

Name: reid, william

Correspondence: To whom it may concern, I am submitting my comments in the hopes that they will be read in good faith and without judgement. I have read several comments that were sent to me and I would like to have it be known that I am in support of the comments made by Jeff Creque of Cardon Cycle Institute made 11/29/2018 addressed the Superintendent Muldoon. I am in support of continued agriculture on the PRNS because it was the original intention of the ranchers and the park service to preserve the historic ranches and to keep development at bay. I am a farmer and at 58 years old I have seen too many valuable acres of prime farmland turned into development of one sort or another. Someday man will be removing parking lots and apartment building to reclaim the farmland that was buried. We need good stewardship of our most treasured resource and that can not happen without farmers. The ranches on the PRNS need 20 year rolling leases because they are otherwise unable to plan for the future or to make long term improvements, additionally the younger generation can not plan to take over the ranching operation. I would like to see the ranches become diversified in their operations as long as the expansion was done in a way that enhances the long term viability of the ranch and that there is a regenerative component to the diversification. If the anchors are able to diversify they can get out of the outdated livestock model that has become such a burden for so many farms across the country. The opportunity to have truly sustainable model farms that the public can tour and become involved with by purchasing added value products is a brilliant way to bridge the gap between the people who want the farms gone and the people who feel the need to have farms in their life at PRNS. These ranches with their long term rolling leases would be guided to implement the best farm practices known by a community advisory commission made up of the many well qualified organizations that currently operate in Marin County. Climate change is a known consequence of many poor practices and we now have the knowledge and skills to reverse many of ills that have gone on for far too long. One example is the government pushed wet barns and liquid manure systems as a means for efficiency but we know now that they are major contributors to GHG. Dry barns or bedding pack barns and composting can reduce that GHG significantly and the compost has many benefits such as jump starting the carbon cycle and sequestering carbon. Rotational grazing and the very best pasture management can keep invasive weeds under control while also increasing the microbial activity in the soil and forming a stronger more healthy soil. The ranchers need to be able to make changes that will benefit us all and keep the pastoral zone vibrant and visually pleasing.

The Elk need to be kept out of the ranching area because there is no way that the two totally different interests can be managed for the benefit of all if they are allowed to co exist. There needs to be fences built that will keep the elk in their own " wild " area so that they may will a life of relative peace and quite without being hazed and hated by so many. The elk need to managed in the way set forth in the NPS 1998 Tule Elk Management Plan. Electric fences can be effective and in the absence of predators electric fences become the new predator. There can be no free ranging un managed herd of elk out on the PRNS without a major problem for everyone concerned.

Visitor access to the working landscape is a very important part of what a National Park experience should be. These are heritage ranches that should be enhanced and brought out in a positive light. These are wonderful families that have been ranching out there all these years and their existence should not be threatened by a group of individuals who want to see that park in a different way. The ranchers were promised that they could keep ranching forever. I've like you are going to die tomorrow farm like you are going to live forever.

The Park needs to consider the PRNS as a UNESCO World Heritage Site and encourage diversification and enhance the viability and survival of the farms. Develop a PRNS brand of agricultural products to be sold nationwide and made available at all the Nations Parks. A brand of top quality dairy products from grass based dairy farms is on way of increasing the awareness of where our food comes from and a way to honor those who produce the food we all need to survive. We need real food not food produced on or in factories. We need a moratorium on farmland being developed and we need a moratorium on farmland and farmers being taken off the land they have work so hard for so many years.

Thank you for reading. William Reid

#1038

Name: Sievert, James

Correspondence: Please improve the connectivity and expand access for mountain bikes in these lands. Connections to Bolinas and the cross Marin path would be great. Connecting loops make a much more attractive ride. It would be amazing to have off road access since many people do not want to share the narrow high speed roads in west Marin!

Thank you for your work and consideration!

#1039

Name: Wall, Merah

Correspondence: I do not approve of public lands being used for rising of calves in confined spaces. I know the ranches in Point Reyes practice this and I sincerely hope that this is not on public land. This is a reprehensible act and i really would wish it end no matter the location.

#1040

Name: N/A, DJ

Correspondence: I am opposed to extending bicycle access on trails, or adding new trails for bicycles, in the Point Reyes National Seashore. Bicycling wears down topsoil and trail integrity at a rapid pace, accelerating the need for trail repairs and maintenance. They're much more erosion-intensive than walking / hiking usage. Their use is also louder and more disruptive to wildlife and naturalists alike. Please consider preserving these lands as close to their current state for as long as possible so that we pass forward a serene natural resource for future generations. Thank you.

#1041

Name: Procter, Joan

Correspondence: I am a long-time resident of Marin County & a lover of nature. Point Reyes has been home of many joyful & health-related activities for me over 60 years...jogging, hiking, hosteling, beach-combing, cycling, kayaking, camping. As the mountain bike craze has developed in recent years, my attitude has evolved towards respecting their appreciation of enjoying nature, AND the intrusive effect mountain bikes have on trails & on other folks who seek a quiet & calm experience. Just as with the tension between skiing & snow boarding, I think it is wise to separate our natural environments into different public uses. Ski areas have wisely started making specific areas for snow-borders to do their thing (faster & louder), and other pistes & bowls suited for skiers

(smoother & calmer). In any case, our environment must be protected as a natural & health ecosystem over the long-haul, and not disturbed unnecessarily for us humans' recreation. It's a balance that is needed, including for people, animals & the environment. JP

#1042

Name: van der Lee, Aniko

Correspondence: I'm writing to strongly urge you to protect tule elk and other native wildlife at Point Reyes National Seashore. This area is a national treasure, and tule elk recovery here has been an immense success. As a long time San Francisco resident I have enjoyed the Point Reyes National Seashore on many occasions, including as a volunteer during a beach clean up. I was proud to participate in making this incredibly beautiful place cleaner and safer and it truly broke my heart to hear that the NPS is even considering an alternative that would sacrifice the well being of the park's wildlife in favor of agriculture and ranching. It's time to update the Point Reyes management plan in keeping with the Park Service's mission to protect wildlife and the public's enjoyment of this area.

Toward that end, I oppose any killing or removal of tule elk. And I 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 due to conflicts with native predators. It would likely lead to the killing of the park's bobcats, foxes, coyotes and birds.

Instead I urge you to adopt Alternative E. This option would phase out dairy ranching in the park while allowing some beef ranching to continue. And it would not remove or kill any tule elk.

The important thing is to make sure there's enough grass for the elk to eat and to reduce cattle numbers where lands are overgrazed or polluted. 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 ranching families retire.

Thank you for taking my comments into consideration.

#1043

Name: N/A, N/A

Correspondence: Historically, culturally and economically, ranching has been part of Point Reyes. Add to that the potential that exists for climate benefits with the implementation of regenerative practices as well as the stability that could come with 20 year rolling leases and all at once you have an anchor in the community that hasn't had much certainty for years. For those reasons, among others, ranching needs to remain part of the National Seashore, and not just a handful of ranches, but all of them.

Industrial farms and methods have gobbled up land and farmers to the expense of everyone and everything except a very few- -and to those mostly only economically. Land has suffered because of heavy pesticide use, mono crops, loss of organic matter, carbon, nutrients, microbes and water holding capacity. Human health has declined, environmental degradation spreads as cocktails from runoff end up creating dead zones where rivers meet the sea. The population of farmers in the US continues to decline while the average age of a farmer goes up. Who on earth are we thinking is going to grow our food? Robots to do the work and petri dishes containing genetically modified, patented creations are offered as sustainable solutions. But they are not - - they are still based in industrial systems. Point Reyes is home to families of farmers. They are familiar with the land and the seasons - - but for their own resilience and that of the land, as well as the health of the soil and the people who eat what that land produces, they need to be able to diversify - - not just practices that will contribute to the health and diversity of the landscape but also for their own economic stability. Berries, fruit trees, row crops, hay, silage, chickens, fiber producing animals such as sheep - - such a diversity would allow for a system that is closer to the diversity of nature. Right now, farmers are constrained to beef or dairy. That should not be the case for the reasons listed above.

Because the NPS has thousands of acres already under its management as well as the traffic, visitors, wildlife, infrastructure, historic buildings and a range of other responsibilities, to create an Agricultural Advisory Board that could include members from the community who are familiar with agriculture and carbon farm plans (RCD, CCI, Extension Service, MALT) would be the best way to work with the ranchers and the lands in their care.

2.5 million people visit the seashore annually. Local farms in Sonoma and Marin sell out seasonal events year after year. Crowds of urban people choke the roads in October as they head to pumpkin patches to secure a pumpkin and a connection to the land that carries meaning beyond a walk on a trail. People are hungry to build connections that have been hijacked by biotech, industry and urban isolation, and much has been lost in the telling as genetically engineered food is sold as solution. Farm tours and agricultural exhibits, both historical and in the newer context of climate change, in the Visitor Center are a prime opportunity, an essential one, to share the stories, examples and reality of producing food while stewarding the land. Point Reyes should be a living fluid example of the intersection between urban and wild as well as urban and rural. How can people care about what they don't know? This is a park, a public park with agriculture already in it, with agriculture part of its formation. Point Reyes should be a model of a working landscape allowing the public a chance to learn what a working landscape is and how they are integral to their health and that of the planet. Further to that end, a chance to engage with farmers on farm tours and possibly farmstays would be a way to help the public rebuild those connections.

Tule elk are part of Point Reyes. They are prey without predator. No matter what, they need to be managed by NPS - - herd size kept to the original numbers using discrete hunting, contraception or relocation. Allowing the elk routine access to the Pastoral Zone creates an artificial health of the herd as they consume feed ranchers have purchased and distributed for livestock, not to mention the financial and labor hardships that comes from feeding herds of elk, repairing broken fences and whatever other impacts they have on a domestic operation. Not to mention the elk themselves. How wild is wild when you hop a fence to eat hay day after day, are hazed out day after day? It is an artificial existence more akin to a safari park at the expense of the rancher. As wildlife, they should be given the opportunity to experience wild, as much as possible in a confined space with millions of visitors - - in an area not the pastoral zone as had been the original plan when the elk were first introduced to the park.

#1044

Name: Frame, Lynne-Marie

Correspondence: We are writing to express our sincere hope that in deliberations to amend the current General Management Plan for PRNS, the NPS seriously considers the merits of the proposed "Community Action Alternative" (CAA), which posits a plan for continued ranching in the park in a manner that ensures the ongoing viability of the ranches. As community members of West Marin, who have deep roots in the ranching heritage of California, we are very concerned that the NPS use this opportunity to ensure that its dual mission of natural preservation and conservation of the seashore's historical cultural resources is fulfilled, as intended by the agreement of all parties at the park's founding.

This original agreement to preserve the seashore's ranching heritage along with protections of the natural landscape came about because ranching is of value-to the local community and immediate region (as local food providers, employers, vital players in the agricultural infrastructure), and to the national community and park visitors (as educators, keepers of a valued cultural heritage, carbon sequesterers, and very importantly, as stewards of a landscape that has been carefully tended by humans for centuries, if not millennia.)

While we support all aspects of the CAA, we would like to highlight two aspects of this alternative that we find particularly compelling and fundamental to the long-term viability of ranching in the PRNS, given the capital- and knowledge-intensive nature of agriculture as an enterprise.

The first is the proposal that the GMP include 20-year ROLLING agricultural leases for existing family-operated ranching operations in the planning area. While compliance with park operational requirements remains

paramount and protected in this proposal (incl. annual compliance meetings and a 30-day non-compliance cancellation clause), for ranchers operating in compliance and good faith, it is vital that they are able to make investments in their operations-to the benefit of their business and their land stewardship capacity-with the knowledge that there is at least a 20-year horizon for continued operation. The rolling renewal proposal balances the need for the GMP to account for possible long-term policy changes without creating the potential for unreasonably short time frames to transition out of the very capital-intensive, multi-generational business of agriculture, should those changes be called for.

Second, we would submit that the proposal for the creation of an Agricultural Advisory Committee to the NPS, composed of experts with both agricultural and resource conservation expertise, is a vital tool that serves not only the interest of ranchers, but equally, the interest of the public in realizing the potential of ranchers to operate over the long term in a manner that maximizes their contributions to both the cultural and natural preservation objectives of the Seashore. The expert, strategic input on ranching-related matters that such an expert group could provide to the NPS would enable the most effective implementation of other elements of the CAA proposal. These include strategies for collaborative management of non-native invasive plants, the harmonization of historic preservation efforts with ranching improvements, and implementation of Best Management Practices for resource stewardship and carbon sequestration. All of these practices and strategies clearly have far-reaching implications beyond the boundaries of the ranches. How- -and how well- -the ranches are managed and the land is treated in the Seashore impacts the regional ecosystem directly. And, equally important, it affects the public's ability to learn about and appreciate the function and value of carefully considered human activity, which can both use and preserve the delicate balance of a "working" natural landscape.

Ultimately, the public - local, regional, national, and international - benefits from from the PRNS' unique example of hand-in-hand conservation of natural and cultural resources in its combination of working and wild landscapes. It is a precious resource that requires long-term commitment and investment from both the NPS and ranching families to be sustainable. The Community Action Alternative proposals represent a realistic means of preserving this unique and valuable resource.

Respectfully submitted, Lynne Frame and Richard Hoskins

#1045

Name: Klein, Adrienne

Correspondence: To Whom It May Concern,

I understand there is a proposal to create new trails east and west of the fault line in Point Reyes National Seashore. For two reasons, I do not support increasing bicycle access in the park.

I love the park and frequently hike there. It's a place of solitude where I can escape the hectic pace of life outside the park. Having to step aside for cyclists who constantly call out "behind you" or "on your left" is not relaxing. They are usually polite but it still interrupts my experience. They dominate the terrain because they are faster and dangerous to pedestrians.

Second, the more important reason to preclude bicycles from the park is because nature in all its forms should be left minimally impacted by humans. We hikers already disturb the conditions but not in the same way as cyclists. During wet conditions, cyclists rut the trails increasing runoff and erosion. Cyclists also kill slow moving animals caught on the trails while they pass. Finally, they may guerrilla prune native vegetation to ensure that they can ride trails without being impeded by shrubs. I have witnessed a crew of five men doing this in Mount Diablo State Park on January 1st one year. They each had shears and had cut enormous quantities of vegetation!!!

The park was created to prevent a suburban residential development. Please do not build new trails for cyclists or allow them to use more trails than those where cycling is currently allowed, such as the Bear Valley Trail.

Thanks for your consideration of my views.

Sincerely,

Adrienne Klein

#1046

Name: Schwerin, Rich

Correspondence: I support the following:

- 1) A new trail between Devil's Gulch and Platform Bridge through the Cheda, McIsaac, and Zanardi Ranches.
- 2) A plan to connect the Cross Marin Trail into Point Reyes.
- 3) Adoption of social trails off Bolinas Ridge for better connectivity and a single-track trail experience.
- 4) Extend the Olema Valley Trail to Bolinas on the east side of Highway 1.
- 5) Close gaps for bikes through ranch lands in the park, including closing the Estero Trail loop, connecting Sir Francis Drake Blvd. with Pierce Point Road, and connecting Marshall Beach to Pierce Point Road,
- 6) A more bike-friendly permit application process for road and mountain bike events in the park, including along Bolinas Ridge and out to the lighthouse.
- 7) Bike access to all ranch roads in the pastoral zone that are already open to pedestrians.

Thanks

#1047

Name: Bunton, Terry

Correspondence: Hi I'm over 80 years old and can't afford a horse, actually don't want one. But I still want to get out in the county-side even though my hiking days are over. If I ride my bike sensibly with consideration for others, why should I not be allowed, it's public land after all. Thanks, I look forward to your allowing bicycle access.

#1048

Name: Solway, Dillon

Correspondence: It is completely unfair and discriminatory to exclude cyclists from access to public trails that we pay taxes for. Hickies and cyclists should share the trails together as every other place in the world does. Especially considering this is the birth place of mountain biking.

#1049

Name: N/A, N/A

Correspondence: I support MCBC in it's efforts to ensure equal, safe access for all user groups including the under-represented biking user group for use on the trails in the Non-Wilderness areas of the Pt Reyes National Seashore. For far too long, this legitimate, growing user group has been excluded (and discriminated against by other groups) from access to these areas of Public Land! It's time to recognize that this land belongs to everyone and should be shared equally and fairly. Here is a list of the trails and projects that I support: A new trail between

Devil's Gulch and Platform Bridge through the Cheda, McIsaac, and Zanardi Ranches. A plan to connect the Cross Marin Trail into Point Reyes. Adoption of social trails off Bolinas Ridge for better connectivity and a single-track trail experience. Extend the Olema Valley Trail to Bolinas on the east side of Highway 1. Close gaps for bikes through ranch lands in the park, including closing the Estero Trail loop, connecting Sir Francis Drake Blvd. with Pierce Point Road, and connecting Marshall Beach to Pierce Point Road, A more bike-friendly permit application process for road and mountain bike events in the park, including along Bolinas Ridge and out to the lighthouse. Bike access to all ranch roads in the pastoral zone that are already open to pedestrians. Thank you,

#1050

Name: Mosqueda, Dolores Mosqueda

Correspondence: I have been a Marin county resident for 25 years and would like to see a safe and accessible route for bikes. I'm also a recreational mountain biker who would like more access to legal trails here in Marin, whether it be Point Reyes and/or Mount Tamalpais. I appreciate the flora and fauna of this area and would like to see safe connections and routes that are legal for biking instead of feeling like a criminal for riding my bike. More trail access has been a dream for many and the reality has been shut down for so long now. Isn't it time we talk about real access instead of pretending to preserve nature when horses and other user groups degrade the trails as well. I find the laws that have been created to outlaw mountainbike use have been hipocritical with the banning of electric bikes with little enforcement. Yet rangers have use of e-bikes, ATVs and trucks to enforce trail use and speed dangerously past on fire roads with little consideration of mountain bikes on legal trails and fire roads. I am hoping for some real change to make the birthplace of mountain biking more fair and safe in Point Reyes. There are realistic connectors and I look forward to seeing some simple solutions. Mountain bikers aren't going to go away anytime soon and we need to work together to make this a reality for the future. I have seen multi user groups co-exist in other areas that are less affluent and let's not be fooled by the money that influences these decisions. Thank you for your time, Sincerely Dolores

#1051

Name: Marshall, Allison

Correspondence: I'm writing asking you to support our mountain biking and cross country biking teams and students by making as many options available for their rides as possible. Being on this team and in the Rich City Rides Bike Club, has literally saved my 13 year old sons life. Here is a list of what we hope for. From you. Please consider the most we can do... not the least we can do for our kids. Thank you. Allison Marshall mother of Leo Jack aged 13

1. A new trail between Devil's Gulch and Platform Bridge through Cheda, McIsaac and Zanardi Ranch.
2. A plan to connect the Cross Marin Trail into Point Reyes.
3. Adoption of social trails off Bolinas Ridge for better connectivity and a single-track trail experience.
4. Extend the Olema Valley Trail to Bolinas on the east side of Highway 1.
5. Close gaps for bikes through ranch lands in the park, including closing the Estero Trail loop, connecting Sir Francis Drake Blvd. with Pierce Point Road and connecting Marshall Beach to Pierce Point Road,
6. A more bike-friendly permit application process for road and mountain bike events in the park, including along Bolinas Ridge and out to the lighthouse.
7. Bike access to all ranch roads in the pastoral zone that are already open to pedestrians.

#1052

Name: adler, heidi

Correspondence: More trails in Pt.Reyes Seashore, for bicycles

Open the loop from Estero trail to Muddy Hollow to bicycles-that is an old ranch road. A new trail between Devils Gulch and Platform Bridge through the Cheda, McIsaac, and Zanardi Ranches.

A plan to connect the Cross Marin Trail into Point Reyes.

Adoption of social trails off Bolinas Ridge for better connectivity and a single-track trail experience.

Extend the Olema Valley Trail to Bolinas on the east side of Highway 1.

Increase loops for bikes through ranch lands in the park, including the Estero Trail loop, connecting Sir Francis Drake Blvd. with Pierce Point Road, and connecting Marshall Beach to Pierce Point Road,

A more bike-friendly permit application process for road and mountain bike events in the park, including along Bolinas Ridge and out to the lighthouse.

Bike access to all ranch roads in the pastoral zone that are already open to pedestrians.

#1053

Name: Tuorto, Vicky

Correspondence: Please do not add bike trails to Pt. Reyes. Let the wildlife have some peace and let the hikers have some peace of mind not having to worry about getting run over. I've had a few close calls but my neighbor wasn't so lucky. She had to visit the hospital and that was just the beginning of her suffering from her injuries. So please, restrict these maniacs.

#1054

Name: Spicer, Stephen

Correspondence: You have a big beautiful Park, with a lot of History and in a fragile Place...a little bit of everything! !

#1055

Name: Womack, Kristin

Correspondence: This comment is in regard to the Amendment to the General Management Plan for Pt. Reyes Seashore and the north unit of GGNRA lands that are leased for ranching, particularly regarding the elk-ranching conflict, which is the focus of the Management Plan changes.

The Park Service proposes to address five alternatives: A - continuing current management (NO ACTION); B- Continued Ranching and Management of The Drake's Beach Tule Elk herd (NPS proposed action; C - Continued Ranching and Removal of the Tule Elk at Drake's Bay; D - Reduced Ranching and Management of the Drake's Beach Tule Elk; E - No Dairy Ranching and limited Management of Drake's Beach Elk Herd. Actions common to all alternatives focus on enhancing public use, hiking, biking, public, trails and day use facilities. There are no common actions to protect the Park's wildlife or natural resources.

I am not opposed to continuing some agriculture at Pt. Reyes, recognizing that ranching was part of the agreements establishing the Seashore. My primary concern is the protecting of the park's wildlife and wild habitats. Apparently some avian species benefit from grazing, as long as there is not overgrazing. What impact does ranching have on other wildlife that use parklands? Using public land should require a high standard of

stewardship. What standard are ranchers held to and what recourse does the NPS have if these are violated? How are the standards implemented? Could abandoned ranch lands be restored to grazing habitat, if no family members are interested in continuing to engage in ranching? I am very concerned about what criteria would be used and how decisions would be made to decide to cull and/or remove elk from the park. These elk have historically suffered greatly from over-hunting, bringing the species at one time to the brink of extinction. I am absolutely opposed to any plan that would simply cull these herds by killing them or allowing anyone to hunt them, even on Indian lands. I believe that the growing population of Tule Elk should be given every protection and allowed to flourish. The fact that so many died recently because of a lack of water and food is still shocking and appalling to me.

#1056

Name: whitty, john

Correspondence: I support A new trail between Devil's Gulch and Platform Bridge through the Cheda, McIsaac, and Zanardi Ranches.

A plan to connect the Cross Marin Trail into Point Reyes.

Adoption of social trails off Bolinas Ridge for better connectivity and a single-track trail experience.

Extend the Olema Valley Trail to Bolinas on the east side of Highway 1.

Close gaps for bikes through ranch lands in the park, including closing the Estero Trail loop, connecting Sir Francis Drake Blvd. with Pierce Point Road, and connecting Marshall Beach to Pierce Point Road,

A more bike-friendly permit application process for road and mountain bike events in the park, including along Bolinas Ridge and out to the lighthouse.

Bike access to all ranch roads in the pastoral zone that are already open to pedestrians.

#1057

Name: Cavallero, Wendy

Correspondence: Please keep hiking trails also open to horses and hiking on foot. Please keep the bicycles off the nature trails. Bicycles are not nature and a lot of bicyclist lack consideration for others on the trail, plus they go too fast to safely avoid a horse or child on the trail. Please keep Pt . Reyes trails to hiking and equestrian. As hikers and equestrians we value nature and the quietness of the trails. Thank you so much for your help in keeping the trails nature.

#1058

Name: Perry, Constanza

Correspondence: Dear NPS,

I am writing to strongly protect Pt Reyes and keep it as our most wilderness land in Marin County. I think you know what I mean by wilderness. Yes I am a trail rider. I have ridden my horse there my whole life. I camp at Stewart Horse Camp every summer. Pt Reyes has a special designation. We don't have anything like it today and we need to protect it. There are trails that horses are not allowed on. We need to protect this. I am not asking for access to more trails. I understand this. Pt Reyes is our only wilderness area in Marin and it needs to be protected. If bikes get more access they are unfortunately going to poach trails and it will turn into Tennessee Valley (GGNRA) where I have ridden my whole life. It has become Grand Central Station there.

Thank you!

Constanza Perry

#1059

Name: MacLellan, Margaret

Correspondence: I am writing on behalf of the wildlife in Point Reyes. I know it must be difficult to balance all interest in a National Park, however, I feel wildlife must be the number one priority. Some animals are being lost every day. Some exist no where else. Lower total numbers equal lack of biodiversity, which leads to increased vulnerability. Please do not think grazing cattle is viable or without problems. Cattle bring disease and overgraze areas. Overgrazed areas may take years to return to use, if they return at all. Runoff from their waste, & erosion are also a problem. Thank you for your attention.

#1060

Name: N/A, N/A

Correspondence: I urge you to NOT remove or kill the Tule Elk in Point Reyes. What type of landscape are we leaving for future generations if we are a society of " ranch" animals occupying our open spaces. Thank You

#1061

Name: Grossnickle, Joshua

Correspondence: Please support bike access to point Reyes.

#1062

Name: Sargent, Tom

Correspondence: As a resident of Marin; former Board Member and current Advisory Board Member of the Point Reyes National Seashore Association; constant visitor to the Park; avid hiker; and long term NPS partner in the historic rehabilitation of the Presidio (Thoreau Center for Sustainability) and Fort Baker (Cavallo Point Lodge), I strongly urge the NPS to proceed with all necessary planning and environmental analysis for the development of a north-south continuous, non-motorized hiking trail from the southern boundary of the Park to the tip of Pierce Point. The Final EIS for the GMP Amendment is a perfect opportunity to formalize the NPS's commitment to this important element of the Park's evolution as a coastal wilderness and historic/cultural/educational destination that can be experienced on foot.

Most of the potential trails to create this route are in place today, but are not coherently linked as a north-south route that allows one to hike for several days through the full length of the Park without walking for long distances on paved roads with ever increasing automobile traffic, vastly diminishing the coastal wilderness experience and the opportunities for learning by being in the direct experience of Nature for extended periods of time.

My colleague from PRNSA, Dick Bunce, has well articulated in a comment letter, the potential alignments, principles for trail development, and opportunities to expand overnight accommodation on the North-South trail system. I fully support his recommendations as outlined in his letter. I agree with his assessment that State Coastal Conservancy funding is a good place to start, but also add that the vision of a world class multi-day coastal trail from the Golden Gate Bridge to the tip of Point Reyes will capture the public's imagination and attract its own funding as the Bay Ridge Trail, Appalachian Trail, and Pacific Crest Trail have demonstrated.

There is ever increasing interest across the world in self-guided multi-day (and often multi-week) hiking experiences that allow people to leave their cars and head out on foot with minimal packs, knowing that there are places to stay and get food along the way. Different from pure wilderness back-packing, these hiking routes allow for a mix of cultural/historical/environmental learning experiences and are more accessible to a diverse public, many of whom are not able to carry a 40-50 pound backpacker's pack for long distances.

The Point Reyes Peninsula offers the opportunity for a wonderful array of experiences today with its highly complex interwoven web of the cultivated and the wild in a dramatic setting. What is missing is the ability for most visitors to get out of their cars for more than a day. The north-south trail, particularly if it can link with north-south trails in the GGNRA and on Mount Tamalpais all of the way to the Golden Gate Bridge, will become an iconic walking experience.

#1063

Name: Furman, Donn

Correspondence: Besides those identified in the NOI, EIS should address the following issues:

1. Potential impact on traffic, water and air quality, and aesthetics of allowing diversification activities on historic ranches, including chicken and hog operations. 2. Potential impacts on water quality, aesthetics and land use if bicycle use is expanded beyond existing designated bike trails. Conflicts between equestrian, hiking and bicycling use must be addressed in the plan, and associated impacts addressed in the draft EIS. 3. Plan and EIS should address expansion of recreational use on historic ranches where such use does conflict with leases. In particular, areas currently unavailable for recreational use due to fencing should be evaluated for expanded public recreational use. Thanks for considering my comments on scoping.

#1064

Name: Anzalone, Susan

Correspondence: Please allow mountain biking at Point Reyes. There's not enough singletrack available and many riders have to drive down to Santa Cruz or up to Santa Rosa if they want to ride somewhere other than Tamorancho or China Camp. I lived in Marin for 14 months and SF for 11 years. I come back about 6x per year and stay in Marin. Would love to be able to ride more singletrack in Marin. Thanks!

#1065

Name: Sargent, David

Correspondence: Please provide improved bike access. I support the MCBC requests which are as follows;

FOR, ON YOUR BEHALF:

A new trail between Devil's Gulch and Platform Bridge through the Cheda, McIsaac, and Zanardi Ranches.

A plan to connect the Cross Marin Trail into Point Reyes.

Adoption of social trails off Bolinas Ridge for better connectivity and a single-track trail experience.

An extension of the Olema Valley Trail to Bolinas on the east side of Highway 1.

Gap closures for bikes through ranch lands in the park, including closing the Estero Trail loop, connecting Sir Francis Drake Blvd with Pierce Point Road, and connecting Marshall Beach to Pierce Point Road.

A more bike-friendly permit application process for road and mountain bike events in the park, including along Bolinas Ridge and out to the lighthouse.

Bike access to all ranch roads in the pastoral zone that are already open to pedestrians.

no access to the Wilderness Area is being requested.

#1066

Name: Norman, Gil

Correspondence: As a 63 year resident of Marin County I'm well aware of all the beautiful places we have here. And I'm also an avid bicyclist and know the groups that I ride with love having access to more of these places. Bicycling friends have always been good Stuart's of Nature and would love an opportunity to be able to ride in places where other groups have access as well. We always approach sharing the trail with a very friendly attitude.

#1067

Name: Cleary, Jeffrey

Correspondence: Cleary Bikes builds bikes designed for kids to ride anywhere and everywhere. Our company is comprised of parents who ride with our kids and advocate for other parents to get outside and ride with their kids.

We support making the outdoors available to everyone. The more time we all spend in nature, the more we learn to respect it and value it and work to preserve its beauty. By limiting park use, you take away yet another connection between people and their natural environment.

Please open the parks to everyone. Please let families experience the beauty Marin has to offer. If you continue to restrict park use and take away the next generation's access, our kids will grow up with no regard for our natural playground.

#1068

Name: Sellman, Joel

Correspondence: I strongly support the position of the MCBC on opening up land and trails to bike access. I spend a lot of time cycling in all of the areas addressed here both on and off the road. I think the amount of interest and usefulness makes it worth the impact. I am especially interested in seeing connectivity spots where addition of a small bit of trail can make all the difference in accessing a big ride opportunity or making a loop out of what would be an out and back route. Thanks for your consideration. -Joel Sellman

#1069

Name: Franzen, Teri

Correspondence: The protection of the Point Reyes National Seashore extends to preserving "its natural setting, and protect[ing] it from development and uses which would destroy the scenic beauty and natural character of the area". Tule Elk are indigenous to this park. Ranch cattle are not. No legislation should dictate the removal or killing of a native wild animal to settle a conflict with cattle grazing in a National Park. The government must do everything in its power to preserve and protect the Tule Elk herd. Killing native elk in favor of ranch cattle is not acceptable.

#1070

Name: Grubert, Marc

Correspondence: I am writing in support of expanding mountain biking opportunities in Point Reyes. Creating outdoor opportunities for our youth is vital to the survival of all our parks and open spaces.

#1071

Name: Brown, David

Correspondence: Would love to see more access to bicycles. Please look at a policy that allows more and balanced access to all members of the public, not just the current few activities.

#1072

Name: MULLIN, MICHAEL

Correspondence: I support MCBC in it's efforts to ensure equal, safe access for all user groups including the under-represented biking user group for use on the trails in the Non-Wilderness areas of the Pt Reyes National Seashore. For far too long, this legitimate, growing user group has been excluded (and discriminated against by other groups) from access to these areas of Public Land! It's time to recognize that this land belongs to everyone and should be shared equally and fairly. Here is a list of the trails and projects that I support: A new trail between Devil's Gulch and Platform Bridge through the Cheda, McIsaac, and Zanardi Ranches. A plan to connect the Cross Marin Trail into Point Reyes. Adoption of social trails off Bolinas Ridge for better connectivity and a single-track trail experience. Extend the Olema Valley Trail to Bolinas on the east side of Highway 1. Close gaps for bikes through ranch lands in the park, including closing the Estero Trail loop, connecting Sir Francis Drake Blvd. with Pierce Point Road, and connecting Marshall Beach to Pierce Point Road, A more bike-friendly permit application process for road and mountain bike events in the park, including along Bolinas Ridge and out to the lighthouse. Bike access to all ranch roads in the pastoral zone that are already open to pedestrians. Thank you,

#1073

Name: Packard, Andrew

Correspondence: Bike access for all! It is long overdue - - these areas need to be opened up to bikes as there are many more cyclists than horse folks. Its a matter of fairness to the real users of these public lands and they should be for ALL of us. Also, the science is in, on who causes more erosion - - horses - - and leaves behind more fecal matter, denigrating the experience for all other users.

#1074

Name: N/A, N/A

Correspondence: As aptly described by Access4Bikes, Please consider increased access for bikes in your future plans. Thank you, Russell Moore

#1075

Name: Hammond, Chuck

Correspondence: I wholeheartedly support accessing Point Reyes' trails by bicycle. Regardless of the protestations of some user groups, mountain biking has NOT proved to be incompatible with public land use. There is simply no good reason to prohibit access by bicycle. NONE.

#1076

Name: Pavelka, Erik

Correspondence: Thank you for the opportunity to comment. Access4Bikes represents approximately 3000 local mountain bike enthusiasts. Mountain biking has grown much in popularity and now represents your second largest user group at around 40%. Unfortunately new mountain bike opportunities in Point Reyes Seashore and on GGNRA lands has been absent. It is time to review current connectivity gaps and loop opportunities for mountain biking. All improvements for mountain biking can also be shared with hikers and the two uses are very compatible. Also note that Access4Bikes can organize volunteer days to offset the financial burden of trail development/improvement. We are ready to help! Here are the access improvements we are interested in seeing developed:

A new trail between Devils Gulch and Platform Bridge through the Cheda, McIsaac, and Zanardi Ranches.

A plan to connect the Cross Marin Trail into Point Reyes.

Adoption of social trails off Bolinas Ridge for better connectivity and a single-track trail experience.

Extend the Olema Valley Trail to Bolinas on the east side of Highway 1.

Close gaps for bikes through ranch lands in the park, including closing the Estero Trail loop, connecting Sir Francis Drake Blvd. with Pierce Point Road, and connecting Marshall Beach to Pierce Point Road,

A more bike-friendly permit application process for road and mountain bike events in the park, including along Bolinas Ridge and out to the lighthouse.

Bike access to all ranch roads in the pastoral zone that are already open to pedestrians.

Again, thank you for the opportunity to comment.

#1077

Name: Forsberg, Laila

Correspondence: Please open more trails for mountain biking. Thank you!

#1078

Name: Sanctuary, Gabe

Correspondence: I look forward to improved bike access for my family and other outdoor enthusiasts. There are many beautiful places that could be open to park users without driving huge distances all around the park. Thanks for your time.

#1079

Name: Spade, Cindy

Correspondence: I'm writing today to show support for the mountain bike community of more trails being open to the public.

Being out in nature is a gift for all to share and take care of. Opening more trails to mountain bikes allow more stewards of nature and trails to enjoy them.

Thanks for your Consideration Cindy

#1080

Name: Walter, Breanne

Correspondence: My husband and I are avid mountain bikers and would love to be able to ride at Pt Reyes. We respectfully share many of our trails with horses and grazing cattle out here in Livermore and Pleasanton. With each recreation group showing respect and concern for others on the trail the more people that get outside the better! We often ride mt Tam and Tamarancho and would enjoy additional trails to visit in the area.

#1081

Name: Shaheen-McConnell, Theo

Correspondence: Thank you for the opportunity to comment. Access4Bikes represents approximately 3000 local mountain bike enthusiasts. Mountain biking has grown much in popularity and now represents your second largest user group at around 40%. Unfortunately new mountain bike opportunities in Point Reyes Seashore and on GGNRA lands has been absent. It is time to review current connectivity gaps and loop opportunities for mountain biking. All improvements for mountain biking can also be shared with hikers and the two uses are very compatible. Also note that Access4Bikes can organize volunteer days to offset the financial burden of trail

development/improvement. We are ready to help! Here are the access improvements we are interested in seeing developed:

A new trail between Devils Gulch and Platform Bridge through the Cheda, McIsaac, and Zanardi Ranches.

A plan to connect the Cross Marin Trail into Point Reyes.

Adoption of social trails off Bolinas Ridge for better connectivity and a single-track trail experience.

Extend the Olema Valley Trail to Bolinas on the east side of Highway 1.

Close gaps for bikes through ranch lands in the park, including closing the Estero Trail loop, connecting Sir Francis Drake Blvd. with Pierce Point Road, and connecting Marshall Beach to Pierce Point Road,

A more bike-friendly permit application process for road and mountain bike events in the park, including along Bolinas Ridge and out to the lighthouse.

Bike access to all ranch roads in the pastoral zone that are already open to pedestrians.

Again, thank you for the opportunity to comment.

#1082

Name: Welch Sr. QA Manager, Chris

Correspondence: The mission statement for the National Park Service reads 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."

It does not state that the NPS will bow to the interests of Straus Family Creamery, allow them to continue the degradation the environment of a National Seashore through obvious overgrazing and overall poor stewardship of their ranches (I know this because I am a lifelong dairyman, albeit a lefty environmental dairyman).

Straus will get public backlash from this. We do not live in the 1950's anymore. These are new times and Straus dairy needs to dial it back a notch and or else the credibility of all organic dairies will be further impacted.

And you, the NPS, should not be so nakedly in their pocket.

#1083

Name: Casey , Anne

Correspondence: Hello, as an avid hiker and cyclist I share mutual interest. I however strongly feel that Point Reyes should not be overused as it's fragility is apparrant. Addittionally, I strongly feel no further impact should be allowed on the coastline and in particular areas of current research projects which are imperative for the future of our marine life and related habitats. The idea of creating new roads and turning the area into a bicycle park for racing and events terribly misguided. I am open to discussing access to major wide fire roads for cyclists in a case by case basis but only with emphasis on well mannered cyclist behavior. It's dangerous when cyclist come upon hikers without warning and go much too fast. For that matter- the horse riders should not be allowed to leave huge piles of dung on the hiking trails as well. It is hard with my work schedule to come to community forums but I am very interested in this proposal and appreciate the opportunity to comment. We have been able to keep these precious and significant natural areas from destruction by limiting heavy impact. Please consider that the bicyclists have many other venues and that we must take the time to ensure poor decisions for the long run are made because one group has more lobbying power. Thank you for listening. Anne Casey

#1084

Name: H, Jim

Correspondence: I am an avid mountain biker that rides multiple times each month on Bolinas Ridge and in Pt Reyes. My young son and girlfriend have ridden with me on Mt Vision and in Olema Valley. This area is not far from our home in Fairfax. Please consider granting more access for mountain bikes to this beautiful part of our county. For instance, it would take very little to connect the legal trails north of Bear Valley fire road to the legal trails south of there, creating a big loop of continuous riding. There are also numerous proposals by local bicycle advocacy groups that would extend existing legal trails so that a continuous system can be created with minimal paved sections from Samuel P Taylor and Mount Barnabe all the way to Pt Reyes. I have been on just about every trail in the park, either on foot or on my bike, and it is obvious that Pt Reyes does not see the traffic that easier-to-access areas like Mt Tam do. Please consider granting more bike access to single track trails that represent the kinds of challenges that modern mountain bikers seek. A legal loop that includes Coastal Trail would open up a beautiful section of the park to bikes, which represent a good way for visitors to access the more remote areas without the extreme erosion that horses cause (very evident on Olema Valley Trail and many others). I have personally experienced the heavy-handed enforcement of rules against cyclists in the park. It baffles me that rangers feel they have the right to ticket cyclists on legal trails based on a vague description by witnesses. I am aware of one incident that involved tickets to 2 separate groups of "one woman and two men" for the same alleged trail use violation. Thank you for considering my thoughts and I look forward to a future where my 9 year old son can enjoy the treasures of West Marin public lands as he chooses - on foot, horseback, or a mountain bike.

#1085

Name: Tompkins, Laura

Correspondence: Hello, I'm a 18 year resident of Marin County, and am a hiker and a mountain biker. Please consider MCBC's requests of improved bike access in public lands of Pt Reyes National Seashore and surrounding area. Here's what MCBC has asked for and I support all of these:

"A new trail between Devil's Gulch and Platform Bridge through the Cheda, McIsaac, and Zanardi Ranches.

A plan to connect the Cross Marin Trail into Point Reyes.

Adoption of social trails off Bolinas Ridge for better connectivity and a single-track trail experience.

An extension of the Olema Valley Trail to Bolinas on the east side of Highway 1.

Gap closures for bikes through ranch lands in the park, including closing the Estero Trail loop, connecting Sir Francis Drake Blvd with Pierce Point Road, and connecting Marshall Beach to Pierce Point Road.

A more bike-friendly permit application process for road and mountain bike events in the park, including along Bolinas Ridge and out to the lighthouse.

Bike access to all ranch roads in the pastoral zone that are already open to pedestrians.

Bikes have no access to the Wilderness Area, and we're asking for none!"

#1086

Name: Longstreth, Carolyn

Correspondence: The following comments are submitted on behalf of the Marin Chapter of the California Native Plant Society (Marin CNPS) regarding the General Management Plan Amendment (GMPA) process. 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. Marin CNPS has 350 members.

A. Introduction. Marin CNPS would first like to thank the Point Reyes National Seashore (PRNS) for providing this opportunity to comment on the scope of the forthcoming Draft Environmental Impact Statement (DEIS). In doing so, we urge the Seashore to seize the opportunity to incorporate natural resource conservation and restoration goals into every aspect of the DEIS and future management of the ranches in the planning area.

B. Congressional Intent and Biodiversity Management. Marin CNPS would like to see the DEIS embrace increased biodiversity in the planning area as an overarching principle to shape all aspects of the eventual General Management Plan. Such an approach would promote the vision embodied in the Organic Act and the type of experience the public has come to expect in national parks. The Organic Act, as you know, provides that the mission of the National Park Service 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".

The original 1962 enabling legislation for the Seashore declared that it 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... ." Public Act 87-667 Sec. 1. 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).

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.

Over the course of the 1970's, Congress increased the funding for acquisition of the parklands and most or all of the ranchers agreed to sell while the NPS granted reservations of use and occupancy (ROP's) or life estates to landholders who wanted to continue ranching. Sadin at 140-141,177. In 1978, Congress again amended the enabling legislation to shorten the term of years a ranch could remain after purchase but at the same time authorized leases of agricultural lands "where appropriate in the discretion of the Secretary." 16 USC 459c(5).

When the earlier reservations of use began to expire in the 1990's, then-Superintendent 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.

This early history plainly demonstrates that Congress did not envision permanent status for the ranches when the Seashore was created. Moreover, the authority to enter into leases was made discretionary with the Secretary where appropriate. Nothing in the series of Congressional enactments suggests that preservation of ranching for its own sake had somehow supplanted the original purposes of preserving "natural values" and "maximum protection, restoration, and preservation of the natural environment... ."

Nor have recent developments changed the essential mission of the Park. The 2012 order of then-Secretary of Interior Ken Salazar mandated the Seashore to pursue 20 year lease arrangements "consistent with applicable laws and planning processes." Similarly, Representative Jared Huffman's recently-introduced bill directs the Secretary to issue longer leases while also completing the park's general management planning process in a manner consistent with the National Environmental Policy Act and other law.

Any of the proposed ranching Alternatives must therefore be carried out in a manner consistent with the Organic Act and PRNS enabling legislation, including Congressional direction to work toward maximum protection, restoration, and preservation of the natural environment within the area.

Marin CNPS offers the following specific points on the scope and content of the DEIS:

- Conservation Framework and Resource Protection Buffers

Marin CNPS enthusiastically supports the proposed Conservation Framework as a tool which can be adapted to the conditions on each ranch so as to accommodate both the ranchers' objectives and the needs or requirements of biological resources. Using the concept of Land Management Units, planners will be able to regulate the intensity of agricultural use in order to protect natural resources, streams and wetlands and prevent erosion. In the interest of full disclosure and in order to facilitate proper public review, we urge you to set forth in the DEIS how the Conservation Framework will be applied on each ranch.

Marin CNPS notes that the "banners" that were presented to the public in recent community meetings did not show the locations of the "resource protection buffers" to be included with the various Alternatives. In order to properly evaluate the Alternatives, Marin CNPS asks that the DEIS set forth where such buffers are to be located, what resource each is intended to protect and what management actions will be taken within the boundaries of each.

- Mapping of rare plant species and communities, past and present.

Many rare plant species are found in the planning area. To name just a few, these include Point Reyes meadowfoam (*Limnanthes douglasii* var. *sulphurea*), coast lily (*Lilium maritimum*), Point Reyes blennosperma (*Bennosperma nanum* var. *robustum*), beach starwort (*Stellaria littoralis*), San Francisco spineflower (*Chorizanthe cuspidata* var. *cuspidata*), wooly-headed spineflower (*Chorizanthe cuspidata* var. *villosa*) and Sonoma spineflower (*Chorizanthe cuspidata*, var. *valida*), and San Francisco owl's-clover (*Tryphysaria floribunda*), Point Reyes birds-beak (*Chloropyron maritimum* ssp. *palustre*).

It is essential that the DEIS provide a detailed inventory of vegetation with maps of the current locations and population sizes of all vegetation types, rare, federal or state-listed and California Rare Plant Ranked species and plant communities, including coastal bluffs, coastal prairie, coastal scrub, dunes, paleodunes and native bunchgrass stands.

Any available data on the past locations of plant communities should also be included in the DEIS. Valuable information gathered in the early days of the Seashore will be highly useful to the current planning process. In the 1970s, Seashore Biologist Richard Brown worked with UC Berkeley's Remote Sensing Lab to prepare a vegetation map by interpreting USGS black & white ortho-photo quadrangles; this would be a useful baseline. Also, permanently established transects were sampled and photographed by NPS in 1967, 1971 and 1975 on seven (7) ranches within the Pastoral Zone (Kehoe, McClure, RCA, North Beach, Heims, Spaletta, George Nunes) plus eight (8) other locations throughout the Seashore. These data would further help to describe the species composition of vegetation types that covered the Pastoral Zone 50 years ago.

These historic sources should be reviewed together with more recently-gathered rare plant monitoring data and current vegetation mapping so as to identify areas to be protected or restored.

Only with complete information on vegetation types, plant species, rarities and communities can park planners and the public gauge how the proposed Alternatives will protect these resources and enhance biodiversity.

- The DEIS Should Address the Role of Grazing in Promoting or Hindering Native Plant Species and Communities.

Managing rangeland to promote native plant diversity and abundance is an enormously complex endeavor. In our view, the best available scientific papers recognize that the benefits or detriments to native plants from grazing

greatly depends on the particular site, the growth pattern of the species to be encouraged, the timing and intensity of grazing, the species of grazers involved and many other variables. It is critical that the DEIS analyze all of these considerations on a ranch-by-ranch basis so as to formulate grazing plans that better protect and enhance the diverse habitats of Point Reyes and its rich biodiversity.

California grasslands and prairies evolved under a regime of grazing by Pleistocene-era megafauna that included 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)[pdf available on line].

Foraging differences between species are dictated by size and nutritional requirements as well as anatomical differences in teeth, lips, mouth structure and digestive systems. Smaller ruminants such as deer, goats and pronghorn favor shrubby plants while larger species like cattle and elk prefer grasses and similar plants. Grazing Handbook at 9.

Elk have some advantages over cows from a conservation point of view. 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.

Grazing has numerous documented negative impacts on vegetation, including direct removal of desirable native species, trampling and compaction of soils, an increase in some invasive plants, increased sedimentation and erosion of streambanks, ranch roads and gullies caused by animal trailing, as well as habitat changes harmful to wildlife, especially riparian and grassland birds. Grazing Handbook at 20-21. Cattle waste can pollute surface waters, especially where cows are confined. Grazing Handbook at 21.

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. On the other hand, this study cited others that concluded that grazing may be a crucial factor in the initial invasion of exotic annual grasses but less important to the relative growth of alien versus native species thereafter. A. Carlson, Effects of burning and grazing on native plant abundance and diversity in a California grassland invaded by *Phalaris aquatica* [PDF available online]. See also Hatch et al., Effects of Burning and Grazing on a Coastal California Grassland, *7 Restoration Ecology* 376 (1999).

Similar findings were reported in a 1974 study at Point Reyes that compared vegetative cover and species' relative abundance on heavily grazed, moderately grazed and ungrazed plots. H.W. Elliott and J. D. Wehausen, Vegetational Succession on Coastal Rangeland of Point Reyes Peninsula. *22 Madrono* 5 at 231-238 (1974).

These studies suggest that grazing should be greatly reduced in the planning area. Yet, 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.), owl's-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, 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 Myrtle's silverspot butterfly, and dwarf plantain (*Plantago erecta*), an important plant food for the Bay checkerspot. Grazing Handbook at 15, 18.

The pastures at Bull Point support a variety of annual wildflower species that are not readily found elsewhere, including large-flowered linanthus (*Leptosiphon grandiflorus*), rosy linanthus (*Leptosiphon parviflorus* var. *rosaceus*), north-coast phacelia (*Phacelia insularis* var. *continentis*), glandular coast gilia (*Gilia millefoliata*), coast evax (*Hesperis matronalis* var. *brevifolia*) as well as several unusual grasses, sedges, bulbous plants and orchids. As stated above, some level of grazing improves habitat for these native annuals, while too much would harm them as well as native grasses and sedges. On ranches supporting native coastal prairie and perennial grasslands, grazing should also be carefully limited to promote these plant communities.

The DEIS should use the findings outlined above to develop a nuanced plan for achieving the benefits of grazing while avoiding its negative impacts. Again, Marin CNPS urges Seashore planners to carefully identify the important vegetative resources on each ranch and, using the Conservation Framework, design a grazing regime that will promote the growth and survival of whatever species or category of plants - - native perennial grasses, for example, or native annuals and forbs - should be promoted there.

Marin CNPS looks forward to providing further input on this very important aspect of the planning process.

- Trails.

Marin CNPS supports the concept of increasing public access on the ranches, loop trails and use of existing ranch and/or administrative roads as opposed to new trail construction. The DEIS should include proposed mitigation measures and BMPs to protect rare plants and plant communities from the impacts of cycling, horse-riding and hiking.

- Criteria for reduction of ranching in Alternative D.

A reduction of ranching may benefit native species and plant communities but only if the areas withdrawn from ranching are biologically important and can be expected to benefit from less or no grazing. But the criteria currently proposed for selecting the ranches to be eliminated - - no residence or developed complexes - - appear to be driven by considerations other than a promotion of biodiversity. The DEIS should rectify this.

- Individual Ranch Plans.

Marin CNPS hopes to engage with the preparation of specific plans for the various ranches. These must be appropriately detailed, as urged above, and include beneficial management practices and mitigation measures. Any sound grazing plan must also incorporate principles of adaptive management so as to evaluate the plans' success in reaching specific goals for enhancing biodiversity and, if necessary, modifying such plans.

Thank you again for the opportunity to comment. California Native Plant Society, Marin Chapter Carolyn Longstreth on behalf of the Board of Directors

#1087

Name: N/A, N/A

Correspondence: I have two types of comments, one regarding raising cattle for beef and dairy, and one regarding off-road bicycle access.

1) Allowing ranching activities on public land at the expense of native species (tule elk) and also public access is not how I would like this park to be managed. California has a lot of other land on which cattle can live; preserving limited, pristine rugged coastline for native species and allowing public access is a critical use of public lands. Please remove cattle raising operations from these public lands.

2) I would like to recreate on my public lands in Point Reyes with an off-road bicycle. Here are some mountain bike access improvements to consider: -A new trail between Devils Gulch and Platform Bridge through the Cheda, McIsaac, and Zanardi Ranches. -A plan to connect the Cross Marin Trail into Point Reyes. -Adoption of social trails off Bolinas Ridge for better connectivity and a single-track trail experience. -Extend the Olema Valley Trail to Bolinas on the east side of Highway 1. -Close gaps for bikes through ranch lands in the park, including closing the Estero Trail loop, connecting Sir Francis Drake Blvd. with Pierce Point Road, and connecting Marshall Beach to Pierce Point Road, -A more bike-friendly permit application process for road and mountain bike events in the park, including along Bolinas Ridge and out to the lighthouse. -Bike access to all ranch roads in the pastoral zone that are already open to pedestrians.

Thank you for the opportunity to comment.

#1088

Name: Esdorn, Nicki

Correspondence: I am strongly opposed to opening up the wilderness trails to MCBC, the bikers. Bicycle riders disturb the wildlife, unlike horseback riders. Point Reyes' Wilderness trails must be protected.

#1089

Name: Kaplove, Jacob

Correspondence: Thank you for the opportunity to comment. I grew up in Marin County and currently live in San Francisco. Mountain biking has been a way for me to enjoy nature for as long as I can remember.

Access4Bikes represents approximately 3000 local mountain bike enthusiasts. Mountain biking has grown much in popularity and now represents your second largest user group at around 40%. Unfortunately new mountain bike opportunities in Point Reyes Seashore and on GGNRA lands has been absent. It is time to review current connectivity gaps and loop opportunities for mountain biking. All improvements for mountain biking can also be shared with hikers and the two uses are very compatible. Also note that Access4Bikes can organize volunteer days to offset the financial burden of trail development/improvement. We are ready to help! Here are the access improvements we are interested in seeing developed:

A new trail between Devils Gulch and Platform Bridge through the Cheda, McIsaac, and Zanardi Ranches.

A plan to connect the Cross Marin Trail into Point Reyes.

Adoption of social trails off Bolinas Ridge for better connectivity and a single-track trail experience.

Extend the Olema Valley Trail to Bolinas on the east side of Highway 1.

Close gaps for bikes through ranch lands in the park, including closing the Estero Trail loop, connecting Sir Francis Drake Blvd. with Pierce Point Road, and connecting Marshall Beach to Pierce Point Road,

A more bike-friendly permit application process for road and mountain bike events in the park, including along Bolinas Ridge and out to the lighthouse.

Bike access to all ranch roads in the pastoral zone that are already open to pedestrians.

Again, thank you for the opportunity to comment.

#1090

Name: D, H

Correspondence: There are so many fine possible opportunities for trail users but here are the main access improvements we are interested in seeing developed:

A new trail between Devils Gulch and Platform Bridge through the Cheda, McIsaac, and Zanardi Ranches.

A plan to connect the Cross Marin Trail into Point Reyes. Give us the opportunity to stay off Sir Francis Drake Blvd!!!!!!!!!!!!

Adoption of social trails off Bolinas Ridge for better connectivity and a single-track trail experience. The land is there and beautiful, why not let us enjoy it!?!?!?

Extend the Olema Valley Trail to Bolinas on the east side of Highway 1. Another opportunity to allow us a way off a major roadway.

Close gaps for bikes through ranch lands in the park, including closing the Estero Trail loop, connecting Sir Francis Drake Blvd. with Pierce Point Road, and connecting Marshall Beach to Pierce Point Road,

A more bike-friendly permit application process for road and mountain bike events in the park, including along Bolinas Ridge and out to the lighthouse. Bikes are a great form of transportation and recreation. Why discriminate and limit and restrict access to such a quiet, useful, and historically used mode of transportation??????

Bike access to all ranch roads in the pastoral zone that are already open to pedestrians. The roads are there, have had automobiles on them, so why not allow the small tread of a bike to an existing road?

Thank you for considering comments and suggestions to your future. PT Reyes is a special place, and restricting or limiting user experience is not right.

#1091

Name: N/A, N/A

Correspondence: We need access in the dirt to point Reyes how great would that be.

#1092

Name: Noll, Hilary

Correspondence: I support the proposed bike trail extensions and access on GGNRA lands. Particularly, a new trail between Devil's Gulch and Platform Bridge through the Cheda, McIsaac, and Zanardi Ranches. As well as a trail connecting the Cross Marin Trail into Point Reyes. Other good ideas include: Adoption of social trails off Bolinas Ridge for better connectivity and a single-track trail experience. Extend the Olema Valley Trail to Bolinas on the east side of Highway 1. Close gaps for bikes through ranch lands in the park, including closing the Estero Trail loop, connecting Sir Francis Drake Blvd. with Pierce Point Road, and connecting Marshall Beach to Pierce Point Road, A more bike-friendly permit application process for road and mountain bike events in the park, including along Bolinas Ridge and out to the lighthouse. Bike access to all ranch roads in the pastoral zone that are already open to pedestrians. Thank you.

#1093

Name: dommen, willy

Correspondence: I want convey my support for the following projects to create safe, enjoyable and environmentally friendly bike access to public lands:

A new trail between Devil's Gulch and Platform Bridge through the Cheda, McIsaac, and Zanardi Ranches.

A plan to connect the Cross Marin Trail into Point Reyes.

Adoption of social trails off Bolinas Ridge for better connectivity and a single-track trail experience.

Extend the Olema Valley Trail to Bolinas on the east side of Highway 1.

Close gaps for bikes through ranch lands in the park, including closing the Estero Trail loop, connecting Sir Francis Drake Blvd. with Pierce Point Road, and connecting Marshall Beach to Pierce Point Road,

A more bike-friendly permit application process for road and mountain bike events in the park, including along Bolinas Ridge and out to the lighthouse.

Bike access to all ranch roads in the pastoral zone that are already open to pedestrians.

#1094

Name: Carolan, Kate

Correspondence: In elements common to All Actions it fails to lists birding access in the planning area. Please include. Protect our birding areas and make sure birders have access. Please do not expand bike access and make our park a bike land. Please, no ranch expansion. No higher numbers of animals, cows or chickens and no new animal industry like pigs. No veal cages. Park needs to monitor numbers of animals and practices and enforce rules. Alternative B is good except reduce the acres of ranches as in Alt D. Existing leases should run out and not be renewed to non family members. Those that sold and leased land back can remain until the last heir or if the family decides to stop ranching. No concessions on the ranches. No new leases to non family members Ranches must raise animals organically and treat the land as such. Park has to inspect and maintain these rules. Park may and should help these ranches attain these goals. Manage the elk by translocation or culling but keep numbers in check. Help ranchers with damage. No grape growing! Please have the EIS address these issues.

#1095

Name: Tompkins, Laura

Correspondence: I'd like to add another comment about asking to increase biker access to Pt Reyes National Seashore area Public Lands. Not everyone can afford to own or rent horses. Bikes are an affordable way to roam these beautiful lands. Please Establish whatever signs, rules and fees needed to make trails accessible to bikes and not just hikers or people on horses. I encounter hikers and horses on my MTB rides in various places in Marin and it all works out. People just need to be informed as to what the correct trail etiquette.

#1096

Name: greenberg, scott

Correspondence: Please allow my. bikes on the trails. I was born and raised here and it's a travesty that bikes have outlawed at Pt. Reyes and in Marin. As a kid I use to bike on my. tam and there is no reason why the parks and my. tam can not have alternate use days so mt. bikers can ride legally 2-3 days a week . Santa Cruz, Colorado, etc are examples of very successful alternating programs.

#1097

Name: Berry, Robyn

Correspondence: Dear National Parks:

I coach the Drake Boys Cross Country team. We would love to run in the Pt. Reyes National Seashore. Due to the volume of runners, I coach them on a mountain bike. I would love to be able to take them on the complete Bear Valley Trail (to Arch Rock) and on Pierce Point Trail. Because Mountain Bikes are not allowed there, I am not comfortable letting them run there by themselves. I would like to request that these 2 trails are opened up. I want to explain our specific use because it is a request of safety. I can't have runners on our national parks unsupervised. If we have mountain bike access, then I can introduce the runners to more amazing places to run while being able to supervise the activities.

We are all great stewards of our wonderful national parks. If we can get more kids out there with proper supervision, then we can create the next generation of caring stewards as well!

(In the past, I have communicated with the Park Supervisor to request a specific one day approval for this, but was denied.)

Thank you for your consideration and for your thoughtful stewardship of our parks.

Robyn Berry Drake Cross Country

#1098

Name: Furer, Heidi

Correspondence: Please preserve the Wilderness area in Pt. Reyes. National Park as Congress intended. I am retired and spend most of my free time horse back riding in beautiful areas that God created. I sometimes call these areas "eye feast" due to the unusual beauty in the area. On horse back one can keep their eyes on the outstanding scenery, without looking where the riders foot or horses foot lands, knowing the horse will take care of both. The bikers must keep their eyes on the trail, directly in front of them. Why do they need these small additional trails when most of the trails on government land is open to them? Please save the limited Wilderness areas for the hikers and horse back riders. We also enjoy the solitude that bikes do not allow.

The bikers love to race or go as fast as they can and when that is down hill it is extremely dangerous to all, especially a horse and it's rider. The bikers don't see the horse until it is too late and they either run into the horse or come very close to running into the horse. Either way, the situation will frighten the horse probably causing it

to turn 180 degrees and run, which will cause a large percentage of riders to fall and a percentage of those will sustain injuries or fatalities.

Please preserve all our Wilderness Areas.

Very sincerely,

Heidi Furer

#1099

Name: Smith, Harvey

Correspondence: I am frequent visitor to the GGNRA and to Point Reyes. I am also a NPS volunteer in Rodeo Valley. I have operated a horse ranch on public land where my lease was subject to various environmental quality standards. Additionally I am part of a cooperative that manages 500 acres of pasture with horses through a lease from the East Bay Municipal Water District. I am familiar with the principles and practice of rangeland management and would like to raise several general issues related to the Environmental Impact Statement (EIS) for a General Management Plan Amendment. The mandate for Point Reyes National Seashore is clear: 1. "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. "preserve for public use and enjoyment certain areas ... possessing outstanding natural, historic, scenic, and recreational values, and ... provide for the maintenance of needed recreational open space necessary to urban environment and planning;" 3. "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." NPS purchased land from ranching families for many millions of dollars with the knowledge of the ranchers that their leases were to be time-limited in use and occupancy. Since that time politics has intervened, but the original language is still in place although perhaps not honored. However, clearly ranching activity was not mandated to exist in perpetuity. These are many historic ranches within park boundaries. Their legacy should be honored with interpretation and perhaps with model operations that could serve useful educational purposes. Planning obviously needs to be done to balance the needs of park visitors and the natural environment. For a period of time, some ranching will be necessary to manage safely fuel loads in this era of increased drought and fire danger. However, monitored accountability for environmental quality should be a condition for any ranching lease renewals. The issue of tule elk versus cattle certainly should be given context. California has over 5 million milk and beef cows. Do we really need to be sacrificing tule elk in favor of cattle on the Point Reyes National Seashore? Cattle are certainly winning in this state as tule elk struggle to come back from what was the brink of extinction. With appropriate oversight and management, limited pasturing of domestic animals on rangeland can have beneficial impact. This does not seem to be how the cattle ranches are currently being used, and certainly an expansion of agricultural uses is not warranted. The needs of the two dozen families that currently hold agricultural leases/permits in the National Seashore should certainly not outweigh the over 2.5 million visits of park users or the importance of maintaining the environmental quality of the land and the diversity of animal species.

#1100

Name: pouteau, j.

Correspondence: Please expand access for bicycling in point reyes national seashore. Please relocate tule elk to north eastern California and reestablish the traditional herding area in the national forests. These are two simple requests that can be easily accomplished with input from the community. Thank you, j.c. pouteau

#1101

Name: hennessey, keith

Correspondence: "Thank you for the opportunity to comment. Access4Bikes represents approximately 3000 local mountain bike enthusiasts. Mountain biking has grown much in popularity and now represents your second largest user group at around 40%. Unfortunately new mountain bike opportunities in Point Reyes Seashore and on GGNRA lands has been absent. It is time to review current connectivity gaps and loop opportunities for mountain biking. All improvements for mountain biking can also be shared with hikers and the two uses are very compatible. Also note that Access4Bikes can organize volunteer days to offset the financial burden of trail development/improvement. We are ready to help! Here are the access improvements we are interested in seeing developed:

A new trail between Devils Gulch and Platform Bridge through the Cheda, McIsaac, and Zanardi Ranches.

A plan to connect the Cross Marin Trail into Point Reyes.

Adoption of social trails off Bolinas Ridge for better connectivity and a single-track trail experience.

Extend the Olema Valley Trail to Bolinas on the east side of Highway 1.

Close gaps for bikes through ranch lands in the park, including closing the Estero Trail loop, connecting Sir Francis Drake Blvd. with Pierce Point Road, and connecting Marshall Beach to Pierce Point Road,

A more bike-friendly permit application process for road and mountain bike events in the park, including along Bolinas Ridge and out to the lighthouse.

Bike access to all ranch roads in the pastoral zone that are already open to pedestrians.

Again, thank you for the opportunity to comment."

#1102

Name: Gonzalez, Lucio

Correspondence: I am against bicycles on those trails. They should remain for hikers only.

#1103

Name: Kerby, Michael

Correspondence: I prefer this option ...No Ranching and Expansion of Tule Elk in the Planning Area-

#1104

Name: Gonzalez, Margrit

Correspondence: Those trails should remain for hikers only.

#1105

Name: Skyvara, Zdenek

Correspondence: Thank you for the opportunity to comment. Access4Bikes represents approximately 3000 local mountain bike enthusiasts. Mountain biking has grown much in popularity and now represents your second largest user group at around 40%. Unfortunately new mountain bike opportunities in Point Reyes Seashore and on GGNRA lands has been absent. It is time to review current connectivity gaps and loop opportunities for mountain biking. All improvements for mountain biking can also be shared with hikers and the two uses are very compatible. Also note that Access4Bikes can organize volunteer days to offset the financial burden of trail

development/improvement. We are ready to help! Here are the access improvements we are interested in seeing developed:

A new trail between Devils Gulch and Platform Bridge through the Cheda, McIsaac, and Zanardi Ranches.

A plan to connect the Cross Marin Trail into Point Reyes.

Adoption of social trails off Bolinas Ridge for better connectivity and a single-track trail experience.

Extend the Olema Valley Trail to Bolinas on the east side of Highway 1.

Close gaps for bikes through ranch lands in the park, including closing the Estero Trail loop, connecting Sir Francis Drake Blvd. with Pierce Point Road, and connecting Marshall Beach to Pierce Point Road,

A more bike-friendly permit application process for road and mountain bike events in the park, including along Bolinas Ridge and out to the lighthouse.

Bike access to all ranch roads in the pastoral zone that are already open to pedestrians.

Again, thank you for the opportunity to comment." Zdenek SKyvara

#1106

Name: pastalka, tomas

Correspondence: I would like to support opening trails in Point Reyes to mountain bikes and developing of well design trails. I am 72 years old and mountain bikes are now only way for me to access some areas that are that I can not reach on foot. Thank you for considering my request.

#1107

Name: Rapp, Zebulah

Correspondence: I am requesting better bike access for all areas in and around point reyes. Bike access is a fundamental way I explore areas with my family. Point Reyes is a unique area that could allow for interesting bike-packing opportunities. I see biking as a way to explore areas with my family that I could not get to by hiking alone. Please allow more bike access.

#1108

Name: Hamstra , Richard

Correspondence: As a bicyclist I feel all biking should be restricted to paved roads. The park is very heavily impacted by human activity and doesn't need the added burden of bikes, which tear up the trails at a rate which can not be sustained.

#1109

Name: Siglin, Roger

Correspondence: As a retired NPS ranger and avid hiker and wilderness enthusiast I oppose any effort to open up more trails to mountain bikers. They move too fast to be compatible with hikers and horseback riders.

#1110

Name: Weltken, Jacquelynn

Correspondence: Point Reyes NP is a true treasure and retreat in the wilderness. I am not opposed to cyclists being granted better access through Ranch lands or main roads. I have seen a few times personally in Marin in Golden Gate national recreation area cyclists in areas where they are not supposed to be allowed. I'd say this didn't interrupt my own experience but do feel if there was multiple cyclists whizzing around the wilderness it would. Would like to have access available for everyone but hopefully everyone will respect the rules.

#1111

Name: N/A, N/A

Correspondence: I think it's absolutely ridiculous to pass a law that would harm these elks already facing so many problems in nature. It is our job to protect the wildlife of our nature. Do not allow this law or laws like it to pass that would harm the wildlife.

#1112

Name: Muhler, Eric

Correspondence: I would like to voice my support for expanded trails in the Federal lands of Marin County. Currently there are too many trails that do not connect areas within the parks and a dearth of trails legal for multi-use that includes bicycles. I am in strong favor of the following projects being authorized and built:

A new trail between Devils Gulch and Platform Bridge through the Cheda, McIsaac, and Zanardi Ranches.

A plan to connect the Cross Marin Trail into Point Reyes.

Adoption of social trails off Bolinas Ridge for better connectivity and a single-track trail experience.

Extend the Olema Valley Trail to Bolinas on the east side of Highway 1.

Close gaps for bikes through ranch lands in the park, including closing the Estero Trail loop, connecting Sir Francis Drake Blvd. with Pierce Point Road, and connecting Marshall Beach to Pierce Point Road,

A more bike-friendly permit application process for road and mountain bike events in the park, including along Bolinas Ridge and out to the lighthouse.

Bike access to all ranch roads in the pastoral zone that are already open to pedestrians.

Thank you for soliciting this public input for a better trail system and enhanced opportunity and access for all trail users

#1113

Name: Caufield, Catherine

Correspondence: GMP Amendment c/o Superintendent Cecily Muldoon Point Reyes National Seashore 1 Bear Valley Road Point Reyes Station, CA 94950 November 30, 2018

Dear Superintendent Muldoon,

I would like to comment on the Point Reyes National Seashore GMP Amendment (PGMPA).

I do not support any of the proposed alternatives. There should be an alternative that allows continued low-intensity ranching in areas with a history of ranching, as long as that ranching is compatible with the National Park Service's mission to protect natural resources and provide public education and recreation. Ranching in PRNS should not be considered a right-for the original owners, their descendants, or anyone else. Moreover, more information is needed before any alternative can be chosen.

1. It is impossible to properly evaluate the impacts, including cumulative impacts, of proposed alternatives, with the information provided. To take just one example, it is unclear whether "diversification" refers only to different forms of agriculture, including more intensive farming systems, or also to a wider range of activities, including retail operations. For another example, tule elk management is a critical issue. The existing managed tule elk herd plays an important ecological and visitor-engagement role. Discussion of eliminating or reducing the tule elk is premature without hard data about the Park's carrying capacity and the herd's impact on ranching operations.

2. Although the Amendment being considered is an amendment to the current (1980) GMP, that plan is not being followed at present. Areas that are zoned natural and environmental protection reserves are being used for ranching. Implementation of the 1980 GMP Proposed Action should be included as a future alternative, although some data in that plan, such as visitation levels and economic impacts, are out-of-date.

3. Much of the PGMPA planning area is adjacent to the Philip Burton Wilderness and will have direct, indirect, and cumulative impacts on the wilderness values of that area. And yet, the PRNS does not have a wilderness plan as required by law. In addition, more data and baseline studies are needed to meet the legal requirement that the Philip Burton Wilderness is managed to maintain its wilderness character.

4. PRNS ranchers pay significantly less than market rates for the public land they ranch on. There is no reason to assume that should or will continue in perpetuity, and certainly not that the level of resource exploitation or ecological impact should be allowed to intensify. If lease renewal is allowed, there should be a competitive public process and a fair market rent, and not an assumption that families that sold their land to the NPS many decades should have a right to continue farming there. Likewise, a history of ignoring Park regulations or creating damage to natural resources should be considered a disqualification when a lease comes up for renewal. The entire lease process should be, like the land being leased, public.

5. The argument is often made that ranching operations in PRNS are key to the viability of agriculture in Marin and Sonoma County. This argument is not explicitly put forward in the planning documents I have seen, but it underpins much of the pressure for continuation of agriculture in the Park. This argument should not be used—explicitly or implicitly—in support of continuing agricultural practices on National Seashore land without actual data. In addition, historic ranching operations, as practiced before the area became a National Park, should not be conflated with intensive commercial operations, such as water-intensive row-cropping, agricultural manufacturing, and retail sites.

6. The Public Lands Conservancy has suggested including a new alternative titled "Preserving Historic Beef and Dairy Ranching" (PHBDR). This alternative would allow beef and dairy ranching in PRNS/North GGNRA to continue into the future, but would focus on the existing beef and dairy operations and would be aimed at preserving the current agricultural uses in the park and assuring that natural resources and visitor experiences are being adequately protected. I support this idea for protecting historic agricultural operations and protecting the core mission of the National Park Service, which is to protect natural resources and provide public education and recreation.

Thank you for this opportunity to comment.

Sincerely, Catherine Caufield

#1114

Name: N/A, N/A

Correspondence: Please improve trail access to bikes.

#1115

Name: Fisch, Steve

Correspondence: Please improve bike access in the park. It's a low-impact way to access the park, but too much of the trail system is closed to bikes for inadequate reasons. I support the efforts of Access4Bikes and MCBC to responsibly increase access. Thank you for all that you do to preserve and protect our backyard national treasure!

#1116

Name: Stoneback, S

Correspondence: Opening up access to bicycles in Point Reyes National Seashore is a great idea. I've been riding the legal trails, fire roads and streets out there for years and have always wondered what the holdup is for allowing bicycles in many of these remote areas. Many trails are used infrequently and are difficult for average tourists to access. In my opinion these areas are best explored by bicycle. Additionally, many of the established trails are well-suited for bicycles.

One of my favorite excursions was a camping trip out to Wildcat Camp. I rode in by bike along the Stewart Trail. It was great. My biking impact on the area was negligible. This area has vehicle access for servicing the campground, it makes perfect sense to allow bicycles on the trails around there.

Closing gaps in current legal trails and areas is important, so that riders can get from point A to point B. I wholly support the idea of filling in the missing links to provide trail access where there was none, or update existing trails to allow multi-use. We have this magical gem of a park and the Park Service should be encouraging access, especially when it comes to non-motorized access.

#1117

Name: Ferron, Suzannah

Correspondence: Tule Elk should not be killed or compromised through relocation as a result of problematic cattle management by ranchers. This makes no sense, and it is not how I want public funds, public lands, or wildlife to be treated.

If a species should be removed from Point Reyes or made to have a more limited area, it is the cattle, not the wildlife that live there and are part of the natural ecosystem. Ranchers should be able to provide for their own cattle without encroaching on and sickening wildlife. Instead of killing and relocating Tule Elk, perhaps more efforts could be directed at keeping cattle healthy and minimizing encroachment on Tule Elk habitat.

As fires have raged across California and will continue to do so due to human-caused climate change, we simply cannot afford to continue to wipe out wildlife and habitat to make things more convenient for private businesses. This is 1950s thinking, and it no longer serves our current reality. It this time of environmental crisis, we need public funds and attention to be focused on restoring habitat (which also serves as a carbon sink for mitigating climate change) and protecting wildlife.

Thank you for your time and consideration.

#1118

Name: N/A, N/A

Correspondence: Thank you for the opportunity to comment. Access4Bikes represents approximately 3000 local mountain bike enthusiasts. Mountain biking has grown much in popularity and now represents your second largest user group at around 40%. Unfortunately new mountain bike opportunities in Point Reyes Seashore and on GGNRA lands has been absent. It is time to review current connectivity gaps and loop opportunities for mountain biking. All improvements for mountain biking can also be shared with hikers and the two uses are very compatible. Also note that Access4Bikes can organize volunteer days to offset the financial burden of trail development/improvement. We are ready to help! Here are the access improvements we are interested in seeing developed:

A new trail between Devils Gulch and Platform Bridge through the Cheda, McIsaac, and Zanardi Ranches.

A plan to connect the Cross Marin Trail into Point Reyes.

Adoption of social trails off Bolinas Ridge for better connectivity and a single-track trail experience.

Extend the Olema Valley Trail to Bolinas on the east side of Highway 1.

Close gaps for bikes through ranch lands in the park, including closing the Estero Trail loop, connecting Sir Francis Drake Blvd. with Pierce Point Road, and connecting Marshall Beach to Pierce Point Road,

A more bike-friendly permit application process for road and mountain bike events in the park, including along Bolinas Ridge and out to the lighthouse.

Bike access to all ranch roads in the pastoral zone that are already open to pedestrians.

Again, thank you for the opportunity to comment.

#1119

Name: N/A, N/A

Correspondence: Opening all the park for wild animals by not extending the farm leases will be beneficial to both people and animals. The US does not have a shortage of farmland to the extent we need farms in our National Parks. This is the only National Park with farm buildings located within it (I believe). The dairies are particularly questionable since we have an oversupply: <http://www.thebullvine.com/news/in-depth-oversupply-of-milk-low-prices-cause-concern-for-us-dairy-farmers/>

#1120

Name: N/A, N/A

Correspondence: Opening all the park for wild animals by not extending the farm leases will be beneficial to both people and animals. The US does not have a shortage of farmland to the extent we need farms in our National Parks. This is the only National Park with farm buildings located within it (I believe). The dairies are particularly questionable since we have an oversupply: <http://www.thebullvine.com/news/in-depth-oversupply-of-milk-low-prices-cause-concern-for-us-dairy-farmers/>

#1121

Name: White, Ken

Correspondence: Hello,

As a long-time high school mountain bike coach, and an avid hiker and runner, I've traversed every trail and fire road in Marin.

I appreciate the efforts being made to balance access for all people and critters and plants and ecosystems.

It's also highly likely that providing appropriate connection routes, as well as sensible access for mountain bikers would greatly enhance safety and the overall experience for everyone who uses these beautiful roads, trails, and lands.

Here are the access improvements to consider:

A new trail between Devils Gulch and Platform Bridge through the Cheda, McIsaac, and Zanardi Ranches.

A plan to connect the Cross Marin Trail into Point Reyes.

Adoption of social trails off Bolinas Ridge for better connectivity and a single-track trail experience.

Extend the Olema Valley Trail to Bolinas on the east side of Highway 1.

Close gaps for bikes through ranch lands in the park, including closing the Estero Trail loop, connecting Sir Francis Drake Blvd. with Pierce Point Road, and connecting Marshall Beach to Pierce Point Road,

A more bike-friendly permit application process for road and mountain bike events in the park, including along Bolinas Ridge and out to the lighthouse.

Bike access to all ranch roads in the pastoral zone that are already open to pedestrians.

Thank you for your good work,

Ken

#1122

Name: Richardson, Arthur

Correspondence: I would like to say that access to multi-use trails in Marin of the utmost importance to me. As a hiker and cyclist, I value trails that I can access both on foot and by bike. There is a growing amount of trails that I can ride my bike on, but I think that there is a general sense of the vilification of mountain bikers in Marin County. I believe the best way to counter this is by having trails open to equestrians, hikers, and cyclists. At least that way a dialogue can start between the various types of trail users. The amount of NPS land that would be excellent riding and hiking is vast. Please include more bicycle access in your plan!

#1123

Name: Faircloth, Jason

Correspondence: I am in full support of the Marin County Bicycle Coalition's proposals with regard to increased bicycle access to trails in the PRNS. Sensible connections to and through, the PRNS from Marin's other managed lands are long overdue. Furthermore, I reject the Marin Conservation League's environmental argument against bicycle use on the pasture lands. I can think of no more environmentally damaging use of open space than cattle ranching. I am not opposed to ranching on the NP lands, but excluding bikes for environmental reasons is simply not rational.

Thank you.

Jason

#1124

Name: Marcianelli, Marla

Correspondence: No native wildlife should be killed for cattle grazing on national Park property. This is a disgrace and the cattle should be removed NOT the elk.

#1125

Name: Fehlhaber, Ted

Correspondence: I fully support the expanded bike access on non-wilderness roads and trail. Connecting pt reyes to the Cross marin trail would be huge and make is safer, avoiding riding Olema hill.

Closing loops would be great. Bikers love a loop. Adopting social trails would give bikes some legal fun riding and keep them off of the illegal stuff. This would prevent erosion and support good management of the lands. Bolinas ridge is an under used gem. It would be great to open it up more.

Thanks for including bikes in the planning.

#1126

Name: Becker, Robert

Correspondence: Please consider expanding legal bike access. The current restrictions are outdated and discourage residents from getting outside and enjoying trails.

#1127

Name: N/A, J

Correspondence: So many mountain bikers are tearing up our hiking trails, wilderness areas, and endangering wildlife and hikers. They have no regard for anything!!! Make it a law to keep them out of and off of these areas!!!

#1128

Name: Stein, Chris

Correspondence: To whom it may concern,

I am writing in support of the following access improvement and reforms at the Point Reyes National Seashore:

A new trail between Devils Gulch and Platform Bridge through the Cheda, McIsaac, and Zanardi Ranches.

A plan to connect the Cross Marin Trail into Point Reyes.

Adoption of social trails off Bolinas Ridge for better connectivity and a single-track trail experience.

Extend the Olema Valley Trail to Bolinas on the east side of Highway 1.

Close gaps for bikes through ranch lands in the park, including closing the Estero Trail loop, connecting Sir Francis Drake Blvd. with Pierce Point Road, and connecting Marshall Beach to Pierce Point Road,

A more bike-friendly permit application process for road and mountain bike events in the park, including along Bolinas Ridge and out to the lighthouse.

Bike access to all ranch roads in the pastoral zone that are already open to pedestrians.

Mountain biking represents the second-largest user group in the seashore with 40 percent of users. The opening of these areas is vital for the safety of cyclists, as they will improve trail connectivity that will keep cyclists off increasingly congested West Marin roads. These improvements can also be shared with hikers as the user groups are complementary and without any safety drawback.

I urge the Point Reyes National Seashore to adopt these improvements.

Sincerely,

Chris Stein

#1129

Name: Lewis, Deborah

Correspondence: Am writing this to protest the proposed increase access for bikers in Pt. Reyes Wilderness Land. After all the work done to move the dairy cows etc., to change over to quiet trails for walking and horse riders, to allow the increase in bikers makes no sense at all. I am a long-time hiker, 40 years in Marin. We all know how not helpful 'on your left' is for older people hard of hearing and, disconcerting for some of us younger people, knowing they might bike up at any time behind one, not a pleasant experience for a hike. I have seen walkers get hit by the cyclists. Cyclists just don't find slowing down to be necessary. Careless about safety. My friends worked overnight overtime, to undo illegal trails and watch out for illegal cyclist trail builders 2 am they show up. Point is, they have plenty of cycling trails already, 75% of trails. This Pt. Reyes wilderness should be kept as such. Once the cyclists have legal right, it's impossible for rangers to curtail them. They race through Miwok Stables near where I live, though not supposed to (are to walk their bikes through instead of riding but I have seen them just race through, so inappropriate). Please deny the cyclists' request for trails out at Pt. Reyes.

#1130

Name: Clinton, Roarke

Correspondence: Please remove cattle and dedicate Point Reyes to wildlife.

#1131

Name: Cunningham, Blair

Correspondence: Please, PLEASE give serious consideration to allowing improved bicycle access to non-wilderness areas of the Point Reyes NP. My family has hiked and cycled the area for over 50 years and have always felt that the off-road cycling community has been unfairly disenfranchised although we have the potential to be your biggest supporters. It's a shame that a few vocal hikers and equestrians have been allowed to monopolize this wonderful shared resource.

Sincerely,

Blair Cunningham

#1132

Name: Chacon, Julio

Correspondence: Please allow trail use for mountain bikers. Mountain biking is an activity that promotes better health habits, which will reduce medical health costs in the long run. It is about time that hikers, horse riders and mountain bikers get along and share spaces.

#1133

Name: Martin, Dana

Correspondence: Bike access in Pt Reyes is important to me! Please and thank you!

#1134

Name: Fuchs, Adam

Correspondence: Thank you for the opportunity to comment. Access4Bikes represents approximately 3000 local mountain bike enthusiasts. Mountain biking has grown much in popularity and now represents your second largest user group at around 40%. Unfortunately new mountain bike opportunities in Point Reyes Seashore and on GGNRA lands has been absent. It is time to review current connectivity gaps and loop opportunities for mountain biking. All improvements for mountain biking can also be shared with hikers and the two uses are very compatible. Also note that Access4Bikes can organize volunteer days to offset the financial burden of trail development/improvement. We are ready to help!

Here are the access improvements we are interested in seeing developed:

A new trail between Devils Gulch and Platform Bridge through the Cheda, McIsaac, and Zanardi Ranches.

A plan to connect the Cross Marin Trail into Point Reyes.

Adoption of social trails off Bolinas Ridge for better connectivity and a single-track trail experience.

Extend the Olema Valley Trail to Bolinas on the east side of Highway 1.

Close gaps for bikes through ranch lands in the park, including closing the Estero Trail loop, connecting Sir Francis Drake Blvd. with Pierce Point Road, and connecting Marshall Beach to Pierce Point Road,

A more bike-friendly permit application process for road and mountain bike events in the park, including along Bolinas Ridge and out to the lighthouse.

Bike access to all ranch roads in the pastoral zone that are already open to pedestrians.

Again, thank you for the opportunity to comment.

#1135

Name: Amdensone, Christine

Correspondence: I WOULD LIKE TO EXPRESS MY CONCERN ABOUT LOSING THE NATURAL CAPITAL VALUE OF THE TULE ELK- THIS SAME ARGUMENT CAN BE MADE FOR THE BISON HERDS OF YELLOWSTONE NATIONAL PARK- YES-MANAGE THE HERD- NO DO NOT ERADICATE THE TULE ELK.

#1136

Name: Simpson, David

Correspondence: Here are the access improvements I am interested in seeing developed:

A new trail between Devils Gulch and Platform Bridge through the Cheda, McIsaac, and Zanardi Ranches.

A plan to connect the Cross Marin Trail into Point Reyes.

Adoption of social trails off Bolinas Ridge for better connectivity and a single-track trail experience.

Extend the Olema Valley Trail to Bolinas on the east side of Highway 1.

Close gaps for bikes through ranch lands in the park, including closing the Estero Trail loop, connecting Sir Francis Drake Blvd. with Pierce Point Road, and connecting Marshall Beach to Pierce Point Road,

#1137

Name: Bartlett, Julia

Correspondence: Dear Superintendent Muldoon, As far as lease length is concerned about ranches, I'm in favor of the minimum 20 year lease.

#1138

Name: N/A, N/A

Correspondence: No matter the management course of action, a strong PR push to educate the public on the course of action will be important in reducing any backlash from misconceptions. Of the proposed solutions, I do not support Park Service employee's culling the herds.

I am in favor of either the relocation of animals, or a well regulated hunting season for limited entry through a draw process. Steps could be taken to mitigate public/hunter conflict through allowing hunting on the ranch areas, closing specific hunting zones to public access for the few days the hunt is active, hunter education, archery only hunts on non ranch areas, cow tags for more effective population control, and involvement from conservation groups like the Rocky Mountain Elk Foundation.

#1139

Name: Davidow, Katheryn

Correspondence: Dear Sir, In 1962 the Park Service made a commitment to preserve agricultural lands in exchange for the sale of ranch land. Keep your commitment. Ken Salazar did not keep his in 2013. The ranches are part of the cultural and historical heritage of Point Reyes National Seashore.

Our president is trying to overthrow the 9B rules that keep our national parks safeguarded against development. This will destroy our beautiful lands for personal gain. I do not want an oil drilling rig nor any other machine set on Park lands that will drill, dig or suck up natural resources.

Keep your word and allow our parks to thrive by giving the ranchers the right to be stewards and to protect our lands.

#1140

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.) has teamed up with Rob Bishop (R-Utah) to make an end run around an ongoing public-planning process. I would also like to know why this has been brought up for House and Senate voting. 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."

#1141

Name: N/A, Eleanor

Correspondence: Dear superintendent,

I'm writing to express my concerns regarding the environmental impact statement.

1. Consider the impact on the Park and local communities of increasing tourism. What is the carrying capacity of this area- this should be studied. 2. Please study the impact of eliminating all ranching, or dairy ranching, on the park on the agricultural community in Marin-Sonoma. I understand that the feed mills are opporating at break-even. Less ranching in our area would likely mean the end of ranching in our counties.

#1142

Name: curley, terrence

Correspondence: I support MCBC and look forward to more access on the Point Reyes Trails..

A new trail between Devil's Gulch and Platform Bridge through the Cheda, McIsaac, and Zanardi Ranches.

A plan to connect the Cross Marin Trail into Point Reyes.

Adoption of social trails off Bolinas Ridge for better connectivity and a single-track trail experience.

An extension of the Olema Valley Trail to Bolinas on the east side of Highway 1.

Gap closures for bikes through ranch lands in the park, including closing the Estero Trail loop, connecting Sir Francis Drake Blvd with Pierce Point Road, and connecting Marshall Beach to Pierce Point Road.

A more bike-friendly permit application process for road and mountain bike events in the park, including along Bolinas Ridge and out to the lighthouse.

Bike access to all ranch roads in the pastoral zone that are already open to pedestrians.

Bikes have no access to the Wilderness Area, and we're asking for none!

#1143

Name: Combes, Colleen

Correspondence: As an equestrian and a frequent visitor to Pt. Reyes, I consider protecting Pt Reyes wilderness land to be critical. Allowing access to bicyclists opens the window to wilderness land overuse and misuse. If the trails were opened to bicyclists there would be excessive trail traffic with cycling demonstrably causing v-shaped erosion of trails, making the trails difficult to traverse for both hikers and horses. Mountain bikers often go off trails and create unsightly unauthorized tracks in parks, and adding to erosion issues. Finally, there are the dangerous encounters between equestrians and bicyclists, and hikers and bikers, especially on single-track trails with limited line of sight. Numerous accidents have occurred in these encounters where equestrians have been unable to get out the way of fast moving bicycles or do not have the time to prepare their horses for the encounter.

Keeping in mind the 75% percent of Marin County trails are already open to bicyclists, please allow hikers and riders the peace and quiet of a wilderness area that has no bicycle traffic.

Thank you,

Colleen Combes

#1144

Name: Glass, Andrea

Correspondence: I am urgently requesting that the Park Service not consider culling the Tulle Elk population and to work with the farmers and ranchers to come up with alternative plans such as re-locating the elk to an area nearby designated for their habitat. Also, ranchers need to consider containing their cattle in loser quarters whereby fences and dogs can be used to keep the Elk out.

The Elk were brought over to the Pt. Reyes Area many years ago . They should not be punished for flourishing here. There must be a compromise on the part of the ranchers-all alternative plans need to be scrutinized to allow the Elk to live!

#1145

Name: Watts, Jamison

Correspondence: November 28, 2018

Point Reyes GMP Amendment Superintendent Point Reyes National Seashore 1 Bear Valley Road Point Reyes Station, CA 94956

RE: Scoping Phase Comments on the Point Reyes National Seashore General Management Plan Amendment and Environmental Impact Statement

Superintendent Muldoon:

Marin Agricultural Land Trust (MALT) was founded in 1980 to protect Marin's agricultural land for agricultural use. Over the past 38 years, MALT has invested over \$86 million to permanently preserve the agricultural utility and natural resources on 85 Marin farms and ranches totaling over 53,000 acres. We also work regionally with agricultural landowners and public and private partners to support and enhance agriculture viability and sustainability. One-third of Marin County is in productive agricultural use, including the approximately 28,000 acres in PRNS and 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.

Because the continuation of sustainable agriculture in PRNS and GGNRA's north district directly affects our mission, MALT unequivocally supports the continuation of sustainable farming and ranching in these areas. Together, they represent nearly a fifth of Marin's agricultural acreage and production. If these agricultural operations disappear, we face losing the critical mass necessary to sustain suppliers, processors and other services crucial to the future of agriculture countywide. These ranches also represent a significant portion of the county's managed coastal grasslands, which through cattle grazing provide habitat for endangered species, sequester carbon, store water, support pollinators, reduce wildfire danger and control invasive plants.

The National Park Service (NPS) is seeking comments on what should be analyzed in the EIS, as well as potential refinements to the proposed action and alternatives. MALT respectfully offers the following comments:

Protecting and managing the diverse and important natural and cultural resources in the planning area • The affected farm families have upheld for nearly 40 years (1978 Public Law 95-625) their promises to manage natural and cultural resources in a manner consistent with agricultural lease/special use permits issued and audited by NPS. They have met detailed and specific range management program activities, terms and conditions. This includes compliance with San Francisco Regional Water Quality Control Board's water quality regulations for grazing livestock and dairy operation.

- Marin County completed its Climate Action Plan Update in 2015, and the agricultural community has demonstrated that it can be an important part of the solution to climate change through carbon farming and

carbon offsets. Alternatives should include NPS working directly and proactively with the Marin Resource Conservation District (MRCD) and Natural Resources Conservation Service (NRCS) to develop and implement carbon farm and/or conservation plans as appropriate.

- MALT works to secure the future of farming and ranching in Marin County through the conservation easements we purchase to protect the land from nonagricultural development. Once the easement is acquired, we take on the deep and permanent responsibility of supporting the landowner as they steward the land and its soil, water, plants and wildlife. Stewardship is a set of practices that maintain or improve the agricultural and natural values of the land. Some of the ways MALT supports stewardship include providing technical and financial assistance for restoration and rangeland improvement projects, offering information and resources on rangeland management, invasive weed control, and watershed health, and working with MRCD and NRCS to develop and implement carbon farm plans. Alternatives should include NPS playing a more active role in supporting the management outcomes they wish to see in the planning area.

Specific strategies for managing agricultural leases • 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 MRCD and NRCS require 10-20 year maintenance and monitoring agreements to qualify for their programs. Alternatives should include 20-year rolling leases in 1, 5, 10, or 20-year increments which would enable lessees to qualify for these programs on a consistent basis and better qualify them for bank loans.

Operational Flexibility • The absence of clear guidance for agricultural operations negatively affects the decision-making ability of the rancher and NPS field-level staff. The needs to reroof barns, manage invasive plants, and repair fences are a few examples of operational decisions that often are delayed. These delays have had financial and ecological impacts. Alternatives in the GMP Amendment will be stronger and have increased success in realizing the mutual benefits of working farms and ranches if they include guidelines to facilitate ranchers and NPS making real-time operational decisions. We support the statement in the Notice of Intent that "the proposed action would include opportunities for operational flexibility and diversification." 83 Fed. Reg. at 54776 (October 31, 2018).

Succession • Succession is essential to ongoing land management and stewardship in the planning area. Marin has benefited greatly from the successful transition through as many as five family generations. Additionally, hand-offs of agricultural property and operations to non-family members have gone successfully with agricultural production and environmental stewardship persisting. Successful succession from current to future agriculturalists is critical to the continuation of Marin's valued working landscapes. Therefore, Alternatives should have a plan for succession to new members of existing farm families and alternative agricultural candidates if that option is not presented.

Diversification • Diversification is a proven tool for the economic viability of both individual ranches and the broader community and it is a recognized and supported tenet in the Marin Countywide Plan. Diversification has enabled Marin's small and medium sized farms to be economically viable, build additional resiliency, and to avert the risks of business failure. This is especially important because these ranches do not benefit from economies of scale that larger operations enjoy. In effect, diversification has strengthened Marin's local family farms, local economy, and local food system. For these reasons, diversification on the PRNS and GGNRA ranches and dairies should be fully considered in any analyzed alternative so that it can be facilitated going forward. This includes, but is not limited to, farm processing, farm stays, farm tours, selected crop production, forage production, and farm sales.

Management of Tule elk • The NPS should include an alternative or modify existing alternatives that would remove the free-range elk herds (Drakes Beach and Limantaur) from the agricultural properties. This would provide the best solution for addressing ongoing conflicts that occur with historic ranching and cultural resources and is consistent with H.R. 6687 which states, "in areas of agricultural property where Tule Elk present conflicts with working ranches or dairies, the Secretary shall manage the Tule Elk for separation from the working ranches or dairies."

Wilderness designated lands and Pastoral/Ranch leased lands should be given equal protection corresponding to their intended use and purpose. Intended for nature preservation, Wilderness Areas are managed by resource specialists. Conversely, Pastoral Areas are intended to be managed for agricultural use by the "rancher". There should be little allowance for commingling resource use and management styles between them. When livestock are found in Wilderness, they are removed. Likewise, when Elk are found in Pastoral Zones, management methods should be used to control their population and remove their impacts.

As our society works to produce food for a growing world population in a sustainable manner, Point Reyes National Seashore should be viewed as an example - a place where all the ranchers work closely with the National Park Service to cooperatively manage the land in an economically viable and environmentally sustainable way. Furthermore, any alternative that might lead to a reduction in overall food production in the planning area should consider the social, environmental and economic costs of replacing that production elsewhere in the Sonoma-Marine region.

Thank you for the opportunity to comment on this phase of the GMP Amendment.

Sincerely, Jamison Watts Executive Director

Ralph Grossi Chairman of the Board

#1146

Name: Evans, Dolores and Dan

Correspondence: Dear Superintendent Cicely Muldoon, Thank you for the opportunity to comment on the Environmental Impact Statement (EIS) for a General Management Plan Amendment (GMP A) for Point Reyes National Seashore (PRNS) and North District of Golden Gate National Recreation Area (GGRNA). The first of our Ranches, H Ranch, sits on a sharp turn in Pierce Point Road overlooking Abbott's Lagoon and the Pacific Ocean within the Point Reyes National Seashore. We are a multi-generational family who produce high quality grass-fed, pasture raised beef on the coastal pastures of the Historic H & K Ranches. Dolores' grandparents, Domenico and Teresa Grossi first arrived in West Marin in the late 1800's, purchasing H Ranch in 1939. Alfred and Florence Grossi, Dolores' parents, operated a 400 cow dairy on the ranch until 1976, when we transitioned the ranch from milk to beef. Our rotational grazing and other conservation practices contribute to the scenic working landscape of the Point Reyes National Seashore. As generational Point Reyes Ranchers, we are grateful for having the opportunity to continue and enhance our family's business. We have the same connection to maintaining the health and productivity of the landscape, as our parents, grandparents and great-grandparents-who cared for it before. In 2008 we developed and introduced the Rossotti Ranch brand, producing some of the finest local meat available in the San Francisco Bay Area and beyond. We are committed to continuing our family's tradition of producing healthy food for our local community, while implementing sustainable, viable and environmentally friendly ranching practices that protect the land, water, and history of the Seashore.

Specific Comments We offer the following specific comments for consideration and recommendations for issue identification, refinement and analysis of the alternatives during the GMP Amendment planning process and environmental review under NEPA. We will participate fully in subsequent stages and opportunities to discuss the future of the GMP for the Pt. Reyes National Seashore and Golden Gate National Recreation Area. **Alternatives:** While the Settlement Agreement identified three alternatives that were to be evaluated in the Environmental Impact Statement (EIS), it is also clear that the National Park Service (NPS) is authorized to consider a full range of alternatives that we believe must include additional options for Point Reyes. The NPS GMP Notice of Intent includes three additional alternatives which we agree should be part of its review. Added to this list we urge consideration of several modifications or expansions of the existing list of alternatives referenced by NPS: We request an expanded alternative building off the "Continued Ranching alternatives" proposed by NPS whereby NPS would allow for limited additional opportunities in farming and diversified agricultural production to complement existing ranching practices. Ranching and dairy farming should continue in the agricultural 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 in the Seashore to the local

community and economy, and meet the larger goal of preserving this cultural, historic and scenic resource in the Seashore. We believe that such limited additional activities would provide multiple economic and educational benefits to the community and would strengthen the overall agricultural economy of our region. We are not proposing in this alternative expanding beyond the current 28,000 acres. In addition, we would ask that NPS consider a lease term beyond 20 years (25-30 years) for ranches and dairy operations. Lease length is directly related to the strength and viability of farming and ranching operations. Longer 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 soils, water and air quality, and assurances of farm employees' welfare. Longer leases would contribute even greater confidence and stability to the entire community of ranchers, employees and park visitors. Issues: We request that the GMP and EIS review and include a plan for succession to new members of existing ranch families and alternative agricultural candidates if that option is not presented. Succession is critical for the perpetuity of agriculture's management and stewardship contributions. The Seashore has benefited from successful transition from one generation to the next through as many as five family generations. Additionally, families who choose not to continue ranching operations, we ask for NPS to think through the issue of succession with the families of current leases, and then, if necessary, look to other parties interested in continuing ranching and agriculture at the Seashore. Alternatives in the GMP Amendment will be stronger and have increased success in realizing the mutual benefits of working farms and ranches if they include guidelines to facilitate ranchers and NPS making real-time operational decisions. The need for regular infrastructure maintenance, repair, and replacement along with management of invasive plants are a few examples of operational decisions that often are delayed. This is the operational flexibility that the field level partnership between the ranches and staff require to be successful. We support enhancing visitor experience through educational opportunities. We recommend that NPS explore the opportunity for visitors to learn about PRNS agriculture, its history, and the names and faces of the ranching families who are dedicated to achieving the synergy of a working landscape and environmental resource stewardship. The cultural, historic and scenic resources that have been preserved in the Seashore is the combination of the historic pastoral landscape and the multi-generational families that are managing them. The ranching families are the most direct link to 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 we manage exemplify and manifest the national movement to strengthen local food systems and community supported agriculture. Visitor experience would be enhanced by providing relevant cultural, historical, and natural interpretive information, (i.e. brochures, audio tours, signage) along the boundaries of the ranch operations. Diversification on the Seashore ranches and dairies should be fully considered in all analyzed alternatives so that it can be facilitated going forward. Diversification is a proven tool for the economic viability of both individual ranches and the broader community. Diversification has enabled Marin's small and medium sized farms to be economically viable, build additional resiliency, and to avert the risks of business failure. This is especially important because these ranches do not benefit from economies of scale that larger operations enjoy. In effect, diversification has strengthened Marin's local family farms, local economy, and local food system. Diversification can include selected planted or naturally occurring crops, additional livestock production, farm stands and retail sales, processing and value-added production, farm stays, farm educational tours, and expanded work with the school systems and 4-H organizations. We ask that consideration and analysis of on farm grown and stored livestock feed of silage and hay be included in this examination. This long standing farm practice combines the benefits of critical seasonal forage production combined with effective weed management. It also reduces the need for imported supplemental feed and incentivizes effective on site resource use and ranch resiliency. Seashore staff have previously been collaborators and partners amongst a broad group of agricultural support organizations in Marin County. We recommend that considered alternatives provide for the inclusion and enhancement of these partnerships and its ability to implement integrated farm production and environmental stewardship solutions. These partnerships have included Marin County departments such as the Agricultural Department, Community Development Agency, and Cooperative Extension. Federal agencies such as the United States Department of Agriculture Natural Resources Conservation Service and the National Organic Program are integral to this partnership. So too are community based organizations like the Agricultural Institute of Marin, Marin Agricultural Land Trust, and Marin Resource Conservation District. This partnership has provided the combined complementing missions and expertise in land use policy, agricultural and natural resource management, marketing and outreach, and education to accomplish precedent setting land conservation, environmental stewardship projects, and value-added farm production. The GMP Amendment is an opportunity to celebrate a more than 50 year partnership,

that has resulted in a working landscape with strong community ties, economy, and ecosystems. We thank you for the opportunity to provide our comments and we look forward to working with NPS on all subsequent stages of the GMPA.

#1147

Name: Ross, Ron

Correspondence: Hello, I'm writing to support to Marin bicycle club/counsel for trails connecting Pt. Reyes. I would hope these clubs could work together and compromise, for equal trail access. Marin is such a beautiful area, and you should be honor to have groups who work together, and all that bicycle history to be proud of. I live near SLO , and we also sometimes have issues. but we work those out by including Everyone. The local CCCMB, works with all municipalities, rangers, park planners, horse riding groups, and hikers for the past 28 years, and It's highly successful. It would be a shame to deny one group. I hope the council see's the potential here, to work together on this. Best Regards, Ron Ross (bay area native)

#1148

Name: Grossi, N/A

Correspondence: Our family has been ranching on the M Ranch for 6 generations. We know what it takes to be sustainable in the beef business. Our small beef operation produces approximately 130,000 pounds of beef each year. By the year 2050, the US population is projected to increase by 70 million people. Agricultural land is disappearing by approximately 2-3% annually. Who is going to provide food for the expanding population? Once land is taken out of agriculture, ifs never put back into food production. Congress' intent was to preseive the historical and cultural ranching families and the beauty of the seashore for visitor enjoyment. Agricultural lands were already being completely maintained by the ranchers. Grazing is an important part of the uses that NPS must provide on the seashore and should be the main use on the area of agricultural land that the NPS calls the pastoral zone. Unfavorable consequences have occurred where grazing has ceased. Abbots Lagoon is a prime example of eliminating grazing to protect endangered plant species. Cows were fenced out of a specified area to protect a rare plant, as to encourage additional plant growth; but instead all the plants in the ungrazed enclosure died. Grazing is a necessary environmental tool, and also a necessary component for carbon farming. Residual dry matter (RDM) measurements should allow a rancher to control stocking density rather than a preset number of cattle. The lands ability to cany specific numbers of cattle are largely dependent on weather conditions. Properly cared for land provides spectacular views. Pasture management is an extremely important issue. NPS provides little or no alternatives for controlling invasive weeds and encroaching brush. Before NPS, ranchers effectively and methodically controlled both. Spraying all but eliminated our ability to control all varieties of thistles. It used to be a yearly event-to spray thistles. All the rare plants are still alive and growing in those areas. Discing Iris and mowing Coyote brush was done routinely to control their growth; both are still thriving, (all too well). Clearing pastures provides an open area for birds of prey to control rodents and provide visitor observation of their hunting skills. These troublesome plants will never be eliminated, just partly controlled. We are always willing to work with NPS guidelines, compromise is an essential part of reaching common goals. We believe an advisory panel should be put in place to help facilitate this goal. Members from various land use agencies combined with ranchers and NPS would make a top notch team. This panel would expedite land management goals, creating compromises everyone can work with. Tule elk should be managed for effective separation from ranch lands. Elk and cattle intenngled, can not co-exist. There are areas in the US having the exact same problems with elk we are having. They also, are trying to create an elk management plan. Unmanaged, continuously growing elk herds are causing havoc on agricultural lands and even in populated areas. State Senator Kieth Wagoner who represents eastern Skagit County, WA favors letting land occupants shoot elk causing damage without waiting for a pennit. (1) Randy Good, Vice President Skagit County Cattlemens Association said some of the increasing elk herd on his land are limping with hoof rot, another concern for cattlemen. (2) NPS not only needs to separate elk from agricultural properties, the General Management Plan amendment needs to put an effective elk management plan in place for the elk to remain at controllable levels in their designated areas. Simply relocating elk only puts a bandaid on the problem. There are many more important and indepth issues we are concerned about. To save space and avoid repetition, we incorporate by reference and support the points in the scoping letter submitted by

the Point Reyes Seashore Ranchers Association and the longer and much more detailed scoping letter submitted by PRNS and GGNRA Family Ranchers. Each of the NPS alternatives have good and not so favorable parts. We ranchers have put together the Community Alternative that we believe provides for better management of agricultural property than the NPS alternatives. Please consider adding this alternative to the NPS Preferred Alternative. There have been 6 Generations on the M Ranch, and our goal is to pass down our ranch to our family for generations to come.

#1149

Name: O'Dell, Chris

Correspondence: Hello,

As a resident of Marin county I wanted to add my voice in support of bike access to trails in the Point Reyes area. It's my belief that increasing bike access yields benefits not only to individuals but to the trail system as a whole, though increased interest, advocacy and a sense of shared stewardship of these trails.

I understand in Marin there is often opposition to multi-use trails, but my experience as both a hiker and a cyclist on existing multi-use trails has been positive. Like any shared resource, it depends on folks being considerate of one another and 99% of the time that's what I see on the trail.

As far as the popular myth of bikes damaging trails, it's indisputable that both hooves and tires have more impact than footsteps. However, I've done enough springtime hiking in this area to understand that any trail that can survive horse traffic is unlikely to suffer much *additional* damage from cycling.

Thanks!

Chris O'Dell

#1150

Name: Hunting, Kathy

Correspondence: Dear Superintendent Muldoon,

I am writing with regard to two issues that should be considered in the EIS. - I urge the Park Service to include a rigorous analysis of visitor carrying capacity. The analysis should consider staffing and infrastructure necessary to protect our resources, keep the park clean and safe, and maintain sustainable visitor loads. Opportunities to expand day and overnight use should not be implemented without such an analysis. -Ranch lease length: I note a change in language from minimum 20-year leases (as secretary Ken Salazar committed to) to "up to year-year terms." Long-term leases support the viability of ranching by allowing investments in infrastructure and sustainable resource management.

Thank you for this opportunity to comment.

#1151

Name: N/A, N/A

Correspondence: Hi there, I am writing to submit comment in support of bicycling access improvement projects at Point Reyes National Seashore. I am a resident of Point Reyes and these improvements will improve safety, usability, and enjoyability of our local parks and trails. There have been some horrifying crashes in which car drivers have targeted people enjoying our area on bikes and hurt and killed them. Safety improvements like this will save lives and increase safety and improve culture here. These are the improvements I support:

A new trail between Devil's Gulch and Platform Bridge through the Cheda, McIsaac, and Zanardi Ranches.

A plan to connect the Cross Marin Trail into Point Reyes.

Adoption of social trails off Bolinas Ridge for better connectivity and a single-track trail experience.

Extend the Olema Valley Trail to Bolinas on the east side of Highway 1.

Close gaps for bikes through ranch lands in the park, including closing the Estero Trail loop, connecting Sir Francis Drake Blvd. with Pierce Point Road, and connecting Marshall Beach to Pierce Point Road,

A more bike-friendly permit application process for road and mountain bike events in the park, including along Bolinas Ridge and out to the lighthouse.

Bike access to all ranch roads in the pastoral zone that are already open to pedestrians.

#1152

Name: Brown, Maxwell

Correspondence: I support MCBC in it's efforts to ensure equal, safe access for all user groups including the under-represented biking user group for use on the trails in the Non-Wilderness areas of the Pt Reyes National Seashore. For far too long, this legitimate, growing user group has been excluded (and discriminated against by other groups) from access to these areas of Public Land! It's time to recognize that this land belongs to everyone and should be shared equally and fairly. Here is a list of the trails and projects that I support:

A new trail between Devil's Gulch and Platform Bridge through the Cheda, McIsaac, and Zanardi Ranches.

A plan to connect the Cross Marin Trail into Point Reyes.

Adoption of social trails off Bolinas Ridge for better connectivity and a single-track trail experience.

Extend the Olema Valley Trail to Bolinas on the east side of Highway 1.

Close gaps for bikes through ranch lands in the park, including closing the Estero Trail loop, connecting Sir Francis Drake Blvd. with Pierce Point Road, and connecting Marshall Beach to Pierce Point Road,

A more bike-friendly permit application process for road and mountain bike events in the park, including along Bolinas Ridge and out to the lighthouse.

Bike access to all ranch roads in the pastoral zone that are already open to pedestrians.

Thank you,

Maxwell Brown

#1153

Name: N/A, N/A

Correspondence: I absolutely do NOT support wiping out a species that is purely PROFIT motivated.

Point Reyes National Seashore is the ONLY national park in which Tule elk roam. Cattle ranchers should NOT be allowed to wipe out a species so their cattle can graze on the same land where the tule elk roam.

I do NOT support HR 6687. These elk must be protected.

#1154

Name: Frankel, Alex

Correspondence: To whom it may concern: I appreciate that NPS is interested in adjusting Pt Reyes National Seashore to include bikes. One suggestion I would make is to make a trail open so that riders can do a loop or a crossing of the park legally. If, for example, the trail from Bear Valley bike racks to Stewart Trail was legal, cyclists could ride through the park that way. Perhaps also there could be some other trails legalized that don't get much use by other users, such as in areas near Bolinas and Muddy Hollow Trail would be a great connector from Limantour Road to Estero trails. Thanks much, Alex Frankel

#1155

Name: Callaway, Kathy

Correspondence: Mainstreet Moms is a West Marin citizen action organization. We have, since 2004, been committed to securing a more viable future for our children through the education, engagement, bite-sized actions, and leadership of moms and honorary moms everywhere. It is through this lens that we are responding to the formal scoping phase of the Environmental Impact Statement for the Point Reyes National Seashore and North District of Golden Gate National Recreation Area. Thank you for the opportunity to submit our comments. Consistent with our previous input, Mainstreet Moms continues to support the continuation of ranching and dairy farming as the best and only way to ensure the benefits of vital agricultural production to the community, the local economy and visitor education and experience. And, we believe this position is consistent with and supports the legislation that established the Seashore and provided for ranching operations. It is also consistent with House bill H.R. 6687, sponsored by Congressman Huffman, that would amend the Seashore's enabling legislation to extend the leases and manage co-existence between elk and cattle. Visitor carrying capacity analysis The "Elements Common to all Action Alternatives" section discusses looking for opportunities to expand day use and overnight accommodations for visitors. Given the already heavy visitor load, transportation, trail use and trash that the Park experiences, we strongly urge that the Park conduct a complete visitor carrying capacity analysis - including considerations around staffing and infrastructure - that would be required to protect resources, keep the Park clean and safe and maintain a reasonable visitor load.

We are especially concerned about the cumulative environmental impacts that the opening of new bike trails and bike access to ranch roads would have on vegetation, cattle, wildlife and wildlife habitats in the Park. Of particular concern would be the permitted use of e-bikes, including emountain bikes. We encourage the EIS review to consider the environmental degradation and safety issues that Marin county parks and open spaces and MMWD have experienced with designated (and undesignated) bike trail use. Elk Management 1. We applaud management of the elk herds, however question whether the elk management techniques described will be effective. There is sure to be controversy over "agency-managed lethal removal methods", in which case, the EIS should consider how the Park Service will manage the herds if use of this tool is tied up in law suits. Can the EIS consider other viable herd management alternatives? 2. Will the EIS conduct a formal analysis of the actual carrying capacity of the herds' ranges described in the designated areas? 3. Does the EIS address how the Park Service can functionally prevent additional herds from establishing themselves? Lease length Language in Alternative B now says the Park is considering issuing "agricultural lease/permits with up to 20- year terms". We strongly urge at least a return to the language that honors the commitment to ranching that Secretary Ken Salazar made when he directed the Park Service to proceed with extending 20-year permits. This commitment to minimum of 20-year leases is reaffirmed in Congressman Huffman's bill HR 6687. Long-term leases support the viability of ranching by allowing investments in infrastructure and resource management, and provide some assurance of security for the future of ranching in the Park. Socio-economic benefits of the ranches The EIS needs to address the economic and community impacts of the proposed alternatives, including impacts on children, schools, teachers, families both on the ranches as well as on the surrounding communities. These impacts should address an analysis of economic output and multipliers, including loss of jobs. The EIS needs to also analyze the critical mass that the Seashore ranches contribute to Marin and Sonoma County ranch-related businesses. Without the critical mass of these ranches (in alternatives where ranching is reduced or eliminated), services such as feed mills, feed stores, farm supply stores and milk trucking and processing businesses won't be able to continue operating in West Marin. Rancher participation in the Conservation Framework We support and encourage strong, transparent working

relationships between the ranchers and the Park Service. Because ranchers are the land stewards with deep institutional knowledge of their resources, ranching and dairying, we believe that full rancher participation in developing the Conservation Framework and the Land Management Units is a must.

Mainstreet Moms is deeply embedded and active in the local community of West Marin. We support our Park, and also support our local ranchers and the benefits they bring to our communities. We hope that undertaking this EIS process will enable the Park Service to understand and evaluate the possible management measures that could improve the environmental sustainability of the ranches and dairies, inform elk management alternatives, improve visitor access while protecting natural and cultural resources.

#1156

Name: Baty, Tom

Correspondence: We appreciate the opportunity to comment on the Point Reyes GMP Amendment (PGMP A) formal scoping process. The National Seashore (PRNS) and North District of Golden Gate National Recreation Area (GGNRA) are truly two of America's treasures and we appreciate the 1 National Park Service (NPS) management of these nationally significant areas. The Public Lands Conservancy is dedicated to preserving, protecting, and appropriately managing public lands. This is accomplished by raising awareness in the American public about the value of public owned lands and facilitating actions to protect them. Our comments follow. 1. The preliminary draft alternatives in this scoping document do not provide enough detail to fully comment on their merits or distinctions. In the draft plan, the level of detail must be sufficient to ascertain their potential positive, negative and cumulative impacts. The terms used such as "diversification," "ranch core," "operational flexibility," and "succession" for ranching operations must be defined to understand their implications and impacts. For example, is diversification strictly limited to agricultural production or does it encompass a much broader range of economic enterprises? 2. The preliminary alternatives do not provide enough specifics on additional visitor opportunities or other natural and cultural resource activities. Because the park's legislation, NPS Organic Act, NPS Director's Orders, and NPS Management Policies are specific in their guidance about the protection of natural features, cultural resources, and visitor use, specific strategic policies and actions regarding mandated protection of park resources should be included in future alternatives, (e.g., management of historic structures, invasive species control, rare species protection, riparian fencing, and additional visitor use activities.) We also believe specifics or policy statements will help to avoid conflicts in future implementation efforts. 3. The current ranching operations do not follow the current 1980 GMP. For example, some areas are zoned natural and environmental protection reserves, but are in ranching today. We recommend that implementation of the 1980 GMP Proposed Action be considered as a future alternative. We are also concerned the 1980 joint GMP for Point Reyes and Golden Gate is 38 years old and impacts analyzed in that document are very outdated. For example, visitation has greatly increased and economic impacts have changed dramatically. 4. We are concerned about how cumulative and other impacts will be addressed in the Draft Environmental Impact Statement (DEIS). There is currently a lack of studies and data about public use, carrying capacity, wilderness character preservation, ranching operations and resource impacts currently available in order to make informed decisions about the alternatives. For example, special status species have greatly increased since the 1980 GMP and they need to be fully analyzed in the DEIS. 5. The PRNS does not have a wilderness plan as required by policy and law. However, much of the PGMP A planning area is adjacent to wilderness and will have direct, indirect, and cumulative impacts of wilderness values. We believe additional data and baseline 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 impacts impossible. - - - 6. The viability of agriculture in Marin and Sonoma County is often cited as an important issue. Please ensure updated baseline information on the economic aspects of visitor use and ranching is collected and used in the EIS impact analysis. In addition, economic impacts of overall park use by visitors and secondary effect should be discussed and quantified in the EIS. 7. Tule elk management is a critical issue. We strongly believe the continuation of a managed tule elk herd is important ecologically (restores natural process) and provides for enjoyment for park visitors. As described in the NPS Alternative B (Proposed Action), we support the retaining of the Drakes Beach and Limantour Herds. The PGMP A should fully address this issue by providing specific guidance to park staff, additional baseline information in affected environment, and a full analysis of impacts to ranching operations. We

do not believe the park has sufficient data to set a carrying capacity at this time and are unsure what data was used to set capacities expressed in the Proposed Action. 8. We recognize that the current proposed action (Alternative B) has components that have been described in the "Preserving Historic Beef and Dairy Ranching" (PHBDR) alternative that PLC proposed in last round of public comments on this matter (PLC comments 11/22/117).

"PHBDR would have dual goals of preserving the current agricultural uses in the park and assuring that natural resources and visitor experiences are being adequately protected. Park staff, with support from agency partners (examples such as RWQCB and USFW), could evaluate impacts from current beef and dairy operations with the directive to allow continued agricultural use when impacts to both natural resources and recreational uses can be reduced or mitigated. Policy could also be focused on helping ranchers improve their current operations, both visual and environmental impacts. Cultural resources (e.g., archeological sites) and highly sensitive habitats could be preserved to a higher degree. This could result in a reduction of acreage in agricultural production and/or changes in the current permitted uses (e.g., silage production). Under this alternative, tule elk would continue in the pastoral and wilderness zones and be managed appropriately. Commercial diversification would not be permitted under this alternative. "Diversification" is an undefined euphemism for what might often be an increased intensity of agricultural use. PRNS has limited resources for management and enforcement and while staff does a commendable effort to oversee existing operations, it seems naive and unrealistic to imagine that multiple additional agricultural uses could be effectively managed. Non-commercial diversification such as growing a vegetable garden or raising chickens or a few farm animals for personal consumption could be allowed on the ranches. If "operational flexibility" is defined as the common practice of switching from dairy to beef production and shifts such as dairy to heifer production, then operational flexibility could be offered in the PHBDR alternative. If diversification is considered in any of the alternatives, it should be on a net balance of all resources- -not just a simple AUM evaluation. Net agricultural considerations need to also include water usage, ground and surface water impacts, impacts to wildlife and access issues." The one clear distinction between the Proposed Action and our PHBDR alternative is the issue of diversification. In many ways commercial agricultural production is incompatible with the natural resource and recreational values of PRNS. The prospect of increasing agricultural uses through diversification warrants a realistic consideration of how standard agricultural practices are inappropriate within the boundaries of NPS policy and purpose. All action proposals in the GMP A that include a diversification component need to address the following concerns. 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 meso-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 actively being considered. Illicit depredation activities are already part of some Seashore ranching activities- -the chosen alternative in the GMP A should not add incentive to increase this behavior.

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 GMP A. Row crops and other plant-based agriculture may also require a significant new demand on water supplies. Many of the ranches are situated on small stream courses that support protected species and, depending on a ranch's water source, could adversely affect critical habitat. Before such diversification can be permitted, water supply, crop requirements, and a system to monitor use need to be evaluated and incorporated in any new agricultural uses. Finally, if "diversification" is to include any increased-intensity operations such as creameries and cheese-making facilities or farm-stays, both increased demands on water supplies and waste treatment capacities need be evaluated before new uses are approved. 9. The GMP A should clarify whether commercial "diversification" conflicts with the NPS Concession Act and what current authority would be used to enact diversification activities. 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

"necessary and appropriate for public use and 4 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. Agricultural lease housing needs to be explored under each of the alternatives. Many of the larger leases with multiple structures have significant housing units that are currently used for both agricultural worker housing and as a significant source of, hopefully, affordable rental housing. The economics of these units need to be realistically considered in the planning process. 11. To ensure smooth implementation of actions in the GMP A update, succession policies should be established for when a permittee/lease holder vacates a specific area. For example, is there a competitive process for renewal or at the discretion of the Superintendent? In turn, we believe there should be an evaluation process to ensure resource polices are implemented in areas that have inappropriate degrading impacts. 12. We recommend that a five-year performance review of permittee/lease holder be part of the proposed alternative in the DEIS to ensure NPS can review the progress of maintenance agreements and compliance with lease clauses. This review document would be publicly available as annual reviews are for concession programs. 13). The DEIS should outline costs to implement per each alternative, including costs to upgrade historic facilities at each ranch complex. The Public Lands Conservancy believes park oversight has never been properly funded by Congress. In addition, public disclosure of the process for establishment of fair market rent for ranch complex should be detailed in the GMPA DEIS. We appreciate the opportunity to comment. Thank you for your public service in maintaining and preserving our precious parks.

#1157

Name: Loeb, Beth

Correspondence: I am urging you to include in the National Seashore General Management Plan Amendment a guarantee of twenty year lease for all ranches. This would allow ranches to make investments in infrastructure and resource management and also provide security for future ranching in the park. I'm also concerned about the park in seeking to expand day use and overnight accommodations for visitors needs to have an analysis of the impact this increase on staffing and infrastructure, and what would be required to protect resources, and keep the park clean and safe. Thank you for your consideration. Thank you for allowing my comment.

#1158

Name: Hatch-Berens, Karoline

Correspondence: Hello!

I am a San Francisco resident who visits Point Reyes National Seashore frequently and I love both that it's there and that there are the historic ranches on it. I value their work and their history and nothing I say here should be an indication that I am in any way opposed to their continued usage of the agricultural areas of the park.

That said, I do think increased access for bicycles in general would be great. Specifically:

1. A new trail between Devil's Gulch and Platform Bridge through the Cheda, McIsaac, and Zanardi Ranches.
2. A plan to connect the Cross Marin Trail into Point Reyes.
3. Adoption of social trails off Bolinas Ridge for better connectivity and a single-track trail experience.
4. Extend the Olema Valley Trail to Bolinas on the east side of Highway 1.
5. Close gaps for bikes through ranch lands in the park, including closing the Estero Trail loop, connecting Sir Francis Drake Blvd. with Pierce Point Road, and connecting Marshall Beach to Pierce Point Road,
6. A more bike-friendly permit application process for road and mountain bike events in the park, including along Bolinas Ridge and out to the lighthouse.

7. Bike access to all ranch roads in the pastoral zone that are already open to pedestrians.

Thank you for your time in this matter!

#1159

Name: Brown, Preston

Correspondence: 29 November 2018

Re: Scoping Comments for EIS on GMP Amendment for Point Reyes National Seashore and GGNRA Planning Area

The Turtle Island Restoration Network submits these scoping 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).

With these comments, Turtle Island seeks to gain additional scientific information regarding the ecological implications to native ecosystems and wildlife, in ways which are affected by existing and proposed actions of the GMP. Therefore, we ask that the PRNS pursue investigations to provide additional scientific information on the ecological impacts discussed in this comment letter regarding each alternative described in the GMP EIS.

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 example, we believe that the management of Tule Elk at PRNS and GGNRA should occur in a way that promotes the health, function, and ecological role of the species on the landscape and simultaneously manage agriculture operations in ways that reduce the negative impacts to native wildlife and ecological processes. Under the existing managing regime, Tule Elk are harassed and shot, however, this is not consistent with the doctrine of native wildlife preservation. Therefore, Turtle Island Restoration Network believes that non-lethal methods should be applied to the management of Tule Elk, such as, allowing the separated herds to mix and migrate freely between PRNS and GGNRA, and relocating animals to other locations in the State where Tule elk herds exist and/or can be re-introduced. The EIS should provide scientific rationale for stating desired population levels of Tule Elk and investigate genetic consequences of leaving herds isolated from one another and preventing natural mixing of the three populations.

The National Park Service should provide scientific evidence regarding the impacts of cattle grazing on ecological processes and functions. Included in this analysis should be scientific investigations of cattle grazing on terrestrial food chains, including but not limited to: how grazing affects native grasslands and non-native grasslands, competition for forage with native wildlife, impacts of cattle grazing on terrestrial insect herbivory, interactions and effects of grazing on native predators, and effects of grazing on nutrient cycling (i.e. removing biomass from the landscape in the form of beef and milk).

Furthermore, the National Park Service should provide scientific evidence regarding the impacts of native Tule Elk grazing/browsing on terrestrial food chains, including but not limited to: how native Tule Elk herbivory impacts native grasslands and non-native grasslands, how Elk compete with native herbivores and omnivores for forage, interactions of Elk with native predators (i.e. supply documentation of predation and mortality of Elk), and effects of Elk presence on terrestrial nutrient cycling (i.e. retaining biomass on the landscape and its effects on soil nutrients, geo-chemical cycles and native wildlife species).

Turtle Island Restoration Network believes that effects of disease transmission to native terrestrial and marine wildlife from grazing cattle, dairy cattle, and domestic animals should be investigated and analyzed under the GMP EIS. Included in this analysis should be to identify scientific evidence for impacts of brucellosis transmission from beef and dairy cattle to Tule Elk and other native wildlife. Brucellosis is common among cattle and native ungulates on public lands and the presence and possible transmission of the disease at PRNS and GGNRA should

be analyzed under the GMP EIS. Additional investigations of disease occurrence and transmission to native wildlife from dairy and beef cattle including but not limited to chronic wasting disease and mad cow disease and any known potential impacts of these diseases on native wildlife if they were found in cattle. Analysis and documentation of any known disease transmission found at PRNS and GGNRA should be included in the GMP EIS. The EIS should also discuss the ranching practice of spreading waste manure from dairy ranches (likely infected with Johnne's disease) on rangelands, and discuss the risk this poses of spreading the disease to elk, other native wildlife and human visitors. Disclosure of all chemicals that could be present in the manure should be listed, including but not limited to, antibiotics, hormones, and vaccines given to livestock. Analysis of how these chemicals impact water quality, wildlife, and ecosystem health should be included in the EIS.

Diseases transmission from domestic animals to native wildlife is not limited to terrestrial ungulates. For example, thousands of Caspian seals (*Phoca caspica*) died in the Caspian Sea from April to August 2000 as a result of contracting canine distemper from domestic animals (Kennedy et. al 2001. *Emerging Infectious Diseases* v(6)(6) 637-639). Given the presence of dogs at core ranch areas at PRNS and GGNRA, investigations and analysis of the impacts of disease transmission from domestic house pets, including but not limited to canine distemper on marine wildlife, should be included in the GMP EIS.

Furthermore, domestic cats are present on Seashore ranches, and domestic cats are known to kill numerous species of mammals, reptiles, and birds. Analysis of the impacts of domestic cats on native wildlife at PRSN and GGNRA should also be investigated and analyzed under the GMP EIS.

The Park Service has stated that under the proposed alternatives included in the GMP, is the possibility of agricultural "diversification," which could include new livestock animals into the park, such as chickens, goats and sheep, or to grow agricultural crops. This would inevitably lead to conflicts between ranchers and the park's native wildlife. Therefore, the GMP EIS must identify what "diversification" would include and develop an analysis on the impacts that additional diversification would have on native wildlife, predators, food chain dynamics, nutrient cycling, and possible disease contraction between wildlife. In addition, diseases caused by animals that might be introduced as a consequence of diversification should be analyzed for impacts on native wildlife and Park visitors.

The EIS should discuss the adequacy and inadequacy of protection of natural resources under current lease operations (including ranching impacts on water quality, soils, wetlands, riparian vegetation, endangered species, and invasive plants); detail the history of compliance or lack of compliance with current and past grazing lease conditions; and discuss NPS enforcement and lack of enforcement regarding grazing lease violations.

The EIS should also include an inventory of ranch roads, a summary of the condition of the roads, and impacts of the roads to natural hydrology, water quality, ecological health, and native wildlife. Additional ranch infrastructure such as fencing, operated machinery, electric equipment, and communications technologies should be investigated and analyzed for impacts to native wildlife and ecological health and function. Ranch fencing that is not properly maintained can snare and tangle native wildlife, while also interrupting migration routes and impact predator-prey dynamics. An investigation and analysis of ranch fencing infrastructure and its impacts to native wildlife migrations, mortality, and behavior should be performed under the EIS.

Gas powered equipment and electric machinery used on ranches should be analyzed for impacts to native wildlife, such as sound and vibration disturbance on nesting birds, ground-dwelling and fossorial animals, and native predators. Ranches are electrified and contain satellite dishes, wireless internet, and phone receptor masts. Power lines that cross native vegetation can often cause fires and create other threats to public safety. Investigations and analysis of the electrified power lines for ranch infrastructure on PRNS and GGNRA should be evaluated; any documented failure, breaking, or hazard created from overhead power lines should be disclosed. Impacts to native wildlife behavior and ecological health from wireless communications has been documented elsewhere, and has been shown to be detrimental to wildlife species. For example, concentrated electro-magnetic frequencies emitted from mobile phone masts were shown to result in growth abnormalities and high mortality of tadpoles (*Rana temporaria*) (Balmori A. *Electromagnetic Biology and Medicine*. 2010. v29(1-2):31-5). Therefore, satellite

dishes, wireless internet, and cell receiver masts at ranch core sites and within the greater Planning Area of the GMP should be evaluated for potential impacts to wildlife and ecosystem functions.

Stream channels, ephemeral and intermittent waterways should be inventoried for impacts from cattle and dairy operations and analyzed for impacts to native aquatic wildlife including but not limited to salmonids, and CA red-legged frogs. Analysis of ranch infrastructure, cattle trails, and grazed ranchlands on the conditions of all water bodies should be performed under the EIS. The analysis should include: whether excessive sedimentation issues and impacts to channel form and morphology have been identified in salmonid streams from grazing and what remedies have been implemented; whether damage, loss or inhibition of growth of riparian vegetation as a result of cattle grazing has been identified in salmonid watersheds; and results of monitoring for suspended sediment, fecal coliform, channel bed conditions, water temperatures, and riparian vegetation conditions in salmonid streams has been documented,

The EIS should investigate and analyze the condition of water quality within the Planning Area and identify any impairment due to grazing and ranching activities. This includes any water quality impairment in creeks, wetlands, and water bodies from livestock grazing and dairies. Additionally, fecal coliform, nutrients, ammonia and bacteria inputs to creeks and freshwater habitats from livestock grazing and dairies, and the impacts on aquatic wildlife and ecosystems should be analyzed, along with a description of what should be done to remediate the impairment of water quality by livestock grazing on water bodies within the Planning Area.

We appreciate the opportunity to provide comment on the GMP EIS. While Turtle Island Restoration Network does not support a specific Management Alternative at this time, our intention is to 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. Furthermore, we support actions to improve the ecological health and integrity of the landscape, which includes free-roaming Tule Elk herds, without the practice of fencing, removal, hazing, sterilization, or killing of Elk. We seek information to help inform the planning process to improve cattle ranching operations in the park in a way that does not damage ecosystems or negatively impact wildlife habitat, water quality, native vegetation, public recreation or the aesthetic beauty of the park.

Sincerely,

Preston Brown Director of Watershed Conservation Turtle Island Restoration Network Salmon Protection and Watershed Network

#1160

Name: Stingle, Susan

Correspondence: Given the already heavy visitor load transportation, trail use & trash the the park experiences, I urge that the park conduct a visitor carrying capacity analysis- with considerations about staffing & infrastructure to protect resources & keep the park safe and clean.

#1161

Name: Whiteman and Kubrik, Carol and Bob

Correspondence: Dear Sup Muldoon,

We favor and support the continuation of ranching + dairy farms with the PRNS. Its consistent with the legislation that brought the park into being and with HR 6687. Please consider the following issues in the updated management plan: -the heavy visitor load and what it will take to maintain the park staffing + infrastructure. -Elk management + conduct a formal analysis of the herds' ranges and how you could actually keep additional herds from being established -lease length: consider up to 50 years! -the socioeconomic benefits the ranches provide the whole community still -keep ranchers involved in the planning and avoid us vs. them mentality. -impact of bikes in th epark. We support both the park and the ranches. Thank you.

#1162

Name: Oppenheim, Diana

Correspondence: My name is Diana Oppenheim and I have been a volunteer at Point Reyes National Seashore for the past two years. I was recently honored with the Volunteer of the Year award for 2018 for my part in working with the coastal dune restoration project.

I am here today to voice my strong opinion against and my ethical stance against the culling of the majestic Tule Elk. I would like to lay out perhaps some of the clear reasons around why this is a bad idea, and also draw some conclusions around a greater threat to our ecosystems: climate change. Because of the threat of climate change, it is a NECESSITY to increase biodiversity and build resilient ecosystems- not destroy them.

Point Reyes National Seashore is a biological hotspot in California, boasting 15% of all California biodiversity. Any and all efforts to protect wildlife needs to be the highest priority. ANY efforts to kill off the Tule Elk- - especially as the intention is to protect an industry that is linked to being the most destructive industry on the planet- - will be a threat to everyone.

The introduction of cattle into this area, and most others, have lead to an almost complete destruction of wild habitat. In fact, the restoration project I have been working on for two years is to help remedy the introduction of cattle back in the 1800s. It was at this time when cattle ranchers planted invasive grasses to stabilize the dunes to prevent sand from encroaching on "their" grazing land. This lead to an overtaking of the coastal dune ecosystem, creating a thick monoculture of European Beach Grass that choked out many native and indigenous plants and animals. There is research shown, conducted right here in Point Reyes, that the biodiversity on dairy farms is significantly less than the biodiversity of simple grazing lands and of course significantly less than protected areas.

Point Reyes National Seashore has an opportunity to increase biodiversity. Currently, almost 1/3 of the land is permitted to ranching operations. At a time when we are experiencing the effects of climate change, we need to make every effort possible to be protecting wild spaces and our biodiversity. One of the many reasons for biodiversity loss from ranching operations is the killing off of other wildlife that interferes with the grazing. The Tule Elk should absolutely not be killed or managed for the sake of ranching preference or profits. The meat and dairy industry in California is responsible for using nearly 80% of our water. This is one of the reasons we are in such a severe drought, and a reason why the wildfires keep devastating the state.

In addition to climate change and overall wildlife protection, Culling has been proven to not work. Evolutionarily speaking, if there is a rapid population decrease (due to rounding up elk and killing off some of their population) without also reducing their habitat and resources- - research shows that the remaining population tend to have more babies, and their babies mature faster leading to a very quick population rebound. It is known that culling contractors are brought in year after year to keep the population down. It's not a "one time" thing.

Other option to "manage" the elk population are also problematic and simply do not take into account that Tule Elk belong to the land. Tule Elk are endemic to California, a symbol of restoration work, and they are living creatures. At a time when there is so much threat to our natural environment, choosing to protect grazing lands and cattle over an indigenous, wild animal would be a huge step in the wrong direction.

At looking at your research, the target population for the elk is 100-160 elk. The herd in question only has a population of 112. How can you possibly think of elk management in this way when their population is barely above the minimum acceptable levels?

The population of elk at Pierce Point has stabilized on their own without human interference. There's no reason other than appeasing the ranching industry to limit the size of the elk at Drakes Bay.

I sincerely hope that Point Reyes will do the right thing for all beings and the future of the park, the community and the earth. I hope Point Reyes becomes a leader in transitioning grazing land into a rich, biodiversity ecosystem that can contribute to the fight against climate change and preserve the few beautiful places we have left.

If anything, perhaps a ranch could be turned into an animal sanctuary for the cattle that are still around. Let them live happily to an old age and die a natural death where no one makes a profit from.

#1163

Name: Goldeen, Deborah

Correspondence: RE: Tule Elk at Point Reyes.

Considering the steady increase in human population that is pushing the 6th extinction, maybe it's time to completely re-evaluate whether or not public lands should even be leased out for grazing at all. The problem is suburban development eating up ranches. Human habitation does not have to sprawl. That is a choice and it shouldn't have to come at the expense of wildlife or dairy ranchers.

#1164

Name: Jorgensen, Jeffrey

Correspondence: GGNRA is the acronym for Golden Gate National "RECREATIONAL" Area and as such must include more opportunity for one of the most popular, growing and healthy recreational activities, mountain biking. Mountain bike opportunities in Point Reyes Seashore and on GGNRA lands has been absent. It is time to review current connectivity gaps and loop opportunities for mountain biking. Additionally, from what I have been able to follow in the media, it seems that favoritism is being given to cattle ranching in this parkland than to the natural elements, plants and native animals that are why we visit these parks. It is my understanding that these ranchers were compensated (paid) for their land and given a very generous extended lease opportunity extending through their lifetime, and that was to be it. This would allow for the planning and organized phase-out of their ranching activities in the GGNRA to return it to its natural state. I further have heard that some of these ranchers used that payout to procure land just outside the GGNRA expanding their ranching operations. These ranchers received a cushy deal during their extended leases but it is now time for that to end. During my visits to Pt. Reys I have seen muddy fields completely devoid of any grasses, signs in beach areas warning not to enter the water due to contamination (from runoff from ranching operation manure leaching), as well as denied access to areas that are public and where I was once able to traverse. I was horrified to read about the situation where almost half of the Tule elk died due to lack of access to water while at the same time ranching cattle were well cared for. Let's see the reports about water quality, ranching operation and wildlife management before making an INFORMED decision what to do. While at the same time please give recreational access to bikes, both road and mountain as a healthy alternative to road traffic and parking needs within a natural area.

#1165

Name: ferrari, ellie

Correspondence: I would ask that you carefully address the possible conflict with other users of the Park system at Point Reyes if Mountain bikes are permitted.

Hill single track trails are not suitable for multi-use. Bikes move at a very fast rate going downhill and are a safety concern. There are many other trails in the park system open to this type of recreation including fire trails at Point Reyes and the Marin Headlands area.

Another consideration which should be addressed is the horse concession, Five Brooks, which takes people out riding on safe, quiet trails and this would conflict with fast-moving bikes.

We are aware that the biking networks are encouraging their members to pressure the park service to concede to their demands and hope that extra care is given to any decision made in this regard. Safety is the first priority and as the Park Service currently does not have a large quantity of rangers who can patrol this vast network, this too should be brought to bear on any decision.

Thank you for your consideration on this matter.

Ellie Ferrari

#1166

Name: LeBlanc, Jennifer

Correspondence: This comment is submitted November 27, 2018 by Jennifer LeBlanc. I live in Burlingame, and visit and hike in Pt Reyes often. I recently participated in the PRNSA California Naturalist Training program as well.

I would like to comment on the the scoping of the Environmental Impact Statement (EIS) undertaken as part of the General Management Plan (GMP) Amendment for the Point Reyes National Seashore (PORE). I hope there can be a visionary "master trail plan" for the development of a long-term, "inspirational" coordinated trail system within the planning area and PORE, linking the extensive southern trails with the currently isolated stretches of trails in the northern section of the planning area. Such a "master trail plan" will enhance connectivity which will improve visitor experiences in the planning area.

I hope that the following will be considered:

* Please consider a vision for the PORE trail system that connects the northern section and southern sections of PORE to create a unified, long-distance trail system. I understand this is a long term endeavor, but let's make it the vision/goal. A north/south trail could be either a single trail or, preferably, as a "loop" with a "low road" and a "high road" both of which primarily rely on existing trails inside and outside the planning area and - within the planning area - could use existing ranching roads and/or "social trails" (where appropriate) in the short term and be replaced with more well-considered trails in the longer-term.

* Please make it clear that open spaces are open to the public. b. The NPS has not posted signs on the fencing notifying the public that these fences (as opposed to most other fences throughout the United States) are different and are intended only to keep the cattle in, but not to keep the public out. I had no idea that this is available, and would greatly enhance the enjoyment of the area.

* Please consider adding signage, interpretative trails that also highlight the historic and cultural significance of points of interest in the Park. Our friends who live in the area of told us many wonderful things about the ranches, the cemetery, etc that we would otherwise not have known. Examples include:

a. working ranches where urban visitors see dairy and beef ranching operations and make the connection to "local" food production specifically and their food sources more generally; b. trail segments designed to reach sites showing how the Coastal Miwok re-shaped the land; c. historic site of the town of Point Reyes (on today's F Ranch) with interpretive sites showing the connection between ranching, dairy produce and meat commerce with San Francisco via shipping at Schooner Bay and access to the old piers at Schooner Landing; (F Ranch is a disturbed site due to historic uses and so should be considered as a prime location for development); d. Historic KPH Maritime Radio Receiving Station with its Art Deco-designed facility and interpretive sites explaining the importance of the receiving station history. e. the Estero Trail alongside Home Bay and on Home Ranch lands, interpreting the cultural history of indigenous people, the history of the Shafter Home Ranch (once "possibly the largest butter dairy in the world"), rum-running at this site during Prohibition, followed by Japanese-style pea and artichoke farming until the internment of Japanese farmers during WWII and the restriction of German farmers to the eastern side of Route 1 during the same time period. f. Educational opportunities for archeological excavations of Schooner Bay historic docks, enabling cooperation between the University of California archeology and other graduate field programs and/or local colleges and, possibly high schools. This could also, potentially, be undertaken as part of existing Park programs (Science at the Seashore, etc.) but this is not required.

Thank you.

#1167

Name: Phillips, Stuart

Correspondence: I support Option F. The Ranchers knew after selling their ranches for millions of dollars, their leases were temporary. The mission of the National Seashore is to restore the native plants and animals. Removing the Elk goes against this mission statement. The ranch structures are in very poor condition because the owners knew their leases had an expiration date, so they weren't improved or maintained. Maybe one ranchhouse could remain as a museum, but if the ranches remain, then it's not a National Park, and have the ranchers buy their ranch back from the American people. They received over a million dollars for each ranch in 1962-what is the present value of that now??? Well, it's \$8,217,466.67 (inflation at 3.83%/yr)

In conclusion, let's follow the mission of our National Parks, and protect the native plants and animals, not the cattlemans Assoc. and lobby.

#1168

Name: Umbarger, Mike

Correspondence: Thank you for the opportunity to comment. Mountain biking has grown much in popularity and now represents your second largest user group at around 40%. Unfortunately new mountain bike opportunities in Point Reyes Seashore and on GGNRA lands has been absent. It is time to review current connectivity gaps and loop opportunities for mountain biking. All improvements for mountain biking can also be shared with hikers and the two uses are very compatible.

Here are the access improvements I am interested in seeing developed:

A new trail between Devils Gulch and Platform Bridge through the Cheda, McIsaac, and Zanardi Ranches.

A plan to connect the Cross Marin Trail into Point Reyes.

Adoption of social trails off Bolinas Ridge for better connectivity and a single-track trail experience.

Extend the Olema Valley Trail to Bolinas on the east side of Highway 1.

Close gaps for bikes through ranch lands in the park, including closing the Estero Trail loop, connecting Sir Francis Drake Blvd. with Pierce Point Road, and connecting Marshall Beach to Pierce Point Road,

A more bike-friendly permit application process for road and mountain bike events in the park, including along Bolinas Ridge and out to the lighthouse.

Bike access to all ranch roads in the pastoral zone that are already open to pedestrians.

Again, thank you for the opportunity to comment.

Mike Umbarger

#1169

Name: ferrari, ellie

Correspondence: I am writing in support of keeping the tradition of ranching alive at Point Reyes. Much work was done many years ago to encourage the ranchers to sell their properties to the Federal Government in return for being given long leases in order to continue ranching.

The ranchers need to have their leases renewed in order to go forward and the leases should be for an extended period of time to enable them to invest the resources necessary to keep the lands healthy.

Suggestions for the government are as follow:

1. Local agricultural experts should weigh in on how to use sustainable practices that enhance the health of the land. They - and not the government who have little experience with agricultural practices - can also give guidance to the ranchers on how to make improvements on their ranch lands such as brush and weed control, number of cattle on the land, responsible water usage etc.
2. The ranchers need a longer lease in order to make improvements in keeping with new environmental practices.
3. The ranchers should be given more control over the agricultural decisions as they have been stewards of the land for many years. IT is hard to work with personnel on the NPS who have limited tenure and knowledge of their situation. Outside resources who do have experience and can help make concrete suggestions for the ranchers in going forward should be brought in. This will ensure healthy practices are enacted which will be beneficial to the ranches and the park as a whole.

Thank you for hearing our opinions.

#1170

Name: Hooper, Mary

Correspondence: November 30, 2018

I am writing as a concerned citizen and Inverness property owner regarding the Point Reyes National Seashore General Management Plan as it affects dairy ranches and tule elk.

It is noteworthy that 17 ranches and about 150 structures have just been included in the newly recognized 22,237-acre Point Reyes Peninsula Dairy Ranches Historic District. To preserve the structures without active dairy farms is like preserving a museum building without any art inside. The dairy farms should be economically viable, perhaps even subsidized. With an ever growing urban population, the opportunity for visitors to observe well managed working farms is important to a populace increasingly distant from food production.

Needless to say, the care and improvement of grazing lands is critical and should be well maintained, not denuded by overpopulation, nor polluting water sources. However, cows help keep down brush, and brush is a serious fire hazard throughout the park. Controlled burns or using mowers to do the same job would be more disruptive to wildlife. If a given ranch has more cows on the land than is appropriate, leases and fencing should be considered to reduce impacts, including possibly allowing cows alternative grazing sites - - in appropriate grazing areas that were used for grazing at an earlier time.

Livestock can also be concentrated in small paddocks for days at a time so they graze lightly but evenly and then rotated to fresh pasture. This encourages roots to grow deeper into the soil as grasses can be an important source of carbon sequestration.

As for the elk, they should be kept separate from cows because of disease transmission. This, too, can be done through fencing. And if the herds have gotten too large, some of the elk can be moved offsite, to other public lands.

#1171

Name: Sidhu, Nevilledeep

Correspondence: Im located in Northern California and travel to Marin County to ride Mountain Bikes. I would love if we had more access. It would mean i would travel to Marin more often. It will also mean alot more people travel there and that will be helpful to the local economy. There is already access to Horse riders, and hikers. Moutain bikers wont have a impact anymore that horses do.

Its in everyones benefit to allow bikes access, and i only see positives coming from this. I know alot of people who feel the same way and it would help out with the local economy from all the new visitors that it would attract.

Thanks

#1172

Name: Ballinger, Katharine

Correspondence: As a resident of West Marin County, a hiker, a naturalist, and a volunteer for Point Reyes National Seashore, I care deeply about the protection of these public lands and the natural and cultural resources within. I have an appreciation of the history of ranching in the park, but I also believe the role of ranching needs to be re-evaluated in light of current environmental assessment and stewardship approaches. As biodiversity is threatened worldwide, protecting wild lands becomes more and more important for our own health and that of ecosystems as a whole.

Ranching interests should not be given a higher priority than natural resource protection. The idea of culling native species in order to protect ranching interests is appalling to me. Especially in a National Park. Point Reyes National Seashore should be managed in the greater public interest, not in the interest of private ranchers.

I believe that phasing out ranching and habitat restoration should be the long-term goal for the park. That said, I realize that with current leases in place, it is not likely that ranching would be phased out entirely anytime soon.

With that in mind, I would like to see the environmental assessment address what impact ranching has on the wildlife that use the ranchlands. And I would like to know what stewardship standards the ranchers are held to and how are the standards implemented and enforced? The livestock industry is one of the biggest emitters of greenhouse gases on the planet. I would like to see the environmental impact assessment address this impact of ranching in the park and how it can be mitigated.

I do not support any alternative that includes culling or removing elk in order to protect ranching interests. If that management practice is adopted, how would decisions be made to decide to cull and/or remove elk from the park? I think that it is important that the public understand this process and that it be transparent.

Thank you for your consideration in this matter and for all that you do for our public lands.

#1173

Name: N/A, Noel

Correspondence: Hello, As a life long resident of Marin county (approaching 50 years) I have cherished Pt Reyes as a nature lover, surfer, father, hiker, diver, for several decades...I truly respect the diversity and beauty of the land...it is a treasure.

I am also an avid mountain bike rider and have often been heartbroken by the land use policies in Marin that restrict and limit access. Science has proven mnt bikes to be less impactful on the environment than horses and far safer (horses rate horses near top in severe spine and head injuries due to height and weight.) I love horses and there is no reason we cannot co-exist along with hikers and other users.

Almost every where in the country has found a way to successfully include access for bikes- except for Marin Country. Pt Reyes is a tremendous national resource that could relieve pressure on the more populated trails run by the county.

As a recipient of an award from the NPS for Heroic Water Rescue, allowing access to bikes will provide some risk but also provide a safety net for others while may get in to trouble - - - bikes can cover more ground quickly.

Mnt Bikers are much more active in trail maintenance than other user groups and are a great resource. Inclusion would also help align a powerful group of environmentally thoughtful and nature loving users who have often been alienated by hikers and horse people.

Now is a time for unity and inclusion to fight bigger battles together. Please allow expanded access for bikes.

Thank you.

#1174

Name: Coyle, Jeff

Correspondence: Please allow access for bicycles, especially off-road mountain biking!

#1175

Name: Bettenhausen, jennifer

Correspondence: In wildness is the preservation of the world." So said Henry David Thoreau over 160 years ago, and it is true and necessary to act on now more than ever. Congress authorized wilderness areas to be protected and preserved as naturally as possible, with no mechanized incursions. The National Park Service is entrusted with this mission. I am opposed to allowing bicycles to be used in wilderness areas in any National Park Service unit. In Marin County, including Point Reyes National Seashore, bicyclists already have access to 75% of the area trails. Day hikers, backpackers, and horse riders are looking for a quiet nature experience on the spectacular, mystical trails of Point Reyes National Seashore. This type of experience is getting harder and harder to find in our busy world and should be all the more protected from interest group pressures. Please do not cave in to pressure from the bicycle lobby. They will always want more and more and will never be satisfied. All we want is to keep the wilderness as natural as possible, with access to the natural beauty of Point Reyes' trails on foot, whether hiking boot or hoof, as it has always been and as Congress intended.

#1176

Name: RYAN, ANDREW

Correspondence: Please improve bike access to beautiful Pt. Reyes. I have a fused ankle and i can not walk or hike any significant distance. I can bike and enjoy biking in Marin, but Pt. Reyes seem very limited for mountain bikes.

#1177

Name: Stevens, Jodi

Correspondence: Point Reyes GMP Amendment EIS Superintendent Point Reyes National Seashore 1 Bear Valley Road Point Reyes Station, CA 94956

The GMPA EIS team should choose the Community Alternative as the preferred alternative. It is the only alternative that would allow all ranchers to continue their family heritage and would preserve the working landscapes the park service is charged to protect. The range of alternatives is currently inadequate and is dominated by the settlement agreement as three of the alternatives call to an end or reduction of ranching.

The park service generally has limited agricultural experience. Park service staff responsible for working with ranchers turns over regularly. No experience, no continuity and regular turn over creates many problems. Ranchers are the only land stewards with institutional knowledge of the resources and are constantly educating new PRNS staff about ranching and dairying. The Community Alternative calls for the creation of an Agricultural Advisory Committee with 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 Service, Marin Agricultural Land Trust and Marin County Farm Bureau; local agricultural expertise and individuals with long-term knowledge of the seashore ranches and dairies would be involved in decision making and decisions would not be crippled by turnover of key PRNS staff member.

In closing, the Community Alternative is the best option. This alternative will encourage good stewardship which will help preserve the working landscape for future generations.

Sincerely,

Jodi Stevens

#1178

Name: Myers, Janice

Correspondence: Wilderness areas are supposed to be free from mechanized travel. Many of the beautiful trails in Pt. Reyes National Seashore and surrounding areas already allow bicycle traffic. On some trails this is safe with hiking and equestrian traffic because the trails are wide with good lines of sight, but others are too dangerous for multi-use and would be better suited for hiking and horseback riding. Hikers and equestrians want to be able to enjoy some quiet nature trails without fearing for their safety. Many bikers are only interested in seeing how fast they can fly down the hills, without paying much attention to scenery. Also, bikes tend to damage the trails. Please do not yield to pressure from the mountain biking lobby, or soon there will be no trails for hikers and bikers to enjoy safely in the wilderness.

Sincerely, Janice Myers

#1179

Name: N/A, N/A

Correspondence: Please vote to expand trail access for Mountain Bike users in the Point Reyes National Park.

I feel that my experiences mountain biking were some of the most positive and healthy activities I engaged in throughout my youth. My respect for nature, physical activity, and other community members is due largely in part to my mountain biking background. It shaped who I am and for that I am grateful.

As a future Doctor of Physical Therapy, I have had the privilege of studying health and wellness from a bio-psycho-social perspective for the last 10 years. Giving people of all ages the opportunity to experience the outdoors is absolutely one of the most effective solutions for the health and well being of our community

members. Outdoor physical activity is the best medicine to combat anxiety, depression, obesity, diabetes and a myriad of medical conditions.

Research has demonstrated time and time again that properly built sustainable trails do not increase erosion, or negatively impact local ecosystems.

Conservationists, mountain bikers, and policy makers need to work together to prioritize environmental protection while increasing trail access to public lands to promote healthy communities for generations to come.

#1180

Name: Cunningham, Laura

Correspondence: Western Watersheds Project Laura Cunningham California Director web site:

www.westernwatersheds.org

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=91640>

November 29, 2018

RE: 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]

Dear Superintendent,

On behalf of Western Watersheds Project and its members, Conservation Congress, Wilderness Watch, and Sequoia ForestKeepers, we are submitting these scoping comments. These include information about the proposed alternatives, as well as offering additional alternatives for the National Park Service to analyze in its environmental review process as it revises its General Management Plan for Point Reyes National Seashore (PRNS) and the northern part of Golden Gate National Recreation Area (GGNRA) and flag information needs and conservation priorities for the forthcoming General management Plan. Our main concerns are the conservation of park biodiversity, the protection of remaining native plant communities such as coastal prairies, as well as consideration of further restoration of these native communities. We are also concerned with the management of native wildlife populations, including tule elk and other native species, in this popular National Park Service unit, a gem of public land in the Bay Area. Proper management and interpretation of historic cultural resources in the park, as well as sustainable recreational opportunities, are also of interest to us. Management of the Philip Burton Wilderness is another crucial aspect of our comments.

For far too long, the National Park Service (NPS) has extended livestock grazing leases on Point Reyes National Seashore, far beyond the grace period graciously and generously provided by Congress, to the detriment of native ecosystems, of individual plant and wildlife species, and of public recreation and inspiration. Livestock grazing and silage crop cultivation on Point Reyes National Seashore continues to degrade native ecosystems, spread invasive weeds, suppress the recovery of native coastal grassland communities, interfere with the natural recovery of the regions tule elk population, cause contamination of waterways and public health problems, cover the hills with livestock manure, and reduce and impair public enjoyment of these Park Service lands that were purchased with the intent of creating a National Seashore to be protected and preserved for the use and enjoyment of the people. There are 335 million Americans who are the rightful owners of Point Reyes National Seashore, and 7 million of them live in the nearby Bay Area, an area starved for available public lands for recreation. It is senseless for the National Park Service to continue to manage Point Reyes National Seashore for the benefit and private profit of 13 ranching families while neglecting the public interest to manage these lands for conservation and public enjoyment. It is time to end the extension of Park Service leases on Point Reyes for livestock grazing.

Western Watersheds Project is a non-profit organization with more than 1,500 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.

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. Background and Scoping The National Park Service (NPS) is initiating an Environmental Impact Statement (EIS) for the Point Reyes National Seashore General Management Plan Amendment (GMP Amendment). This also includes part of Golden Gate National Recreation Area (GGNRA), which also has ranch leases. The GMP Amendment will update management guidance for more than 28,000 acres of NPS land in these two park units (park), including all lands currently leased for ranching. This leased ranch and dairy land is commonly referred to as the Pastoral Zone within the park. This GMP Amendment and EIS will amend the 1980 GMP for the planning area. A Notice of Intent was released which initiated an all-too short 30-day public comment period. Despite the Department of the Interior Secretarial Order 3355 streamlining environmental reviews, we believe the NPS has the discretion to give the public more time on this very important park guidance plan. We ask for a 90-day comment period. The National Park Service says it is committed to pursuing civic engagement - a continuous, dynamic conversation with the public on many levels that reinforces the commitment of both the Park Service and the public to the preservation of heritage resources, both cultural and natural, and strengthens public understanding of the full meaning and contemporary relevance of these resources (NPS 2006a). A 30-day scoping comment period cannot possibly fulfill this commitment to gathering public opinion and enabling civic engagement. By preparing a GMP Amendment the NPS is charting and recommending a course for the management of a national park for the next 15-20 years. When a federal agency proposes to take an action, such as spending federal funds or deciding how to manage federal property, the responsible agency must follow the requirements of the National Environmental Policy Act of 1969 (NEPA) with full public participation.

Planning also provides methods and tools for resolving controversial issues in ways that minimize conflicts and promotes mutually beneficial solutions- -that articulate how public enjoyment of the parks can be part of a strategy for ensuring that resources are protected unimpaired for future generations.

For these reasons, we strongly urge the park to extend the public scoping period so that a full range of comments may be received that address the varying opinions concerning future management of these lands. The complex issues that need more time to discuss include commercial ranching should be allowed on park land, open space

value in a large metropolitan region, recreation, quality of life, water conservation, biological resource values, and visitor experiences of the historic cultural heritage of the area.

Applicable Laws During this environmental review we request the park to fully analyze every alternative under the laws which direct how Point Reyes National Seashore and Golden Gate National Recreation Area (collectively, the park) are to be managed. Specifically, NEPA, the Federal Land Policy and Management Act (FLPMA), the Organic Act, park enabling legislation, and General Management Plan statutes. After the environmental analysis has been completed for all alternatives, an environmentally preferred alternative must be identified and described. The environmentally preferred alternative is the alternative that will promote the national environmental policy as expressed in NEPA (sec. 101(b)): (1) Fulfill the responsibilities of each generation as trustee of the environment for succeeding generations. (2) Assure for all Americans safe, healthful, productive, and aesthetically and culturally pleasing surroundings. (3) Attain the widest range of beneficial uses of the environment without degradation, risk of health or safety, or other undesirable and unintended consequences. (4) Preserve important historic, cultural, and natural aspects of our national heritage and maintain, wherever possible, an environment that supports diversity and variety of individual choice. (5) Achieve a balance between population and resource use that will permit high standards of living and a wide sharing of lifes amenities. (6) Enhance the quality of renewable resources and approach the maximum attainable recycling of depletable resources. The environmentally preferred alternative should be the parks preferred alternative. In cases where the environmentally preferred alternative and the NPS preferred alternative are not the same, the planning team may receive scrutiny and questions from both other NPS offices and from the public as to why the environmentally preferred alternative is not the agencys preferred alternative. The rationale for selecting such an alternative would need to be compelling and well-documented. The National Park Service is directed under the Federal Land and Policy Management Act (FLPMA) to allow a variety of uses on its land while simultaneously trying to preserve the natural resources in them, the multiple use concept. Multiple use is defined in part as "[t]he management of the public lands and their various resource values so that they are utilized in the combination that will best meet the present and future needs of the American people; & and harmonious and coordinated management of the various resources without permanent impairment of the productivity of the land and the quality of the environment with consideration being given to the relative values of the resources and not necessarily to the combination of uses that will give the greatest economic return or the greatest unit output. Sec. 103 (c) [43 U.S.C. 1702] Commercial profit and economic return should not be the main considerations, especially within a National Park Service unit of this popularity for visitation and recreation, and especially since the NPS is charged with protection of natural resources by the 1916 Organic Act. Virtual privatization of the Pastoral Zone ranches goes against FLPMA, and this should be analyzed. The 1916 NPS Organic Act, which 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. The 1916 NPS Organic Act (and later, related laws) provides for: §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.

(b) Declarations.-

(1) 1970 declarations.-Congress declares that-

(A) the National Park System, which began with establishment of Yellowstone National Park in 1872, has since grown to include superlative natural, historic, and recreation areas in every major region of the United States and its territories and possessions; (B) these areas, though distinct in character, are united through their interrelated purposes and resources into one National Park System as cumulative expressions of a single national heritage;

(C) individually and collectively, these areas derive increased national dignity and recognition of their superb environmental quality through their inclusion jointly with each other in one System preserved and managed for the benefit and inspiration of all the people of the United States; and (D) it is the purpose of this division to include all these areas in the System and to clarify the authorities applicable to the System.

(2) 1978 reaffirmation.-Congress reaffirms, declares, and directs that the promotion and regulation of the various System units shall be consistent with and founded in the purpose established by subsection (a), 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 the System units shall be conducted in light of the high public value and integrity of the System and shall not be exercised in derogation of the values and purposes for which the System units have been established, except as directly and specifically provided by Congress. 54 U.S.C. § 100101. (Emphasis added.) The Ninth Circuit has held that the underscored 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). Equally important is that portion of the Point Reyes National Seashore enabling legislation which is similar to the Organic Act in requiring protection of natural resources as NPSs highest priority. Similarly, that portion of the GGNRA legislation which is similar to the Organic Act and seashore legislation in requiring protection of natural resources as NPSs highest priority should also be considered. NPSs detailed administrative procedures for following the unimpairment mandate in the Organic Act and the Seashore enabling legislation should be followed in the GMP revision. The Point Reyes enabling legislation which contains language regarding no impairment is 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 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, subject to the provisions of the Act entitled "An Act to establish a National Park Service, and for other purposes", approved August 25, 1916 (39 Stat. 535),¹ as amended and supplemented, and in accordance with other laws of general application relating to the national park system as defined by the Act of August 8, 1953 (67 Stat. 496),¹ except that authority otherwise available to the Secretary for the conservation and management of natural resources may be utilized to the extent he finds such authority will further the purposes of sections 459c to 459c-7 of this title. 16 U.S.C. § 459c-6. (Emphasis added.) We emphasize that Point Reyes National Seashore and Golden Gate National Recreation Area should be managed by the Secretary without impairment of its natural values. The 1978 PRNS amendment specifies the length of leases as no more than 25 years or the life of the original owner. Certain current ranchers do not qualify as an original owner, being a lessee at the time of transfer. This statute give NPS the discretion to extend the leases, subject to maintaining National Seashore resources, but does not require this. The provision in the GGNRA legislation that is similar to the Point Reyes statute and the Organic Act (which also applies to the GGNRA) regarding protection of natural resources 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. (Emphasis added.) The language in the seashore enabling statute that gives the secretary the discretionary authority to lease land for ranching is limited by the obligation to comply with this resource protection and no impairment language. We discuss this park authority to lease land for grazing further in this comment letter, under Ranches and Range Management, below. The 1978 General Management Plan statute is now outdated, and should be updated to reflect that ranch leases have run their course. Visitor use that favors wildlife viewing should be strongly considered. Updated modern native plant restoration techniques for degraded vegetation should also be incorporated into a revised plan. These areas of the updated GMP should be addressed, following NPSs detailed administrative procedures for following the GMP statute requirements: § 100501. Areas included in System The System shall include any area of land and water administered by the Secretary, acting through the Director, for park, monument, historic, parkway, recreational, or other purposes. § 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 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 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. § 100503. Five-year strategic plans (a) STRATEGIC AND PERFORMANCE PLANS.-Each System unit shall prepare and make available to the public a 5-year strategic plan and an annual performance plan. The plans shall reflect the Service policies, goals, and outcomes represented in the Service-wide strategic plan prepared pursuant to section 306 of title 5. (b) ANNUAL BUDGET.- (1) IN GENERAL.-As a part of the annual performance plan for a System unit prepared pursuant to subsection (a), following receipt of the appropriation for the unit from the Operations of the National Park System account (but not later than January 1 of each year), the superintendent of the System unit shall develop and make available to the public the budget for the current fiscal year for that System unit. (2) CONTENTS.-The budget shall include- (A) funding allocations for resource preservation (including resource management), visitor services (including maintenance, interpretation, law enforcement, and search and rescue), and administration; and (B) allocations into each of the categories in subparagraph (A) of all funds retained from fees collected for that year, including special use permits, concession franchise fees, and recreation use and entrance fees. 54 U.S.C. §§ 100501-100503. (Emphasis added.) The park should explain how continuing ranch leases that significantly impact natural resources, native plant communities, and declining species that are state and federally protected can be justified under the law. In 1978, Congress passed an amendment to the enabling legislation of Point Reyes National Seashore that livestock leases on these Park Service lands could be extended 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 his or her spouse. Beyond that point, Congress allowed, but did not require, the NPS to issue ranch leases if ranching does not impair the natural resources and wildlife at the Seashore. Most private ranchers who sold their land received a 25-year lease or a life-estate upon sale. After those expired, there was no mandate that the Park Service continue to issue leases for ranching. The statute provides the Park Service with discretion to issue such leases, which it has done since the 1990s. Ranchers who sold their land obtained time-limited authorizations to continue ranching, but those authorizations have all expired. The Park Service is not required to issue leases. The agency has the discretion to do so, but must ensure ranching complies with other statutory mandates that require protection of natural resources and wildlife. The Interior Secretary's discretionary authority for entering into leases for ranching in the seashore legislation is clear, and is based on the provision that the lessee does not impair natural resources, and provides for their protection. 459c-5. Owner's reservation of right of use and occupancy for fixed term of years or life (a) Election of term; fair market value; termination; notification; lease of Federal lands: restrictive covenants, offer to prior owner or leaseholder. 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. The owner shall elect the term to be reserved. Unless the property is wholly or partly donated to the United States, the Secretary shall pay to the owner the fair market value of the property on the date of acquisition minus the fair market value on that date of the right retained by the owner. A right retained pursuant to this section shall be subject to termination by the Secretary upon his or her determination that it is being exercised in a manner inconsistent with the purposes of sections 459c to 459c-7 of this title, and it shall terminate by operation of law upon the Secretary's notifying the holder of the right of such determination and tendering to him or her an amount equal to the fair market value of that portion of the right which remains unexpired. Where 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 459c to 459c-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 sections 459c to 459c-7 of this title. Any land to be leased by the Secretary under this section shall be offered first for such lease to the person who owned such land or was a leaseholder thereon immediately before its acquisition by the United States. 1978. 16 U.S.C. § 459c-5. (Emphasis added.) Purpose and Need

A Purpose and Need statement should be sufficiently broad to allow success at accomplishing multiple, sometimes conflicting, resource goals. We suggest a broad Purpose and Need goal of restoring, protecting, and enhancing the natural resources, and provide opportunities for enhanced, high-quality, resource-based visitor experiences. Similar goals have been included in General Management Planning for Yosemite National Park in the past, and are excellent goals for a park unit of this stature. 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 a national park when in his judgment such use is not detrimental to the primary purpose for which such park. 16 U.S. Code § 3. The natural resources in our observations show significant impacts from beef and dairy grazing operations that are detrimental to the preservation of park resources. This needs to be examined closely. Regardless of any Memorandum from an ex-Secretary of the Interior that promotes the continued presence of dairy and beef ranching operations on these NPS lands, the park should consider whether or not to authorize continued livestock grazing, and if so, at what levels, at which locations, for how long, and under what management. Any former memo from Secretary Salazar would violate NEPA in having no public environmental assessment, and would be pre-decisional. The Secretary of the Interior must also comply with laws. Past memos are a moot point since the settlement agreement now supercedes control of the process. Action is needed to comply with the terms of the Settlement Agreement which requires that the GMP Amendment and EIS be completed on or before July 14, 2021. Alternatives

Action alternatives should meet general management plan goals. What are the revised goals of park planning? Public comments received during this scoping period of public review should be given detailed consideration, and not summarily dismissed. The NPS must evaluate each alternative against specific environmental, economic, and operational criteria to identify the preferred alternative. As far as a baseline of current conditions and management practices with which to compare the alternatives to, NEPA requires that an agency succinctly describe the environment of the area(s) to be affected or created by the alternatives under consideration. 40 C.F.R. § 1502.15. Without a detailed description of the baseline environmental conditions, there is nothing with which to compare the alternatives being considered. Therefore, in order to make an informed decision in deciding whether to continue to authorize livestock grazing NPS must compare any proposed actions with current management (which provides the baseline conditions). NPS should determine which particular natural and cultural resources have the highest priority for protection and restoration, based on their sensitivity, biological value and diversity, and cultural value. Some highly valued natural resources are coastal beaches, dunes, and sand habitats; water resources such as lagoons, creeks, streams, springs, and ocean habitats; sensitive native plant communities such as coastal prairie, wet meadows, spring habitats, riparian areas, sand dune plant communities, native grasslands, vernal pools, freshwater and brackish marshes, and others. Rich soil areas should be protected, as well as sensitive wildlife habitat. Tule elk, coho salmon, California red-legged frog, tricolored blackbird, freshwater shrimp, and numerous other rare and protected species are highly valued natural resources that makes Point Reyes National Seashore and Golden Gate National Recreation Area special to the public. Clean air and stable climate should also be protected as important natural resource of the park. What are the archaeological sites, burial sites, National Historic Landmarks, and historic cultural landscapes that are highly valued by the public?

The draft EIS should discuss a reasonable range of alternatives, including those suggested by the public, to address issues and achieve goals of the plan. Alternative concepts for park management should be fully discussed and developed.

NPS Alternatives presented for scoping include: " Alternative A (No Action) - this alternative continues current management, maintaining existing ranches. Ranching would continue under 5 and 10 year permits. Resource protection buffers would be established on a case-by-case basis. Monitor resource conditions, including vegetation, water quality, and ranch infrastructure. Work with ranchers to implement best management practices to protect sensitive resources, including water quality and rare and endangered species. Work with ranchers to monitor and manage invasive non-native vegetation. Conduct residual dry matter monitoring each fall to assess levels of grazing use. Work with ranchers to adjust timing and duration of grazing as necessary to meet management goals and objectives. Issue authorizations for individual management actions and improvements by ranch operators not covered under lease/permits, such as fence construction and water developments on a case by

case basis. Consistent with current practices, management of free-range tule elk affecting park ranch lands would be limited. The NPS would continue efforts that prevent or mitigate elk damage to ranches. To date, most actions have been taken in the Drakes Beach area where the largest number of elk occur on ranches. Current actions that could be carried into the future include: fence repairs and construction of elk crossings, habitat enhancements, pasture offsets and hazing. Current monitoring of the elk herds in the pastoral zone, the Limantour area, and on Tomales Point would continue and would be modified as necessary to better understand the population dynamics of the herds. The NPS would continue to perform testing for Johnes disease and chronic wasting disease. "

Alternative B (Proposed Action) - Continued ranching and management of the Drakes Beach Tule Elk Herd
According to an email alert sent by NPS to interested parties, The proposed action would allow existing ranch families to continue beef and dairy operations with 20 year lease/permits by employing a conservation framework on ranch lands allowing for different intensities of use. Tule elk in the Drakes Beach area would be managed at a level compatible with authorized ranching. The proposed action would also identify improvements to the visitor experience, management strategies to protect park resources, and visitor carrying capacities within the planning area. Issue agricultural lease/permits with up to 20-year terms to existing ranch families to continue beef and dairy operations on approximately 27,000 acres within the planning area. Explore opportunities for ranch operational flexibility and diversification, establish approximately 900 acres of resource protection buffers, and provide a programmatic review of best management practices. Implement a conservation framework (see page 10) on ranch lands allowing for different intensities of land use depending on the land management unit (ranch core, pasture, and range). Minimize elk-related impacts to ranch operations through hazing, fence repair and modification, water development, habitat improvement, and other measures as appropriate. The Drakes Beach free-range tule elk herd would be managed at a level compatible with authorized ranching operations. Population thresholds for this herd would be a minimum of 100 animals, following guidance from the California Department of Fish and Wildlife (CDFW) Draft Elk Conservation and Management Plan (2017), and a preliminary maximum of 160 animals. The NPS would manage within that range using translocation outside of the park if practicable, or agency-managed lethal removal methods. Additionally, the NPS would evaluate management of tule elk from the Limantour free-range herd if they affect ranchlands. No additional herds would be allowed to establish in the planning area. The NPS would implement a strategy prioritizing maintenance of historic buildings on ranches in collaboration with park ranchers. Prioritization would take into account historic preservation goals and the needs of ranch operations. In some cases, adaptive reuse of historic buildings would be considered to support diversification activities within the ranch core. Strategies for the management of historic ranch complexes within the planning area but not part of ranch operations would be identified including: prioritization of specific buildings, structures, and landscapes for preservation based on their importance to the overall integrity of the historic districts and opportunities for adaptive reuse. As appropriate, the park would evaluate potential for decommissioning/deconstruction of low priority or substantially degraded structures/ complexes as part of this plan. "

Alternative C - Continued ranching and the removal of the Drakes Beach Tule Elk Herd
Under this alternative, the park would authorize existing ranch families to continue beef cattle and dairy ranching operations under agricultural lease/permits; and address the management of historic structures as described in the proposed action. The Drakes Beach tule elk herd would be removed using translocation outside of the park if practicable and agency-managed lethal removal methods. The NPS would continue to manage the Limantour herd in the Estero Road area as described in the proposed action. No new herds would be allowed to establish in the planning area. Approximately 27,000 acres of beef cattle and dairy operations would be authorized under lease/permits in the planning area. Approximately 900 acres of resource protection buffers would be established to protect sensitive resources. "

Alternative D - Reduced Ranching and management of the Drakes Beach Tule Elk Herd
A reduced ranching alternative is required by the Agreement. Under this alternative, ranching operations would cease to occur on approximately 7,500 acres in the planning area. The areas identified for closure to grazing would minimize the overall impact to the Point Reyes Peninsula Dairy Ranches Historic District and Olema Valley Dairy Ranches Historic District by maintaining operations with residential units. For areas remaining in agricultural use, the park would authorize the continuation of beef cattle and dairy ranching operations under agricultural lease/permits and address the management of historic structures as described in the proposed action. Tule elk would be managed consistent with the actions described in the proposed action but under population targets commensurate with the level of ranching operations in this alternative. In the event that additional herds form, they would be allowed. Approximately 19,500 acres of beef cattle and dairy operations would be authorized under lease/permits in the planning area. Approximately 600 acres of resource protection buffers would be established to protect sensitive resources. "

Alternative E - No Dairy Ranching and limited management of the Drakes Beach

Tule Elk Herd A no dairy ranching alternative is required by the Agreement. Under this alternative, all beef cattle ranching operations would continue. The six active dairies within Point Reyes would cease operations. Dairy operators would be eligible to convert dairy operations to beef cattle grazing over a period of 5 years. For areas remaining in beef cattle ranching, the park would authorize the operations under agricultural lease/permits and address the management of historic structures as described in the proposed action. For dairy ranches converted to beef cattle operations, adaptive reuse of historic buildings would be considered to support this change in operational activities within the ranch core. The NPS would take no action to limit elk population growth and limited action to manage the geographic extent of all free-range tule elk, but only where management is needed to support other resource protection and park goals. In the event that additional herds form, they would be allowed. Approximately 27,000 acres of beef cattle operations would be authorized under lease/permits in the planning area. Approximately 900 acres of resource protection buffers would be established to protect sensitive resources.

" Alternative F - No Ranching and expansion of Tule Elk in the Planning Area A no ranching alternative is required by the Agreement. Under this alternative, ranching in all areas of Point Reyes and the north district of Golden Gate would cease. WWP supports this alternative. It should be considered the Environmentally Preferred Alternative. With the exception of the two locations with life-estates, ranching operations with developed complexes would be phased out over a 5-year period and grazing-only operations would be phased out over a 1-year period. No agricultural activities would be permitted after the life estates expire. The NPS anticipates many of the 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. The EIS will evaluate these actions at the programmatic level. The NPS would also consider trail linkages that connect new visitor opportunities located in former ranch complexes. The exact locations of additional linkages would depend on the future uses of the ranch complexes and which ones are public-facing. The NPS would interpret the history of ranching in the park using a range of techniques, potentially including exhibits in historic structures. Prescriptive grazing may take place in priority areas to address resource management goals, such as the maintenance of native and rare plant communities. The NPS would take no action to limit elk population growth and limited action to manage the geographic extent of free-ranging tule elk, but only where management is needed to support other resource protection and park goals. The NPS would implement a strategy to minimize impacts to the Point Reyes Peninsula Dairy Ranches Historic District and the Olema Valley Dairy Ranches Historic District by prioritizing specific ranch buildings, structures, and landscapes for preservation based on their relative historic significance, and identifying opportunities for adaptive reuse. As appropriate, the park would evaluate potential for decommissioning/deconstruction of low priority or substantially degraded structures/ complexes. WWP supports Alternative F - No ranching, because of the high impacts to park resources from these commercial activities. WWP does not support commercial dairy operations in these park units because of their potentially significant impacts on water quality, native plant communities, wildlife, Threatened and Endangered species, and possibly human health.

However, we do not support prescriptive grazing in Alternative F. How would livestock grazing provide maintenance of rare plant communities?

WWP does not support converting dairy cattle to beef cattle on any ranch. Alternative E would increase beef cattle operations across Point Reyes National Seashore. This is not acceptable.

On other public lands in California- -managed by Bureau of Land Management and US Forest Service- -we have been observing the devastating impacts of beef cattle on meadows and native grasslands. Erosion, soil loss, manure pollution of water bodies, loss of native plant species, weed invasions, and potentially significant impacts to Threatened and Endangered species.

The impacts of dairy and beef cattle on the native ecosystems of Point Reyes National Seashore and Golden Gate National Recreation Area are severe. The Home Ranch, the McDonald portion, which is a beef operation according to the NPS lease/permit, has 300 Animal Unit's (3600 AUMs) of beef cattle on 2,660 acres. During site visits, this range appeared to consist of heavily grazed introduced annual weedy grassland without a shred of native coastal prairie left. There were degraded ravines with significant erosion and head cutting (see Figure 24). Springs and streams were impacted by livestock trampling and vegetation removal. This is unacceptable erosion

for any public land, let alone NPS land. Home Ranch here is in an active state of degradation, not improvement of range conditions. There is no chance of restoring native plants here with beef cattle.

PRNS has a very high number of Threatened, Endangered and sensitive species. Allowing beef operations to continue to add manure to waterways, graze down riparian areas, and eliminate native plant communities, would add to the degraded situation. We saw no streams, riparian vegetation, springs, or wetlands fenced off from beef or dairy cattle. This is far below standards for maintaining biological resources.

East Bay Regional Parks District has fenced off riparian areas from all cattle grazing in many of their parks, and often removes beef cattle completely during the summer to help rare plants and native plant communities. How many stream reaches are fenced off in PRNS/GGNRA?

And importantly, there would be no opportunity to restore coastal prairie under present commercial beef operations. Cattle grazing is incompatible with restoring delicate perennial bunchgrasses such as we saw in the far pasture edges in L Ranch- -which were too far from water and feeding stations for cattle to reach. These native bunchgrasses are "ice-cream" plants and are the first to go with cattle grazing- -beef or dairy.

We suggest an alternative to restore the "Range" proposed LMU portion of ranches (70%) to be not grazed by livestock, and be fully restored to coastal prairie and other native plant communities such as North coastal scrub, and tule elk. The lands formerly occupied by the historic Pierce Ranch have been closed to cattle grazing since the 1970s and demonstrate the success of this approach. The park could analyze an Interpretive Historic alternative that looks at a few historic cattle breed AUMs in the Pasture or Ranch Core areas of the proposed LMUs to fulfill a historic district interpretive function, but at very low stocking rates (and eliminating Johnne's disease).

Some NPS historic battlefields have interpretive cattle farm examples, but these are not for-profit. They respect the historic resource landscape and do not tax biological resources. Modern commercial beef/dairy operations are destroying native plant communities and displacing native wildlife species at PRNS/GGNRA.

Point Reyes National Seashore and GGNRA are such rare public lands, these lands are all the public has left of a potentially rewilded Bay Area/central California coast.

Other reasonable Alternatives we are proposing for analysis include:

1. No Ranching and Coastal Prairie Restoration Alternative - An important Alternative to seriously consider is a gradual restoration of the Pastoral Zone back to its native plant vegetation and habitat for native animal species, at the very least in the Range units. At present, only relict areas of native coastal prairie exist, from our observations. These relicts hang on in areas that cattle do not access, whether because these are on pasture edges too far from dairy operations, or because they are outside fenced pastures along roadsides or other small exclusions. Tule elk should be allowed to naturally return to these restoring native plant communities.
2. All relict native grassland patches should be inventoried, mapped, and fully protected from all livestock grazing and disturbance. These can be used as reference sites and seed sources for future restoration efforts. WWP staff and volunteers would be happy to aid in this mapping effort, sharing our knowledge of the locations of relict coastal prairie patches with NPS.

Using standard native plant restoration techniques, these reference sites can be used to increase plants for plantings and re-seedings using local genetic sources, to disturbed areas of the Pastoral Zone where livestock impacts have removed the native plant communities and caused soil removal and erosion.

Under no circumstances do we support using cattle, sheep or other domestic livestock grazing as a method for removing introduced annual plant cover in impacted pastures. In California annual grasslands, continuing disturbance causes declines in palatable species and increase in non-native early seral species. Livestock grazing must be removed to allow the recovery and increase of sensitive coastal prairie and wet meadow species.

After native herbaceous plant communities have begun to take a foothold in impacted livestock pastures, and are increasing and well on the way to recovery, can methods for balancing coyote bush and bush lupine be considered. Prescribed burns and tule elk grazing can maintain coastal prairie and other native plant communities in restored areas.

3. Increased Recreation Access in the Pastoral Zone Alternative - This Alternative should measure, describe, and elaborate on present visitor use of the area for birdwatching, wildlife viewing, photography, hiking, nature journaling, artistic pursuits, and other forms of quiet recreation compatible with conservation and protection of natural resources and historic artifacts. These are very popular currently, from our own observations. Wildlife camera safaris are a popular form of visitor use of the Pastoral Zone, as guides take visitors on explorations to view tule elk, bobcats, badgers, coyotes, birds, and other wildlife. What are future levels of use of these forms of recreation in the area? How can the park increase access to lands leased to ranch operations and reduce or eliminate impediments to access such as fencing, so as to allow a higher quality visitor experience of viewing wildlife in the park? 4. No Permit Transfers or Renewals Alternative - - Under this alternative no permit transfers or renewals would be allowed. This would allow existing ranchers to continue to ranch until they retire as was envisioned in the establishment act. It would also allow ranchers to sell out their permit interests to third party conservation groups and thus effectively retire those permits. Affected Environment

On our 2018 field visits to Point Reyes National Seashore and Golden Gate National Recreation Area, we made observations on the present environment in the Pastoral Zone and ranch leases on GGNRA. We recorded notes and took photographs of the condition of plant communities, including coastal prairie, North coastal scrub, wet meadow, riparian groves, freshwater and brackish (tidal) marsh, Bishop pine forest, and sand dune habitats. We also noted the condition of ponds, streams and springs.

The draft EIS should address the poor condition of grazed rangelands that we encountered throughout the Pastoral Zone. Detailed maps of vegetation types, native plants, rare natural communities, introduced annual grasslands, and noxious weed locations.

Plant community descriptions should follow California Native Plant guidelines, and Manual of California Vegetation descriptors.

Some of our 2018 field observations and comments follow.

We noted three levels of grassland and wet meadow vegetation communities during our visit to Point Reyes National Seashore: 1. Rare native Coastal Prairie and fairly common North Coastal Scrub vegetation communities that are apparently relict and never disturbed by livestock operations, representing the original natural vegetation communities of pre-Contact coastal California that were adapted to elk; 2. Vegetation communities in the Tule Elk Preserve at Tomales Point/Pierce Point and elsewhere (D Ranch elk area) that were grazed by livestock heavily but are now recovering due to decreased grazing pressure; and 3. Introduced annual grassland, invasive weeds, mowed pastures, silage fields, and impacted vegetation communities in the livestock areas and Pastoral Zone. There were some isolated native coastal prairie and north coastal scrub species also present along the roadsides of the Pastoral Zone. Another relict community that we recognized in the Pastoral Zone, was Native meadows that may have held tufted hairgrass (*Deschampsia cespitosa*).

1. Remnant Native Coastal Prairie and Coastal Scrub

The California coastal prairie community is a perennial grassland on moister, cooler coastal hills, bluffs, terraces, and valleys that are influenced by Pacific coastal climates: summer fog and heavy winter rains. Many diverse wildflowers and some shrubs also inhabit this zone. Classically, this plant community was defined as running along the coast of California from northern Los Angeles County into Oregon, although a form of coastal prairie probably occupied the prehistoric southern California coast.

Inland in Marin County, drier, inland native grasslands are found in relict patches—the valley grassland of older texts. The transition, however, is irregular, patchy, and discontinuous among species. Formerly abundant in an emerald carpet on the sea bluffs and coastal hills and valleys, only relicts of coastal prairie remain in parks and places where the bulldozers and cattle herds cannot reach.

There was a beautiful relict native coastal prairie along the dirt L Ranch Road close to the trailhead for Marshall Beach. This is apparently too distant from the dairy operation so the cows do not get this far out, and a native grassland has persisted in a relatively pristine state. This represents part of a natural community that may have been widespread across uplands of PRNS before livestock operations. We also saw two badgers (maybe the same individual), a healthy-looking coyote, and a bobcat along this road on March 18, 2018. Perhaps the steep ravines filled with north coastal scrub sloping down to Tomales Bay provide abundant cover for these predators that is not present on other heavily grazed portions of PRNS.

This ungrazed coastal prairie consisted of these native species:

" Idaho fescue (*Festuca idahoensis*)-native bunchgrass. " Red fescue (*F. rubra*)-native rhizomatous grass. " Blue wildrye (*Elymus glaucus*)-native bunchgrass. " California oatgrass (*Danthonia californica*)?-possible bunches, I need to return in summer to find seedheads to confirm. " Annual lupine (*Lupinus* sp.)-native wildflower eliminated by grazing. " Wild strawberry (*Fragaria vesca*)-native wildflower eliminated by grazing. " California buttercups (*Ranunculus californicus*)-native wildflower that can tolerate some grazing. " Sun cup (*Taraxia ovata*)-native wildflower. " Douglas iris (*Iris douglasiana*)-native perennial wildflower, tolerant to grazed pastures due to its unpalatability. " Other native forbs and grasses that were not identifiable this winter, until they flower in spring. " Coyote brush (*Baccharis pilularis*)-native north coastal scrub species. This is evidence that ungrazed prairies have a high diversity of wildflowers and do not need livestock grazing to increase native forb diversity. This site should be completely protected from grazing so it can provide a local seed source for future restoration efforts across PRNS, and be used as a reference site.

Figure 1. Relict native coastal prairie with Idaho fescue, blue wildrye, California buttercups, and coyote brush near the trailhead for Marshall Beach along L Ranch Road. Ungrazed. This area should be protected as a seed source and reference site to guide restoration.

Figure 2. Wild strawberry in bunchgrasses.

Figure 3. Sun cup in prairie remnant.

Figure 4. Douglas iris, California buttercups, and native bunchgrasses. Figure 5. Red fescue with dense cover and deep roots, mixing in with blue wildrye and other native plants. A superb example of lush, ungrazed native coastal prairie that prevents erosion.

Figure 6. Annual lupine not yet in flower, with coastal prairie bunchgrasses on road bank.

The park should analyze important coastal prairie species, and list impacts to these native species from cattle grazing. What is the potential natural vegetation in the Pastoral Zone? Some of our observations on coastal prairie grasses follow, but these observations are not exhaustive as to which species are potentially present or should be restored. Idaho fescue (*Festuca idahoensis*) is an important northern coastal prairie bunchgrass, found continuously from San Mateo County northward. It is also abundant in open forests of the North Coast Range, and on the Modoc Plateau and interior West. A coastal California form, *F. i. roemerii*, is sometimes separated from the Great Basin and interior Northwest form). Along Nimitz Way in Tilden Regional Park (Contra Costa County) the Idaho fescue bunches in an ungrazed state sometimes became large and mounded into mushroom shapes. In February the bunches were dark green in color, and walking among them was a different experience than walking through an annual grassland: the fescues were large and almost shrub-like so that we had to step over them or between them, and the intervening ground was spongy from dense Diego bentgrass. In many places California voles had made smooth runways and tunnels irregularly between the bunches. These old growth prairies should

be mapped on Point Reyes National Seashore and fully protected from all livestock grazing. Beautiful remnants of this type of coastal prairie can be seen in higher ground at Point Reyes National Seashore in Marin County, as at L Ranch on the farthest edges of dairy cattle pastures that are too far for the cows to access from the barns. Thus they are ungrazed. Large areas of the park unit may have held this species on well-drained uplands, now eliminated by heavy livestock grazing. These bunchgrasses need protection from livestock grazing, as they are tender and palatable, and so are the first to be grazed out. Red fescue (*Festuca rubra*) is a sod grass growing by short rhizomes into small patches - we have seen them tuft-like to a yard across and spreading. It is found in the summer-cool areas of the Coast Range from Monterey County northward, in coastal prairies, mountain meadows, open grassy hills, sandy coastal places, bogs, and saltmarsh edges. Relict Red fescue mixes with Idaho fescue on far pasture corners at L Ranch in Point Reyes National Seashore, where dairy cows do not graze. These areas should be preserved as reference sites for seed collection and as restoration guides, to aid in rewilding the coastal prairie to a wider area at Point Reyes National Seashore and Golden Gate National Recreation Area, once livestock are reduced or removed. We also see Red Fescue in the elk-grazed Tomales Point Tule Elk Reserve. California oatgrass (*Danthonia californica*) is not a true oat but its seeds have a slight resemblance. Found coastally these grasses grew formerly from the vicinity of Los Angeles north to British Columbia. They need adequate soil moisture, so are quite rare in the inner Coast Ranges, Central Valley, and Sierra Foothills, although they have been reported from wet meadows and seeps in these regions (Munz and Keck 1959). Jepson (1901) said they were the prevalent grass on well-drained uplands and hills along the coast. In the drier North Coast Range grasslands they formed a mesic community on swales, wet meadows, and springs in open areas with Meadow barley, Sedge (*Carex densa*), Spikerush (*Eleocharis acrostachya*), and rush (*Juncus* spp.). This prostrate pre-trampled growth form aids the oatgrasses to resist elk grazing. The culms arch outward and down, and in the extreme the culms spread flat out sideways along the ground away from hungry ungulate mouths. Each node on the culm puts out flowering spikes, and the culms fall off easily, perhaps an adaptation to allow passing hooved animals to kick them away and spread the seeds far from the plant. The bunches become smaller in basal diameter with increased grazing, around 4 to 5 inches. But sheep can chew the low nodes off with their small incisors, sometimes killing the plants if allowed to graze year-long. Cattle grazing will also eliminate these natives, as. One tule elk weighs around 500-600 pounds with a relatively narrow muzzle. A typical dairy or beef cow weighs more than twice this much, and a bull over 2,000 pounds, with wider muzzles to gobble up forage. The trampling impact of cattle therefore can be much larger than native elk and deer. California oatgrasses cannot withstand this much impact, and so have vanished from much of the California coast under domestic livestock grazing regimes. California oatgrass is cleistogamous (self-pollinating)-more seeds are contained within the sheath of the culm, and these seeds have no open pollination. Each node puts out flower spikes, and culms are easily kicked off with passing elk herds, which spreads the seeds. On Tomales Point within the tule elk fenced area, we found California oatgrass fairly common and not trampled or overgrazed. Blue wildrye (*Elymus glaucus*) was an abundant bunchgrass in western North America below 7,500 feet (Munz and Keck 1959). It occurs in conifer forests, oak woodlands, riparian groves, chaparral, and in grasslands on rich loamy soil. On the outer Coast Ranges we have seen it particularly dense on open cool north-facing slopes; it became less frequent in the interior Coast Ranges, Sierra Foothills, and southern California, often retreating to the mesic spots under oaks, and along streambanks, springs, and floodmargins. Cattle will graze the wildryes, even when dry. But anything more than light grazing will eliminate them or reduce them to the cover of brush. The plants will, however, quickly invade bare areas with fast-growing vigorous seedlings that mature in one season. It is fairly common in the tule elk-grazed Tomales Point fenced area on Point Reyes. We found the largely coastal subspecies *Elymus glaucus* ssp. *virescens* in a swale with sedges (*Carex* sp.) in dunes and coastal prairie at South Beach in Point Reyes National Seashore. This form has no awns. Do cattle impact this native grass?

On other trips we found Douglas bluegrass or Sand dune bluegrass (*Poa douglasii*). This species grows along the California coast and is endemic to the state. We found it at Point Reyes National Seashore in beach and dune areas mixing with coastal prairie in sandy places. Cattle grazing and trampling will severely degrade stands of this tufted native grass. It has short, rounded little seed-heads. How are cattle impacting this species? How are sand dune habitats protected? The rare California endemic, Pacific wildrye (*Elymus pacificus*), grows in coastal areas from Los Angeles County northward. We found it in Point Reyes National Seashore on old sand dunes with a lot of organic matter at South Beach, and in swales. How will this species be protected from cattle grazing? Diego bentgrass or Thingrass (*Agrostis diegoensis* or *pallens*) is fairly common in coastal areas in open grassland

protected from livestock, mixing with both Purple needlegrass and coastal prairie species. It is a rhizomatous native, forming small loose patches usually less than 6 to 10 feet across and leaves around 6 to 8 inches high, perfect nesting spots for deer to curl up and sleep on. The delicate lawn-patches send up only small thin seedheads. Around the outer Coast Range we find bentgrass forming loose turfs at the edge of Coast live oak groves and within their shade, in the open on slopes where fog moistened them, and forest openings in the Douglas fir-redwood belt. Along the Wildcat Peak Trail in Tilden Regional Park, we found Diego bentgrass in large patches, filling swales, and growing on slopes and ridgetops in the summer fog zone. But constant livestock grazing eliminated it quickly, and relicts can be found only in the protection of places like low shrubs and steep banks, as well as in ungrazed parks. We found a patch of this grass within the tule elk fenced area on Tomales Point, Point Reyes National Seashore, not grazed out by the elk. Other California endemic bentgrasses that are found in coastal prairie and cliffs include *Agrostis blasdalei* and *A. densiflora*. What is the status of these species at PRNS/GGNRA? NPS will need to provide detailed information about distribution and populations of rare plants in order to meet NEPAs baseline information requirements.

Another ungrazed relict native coastal prairie was seen in a fenced enclosure (for a weather station?) next to E Ranch and D Ranch. This had a different coastal prairie community:

" Pacific reedgrass (*Calamagrostis nutkaensis*)-large, coarse, deep-rooted native bunchgrass. " Dog violet (*Viola adunca*)-native wildflower. This is larval food of the Federally Endangered Myrtles silverspot (*Speyeria zerene myrtleae*), a formerly widespread SF Bay Area Nymphalid butterfly which has been reduced to only four locations in Marin and Sonoma Counties due to livestock grazing, urban development, invasive plants, and other disturbance. Why is the NPS allowing this rare habitat and its associated species to be impacted by livestock operations? " Soap plant (*Chlorogalum pomeridianum*)-native bulb wildflower, important to Native American tribes for food and other uses. " Coyote brush (*Baccharis pilularis*) " California blackberry (*Rubus ursinus*)-native vine of north coastal scrub, once a food source of California grizzlies.

Figure 7. Native ungrazed coastal prairie relict on roadside next to E Ranch along Sir Frances Drake Blvd., with Pacific reedgrass, soap plant, and coyote brush. A seed source and reference site to guide restoration.

Figure 8. Dog violet on roadside in an ungrazed reedgrass prairie area. Pacific reedgrass (*Calamagrostis nutkaensis*) is a coarse, thick-leaved, large bunchgrass that lives on the direct coast with all its fury of ocean winds, salt air, cold rain, and foggy summer moisture. This tough bunchgrass has to withstand strong salt-laden winter winds directly off the ocean, and it appears to thrive here. At Point Reyes National Seashore we found this native grass holding on as a relict on roadsides along the road that traverses E Ranch in the Pastoral Zone - an area heavily grazed with dairy cattle that we observed to cause heavy erosion and trailing, eliminating any native grasses in the fenced pastures on National Park Service lands. Within the tule elk fenced area on Tomales Point, we found large scattered bunches of Pacific reedgrass on hilltop coastal prairie, doing fine with the light elk use. We also found a relict Pacific reedgrass stand in an enclosure fenced off from all grazing (for a weather station?) around the vicinity of C and D Ranches, where the coarse bunchgrasses thrived along with the rare native western dog violet (*Viola adunca*), host species to the Myrtles silverspot butterfly (*Speyeria zerene myrtleae*). Outside the fences, the grassland was grazed heavily, eliminating these native species. and only introduced European annual grasses grew-mostly low quality Mediterranean ripgut brome (*Bromus diandrus*).

Next to D Ranch a north coastal scrub remnant was present on the ungrazed roadside, with some species that are palatable to cattle and so grazed out of other scrub sites in the Pastoral Zone:

" Cow parsnip (*Heracleum lanatum*)-native perennial. " California blackberry (*Rubus ursinus*) " Wild cucumber (*Marah fabacea*)-native vine. " Coastal bush lupine (*Lupinus arboreus*)-native shrub.

Figure 9. D Ranch area. Ungrazed roadside with relict native north coastal scrub community, harboring cowparsnip, California blackberry, wild cucumber, and coyote brush. This native plant community would probably be more common on sheltered north-facing slopes and in ravines without heavy grazing pressure. The livestock pasture on the other side of the fence shows trailing, erosion, and a heavily-grazed introduced grass field.

We found Purple needlegrass (*Stipa pulchra*) on Golden Gate National Recreation Area ranches, and these areas should be surveyed for native grass relicts as well. Native grasses here should also be conserved. NPS should survey for and analyze other native grasslands in Golden Gate National Recreation Area, where valley grassland is expected to intermingle with coastal prairie in these more inland areas.

2. Recovering Prairies in Tomales Point Tule Elk Reserve

These areas had a 100-plus-year history of livestock grazing, so still show introduced annual grasses. But more native species are present with less grazing pressure. Coastal bush lupine and coyote brush were present in a mosaic with open grassland. Old eroded headcuts were recovering in the reserve area, with vegetation growing over eroded bare dirt, and willows colonizing the ravines and seeps. No trailing or erosion were visible.

" Coyote brush (*Baccharis pilularis*) - not dominating the area, as light elk grazing may keep cover lower. The park should study this and investigate the role elk can play in lowering coyote brush cover. We noted that during the rut, bull elk will horn coyote brush and break branches. Perhaps this is a natural way prairies are kept open, in the absence of cattle grazing. " Coastal bush lupine (*Lupinus arboreus*) " Douglas iris (*Iris douglasiana*) " California buttercups (*Eschscholzia californica*) " Brodiaea (possibly *Dichelostemma capitatum*)-native bulb wildflower sending out leaves. This species is sensitive to heavy grazing. " Red maids (*Calandrinia menziesii*)-native wildflower. " Miners lettuce (*Claytonia perfoliata*)-native wildflower eliminated by grazing. Introduced annual grasses were still present from past livestock disturbance, but a few native bunchgrasses also seen.

Native species at D Ranch in the free-roaming Drakes Beach tule elk herd area and along roadside:

" Douglas iris (*Iris douglasiana*) " California poppy (*Eschscholzia californica*)-native wildflower. " Checker mallow (*Sidalcea* sp.)-native wildflower. " Soap plant (*Chlorogalum pomeridianum*)-native bulb wildflower. " White yarrow plant (*Achillea millefolium*) -native wildflower. " Creeping wildrye (*Elymus triticoides*)-a native rhizomatous meadow grass that can recover without heavy cattle grazing. Remnant by ponds at C Ranch in the tule elk area. " Common bog rush (*Juncus effusus*) Creeping wildrye (*Elymus triticoides*) is one of the most important native grasses in California, once covering much of the valley floors, floodplains, marsh edges, basins, and hill-swales in the state. It is not a bunchgrass, but rhizomatous, spreading out by vegetative runners and roots to form wide patches sometimes an acre or more in extent - thus the creeping growth form. Continuous swards were made up of many plants that covered whole valleys. It needs fairly deep soil, but is tolerant of alkaline and saline conditions. On the coastal fog belt it grows up on hill slopes and ridgetops in large round patches. Before European arrival it probably covered hundreds of thousands of acres of bottomlands all over the state in the Central Valley and Coast Range valleys, while the needlegrass-bluegrass community interfingering with it on drier flats and slopes. At Point Reyes National Seashore we found Creeping wildrye growing in low areas in back of coastal dunes as at South Beach and Kehoe Beach, in ungrazed areas with no domestic livestock. On the Tomales Point tule elk fenced area, we saw an elk trail through a beautiful, ungrazed green patch of Creeping wildrye in a ravine bottom near a marsh; we did not see these kind of native grass stands in the Pastoral Zone with dairies and cattle ranches. By the end of the dry season in October cattle will graze Creeping wildrye down heavily. It seemed to be adapted to moderate grazing by elk as the herds gathered in the summer-green moist grasslands dominated by this plant in lowlands. When the upland bunchgrasslands were dry, Creeping wildrye remained lush into September. Figure 10. Tule elk in Pierce Point reserve, showing recovering former livestock pastures with increasing native species such as Douglas iris and Miners lettuce. Coastal bush lupine and coyote brush grow with open grassland. I found Miners lettuce growing under the shrubs. The increased vegetation structure can provide more diverse bird habitat.

Figure 11. Pierce Point Elk Reserve, with recovering prairie. Coastal bush lupine, California buttercups, and Brodiaea are present in the foreground.

Figure 12. Red maids in the Tule Elk Reserve, a native wildflower.

Figure 13. Detail of coastal bush lupine. Alkaloids in this native shrub can poison cattle, and therefore it may be removed in livestock pastures by mowing.

Figure 14. Native wildflower Checker mallow along ungrazed roadside by D ranch.

3. Livestock-grazed pastures:

Introduced species dominate these cattle and sheep-grazed fields, hills, and swales. Most species are introduced European annual grasses and weedy forbs. Highly-palatable and grazing-sensitive native coastal prairie species have been eliminated. Some areas appear mowed, perhaps to reduce coastal bush lupine which is somewhat toxic to cattle. Other patches are grown with silage. Many heavily grazed areas had erosion, headcutting of ravines, multiple trails, mud blow-outs, ATV ruts, and feedlots reduced to bare ground and invasive milk thistle.

Dominant species we observed in the Pastoral Zone grasslands:

" Poison hemlock (*Conium maculatum*)-introduced weed, toxic to livestock, increasing on disturbed areas. These stands are actively being removed in restoration activities in such places as East Bay Regional Parks. " Milk thistle (*Silybum marianum*)-weed, increases with disturbance. Unpalatable to livestock, indicates severe overgrazing. " Bull thistle (*Cirsium vulgare*)-weed, increases with disturbance. " Wild radish (*Raphanus raphanistrum*)-invasive weed, planted for silage. Spreads to other areas. " Ripgut brome (*Bromus diandrus*)-abundant introduced annual grass, seen over many of the livestock pastures from C Ranch, Home Ranch, to L Ranch. Mid-quality forage grass, increases with disturbance. " Velvet grass (*Holcus lanatus*)-introduced European perennial bunchgrass often in wet meadows. " Rattail fescue (*Festuca myuros*)-introduced annual grass. " Hare barley (*Hordeum murinum* ssp. *leporinum*)-introduced weedy annual grass of disturbed places. " Italian ryegrass (*Festuca perennis*, formerly *Lolium multiflorum*)-abundant, probably seeded in many places. Introduced, with annual and perennial forms. " Common bog rush (*Juncus effusus*)-native but unpalatable and coarse, so not grazed by cattle. This may indicate wet meadow relicts where native grasses such as tufted hairgrass (*Deschampsia cespitosa*) have been grazed out. " Douglas iris (*Iris douglasiana*)-native but unpalatable to livestock so this native species persists in some places. Silage fields (actively planted, tilled, mowed, to provide extra forage for livestock):

" Wild radish (*Raphanus raphanistrum*)-Nitrogen-fixing white-flowering invasive weed. " Wild mustard (*Brassica* sp.)-Nitrogen-fixing yellow-flowering invasive weed. " Field pea (*Pisum sativum*)-Nitrogen fixing crop. " Domestic crop grasses such as barley (*Hordeum* sp.), ryegrass and/or rye (*Festuca perennis*, *Secale cereale*), and oats (*Avena* sp.). NPS should ban all plantings of silage for supplemental cattle feed, as these species are wholly inappropriate and counterproductive to maintaining native plant communities in a park unit. All mowing of native shrubs, tillage, seeding, and silage-harvesting should halt. These are not historic cultural farming practices, but modern dairy agriculture, using the latest silage seeds that are introducing genetic plant material into native communities. These areas should be restored to native coastal prairie and North coastal scrub.

The bulk of the Pastoral Zone, consisting of California introduced annual grasslands dominated by European hare barley, ripgut brome, Italian ryegrass, and rattail fescue, should be rested from cattle grazing. Only by removing livestock can these continuously disturbed areas begin to stabilize soil loss, improve water quality, increase native plant species, and recover Threatened and Endangered species.

Figure 15. D Ranch showing introduced annual grasses: Italian ryegrass, ripgut brome, and rattail fescue.

Figure 16. Dairy cattle on D Ranch in heavily-grazed introduced annual grassland of Mediterranean species.

Figure 17. L Ranch feedlot with extreme overgrazing.

Figure 18. L Ranch livestock manure pile and weeds.

Figure 19. Noxious weeds on L Ranch next to feedlot and manure piles, introduced species unpalatable to livestock or native wildlife: poison hemlock and milk thistle, with some introduced annual grasses.

Figure 20. Wild radish, an invasive weedy annual forb. This species was present in the Tule Elk Reserve as well, as its seeds travel far from sources.

Figure 21. Silage fields and mowed pastures, view from L Ranch Road. The yellow color is from mustard plants flowering. This is a heavily modified modern industrial agricultural landscape that does not fit the description of historic objects. 4. Native Meadow communities. Low swales that contained native rushes (*Juncus* spp.) appeared in many places, as at L Ranch. These may have held native perennial meadow grasses that have been extirpated by heavy livestock grazing. This needs assessment. Tufted hairgrass (*Deschampsia cespitosa*) is a large northern coastal prairie bunchgrass of moist or marshy soils, or in ecotones with drier soils. Some forms are salt-tolerant. The subspecies *Deschampsia cespitosa* ssp. *cespitosa* is widespread along the coast and in mountain meadows of the Sierra Nevada and Coast Range, as well as the Great Basin. The subspecies *D. c. holciformis* is the common coastal form. It was reported by Jepson (1901) in wet meadows and stream borders on the Oakland Hills and in San Francisco. Watson (1880) went further to say this large robust bunchgrass furnished good yields of hay in moist meadows of Oakland and San Francisco - this must be a lost habitat, dug up and covered with concrete and asphalt now. Coastal Marin County may have had large acreages of this native meadow community, as at PRNS before fenced heavy cattle grazing. At Point Reyes National Seashore, we found large bunches of *D. c. holciformis* dominating the relict coastal prairies behind dunes, in both dry areas and moist puddles. It is also common in Sierran meadows. This form is not salt tolerant, and is found on coastal prairie knolls behind the salt marshes at Point Reyes, mixing with Blue wildrye, Pacific reedgrass, and Red fescue. The salt-tolerant form *D. c. ssp. beringensis* grows in salt marshes on Point Reyes with saltgrass (*Distichlis spicata*) and pickleweed (*Salicornia* sp.). It is a rarer coastal form in California. What are the status of all subspecies of tufted hairgrass at PRNS and GGNRA? What are the impacts of cattle grazing? Potential natural areas that would have supported these native plant communities should be mapped. Cattle grazing quickly eliminates tufted hairgrass, leaving little trace of these moist meadow habitats. Only hints may remain under grazing pressure: inedible rushes (*Juncus* spp.) and native wild iris (*Iris douglasiana*) that can be seen in the Point Reyes Pastoral Zone, signs of former more diverse meadow habitats that are now degraded. We found tufted hairgrass within the elk fenced area, however, at Tomales Point.

Figure 22. L Ranch wet meadow/wetland prairie remnant of unpalatable bog rush. Native meadow grasses such as tufted hairgrass (*Deschampsia cespitosa*) that would have grown with the dark-green bog rushes have been eliminated by livestock grazing and replaced with introduced European grasses clipped short by hungry cattle. Poison hemlock in the foreground along the fence.

Figure 23. What a western US native wet meadow can look like without heavy grazing pressure: Tufted hairgrass (*Deschampsia cespitosa*) wet meadow, summer 2017, Monitor Range, Nevada. This area is home to a Rocky Mountain elk herd.

Conservation Framework The park proposes a Conservation Framework that would form a zoning framework of ranch core, pasture and range that would be applied to all action alternatives that include ranching. This framework, described as Land Management Units (LMUs) by the park, is based on resource sensitivity and would guide both park staff and ranchers when considering various ranch-related activities. The park proposes to define these LMUs on the basis of Threatened and Endangered species, rare plants, native grasslands, forests, ponds, streams, wetlands, slope, and archaeological resources. The LMUs are defined below: " Range (nearly 70% of planning area) - Grazed or potentially grazed land that supports native vegetation, managed as a natural ecosystem. Includes documented sensitive resource areas, including rare plants, wetlands, riparian/stream/pond habitats, forested areas, critical habitat for threatened and endangered species, and archeological sites. Includes nearly all areas with slopes greater than 20%. Authorized activities would be limited to regular grazing; generally, no pasture management or diversification activities.

" Pasture (nearly 30% of planning area) - Grazed lands outside of Range LMU used primarily for the production of livestock, comprised of introduced or domesticated native forage species. A suite of pasture management activities, including seeding, mowing, and nutrient management would be evaluated for compatibility with resource goals. Manure management on dairies would be authorized. Activities would be subject to conservation practice standards, operational constraints, and maintenance requirements as necessary. Pasture LMU may be refined further under individual ranch plans. Under some alternatives, certain livestock diversification activities and silage could occur in the pasture LMU.

" Ranch Core (approximately 1% of planning area) - The developed complex of buildings and structures on each individual ranch. Under some alternatives, up to 2.5 additional acres of disturbed land immediately adjacent to the developed complex would be available for diversification activities such as row crops and other livestock. Ranches without a developed complex or rancher occupied buildings would not include a Ranch Core area. Geographic or resource protection constraints could limit ranch core options on individual ranches. We commend NPS for proposing a somewhat greater level of management for sensitive natural resources. Although the details of management of these units proposed in the General Management Plan should be examined in the EIS, and not deferred until a later date. Up to 2.5 acres of additional park land allowed to be developed in diversification activities in the future does not detail what these could be: what kinds of agricultural crops are proposed, or additional livestock or poultry for each ranch? What other commercial activities, new buildings, cabins, or visitor services are proposed on park land? These need to be reviewed in detail in the draft EIS. What crops will be grown? Will vineyards be allowed on NPS land? Will AirB&Bs be allowed with commercial concessioner permit? Ranches and Range Management Private ranches were bought out more than four decades ago, at fair market value and enormous taxpayer expense, following the establishment of Point Reyes National Seashore and Golden Gate National Recreation Area. According to the park, NPS purchased the land from ranch owners who in many cases continued to ranch under time-limited reservations of use and occupancy. As the reservations expired, the NPS continued to authorize ranching and dairying with agricultural lease/special use permits (lease/permits). Currently, 24 ranching operations are authorized for beef and dairy ranching under lease/permits which include terms and conditions for the protection of natural and cultural resources (emphasis ours). Of those 24 lease/permits or reservations of use and occupancy, 18 ranches include residential use. In cases where grazing lessees abandon their leases for any reason, the GMP must specify that the Park Service must permanently close these lands to future livestock use. It is odious and unacceptable that in many cases, as former ranch owners have turned over their former lands to the Park Service and moved their operations elsewhere (or ceased operations through retirement), that NPS has allowed remaining ranch operations to expand into areas previously held by other ranchers. When a ranch ceases operation inside PRNS or GGNRA, those lands should be allowed to return to a natural state, replete with native species (including tule elk). Agricultural lease/permits continue beef and dairy ranch operations on approximately 18,000 acres of Point Reyes National Seashore and 10,000 acres of GGNRA. The park should explain in detail how it determines that leases are meeting the mandates of resource protection presently. Why does the park service use measures of Residual Dry Matter (RDM) instead of Ecological Site Descriptions? Residual Dry Matter shows no indicators of poor range quality such as the shift to less palatable grass and forb species, nor does it identify native species that survive and could increase with management that restores coastal prairie. RDM is the plant material remaining in a field at the end of the season, but we have serious concerns on the accuracy of this metric. Beef cow weights used in determining AUMs may be outdated. Beef cattle are on average heavier now than in the 1980s when management was structured. In the 1980 GMP, what are the cow weights used in stocking rates? Beef weights are now 1400 to 1600 lbs, heavier than in earlier calculations. This needs analysis. Some ranches may actually need half the stocking rate to meet suitability standards and carrying capacity. Certain ranches should have no cattle based on these outdated calculations. How are slope, steepness, and wetlands taken into account when range suitability is determined? What, if any, wildlife forage allocations are made? How many RDM measures are done in pastures that are in a grazing rotation, so that too much forage is measured across the ranch units? This could skew stocking rates and carrying capacity and cause overgrazing. How much hay do ranchers buy to make up for any potentially miscalculated stocking rates? The draft EIS should evaluate a consistent framework for classifying and describing rangeland and forestland soils and vegetation; thereby delineating land units that share similar capabilities to respond to management activities or disturbance. If these are not used, what does the park use to provide land managers the information needed for evaluating the land as to suitability for various land-uses, capability to respond to different management activities

or disturbance processes, and ability to sustain productivity over the long term? What indicators of poor range health does the park use to ask lessees to move livestock out of the park if range conditions do not support the numbers of cattle? In discussing range management with staff at Black Diamond Mines Regional Park, in Contra Costa County (managed by the East Bay Regional Park District) this summer, large differences in management were noted. This area is drier and more inland than Point Reyes, but has a similar range dominated by California annual grassland. We observed many more native perennial grasses here, however, as well as rare plants. The regional park here completely takes cattle off the park in summer as the grasses dry out. The grasslands are not grazed by livestock for approximately 5 months during the dry season. Yet NPS at PRNS/GGNRA allows ranches to keep livestock on the ranges year-round, which in our view is degrading conditions and leading to the need for feed supplementation. Figure 24. Beef cattle on Home Ranch, March, 2018, in eroded range where all deep-rooted native coastal prairie bunchgrasses have been grazed out. This introduced annual grassland is shallow-rooted and not holding soil stability. The deep and active headcut in this gully is growing. This range is degrading. What indicators are used presently, or should be considered in the future, to measure resource conditions? What are the management actions being used to maintain or restore desired conditions? The EIS should describe in detail the number of AUMs and classes of livestock presently on these ranch leases, and describe the carrying capacity of the ranges. Currently, about 6,000 cattle are grazing year-round in Point Reyes National Seashore and GGNRA. We believe this is far over the carrying capacity of this former coastal prairie, that is now converted to California annual grassland range. Hay needs to be trucked in for late summer feed, such as at L Ranch, after the Mediterranean climate summer has dried out the annual grasses and forage for livestock is at a minimum until the rainy season starts again, typically in October. One of the Management Objectives of the 1980 General Management Plan (GMP) is to manage seashore activities in the pastoral and estuarine areas in a manner compatible with resource carrying capacity. GMP at 2. This requirement needs to be retained if livestock grazing is permitted to continue. Clearly not all lands within the pastoral zone are suitable for livestock grazing. For example, exclosures have had to be installed to protect some natural and cultural resources from the direct effects of livestock. Additionally, many areas within the Pastoral Zone are not actually capable of supporting livestock at all on a sustained basis. Weedy areas, bare slopes, gullies and soil erosion are evident throughout the zone, demonstrating that current levels of livestock stocking are incompatible with maintaining healthy rangelands. The park must determine the current carrying capacity and suitability of the lands in the Pastoral Zone for grazing by livestock, consider how these factors have changed since the 1980 GMP was produced, and analyze how these factors are expected to change over the next 20 years. Without this fundamental baseline data, the park will not be able to determine if it can meet the GMP objective with continued livestock grazing and thus will not be in a legal position to authorize any continued livestock grazing. Development of a comprehensive management plan for livestock grazing would thus be unnecessary. This should be included in the draft EIS, and not pushed to a later date. Without incorporating livestock management standards in the GMP - and evaluating a range of reasonable alternatives - the Park Service will be unable to evaluate the impacts of livestock on native plants and wildlife. In our observation, the vast majority of the Pastoral Zone has been type-converted from native perennial coastal prairie and wet meadow into California annual grassland-consisting largely of introduced European species. California annual grasslands experience a long summer dry season, even in the coastal fog belt, where maintaining cattle can be difficult unless supplementation is given, or cattle are moved to irrigated pastures. In addition, forage quality declines below the nutritional needs of many kinds and classes of livestock during the summer dry season. The question presents itself, should feed supplementation on this scale be allowed in a national park unit? The EIS should describe all types and amounts of hay trucked into the park, as well as schedules and dates. How many tons of hay is needed to supplement dairies on the Seashore? What type of hay is it, and from what growers are these large bales obtained? Is it certified weed-free? If the hay is alfalfa, this should be analyzed as a weedy non-native species that may contain seeds that could escape into nearby adjacent plant communities. Figure 25. Hay that appears to be alfalfa stacked at a feedlot along L Ranch road inside Point Reyes National Seashore, to feed dairy cattle at the end of the dry summer. September 2018. The new GMP should eliminate silage production on PRNS and GGNRA. Current silage fields should also be described in detail, as to locations with maps, acreages, and amounts of forage produced for cattle. We observed several species in March, 2018, in silage fields in the Pastoral Zone, including wild radish (*Raphanus raphanistrum*), wild mustard (*Brassica* sp.), field pea (*Pisum sativum*), and domestic crop grasses such as barley (*Hordeum* sp.), ryegrass and/or rye (*Festuca perennis*, *Secale cereale*), and oats (*Avena* sp.). The draft EIS should list each silage species seeded into these fields, and analyze the impacts of these non-native plants on native plant communities. Wild radish and wild mustard are invasive European species, and we found examples elsewhere outside of the Pastoral Zone. How many acres of grassland

are mowed to remove native coyote brush and bush lupine? These should be mapped and acreages given. What are the impacts to native birds that nest in and forage in North coastal scrub habitats, and impacts to other native plant and animal species? As part of describing current and desired conditions in the Pastoral Zone, the park should clearly define these conditions for all lands including riparian and upland areas. The draft EIS should include maps showing soils, vegetation communities, wildlife habitats, all springs and riparian areas, and livestock use areas. The park should map and tabulate all existing range-developments including fences, corrals and water developments. Many of the barbed-wire fences are in bad condition, broken, and few if any are wildlife-friendly with smooth wires. The EIS should summarize prior and proposed monitoring efforts in the Pastoral Zone. The NEPA documents should explicitly explain the entire suite of implementation and effectiveness monitoring activities that will be used by the park for this project and provide specific schedules for these monitoring actions. Reliance on utilization monitoring is inadequate to determine direct impacts to the coastal prairie, plant and animal species, cultural resources, soils, riparian systems, water quality, and other resources present in the project area. NPS on its Point Reyes National Seashore website, describes its ranching and dairying lease/permits that it administers: While many of these lease/permits have expired, the NPS has issued letters of authorization to continue operations under the existing terms and conditions of these permits. The NPS will continue to issue letters of authorization pending completion of the Ranch Comprehensive Management Plan and issuance of new lease/permits. The EIS and General Management Plan amendment should clarify what these letters of authorization are, and whether they are legal under present laws. As a popular national park unit, the public deserves to know how these expired commercial grazing leases are able to continue on public land with questionable public benefit.

Reviewing the Agricultural Lease/Permits on PRNS/GGNRA, we notice how many are quite old and potentially out-of-date with concern to range conditions, biological resources, climate change, and threatened and endangered species trends. For example, the permit/lease for the historic L Ranch is dated at 2009 on the PRNS website. Is there a more current lease/permit?

The NPS website for Point Reyes National Seashore says that, the Range team completed annual Residual Dry Matter (RDM) monitoring in mid-October [2016]. What are the results of RDM monitoring for 2017 and 2018? How does NPS know what range trends are occurring presently? Before any approval of a GMP amendment or NEPA alternative is considered, NPS should monitor and make publicly available all RDM measurements for ranches in the current years and 5 years into the future. Is this land under a commercial concessioner agreement and management plan? The proposal that pasture LMU may be refined further under individual ranch plans, is a deferred action that needs to be reviewed with public scrutiny in the draft EIS, not later after the GMP amendment is approved. Please define domesticated native forage species. What species are these? We disagree that 70% of the planning area, the proposed Range LMU, supports much native herbaceous vegetation. The NPS must, in the interests of taking the legally-required hard look, field-inventory lands that are currently grazed by livestock and present data on species composition (Daubenmire plots and line transects provide widely-accepted methods of rigorous baseline data collection). In our observations, a large percentage of the Pastoral Zone consists of introduced annual grassland, with species of European grasses and forbs. Native coastal prairie species are rare and relictual in ungrazed pasture edges or roadsides. With present levels of livestock grazing, this LMU will not be able to achieve a restored coastal prairie as long as this disturbance persists. Native vegetation will not be supported unless an active restoration program is enacted, which greatly reduces or eliminates all livestock grazing. What type of grazing system is used by the ranches? Continuous grazing and seasonal-suitability grazing are often used on private annual rangelands in the Coast Ranges, but desirable plants- -particularly native perennial Coastal Prairie grasses- -will be grazed excessively under continuous grazing. With continuous grazing, stocking rate must be very light during the growing season because adequate forage must be left to carry animals through the dormant season. What are the stocking rates the park allows on these ranches? In order to increase biodiversity and restore native plant communities on the Range LMU, stocking rates should be greatly decreased or eliminated entirely to zero livestock. NPS should also consider removing all stock in the summer dry season. Continuous grazing with high stocking rates is currently degrading the Pastoral Zone, with indicators of bare ground, erosion, trailing, bank chiseling, and noxious weed invasions (milk thistle and poison hemlock, for example). Point Reyes National Seashore may simply be an incompatible place for commercial industrial dairying and beef production at this scale.

Similarly, GGNRA annual grasslands should be examined for lower stocking rates, or removal of livestock, that increase native perennial grasses, forb diversity, and native plant communities. Cattle cause increased erosion and siltation in local trout and salmon spawning streams, threatening the survival of imperiled runs of coho salmon and steelhead. Sowing, mowing, fertilization, and manure spreading are still allowed under this framework in every ranch alternative. These are not acceptable practices in the national park units. The high density of livestock, barbed-wire fences, and manure-spreading at Point Reyes is incompatible with the National Seashores legal charge to provide public benefit, recreation and inspiration. The interests of 335 million Americans, and 7 million Bay Area residents, should take precedence over the interests of 13 ranching families who have overstayed their lease terms. Cultivation of silage crops on Point Reyes to feed cattle in Concentrated Animal Feeding Operations (CAFOs) destroys native habitats, and when silage is mown in Spring, kills ground-nesting birds and native rodents. This subsidizes unnaturally large raven populations, which in turn prey on the nests of the endangered snowy plover in their beachside nesting habitats. Heavy grazing by beef and dairy cattle is destroying the native coastal prairie, replacing native grasses with noxious weeds, and compacts soils. Livestock contaminate streams and rivers with manure, resulting in some of the worst Clean Water Act violations in California for fecal bacteria, in streams that empty out onto popular public beaches. Total effluent discharges associated with dairy operations into creeks, ponds, and beaches should be analyzed. On its website, Point Reyes National Seashore gives a 2016 update, the Range Program has also been looking at recent aerial photography with our geographic information systems intern to quantify shrub cover on PRNS rangelands. What are the results of this survey and what surveys have been carried out in 2017 and 2018? The EIS should justify why removing native shrub cover is beneficial to native wildlife. Many species depend on North coastal scrub and native shrubs for nesting, cover, and foraging. The EIS should also analyze how tule elk grazing and rutting activity (such as elk bulls horning shrubs with antlers) can decrease coyote brush and bush lupine cover. A program of prescribed burning and elk grazing should be analyzed in the Pastoral Zone as an alternative to cattle grazing, to keep a balance of open native grassland and native shrubland plant communities.

Ranch lease/permits on the PRNS website show older dates in some cases: L Ranchs permit/lease is dated 2009, with some hand-written notes updating the permit/lease of 2011. Are there any updated permit/leases the public can view? The lease/permit for L Ranch states that this is to be a 5- year permit. Section 1.10 and Section 5.1. The L Ranch lease/permit was supposed to end in 2014, yet the dairy is still running livestock. Has NPS issued a new permit/lease, and is it available for public view? Point Reyes National Seashore Agricultural Lease/Permit Historic L Ranch. Section 5.2. June 1, 2009, says: If a subsequent lease is not entered into prior to the Expiration Date, the provisions of this Lease regarding Lessees obligations to surrender and vacate the Premises shall apply. NPS should provide a complete history of lease/permits for each ranch, and dates when such leases were renewed. Copies of all lease/permits and dates of renewals should be included in an EIS appendix. The lease/permits mention lessees desire to lease certain historic agricultural lands. How does NPS define historic agricultural lands, and how are modern new facilities such as dairy barns and modern water facilities managed to maintain historic standards?

Will ranching alternatives allow special events on leased land? Will special use permits be required?

Have lessees developed, along with NPS, a Ranch Unit Plan which includes Best Management Practices for each ranch? Please provide these in the EIS. Are these issued annually as resource conditions change?

Does lease rents go into the U.S. Treasury, into a National Park Service general fund, or specifically back to PRNS/GGNRA to help mitigate impacts of livestock grazing to these park lands?

Lease/permits, such as for L Ranch, state that lessees will monitor Residual Dry Matter (RDM) in the fall prior to winter range, in Key Areas. Are any outside, independent range managers available to measure RDM? Does the park publish RDM measures for public review? The EIS should detail how many times overgrazing (as mentioned in L Ranch Lease/Permit Section 8) has occurred, and how the park has corrected or mitigated overgrazing. A detailed history of ranch management with respect to AUMs and stocking rate adjustments should be made. Definitions of Key Area should be included, and why these are chosen.

The park should analyze why it does not use other more modern measure of range quality, such as Ecological Site Descriptions. We are curious why the National Park Service does not use this interagency guideline for science-based range management, when it is used by the Department of Interior (Bureau of Land Management), US Department of Agriculture (US Forest Service), and National Resources Conservation Service. But not the National Park Service, which is supposed to have a high standard of resource protection in the eyes of the public?

The Park Services 2006 Management Policies declare that the agency will phase out the commercial grazing of livestock whenever possible. 2006 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.

Have lessees allowed cattle owned by other entities to graze on their ranch units? How does NPS monitor cattle ownership? Are brands recorded?

If ranching is allowed to continue, lease rates should immediately be adjusted to fair-market value. The average private land grazing lease in western public land states is \$22.60 (Congressional Research Service 2016 at 7). This should be the minimum charged at PRNS and GGNRA, and perhaps more in recognition of Californias higher land values.

Tule Elk Tule elk are a California endemic subspecies, and a natural and historical heritage of coastal California. The elk preserve population is fenced into a narrow peninsula that lacks adequate water during drought, confinement that possibly killed hundreds of elk between 2012 and 2014. The fence must come down, and elk, not livestock, should be allowed to thrive throughout Point Reyes National Seashore. The ongoing restoration of the Point Reyes National Seashore tule elk population is a jewel in the crown of NPS success stories. The National Park Services mission is to 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. Code § 1. The National Park Services mission is not to promote the commercial/business interests of a handful of private entities at the expense of treasured public resources. The NPS has as part of its statutory requirements and past management commitments the obligation to return tule elk to all parts of PRNS, and we support expediting this process. According to NPS (1998: 4), Elk are an attraction for many who visit the area, and abundant experience from visitor comments and public meetings shows that the elk are a highly visible attraction that draws visitors to Tomales Point. In 1976, Congress declared that the protection and maintenance of Californias tule elk in a free and wild state is of educational, scientific, and esthetic value to the people of the United States and thus the restoration and conservation of a tule elk population in California of at least two thousand . . . is an appropriate national goal. 16 U.S.C. § 673(d); Pub. L. No. 94-389, 90 Stat. 1189 (1976). Congress required the NPS to develop a plan for tule elk. The agencys Tule Elk Management Plan (NPS 1998: 40) included a goal of attaining a free-ranging tule elk herd by 2005, stating: Their limitation to Tomales Point is an historical artifact of their reintroduction onto an area bounded by historic ranches and the intent to restrict their movements to a protected preserve. If they are to remain as part of the Seashore's fauna and ecological processes, they should eventually become free-ranging throughout most of the Seashore's natural zones where conditions allow. This provision of the Tule Elk Management Plan is being hindered by the small but highly vocal livestock industry that continues to lease public lands on PRNS/GGNRA. McCullough (1969) estimated that in 1850 approximately 500,000 tule elk roamed California. In the 1850s and 1860s, heavy market hunting-much of this due to the influx of gold miners to California-lead to the extirpation of elk at Point Reyes. By the late 1870s, only 10 individuals remained in Kern County, and this bottlenecked population became the seed source for all tule elk present in California today. According to McCullough et al. (1993: 25) tule elk are genetically quite similar and the entire population is inbred. According to NPS (1998: 39), the population of tule elk at Point Reyes National Seashore has been estimated to contain the lowest level of genetic variation (or heterozygosity) of all the herds in the state, based upon an analysis of translocations and bottlenecks (McCullough et al. 1996). This heterozygosity would be enhanced by removing the fence at Tomales Point and thereby allowing all tule elk on Point Reyes National Seashore to mix and interbreed. Cattle (both dairy and beef) are non-native species that compete for forage with elk, to the detriment of elk growth and reproduction. According to McCullough et al. (1993: 6), early growth of the Tomales Point Herd was slow due to over-utilization of the range by domestic cattle.

This situation remains in the Pastoral Zone, where cattle grazing continues to interfere with the expansion and recovery of tule elk. Absent for over 150 years, elk were reintroduced at Point Reyes in 1978 with the transfer of 10 individuals from San Luis National Wildlife Refuge to Tomales Point. The erection of a three-mile-long fence across the peninsula from the Pacific Ocean to Tomales Bay isolated the herd from adjacent dairy ranches. This created a 2,600-acre enclosure that constitutes the current elk range in the Seashore. The NPS, in the forthcoming EIS, must disclose any scientific basis for fencing a free-ranging elk population, and for maintaining an isolated elk population on such a small, constricted, and limited spatial area. NPS must present information on the availability (or lack thereof) of fresh surface water within the Tomales Point enclosure during times of drought, and also present information on the likelihood of more extended and/or deeper droughts on PRNS in the future as a result of the changing climate. This appears to be an unnatural and harmful practice that should be ended through the removal of the Tomales Point fence. Livestock competes with native wildlife for habitat and forage, and indeed the best tule elk habitat on Point Reyes National Seashore shows a strong overlap with lands currently leased for agricultural purposes. According to Cobb (2010:70), elk were observed avoiding pastures when cattle were present and cattle were seen chasing elk from pastures on multiple occasions. These observations were supported by concurrent GPS collar data that showed Pt. Reyes tule elk almost entirely avoided pastures occupied by cattle (unpublished data). NPS must evaluate and disclose the negative impacts of livestock themselves, and of livestock fencing, on tule elk under each alternative. NPS needs to estimate the total carrying capacity of PRNS/GGNRA for tule elk in the absence of competition with non-native livestock, as a baseline for estimating the current negative impacts of livestock grazing leasing and operations on tule elk. WWP supports the elimination of livestock grazing through non-renewal as leases and reservations expire, the removal of all fences erected by the livestock industry or for the purpose of restricting the access of elk to the full extent of Point Reyes National Seashore, and the future management of elk through natural increase and population limitation in the absence of culling or contraception of any kind. The forthcoming EIS should fully investigate and disclose the extent to which fences have impaired the movements and health of tule elk, and require that any fences that remain for administrative purposes be built to maximize wildlife safety and passage. Tule elk roamed at will throughout Point Reyes prior to the arrival of human management, and native ecosystems were much healthier than they are today with the questionable benefit of park interference. Gogan (1986) projected that the carrying capacity of elk in this small, enclosed Tomales Point area is 140 animals. However, McCullough et al. (1993: 7) asserted that the carrying capacity derived by Gogan (140) was artificially low due to the prior impact of excessive cattle grazing, and postulated a carrying capacity of 346 animals. We are concerned that this number is below the Minimum Viable Population (MVP) size from genetic and ecological standpoints. MVP from a genetic standpoint is an effective population size (N_e) of 50 breeding animals, subtracting subadults (as they are not genetically contributing to the breeding population) and then correcting for skewed sex ratios of breeding animals such that there is a 1:1 ratio between breeding males and breeding females. As part of its baseline information in the forthcoming EIS, NPS must calculate and present the effective population size for a minimum viable population of tule elk on Point Reyes, both from a genetic perspective and from an ecological perspective. In the case of tule elk, one bull does virtually all the breeding with all of the cows in a given harem, leading to a highly-skewed sex ratio of breeding animals. Tule elk are harem breeders, with a single dominant bull copulating with most if not all of the females in his harem during the breeding season. The harem masters genetic contribution to the next generation far outweighs the genetic contribution of each individual cow. Using this example, if we have a breeding population of 100 tule elk (excluding subadults and non-breeders) with 96 breeding cows and 4 breeding bulls, the N_e for that population would be 15.4, far closer to the population of breeding bulls than to the population of breeding cows. It is important to note that this formula will yield misleading results if all members of each sex, rather than only the breeding animals, are input. Please include calculations of N_e for the tule elk population resulting from each alternative treatment analyzed in the forthcoming EIS, and provide analysis of how this compares to ecological and genetic MVP for the herd. Managing the herd for a resulting N_e size below 50 would be expected. We are also concerned that elk at Point Reyes may be suffering from dietary deficiencies as a result of their confinement in the small area of Tomales Point. Gogan et al. (1989) found that plants and soils at Tomales Point were deficient in copper (an essential trace element), molybdenum, and sulfur-sulfates, and that elk were showing gross signs of copper deficiency, which may have been a contributing factor in the death of two elk in Spring of 1979. Gogan et al (1988) reported antler deformities in elk on Tomales Point, which they related to copper deficiencies. Cobb (2010) found that the most common cause of death for tule elk at Point Reyes was starvation, often accompanied with copper and selenium deficiencies. Twelve soil types underlie PRNS, based on differences in parent rock (NPS 1998). Only one of these, the Sheridan-Baywood soil type, is associated with the Tomales

Point area (id.), where copper deficiencies are known to occur. Removing the fence at Tomales Point and allowing elk free and unfettered access to all of PRNS permits elk to graze on vegetation growing from multiple geological substrates, thereby eliminating the specter of copper deficiencies and other dietary problems and disease vulnerabilities caused by confinement on Tomales Point. According to NPS policy, the National Park Service will seek to perpetuate the native animal life as part of the natural ecosystems of parks. Management emphasis will be on minimizing human impacts on natural animal population dynamics. Specifically addressing the management of California tule elk, Public Law 94-389, Preservation of Tule. Elk Population-California in 1976 states that: The Secretary of the Interior, the Secretary of Agriculture, and the Secretary of Defense shall cooperate with the State of California in making lands under their respective jurisdictions reasonably available for the preservation and grazing of tule elk in such manner and to such extent as may be consistent with Federal Law. The agency currently is not living up to these policy and statutory requirements on PRNS, but can correct this deficiency by permitting tule elk full and unfettered access to all of PRNS. We are concerned that elk limited to the Tomales Point enclosure lack adequate sources of water during drought periods. NPS (1998: 12) itself recognized this problem: The peninsula of Tomales Point ranges from a narrow tip to over a mile and a half wide at the fence line enclosing the elk range. There are no natural year-round streams. The natural streams have significant flows only during the rainy winter months. From late spring to late autumn, only spring-fed seeps would provide water for elk if not for the existence of eight water impoundments originally built for cattle. It has been reported that during the drought of 2012-2014, the Tomales Point elk herd declined by 47%, while over the same period the Limantour and Drakes Beach Herds increased by a combined 32% over the same period. In the forthcoming EIS, please present your analysis comparing the decline of elk in the Tomales Point Herd with corresponding population figures for the Drakes Beach and Limantour Herds, and provide scientific analysis of the role that water availability had in the decline of tule elk on Tomales Point. Removing the fence at Tomales Point and allowing the Tomales Point Herd full and unfettered access to all of PRNS would eliminate water scarcity problems that appear to have had a major negative effect on this herd in years past. With Climate Change, such extreme droughts may become more common in California, thus putting the Tomales Point Herd at risk again in the future. Shortly after the original reintroduction of tule elk in 1978, a number of subadults died from Johnes disease, or paratuberculosis, a disease they contracted from cattle (Watt 2015, Gogan and Barrett 1986, and see Gogan et al. 1989). We concur with the conclusions of the Point Reyes Scientific Advisory Panel (McCullough et al. 1993: 34): The long-range goal of elk management at PRNS should be the re-establishment of free-ranging elk throughout the seashore and associated public lands. This would involve removal of the fence across Tomales Point. NPS and California Department of Fish and Wildlife should develop a long-range management plan with the goal of achieving a large, healthy, free-ranging elk population subjected to a minimum of management intervention. Cobb (2010) projected that the greatest potential for elk population growth on Point Reyes was on ranchlands, and predicted increasing future conflicts. Phasing out domestic livestock on the National Seashore would eliminate this source of conflict. The National Park Service should comply with its legal, regulatory, policy, and past planning mandates and remove all barriers to tule elk expansion and recolonization of all lands within PRNS. The expansion of elk herds to all of their former native range would provide the herbivory with which all native plant communities (including rare native plants) evolved, therefore optimizing the opportunity for native plant and ecosystem recovery. The forthcoming EIS should fully analyze the differences between native and non-native plants and communities (evaluating richness, diversity, and presence/absence of rare plants and exotic weeds), with field data gathered from representative sampling of lands with tule elk only, those areas with domestic livestock, and those areas lacking both tule elk and domestic livestock (ungrazed reference sites, such as those discussed above). No elk population should be constrained in its population numbers or distribution within PRNS, and there are no scientifically defensible maximum population thresholds that can be legitimately applied on a scientific basis. Over time, all populations of tule elk should be permitted to expand and interbreed, and likewise, populations of blacktail deer (*Odocoileus hemionus columbianus*) should be permitted to expand in the absence of domestic livestock and other non-native herbivores. The Park needs to incorporate objectives to promote protection for the tule elk and to promote its full integration into natural communities in these park units. The parks preferred Alternative B appears to contain information about elk population sizes that appear to be incorrect. Please analyze guidance from the California Department of Fish and Wildlife (CDFW) Draft Elk Conservation and Management Plan (2017). The Alternative B proposes unsupported minimum and maximum population sizes for the Drakes Beach elk herd of 100-160 elk. These numbers are not supported by CDFW, are below minimum viable population thresholds, and the science behind these assumptions needs better analysis.

Tule elk may continue to be infected with Johne's disease with beef cattle, which can also be carriers. The pathways of Johne's disease spread from cattle to tule elk should be analyzed in the EIS. Specifically, how many of the cattle on Point Reyes are infected by Johne's disease. The NPS should require testing of all livestock on PRNS and GGNRA as part of the hard look and baseline information gathering required by NEPA. Any livestock found to be infected should be removed from Park Service-administered lands. To what extent can the bacteria causing Johne's disease capable of infecting humans, and what disease(s) do they cause? Are the bacteria that cause Johne's disease present in local waterways (particularly Kehoe Creek, which flows down to a popular beach and has documented E. coli exceedences)? To what extent are the bacteria that cause Johne's disease present in liquified manure that is spread on hilltops throughout the National Seashore? To what extent is the public at risk of contracting disease from Johne's bacteria from cattle manure, contaminated waterways, and/or manure-spreading operations? These are serious public health and safety questions that must be addressed in the forthcoming EIS.

Cobb (2010) did a resource selection function study that shows that tule elk would be expected to differentially select the same areas most productive for cattle. This argues for allowing elk in the 26,000-acre leased area.

Concerning social avoidance of elk to cattle, there is an abundance of scientific studies that have found that elk avoid areas that are being actively used by livestock. This is not simply about the loss of forage consumed by domestic livestock, but elk are socially displaced. If one presumes that animals always seek out the best habitat, social displacement means they are moving into less suitable habitat. It might be less palatable forage. It might be more vulnerability to predators or visitor disturbance. See Freilich et al. 2009, Kratville 1989, and Frisina 1992. The NPS should analyze this in its EIS.

Alternative A mentions hazing of elk to remove them from ranch pastures. Will ATVs or helicopters be used in elk management? Please analyze this in detail. Define pasture offsets.

Elk are getting entangled in cattle fences. This is unacceptable in a national park for native wildlife to potentially be harmed or die in fences. At the very least wildlife-friendly fences need to be constructed. Cattle fences should be limited in height to no more than 36 high, with the bottom strand at least 16 above the ground and made of smooth wire. These limits are necessary for wildlife passage, and should be required retrofits to existing fencing at the expense of the lessee.

No hunting should be allowed in Point Reyes National Seashore or Golden Gate National Recreation Area. The new GMP should prohibit all firearms carried by visitors, and firearms use of any kind except for law enforcement. There was a 1974 killing of a Park Ranger on Point Reyes, illustrating that in a high-population park setting close to urban population centers, the risk of gun violence is significant. This is a high-recreation-density landscape. If hunting was allowed, there would be no way to assure that recreational visitors would not be struck or killed by a stray bullet, either by hunters or by federal or state shooters in the context of killing native wildlife. In addition, hunting of tule elk would inevitably result in the shooting of non-target species, because a subset of hunters will shoot anything that moves, just for the thrill of it, and state and federal officials are in no position to prevent this. Any prohibitions on guns and shooting be carried forward into the new GMP.

The last of the axis deer and fallow deer should be captured and removed, and sent to zoos. There are still a few out in the park.

Biological Resources

The park should analyze how cattle grazing (both dairy and beef) impacts these native Natural Communities: Coastal Prairie - According to the park, in its newsletter announcing the latest planning process, Coastal prairie, the most diverse California grassland type, is a diminishing and particularly sensitive plant community with high conservation value. North Coastal Scrub - Dense scrub communities, as well as open coyote brush and bush lupine plant communities should be mapped, and their value to native wildlife, birds, and other species analyzed. Managing for a mosaic of open grassland and closed native scrub communities should be analyzed.

Wet Meadow - How many wet meadows have been degraded by cattle? These existing and potential communities should be mapped, and management actions to restore them analyzed.

Sand Dune and Beach - How much of this area is still grazed by livestock, and what are the impacts?

Riparian - How many miles of riparian vegetation is fenced off from livestock access? The different riparian types should be mapped, described, and analyzed as to their condition under livestock pressures. Opportunities for restoration should be discussed.

Freshwater and Brackish (Tidal) Marsh - What are the water quality impacts to these communities with beef and dairy ranching? What are the impacts of nutrient loading and eutrophication from manure inputs to streams? What are the siltation impacts due to erosion stemming from overgrazing? Marshes should be mapped, their condition measured, and restoration actions discussed.

Other Native Plant Communities - Such as Bishop pine forest, springs, fens, vernal pools, and other potential native communities that may be present. What sensitive or rare California native plant communities exist in the Pastoral Zone, what are the environmental impacts to them by livestock grazing and associated operations, what potential do they have to be restored?

Coyote Brush- -A pollen-spore-charcoal core analysis of one site in Point Reyes, going back to 7,000 years ago, shows the presence of coyote brush (*Baccharis pilularis*) and grasslands prior to European colonization (Anderson et al. 2013). This argues against the position that coyote brush expands "unnaturally" as a "weed" without livestock grazing. Depending on which point in time in this core you look, *Baccharis* and California sagebrush (*Artemisia californica*) shrubs have expanded and contracted in coastal grasslands according to the pollen counts over the millenia, and Native American burning had periods of greater and lesser intensity. Climate has also seen periods of aridity and increasing moisture. But coyote brush scrub has always been present as a native plant community, perhaps most like what we see at Tomales Point with elk grazing. The pollen analysis found coyote brush to be a natural part of plant communities in Point Reyes National Seashore: Charcoal influx in sediments prior to c. 4000 cal. BP is minimal, but small amounts of charcoal were deposited consistently in sediments between c. 4000 and 2200 cal. BP, with a higher influx after 2540 cal. BP. After c. 4000 cal. BP, pollen evidence suggests the beginning of development of the modern vegetation characteristics around Glenmire, not only with abundant conifers, *Alnus*, and *C. cornuta* var. *californica* (Figure 5) but also with continuing importance of open *B. pilularis* coastal scrub grassland. During the middle and late Holocene at Glenmire, the site was surrounded by a mosaic of vegetation types, including mixed conifer forest with coastal scrub grassland prior to c. 4000 cal. BP. Subsequently, the site witnessed an increase in hardwoods such as alder and expansion of coastal scrub (e.g. *Artemisia*, *Baccharis*) until c. 2200 cal. BP when tanoak, and particularly *Pseudotsuga* and *Sequoia*, expanded. Significant changes occurred over a very short period of time, beginning in the late 1790s but accelerating in the mid-1800s. These included the arrival of the Spanish Franciscans, removal of the native Coast Miwok population, the subsequent settlement for ranching by Mexican nationals, and land clearance for ranching and dairying by the Americans at the height of California's gold rush. The Glenmire record documents these changes with the (1) decreasing charcoal input following the 1793 fire suppression proclamation, (2) decline of native forest species, (3) arrival of non-native weedy invasive species associated with livestock grazing and land disturbance, (4) introduction of non-native trees for firewood and windbreaks, (5) an increase in coprophilous fungi associated with the presence of large numbers of sheep and cattle, and (6) changes in sedimentation type and rates associated with increased erosion around the site. (Anderson et al. 2013, emphasis ours). How will the park manage coyote brush and bush lupine? Please detail all mowing activities on ranches-how many acres of native shrubs are removed? In what areas? Maps should be provided. These species are not unnaturally expanding into grasslands, as long as native ecosystems including tule elk are allowed to inhabit these plant communities. We oppose any mowing of shrubs.

Johnson and Cushman (2007) found that elk had an overall positive effect on native species composition. Elk also appeared to play a critical role in maintaining open grasslands and preventing certain areas from being converted to less diverse, shrub-dominated systems.

Invasive Introduced Plants - Invasive, non-native plants cover approximately 1.4 million acres of National Park Service lands and waters, and are one of the most significant threats to native biodiversity. Coastal California ecosystems are especially vulnerable to invasive species due to a mild climate that allows for a long growing season, a past history of extensive disturbance and development, and a road network that creates corridors for the movement of invasive species contribute to the establishment and spread of invasive plants.

The NPS should prepare an Invasive Plant Management Plan, in a separate Environmental Assessment process, that includes such elements as prevention of new introductions of invasive plants, prioritization of invasive plants targeted for control, invasive plant detection, invasive plant treatments, recordkeeping and monitoring, re-vegetation after treatment, restoration of native plant species, and adaptive management to address future threats.

The draft EIS should document and analyze the effects of each alternative on the spread and control of invasive species. The distribution of invasive plant species, such as poison hemlock and milk thistle, in the Pastoral Zone should be mapped. Cattle are effective agents in dispersing exotic species and may disperse more than an order of magnitude more seeds than elk and deer per animal (Bartuszevige and Endress, 2000). Cattle can break and degrade protective soil crusts and thus increase the ability of invasive species to become established. The contribution of historic and current cattle grazing on invasive species distribution should be analyzed including the role of livestock in damaging sensitive soil crusts that can retard the spread of invasive plants. Is weed-free hay supplemented to livestock in the park? Animal Species - - The California Natural Diversity Database (CNDDDB) documents the following animal species many of which are impacted by livestock grazing in the Pastoral Zone and on GGNRA: Agelaius tricolor, tricolored blackbird *Antrozous pallidus*, pallid bat *Aplodontia rufa phaea*, Point Reyes mountain beaver *Ardea alba*, great egret *Ardea herodias*, great blue heron *Athene cunicularia*, burrowing owl *Caecidotea tomalensis*, Tomales isopod *Callophrys mossii marinensis*, Marin elf in butterfly *Charadrius alexandrinus nivosus*, western snowy plover *Cicindela hirticollis grvida*, sandy beach tiger beetle *Circus cyaneus*, northern harrier *Coelus globosus*, globose dune beetle *Corynorhinus townsendii*, Townsend's big-eared bat *Cypseloides niger*, black swift *Danaus plexippus*, monarch butterfly *Dendroica petechia brewsteri*, yellow warbler *Emys marmorata*, western pond turtle *Eucyclogobius newberryi*, tidewater goby *Fratercula cirrhata*, tufted puffin *Geothlypis trichas sinuosa*, saltmarsh common yellowthroat *Helminthoglypta nickliniana awania* Peninsula coast range shoulderband *Hydrochara rickseckeri*, Ricksecker's water scavenger beetle *Ischnura gemina*, San Francisco forktail damselfly *Lasionycteris noctivagans*, silver-haired bat *Lasiurus blossevillii*, western red bat *Lasiurus cinereus*, hoary bat *Laterallus jamaicensis coturniculus*, California black rail *Lavinia symmetricus* ssp. 2, Tomales roach *Oncorhynchus kisutch*, coho salmon - central California coast ESU *Oncorhynchus mykiss irideus*, steelhead - central California coast DPS *Pandion haliaetus*, osprey *Plebejus icarioides parapheres*, Point Reyes blue butterfly *Rana boylei*, foothill yellow-legged frog *Rana draytonii*, California red-legged frog *Speyeria zerene myrtleae*, Myrtle's silverspot butterfly *Spirinchus thaleichthys*, longfin smelt *Syncaris pacifica*, California freshwater shrimp *Taxidea taxus*, American badger *Vespericola marinensis*, Marin hesperian *Zapus trinotatus orarius*, Point Reyes jumping mouse

Livestock grazing and grazing related infrastructure may directly, indirectly and cumulatively impact all these species. Impacts include direct trampling and disturbance, habitat disturbance, loss of cover, habitat loss and fragmentation, changes in shrub density, loss of prey species, and changes in hydrology and water quality. The Park Service should analyze livestock grazing operations impacts to each of these species. Manure spreading could have serious impacts on wetland and aquatic species habitats, including bird, amphibian, fish, and shrimp. Excessive urine and fecal matter deposited by domestic animals may flow into the tributaries and stock ponds. Nutrient loading associated with such runoff may result in alteration of pH, dissolved oxygen, excessive nitrogen, or pathogens which may adversely affect all life stages of red-legged frogs and other native species. Cattle grazing in pasture lands contributes to water quality degradation through bacteria and nutrient loading from animal waste and runoff. Tomales Bay, Drakes Estero and Abbots Lagoon of Point Reyes National Seashore and northern Golden Gate National Recreation Area exhibit high levels of fecal coliform loading following heavy rainfall from sources including wildlife and cattle on ranches and dairies. This often results in harvest closures for cultured shellfish and must be monitored closely during rainy winter months (Pawley and Lay 2013: xlii). What are the impacts of livestock grazing on water quality of streams, ponds, lagoons, and shoreline ocean habitats for salmonids, tidewater goby, Tomales roach, freshwater shrimp, foothill yellow-legged frog and red-logged frog?

How do ranch management practices resulting in poor water quality, manure management, grazing of riparian vegetation, and erosion from beef and dairy cattle impact the California freshwater shrimp? This minute crustacean inhabits perennially flowing streams with slow moving water and flat gradients. Listed as Federally Endangered since 1988, the species is endemic to Marin, Sonoma and Napa Counties. It is only found in portions of 16 coastal streams within this range, including Lagunitas Creek in Marin County, which is home to the most viable population of the shrimp and is the only site on protected lands. Existing populations of the species are threatened by introduced fish, and deterioration or loss of habitat from water diversion, impoundments, livestock and dairy activities, agricultural activities and developments, flood control activities, gravel mining, timber harvesting, migration barriers and water pollution. Livestock grazing can negatively impact water clarity, water temperature, bank destabilization, overhanging vegetation-which creates microhabitats, and siltation. All creeks and streams with the potential for this species should be closed to livestock grazing, so that disturbances can end and restoration begin. LoBianco and Fong (2003 at 30), after surveying creeks in PRNS and GGNRA, noted that: Home Ranch Creek, like Cheda, Zanardi, and McIsaac, is also much degraded in sections, and yet has some excellent upstream habitat with some potential for shrimp inhabitation only with a great deal of modification to the surrounding developed environment. The exclusion of livestock, along with the diversion of waste run-off away from the creek, must occur for the possibility of future shrimp presence. How has the park worked with ranchers to repair/replace fencing and remove litter along creeks, in order to protect those streams from livestock encroachment, thereby increasing the likelihood of future habitat for California freshwater shrimp, and/or for other native organisms? The Myrtles silverspot butterfly inhabits coastal dunes, coastal prairie, and coastal shrubland, feeding as adults on the nectar of a variety of wildflowers, and requiring western dog violet (*Viola adunca*) as a host to its caterpillars (USFWS 2002). We are concerned that livestock grazing suppresses the growth, vitality, and distribution of native plants, and has therefore for years been impairing the viability of the Myrtles silverspot butterfly populations on Point Reyes National Seashore. The forthcoming EIS, as part of its NEPA hard look, should include field surveys of native flowering plants in pastures grazed by livestock and corresponding control areas where livestock are currently excluded, such that the magnitude of this negative effect on this endangered butterfly can be fully understood and disclosed. During field visits we found dog violets only on ungrazed roadsides that were fenced off from all livestock grazing. What is the most recent status of the Myrtles silverspot and its host plants? NPS should map the spatial extent of this obligate violet species on PRNS, and determine the extent to which livestock grazing has any effect on this plants distribution and abundance. According to Launer et al. (1992: 136), at PRNS, Myrtles silverspot butterflies were found at the Tomales Point tule elk range and throughout the bluffs, hills, grasslands, and back-dunes west of Drakes Estero and Schooner Bay. (USFWS (2002) determined that livestock are likely to have significant negative effects on the Myrtles silverspot butterfly, and recommended remediation by reducing the number of cattle, moving fencing, and/or changing the grazing regime. According to USFWS (2002: 21), grazing activities within the habitat of the Myrtle's silverspot butterfly may result in trampling of eggs, larvae, and adults. Additionally, grazing within the habitat may result in destruction of host or nectar plants via consumption, trampling, soil compaction, erosion, and other deleterious effects. The region-wide decline of the butterfly implies that such cumulative impacts have been significant and may eventually threaten the existence of the butterfly at PRNS. WWP and our members are concerned that the welfare of this rare species is currently being impaired by livestock grazing operations negatively affecting native flowering plants on PRNS. We are unconvinced that the spread of invasive weeds such as Italian thistle compensates for the loss or reduction of the native wildflowers, and would project that the elimination of cattle (and invasive thistles), paired with the recovery of native flowering plants and coastal prairie, would result in a strong net benefit to the Myrtles silverspot. Please provide scientific analysis confirming or contesting this assertion in the forthcoming EIS. Chinook and coho salmon as well as steelhead runs are found in the streams on PRNS, and each of these runs is listed as threatened under the Endangered Species Act due to past and ongoing human impacts on their habitats. As of 2004, steelhead had declined in abundance by 94% in the local region, while coho runs are extirpated in more than half of the regions streams that once supported them (NMFS 2004). The effects of past land use practices (development, logging, agriculture and grazing) have changed watershed conditions and reduced habitat for many aquatic invertebrates, fish and amphibians. Loss of native perennial vegetation and deep-rooted coastal prairie, soil compaction and loss, hillside trailing, gulying and incision of swales and meadows have changed the runoff patterns and reduced the capacity of the watershed to attenuate pollutant loading and surface runoff to streams. While the National Marine Fisheries Service downplayed the impacts of livestock grazing to anadromous salmonid runs, they noted a variety of types of negative impacts including increased stream temperatures, siltation of spawning gravels, and changes to stream

morphology, and observed that 16% of spawning stream reaches were unfenced, giving livestock direct access to streambanks (NMFS 2004). According to NMFS (2004: 40): NOAA Fisheries has directly observed a variety of stream reaches adjacent to grazing leases, including areas with and without riparian vegetation. Some of the adjacent stream reaches lack the habitat complexity needed for healthy juvenile salmonid rearing. Instream wood is largely absent. These conditions are locally limiting the amount of juvenile salmonids that survive to smolt age. These conditions also impact any adults that may migrate and spawn in these areas. NMFS (2004: 41) concluded: Once the NPS implements the actions described above, and continues resource monitoring and response, adverse effects to salmonids are expected to slowly reduce until in many cases they are minimal and unlikely to result in take. However, there are potential long term impacts from the grazing lease program that could result in harm to listed salmonids. NPS has estimated in the past that 16% of stream reaches occupied by native salmonids remain unfenced and accessible to domestic livestock. We are concerned that, because cattle in particular concentrate their grazing impacts along riparian corridors and wallow in stream-courses, that continued livestock grazing on PRNS will suppress the recovery of these listed fish species. Cattle are known to have the following negative impacts on stream habitats occupied by salmonids: (1) Suppression and removal of streamside shrubs that stabilize streambanks and shade stream reaches. (2) Overgrazing of herbaceous vegetation, resulting in loss of overhanging cover used by juvenile salmonids. (3) Increased erosion and siltation of streams, resulting in increased turbidity as well as smothering of spawning gravels with silt that results in suffocation of salmonid eggs and alevin. (4) Wallowing in streams resulting in disturbance or displacement of spawning adults and the physical crushing of salmonid eggs and alevin in their redds. (5) Physical breakdown of streambanks, converting narrow, deep streams to wide, shallow streams with little hiding cover from overhanging banks. (6) Raising of water temperatures above thermal optima for salmonids, resulting in stress, retarding growth, or causing death. (7) loss of instream hiding cover as a result of factors 1, 2, and 5 above, resulting in unnaturally high levels of predation on adults and young from avian, aquatic, and/or terrestrial predators. Please provide detailed, current, science-based analyses of the extent to which current and future livestock use on PRNS are causing or contributing to each of these causes of habitat degradation or direct impact on salmonids. Please pay particular attention to impacts to Olema Creek and its tributaries, Lagunitas Creek and its tributaries, and the tributaries of Drakes Estero, in addition to estuarine habitats which may be important staging areas. In addition, please provide analysis on the extent to which overgrazing and attendant erosion and siltation are causing problems for spawning salmon and steelhead by embedding spawning gravels with silt and suffocating redds, both in fenced and unfenced reaches of these streams. The California red-legged frog is associated with pond, creek, and wetland habitats, typically associated with slow-moving water 2 feet deep or deeper (USFWS 2002b). It is a listed species under the Endangered Species Act. According to USFWS (2002: 17), the grazing program is located within the proposed North San Francisco Bay/North Coast recovery unit which includes portions of watersheds at Point Reyes National Seashore and Golden Gate National Recreation Area. Within this recovery unit, red-legged frogs are threatened primarily by water management and diversions, non-native species, livestock, and urbanization. NPS should analyze how livestock grazing, water pollution, contaminants, and other agricultural developments can destroy, degrade, and fragment habitat for red-legged frogs. How many stock ponds are used as habitat by red-legged frogs? In general, the USFWS (2002: 21) found livestock grazing to be compatible with red-legged frogs, but observed the following potential impacts: However, red-legged frogs may be killed or injured by livestock that may crush them in both aquatic and upland habitats. Livestock activity in stockponds or streams may mobilize sediments or contribute to erosion or deposition of sediments. If heavy sedimentation occurs in pools where red-legged frogs breed, it is possible that red-legged frog egg masses will suffocate from being buried under sediments. Heavy loss of sediments from the streambed may result in down-cutting of channels which could further degrade the stability of banks, and functions of the riparian ecosystem. Additionally, degradation of riparian habitat and functions may result in the colonization of exotic predators such as bullfrogs. The EIS must analyze the extent to which adjacent upland connectivity habitats are negatively impacted by livestock grazing, and provide measures to ensure that such connectivity habitats are maintained in the future with tall native vegetation, such as coastal prairie plants, to provide hiding cover for frogs as they disperse among wetland habitats. NPS should examine a restoration model for red-legged frogs as was done at the Presidio in San Francisco, where artificially dug ponds were made as habitat, without the need for livestock. Western snowy plovers are a listed species that inhabit dunefield plant communities on Point Reyes National Seashore. They are vulnerable to negative effects from livestock grazing. According to USFWS (2002: 22): Grazing activities within the habitat of the western snowy plover may adversely affect the animal via trampling individuals or crushing eggs. Presence of cattle within nesting areas may result in nest failure due to western snowy plovers being flushed from their nests for extended periods

of time. For the most part, Point Reyes National Seashore has minimized the likelihood of such impacts by installing exclusion fencing in suitable habitat areas. 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. Ravens are known predators of western snowy plover chicks and eggs. Evidence points to 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. NPS should analyze in its EIS how ravens may be unnaturally high in population levels at PRNS/GGNRA from prey subsidization through such sources as rodent and bird mortality during silage harvesting. Please provide detailed analysis that includes the extent to which livestock have access to habitats used by western snowy plovers, the comparative abundance of ravens in PRNS livestock pastures versus areas where livestock are absent, and the extent to which livestock are having a negative impact on snowy plover populations. In April of 2018 the California Fish and Game Commission voted to protect the tricolored blackbird as a threatened species under the California Endangered Species Act. Tricolored blackbirds have been found on Point Reyes National Seashore, and have nested in the park. Yet the NPS has not undertaken, to our knowledge, any formal surveys of birds or nesting colonies recently. Using eBird or other crowdsourced databases should not replace focused NPS scientific population studies and monitoring. Tricolored blackbirds once formed massive nesting colonies of millions of birds in Californias marshes. But they have declined dramatically because of the destruction of wetlands and native grasslands, shooting and pesticide use. Mowing and harvesting crops that tricolored blackbirds use for nesting has also devastated populations. Tricolored blackbirds have declined by nearly 90 percent since the 1930s. Comprehensive statewide surveys found only 145,000 in 2014, a historic low level. The 2017 survey appears to show a small population rebound, with 177,656 blackbirds observed. The population increase came only after legal protections were put in place in 2016, but more needs to be done in places like Point Reyes National Seashore. We are particularly concerned that the mowing of silage fields during the nesting season may result in the take of tricolored blackbirds and their eggs/nestlings. What is the park doing to survey for this protected species, and ensure any nesting colonies are not destroyed during silage mowing activities? The forthcoming EIS must present baseline information and impacts analysis. NPS should analyze how native grassland birds are impacted by livestock grazing, silage mowing, and the loss of coastal prairie habitat cover for nesting. Grasshopper sparrows, Western meadowlarks, and other species may be potentially impacted by commercial ranching.

How are native predators such as badgers (*Taxidea taxus*), bobcats (*Lynx rufus*), gray foxes (*Urocyon cinereoargenteus*), and coyote (*Canis latrans*) managed in the ranching areas, and affected by livestock operations? Are ranchers allowed to trap, kill, or remove these important native mesopredators in the Pastoral Zone?

How are marine mammals, such as seals, sea lions, fur seals, sea otters, porpoises, and whales affected by lowered water quality coming from ranch and manure management reaching coastal waters? Plant Species - - The CNDDDB includes the following rare plant species which should be analyzed for impacts in the planning area: *Abronia umbellata* var. *breviflora*, pink sand-verbena *Agrostis blasdalei*, Blasdale's bent grass *Alopecurus aequalis* var. *sonomensis*, Sonoma alopecurus *Amorpha californica* var. *napensis*, Napa false indigo *Arctostaphylos virgata*, Marin manzanita *Astragalus pycnostachyus* var. *pycnostachyus*, coastal marsh milk-vetch *Blennosperma nanum* var. *robustum*, Point Reyes blennosperma *Calamagrostis crassiglumis*, Thurber's reed grass *Calystegia purpurata* ssp. *saxicola*, coastal bluff morning-glory *Campanula californica*, swamp harebell *Cardamine angulata*, seaside bittercress *Carex leptalea*, bristle-stalked sedge *Carex lyngbyei*, Lyngbye's sedge *Castilleja affinis* var. *neglecta*, Tiburon paintbrush *Castilleja leschkeana*, Point Reyes paintbrush *Ceanothus gloriosus* var. *porrectus*, Mt. Vision ceanothus *Chloropyron maritimum* ssp. *palustre*, Point Reyes salty bird's-beak *Chorizanthe cuspidata* var. *cuspidata*, San Francisco Bay spineflower *Chorizanthe cuspidata* var. *villosa*, woolly-headed spineflower *Chorizanthe robusta* var. *robusta*, robust spineflower *Chorizanthe valida*, Sonoma spineflower *Cicuta maculata* var. *bolanderi*, Bolander's water-hemlock *Cirsium andrewsii*, Franciscan thistle *Dirca occidentalis*, western leatherwood *Erigeron supplex*, supple daisy *Erysimum concinnum*, bluff wallflower *Fritillaria lanceolata* var. *tristulis*, Marin checker lily *Fritillaria liliacea*, fragrant fritillary *Gilia capitata* ssp. *chamissonis*, blue coast gilia *Gilia millefoliata*, dark-eyed gilia *Hemizonia congesta* ssp. *congesta*, white seaside tarplant *Hesperavx sparsiflora* var. *brevifolia*, short-leaved evax *Hesperolinon congestum*, Marin western flax *Horkelia cuneata* var. *sericea*, Kellogg's horkelia *Horkelia marinensis*, Point Reyes horkelia *Lasthenia californica* ssp. *bakeri*, Baker's goldfields

Lasthenia californica ssp. macrantha, perennial goldfields Layia carnosa, beach layia Leptosiphon croceus, coast yellow leptosiphon Leptosiphon rosaceus, rose leptosiphon Lilaeopsis masonii, Mason's lilaeopsis Lilium maritimum, coast lily Limnanthes douglasii ssp. sulphurea, Point Reyes meadowfoam Lupinus tidestromii, Tidestrom's lupine Microseris paludosa, marsh microseris Monardella sinuata ssp. nigrescens, northern curly-leaved monardella Phacelia insularis var. continentis, North Coast phacelia Piperia elegans ssp. decurtata, Point Reyes rein orchid Pleuropogon hooverianus, North Coast semaphore grass Polygonum marinense, Marin knotweed Rhynchospora californica, California beaked-rush Sidalcea calycosa ssp. rhizomata, Point Reyes checkerbloom Sidalcea hickmanii ssp. viridis, Marin checkerbloom Sidalcea malviflora ssp. purpurea, purple-stemmed checkerbloom Streptanthus glandulosus ssp. pulchellus, Mount Tamalpais bristly jewelflower Trifolium amoenum, showy rancheria clover Triphysaria floribunda, San Francisco owl's-clover Triquetrella californica, coastal triquetrella

These plants are susceptible to being eaten by cattle, being trampled by cattle, and to modifications of local hydrology and localized soil compaction induced by cattle and livestock operations and infrastructure. For each of these species, NPS must disclose areal extent and population sizes, threats to persistence, and impacts analysis of management actions (including permitted livestock grazing, if any) for each alternative. Excessive feces and urine deposition within or adjacent to areas inhabited by the Sonoma alopecurus, the spineflower, beach layia, Tidestrom's lupine, Tiburon paintbrush, and Marin dwarf flax may alter habitat conditions by fertilizing the nutrient poor soils, thereby making colonization by invasive species easier, which could ultimately out-compete the paintbrush and/or dwarf flax. Alteration of the habitat conditions through deposition of nitrogen derivatives may also lead to the extirpation of the paintbrush and dwarf flax from the site due to their adaptation to survive only on serpentine soils. Sonoma alopecurus is listed as an endangered species, is known from only 16 populations, and grows in riparian stream communities (USFWS 2002). According to USFWS, populations of this species are declining due to competition from nonnative plant species, trampling and grazing by cattle, as well as low regeneration (id., p. 6). That agency observed that both livestock grazing, and also fenced exclosures (which sometimes became choked with blackberries) had had detrimental effects on the species. Subsequent studies found that no type of livestock grazing produced consistent, statistically significant positive results for this species (Ryan and Parsons 2015). The obvious solution is to remove the livestock, remove the fences, and let tule elk do the grazing, which they had done in a manner compatible with this species since time immemorial, prior to 1850. Thurbers reed grass inhabits mesic areas in coastal scrub and freshwater marshes. Known in California from fewer than 10 occurrences according to the California Native Plant Society, it is present in Point Reyes National Seashore but is threatened by grazing. This is a U.S. Fish and Wildlife Service Species of Concern (formerly a category 2 candidate for listing). How will NPS manage this native grass to prevent it from declining further? There is no scientific evidence that so-called prescriptive livestock grazing can accomplish this in a superior way to grazing by tule elk, and indeed, grazing by tule elk and blacktail deer is what these native plant communities evolved with in the first place. Please provide any available analysis that indicates that grazing by non-native, exotic livestock would be superior to grazing by native ungulates to provide a scientific basis of support for prescriptive livestock grazing. In order to comply with NEPA, the NPS needs to perform a site-specific review and analysis of the effects of the proposed action and alternatives on all these plant and animal species. This should include documentation of all recent surveys. The NPS should ensure that adequate safeguards are in place to protect these species and their habitats and that any impacts to them are adequately mitigated. The NEPA analysis should include consideration of the direct, indirect and cumulative effects of the proposed action on these rare plants and their habitat.

Figure 26. Coyote on manure recently spread onto a field on L Ranch. What are the impacts to wildlife and native species of manure spreading in Point Reyes National Seashore?

Cultural Resources - Historic Properties A Cultural Landscape analysis should be undertaken for the Pastoral Zone, including a baseline inventory of all historic and modern buildings, ranch facilities, fences, roads, stock ponds, concentrated animal feeding stations, hay lots, silage fields, and manure stock piles. Modern loafing barns constructed to meet modern standards for dairies and manufactured homes should also be included in the inventory, and the relevance of these structures to park historical interpretation. These structures are eyesores

and detract from the National Seashores legally mandated mission to provide for public inspiration. The park should assess which properties do not meet the historic standard.

This should be undertaken in a Cultural Landscape Plan environmental review and report, to be completed as part of the EIS process, in the context of maintaining viable habitat for the special status aquatic species associated with the Pastoral Zone and sustainable visitor use. The report and review should include analysis of the preservation of historic structures, installation of modern visitor infrastructure, and monitoring equipment and planting and maintaining historically representative vegetation.

NPS Restoration standards allow for the depiction of a landscape at a particular time in its history by preserving materials from the period of significance and removing materials from other periods. This should be applied to the Pastoral Zone.

The Point Reyes Peninsula Dairy Ranches Historic District and the Olema Valley Dairy Ranches Historic District are now listed on the National Register of Historic Places. The 22,237-acre Point Reyes Peninsula Dairy Ranches Historic District was listed in the National Register in October, and the 14,127-acre Olema Valley Dairy Ranches Historic District was listed in April. More than 200 historic structures associated with the historic districts are located within the park ranches. How does modern industrial dairy and beef operations impact these historic structures? How will they be protected? The nomination of ranch cores and pastures to the National Register of Historic Places does not implicate the need that these places have humans working the lands in modern commercial livestock operations. These cultural resources can be managed as examples of coastal California dairies and beef ranches with historic barns and structures, that do not impede native wildlife, while interpreting the history of these ranches as is done at Tomales Point. These historic places should not include modern dairy barns and other facilities built in the last 20 or more years-these are clearly not historic. What level of extra scrutiny will be required with the Historic District designation? This designation does not require farming operations to continue. NPS needs to analyze the new designation and its significance concerning structures now existing: are modifications to any structures allowed to be made? Are new buildings allowed to be constructed in the historical area?

Have any lessees altered historical structures? Have any recent additions been constructed on historical structures without permission or permits? All buildings need to be documented, surveyed, and photographed to provide a baseline of condition, to ensure that no historical structures have been altered.

Alternatives must analyze a No Ranching option, where the park could preserve the integrity of historic structures but repurpose its use visitor centers or interpretive facilities, such as is done at the historic dairy at Tomales Point. Cattle are not needed here to maintain the historic scene. Other options should be analyzed besides commercial dairy and beef operations, which do not necessarily have as their goal maintaining a historic scene. Their goals are commercial production and profit-this is not a goal of the National Historic Preservation Act. The park should also analyze as part of its alternatives, how an Historic District could be maintained by excluding the Range portion of the ranches, and allowing only a very limited number of cattle, or no cattle, in the Core areas so as to maintain an historic character to the ranches, with visitor interpretation. NPS has the ability to maintain Historic Districts with one cow per ranch, if that is what is preferred to maintain a scene. The high stocking rate of cattle presently allowed is not necessary towards maintaining the look of historical landscapes. The current high stocking rate is degrading ranges, and at the very least, the stocking rate must be drastically reduced. There are other national park units such as Historic Battlefields that keep low numbers of livestock as part of the visual experience for visitors. These do not have to be commercial operations. The intensive agricultural business focus is degrading both biological and cultural resources. Reducing or eliminating stocking rates would not be inconsistent with a historic experience.

The park should analyze how these historic properties on public lands should be managed with respect to private residence and for-profit operations. Any options for increasing agricultural diversity in raising other forms of livestock, goats, sheep, poultry, and crops should be very carefully analyzed. We find these alternate agricultural diversification options to not be appropriate on lands managed by the National Park Service.

If this type and range of diversification is to be allowed in Point Reyes National Seashore, perhaps a full Concession Services Plan should be formulated and lessees made to enter into further agreements to aid in park visitor experiences, with full public comment and participation in a separate environmental review. We recommend against this diversification, however, and instead support a restoration of the Pastoral Zone to its wild state with native plant and animal communities, and no livestock grazing.

What indicators are used to measure visitor experience? Would visitors prefer more access to the Pastoral Zone? Livestock grazing can have significant impacts to archeological resources and cultural sites. Livestock, especially cattle, are known to impact archeological and cultural sites through trampling, wallowing, rubbing, dislodging, and crushing artifacts; chemical impacts resulting from urine and feces; and, erosion impacts. The EIS should explain how much of the Pastoral Zone has been surveyed for cultural resources, review the existing inventory of cultural resources, and analyze the effects of each alternative on these. The EIS should identify specific modifications to grazing management that will avoid and protect these irreplaceable resources, and provide specific monitoring protocols. NPS should detail how historic ranch buildings, such as old barns, have been impacted by modern commercial dairy and ranch operations? Are there any examples of damages down to historic structures from modern cattle ranching activities? The public needs to know about how these Historic Districts are being managed in a detailed analysis. How will renewed lease/permits help restore these historic facilities? How will modern facilities constructed in the last 30 years be dealt with in such an Historic District? Will new modern facilities, such as state-of-the-art loafing barn at I Ranch for dairy cows, be allowed in the future in these Historic Districts? If these new modern structures are allowed, we recommend that the historic designations be revoked.

Our interpretation of the Historic District designations would be that these protect the historic objects and the look of the scenery. Historic buildings should be protected. The park should analyze options for maintaining the look of a historic scene, but this does not need to be over the entire ranch property-this could be in the Core areas, while restoring most of the ranches to native coastal prairie, other native plant communities, and native wildlife.

Looking at other Historic District and Cultural Landscape designations by NPS, it does not seem that anything other than an interpretive level of people and livestock is needed, if any. Not a large stocking rate to support a for-profit commercial operation. NPS should analyze an alternative that has no livestock here, and maintains the buildings for tours. Interpretive rangers could dress up in historic costumes for the period to lead visitors on tours.

NPS should compare how the Tomales Point area is managed successfully as an Historic object with popular visitor interpretation of old dairy buildings, old cypress trees, and other features, while restoring the rest of the area to a natural condition with tule elk. This could serve as a model for how Historic Districts are restored and managed, without commercial operations dominating the park.

The interpretative level for historic ranching is very low. So far as we know, there are no park tours of the ranches, and not a single working ranch where park visitors are welcome. The one ranch where the real owners, American taxpayers and the global public, are welcome to roam and have interpretive signs about the history, and absorb the place, is Pierce Ranch, where the cattle count is zero.

The historic Scotty's Castle in Death Valley National Park originally had livestock in fenced areas. But now the park has no livestock here, and maintains the buildings for tours. Interpretive rangers dress up in historic costumes for the period around the early 1900s to lead visitors on tours. We maintain that there are many options for Historic Districts.

Feedlots (open-air or loafing-barn) as in I Ranch and the Kehoe Ranch, and other obviously modern structures such as manufactured homes, detract from the historic character of PRNS and need to be dismantled and removed.

Water Quality Direct effects of grazing on riparian areas include increased sediment deposition in streams, water quality impacts such as elevated levels of fecal coliform bacteria, head-cutting and localized changes in hydrology, breakdown of stream banks, disturbance and/or destruction of streambeds, destruction of riparian vegetation, and impairment of the ability of riparian vegetation to recover. Indirect effects include changes to nutrient cycling and thermal effects, and increase risks for spread and establishment of invasive species and algal blooms. Water quality is an issue in the annual grasslands. Sediment, nutrients, pathogens and heat are potential water pollutants that may be associated with grazing in annual grassland watersheds. In 2004, California's State Water Resources Control Board adopted policies for regulating non-point source pollution. These policies affect landowners and agricultural producers, including range livestock operations. This new policy replaced a voluntary, education-supported program with regulatory programs, such as implementation of total maximum daily load (TMDL) requirements for non-point source discharges from agricultural lands, including grazing land. The NPS should analyze non-point source pollution on all ranches, and impacts to surrounding park lands and waters. The waters of Point Reyes National Seashore rank in the top 10 percent of U.S. locations most contaminated by livestock feces indicated by *E. coli* bacteria, according to a report released by Center for Biological Diversity. Point Reyes National Seashore has been one of the 10 most feces-contaminated locations monitored in California since 2012. The states highest reported *E. coli* level was on a Point Reyes cattle ranch. The high fecal coliform measures came from wetlands and creeks draining ranches in the popular public Kehoe Beach area of Point Reyes National Seashore. Eight locations in the Olema Valley that receive runoff from cattle ranches in GGNRA also high fecal bacteria levels. Pawley and Lay (2013) indicated severe pollution occurred at dairy locations, including North Kehoe Creek, at the J Ranch and K Ranch property line, the L Ranch Impact Yard, the A and B Ranches, and the McClures dairy swale. How many times has NPS issued health warnings for park water bodies, or closed beaches or lagoons to public access? The Park Services 2013 Coastal Watershed Assessment for Point Reyes National Seashore (Pawley and Lay 2013) 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 Service allows dairy ranches to spread liquid cattle manure on grasslands throughout the park. The NPS report 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. NPS should analyze these impacts in its EIS.

Contamination of water by bacteria is one of the leading causes of impairment in U.S. surface waters. While many bacteria occur naturally in the environment and are an important component of many ecosystem processes, some are of concern because they may cause diseases. These bacteria (*E. coli* 0157:H7, *Salmonella*, etc.), as well as viruses (enteroviruses, adenoviruses, etc.) and some protozoans (*Cryptosporidium*, *Giardia*, etc.), are referred to as pathogens. Most are found in the gastrointestinal tract of humans and other warm-blooded animals and are shed in the feces. The presence of *E. coli* can be used as an indicator of the presence of fecal contamination. Significant sources of fecal material to lakes and streams includes wastewater discharge, stormwater runoff, and manure runoff. The fecal material in these sources can come from farm animals. Many of the bacteria within feces can survive in environments outside of the animal, thereby elevating bacteria concentrations as they enter a stream. EPA estimates that one dairy cow can produce about 120 pounds of wet manure in a day, with 80 percent being water. These values indicate that even a small quantity of fecal material escaping into surface water from livestock can cause a substantial impact. Regardless of whether the polluting animals are sick or healthy, they can transmit pathogens in their manure. Fecal material also contains nutrients and organic matter. Nutrient addition to surface waters, particularly phosphorus and nitrogen, can increase algal growth, decrease water clarity, and increase ammonia concentrations which can be toxic to fish. The increased organic matter also serves as a food source for bacteria and other microorganisms, resulting in lower oxygen levels in the water, and often no oxygen in deeper bottom waters. During a heavy storm, the precipitation can wash off the land and flow to lower areas, or soak into the soil and either be taken up by rooted vegetation or continue flowing deeper (infiltrating) into the ground, eventually reaching groundwater. Eroded, degraded annual grasslands grazed by cattle may provide less ability to trap pathogens. Manure recently applied to land prior to a heavy rainfall or to wet ground, can also be washed into nearby streams. Additionally, livestock with access to streams are not only a direct source of manure to the stream but can also erode and damage stream banks as they enter the water, which also results in increased inputs of nutrients and sediment. When manure escapes from the application site can contaminate surface water and groundwater. Runoff from the farmstead, pastures and fields where manure has been applied can transport sediment, organic solids, nutrients and pathogens to surface waters. Vegetative buffers are not able to effectively capture most fecal coliform bacteria. Only removing cattle (both beef and dairy) will remove this health problem

from national park watersheds. Climate change may lead to increased winter storm events of larger severity, which could cause more manure runoff into streams along the Pacific Coast. Prohibiting livestock from accessing streams and other surface waters is another effective way to reduce water pollution and also maintain stream habitat. Fencing off areas that have direct stream access keep livestock from trampling stream banks, increasing erosion, and destroying vegetation along the stream bank. It also prevents livestock from defecating directly into the water. We saw no fences along Kehoe Creek or several other creeks, and manure spreading happens within meters of creeks. NPS should detail how manure management is done so that human health is taken into account, and pathogens minimized or eliminated. Figure 27. Kehoe Creek in Point Reyes National Seashore with manure storage pond, and trucks taking up liquified dairy manure to spread on fields. This pond is very close to the creek. How does the park manage health risks? Does NPS require dairies to follow Best Management Practices with respect to manure-spreading: These might include, as standard in other parts of the country: inject manure into the soil, apply manure to relatively dry fields, avoid steep slopes, avoid areas near water bodies, avoid spreading manure in areas prone to flooding, and fence off stream access areas? These practices may be difficult to achieve at Point Reyes and GGNRA due to the rainy and foggy conditions on this coastal grassland. The EIS should detail how Best Management Practices are achieved. Water quality testing in all water bodies in the park units should occur quarterly because pollution levels will vary based on certain variables, such as the location of cattle on a ranch in terms of which pastures they are in and not in, and the effect of seasonal variations in water levels or flows which would cause pollution levels to vary. The NPS should conduct a cumulative watershed effects analysis for the watersheds in the project area, including a water balance of the water removed from the watershed to water the livestock as well as to dilute the manure to allow manure spreading in the park, and should present this data in the draft EIS. The EIS should also discuss the measures that will be taken to eliminate or reduce any impacts. What watershed-level surveys have been conducted? On its website for the park, NPS gives a 2016 update: As required by the grazing waiver issued by the Regional Water Quality Board, Range staff completed surveys and submitted annual certification forms for the ten ranches in the Tomales Bay Watershed. What are the results of this water quality survey, and what surveys have been carried out since then?

We have seen ranches in Point Reyes National Seashore, including areas impacting Kehoe Creek, allow manure spreading by various trucking means across pastures. These appear to show sludge-slurry trucks spraying fields, trucks piping manure slurry from holding ponds, trucks releasing manure onto a field, and a liquified manure sprinkler system on a pasture. How are these methods compatible with a national park unit? What are the human health hazards of such methods? NPS needs to describe each method for disposing of manure on each ranch, as well as the impacts to wildlife, biological resources, sensitive species, native plant communities, visitor experience, water quality, and human health. How much manure is spread on pastures, grasslands, or cut silage fields? How close are these to creeks, streams, and the ocean? In what seasons are these manure spreading operations undertaken-spreading manure in the fall before and during rain storms can have serious runoff problems into streams and the ocean. In the Midwest, dairies are using methods that lessen the pollution of water bodies from runoff by injecting manure into the ground. Are any ranches required to do this by NPS in order to reduce the risk to human health?

The park examine show how watersheds at PRNS and GGNRA are impaired by being severely polluted. This should trigger enforcement actions. Severe pollution should trigger actions implementing the wording in the 1916 NPS Organic Act about keeping Parks in an unimpaired state.

Figure 28. Manure piles on L Ranch.

Figure 29. Truck spreading liquified manure.

Figure 30. Liquified manure being spread onto cow pasture by a sprinkler system.

Figure. 31. Liquified cow manure from pond piped into spreader truck.

Figure 32. Solid manure spread from a truck onto a field.

Human Health Concerns As *E. coli* concentrations increase in surface waters, it is likely that some type of fecal contamination has occurred. When the concentrations exceed water quality standards, people are at a greater risk of coming into contact with pathogens. The most common illness associated with exposure (swimming, ingestion) to fecal-contaminated water is gastroenteritis, which can result in nausea, vomiting, abdominal cramps, fever, headache, and diarrhea. Swimming in impacted waters can also lead to eye, ear, nose, skin, and throat infections and respiratory illnesses. In rarer cases, contaminated waters can lead to more serious conditions such as hepatitis, salmonellosis, or dysentery. Agricultural waste products are posing a health hazard for beachgoers at some parts of the National Seashore. Johnes disease should also be fully analyzed. Dairy and beef cattle are infected with Johnes disease, a chronic wasting intestinal disease, which spreads to native elk and may be a public health and safety hazard as well.

NPS needs to analyze any human health nexus of Johnes disease of livestock, with similar human diseases. Inflammatory bowel disease refers to a group of chronic inflammatory diseases of the gastrointestinal tract, including ulcerative colitis and Crohn's disease. Due to the similarities between Crohn's disease and Johnes disease, a chronic enteritis in ruminant animals caused by *Mycobacterium avium* paratuberculosis (MAP) infection, MAP has long been considered to be a potential cause of Crohn's disease. MAP is an obligate intracellular pathogen that cannot replicate outside of animal hosts. MAP is widespread in dairy cattle and because of environmental contamination and resistance to pasteurization and chlorination, humans are frequently exposed through contamination of food and water. Given the strong similarities between Johnes's and Crohn's disease, it has long been hypothesized that MAP could be the etiological agent of Crohn's disease. Crohn's disease is a chronic inflammatory bowel disease of unknown cause, affecting approximately 1.4 million North American people (McNees et al. 2016).

How will NPS ensure human health in the park with the prevalence of Johnes disease in many livestock? The L Ranch lease/permit says: Lessor shall, at any time, have the right to revoke this lease in accordance with the terms of 16. U.S.C. § 459c et seq., or in accordance with other applicable Provisions of this Lease. Lessor also has the right to revoke this Lease for any reason in Lessors sole discretion after first providing Lessee with one years written notice. Notwithstanding the foregoing sentence, if Lessor, in its sole discretion, determines that there is a significant health or safety risks to persons or property associated with Lessees continued use or occupancy of the Premises, Lessor shall have the right to revoke this Lease after first providing Lessee with 60 days written notice of such revocation. Point Reyes National Seashore Agricultural Lease/Permit Historic L Ranch. Section 5.2. June 1, 2009. How will NPS implement phasing out leases that contribute to human health threats?

Figure 33. Truck spreading liquified cow manure onto a field in L Ranch. This should not be allowed in a National Park unit. Soil Processes, Erosion, and Compaction Livestock grazing can lead to soil compaction, massive soil erosion, and sediment flows into streams, which will harm fish and aquatic invertebrates in freshwater streams, brackish lagoons, and nearshore ocean habitats. The environmental review should consider grazing impacts to all soils in the Pastoral Zone from trailing, high-impact areas next to feed troughs and water facilities, ranch core areas, and heavily grazed grasslands where soils are being lost from trampling and erosion. Trampling from beef and dairy livestock also causes increase runoff during rain storms, as well as decreased vegetative cover to hold soils in place. The alternative that restores deep-rooted coastal prairie and native wet meadow plant communities should be analyzed in detail as to how these management options could vastly increase soil stability, soil formation, and groundwater retention. Increased live vegetation and dry residual plant matter has been shown to increase soil moisture and rainwater retention.

Figure 33. Soggy, rain-soaked bare ground from cattle concentration on L Ranch. A lagoon and the Pacific Ocean are in the distance. How much soil and manure pollutants are washed into streams, lagoons, and the ocean from dairy and beef ranches?

Erosion is also a significant problem in the watershed. Sedimentation from Lagunitas Creek into Tomales Bay resulted from nineteenth century logging and cattle grazing of riparian plants which otherwise slow erosion. Livestock grazing continues to erode slopes, downcut stream headwaters, and remove deep-rooted vegetation such as native bunchgrasses (see Figure 24). How will the park decrease erosion?

Socioeconomics

Local residents are unconvinced that dairy and beef operations in PRNS/GGNRA make economic sense.

The Park Service has found only about 100 jobs in Marin relating to ranching operations at Point Reyes, compared to 2.5 million yearly visitors who contribute over \$100 million to the local economy and provide long-term sustainable employment to roughly 1,244 people, representing \$54 million in labor income in 2017.

Headwaters Economics most recent tabulation for Use Sectors in its Economic Profile System shows that in Marin County the agricultural industry accounts for 0.2% of jobs, while the tourism-recreation industry accounts for 19.6%.

Marin County's dairy industry continues to slump due to milk overproduction and changes in public consumption habits, as food habits shift. Subsidizing dairy operations on public lands as ranchers struggle in an overcrowded market should not be the purpose of a national park.

According to the Marin Independent Journal, local organic dairies face lower prices and are seeking to diversify their product, such as poultry. National Parks should not be the place to prop up markets such as these. NPS should analyze how many major dairies in Marin County buy milk from Pastoral Zone ranches, and what the total contribution of dairies on park lands is to the economy. NPS's NEPA analysis must include an analysis of the extent to which the beef and dairy operations currently on PRNS and GGNRA could be relocated to private lands in the general region. Silage and hay are trucked by the ton from the Central Valley to supplement the apparently inadequate forage on PRNS and GGNRA. Are private lands available in the Central Valley (or bordering foothills), so the cattle could move to the forage, instead of the other way around? To what extent are private agricultural lands available in Marin County to accommodate beef and dairy operations from Point Reyes and GGNRA? To what extent do ranches currently operating on PRNS or GGNRA already own lands and run livestock on private lands outside these NPS properties? These are important questions that must be addressed to satisfy NEPA baseline information and hard look impacts analysis for each alternative. When Congress authorized buying the ranchers' lands in 1978, it made clear that ranchers could only reserve 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. 16 U.S.C. § 459c-5(a). This was intended to ease any economic hit to the county. But the economic situation has changed drastically today. Congress never expressed the intent that dairies and ranches continue operating indefinitely, which would be inconsistent with the Park Service's mission and the Act that created the Seashore. Air Quality and Greenhouse Gas Emissions

Carbon Farming is a common theme proposed by livestock operators currently, yet the benefits of manure management are outweighed by removing livestock altogether and restoring deep-rooted native bunchgrasses and forbs to former ranges. Manure impacts to water quality and human health outweigh any benefits of manure-spreading on landscapes. This should be discussed and analyzed carefully in the forthcoming EIS.

Cattle actually decrease carbon sequestration by suppressing and eliminating native perennial bunchgrasses with their large underground biomass in the form of deep root networks. The argument that cattle ranching helps sequester carbon is dubious given that removing cattle completely and restoring native herbivores would sequester carbon at higher rates.

Native plant communities can have a very important role in sequestering atmospheric carbon, yet disturbances to vegetation and soils can release this carbon. Even livestock-oriented groups admit this: Without restoration technology to consistently and economically restore deeper-rooted native perennial grasses and forbs, the opportunities to increase the storage of carbon in this ecosystem are limited. The one exception is on sites where tree planting can be successful.

The Pastoral Zone, as we have detailed above, consists largely of introduced weedy European annual grasses and forbs, with shallow roots, allowing soil erosion to accelerate. Deep-rooted native coastal prairie bunchgrasses

have largely been eliminated by heavy beef and dairy cattle impacts, and survive in only small relict sites. Restoring these deep-rooted native grasslands to more of the ranches by reducing livestock grazing would go a long way towards Carbon sequestration. The Park should document compliance of the ranches with the Clean Air Act and regional Air Quality Management District guidelines. Ammonia and noxious gas production levels from the beef and dairy facilities should be disclosed in the EIS. The EIS should provide information about the changes that are likely to occur in the project area due to climate change over the coming decades. In the western United States, both the frequency of heavy precipitation events and the frequency of periods of drought have increased over the past century (Christensen et al., 2018, Regional Climate Projections, IPCC Fourth Assessment). While uncertainties remain regarding the timing and extent of impacts from climate change, modeling indicates that on average, California will likely experience longer dry periods; more heavy precipitation events; more frequent droughts; and increased wildfire risk. These changes will affect the project area, especially riparian and water resources and the species that depend on them as well as the amount and availability of forage. NPS must evaluate the proposed actions in the context of climate change as both a baseline issue and a cumulative impact to the resources and impacts from livestock emissions on climate change. Methane emissions from park livestock operations must be quantified and analyzed, including for their impact to climate change, as part of NEPAs hard look and baseline information requirements. What mitigation measures will be used to offset methane emissions from beef and dairy cattle? What are the quantified truck greenhouse gas emissions from shipping supplemental hay into the park annually, as well as emissions from hauling out of the park the livestock bound for market? Visitor Use, Experience, and Access Point Reyes National Seashore was originally established in part for the purposes of public recreation, benefit, and inspiration. NPS must fully analyze the extent of livestock impacts to these National Seashore legal obligations, and also the extent to which further leasing of public lands on PRNS is incompatible with this primary mission of the NPS on this unit. By 2020, it is projected that more than 8 million people will live in the San Francisco Bay Area (Pawley and Lay 2013). As of the late 1990s, Point Reyes National Seashore was receiving more than 2.5 million visitors per year (Ferry and LaFayette 1997). The latest figures, from 2016, are consistent with this total. NPS should analyze how livestock grazing impairs the interests of millions of Americans on these public lands, to extend the for-profit interests of a dozen or so families who have already accepted payment to give up their former lands. The Pastoral Zone is currently a very popular wildlife viewing area. Bobcats, badgers, coyotes, and birds are the subject of visitor interest, wildlife-watching, photography, and nature sketching and study. Yet public access to the ranches is impaired by fences, lack of trails and access points, lack of parking areas, the presence of sometimes intimidating large cattle, and perceptions that areas are private property.

Equity and Inclusion issues with respect to making public lands more accessible to a wide group of people are increasingly important in society. The park should analyze how the PRNS/GGNRA ranches are virtually privatized to a few commercial interests, and not widely publicly accessible to a diverse array of park visitors.

Increased visitor access to the Pastoral Zone should be analyzed in all alternatives. According to the NPS newsletter, all alternatives proposed in the GMP amendment would include these recreational planning measures: The NPS would strive to improve hiking, biking, and equestrian access in the planning area. The planning area is generally open to public access, including active grazing areas in applicable alternatives, but additional route designation and promotion would help visitors better enjoy and experience the area. Trail opportunities would focus on loop routes, connectivity with adjacent public lands, and facilitation of north-south connectivity across the landscape. Potential routes would primarily use abandoned or administrative roads (including ranching roads); new trail construction would be very limited. Most routes would be minimally maintained and would have a rural, backcountry character. The NPS would expand interpretation of historic districts and current ranching in the park, and as appropriate, would collaborate with ranchers and other partners to interpret the story of ranching in the park. The NPS would look for opportunities to expand day use facilities such as picnic areas and overnight accommodations in the planning area. These activities would be focused in previously disturbed areas, such as former ranch complexes, and may take advantage of adaptive reuse of historic buildings where possible. Implementation of any of the options would depend on availability of an appropriate location as well as the operational capacity of the NPS and/ or ability to work with partners to support the operation. The NPS would explore additional or expanded shuttle use as a tool to manage visitor use and facilitate transportation in the park. We agree with increasing trails and visitor facilities in the Pastoral Zone. NPS should not focus interpretation on

ranching or ranching history, but rather focus interpretation on natural landscapes, wildlife, and native plant communities. Visitor use surveys should be undertaken before any planning is started, as we believe that most visitors come to PRNS/GGNRA to view wildlife and hike in wild natural landscapes, not view more cattle ranches that dominate the North Coast Range already in California, which is predominantly in private hands. Wilderness

The GMP Amendment Planning Area does not include the Phillip Burton Wilderness Area within Point Reyes National Seashore, yet some of the proposed alternatives will impact the wilderness directly and indirectly. Preserving wilderness character is an overarching mandate of the Wilderness Act. Indeed, a paper authored by five wilderness experts states: The purpose of the mandate to protect wilderness character above all else is to focus the attention of wilderness stewards on preserving the essence of wilderness- those qualities that are most unique and distinctive about wilderness and make it a contrast with those areas where man and his own works dominate the landscape. It is about differentiating the most important things to protect from the many other things that ideally might be protected in wilderness. For this purpose, wilderness character must be defined as a coherent whole, in a manner that is not internally contradictory. It cannot be broken down into separate qualities. Cole et al. (2015) at 3. The EIS, aside from analyzing the impacts to wilderness character, should evaluate impacts to things we value in Wilderness: natural conditions and opportunities for solitude; scenic values; primitive recreation value, such as hiking, camping, photography, and wildlife viewing; the unspoiled state of natural landscapes. Wildernesses provide valuable habitat for wildlife, biodiversity, watershed protection, and overall healthy ecosystems. Wildernesses protect cultural resource values by the lack of intensive human access and activity. The EIS should analyze a future option for removing ranching in the Pastoral Zone, restoring native plant communities and wildlife, removing fences and livestock facilities, closing certain roads, and mapping Lands with Wilderness Characteristics in roadless portions of the current ranches. Will fences similar to those confining the Tule Elk Reserve on Tomales Point be constructed around the perimeter of or just inside the Philip Burton Wilderness to keep free-roaming tule elk from entering the Pastoral Zone? This would significantly impact wildlife connectivity and visitor experiences of wilderness quality in the park.

How large will the buffer areas be inside wilderness? What activities will be allowed within wilderness next to the Pastoral Zone?

Figure 34. This 8-foot-tall elk-proof fence encloses the Tomales Point Tule Elk Reserve to keep elk out of the Pastoral Zone. Will similar wildlife-exclusion fences need to be built under Ranching Alternatives in order to keep the free-roaming Drakes Beach tule elk in the Philip Burton Wilderness out of the ranches inside Point Reyes National Seashore?

The draft EIS should be very specific about hazing methods-who will use these methods-park staff or ranch lessees? Will ATVs or helicopters be allowed in the wilderness buffers to haze elk away from ranch leases?

The park should describe in detail what lethal methods may be used to reduce the Drakes Beach herd inside and outside wilderness. In the past, the National Park Service has suggested that the use of helicopters in wilderness might be desirable in the context of tule elk management (NPS 1998). However, the use of helicopters in wilderness associated with elk management is flatly illegal under the Wilderness Act. The GMP must by law preclude the use of helicopters for elk management in wilderness areas under the forthcoming GMP. Point Reyes National Seashore Wilderness management should follow National Park Service Wilderness Policies, specifically the Wilderness Stewardship Reference Manual 41 (RM-41). This offers comprehensive guidance to National Park Service employees responsible for managing and preserving wilderness character and the wilderness resource throughout the National Park System.

The purpose of Reference Manual #41 is to provide superintendents and park staff with the essential information on the laws, policies, and procedures applicable to wilderness preservation and management within the National Park System. The Reference Manual contains National Park Service Management Policies and supplemental information needed to assist managers in meeting their responsibilities toward the wilderness resource. The Reference Manual also includes NPS Director's Order # 41 that provides further clarification and interpretation of the Services wilderness policies. The goal of the Reference Manual is to provide as much information as

practical to assist field managers in making both day-to-day and long-term decisions affecting National Park Service wilderness. Relevant passages include these:

Reference Manual #41

6.3.7 Natural Resources Management. The National Park Service recognizes that wilderness is a composite resource with interrelated parts. Without spectacular natural resources, especially indigenous and endemic species, a wilderness experience might not be possible. Natural resources are critical, defining elements of the wilderness resource, but need to be managed within the context of the whole. Natural resource management plans will be integrated with and cross-reference wilderness management plans. Pursuing a series of independent component projects, such as single species management, in wilderness will not necessarily accomplish the overarching goal of wilderness management. Natural resources management in wilderness will include and be guided by a coordinated program of scientific inventory, monitoring, and research.

The principle of non-degradation will be applied to wilderness management, and each wilderness areas condition will be measured and assessed against its own unimpaired standard. Natural processes will be allowed, in so far as possible, to shape and control wilderness ecosystems. Management should seek to sustain natural distribution, numbers, population composition, and interaction of indigenous species. Management intervention should only be undertaken to the extent necessary to correct past mistakes, the impacts of human use, and the influences originating outside of wilderness boundaries. Management actions, including restoration of extirpated native species, altered natural fire regimes, controlling invasive alien species, endangered species management, and the protection of air and water quality, should be attempted only when the knowledge and tools exist to accomplish clearly articulated goals. (emphasis added)

6.4.6. Grazing and Livestock Driveways. Commercial grazing or driving of livestock in park wilderness will be allowed only as specifically authorized by Congress. Where these activities are authorized, they will be managed under conditions and requirements identified within the approved wilderness management plan and corresponding allotment management plans. The use of motorized vehicles, motorized equipment, or mechanical transport by grazing permittees will not be allowed except as provided for by a specific authority. The construction of livestock management facilities other than those specifically authorized by legislation is prohibited.

Directors Order #41, Wilderness Stewardship

6. Wilderness Stewardship: The goal of wilderness stewardship is to keep these areas as natural and wild as possible in the face of competing purposes and impacts brought on by activities that take place elsewhere in the park and beyond park boundaries. NPS employees should understand this goal, work together and engage other agencies and partners to provide for an enduring resource of wilderness. NPS should carefully consider the above mandates when delineating the GMP revision, and discuss these policies in the draft EIS. Restoration NPS should detail a plan of native plant restoration, as it had been doing several years ago. PRNS wrote on its website: Less than one percent of California's native grassland is still intact today. The northern coastal prairie, which extends into Oregon, is the most diverse type of grassland in North America. Pristine patches of this vegetation still grow at Point Reyes on either side of the San Andreas Fault. Deschampsia coastal prairie is found on the Point Reyes peninsula and Danthonia coastal prairie is found on Bolinas Ridge. Coastal prairie is dominated by long lived perennial bunchgrasses, such as Purple needlegrass (*Stipa pulchra*), California fescue (*Festuca californica*) and California oatgrass (*Danthonia californica*), all of which can stay green year round with the moisture provided in the fog belt. By 1850, dairy ranchers had arrived at Point Reyes, lured by the near-ideal conditions for raising cattle. Since then, ranchers planted many non-native grasses, many of which were invasive and began to out-compete the native grasses. The most common forage plants seeded on these lands are Italian ryegrass (*Lolium multiflorum*) and clover (*Trifolium* sp.). While these are non-native species, they fortunately are not invasive. Unfortunately, invasive non-native grasses, such as Velvet grass (*Holcus lanatus*), Harding grass (*Phalaris aquatica*), and Tall fescue (*Festuca arundinacea*), were planted as well. The National Park Service now prohibits the planting of these invasive species in the approximately 7300 hectares (~18,000 acres) of grazing allotments

within Point Reyes National Seashore and the north district of Golden Gate National Recreation Area. Since 2000, the National Park Service has been attempting to increase native seed use in these pastoral zones. Some species of native grass seed are commercially available, but it is expensive, and would not reflect the local genetic variations. The ideal conservation strategy is to collect seed from local grasses, send it to a nursery, and have it grown out on a landscape scale to create a supply for restoration projects. This has been done with California brome (*Bromus carinatus*) seed collected in the park which, by April 2007, had been multiplied to over 40 kilograms (900 pounds). This supply is enough to seed approximately 30 hectares (75 acres). One site at which the National Park Service is attempting to restore native grassland is the 485-hectare (1200-acre) historic D-ranch. Italian ryegrass, a non-native annual planted for forage, dominates the original homestead area today. Monitoring in this area determined that less than 5% of the vegetation was native before treatment. Two prescribed burns and native grass seeding on half of a 24-hectare (60-acre) burn unit had been completed by April 2007; but so far, not much has changed. The seed that was planted, California brome, is the most abundant native grass on the site. It has persisted throughout California, even in areas with a long history of grazing. In addition to burning the non-native ryegrass and seeding the native brome, ecologists think that mechanical treatment will also be needed to tilt the scales between ryegrass and brome. If the area is mowed after ryegrass undergoes new growth, but before it goes to seed, it will reduce competition for brome. Because the brome is a perennial, it will resprout after mowing, but the ryegrass will not. Repeated mowing in combination with burning is likely to help increase the proportion of native grass on the site. This is a valuable objective, and we would encourage the park to continue and expand this native prairie and grassland restoration project across the Pastoral Zone. We would be more than happy to cooperate with NPS in this endeavor in the future. We are in contact with a large network of Bay Area native plant restoration groups that are willing to provide expertise and volunteer time, in exchange for increased conservation measures on these rare public lands. Conclusion

WWP supports managing the Seashore and GGNRA for their irreplaceable scenic and wildlife values. In 1970, Rep. Jeffery Cohelan (D Calif.), cosponsor of the 1962 legislation authorizing the Point Reyes National Seashore, emphasized in a Congressional hearing that of some 60,000 miles of shoreline in the continental United States, less than two percent is publicly owned. Point Reyes would add 45 miles of coastline to the public trust. Full public access and realization of recreational and interpretive values should be managed for in these park units. William F. Ryan (D N.Y.) in 1970, stated of Point Reyes National Seashore: Congress must neither countenance nor sanction the carving out of enclaves of private privilege within the National Park System.

We recommend terminating the grazing leases once and for all. We advise NPS to choose Alternative F, or our own proposed alternative of No Ranching and Coastal Prairie Restoration, inside these beautiful and popular national park units. The 24 ranching operations are authorized for beef and dairy ranching under lease/permits which include terms and conditions for the protection of natural and cultural resources, according to the park. In our field observations the Pastoral Zone is not meeting sustainable and healthy ecological conditions for Threatened and Endangered species, rare plants, sensitive native plant communities, and biodiversity.

At the very least, within the NPS proposed Conservation Framework, all Range LMUs should have no livestock grazing and a program of active coastal prairie restoration undertaken over time. These areas can also benefit from visitor trails and interpretation. These Range areas should be permanently closed to all livestock grazing and placed into conservation and native plant restoration zones, with tule elk management.

Otherwise, we fully support a No Ranching Alternative for the entire park. NPS has the opportunity to create a vignette of primitive America in these park units, the best objective of every national park. We again quote the Organic Act: &to promote and regulate the use of the . . . national parks . . . 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. -The National Park Service Organic Act (16 USC 1)

Thank you for considering these comments. Western Watersheds Project thanks you for this opportunity to assist the National Park Service by providing scoping comments for this important General Management Plan

Amendment and EIS. Please keep Western Watersheds Project informed of all further substantive stages in this and related NEPA processes and documents by contacting me at

Sincerely, Laura Cunningham California Director Western Watersheds Project

Erik Molvar Executive Director Western Watersheds Project

Michael J. Connor, Ph.D. Western Watersheds Project member

Karen Klitz Western Watersheds Project member

Denise Boggs Executive Director Conservation Congress

George Nickas Executive Director Wilderness Watch

Ara Marderosian Sequoia ForestKeeper

References

- Anderson, R. S., A. Ejarque, P. M. Brown, and D. J. Hallett. 2013. Holocene and historical vegetation change and fire history on the north-central coast of California, USA. *The Holocene* 23(12) 1797-1810. Bartuszevige, A. M. and Endress, B. A. 2008. Do ungulates facilitate native and exotic plant spread? Seed dispersal by cattle, elk and deer in northeastern Oregon. *Journal of Arid Environments*, 72: 904-913. Cobb, M.A. 2010. Spatial Ecology and Population Dynamics of Tule Elk (*Cervus elaphus nannodes*) at Point Reyes National Seashore, California. PhD Diss., Univ. of California, Berkeley, 202 pp. Cole, David, Ed Zahniser, Doug Scott, Roger Kaye, George Nickas, and Kevin Proescholdt. 2015. The Definition of Wilderness Character in Keeping It Wild Jeopardizes the Wildness of Wilderness: A critique of the interagency strategy to monitor trends in wilderness character. Available online at <https://wildernesswatch.org/images/pdf/2016-Wilderness-Character-KIW2.pdf>. Congressional Research Service. 2016. Grazing Fees: Overview and Issues. September 29, 2016. Coyne, M.S., R.A. Gilfillen, R.W. Rhodes, and R.L. Blevins. 1995. Soil and fecal coliform trappings by grass filter strips during simulated rain. *J. Soil Water Conserv.* 50: 405-408. Ferry, D., and C. LaFayette. 1997. Point Reyes National Seashore Visitor Use Survey. Sonoma State Univ., 59 pp. Freilich, J. E., J. J. Duda, J. M. Emlen, and D. C. Freeman. 2009. Ecological effects of ranching: A six-point critique. *Bioscience* January 2009. Frisina, M. R. 1992. Elk habitat use within a rest-rotation grazing system. *Rangelands* 14(2). Gogan, P.J.P. 1986. Ecology of the tule elk range, Point Reyes National Seashore. PhD. Diss., Univ. of California, Berkeley. Gogan, P.J.P., and R.H. Barrett. 1986. Tule Elk at Point Reyes National Seashore. Pp. 32-81 in Proc. Of the Conf. on Science in the National Parks, Fort Collins, CO, July 13-18, 1986. Gogan, P.J.P., D.A. Jessup, and R.H. Barrett. 1988. Antler anomalies in tule elk. *J. Wildl. Dis.* 24: 656-662. Gogan, P.J.P., D.A. Jessup, and M. Akeson. 1989. Copper deficiency in tule elk at Point Reyes, California. *J. Range Manage.* 42: 233-238. Guber, A. K., Shelton, D. R., Pachepsky, Y. A., Sadeghi, A. M., & Sikora, L. J. 2006. Rainfall-induced release of fecal coliforms and other manure constituents: comparison and modeling. *Applied and environmental microbiology*, 72 (12), 7531-9.
- Jepson, Willis L. 1901. A Flora of Western Middle California. Encina Publishing Company: Berkeley, CA.
- Johnson, B. E. and Cushman, J. H. 2007. Influence of a Large Herbivore Reintroduction on Plant Invasions and Community Composition in a California Grassland. *Conservation Biology*, 21: 515-526. doi:10.1111/j.1523-1739.2006.00610.x
- Kratville, S. P. 1989. Elk habitat selection, distribution, and nutrition as influenced by cattle in east-central Idaho. Launer, A.E., D.D. Murphy, J.M. Hoekstra, and H.R. Sparrow. 1992. The endangered Myrtle's silverspot butterfly: present status and initial conservation planning. *J. of Res. Lep.* 31 (1-2): 132-146. McCullough, D. R. 1969. The Tule Elk-its History, Behavior, and Ecology. *Univ. California Publ. Zool.*, 88. McCullough, D.R., R.A. Garrot, J.F. Kirkpatrick, E.D. Ploka, K.D. Ralls, and E.T. Thorne. 1993. Report of the Scientific Advisory Panel on control of

tule elk on Point Reyes National Seashore. Final Report, October 18, 1993, 39 pp. McNees, A. L., D. Markesich, N. R. Zayyani, and D. Y. Graham. 2016. Mycobacterium paratuberculosis as a cause of Crohn's disease, Expert Rev. Gastroenterol. Hepatol. 2015, 9(12): 1523-1534.

Munz, P. A. and D. D. Keck. 1963. A California Flora. University of California Press: Berkeley. National Marine Fisheries Service (NMFS). 2004. Biological Opinion: The Continued Issuance of Grazing leases at Point Reyes National Seashore and the Golden Gate National Recreation Area in Marin County, California. National Park Service (NPS). 1998. Point Reyes National Seashore Tule Elk Management Plan and Environmental Assessment. NPS. 2006. Management Policies 2006. United States Department of the Interior, National Park Service. August. 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. Ryan, A., and L. Parsons. 2015. Improving habitat management for Sonoma alopecurus: Developing the Optimal grazing regime. National Park Service, unpubl. rep., Grant Project: MO #4500035592; NPS Agreement #G8530120004, 17 pp. USFWS. 2002. Formal Consultation on the Grazing Permit Renewal Program, Point Reyes National Seashore and the Golden Gate National Recreation Area, Marin County, California. Watson, Sereno. 1880. Botany of California, Vol. II. Little, Brown, & Co.: Boston. Watt, L.A. 2015. The Continuously Managed Wild: Tule Elk at Point Reyes National Seashore. J. Intl. Wildl. Law and Policy 18: 289-308.

#1181

Name: rubenstein, ann

Correspondence: Please limit mechanical exposure to the pristine trails at Pt Reyes National Seashore. Leave this natural and recreational area as is for equestrians and hikers to enjoy without the intrusion of bicycles on the narrow, winding, pristine trails we now enjoy. Thank you. Ann

#1182

Name: ALAMEDA, LLOMA

Correspondence: I am in total agreement with this comment below, so feel it should be stated again and again and again.....

"In wildness is the preservation of the world." So said Henry David Thoreau over 160 years ago, and it is true and necessary to act on now more than ever. Congress authorized wilderness areas to be protected and preserved as naturally as possible, with no mechanized incursions. The National Park Service is entrusted with this mission. I am opposed to allowing bicycles to be used in wilderness areas in any National Park Service unit. In Marin County, including Point Reyes National Seashore, bicyclists already have access to 75% of the area trails. Day hikers, backpackers, and horse riders are looking for a quiet nature experience on the spectacular, mystical trails of Point Reyes National Seashore. This type of experience is getting harder and harder to find in our busy world and should be all the more protected from interest group pressures. Please do not cave in to pressure from the bicycle lobby. They will always want more and more and will never be satisfied. All we want is to keep the wilderness as natural as possible, with access to the natural beauty of Point Reyes' trails on foot, whether hiking boot or hoof, as it has always been and as Congress intended.

#1183

Name: Monson, Alexandra

Correspondence: November 30, 2018

Office of the Superintendent Point Reyes National Seashore 1 Bear Valley Road Point Reyes Station, CA 94956

RE: Comments Regarding the 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 purpose, need, preliminary alternatives, and other issues associated with development of the 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 Service's (NPS) efforts to prepare an EIS and to consider alternatives that include reducing or eliminating ranching. However, there are several considerations lacking in the Notice of Intent (NOI) that need to be adequately addressed in the EIS. ALDF also adopts and incorporates by reference the points raised by the Center for Biological Diversity in their comment submitted concurrently.

Specifically, the NOI fails to prioritize the guiding principle in the NPS Organic Act to "leave [the scenery, natural and historic objects, and wildlife] 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.]" Additionally, the NOI proposes vague or overly broad actions that will need to be further defined and analyzed in order to prepare an adequate EIS.

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 (emphasis added). Further, NEPA requires that the agency "[r]igorously explore and objectively evaluate all reasonable alternatives." *Id.* at § 1502.14 (emphasis added). Therefore, current scientific evidence regarding the environmental effects, both positive and negative, of all alternatives will need to be thoroughly discussed in the EIS.

I. The EIS Must Adequately Evaluate the Environmental Impacts of Ranching.

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). Therefore, the EIS must adequately evaluate and compare the environmental impacts, both positive and negative, of each proposed alternative.

The "NPS proposed action" and all but one of the alternatives listed in the NOI include ranching operations. The EIS must provide current scientific evidence regarding the negative environmental impacts due to current ranching operations and how any continued ranching operations or diversified ranching operations will negatively impact the environment.

As Center for Biological Diversity pointed out in their comments submitted concurrently, 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.

In addition to threatened water quality, ranching also significantly contributes to global warming, degradation of habitat conditions and threats to threatened or endangered species, coastal erosion, and impaired recreational opportunities and aesthetic interests. See Complaint at 19, *Resource Renewal Institute v. National Park Service* (N.D. Cal. 2016) (Case 4:16-cv-00688). The EIS must recognize these negative environmental impacts and compare them to the impacts of other possible uses of the land. Failing to address the impacts on threatened and endangered species would violate not only NEPA but the Endangered Species Act, as well.

The NPS proposed action, Alternative B, allows for “ranch operational flexibility and diversification[.]” The 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.

II. The EIS Must Adequately Evaluate the Environmental Impacts of Elk Herd Management.

The EIS must adequately evaluate the positive impacts of the tule elk to the environment and the negative impacts of the proposed 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 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 strongly encourages 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.” 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 do not bear out. Indeed, lethal management actions actually harm, rather than protect, Point Reyes National Seashore’s valuable natural resources and environment. The EIS must recognize the relative cost effectiveness of the non-lethal alternatives compared to the proposed lethal methods.

III. More Clarification is Needed Regarding Proposed Actions

The NOI vaguely or over broadly proposes a variety of possible actions. These proposed actions need to be more clearly defined and analyzed in the EIS. For example:

1. Alternative B allows 20-year terms for agricultural leases/permits. How was 20 years chosen? Will NPS be able to modify these leases/permits with the changing needs of the National Seashore during those 20-year terms? How will that impact the environment?
2. Alternative D reduces the land used for ranching by 7,500 acres. How was that quantity chosen? Were other quantities evaluated? What specific 7,500 acres will ranching cease on? How will this impact the environment? Why is ranching being reduced in terms of acres and not number of animals (which would be more indicative of potential environmental effects from, inter alia, waste volume and management)?

3. Alternative E ceases the operation of six dairy operations but allows them to be converted into beef cattle grazing operations. How will this impact the environment? How does this use of the land compare to other possible uses of the land?

4. Alternative F allows for prescriptive grazing. What is “prescriptive grazing”? When will it be allowed? How will it be managed to ensure the minimum amount of negative impacts on the environment? Is it necessary?

* * *

In conclusion, we appreciate the opportunity to provide comments and urge you to consider these comments and the scientific evidence when preparing the EIS. Please contact us with any questions or concerns.

Sincerely, /s/ Alexandra Monson

Alexandra Monson, Legal Fellow Cristina Stella, Staff Attorney Animal Legal Defense Fund
#1184

Name: Elliott, Ann & Woody

Correspondence: Comments on PRNS General Plan Amendment for Pastoral Zone. By: Ann & Woody Elliott
The EIS should show why the chosen alternative is the best option for preserving and enhancing the natural biodiversity of plants and animals at the Seashore and is the most effective alternative for conserving and restoring its natural and cultural resources. Impact topics need to include sensitive plants and plant communities listed by the State of California, Federal Government and California Native Plant Society (beyond those federally listed).

Comments on dairy and beef ranching and alternatives that include them (Alternatives A-E): - The EIS should evaluate whether dairy ranching is environmentally and economically sustainable in West Marin. - The EIS should evaluate if the conversion of all ranches to beef cattle operations (Alternative E) would be more environmentally and economically sustainable and have fewer impacts on sensitive resources including Tule Elk. - Ranching is a marginal business everywhere. The EIS should evaluate whether or not NPS subsidizes or otherwise accommodates these industries as they now exist and in the future with the likelihood of these industries becoming less environmentally and economically sustainable. - Dairy ranching has changed tremendously from historic times. The EIS should explore why the Seashore should accommodate these modern changes. The historic dairies had close to 100 cows each mainly producing milk December through August. Now herd sizes are two to three times larger producing milk year round with automatic milking machines. - If modern dairy ranching is accommodated, then all dairy and beef ranches should be encouraged to use the latest Best Management Practices (BMP) that reduce their impact on natural resources. - An additional alternative to evaluate is the reduction of cattle density calculated per Animal Unit Month (AUM) or dairy herd size on each ranch to conserve the natural resources (land, air & water) and to accommodate the growing Tule Elk herds. This might be easier, less expensive, and better ecologically than trying to reduce Tule Elk herd size. Reduced lease payments would compensate ranchers for reduced AUM and dairy herd size. - USDA organic dairy requirements of a minimum 120 days per year on pasture with a minimum of 30% of a ruminants dry matter intake (DMI) on average over the course of the grazing season (designed for a climate with year-round rainfall, not a Mediterranean climate with summer and fall drought) may pressure dairy farmers to overgraze their lands or request more conversion of their leased rangeland to pasture and silage to provide feed during the dry season. Reduction in area of natural range should not be allowed. Reduction of dairy herd size should be the means for meeting the criteria of minimum free range days for organic certification. - Qualitative observations of dairies in other parts of Marin and Sonoma Counties compared to Seashore dairies indicates severe overgrazing in many of the Seashores range and pastures. Some of these Seashore lands comprising mostly old sand dunes may not be able to sustain the level of grazing of other soils. Instead of having blanket Residual Dry Matter (RDM) for the Seashore, RDM minimums should be set for each soil and resulting vegetation type. - The EIS should assess the role of pasture creation/type conversion in the destruction of specific native plant species and communities. Pastures are contrary to preservation of native plant diversity. The EIS should set forth the Seashores mitigation processes for the habitat acreage altered since NPS purchase of these lands (refer to early vegetation maps and aerial photos). The EIS should address effects on soil, erosion, water quality, and wildlife habitat; promotion and spread of weedy species (e.g., thistles); support for

control of problem animals (ground squirrels, ravens [which may predate on endangered snowy plover]). The EIS should address the negative effects of spreading solid and liquid manure on NPS lands which negatively impacts biodiversity and aesthetics with alternatives to this process. - Dairy ranching and other agriculture on the Point Reyes Peninsula grew as a result of Tule Elk being extirpated from the area. The EIS should address this and justify why the numbers of reintroduced Tule Elk should again be reduced to allow this more recent land use to thrive. Economic compensation to lessees through reduced cost of their leases could be made for use of their leased lands by Tule Elk. - Criteria for succession of ranch operators and choosing of subsequent lessees should be clearly defined. - Lessees should: ~ Acknowledge their unusual good fortune of being able to lease and care take land that belongs to all Americans. ~ Acknowledge all aspects of the NPS Organic act (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). ~ Acknowledge that they are stewards of the land, not there to mine the lands resources, and should strive to use BMPs. ~ Accept that public visitation can happen that is respectful of their privacy and continued ranching operations. - Leases and accompanying Ranch Management Plans should clearly state NPS expectations of leasees and avenues of cooperation. - The EIS should state what efforts will be made toward cooperation with ranchers to improve their attitudes toward visitors and staff of the Seashore. - Specific BMPs for land, air, water, plant, animal, and cultural resources should be developed and catalogued. - The EIS should evaluate and allocate to leasees and / or NPS the cost of BMP development, as well as the cost of their implementation, monitoring and periodic reporting. Incentives for using enhanced BMPs and consequences for not reaching BMP goals should be outlined in the EIS and detailed in each ranch lease and Ranch Management Plan. - NPS should allocate staff resources toward development of and evaluation of adherence to Ranch Management Plans. - Fees from leases should at least cover and be allocated to the above costs for NPS staff and mitigation, monitoring and reporting requirements included in Ranch Management Plans. - NPS should be actively engaged with ranches in developing adaptive resource management practices that implement the Ranch Management Plans. - Leases should clearly define responsibilities for maintenance of ranch structures (historic and modern) by NPS and/or lessees. - Leases should address best routes and methods for allowing public access to leased rangelands.

Comments specific to the Conservation Framework to be used with all ranching Alternatives (A - E): - The EIS should include clear definition of the resource protection buffers, their locations, and the responsibility roles and planned management of them. - The Range Land Management Unit (LMU) should not be limited to the stated nearly 70% of the planning area to accommodate all sensitive species and plant communities that should be restored to areas denuded since purchase of the Seashore. - Sensitive, threatened, and endangered species plus sensitive plant communities ranked by the Calif. Native Plant Society and State of Californias Vegetative Classification and Mapping Program (VegCAMP) should be identifiers of Range LMU or excluded from ranching and included in resource protection buffers.

Comments specific to rare plant species and communities, past and present: - The EIS should provide a detailed inventory with accompanying maps of the current locations and population sizes of sensitive plants and plant communities listed by the State of California, Federal Government and California Native Plant Society, including coastal bluffs, coastal prairie, coastal scrub, and paleodunes. Only with this information can park planners and the public gauge how the proposed alternatives will protect these resources and enhance biodiversity. - The EIS should review historic vegetation mapping and surveys. A vegetation type map done of the Seashore in the 1970s by interpreting USGS black & white orthophoto quadrangles would be a useful baseline. This was done by University of California Berkeley, Remote Sensing Lab commissioned by the Seashore Research Biologist Richard Brown. Also, permanently established transects were sampled and photographed by NPS in 1967, 1971 and 1975 on seven ranches within the Pastoral Zone (Kehoe, McClure, RCA, North Beach, Heims, Spaletta, George Nunes) plus eight other locations throughout the Seashore. These data would help to describe the species composition of vegetation types that covered the Pastoral Zone 50 years ago (purchase time). - These historic sources should be reviewed together with current vegetation mapping and recent rare plant surveys done by the Seashore to identify areas to be protected and restored. - The role of grazing in the Pastoral Zone should be assessed in promoting or degrading biodiversity, native plant species, and communities. - Vegetative type conversion to pasture since purchase by the Seashore should be quantified. - Restoration of sensitive plant communities, e.g. coastal prairie

and coastal scrub, that have been type-converted to pasture and silage fields since acquisition by the Seashore, should be done to increase biodiversity.

Comments regarding visitor experience: Enhanced visitor access to rangelands and nearby coastlines should be emphasized. More loop trails would add interest to visitors. Specifically a loop option for the Estero Trail back through Home Ranch would allow visitors to cross a wider variety of habitats.

#1185

Name: Marvel, Jonathan

Correspondence: I am strongly in favor of Alternative F the no ranching alternative.

I am submitting the same comments (see below) I did last year as they remain germane for the EIS process especially in regard to the need for the Park Service to provide a thorough analysis of the current status of all aspects of ecological health in Pt. Reyes NS and the Golden Gate NRA. That presentation of the current management situation needs to provide information on the negative impacts on native ecosystems including the Tule elk of the currently authorized livestock grazing and dairying activities. Included must be a full assessment of livestock impacts on water quality, native plants, ecological succession and native fish and wildlife.

The EIS process must also carry out a thorough analysis of the environmental impacts of each alternative as well as modeling of those impacts in relation to expected climate changes caused by anthropogenic impacts on the atmosphere and the oceans.

Included below are my comments from November 2017, please incorporate them into this scoping process along with the above comments. Thanks for the opportunity to comment and please keep me on your emailing list for this EIS process.

Jon Marvel

As part of the development of the Environmental Impact Statement (EIS) the General Management Plan Amendment for the Pt. Reyes National Seashore and the Golden Gate National Recreation Area, the National Park Service (NPS) needs to provide a complete inventory and assessment of current conditions on the 28,000-acre project area. For example: 1. The NPS must provide a full assessment of the current impacts of all agricultural activities on other values including but not limited to existing fencing, surface water quality, ground water quality, all soils conditions, soil erosion and compaction, air quality, impacts to native plants and plant communities, impacts to native wildlife (including but not limited to Tule elk) and wildlife habitat, impacts to estuarine and ocean conditions caused by surface water run-off from agricultural fields and all other agricultural activities and impacts on recreational activities that may be thwarted or limited by authorized agricultural activities. 2. The NPS must provide all current written terms and conditions under which all project area authorized agricultural activities take place including any and all monitoring information on livestock ranching and dairying in the project area held by NPS and/or any other federal agency that describe whether agricultural activities are in compliance with current authorizations or not. For example, what do agricultural permittees pay the NPS for their leases? Are they responsible for 100% of maintenance on buildings or other ranching or dairying infrastructure like fencing, cattle guards, manure pits, dead animal disposal etc.? What consequences exist for non-compliance with existing lease terms and conditions, and have any penalties or other consequences ever been imposed? The provision of this and other information on current conditions will enable a much better analysis of the impacts on these values of each alternative to be assessed in the EIS especially if any alternative includes expanding the kinds of agricultural activities that could be authorized by NPS in the project area. The NPS needs to assess as part of the EIS another reasonable alternative that would end all livestock ranching and dairying on the project area. Such an alternative will be useful to have in order to compare to the impacts of each proposed alternative that maintains or expands agricultural activities and may also be shown to be the most environmentally desirable alternative. All alternatives analyzed in the EIS that propose to authorize any level of agricultural activities need to provide the written terms and conditions that will be required by the NPS for that activity to take place. For example what

protections will be included as leaseholder terms and conditions to protect legally protected objects of the National Seashore and the National Recreation Area including native and non-native plant communities, water quality (both ground and surface), air quality, soils, micro fauna and flora including fungi and lichens and the visual and

sound experiences of visitors, estuarine conditions, wildlife and wildlife habitat and recreational activities. Presumably the NPS does not just give potential agricultural leaseholders a lease without any terms and conditions at all! Please keep me on the email list for all publications and opportunities for public involvement as this analysis process moves forward.

#1186

Name: Maurice, Vaughn

Correspondence: November 30, 2018

Superintendent Point Reyes National Seashore 1 Bear Valley Road Point Reyes Station, CA 94956

RE: Comments on General Management Plan Amendment 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 more than 50,000 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 for the Point Reyes National Seashore (PRNS).

PRNS is currently home to badgers, bobcats, coyotes, burrowing owls and other predators. Tule elk, songbirds and ground-nesting birds, gophers, snakes, insects and many other animals also call PRNS home. These public lands are hunting and feeding grounds for hawks, falcons, barn owls, great horned owls, great blue herons, egrets, western bluebirds, warblers and many other species of wildlife. The Park Service's Amendment to the General Management Plan should prioritize protecting these natural resources of PRNS.

Any cattle-ranching and other agricultural operations 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.

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 increase conflicts with wildlife, and degrade wildlife habitat and water quality.

We appreciate the opportunity to provide our comments on the General Management Plan Amendment and encourage the National Park Service to protect and preserve wildlife, including the free-roaming population of Tule Elk, as well as to have the insight to implement a humane, long-term and sustainable plan to mitigate any conflicts with wildlife, including the growing population of Tule elk-wherever they may roam.

Sincerely,

Vaughn Maurice Executive Director

#1187

Name: N/A, Tommy

Correspondence: I am writing to express support for improved trail access and connectivity for all trail users in the Pt. Reyes National Sea Shore, particularly mountain bikes. Although few new trails seem to be in the plans, any new trail access will help spread out the impact of mountain bikes, particularly from the most impacted areas (mostly on and around mt. tam with easy access from Mill Valley and Ross Valley/ Fairfax) and reduce the impact on individual trails. Additionally, mixed trails that incorporate fire roads and single track out to pt reyes will help keep some bikes off of the road way and allow better access between the few trails that already exist. As the numbers of visitors and trail users of all types seems to be increasing steadily, particularly on weekends, it is important that we strive to open more trails through out Marin that offer exciting and fun outdoor experiences and work together to maintain and share these resources. Thank you!

#1188

Name: Cook, Nathaniel

Correspondence: I support MCBC in it's efforts to ensure equal, safe access for all user groups including the under-represented biking user group for use on the trails in the Non-Wilderness areas of the Pt Reyes National Seashore. For far too long, this legitimate, growing user group has been excluded (and discriminated against by other groups) from access to these areas of Public Land! It's time to recognize that this land belongs to everyone and should be shared equally and fairly. Here is a list of the trails and projects that I support: A new trail between Devil's Gulch and Platform Bridge through the Cheda, McIsaac, and Zanardi Ranches. A plan to connect the Cross Marin Trail into Point Reyes. Adoption of social trails off Bolinas Ridge for better connectivity and a single-track trail experience. Extend the Olema Valley Trail to Bolinas on the east side of Highway 1. Close gaps for bikes through ranch lands in the park, including closing the Estero Trail loop, connecting Sir Francis Drake Blvd. with Pierce Point Road, and connecting Marshall Beach to Pierce Point Road, A more bike-friendly permit application process for road and mountain bike events in the park, including along Bolinas Ridge and out to the lighthouse. Bike access to all ranch roads in the pastoral zone that are already open to pedestrians.

#1189

Name: Norman, Jean

Correspondence: I am vehemently opposed to killing the Tule elk. It is a very unwise decision! Not environmentally sound. What s wrong with you people? Life is not all about money!

#1190

Name: O'Day, Sean

Correspondence: I have been a Marin resident and Mt biker since the early '90s. I appreciate this opportunity to improve my experience enjoying the natural wonders of Marin.

Please consider implementing the following:

A new trail between Devil's Gulch and Platform Bridge through the Cheda, McIsaac, and Zanardi Ranches.

A plan to connect the Cross Marin Trail into Point Reyes.

Adoption of social trails off Bolinas Ridge for better connectivity and a single-track trail experience.

Extend the Olema Valley Trail to Bolinas on the east side of Highway 1.

Close gaps for bikes through ranch lands in the park, including closing the Estero Trail loop, connecting Sir Francis Drake Blvd. with Pierce Point Road, and connecting Marshall Beach to Pierce Point Road,

A more bike-friendly permit application process for road and mountain bike events in the park, including along Bolinas Ridge and out to the lighthouse.

Bike access to all ranch roads in the pastoral zone that are already open to pedestrians.

Thanks, Sean O'Day

#1191

Name: Fehlman, Alison

Correspondence: Please no more bike trails in Pt Reyes. They make is dangerous for hikers and equestrians by wearing earphones and ignoring right of way. In addition they destroy the natural environment and erode the trails. Thank you

#1192

Name: Ghiselin, Jeff

Correspondence: Designate ALL trail mileage not in a Wilderness area as open to bicycles, horses and hikers.

#1193

Name: Hutchings, N/A

Correspondence: After riding the trails for 30 years I have seen numerous trails disappearing for equestrians. I have no problem sharing with bicyclists when it is safe to do so. With them having 75% of the trails I don't feel that it is unrealistic for there to be some trails where they are not allowed. There should be some trails where hikers and equestrians can walk and ride without fear of being run off the trail. There has to be some give and take from all, but it seems that the equestrian groups are always on the losing end. Please reconsider this issue and let the trails be as they were orginally designed. Sincerely I. Hutchings

#1194

Name: Baker, Teresa

Correspondence: It's a travesty that I'm even writing this email. Tule Elk are part of the landscape of Point Reyes. There must be another way to support ranchers, (who should have been removed long ago, that land belongs to ALL taxpayers, not the few who have claimed it for themselves, Grandfathered in or not.) and keep Tule Elk protected. This society has a history of killing off habitants of the land. May it end now.

Teresa Baker

#1195

Name: Shaffer, Carolyn

Correspondence: We come to Point Reyes every year with our horses we do not want to see bicycles on the trails as too many of them like to ride fast and the last thing we need is to get hurt because of a horse spooking from a bicycle we want the trails to be kept open and maintained as they have been and access from Stuart Ranch and Bear Valley

#1196

Name: WEST, KATHERINE

Correspondence: To Whom it May Concern- I just learned of the various proposals in this project plan and feel extremely strongly in my opinions as a scientist, ecologist and conservationist that the elk should be given all preference over the cattle. Please vote FOR Alternative E or F and AGAINST B, C, D which only harm the elk and other wildlife, besides having long-term negative impacts on climate change.

- 1) The Tule elk are a subspecies that is only found here in the PRNS and the only elk in California. They are in 2 small and sensitive populations and could easily be made extinct by narrowing the herds or reducing the herds to a single population.
- 2) A national park is for protecting and nurturing wild species, not giving it over to human activities that harm the wildlife.
- 3) If grazing is to be allowed in the NP, dairy farming should be eliminated and beef cattle numbers and range should be reduced in scope. We need to be developing less environmentally damaging food sources, not more.

Sincerely, Katherine West

#1197

Name: Harris, Kimberly

Correspondence: Good lord! Why do cattle take priority over native species? Cattle are ruining our ecosystem. Thin out the cattle, NOT the Tule Elk.

#1198

Name: Warnow, Zachary

Correspondence: Hi there,

As a father, hiker, environmentalist, and mountain biker, I'm writing with my strong support of Marin County Bicycle Coalition's and Access for Bikes' advocacy positions on opening more trails in Pt. Reyes National Seashore to bicycles. As the sport of mountain biking continues to grow, it's proven to be a great way for people of all ages, fitness levels, and ability levels to enjoy the outdoors and our national treasures, like the PRNS. We need to increase trail access to support the needs of this growing user group. I particular, I support the following improvements.

Sincerely, - Zachary Warnow

A new trail between Devils Gulch and Platform Bridge through the Cheda, McIsaac, and Zanardi Ranches.

A plan to connect the Cross Marin Trail into Point Reyes.

Adoption of social trails off Bolinas Ridge for better connectivity and a single-track trail experience.

Extend the Olema Valley Trail to Bolinas on the east side of Highway 1.

Close gaps for bikes through ranch lands in the park, including closing the Estero Trail loop, connecting Sir Francis Drake Blvd. with Pierce Point Road, and connecting Marshall Beach to Pierce Point Road,

A more bike-friendly permit application process for road and mountain bike events in the park, including along Bolinas Ridge and out to the lighthouse.

Bike access to all ranch roads in the pastoral zone that are already open to pedestrians.

#1199

Name: Flett, Mary Anne

Correspondence: MARY ANNE FLETT CONSULTING WILDLIFE BIOLOGIST

To: National Park Service Cc: Dianne Feinstein, Kamala Harris, Jared Huffman Date: 28 November 2018 RE: Point Reyes National Seashore General Management Plan: 2017-10 GMP Amendment Public Comment

I am submitting these comments from my perspective as a professional wildlife biologist; I have worked for more than 40 years in my field. During the past two decades I have been working extensively within the Point Reyes National Seashore and the Golden Gate Recreation Area. I conducted research for the California Department of Fish and Wildlife and the U.S. Forest Service and published peer-reviewed articles on an endangered bird species in the Sierra Nevada, which specifically addressed livestock grazing and meadow management in conjunction with alternative grazing practices/strategies. Personally, I have been visiting the Seashore since 1978 and have lived in Point Reyes Station for 22 years. I am a bird-watcher, kayaker, and hiker and am deeply familiar with, and concerned about, the well-being of the Golden Gate National Recreation Area and the Point Reyes National Seashore.

The following comments are mostly relevant to the Point Reyes National Seashore. I am not commenting in support of any one of the alternatives outlined in the General Management Plan Amendment (GMP). The best alternative is one that protects, preserves, and enhances the native habitats, wildlife, and plant species that occur within the parks and is in accord with the National Park Mission Statement which says, "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 enabling legislation for creating the Point Reyes National Seashore says, "...the property acquired by the Secretary... 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..." I am advocating for selecting whatever alternative best protects the natural environment and the native animal and plant life within it.

Rep. Jared Huffman and Rep. Robert Bishop recently co-sponsored a bill (HR 6687), to grant 20-year permanent leases for ranches in the Seashore and calling for "removal" of the native Tule Elk. This bill was passed in the House without any public input and it was seemingly rushed through prior to the NEPA process/Environmental Impact Statement that is required by law. I have already written to Representative Huffman expressing my disapproval of this bill. One of the bill's major faults is that doesn't specifically give the National Parks power or leverage to hold ranchers responsible for poor land and livestock management practices.

Huffman and Bishop's bill also calls for "removal" of native Tule Elk. The reintroduction of the elk into the Seashore has been very successful. Large contributions of public funds and resources have been devoted to the project. It would be irresponsible and wrong for the Park to now remove the Tule Elk. The National Park Service should not be swayed by the profit-driven interests of local ranchers who complain that the elk damage fences and compete with their cattle for forage. The National Park Service must abide by its Mission Statement and the enabling legislation for Point Reyes National Seashore and not yield to political pressure from private, commercial interests operating within our public lands.

Point Reyes National Seashore supports and provides habitat for numerous wildlife species, including more than 30 that are protected due to their status as endangered, threatened, or as species of special concern. Measures must be taken to protect and preserve all native wildlife (not just Tule Elk) and native habitats. Measures that should be specifically addressed in the GMP and implemented on ranches in the National Park, include the following:

- Ranches must be required to abide by the federal Migratory Bird Treaty Act in all aspects of operations; the park service should enforce this law in order to prevent impacts to nesting birds on ranches. For example, the current practice of growing silage (thus creating "ecological traps") and then mowing/harvesting that silage during nesting season must end.
- Biomass standards should be reassessed to ensure that a substantial amount is retained throughout the year in order to prevent the extremely over-grazed conditions that currently exist on several of the ranches including (but not limited to) Ranches #2 and #3 and the Kehoe Ranch (#12?). Retaining a greater amount of biomass would enhance habitat, contribute to the complexity of the food chain, and create better habitat and foraging opportunities for raptors and other wildlife species.
- Re-assess current livestock stocking rates to find an optimum number of cattle for each allotment and do not allow the lessee to exceed the number permitted.
- Assure complete protection of native predators such as Bobcats, Mountain Lions, Coyotes and American Badgers.
- Ensure that livestock are excluded with at least a 100-meter buffer from sensitive, valuable wildlife habitats including riparian, wetlands of all types, coastal scrub, as well as vegetative communities that support rare plants. Hold ranchers accountable with consequences for poorly maintained fences that allow cattle to repeatedly trespass in sensitive habitats such as the Abbott's Lagoon area (Ranch #10 or #11(?)).
- Work to eliminate or minimize the odor of manure that is currently prevalent on some of the ranches. The current levels negatively impact visitor experience due to the nearly overwhelming stench; the ground is literally completely covered in manure in some locations.
- Consider and address the effects of ranching on climate change, including production of methane and other greenhouse gas emissions by livestock as well as the carbon footprint created by transporting supplies and ranch products in and out of the Point Reyes Peninsula.
- Assure that runoff from ranches isn't adversely impacting water quality downstream.
- Disallow conversions of ranch/Park land to row crops or other intensive agricultural practices.
- Allow some leases to expire by attrition and manage the habitat (currently estimated as 7500 acres) for the benefit of wildlife.
- Provide ample funding and support for controlling invasive plants on ranch lands (where ranching practices have caused the demise of native vegetation) and elsewhere in the park.
- Fund control measures to remove (or limit the number of) invasive wildlife species that are subsidized by disturbance associated with ranching activities, including feeding of feral and outdoor domestic cats (particularly at Ranch 1) and bird species such as Common Ravens, American Crows, and Brown-headed Cowbirds.
- Award leases for ranching on parkland on a competitive (not monetary) basis, e.g., base them on merit, innovation, park management goals, etc. Ideally this would allow for new ideas about ways to implement sustainable ranch practices.
- Include standards for wildlife protection and best land stewardship practices in all leases. Regular review of how the ranches are meeting wildlife protections would further legitimize regular Park oversight and provide an opportunity for park service resource managers to work with ranchers to adjust management practices to benefit wildlife and native habitat on ranches.
- The Park Service should be required and empowered to hold ranchers accountable for protecting the land in a way that benefits native wildlife, habitat, and plant communities.

Visitor access to parklands is important but I urge NPS to preserve the rural nature of the park rather than developing and building more visitor centers and interpretive facilities in place of ranches if/where leases have been allowed to expire.

The land should be managed in a way that best complies with the Park's Mission Statement and Point Reyes National Seashore's enabling legislation. The public owns the property that the ranchers are using, and the ranchers profit privately from it. If the chosen alternative in the GMP allows ranching to continue in the National Parks, the Park should be given financial and political support and authority to hold ranchers to the goals of preserving and protecting the ecological value of our public lands.

Please respect the integrity of the planning processes and work towards adopting a GMP alternative that protects and preserves native wildlife and biological diversity and maintains the natural beauty of Point Reyes National Seashore.

Thank you for considering my comments.

Mary Anne Flett

USFWS Threatened and Endangered Species permit #TE-233373-1.1 CDFW Scientific Collecting Permit and MOU #SC7407

#1200

Name: Winter, Marjorie

Correspondence: I think that national parks should NOT be open to private farming. We have plenty of farmland in this country....and certainly enough dairy farms. National Park open space is, however, in shorter supply. Point Reyes National Seashore is a treasure which should, indeed, be open to animals....wild animals, not cows. The dairies currently on park property are not a benefit to the nation, nor to park visitors...they only benefit the farm tenants. Cattle are a major source of pollution in Tomales Bay.

In addition, it is also clear that some farming practices conducted in the park are cruel to animals. The tiny cages in which calves are kept after separation from their mothers are appalling. These poor calves are separated from the herd and have no space in which to run around. What a shocking situation for the treatment of animals in a national park!

The EIS should identify and assess the environmental benefits of removing of commercial farming from the park. As citizens, this is our park and decisions about land use should be for OUR benefit and for the benefit of the wild creatures inhabiting the park.

#1201

Name: Sorgen, Gary

Correspondence: I went to the public meeting at the bay model to learn what I could. I was most interested in what the park service was going to do for the betterment of the park. What I found was the they had proposals for the ranches and to be determined for the park environment, which seems just the opposite of what it should be. That is one should say what the options are for the park enhancement, and that would determine what happens to the ranches. Representative Jared Huffman is trying to tell you that the ranches come first then the park. I will work to see that Rep. Huffman is serving his last term in office.

So, I think what you should be doing is doing an environmental impact on your various options, and see what to do then. I am particularly worried about water quality around Drakes estero. All I saw about the environment was that the Park service would worked with the ranches. If the ranches have to be preserved as working ranches, then the Park's environment will take a back seat. I think this would lead to degradation of the National Park and lawsuits.

As far as managing the Tule Elk, my preference would be let nature handle the numbers as in the north elk reserve. I also understand this is not an viable option with elk on ranch lands. I have no problem culling the heard by rangers.

Pulling for the Park Service to do what they think is right and not what is politically correct.

#1202

Name: Thacher, Thomas

Correspondence: access for bikes and mountain biking is very important to my family. It's one of the few activities that gets our entire family outdoors together. Please help us.

#1203

Name: Lewis, David

Correspondence: 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_{2e}) 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 Agriculture's 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. California's annual grasslands are one of the world's 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. California's 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 California's 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 reduce 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 extinction 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

#1204

Name: Booth, Claudia

Correspondence: I horse camp there at Stewart Ranch regularly and use the trails around Pt.Reyes. The yellowjacket nests and nettle are a real concern for equestrians, but we most of the time manage them. We manage by not getting off the trail! Due to those two dangers, many parts of those trails are already difficult when other riders meet going two different directions and you must get off the trail; or when a hiker needs to get off the trail to allow the horses by. I always stop and check for the nettles and any nest markers before I take my horse off to the side to allow others to pass me by.

If we share these trails, as they are, with cyclists, the yellowjacket nests and nettles become a real threat because in past experiences with sharing trails with cyclists, is that my horse and I must exit off the trail quickly to avoid a crash and that would leave me no time to check for nests and nettles.

Another note, is that many of those trails are narrow as it is and there is a lot of blind spots. Just getting past hikers in some spots presents high caution; I couldn't imagine trying to get past a cyclist, or have one whiz by me that has ignored the trail rules. Side note: I am not against bikes on trails, I ride many trails that I share with cyclist and have no problem because the trails allow the room and have few blind spots.

#1205

Name: Fishman, Richard

Correspondence: I am an avid cyclist and I am firmly and totally against your expanding bicycle access on trails in Point Reyes or any other park. I live almost across the street from another national seashore and its preservation and the preservation of all nature spaces is crucial to the survival of animals, humans plants and indeed the planet.

#1206

Name: N/A, N/A

Correspondence: No Ranching And Expansion Of Tule Elk In The Planning Area.

That is my desire and recommendation. We need MORE open land, not less. We do not need more beef or dairy land. Thank you!

Michael Herbick

#1207

Name: N/A, Eric

Correspondence: I think that national parks should NOT be open to private farming. * We have plenty of other farmland * Parks are a rarer resource * The farms are a source of pollutants We should protect our parks from the environmental damage of farming and open them up to the elk. Thank you

#1208

Name: Yavorsky, Donna

Correspondence: Visitors come to Point Reyes seeking a wild part of the coastline of California, in order to view wildlife, walk on sand beaches, and tour dramatic ocean cliffs unhindered by private property and development," said Erik Molvar, executive director of Western Watersheds Project. "They do not come here to see herds of cattle on overgrazed weed plots.

This idea of grazing cattle on public land is another sop that our esteemed president can offer to his cronies!

#1209

Name: Kennedy, Barbara

Correspondence: The Park Service needs to keep with its mission as steward of this national treasure and prioritize the protection of native wildlife at Point Reyes over agriculture and ranching. We have more than enough dairy products on the market to supply our needs at reasonable prices.

When Congress established Point Reyes National Seashore in 1962, it made it very clear that the continued operation of commercial ranching was temporary. Yet the Park Service's preferred alternative would extend cattle ranching leases for 20 years and evict tule elk from all lease areas - by either shooting elk or relocating them out of the park. This is outrageous.

The agency is also considering allowing ranchers to grow crops in the park and introduce new livestock animals such as chickens, goats and sheep. This could create even more conflicts with native wildlife and lead to persecution of birds and predators such as bobcats, foxes and coyotes. This is wrong on so many levels. I support the option to phase out dairy ranching in the park while allowing some beef ranching to continue. And importantly, I urge the Park Service not to remove or kill any elk.

#1210

Name: N/A, N/A

Correspondence: Times up equestrians! Share the wealth of trail access.

#1211

Name: Boyd, Sandra

Correspondence: As a Long time Equestrian rider and camper to Point Reyes National Park area. I like the trails to be closed to BICYCLES! In my experience the bike riders DO NOT take into consideration that horses are on the trail. They ride right up to you and are PISSED that they have to give the right away to the horse. Most have on Ear phones and have no idea we riders are there until it is to late.

My main concern is the safety of both riders, I would like there to be trails that are bike FREE, so that the equestrian rider may have a safe ride and not worry about some bicyclist coming around a corner at a high rate of speed. I myself have personally been confronted by several bike riders that were speeding on a trail and had to come to a skidding stop to avoid the horse.

Thank you for your consideration

Sandra Boyd

#1212

Name: N/A, Azpin

Correspondence: Public lands need to be managed for the long term best interest of the public so that they will be available for generations to come.

The need to graze cattle on public lands while it would directly effect some local ranchers is not necessary for the public food supply. Only a small fraction of the nations cattle are grazed on public land. They could all be removed with only minimal impact on the availability of beef at the market.

However while the impact on the food supply would be almost insignificant, the impact on the public lands would be huge. No degradation of lands, no pollution, no competition with wildlife, not to mention the enhanced experience of visitors to these lands. And no stepping in cow pies.

#1213

Name: Houlette, Gerald

Correspondence: I am writing to ask for more bike access on trails that support it and are safe for all users. I am asking for more single track access for bikes and more connectivity in these trails. I am also asking for trails that will help keep bikes off of unsafe roads.

I am also asking to remove horses from some of these trails. They do enormous amounts of damage and are not safe to be on single track trails .

Thank you for your time and consideration.

Gerald Houlette

#1214

Name: Walsh, Mark

Correspondence: I urge you to protect Tule Elk, other native wildlife, and wilderness and open lands at Point Reyes National Seashore - and to stop environmentally destructive and harmful ranching, grazing, dairy farming, and similar private commercial operations upon this rare and sensitive ecosystem. This is a United States National Park that belongs to everyone - it is NOT to be a CO2-generation BLM parcel or National Forest for the pleasure and profit of a small number of federally-subsidized entities with decades to plan ahead for lease expirations and operations removal established in the Congressional Act protecting this world treasure.

If a single oyster-farm can be singled out as destructive to the Seashore per Ken Salazar and federal agency practices and agents - then please explain how nearly 20,000 acres of more than 71,000 total acres (an astonishing 28%) of land and waterways can be used and despoiled by "historic ranching" and similar operations - and now be expanded or advanced for crass commercial priority at the cost to native wildlife and open space the Park Service is bound to protect as its own mandate?

Importantly, the National Park Service is actually proposing to kill off native wildlife to accommodate commercial ranching and farming operations at Point Reyes National Seashore! Are you kidding us? Look at yourselves in the mirror, and explain that to your kids and grandkids. We opted for cattle, cows, and grazing instead of wildlife and wilderness. What the hell kind of cattle and cows, not wildlife and wildlands precedent are you setting for every single inch across all National Parks? Did you hear about the federal climate change report that came out Thanksgiving Friday 11/23/18, emphasizing environmental impacts of humans and cattle (together now 90% of larger mammals on Earth), the massive die-offs of wildlife, and climate change forecasts? Or are elected officials too busy counting up private ranch and dairy campaign buyoffs, or agency personnel cringing from pressure of specialized interests who know their own deal making decades ago? An end-around by Jared Huffman to break the original mandate of the Park Service and terms of the original Congressional Act creating the Seashore is transparent and sickening.

Since ranching and dairy operations (not to mention proposed operations expansions to include chickens, goats, sheep, row crops, etc.!) along with the Park Service have done little to MOVE OPERATIONS OFF THE SEASHORE - then use this general management plan to finally put in place strict mechanisms to get these destructive and fouling eyesores moved out once and for all as was originally intended and mandated by the Congressional Act. This is a National Seashore - not multi-use BLM or National Forest lands! If nearby consumers, restaurants, and hotels want organic locally-grown products, they can be part of the solution, not the problem. Imagine THAT vista beauty and outdoor re-creating throughout Point Reyes National Seashore - not Point Reyes National Cow Pastures and Row Crops.

As it is, there are places on Point Reyes I will never visit or hike again, the cattle/cow excrement being so pervasive and poisonous, the stench so bad, and the wide-ranging damage to land and water so heartbreaking - especially in context of our worlds diminishing wildlife. And you want to kill or move wildlife as the solution? I mean, youre

the freaking National Park Service! Do I really have to explain this to you? What are you even thinking? Your mandate is clearly to serve the protection of natural lands, waters, wildlife, and habitat, not accommodate commercial operations and development like the BLM or National Forest Service.

I with many absolutely oppose any killing or removal of Tule Elk or other wildlife. And totally oppose "diversification" to allow ranchers or others to introduce new livestock or crops on Point Reyes National Seashore. This would be disastrous for the entire Park's wildlife and habitat. Please step back and look at what you're considering. Millions of people the world over DO NOT COME TO POINT REYES TO WONDER AT CATTLE, COWSHIT, CO2 GAS, CHICKEN MANURE, AND ROW CROPS!

I suggest adoption of Alternative E with amendment: immediately phase out dairy ranching within 5 years, and allow some beef ranching to extend for an additional temporary period of 5 years or less. No killing or removal of any Tule Elk or other wildlife ever. STOP cow-towing to ranch, dairy, beef, and other similar private commercial interests on National Park lands and waters!

The Park Service should also move quickly to plan and start sound restoration of all leased ranch, dairy, beef, and related commercial areas toward wildlife habitat and public access when private family and entity operations are removed or transplanted off Point Reyes, to BLM or National Forest lands if necessary through sound financial research and planning. In fact, remove the ranches and dairies off Point Reyes National Seashore - not the Tule Elk and other wildlife! Recover and restore the natural state of Point Reyes to something all beings can appreciate and love - leave it unimpaired for the enjoyment of future generations.

For the immediate present, we MUST ensure there's enough edible natural forage and clean unpolluted water for the Tule Elk to eat and drink - including removal of any human-made barriers to elk natural forage and fresh water to prevent more disastrous and cruel Tule Elk starve-offs that have occurred during recent seasons.

Be on the right side of history - do not expand cattle/ranching/dairy/crops operations and kill off native wildlife and destroy wild habitat! It is insane to do so! Step back! Get real! Use the opportunity to make a principled statement by doing the obvious right thing for our future generations and climate! Do NOT set dangerous precedent to follow for all our other National Parks, Seashores, and Monuments!

#1215

Name: Walters, Wendy

Correspondence: No legislation should dictate the removal or killing of a native wild animal to settle a conflict with cattle grazing in a National Park.

#1216

Name: Scarvie, Tom

Correspondence: I would like to request that bike access be strongly considered in the new plan, specifically to open up trail opportunities that focus on loop routes, connectivity with adjacent public lands, and facilitation of north-south connectivity across the landscape. I support Marin Country Bicycle Coalition's request for: - A new trail between Devil's Gulch and Platform Bridge through the Cheda, McIsaac, and Zanardi Ranches. - A plan to connect the Cross Marin Trail into Point Reyes. - Adoption of social trails off Bolinas Ridge for better connectivity and a single-track trail experience. - An extension of the Olema Valley Trail to Bolinas on the east side of Highway 1. - Gap closures for bikes through ranch lands in the park, including closing the Estero Trail loop, connecting Sir Francis Drake Blvd with Pierce Point Road, and connecting Marshall Beach to Pierce Point Road. - A more bike-friendly permit application process for road and mountain bike events in the park, including along Bolinas Ridge and out to the lighthouse. - Bike access to all ranch roads in the pastoral zone that are already open to pedestrians.

Thanks! Tom Scarvie

#1217

Name: Differding, Joan

Correspondence: National Park Service lands should prioritize supporting natural ecosystems and wildlife, not ranching or other agricultural activities. The statement that the Drakes Beach free-range tule elk herd would be managed at a level compatible with authorized ranching operations put the priority in the wrong place. The tule elk should be protected not "managed" to allow ranching to exist in the park.

#1218

Name: O'Hara, Janet

Correspondence: Please accept these comments from the San Francisco Bay Regional Water Quality Control Board. Thank you.

#1219

Name: Pinch, Adam

Correspondence: I'd like to suggest the following improvements and changes at Pt Reyes Natl Seashore to provide improved off-road biking opportunities.

A new trail between Devil's Gulch and Platform Bridge through the Cheda, McIsaac, and Zanardi Ranches.

A plan to connect the Cross Marin Trail into Point Reyes.

Adoption of social trails off Bolinas Ridge for better connectivity and a single-track trail experience.

Extend the Olema Valley Trail to Bolinas on the east side of Highway 1.

Close gaps for bikes through ranch lands in the park, including closing the Estero Trail loop, connecting Sir Francis Drake Blvd. with Pierce Point Road, and connecting Marshall Beach to Pierce Point Road,

A more bike-friendly permit application process for road and mountain bike events in the park, including along Bolinas Ridge and out to the lighthouse.

Bike access to all ranch roads in the pastoral zone that are already open to pedestrians.

#1220

Name: Putz, Charles

Correspondence: I write to oppose opening any trails narrower than fire roads in the Point Reyes National Seashore to bicycles and also to oppose allowing electric bicycles anywhere in Point Reyes National Seashore. The primary obligation of the National Park Service is to protect the integrity of the natural resource and the safety of visitors. Bicycles on trails narrower than fire roads pose an unreasonable risk of harm to pedestrians and equestrians, and damage to the environment. Electric bicycles should continue to be banned as "motorized vehicles". Today's electric bikes are easily modified to achieve power and speeds comparable to dirt bikes and motorcycles. Their presence will inevitably alter the visitor experience and adversely impact the environment and wildlife.

Bikers already have adequate access to some 23 miles of fire roads and 12 miles of multi-use trails in PRNS. They also have access to 112 miles of hiker-horse trails in PRNS if they leave their bikes at home and walk.

There are 637 miles of roads and trails on public lands in Marin County and bikers have access to 328 of those miles. Bikers have access to 118 miles of roads and trails on Marin County Open Space Preserves, 80 miles of roads and trails in the Marin Municipal Water District, 39 miles of roads and trails in California State Parks in Marin, 56

miles of roads and trails in the Golden Gate National Recreation Area, and 35 miles of roads and trails in PRNS. They have plenty of places to ride. If given access to trails narrower than fire roads in PRNS, the number of unauthorized "social" trails will inevitably increase. NPS does not have sufficient enforcement personnel to prevent this from happening, nor a sufficient maintenance budget to close them.

#1221

Name: N/A, N/A

Correspondence: Thank you for this opportunity to comment.

I am an avid mountain biker and enjoy both technical trails and long rides on fire roads. It allows me to truly enjoy nature and stay away from traffic, while exercising and staying healthy at the same time. Unfortunately, new mountain bike opportunities in Point Reyes Seashore and on GGNRA lands has been absent. It is time to review current connectivity gaps and loop opportunities for mountain biking. All improvements for mountain biking can also be shared with hikers and the two uses are very compatible. I would be happy to join our local groups as a volunteer to build and maintain trails.

Here are the access improvements I would like to see:

A new trail between Devils Gulch and Platform Bridge through the Cheda, McIsaac, and Zanardi Ranches.

A plan to connect the Cross Marin Trail into Point Reyes.

Adoption of social trails off Bolinas Ridge for better connectivity and a single-track trail experience.

Extend the Olema Valley Trail to Bolinas on the east side of Highway 1.

Close gaps for bikes through ranch lands in the park, including closing the Estero Trail loop, connecting Sir Francis Drake Blvd. with Pierce Point Road, and connecting Marshall Beach to Pierce Point Road,

A more bike-friendly permit application process for road and mountain bike events in the park, including along Bolinas Ridge and out to the lighthouse.

Bike access to all ranch roads in the pastoral zone that are already open to pedestrians.

Again, many thanks for the opportunity to comment.

#1222

Name: Schmidt, Bill

Correspondence: I support MCBC in it's efforts to ensure equal, safe access for all user groups including the under-represented biking user group for use on the trails in the Non-Wilderness areas of the Pt Reyes National Seashore. For far too long, this legitimate, growing user group has been excluded (and discriminated against by other groups) from access to these areas of Public Land! It's time to recognize that this land belongs to everyone and should be shared equally and fairly. Here is a list of the trails and projects that I support: A new trail between Devil's Gulch and Platform Bridge through the Cheda, McIsaac, and Zanardi Ranches. A plan to connect the Cross Marin Trail into Point Reyes. Adoption of social trails off Bolinas Ridge for better connectivity and a single-track trail experience. Extend the Olema Valley Trail to Bolinas on the east side of Highway 1. Close gaps for bikes through ranch lands in the park, including closing the Estero Trail loop, connecting Sir Francis Drake Blvd. with Pierce Point Road, and connecting Marshall Beach to Pierce Point Road, A more bike-friendly permit application process for road and mountain bike events in the park, including along Bolinas Ridge and out to the lighthouse. Bike access to all ranch roads in the pastoral zone that are already open to pedestrians.

#1223

Name: O'Hara, Janet

Correspondence: San Francisco Regional Water Quality Control Board (Water Board) staff appreciates the opportunity to comment on the Notice of Intent (NOI) to prepare an Environmental Impact Statement (EIS) for a General Management Plan (GMP) amendment, Point Reyes National Seashore and North District of Golden Gate National Recreation Area (planning area) by the National Park Service (NPS). The EIS for the GMP amendment will establish guidance for all lands currently under agricultural lease/permits within the planning area, relating to preservation of natural and cultural resources and management of infrastructure/visitor use. Based on the information provided in the NOI, 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.

Comments on Beneficial Uses The EIS will evaluate broad management strategies to improve visitor experience, preserve park resources, and a minimum of three alternatives for ranching operations: (1) No ranching; (2) no dairy ranching; and (3) reduced ranching. The EIS should identify and evaluate potential impacts and/or benefits of all proposed and alternatives actions and management strategies on existing beneficial uses protected by the San Francisco Water Quality Control Plan (Basin Plan). The following beneficial uses exist in the Marin Coastal Basin: " Agricultural Supply - Uses of water for farming, horticulture, or ranching, including but not limited to, irrigation, stock watering, or support of vegetation for range grazing. " Cold Freshwater Habitat - Uses of water that support cold water ecosystems, including, but not limited to, preservation or enhancement of aquatic habitats, vegetation, fish, or wildlife, including invertebrates. " Industrial Service Supply - Uses of water for industrial activities that do not depend primarily on water quality, including, but not limited to, mining, cooling water supply, hydraulic conveyance, gravel washing, fire protection, and oil well depressurization. " Ocean, Commercial, and Sport Fishing - Uses of water for commercial or recreational collection of fish, shellfish, or other organisms in oceans, bays, and estuaries, including, but not limited to, uses involving organisms intended for human consumption or bait purposes. " Marine Habitat - Uses of water that support marine ecosystems, including, but not limited to, preservation or enhancement of marine habitats, vegetation such as kelp, fish, shellfish, or wildlife (e.g., marine mammals, shorebirds). " Shellfish Harvesting - Uses of water that support habitats suitable for the collection of crustaceans and filter-feeding shellfish (e.g., clams, oysters, and mussels) for human consumption, commercial, or sport purposes. " Fish Migration - Uses of water that support habitats necessary for migration, acclimatization between fresh water and salt water, and protection of aquatic organisms that are temporary inhabitants of waters within the region. " Preservation of Rare and Endangered Species - Uses of waters that support habitats necessary for the survival and successful maintenance of plant or animal species established under state and/or federal law as rare, threatened, or endangered. " Fish Spawning - Uses of water that support high quality aquatic habitats suitable for reproduction and early development of fish. " Warm Freshwater Habitat - Uses of water that support warm water ecosystems including, but not limited to, preservation or enhancement of aquatic habitats, vegetation, fish, or wildlife, including invertebrates. " Wildlife Habitat - Uses of waters that support wildlife habitats, including, but not limited to, the preservation and enhancement of vegetation and prey species used by wildlife, such as waterfowl. " Water Contact Recreation - Uses of water for recreational activities involving body contact with water where ingestion of water is reasonably possible. These uses include, but are not limited to, swimming, wading, water-skiing, skin and scuba diving, surfing, whitewater activities, fishing, and uses of natural hot springs. National Parks Service - 3 - November 30, 2018 NOI to Prepare an EIS for Point Reyes General Management Plan Amendment " Noncontact Water Recreation - Uses of water for recreational activities involving proximity to water, but not normally involving contact with water where water ingestion is reasonably possible. These uses include, but are not limited to, picnicking, sunbathing, hiking, beachcombing, camping, boating, tide pool and marine life study, hunting, sightseeing, or aesthetic enjoyment in conjunction with the above activities. " Navigation - Uses of water for shipping, travel, or other transportation by private, military, or commercial vessels. The EIS should discuss these beneficial uses in the regulatory setting, identify any impacts to these beneficial uses, and if significant impacts are identified, provide mitigation to reduce impacts to less-than-significant.

Comments on Permitting The GMA amendment and the EIS will evaluate and propose management strategies and actions that have the potential to impact waters of the State, such as enhancing trail connections and water development actions to minimize elk-related impacts. Any actions that could impact wetlands, streams, tributaries, riparian habitat, or other waters of the State will require a Clean Water Act (CWA) Section 401 water

quality certification and/or Waste Discharge Requirements (WDRs) under Porter-Cologne from the Water Board. Water Board staff intend to work closely with the NPS to issue certifications and WDRs that are protective of water quality. To that end, we encourage NPS to fully align the proposed general management guidance with Water Board regulations, policies, and process to address potential impacts and facilitate/streamline project permitting. An essential guidance to include would be the U.S. EPA's Section 404(b)(1), Guidelines for Specification of Disposal Sites for Dredge or Fill Material, dated December 24, 1980. These Guidelines, found in the Basin Plan, identify the circumstances under which filling of wetlands, streams, or other waters of the State may be permitted. Utilizing these Guidelines, the Water Board prohibits all discharges of fill material into waters of the States, unless a discharge, as proposed, constitutes the least environmentally damaging practicable alternative that will achieve the basic project purpose. The Guidelines sequence the order in which proposals should be approached: 1) Avoid - avoid impacts to waters; 2) Minimize - modify project to minimize impacts to waters; and, 3) Mitigate - once impacts have been fully minimized, compensate for unavoidable impacts to waters. When it is not possible to avoid impacts to water bodies, disturbance should be minimized, and adequate compensation must be provided for the loss of water body acreage, functions, and values.

Comments on Ranching Alternatives The NOI describes a range of ranch management alternatives that will be evaluated in the EIS. The proposed action includes developing a land management framework that integrates agricultural diversification, increases operational flexibility, and promotes sustainable operational practices; comments on each are provided below. We have worked closely with NPS rangeland management staff and ranchers to improve ranching practices for a reduction in impacts to water quality, aquatic species and sensitive vegetation habitat (e.g. riparian zone and wetlands), and stream geomorphic and watershed processes (e.g. hydrology and sediment generation and transport). We have found that, with sustainable cattle rangeland and ranch management practices (e.g., rotational grazing), properly installed and maintained best management practices (BMPs), and appropriately prescribed grazing densities (by NPS), the existing ranching activities are compatible with protecting these resources.

1. Diversification: Diversification activities (e.g. poultry) would be allowed in the Ranch Core zone. Pasture areas would allow for some increased pasture management activities. Range areas would be dedicated to livestock grazing. Diversification activities in specifically identified locations within the planning area may not have impacts to natural resources in many cases. The potential for impacts will be specific to the type and location of diversification. The EIS should produce maps clearly identifying the types of diversification allowed in specific locations (see Ranch Core comments below). Areas that are too sensitive for diversification, or types of diversification that have a high impact generally, should be identified at the time of the EIS. Specific diversification activities that would be allowed in different land management units (LMUs) should be specifically identified and impacts considered. For example, chickens will have a different impact than pigs; crop impacts can vary depending on rates of fertilization, water use, and tilling. 2. Ranch Core areas: These constitute a small percentage of the land area but can have a relatively high impact on surface and groundwater. In the past, many dairies and ranches located their ranch infrastructure in low lying areas. These low-lying areas frequently flood due to their locations in the floodplain, on an alluvial fan, or from the convergence of high volumes of stormwater runoff from surrounding hillsides. Runoff from these areas is difficult to manage using BMPs because the flows can be very high, the stream course unstable (alluvial fans), and it is challenging to install suitable, cost-effective BMPs. For example, a typical economical BMP such as vegetated filtration strip, is not useful during flood flows and may also be ineffective due to the large volumes of stormwater overland flow that prevent filtration of the pollutants by the vegetation. It is our understanding that in most current rangeland operations, cattle are not held in these Core areas for significant durations and predominantly are on the range and pasture lands. This significantly reduces pollutant generation and transport. However, if increased agricultural diversification occurs in Core areas, there may be significant generation and discharge of pollutants such as fertilizers (nitrogen and phosphorous), pesticides, and increased pathogens. 3. Pasture areas: It is unclear exactly how pasture areas have been determined. However, the basis for slopes < 20% as a qualifying topographic element should be identified. Changes in land use below 20% slope can have significant impacts on watershed processes such as hydrology and sediment generation and transport. Agricultural diversification in pasture areas may not have negative impacts to natural resources if the appropriate type of diversification is selected and correctly located. As an example, we have observed low density hen houses on wheels being used on ranches to increase diversification. With proper

site selection and site rotation, this practice appears to have minimal natural resource impacts. The EIS should consider clear criteria for types of diversification and location criteria for pasture lands. Restrictions such as the proximity to ephemeral, intermittent and perennial streams, areas of high stormwater runoff, wetlands, natural ponds or other sensitive resources should be considered. Impacts to watershed scale processes (e.g. hydrology, sediment transport and generation) should also be assessed. 4. Water Use: Ephemeral, intermittent and perennial streams, wetlands, ponds, and seeps all provide critical functions for aquatic life and wildlife and determine vegetation composition in the watershed. Aquatic life and wildlife include the endangered coho salmon, threatened Steelhead, endangered red-legged frog, and freshwater shrimp; and wetland, riparian zone, and swale vegetation communities. To protect these beneficial uses, activities and facility changes identified in the GMP amendment should not result in increased surface water or ground water use. Low flows and drying pools in tributaries such as John West Fork are negatively impacting salmonids during late summer. Additional demand on water resources could have significant and negative consequences on these sensitive species and communities. The introduction of up to 2.5 acres of row crops per ranch and increased diversification of agriculture could increase water demand. This should be evaluated under current climate conditions and predicted climate change scenarios, with some thought given to monitoring water use.

Comments on Section 303(d) List Tomales Bay and its tributaries are on the CWA section 303(d) list of impaired water bodies for pathogens. Two known pathogen sources are manure from livestock and residential/commercial septic systems. Lagunitas Creek is listed as impaired for sediment. The action plans for these water bodies, known as Total Maximum Daily Loads (TMDL), call for reductions in these pollutants. The EIS should consider the impact of agricultural diversification and increased recreational facilities (trails, picnic areas, and housing with associated restrooms/septic) with regards to TMDLs. As part of implementing the Tomales Bay and Lagunitas Creek TMDLs, the Water Board has adopted two regulatory programs to oversee rangelands, dairies and other confined animal facilities such as equestrian facilities. Our regulatory programs for grazing and commercial animal production require livestock grazing lands and confined animal facilities, including dairies and equestrian facilities, to implement management measures to control and reduce animal waste and sediment runoff to receiving waters. These programs apply to grazing operations and existing confined animal facilities that are located in the NPS planning area. General Comments 1. 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. 2. The positive impacts of increasing leases to 20-year leases should be considered in the EIS. Positive impacts may include increased incentive for agricultural operators to invest time and finances into BMPs and increased grant fundraising opportunities, as grants may require long-term commitments. Additionally, measures to discontinue leases when lessees do not adequately protect natural resources as required in their leases should be evaluated. 3. The GMP amendment creates Land Management Units (LMUs) allowing different intensities of land use in Range, Pasture and Ranch Core (Core) LMUs. As stated in the NOI, Diversification activities (e.g., poultry) would be allowed in the ranch core zone. Pasture areas would allow for some increased pasture management activities. Range areas would be dedicated to livestock grazing. As each land use allows different types of use and intensity of use, it appears to be understood that these are decreasing in ecological sensitivity (Range, Pasture, Core areas). For many areas however, the degree of ecological sensitivity depends on the natural resource characteristic and impact considered. For example, relatively pristine rangelands are important sources of grasslands and rare vegetation habitat and are critical for many wildlife species, while Core areas may not be. However, Core areas may consist of floodplains, alluvial fans, and stormwater flow convergence and drainage areas promoting critical stream functions, wetland and riparian vegetation, and groundwater recharge zones. The rationale for dividing the ranches into these LMUs, the natural resource functions of each provides, and potential impacts from the allowed activities must be fully evaluated in EIS.

Closing Again, we appreciate the opportunity to comment on the NOI, and we reiterate our intention to work closely with the NPS in permitting future projects in the planning area. If you have questions about our comments, please contact Nicole Fairley at nicole.fairley@waterboards.ca.gov or (510) 622-2424. Sincerely, Janet OHara

Senior Environmental Scientist Planning and TMDL Division Cc: State Clearinghouse,
State.Clearinghouse@opr.ca.gov

#1224

Name: Munson, James

Correspondence: November 30, 2018

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

Subject: 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.

Dear Ms. Muldoon:

The Environmental Protection Agency (EPA) has reviewed the subject Notice of Intent (NOI) to prepare an Draft
Environmental Impact Statement (DEIS) for the above action. Our review is pursuant to the National
Environmental Policy Act (NEPA), Council on Environmental Quality (CEQ) regulations (40 CFR Parts 1500-
1508), and our NEPA review authority under Section 309 of the Clean Air Act. To assist in the scoping process for
the project, this letter provides EPA's recommendations for the National Park Service's consideration in the
development of the EIS.

Purpose and Need

The NOI states that the need for the proposed action is to "address the park's highest priority planning issues,
which include the management of approximately 28,800 acres of land currently leased for ranching". To guide the
development of an appropriate range of reasonable alternatives, EPA recommends that the need statement clarify
the issue (i.e., underlying problem, conflict, or opportunity) regarding management of the leased lands and
identify the full suite of "highest priority planning issues" that the NPS seeks to address through the proposed
action.

Range of Alternatives

According to the Notice of Intent, the NPS is required, under the terms of a Settlement Agreement, to "give full
consideration to and disclose the impacts of three alternatives: (1) No ranching; (2) no dairy ranching; and (3)
reduced ranching." In accordance with the regulation at 40 CFR 1502.14(c), any additional reasonable alternatives
that would fulfill the project's purpose and need should also be evaluated in detail in the DEIS. Explain, in the
DEIS, the reasons for the elimination of any alternatives that are not evaluated in detail. If the environmentally
preferable alternative has been identified, disclose it in the DEIS.

Water Quantity

Based on the PORE Public Scoping Newsletter additional lands would be made available for "row crops and other
livestock" under some of the alternatives. EPA recommends that the DEIS include a comparison of the water
usage requirements of each alternative, including a comparison of the water usage requirements of any proposed
food or feed crops. We also recommend that the DEIS describe the water source(s) and projected impacts of each
alternative on each water source. Consider reasonably foreseeable changes in climate that could exacerbate or
mitigate such impacts.

Water Quality

The DEIS should disclose and analyze the potential impacts on water quality that could occur under each alternative as a result of both point and nonpoint source discharges. Disclose and analyze the impacts of the types of wastewater discharge and runoff expected, taking into consideration activities such as fertilizer and pesticide use, as well as livestock waste management. Water quality impacts may include, but are not limited to: nutrients, sediment, fecal indicator bacteria, thermal changes, increases in suspended solids, biological waste, toxicity, and changes in pH. Include, in the DEIS, available data from any existing discharge, runoff, and water quality monitoring efforts. Discuss, in the DEIS, existing water quality in and downstream of the planning area and identify any existing impairments. The Clean Water Act (CWA) requires States to develop a list of impaired waters that do not meet water quality standards; establish priority rankings; and develop action plans, called Total Maximum Daily Loads (TMDLs), to improve water quality. Tomales Bay is listed as impaired for pathogens, mercury, nutrients, and sedimentation. The San Francisco Bay Regional Water Quality Control Board (Regional Board) has developed separate TMDLs for pathogens and for mercury for Tomales Bay. Additionally, the Regional Board regulates grazing lands through waste discharge requirements in order to implement the pathogen TMDL and address potential discharges from agricultural runoff. The DEIS should evaluate each alternative's impacts to water quality, and demonstrate how each alternative would meet Tomales Bay TMDL requirements and comply with the Regional Board's Grazing Waiver program. EPA recommends that the NPS coordinate with the Regional Board in development of appropriate conservation and management practices for future grazing activities

Point Reyes National Seashore falls within the boundaries of the Greater Farallones National Marine Sanctuary, a nationally significant marine ecosystem that supports many threatened and endangered species. EPA recommends that the DEIS evaluate the potential impacts of each alternative on water quality in the Sanctuary's near-shore and estuarine environments, including Tomales Bay.

Species of Concern

Identify in the DEIS all federally listed threatened or endangered species and critical habitat, as well as other species of concern that might occur within the project area. For each alternative, discuss any direct, indirect, or cumulative impacts on such species or habitat. Disclose in the DEIS the status or outcome of consultation with the U.S. Fish and Wildlife Service under Section 7 of the Endangered Species Act, if applicable, and include the biological assessment in an appendix. For each alternative under which non-native species would be introduced or increased in number within the planning area, identify the species and evaluate the potential impacts, including any potential conflicts with native species and their habitat.

Air Quality

Disclose, in the DEIS, the current status of the planning area with respect to attainment of national ambient air quality standards. Identify all sources of air quality emissions, including those from agricultural operations, that would occur under each alternative. For example, crop and livestock production are a significant source of greenhouse gas emissions (<https://www.epa.gov/ghgemissions/sources-greenhouse-gas-emissions>). Quantify emissions to the extent possible to facilitate comparisons across alternatives. Disclose any measures that could avoid, minimize, or mitigate air emissions.

We appreciate the opportunity to review this NOI. When the DEIS is released for public review, please send one hard copy and one electronic copy to the address above (mail code: ENF-4-2). If you have any questions, please contact me at (415) 972-3852 or munson.james@epa.gov.

Sincerely,

/s/

James Munson, Lead Reviewer Environmental Review Section

#1225

Name: Williams, Patti

Correspondence:

"In wildness is the preservation of the world." So said Henry David Thoreau over 160 years ago, and it is true and necessary to act on now more than ever. Congress authorized wilderness areas to be protected and preserved as naturally as possible, with no mechanized incursions. The National Park Service is entrusted with this mission. I am opposed to allowing bicycles to be used in wilderness areas in any National Park Service unit. In Marin County, including Point Reyes National Seashore, bicyclists already have access to 75% of the area trails. Day hikers, backpackers, and horse riders are looking for a quiet nature experience on the spectacular, mystical trails of Point Reyes National Seashore. This type of experience is getting harder and harder to find in our busy world and should be all the more protected from interest group pressures. Please do not cave in to pressure from the bicycle lobby. They will always want more and more and will never be satisfied. All we want is to keep the wilderness as natural as possible, with access to the natural beauty of Point Reyes' trails on foot, whether hiking boot or hoof, as it has always been and as Congress intended. Cyclists tend to not stay on approved trails and stay slow enough to not run into hikers and equestrians.

#1226

Name: Seligman, Jason

Correspondence: Thank you for the opportunity to comment on the use of bicycles within Point Reyes National Seashore and connections to the surrounding area trails.

Though it has been a few years since I have ridden those trails, I rode them, were permitted for many years, including with trips for kids rides, and as part of many scail groups. They are wonderful.

I would encourage the parks to improve access for non-motorized human powered bicycles broadly, and to think about access for exit points for safety personnel that can support the humans that ride them when things go wrong.

Point Reyes is a wonderful destination and improving connections to other bike trails in Samuel P. Taylor and other nearby connector parks and towns should help folks to enjoy riding there without having to drive to do it.

Thank you again and Happy Trails, Jason Seligman

#1227

Name: giammona, michael

Correspondence: Giammona Family Ranch

Cicely Muldoon Superintendent Point Reyes National Seashore 1 Bear Valley Road Point Reyes, CA 94956

Dear Superintendent:

Thank you for the opportunity to comment on General Management Plan (GMP) concerning continued ranching in the Point Reyes National Seashore and Golden Gate) Recreational Area. (GGNRA)

We would like to start by saying "we agree and support the current GMP comment letter dated November 20, 2018 from the Point Reyes seashore Ranchers Association".

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-two 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 currently working with the Marin resource Conservation district, (RCD), National Park service (NPS) and The Natural Resource Conservation District (NRCS) on a large project to help improve water quality at a costly, but worthwhile project with financial and labor contribution from our family. We are committed to implement best management practices in our operation, and to help promote the most sustainable ranch management practices. We look forward to continuing to work with NPS, RCD, as well as NRCS into the future.

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. 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

We would like to 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 periodically 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 the barns periodically to raise day old chicks. Also we would like to experiment with rotational grazing the laying hens in the pasture, we have seen great results of soil and plant health while having the hens around.

Thank you for the opportunity to comment and look forward in working with the NPS in the future.

Mike, Connie, Ryan and Morgan Giammona

#1228

Name: Andrews, Rob

Correspondence: My comments are limited to concerns about the plan applied to the Tomales Point area of the Park. I have been visiting this part of the park for over 35 years now; typically hiking the trail from Pierce Point Ranch to Tomales Point. I have had the unique pleasure of observing a lot of wildlife activity here, including not only two herds of Tule Elk that frequent this area, but also significant bird activity, deer, and smaller native mammals. Before this area became overwhelmed by buses of (often international) tourists and horse activity (more on both below) I was fortunate enough to a mountain lion in this area of the Park. I am not as familiar with other areas of the park or the issues raised by this plan for those areas, and so, am not commenting on the elements of the plan as they directly apply to areas outside of the Tomales Point and the access to the trailhead.

I have several concerns about current and changing use at Tomales Point. First is separating 'wilderness' use of Tomales Point from more intensive tourism in the park in general, second is eliminating and cleaning up the operating ranches in this part of the park, Third is separating horse traffic on the trail from pedestrians.

In recent years the Tomales Point area has become increasingly popular, especially with large hordes of tourists. Typically the tour bus arrives, unloads and the crowd hikes down the trail until they encounter the tule elk. At that point they stop, take pictures and then turn around and leave. That's the best case scenario, unfortunately many of these tourists think this is a petting zoo and therefore need oversight from Park Rangers to not approach the elk (Doh!). Given this clear demand to see the elk, this proposed plan should address ways to provide easier access to the elk for people who have no interest in hiking, while removing tour buses on Pierce Ranch Road. More, rather than fewer elk can provide this opportunity, but additional elk should be introduced closer to Sir Frances Drake Boulevard, with bus parking and other access improvements made to manage the hordes of tourists.

The scoping documents provided for comment discuss leasing options for the ranches within the park and assert that these ranches serve an important historic perspective on the site and provide scenic value. The operating ranches on the Pierce Point Road don't exhibit any obvious historic value and are certainly not scenic. The scoping documents even note that the majority of ranch facilities are in poor condition. The operators of these ranches are not fulfilling any obligation to maintain these facilities and comply with the Clean Water Act. whereas agricultural facilities are exempt from CWA and so not legally obligated to comply, operating on limited leases within a national Park should require them to hold to an even higher standard; which they have not. I want to note here as well that the "No Action" option is not correctly stated. Extending ranch leases when there is no legal obligation to do so is by definition an action. The "No Action" alternative would allow all of the leases to expire, remove the ranches and allow for expansion of park use on these lands (including growth of the elk herds).

So rather than benefitting cattle and dairy ranching within the Park, the emphasis should be on expanding non-commercial use of the Park and protection of natural resources.

This need not be entirely exclusive of ranching activity at the Park if the ranches convert to ranching (farming?) elk instead of cattle. This would provide an opportunity for continued ranching, give more developed access for tourists to view the elk and reduce traffic on Pierce Ranch Road. Ranged elk would have significantly less impact on the environment than cattle and are a marketable commodity, as people shift away from eating beef.

The Park Service's apparent preferred plan of reducing the size of the elk herds and continued ranching operations in the Park will lead to continued overcrowding at Tomales Point, and will create pressure to 'improve' the road and construct additional facilities at Pierce Ranch. This critical 'back country' experience at Tomales Point is already heavily impacted, The Park Service's preferred plan will ultimately eliminate the unique combination of rural and 'wild' land experience that defines Tomales Point.

And, finally, the issue of horse use at Tomales Point. In recent years the trail to Tomales Point has become increasingly impacted with horse traffic. The horse shit, smell and flies did not exist here until fairly recently (within my 35-year timeline of visiting). Now it can be an unpleasant walk where you have to shoo the flies away and endure the stink and piles of you know what. Most Bay Area Regional Parks provide separate trails for equestrian and pedestrian use for these exact reasons. So unless and until the Park Service develops a secondary trail here for equestrian use, this trail should be designated as pedestrian use only.

#1229

Name: Lucas, Catherine

Correspondence: I support ALTERNATIVE F: NO RANCHING AND EXPANSION OF TULE ELK IN THE PLANNING AREA.

I believe the role of National Parks is to preserve wilderness and the natural environment for the enjoyment of present and future generations. Their role is not to subsidize commercial ranching operations, other commercial

enterprises or resource extraction within park boundaries. (With the exception of park facilities such as visitor centers, lodgings and concessionaires.)

I do not believe when Congress purchased the land comprising PRNS in 1978 that the intent was to continue ranching indefinitely. Instead Congress made clear that ranchers could only reserve "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."

And yet, decades later, ranching continues to be protected and prioritized at the expense of the natural environment. Despite efforts to introduce best management practices, cattle and dairy operations continue to pollute Drake's Estero and degrade essential wildlife habitat for threatened and endangered species. And with the cataclysmic changes of global warming looming over us, protecting wilderness and all the species which inhabit it, is not just important, it is imperative.

Dairy and beef ranching are major contributors to climate change, so how can it possibly make sense for a national park to subsidize an activity that is detrimental to the primary goal of preserving wilderness?

I am absolutely opposed to prioritizing cattle over elk. And I am equally opposed to any kind of diversification, be it other livestock or row crops. Diversification will inevitably increase conflict between ranchers and wildlife within the park. Whether it is the deliberate reduction of predator species (including coyotes, bobcats, birds of prey) because they prey on livestock. Or the unintentional secondary poisoning of predator species through the use of rodent control methods, such as arsenic which is permitted even under organic farming regulations, to prevent gophers and rats from damaging row crops.

Point Reyes National Seashore is a national park, not a ranch. It is time to phase out ranching and fully protect the unique coastal eco-system of the Point Reyes Peninsula.

#1230

Name: N/A, N/A

Correspondence: Time to open trails to mountain bikes.

A new trail between Devil's Gulch and Platform Bridge through the Cheda, McIsaac, and Zanardi Ranches.

A plan to connect the Cross Marin Trail into Point Reyes.

Adoption of social trails off Bolinas Ridge for better connectivity and a single-track trail experience.

Extend the Olema Valley Trail to Bolinas on the east side of Highway 1.

Close gaps for bikes through ranch lands in the park, including closing the Estero Trail loop, connecting Sir Francis Drake Blvd. with Pierce Point Road, and connecting Marshall Beach to Pierce Point Road,

A more bike-friendly permit application process for road and mountain bike events in the park, including along Bolinas Ridge and out to the lighthouse.

Bike access to all ranch roads in the pastoral zone that are already open to pedestrians.

Thank you.

#1231

Name: Nelson, Patricia

Correspondence: 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 - Environmental Impact Statement Scoping Comments

Dear Superintendent Muldoon,

Introduction

Thank you for the opportunity to comment during this formal scoping phase of 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).

I have lived in Marin County for 58 years. I have visited and recreated in the area of the national seashore, appreciating its history and natural systems. I also value the way in which so many groups worked together to bring this unique national park into being, and the large amount of open space that has been conserved around the park. The careful, coordinated conservation of open space makes Marin County an unusual place and a model for environmentalism. In the hope of preserving this unique effort, I ask that you consider the following issues.

ISSUES

1. Define terms that are being used rhetorically

To the extent that the EIS analyzes that theory that ranches in the national seashore are actually "unsustainable" or "industrial" operations, these terms should be clearly defined and the definitions should be applied consistently. Clear and appropriate definitions are tools. They help the public and agency decisionmakers to separate emotional rhetoric from reasoned analysis.

There are several sources that might help in arriving at definitions. For example, the Union of Concerned Scientists describes the features of industrial agriculture. Today, the majority of American farmland is dominated by industrial agriculture-the system of chemically intensive food production developed in the decades after World War II, featuring enormous single-crop farms and animal production facilities." Further, "Much of industrial monoculture's harvest goes to feed livestock in concentrated animal feeding operations, or CAFOs, where they are fed a high-calorie, grain-based diet, often supplemented with antibiotics and hormones, to maximize their weight gain. Their waste is concentrated and becomes an environmental problem, not the convenient source of fertilizer that manure can be for more diverse, less massively scaled farms. See https://www.ucsusa.org/our-work/food-agriculture/our-failing-food-system/industrial-agriculture#.W_xnjOSoOUk. If this were the applicable definition, decisionmakers could begin by looking at any actual increases in the size of ranches or operations since World War II. They would also be assisted in their reasoned analysis if they look at the number of ranches that have obtained met the stringent organic livestock standards of the USDA.

"Sustainable agriculture" was addressed by Congress in the 1990 Farm Bill [Food, Agriculture, Conservation, and Trade Act of 1990 (FACTA), Public Law 101-624, Title XVI, Subtitle A, Section 1603 (Government Printing Office, Washington, DC, 1990) NAL Call # KF1692.A31 1990]. Under that law,

the term sustainable agriculture means an integrated system of plant and animal production practices having a site-specific application that will, over the long term: o satisfy human food and fiber needs; o enhance environmental quality and the natural resource base upon which the agricultural economy depends; o make the

most efficient use of nonrenewable resources and on-farm resources and integrate, where appropriate, natural biological cycles and controls; o sustain the economic viability of farm operations; and o enhance the quality of life for farmers and society as a whole. See Mary V. Gold's compilation of definitions for the USDA, Sustainable Agriculture: Definitions and Terms, <https://www.nal.usda.gov/afsic/sustainable-agriculture-definitions-and-terms>.

2. Consider all relevant socioeconomic effects of curtailing or eliminating ranching

a. Agricultural Critical Mass

Ranching in the park does not exist in isolation. In considering whether it is desirable to eliminate or reduce ranching in the park, the EIS should examine the impact on the viability of agriculture throughout the county, because agriculture is a valued and valuable industry that contributes to the maintenance of open space in the county.

The EIS should consider whether eliminating ranching in the park affects the “critical mass” of farmland that is necessary to maintain the economic viability of farming/ranching in the county. The critical mass theory posits that as the acreage in production and aggregated farm productivity decline, the cost-revenue ratio of support businesses will rise, forcing suppliers and processors to close or relocate. As they do so, farmers' and ranchers' transportation and other costs of doing business rise. Higher costs in a low-margin enterprise significantly affect the competitiveness of regional agriculture, possibly leading to large-scale collapse of agriculture both within and outside of the park.

If local agriculture is no longer viable, the basis for maintaining large swathes of open space around the park goes away as well. These open spaces are maintained via agricultural easements.

b. Consider the Value of Ranching in the Park as a Model of Environmental Cooperation and Innovation

Decisionmakers and the public should carefully consider impacts of the various proposed alternatives on a rare model of cooperation that fosters sustainability. This is a piece of living history that began with the ranchers assuming a major role in advocating for the creation of the national park. In the years since the park was created, a number of ranchers have worked actively with water and wildlife agencies on environmental projects. A simple list of these projects would be extensive and illuminating. An EPA acquaintance of mine has commented that in her extensive work with the real “big ag” operations in the San Joaquin Valley, she could only dream of ag operators who would willingly and even enthusiastically cooperate with government personnel to improve the environment, as ranchers do in West Marin.

No analysis of the impact of ranching in the park would be complete without an analysis of carbon farming. In cooperation with ranchers, Marin Carbon Project has been a driving force to implement carbon farming practices that can render ranching operations carbon-neutral or carbon-negative. West Marin has been a laboratory for carbon farming. The goal of MCP is to develop and implement 20 carbon farming plans by 2020. See In January 2018, Supervisor Damon Connolly reported to Marin Conservation League's Climate Action Working Group (CAWG) that the California Department of Agriculture released its first Healthy Soils Awards in December. Four Marin County ranches received grants to implement carbon farming practices. See <https://www.marincarbonproject.org/news#healthy-soils-grants>. Letters of support have been written for three additional ranches to implement carbon farming plans.

Outreach to the agricultural community is a facet of the County's implementation of its Climate Action Plan (CAP). The county is coordinating with Marin Carbon Project, Marin Resource Conservation District, and other organizations to identify areas for assistance and target specific projects that can move the needle in CAP implementation. See CAWG minutes on Marin Conservation League website, May 2017, January 2018.

c. Family Farming

Decisionmakers should consider impacts on family farms because family farms can be mobilized as allies to promote sustainability. They are also an endangered bastion against industrialized farming. There is a long, unfortunate history of misguided federal policies that promote industrial farming at the expense of family farming, in part by removing incentives for conservation. See, e.g., Foodprint, Sustainable Agriculture vs. Industrial Agriculture, <https://foodprint.org/issues/sustainable-agriculture-vs-industrial-agriculture/>. 3. Consider the historic status of the ranches

As noted recently in the Marin Independent Journal, Seventeen ranches and about 150 structures are included in the newly recognized, 22,237-acre Point Reyes Peninsula Dairy Ranches Historic District. The designation made last month comes after a multi-year effort by the National Park Service dating back to when park historian Dewey Livingston first conceptualized the idea in the mid-1990s. Some of the dairy ranches are more than 160 years old. The designation comes as the park is preparing an environmental review on how it should manage tule elk and the leases that allow ranchers to operate in the park. Some of the alternatives being considered would reduce or entirely do away with ranching and dairy operations within the park. Paul Engel, the park's archaeologist and cultural resources program lead, said the historic place designation requires the park to minimize impacts to the actual locations and structures rather than dairy operations, though the two are often tied together. The pastures themselves are also part of this and so when you look at the buildings, the pastures, the ongoing ranching sort of helps to maintain those things," Engel said Wednesday. "So if you have a grazing pasture that transitions into a forest, it's really no longer a pasture anymore and that would be a negative impact." Marin Independent Journal, story by Will Houston, Nov. 14, 2018, <https://www.marinij.com/2018/11/14/point-reyes-ranches-listed-in-national-registry-of-historic-places/> The designation reflects "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." Id. The Advisory Council on Historic Preservation's (ACHP's) Section 106 of the National Historic Preservation Act (NHPA) regulations (36 CFR 800) prescribes early coordination and inclusion of historic preservation issues in a NEPA analysis. In considering whether an action may "significantly affect the quality of the human environment," an agency must consider unique characteristics of the geographic area (40 CFR 1508.27(b)(3)). Section 106 review should be conducted during preparation of any EIS. Scoping, identification, and assessment of effects should be done during the analysis leading to the draft EIS (DEIS), and the results should be presented in the DEIS. Consultation to resolve adverse effects should be coordinated with public comment on the DEIS, with the results reported in the final EIS (FEIS). Any Memorandum of Agreement (MOA) developed under Section 106, or the final comments of the ACHP, should be addressed in the ROD. Unless there is some compelling reason to do otherwise, the Section 106 MOA should be fully executed before the ROD is issued, and the ROD should provide for implementation of the MOA's terms.

Conclusion

Thank you for considering these scoping comments. Sincerely, Patricia Nelson

#1232

Name: Garvin, Fred

Correspondence: It's time to share the 123 miles of trails with bikes. Horsey folks need to learn to share. Please give us just 1 mile of trail to see if it is even possible to share. I know bikers can. Even if it's only one day a week or month. You've NEVER EVEN TRIED so how do you know it wont work??? We are the bigger user and we have ZERO influence and ZERO trails. How is that fair??? So sad. Give us some godamn trail PLEASE!!!!!!!!!!!!!! That is all.

#1233

Name: Gaffney, Maureen

Correspondence: Greetings NPS,

I am delighted that you are reviewing your plans for leased and ag lands in Point Reyes National Seashore. This is a unique opportunity to create better connectivity, safety, and visitor experiences for cyclists, a long-neglected and ever-growing user group and NPS constituency. Please incorporate the following into your planning:

A new trail between Devil's Gulch and Platform Bridge through the Cheda, McIsaac, and Zanardi Ranches.

A plan to connect the Cross Marin Trail into Point Reyes.

Adoption of social trails off Bolinas Ridge for better connectivity and a single-track trail experience.

An extension of the Olema Valley Trail to Bolinas on the east side of Highway 1.

Gap closures for bikes through ranch lands in the park, including closing the Estero Trail loop, connecting Sir Francis Drake Blvd with Pierce Point Road, and connecting Marshall Beach to Pierce Point Road.

A more bike-friendly permit application process for road and mountain bike events in the park, including along Bolinas Ridge and out to the lighthouse.

Bike access to all ranch roads in the pastoral zone that are already open to pedestrians.

Thank you very much for considering these comments. Sincerely, Maureen Gaffney

#1234

Name: Pitts, Justin

Correspondence: Good afternoon.

I'd like to voice my support for the following projects currently being considered in the Point Reyes National Seashore:

1. A new trail between Devil's Gulch and Platform Bridge through the Cheda, McIsaac, and Zanardi Ranches.
2. A plan to connect the Cross Marin Trail into Point Reyes.
3. Adoption of social trails off Bolinas Ridge for better connectivity and a single-track trail experience.
4. Extend the Olema Valley Trail to Bolinas on the east side of Highway 1.
5. Close gaps for bikes through ranch lands in the park, including closing the Estero Trail loop, connecting Sir Francis Drake Blvd. with Pierce Point Road, and connecting Marshall Beach to Pierce Point Road.
6. A more bike-friendly permit application process for road and mountain bike events in the park, including along Bolinas Ridge and out to the lighthouse.
7. Bike access to all ranch roads in the pastoral zone that are already open to pedestrians.

As a firm believer in the idea of public land I believe that these project would be of great benefit to the many visitors that come to Point Reyes National Seashore. I also believe that these projects can be implemented in a sustainable fashion that would not detract from the environment or other's enjoyment of this stunning area.

Thank you,

Justin Pitts

#1235

Name: Fain, Nick

Correspondence: I am a 64yr old resident of Fairfax, CA. I am a hiker, cyclist, nature & wildlife photographer, environmentalist and am devoted to the wild places of beautiful Marin County. I moved here 30 years ago to be close to nature, the ocean, and to be with the kindred spirits of cycling -especially the mountain biking community.

My girlfriend and I also love the Pt Reyes seashore area in many ways. We would very much appreciate having greater access as off road cyclists. We don't ride roads much anymore as they're too dangerous. On my last road ride we were on Pierce Pt Road where a driver -in a solo accident- rolled her car multiple times in the gap between myself and the rest of our group. She totaled the car, and sustained injuries. This was on a clear Saturday morning, with no other car in sight, and the woman was sober, just in "a hurry". The posted speed limit as I recall was 35mph. A recent incident on Sir Francis Drake Blvd resulted in the death of a cyclist caused by a drunk driver. And this on a road with wide shoulders. Events like these are why I and most of my friends only ride bikes on dirt.

We are polite cyclists, and respect that some areas should remain off limits to bikes. But I have travelled to many other western states -including parts of California- where cyclists and other user groups (including equestrians) coexist peacefully. I see no reason why a few dirt roads and trails in Pt Reyes Seashore area could not be made accessible to cyclists. I have heard there is some resistance from equestrians on this, and I can understand how they may wish to have some areas where bikes are not permitted. But I don't understand why one user group that has access to almost ALL areas could not share SOME areas with cyclists. We are a growing demographic, and were so before the first automobile ever pattered down a dirt road.

I joined a large group of cyclist volunteers a few years back for a day of trail maintenance on Olema Valley Trail. I also recall that we were the ONLY user group who turned out that day. As cyclists we believe in being committed stewards of open spaces & trails. And we appreciate having access to a fair share of the appropriate lands, roads and trails.

Thank you.

sincerely,

/Nick Fain

#1236

Name: Silva, Mark

Correspondence: While I appreciate a public comment period over the future of our park, I wonder what the point is as it appears that the fix was in from the start, and the park's future seems to have been predetermined by our congressman and special interests (ranchers and anti-public land advocates) from the start. The people of West Marin who, 40 years ago, fought to prevent ranchers from selling their farms to developers and to the Preserve, for purposes of public recreation, benefit, and inspiration, a portion of the diminishing seashore of the United States that remains undeveloped (Public Law 87-657), must feel more than a little bit betrayed. I think the announcement of the Federal recognition of the ranges in the middle of the comment period more than a little suspicious. As now they have extra Federal protection from consideration for removal. At this point I don't expect any of the plans presented to us at West Marin School would ever have been seriously considered. In fact, I expect that the remaining Elk will be removed or killed and our current Secretary of Interior will green light the expansion of ranching and even farming in the park. So, what would I like to see? A Park! An actual National Park. Wild, natural open space (no fences) as it was before ranchers, the gold rush or even Sir Frances Drake. At this point I would settle for a full and complete environmental impact study to really see, for the first time, how much impact the Sustainable Ranches really have on the local environment.

#1237

Name: Frommer, Bob

Correspondence: I would like to see more off-road biking opportunities in Pt. Reyes.

#1238

Name: Tucker, Janice

Correspondence: I am 67 years young. I enjoy the serenity of riding my horse in a safe environment free of bicycles, motorcycles and cars. The operators of these vehicles often do not respect the unpredictability of horses. These trail horses are well trained, but they are still prey animals and can become frightened by u unexpected movements and sounds. Please keep the few remaining areas open to us. Stewart Equestrian Campground is truly my most favorite place for the past 35 years. Please keep it equestrian only as well. THANK YOU for your consideration. Janice Tucker

#1239

Name: Mullins, Brian

Correspondence: Thank you for the opportunity to comment. Access4Bikes represents approximately 3000 local mountain bike enthusiasts. Mountain biking has grown much in popularity and now represents your second largest user group at around 40%. Unfortunately new mountain bike opportunities in Point Reyes Seashore and on GGNRA lands has been absent. It is time to review current connectivity gaps and loop opportunities for mountain biking. All improvements for mountain biking can also be shared with hikers and the two uses are very compatible. Also note that Access4Bikes can organize volunteer days to offset the financial burden of trail development/improvement. We are ready to help! Here are the access improvements we are interested in seeing developed:

A new trail between Devils Gulch and Platform Bridge through the Cheda, McIsaac, and Zanardi Ranches.

A plan to connect the Cross Marin Trail into Point Reyes.

Adoption of social trails off Bolinas Ridge for better connectivity and a single-track trail experience.

Extend the Olema Valley Trail to Bolinas on the east side of Highway 1.

Close gaps for bikes through ranch lands in the park, including closing the Estero Trail loop, connecting Sir Francis Drake Blvd. with Pierce Point Road, and connecting Marshall Beach to Pierce Point Road,

A more bike-friendly permit application process for road and mountain bike events in the park, including along Bolinas Ridge and out to the lighthouse.

Bike access to all ranch roads in the pastoral zone that are already open to pedestrians.

#1240

Name: Clougherty, Kristy

Correspondence: The time is now to put our wild before ourselves.

#1241

Name: Merrill, Charles

Correspondence: Hello, Thank you for the opportunity to comment. I have been a Marin resident for 50 years. I STRONGLY support safer, connective bicycle access in Pt. Reyes. My wife was an international, competitive athlete until she was hit by a truck while she was in a Marin Safe Routes to Schools bike path 2 years ago. We know first hand and in a very real way how important safe connective non-motor vehicle access is. Bicycles are the preferred recreation mode for many. I can think of no reason that bikes should not have access to all ranch roads in the pastoral zone that are already open to pedestrians. I recently returned from South Tahoe where year after year diverse user groups have gotten together to plan, build, maintain and use trails to improve access and connectivity. They share these trails in a gracious and inclusive manner, as does everyone I see in Fairfax where I now live. I believe that the supposed hiker/biker/equestrian contention controversy in Marin is perpetuated by a very small, very vocal minority with outsized local media access to forward their own anti-cyclist agenda. They do not speak for me nor anyone that I know. Please consider cyclist safety and implement all of the recommendations of the Marin County Bike Coalition. 1. A new trail between Devil's Gulch and Platform Bridge through the Cheda, McIsaac, and Zanardi Ranches. 2. A plan to connect the Cross Marin Trail into Point Reyes. 3. Adoption of social trails off Bolinas Ridge for better connectivity and a single-track trail experience. 4. An extension of the Olema Valley Trail to Bolinas on the east side of Highway 1. 5. Gap closures for bikes through ranch lands in the park, including closing the Estero Trail loop, connecting Sir Francis Drake Blvd with Pierce Point Road, and connecting Marshall Beach to Pierce Point Road. 6. A more bike-friendly permit application process for road and mountain bike events in the park, including along Bolinas Ridge and out to the lighthouse. 7. Bike access to all ranch roads in the pastoral zone that are already open to pedestrians.

Best regards.

#1242

Name: Winkler, Andrew

Correspondence: Please upon up Bike access to all ranch roads in the pastoral zone that are already open to pedestrians.

The Mountain Biking Community has become a very tightknit community that understands they're just a percent of those that enjoy this open space. I'm totally committed to abiding by all the rules and respect all others that also enjoy this shared open space.

#1243

Name: N/A, Kerry

Correspondence: I oppose increased cattle ranching. I support plans that would manage Point Reyes for its native flora and fauna. It would be a true loss if the seashore was allowed to become a big ugly farm. Save the Tule Elk!
Thank you.

#1244

Name: Patterson, Carol

Correspondence: We oppose H.R. 6687, introduced by Rep. Huffman and Chairman Bishop. The bill would substantially erode the environmental integrity of Point Reyes National Seashore and cause significant harm to the native tule elk population there. It would undermine the National Environmental Policy Act (NEPA),

#1245

Name: Gaman, Tom

Correspondence: Regarding ranch management planning at Point Reyes, I feel most comfortable with Alternatives B or D, the management of the Drakes Bay elk herd and continued ranching for the next 20-40 years, but possibly at lower and less intensive levels with increasing adherence to Best Management Practices. I believe that, since there are no predators for either, artificial carrying capacities should be established for -both elk and cattle herds. These should reflect reduced and sustainable terrestrial, riparian and shoreline impacts. Secretary Salazar authorized 20-year ranch lease agreements and I support those too, with complete re-evaluation of the ranching program at some time in the future, perhaps 40 years out in 2060. Protection of rare flora and fauna and natural resources, native plant communities, and control of invasive species should continue to be major focus areas.

Forests do not cover much of the pastoral zone, but I would strongly support forest management in such a manner, perhaps via controlled or prescribed fire, that the park promotes forest health and reduces dry-season fire danger. The climate here is clearly changing and the new General Management Plan Amendment should consider adaptive management approaches that accommodate changing conditions. Also, public access is important for all lands. Recognizing their impacts, I do not support expansion of bicycle access to trails or use of motorized equipment. For hikers, I think it is important to require that ranchers, when install fences, to provide stiles or other access points at critical locations to reduce the necessity of climbing over the lengthy expanses of barbed-wire fences scattered around the Seashore. Thank you for the opportunity to comment.

Tom Gaman

#1246

Name: Loosli, Ed

Correspondence: Failure to protect and preserve free-roaming tule-elk herds in optimum numbers at Pt Reyes National Seashore would be a serious violation by the National Park Service of its own Mission Statement, which seeks to protect and sustain its natural resources as its number one priority.

The former ranchers have sold their valuable grazing lands to the U.S. Government over 30 years ago and there is no legal right that their heirs have to still be using this key wildlife habitat for their own private businesses. The current Lease Holders should not be given further Leases and the grazing lands they are now occupying, should be given over to restoring and expanding tule-elk range and other wildlife.

Being highly subsidized by the U.S. Taxpayers, the current Lease Holders are not only upholding the infamous name of "welfare ranchers" - at the the same time, they are also polluting and destroying what should be prime wildlife habitat.

No expansion of other ranching/farming uses should take place, in fact, all ranching, farming uses should cease at once.

#1247

Name: N/A, Susanna

Correspondence: It has come to my attention that a proposal to to allow access to bicycles on trails in Point Reyes Natl Seashore. I love the park and hike there often, especially since there are no bicycle riders there so that I can really relax and find peace and quiet in nature recharging my batteries from the hectic everyday life. I also hike on Mt Tam and Marin Open Space but it is not the same peacefulness and I definitively avoid places like China Beach State Park. Further very important that it is not safe for hikers and equestrians to share single track trails with bicycle riders. There are too many tall trees and bushes which make it very difficult to see a bicycle come around a curve. It is not relaxing and fun at all to always make sure and be very alert that there is no bicycle coming down the trail or around a blind curve. Also bicycles will affect the wildlife and birds to a greater extent due to their speed. The other concern is that bicyclists do major damage to the trails especially during the rainy season. I have

seen plenty of evidence of the ruts created on Mt Tam and Open Space trails. Point Reyes is a Wilderness area and it would really be a shame if the same happened in Point Reyes. Please do not change the rules. Thank you.

#1248

Name: N/A, N/A

Correspondence: NPS, I am extremely disappointed in the proposed action. I oppose any removal of Tule Elk from PRNS. The very existence of ranches on public lands is diametrically opposed to the purpose of national parks. Ranches on public lands should not be allowed to dictate policies relative to the management of wildlife. Additionally, allowing row crops as well as making provisions for more species of livestock is ill conceived and dangerous as these actions would increase conflicts with wildlife, and degrade wildlife habitat and water quality. Honestly, do nothing if we have to continue to lease to the existing farms / ranches but Alternative F provides the truest definition of a national park and what we expect from NPS. Sincerely, concerned local citizen & taxpayer

#1249

Name: Pincetich, Christopher

Correspondence: Thank you for the opportunity to provide public comment on the proposed alternatives for the General Management Plan Amendment (GMPA).

I support Reduced Ranching and Limited Management of the Drakes Beach Tule Elk Herd. I strongly support allowing ranchers to strictly adhere to previous agreements and therefore limiting and scaling back current impacts and operations. I strongly support the mission of the National Park Service to support wildlife and public viewing of wildlife, and support limited to no management of Tule Elk on ranchlands. I do support providing compensation of some sort to ranchers to offset the negative impacts of growing Tule Elk populations on the ranch operations.

Most all alternatives provide the information that "NPS would also identify additional compatible opportunities to improve the visitor experience in the planning area (e.g., enhanced trail connections, improved signage, and new interpretive waysides)."

I feel very strongly that PORE staff must use this planning stage of the environmental process to identify and analyze impacts for enhanced trail connections for narrow and wide multi-use trails with improved signage and new interpretive waysides throughout the GMPA management area. I am a local resident, professional environmental planner, biologist, education and interpretive contractor instructor at the Point Reyes National Seashore Association's Field Institute, avid hiker, father, and cyclist.

I propose PORE staff identify existing ranching roads and narrow trails and new trail connection opportunities to provide upwards of 100 miles of new multi-use trails that can be maintained in cooperation with ranchers and are not subject to the restrictions of the Wilderness Act. Many local organizations would gladly assist in this planning process and I encourage you to reach out to myself, the staff at Access 4 Bikes, and the Marin Bicycle Coalition. I feel strongly the following trail proposals should be included in the environmental analysis of the GMPA management area now to improve visitor experiences and improve the partnership with ranchers towards supporting visitor experiences aligned with recreational expectations of park visitors:

- 1) New off-road cycling trails (multi-use trails) be constructed or opened on existing facilities within the McIsaac Ranch to provide connectivity to the Bolinas Ridge trail and trails within State Parks on Mount Barnabe.
- 2) New off-road cycling trails (multi-use trails) be constructed or opened on existing facilities within N, M, H, and G ranches to connect the existing multi-use Estero Trail complex to extend north, across Sir Francis Drake Blvd. into and link access to the existing multi-use Abbotts Lagoon trail.

3) New off-road cycling trails (multi-use trails) be constructed or opened on existing facilities within M, L, K, and J ranches to provide a safer alternative to Pierce Ranch Roach for cycling access north from Sir Frances Drake Blvd. to reach the existing Duck Cove Road and Marshall Beach Road multi-use trails/dirt roads.

4) New off-road cycling trails (multi-use trails) be constructed or opened on existing facilities within M, N, O, A, B, C, D, E and F ranches to provide a safer alternative to Sir Frances Drake Blvd. for cycling access west to the Lighthouse. Visitor experiences at the Lighthouse would benefit from increased, safe access for cyclists to reduce congestion on existing roads and parking facilities.

5) New off-road cycling trails (multi-use trails) be constructed or opened on existing facilities within A, B, C, and D ranches to provide a safer alternative to Sir Frances Drake Blvd. for cycling access west from Drakes Beach parking lot to the existing multi-use trail at Chimney Rock. Visitor experiences at the Chimney Rock trailhead would benefit from increased, safe access for cyclists to reduce congestion on existing roads and parking facilities.

I will continue to advocate for these, and other, multi-use trail proposals throughout the GMPA process and recruit additional advocates for these goals. I strongly believe PORE staff must improve the partnership with ranchers towards supporting visitor experiences aligned with recreational expectations of park visitors, and the current system of trails fails to utilize the potential for ranching lands to support trails safe for cyclists, hikers, and other trails users. Hundreds of miles of trails exist in within San Francisco Bay Area public lands and parks have spring-loaded metal gates and other inexpensive structural features that allow cattle and trail users to share lands safely and responsibly. Expanding the public trails network into existing ranches through the GMPA process will provide increased opportunities for great partnership between ranchers and park staff where the ranchers can provide significant benefits to park visitor experiences with negligible impacts to their operations.

#1250

Name: Feist, Robert

Correspondence: I am opposed to expanding bike access in the Point Reyes National Seashore. I believe they already have sufficient areas to ride their bikes in Marin County. Any further expansion cannot be justified when weighed against the negative environmental impacts doing so would have on this wilderness area.

#1251

Name: Straus, Albert

Correspondence: November 30, 2018

RE: Comment to NPS 2018-11 EIS Public Scoping Document Point Reyes National Seashore General Management Plan Amendment and Environmental Impact Statement

Im submitting my comments regarding the Point Reyes National Seashore General Management Plan Amendment and Environmental Impact Statement. I believe that the National Parks, North Coast organic farmers and environmentalists should work together to identify permanent solutions that allow farming and ranching to continue within park boundaries and recognize these working farms positive contributions to our region.

Throughout the lifespan of the Park, privately owned dairy ranching has been a core activity in the fulfillment of the mission of the Park. The historic dairies and ranches represent over 100 years of farming activity. Today they remain important examples of working agricultural lands close to major urban areas where organic dairy and pastured meat products are core products in our regions foodshed. Removing these certified organic family-run operations, many of which are now home to fourth-and-fifth generation farmers would be another step towards eliminating modest-scale family farming in Northern California.

As the global threat of climate change increases, urgent action using all proactive tools is needed. The United Nations Intergovernmental Panel on Climate Change issued a dire warning in its October 2018 report,

[<https://www.ipcc.ch/report/sr15/>] estimating that avoiding permanent damage requires transforming the global economy at a speed and scale that has no documented historical precedent. Rather than shutting down sustainable and organic dairy and farming operations, leading scientists now view sustainable agriculture as a resource to fight climate change. For example, science on storing carbon in the soil [<http://advances.sciencemag.org/content/4/8/eaq0932?rss=1>] using land management methods is conclusive and is being practiced in West Marin by many organic farms and dairies in cooperation with the Marin Carbon Project.

As a lifelong West Marin dairy farmer, CEO and Founder of Straus Family Creamery, I have been at the forefront of innovation, building a replicable model for dairy farming that promotes cooperation on key issues including climate-smart organic agriculture, that stabilizes our regions small family farms and rural communities, and benefits the regions economy and local foodshed. Eliminating parks ranches and dairies would damage Marin Countys agricultural economy, of which 20% is within the park and 10% overall for the region.

My recommendations and observations follow in this letter, with issues and opportunities for the continuation of farming and ranching in the Point Reyes National Seashore explained below.

Additionally, we support the removal of the Tule Elk herd from the Pastoral Zone. Tule Elk thrive in 21 other herds throughout California parks, where they are effectively managed by the California Department of Fish and Wildlife. In Point Reyes National Seashore, the presence of Tule Elk, allowed to range unmanaged outside the designated Park Plan areas, is in direct conflict with PRNS mission and undermines federal requirements for organic agricultural practices on certified operations.

We call upon all concerned to work together to stop the fabricated division between farmers and environmentalists. Undeniably, we all care about protecting our treasured natural resources and maintaining both our historical and our innovative rural farming communities.

Issues and Opportunities

Ranches and Leases: 1. Lease periods should be 60 years or 20-year evergreen leases. 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.

2. Management by a non-profit third party of ranch leases to balance all interests and concerns and to ensure cooperative partnership between all agricultural operations in PRNS and the GGNRA.

3. End the conversion of farms to open-space by PRNS without a NEPA process and restore the process of NEPA when considering land use changes. For example, the Dunn Ranch should remain in farming and as affordable housing. Rural communities need more housing for families who work and live on surrounding farms and in the community, not only vacation rentals for wealthy tourists.

4. PRNS must work with local affordable-housing nonprofits to restore vacant housing within the park. PRNS has destroyed over 130 houses, both privately owned and for farm families, in the community to date. The Bay Areas housing crisis is a serious impediment to economic and social stability and will only worsen with this seasons wildfires. It makes no sense to destroy housing when working families have no place to live.

Best Management Practices: 1. 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. These 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.

2. Reduce climate change by working with farms in the park to implement organic farming sustainability practices such as carbon farming as actionable solutions. Encouraging best management practices for farms is now urgent. On November 23, the U.S. governments 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.

3. 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]

4. 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 Park

5. Allow diversification of sustainable farming practices. The regions economy needs small-scale farms to succeed, and diversification allows farmers economic stability and contributes to the regions food security.

Effective Management of Park resources: 1. Remove the Tule Elk herd from the Pastoral Zone entirely, whose presence in the Ag zone is in direct conflict with PRNS mission and undermines federal requirements for organic agricultural practices.

A full description of Straus Family Creamerys stance on Tule Elk in the Park follows. All free-range Tule elk should be removed from the Pastoral Zone and all farmlands in PRNS. Tule elk are a plentiful species in California, thriving due to a California Department of Fish and Wildlife (CDFW) reintroduction program that now measures 21 herds of approximately 3800 elk, a significant increase since 1970 when only three herds totaling 500 existed. According to CDFW, the elk reintroduction program has been a tremendous success. [<https://www.wildlife.ca.gov/Conservation/Mammals/elk>] The elk currently impacting ranching and dairy operations were never authorized to be in the area that they now occupy. We believe removal is necessary because their presence is in direct conflict with organic farming practices, making farming in our region less viable. Under the NOPs (National Organic Program) 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. [<https://www.ams.usda.gov/sites/default/files/media/NOP-UnderstandingOrganicPastureRule.pdf>]

Further evidence of the need to remove elk is that these animals destroy fences, reduce pasture for livestock that is essential to meet federal law requirements, and the elk injure livestock, causing even more direct conflict with agricultural operations. Straus believes the Tule Elk should be kept on the 18,000 acres set aside for them according to the 1998 PRNS Tule Elk Management Plan and Environmental Assessment. The other 21 Elk herds in California are managed effectively by the California Department of Fish & Wildlife (CDFW) and have no issues. PRNS must allow CDFW to manage the Elk in PRNS. 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.

2. Manage the coyote population in the Pastoral Zone to minimize livestock deaths. Because as currently unmanaged, coyotes endanger native species and permitted livestock.

In conclusion, we reiterate our support for the continuance of sustainable agriculture on working farms and ranches in the Point Reyes National Seashore. These farms are cornerstones of local food production, keep our rural communities stable, are beneficial to the environment, and honor our regions agricultural history.

Thank you for your consideration.

Sincerely,

Albert Straus CEO and Founder, Straus Family Creamery [www.strausfamilycreamery.com]

#1252

Name: Romander, Linda

Correspondence: As you consider revising the GMP for areas within PRNS and GGNRA, please do not cave in to the demands of off-road bicyclists. Bicycles should NEVER be allowed on multi-use public single-track trails for the safety and peace of mind of other users, and wilderness areas must remain off-limits to wheeled traffic for the protection of wildlife and safety of others.

Bicyclists already have access to a large percentage of trails in the areas under consideration. Additional access will continue to squeeze out users who seek a peaceful and relaxed experience, which is never attainable on multi-use trails.

The great majority of bicyclists are looking for speed and thrills, not a quiet and slow-paced experience in nature. If they observed the 15 mph speed limit at all times, slowing to 5 mph around curves and when approaching and passing other users, their presence might be tolerated and not a threat to equestrians and hikers. In my experience, however, this is almost never the case. Local high schools even have mountain bike teams that race on these trails! The Marin County Bicycle Coalition is asking for a "more bike-friendly permit application process for road and mountain bike events in the park . . ." I have to believe these events are actually races. Races of any kind do not belong in parkland on trails shared by other users.

Please maintain the current protection of trails and roads in PRNS and GGNRA and do not expand the availability of trails to bicycles, particularly in wilderness areas.

#1253

Name: Rufo, Maggie

Correspondence: Do not allow any killing of Tule Elk. No expansion of ranching, no more farm animal businesses allowed. The ranchers should be held responsible not to pollute, not to harm elk, or any other wildlife. Depredations are the responsibility of the rancher to protect, not the county or any other government organization. No depredation permits issued by CADFW for ranches that don't have all means of predator deterrents installed. Use some state funds to help ranches get proper protections in place for their animals. No chickens, no pigs, no lambs, no more than what is already there. The ranchers are not more important than the native Tule Elk.

#1254

Name: Loudermilk, Betina

Correspondence: Tule Elk are an important part of California's ecosystem and heritage. They should not be wiped out by lethal force when their numbers are no where near close to historic record. They are an amazing animal that has a right to coexist with humans. Leave them be.

#1255

Name: Arth, Amy

Correspondence: I worked on two small beef ranches, one in Idaho and one in Nevada, where I knew and lived with the ranching families. Further I am a veterinarian by training, practiced for almost 10 years, and have visited a few beef ranches and several more dairy operations in this capacity. So I have familiarity with beef ranching and dairy operations. Still, I do not believe that public lands should be utilized for private business, even if lands are leased for such purposes. The ranched lands are not accessible to those who own the lands (the public). Further,

the ranches are currently not natural landscapes, valuable ecological niches, or scenes of beauty. Thus the ranches do not benefit the owners (the public) in any way except provide a small leasing fee which is insufficient to pay for the cost of the land, the cost of managing the land, etc. One of the "elements common to all alternative actions" is preserve natural resources. Cattle and ranched cattle land are not natural resources. As much as I have enjoyed the ranching lifestyle and appreciate its inherent difficulties, I do not believe that ranching should be allowed on public lands. For these reasons I believe that the appropriate plan would be "No ranching and expansion of tule elk in the planning area." However, this should be done slowly (10 years is suggested) to give the ranchers time to find new ways of making a living and that would allow them to stay in the area (e.g. if they have kids in school) for awhile longer. Both beef and dairy operations should be ceased. There should be no new leases and current leases should be let to expire. Perhaps at the edge of the public land allowing BnBs could be considered for ranchers so they could continue to live in the area.

Also, I am 61 years old and mountain bike due to knee problems when hiking. Thus my purpose for mtn biking is to enjoy our great natural resources. I now understand the value of sustainable narrow trails which are the most compatible with natural habitats and encourage NPS to investigate having these types of trails in the planned area. Further, any trails open to horses should be open to mtn bikes since it has been repeatedly documented that mtn bikes do less damage to trails than horses. I fully support the proposed new and revised trails in the planning area that would be open to mtn bikes.

Thank you for considering my comments.

#1256

Name: Spaletta, James

Correspondence: We would like to see ranching continue in the Point Reyes National Seashore. Ranching has historically progressed for over a hundred years in this area. The land has supported many various agriculture activities while the park visitors have enjoyed the seashore. The ranchers have saved this land from development with the intention of continued ranching. The ranchers have taken care of the land and fed the world.

The Tule elk are part of the Point Reyes National Seashore and have areas provided for them to thrive. Wilderness areas were set aside for the Tule elk when they were introduced to the PRNS. This gave the elk a place to produce and live away from ranching areas so they would not interfere with ranching activities. The elk were not kept and managed in their designated areas.

We ask for the best alternative to maintain these important topics addressed in this EIS Public Scoping Documents:

Alternative C: Continued ranching and removal of the Drake's Beach Tule Elk Herd.

Thank You, Spaletta Families Valley Ford, Ca

#1257

Name: N/A, N/A

Correspondence: SAVE THE TULE ELK!

#1258

Name: N/A, N/A

Correspondence: SAVE THE TULE ELK!

#1259

Name: Ogden, George

Correspondence: The cattle should be removed from the National Park, not the Tule Elk. There are ample grazing lands privately available for dairy/meat cattle, while nowhere but publicly owned parklands are available for native wildlife.

#1260

Name: Goldeen, Rachel

Correspondence: Having read the various plan alternatives, I'm in favor of "ALTERNATIVE F: NO RANCHING AND EXPANSION OF TULE ELK IN THE PLANNING AREA".

The basis for my opinion is that there are 8 billion humans on the planet and only 5,700 tule elk. We humans are the invasive species and I'd like to see us leave more room for other species. In the United States, our National Parks are one of the few places where we are allowing a multitude of wild species to live and thrive. In these few areas, I feel that priority should be given to the wild species in favor of human activities.

Thank you for considering my opinion.

-Rachel Goldeen

#1261

Name: Luckoff, Michael

Correspondence: Over 50 years ago The Park Service wisely made a commitment to preserve agriculture in exchange for the sale of ranch land. This decision has subsequently saved this area from being developed and has resulted in this worldwide admired pastoral land.

Going forward in order to maintain this unique magnificent land and to further compliment the foresight of The Park Service it is imperative that the ranches be preserved as part of the cultural and historical heritage of Pt. Reed National Seashore.

Ranchers are the only land stewards with institutional knowledge of these resources and are known to regularly educating new PRNS staff about ranching and dairying. There must be and we urge the creation an Agricultural Advisory Committee.

The Park Service should rightfully encourage operational flexibility for the ranchers including the implementation of best management practices that have shown to sequester atmospheric carbon in rangeland soils. With the security of a longer lease would be in a better position make long range plans to take care of the cultural and extremely valuable natural resources..

Michael Luckoff President ABC Radio San Francisco-Retired Board Chairman Palace of Fine Arts Theater

#1262

Name: Coda, James

Correspondence: THIS SETUP IS TOTALLY INADEQUATE IN THAT IT DOESN'T ACCEPT PHOTOS. WHILE I HAVEN'T SUBMITTED EXHIBITS, I DOUBT IT WOULD ACCEPT THEM EITHER.

November 30, 2018 HAND-DELIVERED Superintendent Cicely Muldoon Point Reyes National Seashore 1 Bear Valley Road Point Reyes Station, CA 94956 Re: Request for Scoping Comments Dear Superintendent Muldoon: INTRODUCTION I am responding to your Notice of Intent and Invitation to Participate in the development of a General Management Plan Amendment (GMPA) and an Environmental Impact Statement (EIS) 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. 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.

SUMMARY OF THE IMPACTS OF RANCHING AND CATTLE GRAZING 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 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 endangered and threatened species. As for wildlife, some of the ways ranching and cattle harm or kill wildlife are as follows: overgrazing; using fencing that is not wildlife friendly; disposing of manure by spraying it on pastures which can infect elk and deer with Johnes disease;¹ pollution of streams and bays;² and the mowing of silage in the spring which kills any ground-nesting or near-ground-nesting birds. ¹ Johnes disease exists in some of the cattle herds in the seashore and, probably, the recreation area. It has been infecting the elk in the seashore since they were introduced. The Park Service should establish a rigorous program to eliminate Johnes disease, including testing and culling. See <https://johnes.org/general/control.html> ² 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 are not as well known. One example is Kehoe Creek discussed further below. ³ 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 or even four times (round trips) per day, and greater erosion due to cattle making those two to four round trips per day to and from the milk barn, especially when they travel through hilly areas and create deeply rutted trails on slopes. 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.

STATUTORY BACKGROUND Under the court settlement you are supposed to be conducting a public process under the GMP statute to objectively determine the best use of the 28,000 acres of lands used and controlled by the beef and dairy industries. There are at least five laws you must comply with during this planning process and thereafter. The first law is the GMP statute itself. It provides, in relevant part, as follows: § 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 areas resources³ ³ While § 100501 requires the GMP, the GMP statute also requires 5-year strategic plans, annual performance plans, and preparation of annual budgets as part of the annual performance plan. The budget shall include funding allocations for resource preservation (including resource management) [and other expenditures] and allocations into resource preservation (including resource management) [and other expenditures]. The statute also states that the strategic plans, performance plans and budgets shall be made available to the public. 54 U.S.C. § 100503. I personally made a written request dated January 3, 2018, for the most recent copy of each of these documents and stated that if I did not receive these documents within 30 days I would ³ *** 54 U.S.C. § 100502. (Emphasis added.) NPSs detailed administrative procedures for following the GMP statute requirements are at <https://www.nps.gov/policy/mp/chapter2.htm>. In doing so, you must adhere to the laws applicable to the two parks which require that the lands be managed first and foremost to protect their natural resources. You have ignored this since the first leases were issued decades ago. According to your planning procedures, a GMP begins with a Foundation Statement. The Foundation Statement - The planning process begins with the development of a foundation statement that is based on the parks enabling legislation . . . and that documents the parks purpose, significance, fundamental resources and values, and primary interpretive themes. It also includes any relevant laws . . . that apply to the national park system or the individual park unit. The foundation statement is generally developed early, as part of the public and agency scoping and data collection for the [GMP]&. ⁴ Directors Orders 2.2. (Emphasis added.) The GMP statute is not the only one that governs what you are doing during the GMP/EIS

process. The other law provides 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 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 assume they have never been done. I never received a response. 4 The quote indicates that the Foundation Statement is developed early as part of public scoping and data collection. Therefore, it should be available for public comment before the Draft GMP and EIS are released. 4 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. *** § 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 the 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. *** § 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 - 100707. (Emphasis added.) In summary, this statute requires you to do scientific research on the resources of the two parks, manage the parks using the highest quality of science and information and use the results of that scientific research in administrative decision-making such as you or the Regional Director will be doing here. NPSs detailed administrative procedures for following these requirements are at <https://www.nps.gov/policy/mp/chapter2.htm>. In addition to these two laws, there are three laws that govern how you manage these two parks on an ongoing basis. The first is the 1916 NPS Organic Act which applies to all units of the national park system, including PRNS and GGNRA. It provides as follows: § 100101 (a) In General- 5 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 other two laws are the PRNS statute and the GGNRA statute. The parts of those laws that control what you can do (and not do) going forward are relatively short. 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 16 U.S.C. § 459c-6. (Emphasis added.) 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 5 From the quoted language it is clear that NPS is required by law to manage the park in such a way as to not cause impairment of its natural values. The law goes on to make clear that even traditional uses of national parks, namely 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. 6 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.) These three laws make clear that your overarching management obligation is to protect the natural resources of these park units. While I think it is implied in all three laws, Congress even specifically ordered the maximum . . . restoration & of the natural environment in the seashore statute. While a Foundation Statement may contain more words, these three statutory provisions are the only words NPS is required to follow.

Ranching isn't required; it's discretionary.⁶ That means it can only be allowed to the extent it doesn't run afoul of the three statutes quoted above requiring protection of natural resources. Yet, ranching is extremely harmful to natural resources and that is prohibited by the three statutes. The Park Service has been ignoring these three statutes for as long as it has allowed ranching in the two parks. Finally, a word of caution. Your planning procedures define a GMP as follows: General Management Plan - This is a broad umbrella document that sets the long-term goals for the park based on the foundation statement. The [GMP] (1) clearly defines the desired natural and cultural resource conditions to be achieved and maintained over time; (2) clearly defines the necessary conditions for visitors to understand, enjoy, and appreciate the park's significant resources, (3) identifies the kinds and levels of management activities, visitor use, and development that are appropriate for maintaining the desired conditions and (4) identifies indicators and standards for maintaining the desired conditions. *** Implementation Plans - These plans provide project-specific details needed to implement an action in an area of a park and explain how the action(s) helps achieve long-term goals. *** When determining a plan's scope, it will be important to distinguish which issues can most appropriately be addressed by general management planning, and which 6 Where appropriate in the discretion of the Secretary, he or she may lease . . . subject to such restrictive covenants as may be necessary . . . 16 U.S.C. § 459c-5. 7 can be most appropriately addressed by more detailed strategic or implementation planning . . . Normally, NEPA analysis and public participation will be done at the general management planning level, when the overall direction for the park's future is decided, and again at the implementation planning level before funding and resources are committed to carry out specific actions . . . Directors Orders 2.2 and 2.3. (Emphasis added.) Based on the level of detail in your alternatives, you may be trying to make the GMP an implementation plan(s) as well. Unless your GMP is extremely detailed, it will not obviate the need to do ranch implementation/management plans and NEPA documents later.⁷ The question for this GMP is whether ranching should continue with all its impacts to natural resources or whether the land should be allowed to return to a natural condition.

DISCUSSION OF THE INTENT OF CONGRESS Before discussing your alternatives and impact topics, the record needs to be set straight on something. Some ranchers and supporters have made the baseless claim that Congress intended when the enabling legislation was passed in 1962 that ranching would always be part of what would become Point Reyes National Seashore. There is no truth to that. It is unfortunate that NPS has never sought fit to correct the record these misstatements. The 1962 legislation did not provide that ranching should always continue. Back in the late 1950s, the ranchers successfully opposed the establishment of the Seashore. The Park Service then came up with a plan to get rancher support. The plan was that to amend the bill to provide that NPS could only acquire the ranches if the ranchers were willing to sell. "No [ranch] shall be acquired without the consent of the owner so long as it . . . is used exclusively for ranching and dairying purposes . . ." 76 Stat. 540 (1962). With that amendment, the ranchers dropped their opposition to the bill and President Kennedy signed it into law on September 13, 1962. While some have claimed that that language showed Congress wanted ranching to continue forever, the only commitment was that there would be no condemnation of any ranches. The ranchers dropped their opposition because it left them in control so long as they continued ranching and didn't sell to developers. But the commitment was only for so long as the ranchers kept ownership of their lands. The choice was theirs. If they sold to NPS, then the land was to be managed in accord with all applicable national park management laws just like all other park lands were. There were no other parks with ranches in them operating on park lands. ⁷ I spoke with an NPS official at the November 15, 2018, Sausalito public meeting who said there will be a ranch management plan written for each ranch, but he did not think any NEPA document would be necessary. I told him I disagreed. I believe an EA would be required normally. ⁸ In 1978 Congress amended the PRNS statute to authorize the Secretary, for the first time, to lease land for ranching. That amendment didn't show Congress intended that ranching must continue. It simply authorized the Secretary to lease lands for ranching where appropriate in his discretion . . . subject to such restrictive covenants as may be necessary. It is totally discretionary and can only be done where it is not inconsistent with various laws the Secretary is bound by requiring protection of the natural resources of the national parks. One such provision is in the Seashore statute itself. It provides that the Secretary shall administer the Seashore "without impairment of its natural values." This section goes on to state that the Secretary is to manage the lands consistent with the "maximum protection, restoration and preservation of the natural environment within the area." 90 Stat. 2695. Those that have been pushing this intent campaign have gotten Rep. Jared Huffman to sponsor a bill that states that Congress intended that ranching would continue indefinitely. But there is no support for that. Those that have pushed this ranching forever campaign should have been more honest and simply pushed for a bill that provided that ranching would go on forever. It's like that CNN spot saying that a banana is, in fact, an apple. "But when they say it over and over and over again, and people start to believe it, it's only a matter

of time until someone gets hurt. CNN. That's what is going on with the Huffman bill. DISCUSSION OF ALTERNATIVES Alternative A: Continue Current Management (No Action) Technically, this is not a no action alternative. No action would be to not issue any more leases or permits. That was what you did in the oyster case. You took no action to give Drakes Bay Oyster another lease. Here you would be granting leases or issuing new permits as you have done for 50 years so it is not no action. You state that existing ranch operations would be continued under five and ten year permits and that resource protection buffers would be established on a case-by-case basis.⁸ Identify and map the location of every buffer on every involved ranch⁹ and discuss the impacts, good and bad, to the environment due to that buffer. ⁸ Establishing buffers is another reason why this is not no action. ⁹ I was told at your November 15, 2018, public meeting in Sausalito that this EIS would be the only time NEPA would be involved in the implementation of what is covered by this GMP. As stated a few pages above, that depends on whether this EIS will cover in adequate detail all that will be involved in the granting and use of each lease. My comments will assume that to be true. However, if you plan to do further plans, such as ranch management plans, and make further site-specific decisions, you will be legally required to do further NEPA documents as to anything not adequately covered by this EIS, such as site-specific proposals that have impacts not addressed here. ⁹ You state that you would continue to monitor resource conditions, including vegetation, water quality and ranch infrastructure. Discuss what monitoring has been done on a ranch by ranch basis and the current resource conditions on every ranch, including whether conditions are improving, deteriorating or staying the same. You state you would work with ranchers to implement BMPs to protect sensitive resources, including water quality and rare and endangered species. Discuss the extent to which, if at all, you have worked with ranchers to implement such BMPs in the past on a ranch-by-ranch basis and the results of any such BMPs. You state you will work with ranchers to monitor and manage invasive non-native vegetation. Discuss to what extent NS has worked with ranchers in the past to do so. Discuss the extent of native and non-native vegetation on a ranch-by-ranch basis today. Discuss your plan to remove non-native vegetation from the pastoral zone and the time frame to meet any plan objectives. You state you would conduct residual dry matter (RDM) monitoring each fall to assess levels of grazing use. Discuss whether RDM monitoring has been conducted on each ranch for each of the past 10 years. Discuss how monitoring sites are chosen to be truly representative of the condition of each ranch because it is likely that some areas will be more lightly grazed than other areas and monitoring those areas would bias the results. Discuss whether there are any other methods for assessing levels of grazing use and the merits of each compared to RDM. Discuss whether RDM monitoring is the only method used in the industry to assess and set grazing levels. If other methods are used please describe them and explain why they are not being used at PRNS. In this discussion, please address using the USDA Soil Survey method and data base which is standard in the industry to determine the number of sustainable animal units (AUs). You state that consistent with current practices, management of free-range elk affecting park ranch lands would be limited. You go on to state that you would continue efforts to prevent damage to ranches and that current actions that could be carried out in the future include fence repairs, habitat enhancements, pasture offsets and hazing. ¹⁰ Discuss what you mean by damage to ranches. If by that you mean elk eating grass, discuss why ranchers are entitled to all the grass and other edible plants and elk and other wildlife are not apparently not so entitled. Discuss whether you allocate forage to elk and other wildlife and if not, why not. Discuss, if you allocate forage now or will in the future how you determine how much to allocate to cattle and wildlife. Discuss the nature of the fence repairs and whether fences built and maintained as wildlife- friendly fences, as opposed to current fences, would reduce the number of fences being broken by wildlife and causing injury to wildlife. Discuss why NPS shouldn't be the party responsible for all fencing construction and maintenance along the perimeter of every ranch. Discuss what you mean by pasture offsets and why they are necessary to consider. Discuss whether hazing is necessary or appropriate in a national park. Discuss whether elk are allocated any forage on any ranch they exist on and if not, why not, given that you are required by your PRNS statute to manage the seashore for the maximum protection, restoration and preservation of the natural environment of the area. Elk are included in that phrase. Cattle are not. You state that current monitoring of elk in the pastoral zone, the Limantour area and Tomales Point would continue and you would continue to perform testing for Johnes disease and chronic wasting disease (CWD). Discuss, with respect to monitoring the Tomales Point herd, why you continue to keep those elk locked up behind an 8-foot fence when your 1998 elk study found that the water there was insufficient in drought years, especially given that 250 elk died there from lack of water in the recent drought. Discuss why it is necessary and/or appropriate to keep testing elk for Johnes disease when you never test the cattle which were the original source of the disease and, apparently, continue to spread it, especially through the practice manure spreading, to elk and deer. Discuss a testing program to get rid of Johnes disease in the cattle herds and the elk herds which would thereby restore the pastoral area to

the healthy environmental condition it was in before infected cattle arrived. Discuss why NPS never sought damages from the rancher at Pierce Point Ranch whose cattle gave the elk Johnes disease in the 1970s. 11 Discuss the relative threat of CWD. Discuss, to the extent you have not done so already, this alternatives environmental impacts to natural resources including, but not limited to, air, water, soils, vegetation, visitor use and wildlife, including listed species and elk. Alternative B: Continued Ranching and Management of the Drakes Beach Tule Elk Herd (NPS Proposed Action) You state that the proposed action is [b]ased on the purpose and need for action. This shows a bias in favor of continued ranching before even doing any studies of the impacts of ranching or considering public comments or writing the draft GMP and EIS. You are effectively blocking other alternatives for consideration because you dont say the others are in furtherance of the purpose and need for action. The three alternatives you agreed to consider in the settlement are introduced not as based on the purpose and need for action, but as required by the [Settlement] Agreement. Discuss why you believe the proposed action is the only alternative that meets the purpose and need for the GMPA and EIS. You state you would issue 20-year leases; explore opportunities for ranch operational flexibility and diversification; establish 900 acres of resource protection buffers; and provide a programmatic review of best management practices. Id. Discuss what kind of operational flexibility you would consider and what the environmental impacts of that would be. Discuss what kinds of diversification you would consider and what the environmental impacts of that would be on a domestic animal versus wild animal basis. Do the same with row crops. Personally, I am opposed to any diversification because any and all diversification is likely to adversely affect current natural resource conditions which you have a legal duty to protect. Furthermore, Congress never intended that any cattle ranching would continue long term, let alone that animals other than dairy cows and beef cattle would be allowed. Identify, map and discuss where those buffers would be located and the environmental effects, positive and negative, as to each buffer. Discuss whether, in light doing of a programmatic review of BMPs, you intend to develop site-specific BMPs on a ranch by ranch basis and whether you intend to do appropriate NEPA documents as to those BMPs. 12 You state you would implement a conservation framework on ranch lands (described on page 10 as Land Management Units (LMUs)), namely ranch core, pasture and range, which would allow for different intensities of land use.10 Discuss how these different levels of intensities of land use will comply with your duty to provide maximum protection, restoration, and preservation of the natural environment within the area as required in the seashore statute and your administrative policies regarding resource management. You state that you will minimize elk-related impacts to ranch operations through hazing, fence repair and modification, water development, habitat improvement, and other measures as appropriate. Discuss why you would manage elk to have as little impact on ranching as possible instead of managing ranching to have as little impact on elk as possible when you have a statutory duty to protect, restore and preserve the elk, but not the business of ranching. Discuss why you would develop water projects and habitat improvement projects to benefit the wild, free-roaming Drakes Beach elk herd when your wildlife management policies are to let nature take its course, but you will not do such things to benefit the captive elk at Tomales Point which do not have adequate water and, because they are captive, are not able to roam free to find adequate water. You state that the Drakes Beach elk herd will be managed at a level compatible with authorized ranching operations. Discuss why you will manage elk numbers at a level compatible with ranching instead of managing ranching at a level compatible with elk, given your duty to protect, restore and preserve elk. You state that you will manage the Drakes Beach elk herd at between 100 and 160 animals, following guidance from CDFW, and that you would use translocation outside the park, if practicable (I assume when you say if practicable you are referring to the fact that some elk have Johnes disease (which is a difficult to detect, fatal and communicable disease they got from the cattle). You state if translocation isnt practicable, you would shoot them. Discuss whether you do now or would in the future allocate a certain amount of forage to the Drakes Beach herd based on the territory it inhabits, including any ranches they roam. Discuss how you would decide how much forage to allocate to elk versus cattle. 10You discuss this framework in some detail on page 10 of your invitation to participate and I will respond to it in a separate part of this letter. 13 Discuss whether predators are an option for controlling numbers. You discussed in the Comprehensive Ranch Management Plan under the topic of elk population control that wolves and grizzly bears were potential predators, but that for various reasons they were not feasible for PRNS. However, you did not discuss black bears which are also predators of elk, especially young calves. They exist nearby and are not as problematic as wolves or grizzly bears would be. Discuss black bears as a population control option. Discuss, to the extent you have not done so already, this alternatives environmental impacts to natural resources including, but not limited to, air, water, soils, vegetation, visitor use and wildlife, including listed species and elk. Alternative C: Continued Ranching and Removal of the Drakes Beach Tule Elk Herd You state that under this alternative ranching would continue and the Drakes Beach elk herd would be

translocated or shot. You do not mention ranch operational flexibility or diversification. You also do not mention implementing any conservation framework involving a ranch cores, pastures or ranges. To the extent you meant to include those factors, I incorporate my points for you to discuss from Alternative B. This alternative appears to be similar to Alternative B, except all elk would be translocated or shot. Since an unknown number of elk are infected with Johnes disease (which they got originally from PRNS cattle) and because it is almost impossible to be certain whether an individual elk is disease-free, it is unlikely that any elk could be translocated. Therefore, all of them would, presumably, be shot. Discuss how translocating or, more likely, shooting the entire Drakes Beach herd of approximately 150 wild, free-roaming elk is consistent with your duties under the three management statutes above and your policies for wildlife management. Discuss, to the extent you have not done so already, this alternatives environmental impacts including, but not limited to, air, water, soils, vegetation, visitor use and wildlife, including listed species and elk.

Alternative D: Reduced Ranching and Management of the Drakes Beach Tule Elk Herd You state that this alternative is required by the [Settlement] Agreement. That is true. However, it is sad to see that the Park Service at Point Reyes is so afraid of the pro-ranching, anti-park sentiment in West Marin that the park is essentially saying this wasnt my idea. The lawsuit settlement made me write this alternative. This shows bias. 14 You state you would reduce ranching by 7,500 acres, thus leaving 19,500 acres in continued ranching. You go on to state you chose the 7,500 acres because it causes the least harm to the Historic Dairy Ranching Districts. It would be more accurate to say it would cause the least harm to ranchers who live inside these national parks. Discuss why you did not choose, instead, to close the areas of the pastoral zone which would have been most beneficial to natural resource concerns or values, including elk. Discuss in what ways the 7,500 acres that would cease being used for ranching would benefit the environment. Discuss the carrying capacity for tule elk if all cattle were removed from all lands on the Point Reyes Peninsula that are not occupied by ranchers (all lands between C Ranch and G Ranch). You do not mention ranch operational flexibility or diversification. You also do not mention implementing any conservation framework involving a ranch cores, pastures or ranges. To the extent you meant to include those factors, I incorporate my points for you to discuss from Alternative B. You state that elk would be managed consistent with the actions described in the proposed action, but under population targets commensurate with the level of ranching operations in this alternative. You state that if additional herds form, they would be allowed. Discuss why you would make management decisions about elk based on what is good for ranching which you have no statutory duty to protect and preserve rather than elk which you do have a duty to protect and preserve. Discuss, to the extent you have not done so already, this alternatives environmental impacts to natural resources including, but not limited to, air, water, soils, vegetation, visitor use and wildlife, including listed species and elk.

Alternative E: No Dairy Ranching and Limited Management of the Drakes Beach Tule Elk Herd You state that this alternative of no dairy ranching is required by the settlement. Again, it is sad to see that the Park Service at Point Reyes is so afraid of the pro-ranching, anti-national park sentiment in West Marin that the park is essentially saying this wasnt my idea. The lawsuit settlement made me write this alternative. This shows bias. You state that the dairy ranches would be allowed to convert to beef cattle. Discuss the benefits, on a ranch by ranch basis, of how stopping dairy farming would benefit the environment. 15 You state that you would take no action to limit elk population growth and limited action to manage the geographic extent of all wild, free-roaming elk, but only where management is needed to support other resource protection and park goals. If additional herds form, they would be allowed. Discuss why you would take no action to limit elk population growth and limited action to manage the geographic extent of all wild, free-roaming elk, but only where management is needed to support other resource protection and park goals. Discuss why, if additional herds form, they would be allowed. Discuss why you would manage elk less intensively on beef ranches than dairy ranches. Discuss, to the extent you have not done so already, this alternatives environmental impacts to natural resources including, but not limited to, air, water, soils, vegetation, visitor use and wildlife, including listed species and elk.

Alternative F: No Ranching and Expansion of Tule Elk in the Planning Area. This is really the no action alternative because if you dont grant any more leases and you leave the elk alone you will have not taken any action. Its also the best alternative from an environmental standpoint. If you choose this alternative there would be no reason to keep the Tomales Point herd locked up which would avoid the next large die-off with the next drought. Point Reyes National Seashore would become the crown jewel of the States 22 tule elk herds. The herd could expand to become the largest in the State by far. Point Reyes would become synonymous with tule elk. That would be something park management could be proud of. You state, that this alternative of no ranching is required by the settlement. Again, it is sad to see that the Park Service at Point Reyes is so afraid of the pro-ranching, anti-national park sentiment in West Marin that the park is essentially saying this alternative wasnt my idea. The lawsuit settlement made me write this alternative. This shows bias.

Discuss the carrying capacity for tule elk if all cattle were removed from PRNS. Discuss the carrying capacity for tule elk if all cattle were removed from GGNRA. Discuss, to the extent you have not done so already, these alternatives environmental impacts to natural resources including, but not limited to, air, water, soils, vegetation, visitor use and wildlife, including listed species and elk. Proposed Additional Alternatives (Additional) Alternative G: No Dairy Ranching and no Replacement of Dairy Cows with Beef Cattle 16 Removing All dairy cattle with no replacement with beef cattle and returning those lands to a natural state would not only greatly improve natural resources conditions, but it would also resolve the elk issue because the elk are mostly on lands the dairy ranches lease. Discuss the environmental impacts of this alternative. (Additional) Alternative H: Combine Alternatives D (Reduced Ranching) and E (No Dairy Ranching) with Elk Management As Per Alternative E Reducing ranching by the 7,500 acres of Alternative D and replacing dairy cows with beef cattle as described under Alternative E (including managing the elk as described under Alternative E) would reduce cattle impacts without forcing any ranchers to move and would remove the much greater extra environmental impacts caused by dairy operations. Discuss the environmental impacts of this alternative. COMMENTS RE A CONSERVATION FRAMEWORK This framework is nothing more than a plan to sacrifice 30% of the 27,000 acres of ranch lands to more development than has occurred in the past. These lands will be invariably managed without regard to the several laws that require you to protect natural resources, not further degrade them. You state that [b]ecause certain practices or activities would be authorized for specific LMUs, the framework accommodates greater operational flexibility for the park ranchers while protecting park resources. This seems to be saying ranchers will get to do all sorts of things impacting 30% of the 27,000 acres, but 70% of the 27,000 acres of natural resources will be protected from some of ranchings harms and that is all good. No, its not and its contrary to your park management laws and policy. You ignore the fact that ranching at PRNS and GGNRA, as it has been conducted in the past and will be conducted in the future, is contrary to the laws that govern management of these and all national parks. Discuss all the environmental impacts (including, but not limited to, air, water, soils, vegetation, visitor use and wildlife, including listed species and elk) to pasture lands on a pasture by pasture basis. You state that pasture lands will be comprised of introduced or domesticated native forage species. Discuss what introduced or domesticated native forage species are. Discuss how introduced or domesticated native forage species compares with native vegetation discussed under the Range LMU. 17 Discuss how your pasture LMU complies with your duty to manage all park lands in an unimpaired state and in accord with the seashore language about protecting, restoring and preserving natural resources. You state that [a] suite of pasture management activities, including seeding, mowing, (which we assume includes silage mowing) and nutrient management, would be considered for use. Discuss, whether approving silage mowing, which kills some ground nesting birds, near-ground nesting birds, mammals and possibly reptiles and amphibians, complies with your duties under the three park management laws described at the beginning of this letter. Discuss whether approving and conducting silage mowing, which kills some ground nesting and near-ground nesting birds, complies with the Migratory Bird Treat Act and the Endangered Species Act. You state that for dairies, manure management (spreading or spraying liquified manure on fields) would be authorized. Discuss whether any dairy cattle at Point Reyes have, or may have, Johnes disease. Discuss whether any beef ranches in the 27,000 pastoral zone have cattle with Johnes disease as was the case with the beef ranch at Pierce Point when the elk were delivered to Pierce Point Ranch in the late 1970s. Discuss what Johnes disease is, including how long it is capable of living on the ground. Discuss whether such practice of spreading liquified manure could spread live Johnes disease bacteria onto the fields where it is spread. Discuss whether mammals such as cattle, elk and deer can get Johnes disease from eating forage that has the Johnes disease bacteria on it. Discuss whether the calves of cattle and elk and the fawns of deer can get Johnes disease from suckling mothers that have Johnes bacteria on their breasts. Discuss why you havent taken steps to get rid of Johnes disease in PRNS and GGNR. Discuss whether it would be appropriate to not allow manure spreading by any diary whose cows have not been determined to be free of Johnes disease. You state that Pasture LMUs may be refined further under individual ranch plans. 18 Discuss whether you will prepare a ranch management plan for each ranch before you make a decision on each lease or permit. Discuss whether you will prepare an appropriate NEPA document for each ranch plan and lease or permit. You state that under some alternatives certain livestock diversification and silage [growing and cutting] could occur in the pasture LMU. (Emphasis added.) Livestock diversification. You should not allow any livestock diversification in the pasture LMUs (or anywhere else, including the ranch core). Any livestock smaller than the present cattle will attract native predators to prey on such livestock. That will cause pressure to kill the predators. Guard dogs are not an answer. They may kill the predators and will reduce their use and habitat areas/territories to the extent guard dogs and smaller livestock roam. Discuss whether, if diversification is allowed and animals such as sheep and goats are

allowed, they could get Johnes disease and spread it to their young if they eat forage and lay down on land with the Johnes bacteria on it. Discuss whether diversification will be covered in ranch management plans where it has been proposed. Plant diversification. While not mentioned like livestock diversification was, you should not allow any plant diversification either. Depending on what is grown, it will attract some wild animal life, big, small or microscopic, to eat the plants. That will require pesticides etc. Plus, the acreage devoted to growing crops reduces wildlife habitat/territory commensurably which reduces their numbers. Pesticides have the potential to enter groundwater and wells. Discuss whether diversification will be covered in ranch management plans where it has been proposed. Silage growing. You should not allow any silage growing because it invariably leads to killing birds. That should be reason enough for you to not allow it. Plus, you have statutory duties to protect, preserve and restore natural resources, including birds. Furthermore, it violates the Migratory Bird Treaty Act and, where protected species are involved, it violates the Endangered Species Act. It would seem that an NPS official who authorizes the growing and mowing of silage, which is known to kill migratory birds, would be as guilty of violating these laws as the one driving the mower. Discuss why you would authorize an activity that kills wildlife, which you have a statutory duty to protect, and violates the Migratory Bird Treaty Act and possibly other laws. A violation of the MBTA is punishable by a fine of up to \$15,000, imprisonment for up to six months or both.

IMPACT TOPICS TO BE ANALYZED IN DETAIL IN THE DEIS

19 Air Quality and Greenhouse Gas Emissions Discuss the impact on air quality and global warming of the dairy and beef cow ranching operations in PRNS and GGNRA. Discuss what NPS has done to improve air quality and reduce greenhouse gas emissions in the pastoral zone. Cultural Landscapes, Historic Districts, and Historic Structures Discuss how the dairy farms in these two parks are different from an historic standpoint from other dairy farming areas in the United States. Discuss or list how many other historic dairying districts exist in the United States. Discuss how many of those are on the National Register. Discuss whether their status as historic dairy districts requires that they be operated in perpetuity as the working ranches they are today. Federally Listed Species Identify and map all habitats for wildlife and plants listed under the federal and state Endangered Species Acts as endangered, threatened or a species of special concern, as well as protective buffers needed to maintain ecological function for their suitable habitat. Identify all designated critical habitat for federally listed species at PRNS and GGNRA and where ranching leases overlap or runoff drains into critical habitat. Identify where ranching and dairying activities overlap with habitat for state listed species. Discuss which ranching and dairying activities and uses within the ranch leases areas conflict with or support providing maximum protection for sensitive species or their critical habitat. Discuss which ranching and dairying activities and uses within the ranch leases areas are compatible with or conflict with protection and recovery of federally listed species. Discuss any adverse or potentially significant impacts (under NEPA) from ranching activities on designated critical habitat for any federally listed species. Discuss what limitations or mitigation measures are needed for ranching activities that conflict with protection of listed species.

20 Identify where removal of important habitat areas from the designated pastoral zone is needed to protect listed species. Identify where exclusionary fencing is needed to protect sensitive habitats for listed species from livestock. Identify where reduced stocking levels of livestock in overgrazed areas is needed to protect listed species. Identify where a prohibition on silage and mowing is needed to protect sensitive species. Identify where removal and control of invasive species is needed to protect sensitive species.

Socioeconomics Discuss and compare the extent to which visitors come to PRNS and GGNRA to enjoy the natural resources, including the wildlife, versus the ranches and cattle. Discuss the economic benefit to the local community of those that come to recreate versus those that come to visit the ranches.

Soil Processes, Erosion and Compaction There is a tremendous amount of trailing/gullying being caused by cattle walking in areas that are too steep. This causes severe erosion, which is greatly exacerbated by rainwater runoff. These areas need to be repaired. Cattle should be excluded from areas where their travel causes any gullies and erosion. // // **21** Below is a photo showing severe erosion from cattle trailing on the left side of Pierce Point Road on the J Ranch. **22** Below is a photo showing further trailing on the J Ranch. These dairy cow trails are causing soil loss and severe siltation and pollution from manure to Tomales Bay, which is at the bottom of these two steep areas. **23** Below is a photo evidencing severe trailing or gullying and consequent erosion on the south/left side of Sir Francis Drake Blvd. on the E Ranch. **24** Below is a photo 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. 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 PRNS and GGNRA and, presumably, such trailing also exists all over PRNS and GGNRA, not just close to these two roads where the gullies were easy to see and photograph. Discuss what causes these gullies. Discuss what efforts, if any, NPS has taken to remediate these

gullies. Discuss why they still exist. Discuss why NPS hasnt excluded all cattle from these areas. Tule Elk and Associated Habitat Discuss how much the average tule elk weighs and how much forage and water it needs per day. 25 Discuss how much the average milk cow weights and how much forage and water it needs per day. Discuss how much an average beef cow weights and how much forage and water it needs per day. Discuss how much forage NPS allocates to milk cows and beef cows. Discuss how much forage NPS allocates to the average elk where they exist on ranches. Discuss the basis for each of these allocations. Discuss the Park Service fence policy for the two parks to the extent one exists. Discuss why the Park Service doesnt build and maintain all the permanent fencing on its pastoral lands. Discuss why NPS hasnt set a fencing standard for all fences in the pastoral zone. Discuss why NPS doesnt require that all fending to be wildlife-friendly, like BLM and the Forest Service do for areas where elk exist. Discuss the suitability of the environment (soil, plant life, water, etc.) for elk at Drakes Beach and compare it to the environment for elk at Tomales Point. Vegetation (including communities of concern and non-native plant species) Discuss how NPS justifies its pasture management position under its LMU framework without making an effort to restore such lands to a native condition under its statutes to avoid impairment and to protect, preserve and restore the natural resources of the two parks. Visitor Use, Experience, and Access Discuss how NPS can justify committing 27,000 acres of public park lands to private ranching which makes them of little or no use to visitors. Water Quality There is far too much water pollution occurring at Point Reyes and GGNRA due to cattle, especially dairy operations. Leaks from farm septic tanks may also be contributing to the problem. The Park Services own 2013 Coastal Watersheds Assessment shows that aquatic habitats have been at severe risk for years. To quote from part of the report dealing with water quality: 26 Conductivity/Specific Conductance Conductivity, the ability of a solution to pass an electric current, is an indicator of dissolved solids and can be influenced by the geology of an area as well as urban runoff. Ideally, streams should have conductivity between 150-500 $\mu\text{S}/\text{cm}$ to support diverse aquatic life (Behar 1997). *** PORE: In PORE and northern GOGA, median specific conductance measured for 1,014 samples from 1999 to 2005 is 278 $\mu\text{S}/\text{cm}$ with an IQR from 181-370 $\mu\text{S}/\text{cm}$. Figure 61 shows the specific conductance maxima at PORE monitoring locations and compares values to 850 $\mu\text{S}/\text{cm}$ and 1,700 $\mu\text{S}/\text{cm}$. Values higher than 1,700, indicating severe pollution, occurred at dairy locations, including North Kehoe Creek (PAC2A), at the J Ranch and K Ranch property line (PAC2B), the L Ranch Impact Yard (PAC1B), the A and B Ranches (DBY3, DBY2) and the McClures 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.11 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 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. 11 The Assessment and other sources also discuss other areas of Point Reyes and GGNRA that are suffering serious pollution for ranching, including Abbots Lagoon, Drakes Bay, Tomales Bay and Olema Creek. 27 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 cant 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.12 Raising Beef Cattle for Dummies, Nikki and Scott Royer, at 125-26. Fencing cattle out of ponds isnt only good for the cattle, as the Royers state, but also for any watercourse its a part of. As with most ponds, the pond shown above was created by 12 In addition to gravity, pond water can be moved to tanks using electric and solar power. 28 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 arent impervious though. The water in this pond eventually drains down elevation and some of it fills a pond down elevation from it. Below is a photo 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, to the Pacific Ocean. 29 Here are two beef cows from the K Ranch feasting on 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 (along with fecal material) 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 where it is. 30 Below is a photo 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 wouldnt cover the pond if excessive nutrients in the form of manure werent getting into the watercourse. The water then flows under the road (presumably via culvert and, during heavy rains, over the surface of the road) at the Kehoe Beach parking lot and, ultimately, to 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. Discuss what studies have been done since the 2013 Assessment regarding water pollution in the ranching areas. Discuss the current water quality of all waters (the ocean, the bays and all creeks (including ponds that are part of watercourses)) affected by ranching in the two parks. Discuss how that water quality compares to the water quality findings that the 2013 Assessment is based on. 31 Discuss, for those waters that have not significantly improved from the severely polluted condition they were in, why that is so. Discuss, if water quality hasnt significantly improved, why cattle numbers havent been reduced to the extent necessary until satisfactory water conditions return. Discuss why, if water quality hasnt significantly improved, ranchers shouldnt be required to pay for the total cost of remediation. Wildlife Incorporated herein by reference are all my comments on elk and other wildlife above. To the best of my knowledge, NPS has never discontinued ranching in PRNS or GGNRA for the benefit of wildlife. Discuss why NPS has always authorized ranching when it negatively impacts natural resources such as air, water, soils, plant life and wildlife, including elk, all of which NPS has a legal duty to preserve and it has no such duty to preserve or foster private ranching in these two parks. As stated above in my Discussion of the Intent of Congress, Congress did not intend that ranching always continue at PRNS and GGNRA. Ranching is completely discretionary¹³ on the part of NPS and it also has a statutory duty to make sure its decision-making doesnt impair natural resources. Wildlife-friendly fencing. 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. Unfortunately, to the best of my knowledge, none of the fencing in the parks is wildlife friendly. Here is an article 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 with their hooves facing forward, as they normally do). Fencing Manual at IV-4 and IV-5. [https://www.google.com/search?q=blm manual fencing 1v-4&rlz=1C1CHBF_enUS805US805&oq=blm manual fencing 1v-4&aqs=chrome..69i57.13579j0j7&sourceid=chrome&ie=UTF-8](https://www.google.com/search?q=blm+manual+fencing+1v-4&rlz=1C1CHBF_enUS805US805&oq=blm+manual+fencing+1v-4&aqs=chrome..69i57.13579j0j7&sourceid=chrome&ie=UTF-8) Discuss why NPS hasnt required all fencing in PRNS and GGNRA to be wildlife-friendly. 13 Where appropriate in the discretion of the Secretary, he or she may lease . . . subject to such restrictive covenants as may be necessary . . . 16 U.S.C. § 459c-5. 32 Discuss the Park Service fence policy for the two parks if a policy exists. Discuss why the Park Service doesnt build and maintain all the permanent fencing on its pastoral lands. Discuss why NPS hasnt set a fencing standard for all fences in the pastoral zone. Discuss why NPS doesnt require that all fencing to be wildlife-friendly, like BLM does (and the Forest Service does) for areas where deer or elk exist. Black bears as predators. In its discussions and writings regarding a Comprehensive Ranch Management Plan, NPS discussed predation as a means of controlling population numbers of elk. While wolves and grizzly bears were mentioned, they were dismissed as not feasible. Black bears were not discussed, but they are feasible. They are feasible in that they exist nearby (Mendocino County, Sonoma County, and possibly Marin); are known predators of elk calves as discussed below; and they

would be far less controversial than wolves and grizzly bears. Black bears, the most frequent cause of death, killed at least 10 of 98 (10%) of the radiomarked calf elk and accounted for 40% of the total summer mortality.

<https://scholarworks.umt.edu/cgi/viewcontent.cgi?article=7525&context=etd> The primary cause of death for calves across all years was black bear predation (57 of 140 non-anthropogenic mortalities).

[https://www.researchgate.net/publication/314079225_Predator-](https://www.researchgate.net/publication/314079225_Predator-prey_relationships_between_rocky_mountain_elk_and_black_bears_in_northern_New_Mexico)

[prey_relationships_between_rocky_mountain_elk_and_black_bears_in_northern_New_Mexico](https://www.researchgate.net/publication/314079225_Predator-prey_relationships_between_rocky_mountain_elk_and_black_bears_in_northern_New_Mexico) Black bears are known to successfully prey on elk calves. Smith and Anderson (1996) reported that 22 of 145 radio collared calves died before July 15 from 1990 to 1992; black bears were responsible for 11 of these mortalities. During the late 1990s black bears were responsible for 16 of 42 calf deaths (B. L. Smith, pers. comm. 2003). In a north-central Idaho study, black bears killed 38 of 53 marked calves or 72% (Schlegel 1976).

[https://www.fws.gov/bisonandelkplan/Final EIS/Volume 1/5_Chapter_3_Affected_Environment.pdf](https://www.fws.gov/bisonandelkplan/Final%20EIS/Volume%201/5_Chapter_3_Affected_Environment.pdf) Discuss black bears as a feasible predator of elk and therefore an option for regulating elk population numbers. Additional Impact Topics to Be Discussed in the DEIS Diversification Allowing any livestock on these ranches smaller than cattle, such as pigs, sheep, goats, as well as free-roaming turkeys, chickens, geese, ducks etc. 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. 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. Allowing the planting of row crops will also cause problems to 33 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 artichokes¹⁴ and certain other crops are grown and which may then enter the groundwater of the park.¹⁵ Any other diversification ideas are also contrary to the three statutes set forth above. Discuss all possible impacts, direct and indirect, to wildlife and other natural resources for the various diversification possibilities. Fair Rental Amounts for Leases The park has been leasing the ranches at well below fair market rental value. That is unlawful. Federal officials have an obligation to collect fair market value for all federal assets. The difference between fair rental value and actual lease amount constitutes an unauthorized gift by the federal official who signs each lease. You should be obtaining the same rent amount as comparable ranch lands rent for outside the parks. The rationales the seashore has been using for subsidizing ranching are unsupported. You cannot use the lease or permit amounts charged by BLM because those subsidized amounts have been set by Congress. Finally, this causes unfair competition between ranchers inside and outside the park areas. Discuss on what basis NPS is authorized to subsidize the ranchers by giving away federal land use at less than fair market value. Johnes Disease There is no dispute, but that the cattle at Pierce Point Ranch gave Johnes disease to the elk that were delivered there in 1978. Half the dairy ranches at PRNS had Johnes disease at that time. Apparently, the beef cattle at Pierce Point Ranch had it as well. The ranchers have no right to keep infected herds on national park lands where they continue to infect and kill native elk and deer. Discuss why NPS regularly tests elk for Johnes disease, which has even involved shooting more than 20 of them two years ago to get tissue samples rather than simply using fecal samples. Discuss the costs associated with testing elk for Johnes. ¹⁴ While the ranchers have mentioned artichokes as a possible row crop, it is likely that some will want to grow wine grapes if the weather is suitable, and, to the extent it is now legal in California, possibly even marijuana now or some day. Each is far more profitable than artichokes. This comment applies to all your alternatives, except the no ranching one. ¹⁵ Speaking of groundwater, you should investigate and discuss how much groundwater would be needed to irrigate each type of row crop. ³⁴ Discuss why NPS has never tested cattle for Johnes disease when it has an obligation to manage its lands, including its natural resources, in an unimpaired manner. Manure spreading Any comments above regarding manure spreading are incorporated herein by reference. Manure spreading causes several problems and is basically limited to dairy operations because dairy cows urinate and defecate to a large extent in very confined areas. To the extent the manure contains the Johnes disease bacteria, the bacteria is spread all over fields where the bacteria, which can survive for up to a year in field conditions, can infect other cattle, deer and elk. Second, some of it gets into watersheds where the manure pollutes. If it contains Johnes bacteria, any cattle or deer or elk that drink the water can get Johnes. Discuss why NPS allows the spreading of manure on fields when the manure can be infected with Johnes bacteria and that bacteria can infect and kill elk and deer, which NPS has a duty to protect. Roads Discuss why NPS has never done anything to re-route that portion of Sir Francis Drake Blvd that goes through a watercourse and wetland. Discuss the damage to roads caused by milk tanker trucks, trailer trucks hauling hay and similar large vehicles used by or for ranching and why the ranchers shouldnt pay for the damage. Silage Comments regarding silage above are

incorporated herein by reference. Succession It is common knowledge that the ranchers want some kind of right of succession so that when a lessee dies his heirs have a legal right to succeed him as lessees and when those heirs die their heirs succeed them as lessees and so on in perpetuity. There is no right to succession currently and the Park Service should not attempt to create one. When a lessee dies, the land should be returned to a natural condition for national park purposes. Moreover, while the Park Service has the authority to lease land for ranching, where appropriate (no harm to natural resources), it doesn't have the authority to create any rights in land other than leases. SUMMARY NEPA requires you to clearly disclose and discuss the environmental impacts of your alternatives, but it doesn't prohibit you from choosing an alternative that is more harmful to the environment than another alternative. However, your three statutes require you to protect the 35 natural resources of these two parks. The only choice you have to avoid harming natural resources, short of managing the ranching in a way that would be so restrictive as to make it uneconomical, is to adopt the no ranching alternative. Sincerely, s/ _____ James Coda

#1263

Name: N/A, N/A

Correspondence: I am interested in more access for mountain biking. Thank you for considering all user groups.

#1264

Name: Grelock Yusem, David

Correspondence: To whom it may concern,

Thank you for the opportunity to comment on the 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.

I strongly believe that cattle ranching and dairy operations are incompatible with a National Park; this moment in time should be utilized to begin phasing out all (non-tourism) commercial operations in the area as per Alternative F (NO RANCHING AND EXPANSION OF TULE ELK IN THE PLANNING AREA).

My reasons for suggesting Alternative F are as follows:

1/ Commercial agricultural operations and a National Park on the same landscape are incompatible. While I appreciate the political realities that existed in 1962, which in order to pass legislation authorizing the PRNS, required, what I term, an experiment to allow commercial cattle ranching and dairy operations to exist within a National Park. The experiment should end, as the PRNS has not realized its full potential and should be allowed to do so.

Within the definition of a National Park (e.g., a scenic or historically important area of countryside protected by the federal government for the enjoyment of the general public or the preservation of wildlife), I do not see any mention of leasing land within a National Park for the purposes of cattle ranching or dairy operations. The active leases should be terminated and the park rightfully reserved for the enjoyment of the general public and well-being of the wildlife.

2/ The wildlife in the PRNS has been marginalized and the landscape has been fenced off from the general public's access. Removing man-made barriers will foster healthier wildlife and humans. An overabundance of beef and milk in the marketplace also removes the argument to maintain the agricultural operations for food security reasons and there are many more dairies in the greater North Bay providing sufficient supply of raw materials. (In fact, because of the production of methane gas, these operations have a direct correlation to climate change, but I digress&)

3/ The business model at PRNS is broken. Most National Park visitors are accustomed to paying an entry fee to use the National Parks. While charging an entry fee is not the Seashores current business model, it should be considered as the Parks location (e.g., near a large metro area that draws international tourists), un-realized (and under-exploited) cultural significance, and unique natural beauty, lend themselves to a re-evaluation of how the PRNS is financed.

A discussion around the business matters also dovetail well with what I believe is desirable for the Park to investigate (in addition to the EIS): a thorough re-evaluation and better understanding of the local communities that border the park and how the Park interacts with the various communities. Ive not given much thought to the nature of the investigation, but as the Superintendent knows, creating dialogue with the locals and visitors will go a long way to furthering the good neighbor attitude and cohesion that I believe has existed in the past, and should exist now like was demonstrated at the open house facilitated by the the NPS recently in Point Reyes Station and Sausalito. This dialogue should help guide how the park resources evolve and the type of legacy that is left for future generations of visitors to this special landscape. (One specific concern that I do have related to visitorship is: I suspect many more visitors to West Marin spend time in Point Reyes Station to shop and eat, and they never make it into the Park. I wonder why this is the case? Would these visitors be more enticed to visit the actual park if they had to buy a day pass or use their annual pass to visit, getting an official map and greeting in the process? Do they think that Point Reyes Station is the Park??? That is just scratching the surface and many more questions will come to mind...)

(General Note: Im all for ranching and dairy operations in Marin and Sonoma counties, as long as they are conducted outside of the Park. I believe that ranching and tourism can (and do) co-exist well outside of the Park. My primary concern is I do not understand why cattle ranching and dairy operations also have to be active inside the small (relative) area that is the Point Reyes National Seashore? Therefore, I believe that framing the Seashores future in a Ranching vs Tourism argument should not even be considered, as I believe that it was a mistake to continue leasing Park land when the leases last ended. Lets not make that mistake again. I believe that a small Park like PRNS should only encompass mostly wild things.)

4/ The recent recognition of the Point Reyes Peninsula Dairy Ranches Historic District is a curious event. While I agree that there is architectural, historical, and archaeological significance of structures in the area, how can these structures be preserved if they are on land that is being actively ranched and the public allowed to enjoy and learn about their history? I believe that in order to properly preserve this cultural heritage, active operations should cease and monies allocated to begin preserving this heritage, while allowing the public to become educated about the history and provided with the ability to access all of the Parks land.

As a 25 year Marin County resident, and West Marin resident for the last five years, I have come to call this small part of the planet home. My two daughters received their primary education in Marin County and the love of nature from their family and places like Point Reyes National Seashore, the Yosemite High Country, the Cascades, the Big Island, Canada, and many more far-off locales. My daughters learned to swim at Hearts Desire and Limantour beaches. My wife and I enjoy hiking in the Seashore and regularly clean up the beaches within the PRNS boundaries. We live on the border of the Park. We feel that we are a part of the ecosystem.

And we often are amazed that approximately 30 miles down the coast is the City of San Francisco, and here we stand, in an almost wild landscape, with a substantial responsibility to evolve this gem of a Park, properly, fairly and carefully.

Therefore, I believe that it is time to allow the Point Reyes National Seashore to become more fully wild and I urge you to err on the side of conservation, and fully protect this unique place by implementing Alternative F.

Thank in advance for allowing me to express my thoughts and taking the time to indulge me today and in the future, David Susan Grelock Yusem

#1265

Name: McFall, Kerry

Correspondence: Re: Point Reyes National Seashore (PRNS) One evening ten years ago, I followed my husband along a short trail from a parking lot to the beach on the end of Point Reyes. Out of nowhere, a huge elk appeared on the slope to our left. He stood silhouetted against the glowing sky, magnificent, unreal. I gasped as he was joined by two does, and the three of them faded into the twilight. We walked around the bend and down onto the sand, facing the sea. There were literally millions of people just a few miles away, but we had this corner of the world to ourselves. As the sun began to sink, we witnessed a phenomenon we have never seen before or since: a double sunset, one above the waterline, one in the water. Liquid amber, the reflection of the sun on the water was as big and perfectly round as the sun itself. And exactly between those two suns, a whale breached. I cried. It was as if Mother Nature was saying to us, "You're going to be fine, Kerry and Griff. Anything is possible." I had just come through radiation treatment for breast cancer. My husband had survived a major heart attack during the same time period. It had been a tough year. We stood in silence on that beach until both suns disappeared, then made our way back to the car. As we drove down the narrow road in the darkness, toward the ranch lands, a fox stepped out in front of our headlights. She turned her face to us and stared for a moment, then deliberately continued to cross. Another magical moment. Now, ten years later, I am dealing with breast cancer again. My hope is to return to PRNS this spring, to that magical beach, just as it has always been. And I want you to know that preserving PRNS should be a top priority, because I'm sure I'm not the only one who feels the magic. It's so accessible to so many people, it is a rare jewel. Please don't add any more stress to the wildlife by increasing or changing the ranching and farming activities. Please eliminate use of harmful chemicals or change of land use. Please protect and preserve all our parklands for future generations. Please protect the magic. Thank you.

#1266

Name: Baxter, Anne

Correspondence: Public comment ID: 1962820-91640/843 November 30th, 2018

I am a property owner in Inverness Park and I have lived here for over 27 years. I deeply love and cherish PRNS. I hike frequently in the park, swim in the bay, kayak, and bird frequently in the Seashore. I have volunteered over the years for spotted owl surveys and trail maintenance.

I believe strongly that A guiding principle for the management of the PRNS must be to restore and conserve the natural character of its lands so as to leave them unimpaired for the enjoyment of future generations.

It is obvious to the most casual visitor that cattle grazing has severely degraded much of the acreage on which grazing is allowed (Ranches A,B, and C are examples). Lease management must address this degradation and define a clear strategy and enforceable schedule toward the recovery of the natural environment.

Overall carrying capacity for cattle on the PRNS needs to be defined as well as the carrying capacity on each ranch. This exercise should include statistics showing cattle populations on each ranch by decade since the establishment of the PRNS.

The NPS must have the flexibility to modify lease terms by reducing herd sizes, excluding cattle from certain areas, prohibiting manure spreading in certain areas and requiring other Best Management Practices (eg exclusionary fencing with buffer zones from sensitive areas, rest/rotation etc) to assure rapid and measureable progress toward reversing the current state of degradation on certain grazing lands and protecting the ecological values for which the PRNS was created. The strategy must include vigorous measures to rebuild soils, restore natural vegetation, protect sensitive plant and animal species and protect recreational values.

A key measure of genuine restoration should include (1) the construction of exclusionary fencing from cattle and Tule Elk around springs, fens, creeks, wetlands, ponds and other freshwater features within the management areas as well as (2) seasonal testing of water quality in the above areas as well as adjacent water bodies (Abbotts Lagoon,

Drakes Bay and Tomales Bay are examples) to eliminate nutrient runoff from cattle, prevent erosion, and eliminate trampling by ruminants. These freshwater features need to be identified in the study documents.

Overall carrying capacity for Tule Elk also needs to be clearly defined as well as the areas in which Elk will roam. A clear strategy for dealing with Elk populations if and when carrying capacity is reached must be agreed upon.

In the final analysis, the NPS must retain the management authority to modify lease terms, or even terminate leases, where reasonable progress toward attaining agreed upon goals to protect the natural environment is not being achieved..

These are our public lands and we should demand that they showcase - and provide educational opportunities for the public to understand - how excellent ranch management can complement the natural environment in which the ranches are situated.

Sincerely,

Anne W. Baxter

#1267

Name: Cunningham, M.

Correspondence: I support option F. No Ranching and Expansion of the Tule Elk in the Planning Area

I live in the SF East Bay and have been visiting Pt. Reyes National Seashore since I was a child. I cherish the natural areas there: the grasslands, forests, beaches, streams, coast scrub. However, I don't like the way some ranches have despoiled these natural areas with ponds full of cattle waste, slopes denuded and scarred with well-worn trails from too many cattle, and some ranchers' desire to remove tule elk, which, unlike cattle, are native to California.

The NPS should be focusing on preserving and managing the native ecosystems (as well as the cultural resources of Native People) of Pt. Reyes rather than allowing profit-based ranches to operate within the Park. There are plenty of private ranches operating in surrounding places outside the Pt. Reyes National Seashore.

#1268

Name: Tarr, Christina

Correspondence: I would prefer the no ranching, all elk option.

It's a national park.

We have lots of places where ranching happens. To my knowledge, we have no place where only elk graze - - which is valuable because it's the original state of California before contact. For this reason alone, the elk-only area should be preserved as a study area.

People come from all over the world to see California in its native state. Let's offer them that opportunity.

I was sorry about the oyster company, and I am sorry for the ranchers, but it was in the agreement that ranching was not to last forever, and it's really time for ranching to go.

Thanks very much -

#1269

Name: Tesconi, Tawny

Correspondence: To Whom It May Concern: This letter is in response to the Point Reyes National Seashore and North District Golden Gate National Recreation Area General Management Plan Amendment and Environmental Impact Statement, 2018-11 EIS Public Scoping documents open for public comment.

Ranching within the Point Reyes seashore dates to the mid-1800s and has played an important role in the history of the area. Given the history and importance of agriculture production and working lands, Sonoma County Farm Bureau strongly supports the proposed Community Action Alternative document.

We believe it is in the best interest for all parties to issue agricultural lease/permits with 20-year terms to existing ranch families to continue beef and dairy cattle operations on approximately 27,000 acres within the planning area. Establishing a sense of security with ranchers will allow for better planning and assist in the continued preservation of cultural and natural resources in the area.

Through the success of other similar land management planning processes, we believe there is a value in establishing an PRNS Agricultural Advisory Committee, made up of local agricultural and natural resource conservation experts to assist in advising seashore decision makers. This group can be instrumental in exploring opportunities for operational flexibility and diversifications.

There is an immediate and long-term need for the management of the Tule Elk for effective separation from established ranches. Additionally, the elk are new to the ranching areas, and should not be included in the 150-year environmental baseline.

A strategy prioritizing maintenance of historic buildings on ranches in collaboration with seashore ranchers should be implemented. Prioritization methods should consider historic preservation goals and the needs of the current ranch operations.

We strongly urge the GMPA EIS team to choose the Community Alternative as the preferred alternative. It is the only alternative that would allow all ranchers to continue their farming heritage and focuses on preserving the working landscapes the park service is charged to protect.

Sincerely,

Tawny Tesconi Executive Director, Sonoma County Farm Bureau

#1270

Name: Powell, Michelle

Correspondence: Point Reyes National Seashore should be protected in accordance with the core mission of the National Park Service - to manage our National Parks for the protection of their natural wonders for the benefit and enjoyment of present and future generations. When Congress authorized buying ranchers' and dairies' lands in this area in the 1970's, the intent was made clear, with specific language, that the previous owners did not have the right of occupancy in perpetuity. Ranches and dairies operating on this parkland indefinitely, and using their influence to rid the park of tule elk and add other types of farming that pose risks to other wildlife solely for their benefit, is counter to the original Congressional intent for this national seashore and the mission of the National Park Service. To portray modern ranches and dairies as bucolic is misleading. I have seen operations at Point Reyes when I've visited, and they are not the scene of cows frolicking in green pastures that some supporters evoke. The reality I viewed was animals crowded together in paddock-like areas, slopping through and laying in mud and puddles. The stench and degradation of the land as well as a decidedly non-idyllic life for the animals was all too apparent. This is a depressing blight to this beautiful, unique landscape, and a deterrent to those who wish to experience the seashore's wild and natural beauty. This national seashore brings far more tourist-related jobs and dollars to support it than the below-market leases currently given to ranches and dairies can reap. To

allow the interests of a few to supersede the interests of all Americans who own this seashore is unconscionable. I urge the National Park System to commit to restoring these lands to the natural, unique ecosystem that is their legacy. This includes protecting Tule Elk rather than removing them, fencing them off, or killing them for the monetary benefit of ranching and dairy operations that should not be given precedence over the natural landscape and local wildlife that a national park is intended to preserve. If ranching and dairy farming is to be continued in the park for historic reasons, let those tracts be managed using the historic manner of those types of agriculture rather than industrial methods that create blight, and do not expand the types of farming and animal raising that could draw wildlife in and put them at risk. The park is for all Americans, and its land, surrounding waters, and wildlife, especially the Tule Elk that have been so painstakingly restored to the area, should be protected from the deleterious effects of industrial dairy and ranching operations, not surrendered to them. Sincerely, Michelle Powell

cc: Senator Dianne Feinstein Senator Kamala Harris Representative Jared Huffman

#1271

Name: Brenner, Jeff

Correspondence: I am writing to protest the removal of Tule Elk located on the Point Reyes Seashore per HR 6687. While I do not necessarily consider myself an animal rights activist, in this situation, I believe it would be inhumane to extinguish this small subspecies of elk. This is a destination that brings people from all over California and the US in general to view and appreciate these amazing animals. I would assume it could negatively affect the local economy as I know many people that have planned trips to the area for this specific reason (myself included). We need to protect this land and these animals, and continue to allow them to live undisturbed by those in search of monetary gain. I hope my voice is heard and these views are considered as this proposal is further discussed. I understand that decisions like this are not taken lightly, but please do your best to search for alternatives that would allow the Tule elk to stay at Point Reyes. Thank you.

-Jeff

#1272

Name: N/A, N/A

Correspondence: Please limit the amount of Ranching and farming at Pt Reyes. Do not allow it to grow or expand. When the leases are up, please discontinue the agricultural and ranching uses if the land.

#1273

Name: Eagleton, Justin

Correspondence: I'd like to voice support for improved bicycle access, as well as hiking access on various ranch and public lands in the Pt. Reyes Seashore. As a west Marin resident who, on both foot and bicycle, frequents the area there are quite a lot of places where increased access would benefit various user groups, especially with regards to creating longer loops on trails and paths away from vehicle traffic. Some of the projects I'd like to voice support for are listed as follows:

A new trail between Devil's Gulch and Platform Bridge through the Cheda, McIsaac, and Zanardi Ranches. Currently access around Barnabe and Devil's gulch is pretty minimal (especially with Bill's trail seeming to be delayed to the point of never opening..), and providing ways to expand the trail network on the east side of sir francis drake would be a great improvement.

A plan to connect the Cross Marin Trail into Point Reyes. This would be a very significant project as currently where cross marin trail ends forces cyclists onto either sir francis drake blvd. or platform bridge to point reyes road, both road that have significant, fast moving traffic - something that can test the nerves of experienced

cyclists and terrify a more leisurely one. In addition CMT is used by a number of walkers as well and further expanding it would provide great options for multiple user groups.

Adoption of social trails off Bolinas Ridge for better connectivity and a single-track trail experience. Social trails typically exist as a way to provide options that are lacking in signed trails in a network, and adding trails that are already established is an easier way to both improve connectivity and options for trail users without the construction of entirely new trails.

An extension of the Olema Valley Trail to Bolinas on the east side of Highway 1. Currently bikes have no legal way to get from five-brooks to Olema without traveling on Hwy 1. Providing alternative routes for cyclists to connect to/from Olema would be a major improvement on the trail network.

Gap closures for bikes through ranch lands in the park, including closing the Estero Trail loop, connecting Sir Francis Drake Blvd with Pierce Point Road, and connecting Marshall Beach to Pierce Point Road.

A more bike-friendly permit application process for road and mountain bike events in the park, including along Bolinas Ridge and out to the lighthouse.

Bike access to all ranch roads in the pastoral zone that are already open to pedestrians.

I'm sure some comments will include very strong opposition to some of these project ideas, though as someone who uses these lands (typically) on a weekly basis it is my opinion that most opponents carry a view that is very out of line with reality when it comes to everyday, shared trail user experiences. In addition, restricting access on lands, especially lands with historically uneven trail access, only continues to perpetuate the supposed conflicts and unfriendliness between user groups as opposed to taking steps to improve things.

I sincerely hope that some or all of these ideas are able to come to fruition and appreciate both the opportunity to comment and the time spent reading this. Thank you.

#1274

Name: Freedman, Jerome

Correspondence: Please make sure that Bill H.R. 6687 doesn't pass! Preserve the animals

#1275

Name: r, bill

Correspondence: I think encouraging recreation on these public lands is a good thing. I think there's room for some bike trails, but not on trails where there are horses and hikers. Some bikers are too reckless with their speed and disregard for the designated trails. Fines should be very heavy for bikers going off any road/trail and should be coupled with community service/trail repairs. Are there fire roads that bikers can use? I would also like to see a dog-friendly trail or two to the coast. On-leash is fine, but there's such limited access for hikers with dogs. It's such beautiful land, and it should be shared. I also think that there should be more prominent bike lanes on the roads for safety, or exclusive biking corridors for people to use to reduce accidents on roads. If there are sensitive habitats, then any trails should be taken into consideration so as to not interfere with plant and animal habitats.

#1276

Name: Swartz, Pamela

Correspondence: I'm writing to ask you not to allow more trail access to bicyclists in the Pt. Reyes National Seashore.

As a mountain biker and equestrian there are definite safety issues between these two user groups.

Many years ago, could be close to 20 now, I was horse camping at Stewart's Horse Camp and on a ride to the beach with some friends on the Stewart road/trail just above Wildcat Camp. As we were coming down the hill and made a turn to the right, we encountered a mountain biker on the edge of the road who was yelling down into the canyon to his friend, who was with an equestrian woman and her injured horse. The equestrian lady's friend had galloped off to get help for the injured horse.

Apparently, as the mountain bikers were coming down the hill, and the equestrians were riding uphill, one horse spooked as the mountain bikers came around the sharp corner and the horse knocked the other horse down the steep embankment. The horse was not able to recover ground and luckily the woman was able to bail before her horse flipped over and went careening down the steep and shrubby mountain. Its injuries prevented it from walking out and from what I heard back at camp the mountain bikers helped the owner recover her saddle, etc. and they left the horse to die. I'm not sure if a veterinarian was able to euthanize the horse that day/night.

It is my experience from riding in the Marin Headlands/Mt Tam, East Bay Hills, Mt. Diablo, Auburn Area, Hidden Falls, Foresthill, Nevada City/Pioneer Trail, high country/Grouse Ridge, Truckee areas that the type of people who are attracted to mountain biking are less inclined to follow speed rules and trail etiquette thereby putting ALL trail users at risk of serious injury, paralysis and death.

There WILL be major accidents and there will be legal repercussions - so why go there? Not to mention increased erosion and rogue trails going straight down mountain sides.

I strongly urge the NPS to deny mountain bike riders more trail access at Pt. Reyes National Seashore!

#1277

Name: Samet, Melissa

Correspondence: November 30, 2018

Re: Scoping Comments on 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 scope of the Point Reyes National Seashore General Management Plan and Environmental Impact Statement (EIS).

We are regular visitors to Point Reyes National Seashore who have hiked its incredible beaches and trails multiple times each month for more than 20 years. We are 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 we still live in California, and is the resource in California that we cherish most. We 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 As you develop the new General Management and Plan and EIS, we urge you to focus on alternatives that protect and restore the Seashore's natural habitat and wildlife populations, including the Tule Elk and the park's full range of predator species. These alternatives should also fully account for protecting viable

wildlife populations as the Park continues to suffer from increased erosion and habitat loss due in large part to the climate-change induced intersection of sea level rise and more frequent and intense storms.

We oppose continuation of ranching and dairy activities in the Seashore, and we strongly oppose actions to "manage" or "eliminate" the Tule Elk herds. Ranching and dairy activities have caused demonstrable harm to the environment and significantly undermine the visitor experience. Many of the farm buildings are in extremely poor condition, pastures are little more than seas of mud, fences mar the landscape, polluted runoff is rampant, and the smell of manure being sprayed on fields can be overwhelming - all of which detract significantly from the type of experience that should be provided by a national park.

More importantly, the ranching and dairy operations are harming the Park's wildlife and creating unnecessary conflicts with native wildlife, including relentless calls for "controlling" and "fencing-off" the magnificent native Tule Elk that add so much to the experiences of the Park's visitors. The proposed alternatives that would allow for "diversification" of farming would create even more conflicts with wildlife as the Park's abundant predators will naturally be drawn to the chickens, goats, and other smaller animals that would be allowed. Under alternatives that allow for such 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.

The damage to the Park and its wildlife is even more troubling since it is allowed for the sole purpose of providing profits to a handful of highly subsidized ranches and dairies. The Park should be managed for the public good and for the fish and wildlife that rely on this vital resource. The Park is a public treasure and should not be damaged for the personal profit of a few.

We strongly oppose actions to "manage" or "eliminate" portions of the Tule Elk population and call on the Park Service to abandon consideration of such actions. We urge full consideration of alternatives that reduce or eliminate ranching and dairy activities at Point Reyes National Seashore, and urge selection of Alternative F as the preferred alternative.

Specific Comments We urge you to ensure that the EIS complies fully with the National Environmental Policy Act, including by fully examining the issues outlined below.

1. The compatibility of each alternative with the Park's purpose and authorizing legislation. 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). The Park Service should reject alternatives that are not compatible with this purpose and authorizing legislation.

2. The implications of each alternative on the ability of the Park's wildlife to thrive in the face of climate change. The Park has already lost a significant amount of habitat due to erosion, and faces the likely significant loss of additional vital habitat and habitat corridors from erosion and other climate-change induced impacts. The Park Service should reject alternatives that do not increase the resiliency of the Park and its wildlife to climate change.

The Park Service 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 Park Service 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.

3. The implications of each alternative on increasing future conflicts with wildlife. Alternatives that would increase future conflicts should be eliminated from further consideration as they are directly contrary to the Park's purpose and authorizing legislation. Such conflicts would result from continuing operations, expanding operations, and increasing herd sizes, all of which will almost certainly lead to more calls for restricting Tule Elk and deer populations. Such conflicts would also result from diversifying operations to include smaller species such as chickens, which would unquestionably attract the Park's rich array of predator species, including red tailed hawks, marsh hawks, peregrine falcons, osprey, owls, fox, coyotes, bobcats, and others.
4. The implications of additional or enlarged fences on the health, resiliency, and viability of wildlife populations in the Park.
5. The implications of each alternative on water quality, including on the critically important Drakes Estero.
6. The implications of each alternative on plant species, and on the introduction and spread of invasive plant species.
7. The high probability that any imposed restrictions, limitations, and/or permit conditions designed to reduce adverse environmental impacts will not be fully complied with. There is a history of non-compliance with lease and permit conditions in the Park, and ignoring this history would present an inaccurate and unrealistically positive assessment of the full extent of adverse impacts of the proposed alternatives.
8. The cumulative impacts of past ranching and dairy activities. The EIS must provide "quantified or detailed information" on the cumulative impacts (and on the direct and indirect impacts), so that the courts and the public can be assured that the agency has taken the mandated hard look at the environmental consequences of the Project. *Neighbors of Cuddy Mountain v. U. S. Forest Service*, 137 F.3d 1372, 1379 (9th Cir. 1998); *Natural Resources Defense Council v. Callaway*, 524 F.2d 79, 87 (2d Cir. 1975). The cumulative impacts analysis is essential for ensuring that the agency will not "treat the identified environmental concern in a vacuum." *Grand Canyon Trust v. FAA*, 290 F.3d 339, 346 (D.C. Cir. 2002).

The cumulative impacts analysis required by the National Environmental Policy Act must account for the adverse impacts to the environment and to fish and wildlife from the ranching and dairy activities in the Park since the Park's inception. Understanding the impacts of these activities is essential for accurately determining the cumulative impact of additional losses, and is required as a matter of law.

9. The cumulative impacts of climate change. Of critical concern are the additive and magnifying effects of climate change on both resident and migratory wildlife species that utilize Point Reyes National Seashore. For example, the EIS should assess the impacts on the Point Reyes Tule Elk population if the Drakes Herd is "removed" under Alternative C or "managed" under alternatives D or E and the remaining Tule Elk are harmed by: (1) climate-changed induced habitat losses (including loss of connectivity between habitats, and/or loss of access to critical water or food sources); (2) climate-changed induced diseases or parasite infestations; and (3) climate-changed induced disasters including increased wildfires.

The analysis of the cumulative impacts of climate change must also look at the impacts to the many additional species that are, and will be, affected by continued or expanded ranching and dairy activities in the Park, including many migratory species. 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 through 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). 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.

Conclusion We strongly oppose actions to “manage” or “eliminate” portions of the Tule Elk population and call on the Park Service to abandon consideration of such actions. We urge full consideration of alternatives that reduce or eliminate ranching and dairy activities at Point Reyes National Seashore, including by fully assessing the items discussed in these comments. We call on the Park Service to select Alternative F as the preferred alternative.

Thank you for your consideration of these comments.

Sincerely,

Melissa Samet and Michael Leperi

#1278

Name: Vickers, Jeffrey

Correspondence: Hello, I'm a resident of San Geronimo, CA. I hike and bike in the Pt. Reyes National Seashore often.

I wonder if you would please consider expanding access for bikes in the park. I was just out on the Estero Loop today and was thinking that it would be great if that trail was more than an out-and-back ride for bikes. That trail is a pretty wide fire road which I think could easily support multi-use.

I live close to the Cross Marin Trail and hike and ride that often as well. Linking the Cross Marin Trail with Point Reyes would be fantastic.

I belong to several local volunteer organizations that would be more than willing to help with construction and/or maintenance for any trails that might get added or upgraded to the Point Reyes system.

Thanks!

Jeff Vickers

#1279

Name: Taylor, Kat

Correspondence: TomKat Ranch

November 30, 2018

RE: Comments on the Point Reyes National Seashore General Management Plan Amendment Environmental Impact Statement

Dear National Park Service,

TomKat Ranch is an 1,800 acre grassfed cattle ranch and learning laboratory that demonstrates how production livestock can produce both ecologic and economic value for human and wild communities. We are located in Pescadero, California (approximately two hours South of Point Reyes) and familiar with some of the same agricultural, ecologic, and social conditions the National Park Service (NPS) is seeking to address in your management of the Point Reyes National Seashore.

In partnership with Point Blue Conservation Science, the Natural Resources Conservation Service (NRCS), the San Mateo County Resource Conservation District (RCD), local and regional land trusts, and neighboring ranchers, we have seen firsthand how ecologically-focused and adaptive agriculture can produce healthy food and support agricultural heritage while simultaneously promote native and perennial grasses, grow healthy soil, improve water quality, and steward wildlife habitat.

TomKat Ranch supports continued ranching and dairying operations at Point Reyes. Agriculture is a vital cultural and economic aspect of California and, grazing, when done well and managed adaptively and holistically, is a critical asset for stewarding grassland ecosystems that rely on periodic impact from grazing animals.

Through our work in California and across the nation, we have seen both public and private lands where long-term, outcome-oriented agricultural leases with explicit conservation goals, holistic planning, and sensitive monitoring simultaneously provide economic opportunities for agricultural producers and valuable ecosystem services.

In the spirit of collaboration, we respectfully submit these comments in the hopes that sharing what we are learning may support your efforts to address the management of the lands currently leased for ranching and dairying at Point Reyes. We welcome the opportunity to share our science and curate visits to TomKat Ranch in order to foster cooperation that will help improve the natural resources under our care and stewardship. Please reach out via email for questions or concerns.

Sincerely,

Kat Taylor, Founding Director TomKat Ranch

RECOMMENDATIONS:

- **OVERVIEW** ○ TomKat Ranch supports continued ranching and dairying operations at Point Reyes. We believe ranching is not only of cultural significance to California, but it can be a critical asset for stewarding grassland ecosystems that historically have relied on periodic impact from grazing animals. ○ Over the last couple of

decades, we have seen many cases across the nation where long-term and outcome-oriented grazing leases with explicit conservation goals provide economic opportunities for producers as well as important ecosystem services for natural and human communities. We are in the process of collecting 20 case studies showing ranchers around the country who transitioned from conventional grazing to a holistic/planned/rotational grazing program. We are happy to share these findings.

- **BEST MANAGEMENT PRACTICES (BMPs)**
 - Comprehensive planning, explicit goals, sensitive monitoring, and adaptive management are the most effective ways to manage complex landscapes. However, in many circumstances in California, BMPs such as brush and weed control, variable stocking density, water system and fencing improvements, and road maintenance can reliably improve rangeland condition, watershed health, wildlife habitat, and soil quality.
 - Three approaches used at TomKat Ranch and recommended for consideration are:
 - **Ranch-wide Adaptive Grazing Plan:** An adaptive plan to address resource concerns of the present and future that can evolve as situations on the ground change and as improvements are seen in soil health, climate change etc. These plans should be developed in partnerships with ranchers, park staff, and interested parties. All resource concerns should be a part of the plan including public access and education, soil management, wildlife populations, quality of life for ranchers, future of the local foodshed, and educational opportunities for the 99 percent of people who do not produce their own food. This process is an invaluable step in creating a plan that effectively optimizes across all resource concerns in the system.
 - **Holistic Grazing plan:** Within the overall farm/ranch-wide plan, an adaptive grazing plan should be developed and implemented focused on improving soil health and carbon storage, water infiltration, soil microbial communities, native plant communities, wildlife, and forage production for both domestic animals and wildlife. Once the plan is set, ranchers make decisions based on the plans.
 - **Resource Monitoring:** Grazing success and compliance should be monitored for all resource targets/goals. At TomKat Ranch, we work with Point Blue Conservation Science and are part of the Rangeland Monitoring Network (RMN) that measures soil health, birds, vegetation, water quality, and infiltration rates. Our participation in RMN has been an invaluable way to see our progress over time and compare our results to similar ranches in California. Additionally, residual dry matter measures what remains at the end of the grazing season, we measure the reduction in bare ground as a critical measure for soil and plant health.
- **STOCKING**
 - Grazing is our management tool of choice at TomKat Ranch. We manage the herd with electric fencing and move them regularly to achieve our pasture goals. When done well, regular herd movement allows us great benefits. We can direct cows to graze heavily or lightly, stomp out weedy areas, provide their manure as compost to pastures that need nutrients, or calve in pastures far from predator pathways.
 - Our ranchers are authorized to choose stocking density and stocking rates to meet grazing plan goals and adjust depending on the conditions at a given time of year and the resource goals. Maximum stocking rates, if set too low, can lead to resource degradation including invasive weed and brush proliferation, loss of photosynthetic potential, loss of soil carbon, and wildfire fuel loading.
 - To meet resource goals, our ranchers have flexibility to match stocking rates with forage production and annual weather and resource constraints or abundance. Timely decision-making sometimes is what is needed to help ranches remain viable as natural conditions such as weather can change quickly.
- **LEASE DURATION/SUCCESSION**
 - To be successful in any industry, a business requires long-term certainty. Twenty-year rolling leases provide stability for ranching families to make personal and financial commitments and demonstrate to the next generation the opportunity to continue good management into the future.
 - Long-term leases allow ranchers to invest in their business, infrastructure as well as human and natural communities including soils, plants, animals, and wildlife.
- **ELK IN THE RANGLANDS**
 - The elk population needs to be managed in a way that is good for the elk and the landscape. In a natural setting, elk steadily move across the landscape pushed by predators and the search for fresh, diverse forages. Constant movement across grasslands allows for natural processes whereby grasses, forbs, and shrubs (any plant on the elk's diet or that is trampled underfoot by the elk) can be impacted and have time to recover. The regular movement of herds also disperses elk manure across the landscape to feed soil microbes and allow time for the land to heal and the plants to recover from the impacts of grazing.
 - The current situation at Point Reyes is not the natural setting for elk, therefore, they can easily overgraze reducing the native plants that evolved with them, fouling waters by concentrating manure, and causing erosion through overgrazing.
 - Unfortunately, the elk's natural predators, wolf or grizzly bear, are not an appropriate mix in the Point Reyes Seashore given the population of people who live and visit there thus a means for managing herd size so it can stay in balance with forage resources is recommended.
 - In the Rocky Mountain states, we know many ranchers who manage for both healthy elk and cattle herds. We welcome the opportunity to introduce the National Park Service to some of those ranchers if that would be helpful to learn more about their efforts.
- **FLEXIBILITY AND DIVERSIFICATION**
 - Everything in nature is connected and we try to manage TomKat Ranch with that in mind. Our ranchers are

encouraged to diversify operations as nature has no monocultures! The most successful agri-environmental operations we know about including organic, biodynamic, etc. manage their lands and businesses for and with diversity including multi-species crops and animals. Diversity (including plants and animals) when properly managed, builds soil microbial populations which in turn builds soil carbon which in turn increases water infiltration rates and water holding capacity of the soil reducing runoff and erosion and improving water quality downstream and allowing diverse plant communities including natives (as we have seen at TomKat Ranch) to return to the landscape. ○ TomKat Ranch does not use silage, but some ranching operations need alternate feed sources for their animals. Encouraging these practices to be done in a manner that is regenerative to the soils is important: Reducing bare soil and consistently having some type of living root in the soil to build soil microbial life, are critical tenets for our ranch management. It is what nature intended and thus should always be a goal.

We welcome opportunities to share more about how TomKat Ranch conducts its grazing planning, if that would be useful. Additionally, information about Point Blue Conservation Science Rangeland Monitoring Network is available online. <http://www.bayareascience.org/calendar/index.php?eID=17717>

Lastly, please see the inspiring videos below about the soil and forage benefits of planned grazing practices that we are excited about - www.soilcarboncowboys - www.kisstheground.com/regenerativesecret

#1280

Name: Boss, Tom

Correspondence: Marin County Bicycle Coalition (MCBC) greatly appreciates the opportunity to comment on the Environmental Impact Statement (EIS) scoping 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 comments reflect key organizational objectives:

-Expand trail access and connectivity. -Ensure the protection of natural habitats when building and maintaining trails. -Educate trail users how to have safe and friendly interactions. -Connect Marin communities through pathways, protected bike lanes, and neighborhood streets. -Improve safety on Marin's rural roads.

PUBLIC ACCESS & PLAN ALTERNATIVES

As you know, 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 MCBC views the GMP Amendment as a critical opportunity toward expanding recreational opportunities to PRNS/GGNRA public lands.

To this point, 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 all action alternatives in the PORE Public Scoping Newsletter. We believe our recommendations share these characteristics.

While identifying a preferred alternative is outside of our organization's scope, we oppose Alternative A (no action) on the basis that it does not expand or improve public access on leased lands.

RECOMMENDATIONS

**Establish a new trail between Devil's Gulch and Platform Bridge Road through the Cheda, McIsaac, and Zanardi Ranches.

Key Benefits:

-Creates connectivity with existing trails in Samuel P. Taylor State Park -Facilitates north-south connectivity - Expands trail access while enabling cyclists to stay off the road

We see a great opportunity to create a new multi-use trail in the North District GGNRA ranchlands between Devil's Gulch Trail in Samuel P. Taylor State Park and Platform Bridge Rd. near the intersection of Petaluma-Pt. Reyes Rd. through the Cheda, McIsaac, and Zanardi Ranches. While it may be possible to achieve most of this route using existing ranch roads, we strongly encourage NPS to review and consider new trail construction to 1) provide a more gradual trail experience that avoids some of the steepest climbs, and 2) to close gaps where roads leave GGNRA lands.

**Create a plan to connect the Cross Marin Trail into Point Reyes Station.

Key Benefits:

-Creates connectivity with Samuel P. Taylor State Park -Facilitates north-south connectivity -Extends a popular pathway that is accessible for users of all ages and abilities and enables people to stay off the road

The vision for the Cross Marin Trail- -an off-street pathway along the former Northwestern Pacific Railroad right-of-way from Pt. Reyes Station to Central Marin- -dates back to the 1970s. Though much of the right-of-way through San Geronimo Valley has been sold off or used for roadways, the pathway- -which currently runs through Samuel P. Taylor State Park- -could be extended from its current western terminus at Sir Francis Drake Blvd./Platform Bridge Rd. through GGNRA lands toward Pt. Reyes Station. There is one parcel between Platform Bridge Rd. and Point Reyes Station that remains in private ownership, but the County is currently studying options to connect this segment.

This project was included in the Marin County Unincorporated Area Bicycle and Pedestrian Master Plan, which was adopted in February 2018 (see project #43 on pg. 5-14).

**Adopt an existing social trail between Bolinas Ridge and Olema.

Key Benefits:

-Creates connectivity between several parks (Samuel P. Taylor SP, MMWD Watershed, GGNRA), as well as Bolinas Ridge, Olema, and Bear Valley -Expands trail access while enabling cyclists to stay off Sir Francis Drake Blvd. over Olema Hill

Park visitors currently use a cow trail that follows a powerline between Bolinas Ridge Trail and the town of Olema. This social trail could be improved and added as a system trail to improve connectivity.

**Adopt an existing ranch road between Bolinas Ridge and Five Brooks through Lupton Ranch.

Key Benefits:

-Creates connectivity between several parks (Samuel P. Taylor SP, MMWD Watershed, GGNRA), as well as Bolinas Ridge and Five Brooks -Creates a loop between the northern terminus of Olema Valley Trail and Bolinas Ridge -Expands trail access

There is a ranch road through the Lupton Ranch that creates a natural east-west connection between Bolinas Ridge and Five Brooks. We recommend adopting the road with enhancements to close a gap between Bolinas Ridge and the Olema Valley Trail.

****Extend the Olema Valley Trail to Bolinas on the east side of Highway 1.**

Key Benefits:

-Expands trail access while enabling cyclists to stay off a particularly dangerous stretch of Highway 1 -Facilitates north-south connectivity between Olema and Bolinas

While outside the planning area, extending the Olema Valley Trail would address safety for people on bikes, foot, and horseback by getting them off Highway 1 between McCurdy Trail and Bolinas. We respectfully request for the connection to be considered as part of this process.

****Close gaps for bikes through ranchlands, including 1) the Estero Trail loop, 2) a connection between Sir Francis Drake Blvd. and Pierce Point Road, and 3) a connection between Marshall Beach and Pierce Point Road.**

Key Benefits: -Expands trail access, enabling cyclists and hikers to traverse ranchlands without using roads - Facilitates north-south connectivity

As part of this recommendation, we're requesting improvements and trail designations to establish three new loops:

1) Estero Trail: Build a new trail segment at Drakes Estero (from Estero Trail to the north end of White Gate Trail) to provide a loop for all users. This would reduce the chances of visitors using the private road through Home Ranch.

2) Sir Francis Drake-Pierce Point: Create a trail connection between Sir Francis Drake Boulevard and Pierce Point Road through Rogers Ranch, M Ranch, and H Ranch using a combination of existing ranch roads and new trail construction.

3) Marshall Beach-Pierce Point: Designate the ranch road that connects Marshall Beach with the northern bend on Pierce Point Road as a multi-use trail.

****Establish a more bike-friendly permit application process for road and mountain bike events in the park, including along Bolinas Ridge and out to the lighthouse.**

It is our understanding that no organized bicycle events are permitted in PRNS/GGNRA's Northern District. We believe this policy is outdated and not aligned with PRNS' original intent to "save and preserve for purposes of public recreation, benefit and inspiration." We would request that PRNS/GGNRA amend the permitting policy to allow a minimum of six bicycle events per year.

****Open bike access to all ranch roads in the pastoral zone that are already open to hikers.**

Generally speaking, we have done our best to suggest projects that would have little or no impact on active ranching operations. In cases where trail alignments traverse grazing lands, we suggest the EIS include mitigation measures such as self-closing gates, signage asking users to stay on the trail, and education. Bolinas Ridge Trail provides a good template for an existing trail that traverses grazing lands.

IMPLEMENTATION

MCBC's Off-Road Program was established on three guiding principles: education, environmental stewardship, and expanded opportunities for mountain biking. We frequently partner with agencies and organizations on trail stewardship and educational programs, and stand ready to do the same with NPS.

Education & Safety

As a founding member of Trail Partners, we helped develop the Slow & Say Hello campaign based on our knowledge of trail-sharing initiatives and incentives. We have installed 1,500 bike bells at trailheads throughout the County and advocated for policies and best management practices to ensure safety and mutual respect among all trail users.

Trail Improvements & Maintenance

Following years of mobilizing thousands of volunteers for trail maintenance efforts, we recently launched MCBC Trail Stewards to foster the next generation of trail and habitat restoration stewards. Since the opening of the Dias Ridge Trail in GGNRA, MCBC volunteers have returned each year to care for the trail and maintain safety features.

Funding

For projects requiring significant capital funding, such as the Cross Marin Trail, we are eager to assist in identifying grant funding opportunities and support funding applications. MCBC has helped bring millions in bike/ped funding to Marin County, including a recent \$1.2m award to the City of San Rafael for a pathway project.

CONCLUSION

All of the recommendations outlined above were suggested by MCBC members or local residents and vetted by MCBC staff. We respectfully request that the EIS includes and evaluates our recommendations, each of which would greatly enhance the visitor experience and access to our public lands. We would look forward to meeting to discuss our proposals in greater detail.

#1281

Name: hamilton, tim

Correspondence: As God is my witness ! Please don't harm the beautiful soulful elk, by capturing them, to relocate or sterilize or kill them ! It is these sentient beings birthright to be free range. * Obviously, just fix the cow fences, since the beautiful soulful cows are tragically private property. And plant more grass please.

#1282

Name: hamilton, tim

Correspondence: As God is my witness ! Please don't harm the beautiful soulful elk, by capturing them, to relocate or sterilize or kill them ! It is these sentient beings birthright to be free range. * Obviously, just fix the cow fences, since the beautiful soulful cows are tragically private property. And plant more grass please.

#1283

Name: Bennett, Gordon

Correspondence: SAVE OUR SEASHORE A 501(c)(3) Charitable Organization (EIN 94-3221625)

November 30, 2018

To: Point Reyes National Seashore (PRNS) Re: PRNS General Management Plan Amendment (GMPA Environmental Impact Statement (EIS)

Thank you for the opportunity to provide comments during the 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 (GMPA). We conditionally support the Preferred Alternative.

Save Our Seashore has been working to protect Marin Countys Ocean, Coasts, Estuaries, Watersheds and Creeks since 1993. Save Our Seashore has been working on PRNS ranching issues for the past few years with colleagues in both the environmental community and members of the Seashores agricultural community with the goal of strengthening relationships and building trust. We are striving to work cooperatively towards common goals of protecting national park resources while allowing sustainable ranching and dairying operations to continue in the pastoral zone.

SOS believes that a robust analysis under the National Environmental Policy Act (NEPA) of all alternatives in the GMP Amendment will enable PRNS to assess mitigation and management measures that could improve the environmental sustainability of the ranches. Sustainability is the key concern that underlies all concerns. We believe it is a common and cooperative cause among those responsible for the continuing resource values of PRNS as part of the national park system&including the ranchers and the visiting public.

In the absence of a formal advisory body that must be consistent with Federal Advisory Commission Act, we urge PRNS to continue its open-door policy to hear views and comments from ranchers, environmentalists, and the public regarding effective ranch management strategies and other PRNS issues.

We outline our suggestion for areas that we request the EIS to assess in further detail below.

Gordon Bennett, President, Save Our Seashore

RANGEMANAGEMENTCOMMENT

RANGE MANAGEMENT OVERVIEW: We request that GMPA EIS set out clearly defined objectives with robust and publically disclosed metrics to instill confidence that ranchers operating their family businesses on public land are responsible stewards committed to regular progress in protecting and enhancing the natural and cultural resources of PRNS. To that end, we request that the EIS assess range management tools and metrics that will ensure progress toward the objective of restoring PRNSs endangered California coastal prairie. Currently, Forage Productivity, Residual Dry Matter and Species Composition are the metrics used by PRNS to measure progress on range management objectives. There are problems with all three.

FORAGE PRODUCTIVITY (FP):

FP #1: The primary resource for calculating Forage Productivity (carrying capacity) is the average rainfall forage production data from the National Resource Conservation Service (NRCS) Soil Survey (SCS). But as shown in the 2015 Coastal Dune Restoration Environmental Assessment (Dune EA), PRNS was still using data from the 1985 SCS, although 2014 data was available. Our brief comparison of the two data sets indicates that the 2014 SCS significantly reduced estimated forage for PRNS soils and slopes. For example (assuming 900 lbs of forage per Animal Unit (AU) per month and 1200 lbs per acre Residual Dry Matter (RDM) left on site) the AUs on the Zanardi Ranch per the 2014 SCS should be 0 vs 45 allowed currently. We request that this EIS disclose the SCS data (1985 or 2014) used and explain why that choice was made.

FP #2: The Dune EA also indicates that forage calculations are further reduced because the NRCS soil maps are too coarse to be suitable for ranch planning at PRNS (SCS 1985). Thus PRNS has developed GIS data that excludes as ungrazeable those areas dominated by brush, trees, sand, rock, etc. as well as areas excluded by fencing for erosion control, riparian habitat protection etc. Despite more exact GIS information being available, PRNS ranch permits list only gross acres and permitted AUs, thus rendering comparisons and understandings impossible for the public. Further, we note that the Fair Market Evaluations that establish the rent for PRNS ranch acreage have been using the coarse NRCS soil maps from 1985 instead of the more detailed GIS data. Thus we request that this EIS disclose the GIS data used for forage calculation at PRNS.

FP #3: To calculate forage consumption, PRNS assumes a 1,000 pound cow eating 900 pounds per month. But the USDA National Agricultural Statistics Service data shows the average live weight of beef cattle slaughtered in 2015 was 1370 pounds. Further, the 1,000 lb figure used by PRNS includes both the cow and the un-weaned calf, whose nutrition needs would require the cow to consume more forage than needed for just the cows own sustenance. Thus we request this EIS to disclose: 1) the weight used to calculate forage consumption; 2) to what extent the un-weaned calf is include in the forage calculation; and 3) the body weight ratio used in the calculation (e.g. 3% or other), and explain why these choices were made.

FP #4: The forage calculation appears to assume that 100% of forage (above the required minimum RDM) is allocated to cattle, but other wildlife consume forage. We request that this EIS develop (as is done in other NPS units) a reasonable estimate for forage allocated to wildlife.

FP #5: At least one PRNS ranch moves AUs on and off PRNS land, which makes AU monitoring exceptionally difficult and also raises the possibility of introducing disease and invasive plants. We request this EIS to assess the value of prohibiting such a grazing plan.

FP#6: Traditional hay harvesting has been done for decades at PRNS to smooth the seasonal availability of fodder and to protect the grassland habitat from shrub encroachment. Supplemental feed is certainly necessary during droughts, but a sustainable stocking level for beef operation on PRNS rangeland should mean that (on average) excess spring forage could be hayed and stored for cattle use in the fall without the need for to buy supplemental feed. Instead, stocking levels are typically so high that the entire spring production of forage is consumed in the spring, making it necessary to import large amounts of feed to support a herd size in excess of what the land itself could support. None of the three range management metrics are assessed at the often expansive sacrifice (feeding) areas, so it is theoretically possible for PRNS beef ranches to conform to all three range metrics, yet still be operating as a de-facto feedlot. We acknowledge the ranchers argument that the cost of feed alone is sufficient to limit cattle numbers in excess of what the land can support. However, the ranchers argument is only part of the story, and may not even be the biggest part. The part left out is the price of the beef. In recent years, for example, severe weather in the Midwest has jacked up beef prices nationwide. The cost of feed also rose; however, we understand that beef operations in PRNS nevertheless made more profit in these years than they have in a decade&despite the higher cost of feed. Thus the economic incentive to keep PRNS beef herd sizes high, despite the cost of supplemental feed does exist. We acknowledge that regular supplemental feed is needed for dairy cows, but question its need for beef operations. Thus we request the GMPA EIS to assess the possibility of allowing beef cattle only at a number sustainable without inputs (except for unusual drought conditions).

FP SUMMARY: For the above reasons, PRNS ranchers may be paying for more forage than they actually have and there may be more AUs permitted than the land can actually carry. We request this EIS to disclose how it programmatically calculates AUs and that the EIS contain a commitment that the results of this programmatic calculation as it subsequently applies to each ranch be available to the public and that those details be included in every ranch permit so that the public, PRNS ranchers, staff, and Appraisers all have access to and use the same data.

RESIDUAL DRY MATTER (RDM)

RDM #1: UC Division of Agriculture and Natural Resources Publication #8092 is the RDM reference used by the SF Regional Water Quality Control Board in its Grazing Waiver program that applies to PRNS ranches. Publication #8092 specifies RDMs that vary by slope. For example, assuming 25% brush coverage, then the Publications recommended RDM would be 800 lbs. per acre on 0-10% slopes and 1400 on slopes over 40%. In contrast, all current PRNS Grazing Permits contain standard language that states: The RDM standard recommended by the Soil Conservation Service for Point Reyes and vicinity is 1200 pounds air dry weight per acre as an average for all grazed lands regardless of slope. Thus, the PRNS 1200 lb standard makes it impossible for PRNS ranchers to conform to two different RDM standards. The RDM of 800 lbs on a 0-10% slope would free up more forage for PRNS ranchers, while the RDM of 1400 lbs on 40%+ slope would better protect public resources.

We request that this EIS explain why the PRNS RDM of 1200 lbs per acre better protects resources on steep slopes.

RDM #2: The 2015 PRNS RDM Report lacks some important comparisons. For example, it does not compare the amount of current gullying and surface erosion (if any) with that found in previous years (e.g. the 1983 Guide to Monitoring Livestock Use within the Pastoral Zone at PRNS (1983 Guide) noted: As evidenced by severe gullying and surface erosion, many pastures are not presently in satisfactory condition.) We understand that PRNS and its ranchers have undertaken numerous projects over the prior years to treat gullying and reduce erosion. However, because these projects are typically done under a previously-completed programmatic analysis, they usually do not trigger any additional NEPA process that would make the project public. And since PRNS does not proactively make these projects public, the public has no effective way of knowing the extent to which PRNS and its ranchers are addressing these problems. It is more important that the resulting trend line is positive than it is for the public to know the status of gullying and erosion (if any) at any one moment. We request that this EIS compare current gullying with that observed in 1982 and list on the PRNS website corrective projects in order for the public to understand that progress is being made.

RDM #3: We concur with the 2015 PRNS RDM Report Section 4.4 which notes that seven key areas need to be up-dated. Five of these seven areas are non-grazed reference transects, while only two are in grazing. However, we believe it unlikely that key sites chosen circa 1987 have remained unchanged for 29 years. In 1987, changes in pastures required expensive 4-strand bard-wire fencing&now grazing use can be changed with (relatively) inexpensive electric fencing. Further, the concept of rotational grazing was unknown in 1987, but is now widely practiced. The underlying problem is that RDM is a very exact measurement based on a totally subjective choice of a key are that should reflect typical, average livestock use for that pasture. But there is nothing in the 2015 PRNS RDM Report that provides any justification for the choice of these 45 key areas. How are typical and average determined? Is there data to support these choices? Conversely, the 2015 PRNS RDM Report (4.4) contains just a reference to site #41 that is not representative. Is there data to support that conclusion? If the public is to have confidence in the RDM management method for more sustainable ranching in the Seashore, then we request that this EIS disclose the factors that determined key areas and how PRNS can assure the public that these key areas are truly representative of the whole.

RDM #4: The 2015 RDM Report notes, Woody plants like coyote brush (*Baccharis pilularis*) are not included in the RDM weight measurement and shade out grassland species which make up the bulk of a quadrant estimate. This raises the question of whether the RDM data is a metric of grazing intensity or instead a proxy for the extent of scrub invasion. Further, mowing, which reduces shrub invasion and increases RDMs, is a useful management tool that mimics the periodic Native American burning that created the coastal prairie habitat. We request that this EIS explain how it intends to use the RDM metric to measure grazing use vs scrub invasion.

RDM #5: Appendix A2 of the 2015 RDM report notes RDMs under 1200 were recorded in every survey since 2001 on 29% of the transects. Further still, there appears to be a pattern on many ranch transects that showed significantly more RDM prior to 1996, and significantly lower RDM for years after. Since the 2015 RDM Report notes that From 1987-1996, key area monitoring for each ranch or dairy was consistently conducted, but Between 1996 and 2011, there was occasional RDM sampling& it seems reasonable to conclude that when PRNS stopped monitoring, many ranches increased their grazing beyond what their Permit allowed. We strongly concur with the recommendation in the 2015 RDM Report: During drought years, RDM can fall below minimum standards... A recommended response is to plan the livestock grazing for the coming grazing season based on RDM remaining from the previous grazing season (Bartolome et al. 2006)&.The reduced stocking rate is likely to ensure that RDM minimum standards are achieved for that grazing season. Livestock grazing to below the RDM minimum may occasionally occur but typically only within a single season, which is unlikely to result in long-term damage to the range resource. Of course, in extreme drought years when forage production fails, the grazing season may have to be curtailed. The recommended management response requires effective and regular RDM spot-checks. Yet spot-checks of have been a problem at PRNS and unless materially improved, range management will be form without substance. We request this EIS to identify funding sufficient to conduct regular RDM and AU spot checking and

exhibit a commitment to publicly disclose current and historic RDM measures including when and where permitted AUs have been reduced.

RDM SUMMARY: There are multiple problems/conundrums with the RDM metric. Further, the 1983 Guide points out RDM that guidelines will protect the soil from excessive erosion, but will not ensure a return to the original composition of the vegetation. Protecting PRNS rangelands from eroding into the Pacific is a worthy but far too low an objective. Consequently, we suggest that RDM monitoring is totally inappropriate to be the primary metric by which to determine stocking levels in PRNS. Thus we request that this EIS note that robust monitoring of both RDM and species composition should guide PRNS management.

SPECIES COMPOSITION:

SPECIES #1: The most important thing that can be done to insure that sustainable grazing at PRNS exists and continues long-term is to follow the recommendation in the 1983 Guide: Special attention should be given to the feasibility of re-establishing native perennial grasses. Native perennial grasses would: 1) Provide year-round forage and decrease the need for supplemental feed; 2) Increase moisture retention in the soil and protect against drought; 3) Increase carbon sequestration; and 4) Better represent the historic California coastal prairie landscape. Unfortunately, the draft PRNS Report 20 Years of Rangeland Monitoring in Point Reyes National Seashore has numerous problems. The reduction in the cost of electric fencing and the resulting spread of rotational grazing raises the question of whether transect sites set in 1990 might still be representative. As with the RDM key sites, we request this EIS to identify the criteria by which the composition transect sites have been determined to be representative.

SPECIES #2: The draft Reports conflating of data renders it un-useful. For example, by pulling out the weediest beef sites, the remaining beef sites look proportionately but un-representatively better. Further, the Reports mixture of data from both beef and dairy makes analysis of comparative impacts impossible. It is also unclear how long ago cattle access must have ceased in order to qualify as a Control Site or a "Grazing-Ceased Site. Mixing of disparate cessations and/or different post-grazing treatments render the data less useful. The draft Report also does not explain if or how it selects or weighs data points. The 1990 Handbook specifies annual sampling for the first five years, then sampling at 5 year intervals, but the draft Report shows no sampling on this schedule and several sites have been sampled only 3 times in the 23 years. We request that this EIS assess correcting these problems in a final Report.

SPECIES #3: The draft Report concludes that "Collectively, grazed sites have exhibited little change over time"& despite the fact that Total Herbaceous Exotics as well as two invasives increased ten-fold. But that conclusion is based on a comparison of 1980s data to 2000's data. It is generally accepted that two data points do not make a trend. A more sophisticated statistical technique, called windowing, can be used to determine trends in complex data. We request that this EIS assess such statistical tools to analyze this species composition data and that the techniques, assumptions and underlying data of the final Report are made public.

SPECIES SUMMARY: The most important aspect of the final Report on species composition is not its conclusion, but rather the integrity of the study itself. Management can be adjusted to address the Reports conclusion& provided there is confidence in the Report itself. Thus we request that this EIS identify milestones in the 20-year leases should determine whether the permitted grazing regime should be altered to achieve this objective and that the annual species composition monitoring results be posted on the PRNS website.

NATIVE FLORA, FAUNA AND PROCESSES NATIVE #1: Native Americans periodically burned to create the California coastal prairie habitat. But 150 years of non-native grass growth has materially altered top soils, particularly along the north edge of the planning area where formerly moving fore-dunes have been stabilized and the back-dunes converted to grow grass. Thus it would seem unproductive to consider restoring to coastal prairie such habitat that never was coastal prairie. Thus we request this EIS to assess phytolith studies as a method to estimate where coastal prairie habitat existed in PRNS and thus where it might be most reasonable to focus restoration efforts.

NATIVE #2: the GMPA Newsletter proposed system of Land Management Units (LMUs) assumes avoidance by un-fettered cattle of sensitive (e.g. riparian) areas, but the example on page 11 has no scale, so we are unclear as to the amount of setback suggested. Thus we request that this GMPA EIS assess specifying a setback sufficient to allow the creek to restore itself (or be restored) to natural conditions in which creeks (that are typically incised from being berm-constrained on grazing lands) instead aggrade to allow high flows to reconnect the creek with its historic floodplain. We also request that this EIS assess regularly updated progress toward the goal of creek restoration being posted on the PRNS website.

NATIVE #3: Impoundments for livestock water serve as critical breeding habitat for the endangered California red-legged frog (CRLF) and thus this EIS should assess prohibiting un-fettered cattle access. We also request this EIS to assess creation of a programmatic permit for trough maintenance, without which CRLF habitat will continue to fill in (since individual ranchers cannot afford the time and expense of an individual permit).

NATIVE #4: This EIS should assess a requirement that over time, wildlife-friendly fencing must be installed where feasible throughout the non-core ranching area. We also request that this EIS assess regularly updated progress toward the goal of wildlife friendly fencing being posted on the PRNS website. NATIVE #5: We support application of compost (vs slurry) on pastureland. However, we do not support compost on rangeland. Carbon farming studies typically focus on increased carbon (C) sequestration in the soil and dismiss the quickly more than offsetting enteric fermentation (CH₄) impacts from higher stocking levels enabled by compost-enhanced forage. This dismissal is based on the claim that this increased forage will not increase stocking levels but will instead decrease supplemental food. Not only is there no evidence to support this claim, but available evidence contradicts this claim. Further carbon farming advocates typically rely on short-term species composition studies to dismiss impacts to native rangeland species endemic to the California coast nutrient poor soils. Thus if carbon farming is to be considered on rangeland, then we urge that his EIS to assess impacts on both native vegetation and greenhouse gas.

NATIVE #6: Other sensitive habitat includes wetlands and is also not limited to certain areas, but can also exist seasonally. We urge this EIS to assess how best to protect seasonal wetlands and other seasonal sensitive habitat. We also request that this EIS assess regularly updated progress toward the goal of wetland protection being posted on the PRNS website.

NATIVE #7: We request that this EIS also assess a requirement that livestock water be pumped to disparate troughs to reduce impacts around any one trough. We also request this EIS to assess creation of a programmatic permit for creation of new distributed troughs (since individual ranchers cannot afford the time and expense of an individual permit). We also request that this EIS assess regularly updated progress toward the goal of distributed troughs being posted on the PRNS website.

NATIVE SUMMARY: Native grass habitat at PRNS has been so significantly degraded that full restoration of the native grasses would be difficult. However, new techniques are constantly evolving, which argues for careful protection of those areas where native grasses still exist. This does not mean excluding those native grass areas from cattle-grazing (native grasses evolved with native grazers). But it does mean protecting native grass areas from any possibility of over-grazing or by compost application over rangeland that would favor Mediterranean non-natives. Thus we urge this EIS to identify locations where and techniques by which existing native vegetation could be better protected and to identify feasible opportunities for native grass restoration.

RECREATION SUMMARY

RECREATION OVERVIEW: The transition from private ownership of PRNS ranches to Reservations of Use and Occupancy to Special Use Permits has left many of the public and some PRNS ranchers confused about public access to PRNS pastoral lands. Further, state laws prohibit unfettered access to core dairy areas for bio-security reasons. Further still, common sense would indicate that park visitors should avoid areas commonly used by heavy equipment, including ranch cores and park maintenance yards. Lastly, common decency would indicate

that park visitors respect the privacy of park residences, whether housing ranch employees or park rangers. These are solvable problems.

RECREATION #1: Acreage beyond the ranch core and diversification acres must be fully open to PRNS visitors without handmade signage appearing to deter public access. Thus we request that this EIS assess the feasibility and efficacy of standardizing signage through PRNS so that, for examples, respect residents privacy signs would be available to both park ranger residents and ranch residents alike and authorized vehicles only signs could be set up on roads closed to visitor vehicles for park administrative/safety purposes as well as on ranch driveways.

RECREATION #2: We request that this EIS assess the feasibility and efficacy of requiring a fat man gate adjacent to every locked gate on PRNS pastoral to facilitate visitor access to pastoral lands that are outside the ranch core or not otherwise closed for safety reasons.

RECREATION #3: We request that this EIS assess the feasibility and efficacy of installing at key sites new signage that condenses to 3-4 lines appropriate visitor behavior around cattle. Presently this information is found only on the PRNS website and runs a page long.

RECREATION #4: We request that this EIS assess the feasibility and efficacy of installing at PRNS dairies so requesting new signage reminding visitors that access to the dairy core requires an appointment due to bio-security concerns. In the past, this information has found on hand-lettered signs that simply say no trespassing, which is inappropriate for public land.

RECREATION #5: We request that this EIS assess the feasibility and efficacy of placing a condition into every ranch permit that would require each rancher to treat park visitors who are obeying the rules with respect and to report those not obeying the rules to PRNS enforcement staff (rather than acting on their own).

RECREATION #6: We request that this EIS assess the feasibility of determining where selective pastoral access could be identified (without additional parking) by on-site signage and by PRNS maps to direct park visitors to ranch roads that provide interesting views or access to interesting destinations. We also specifically request that this EIS assess opening the road from the Estero trail head to Muddy Hollow that according to *Ranching on the Point Reyes Peninsula* (pg. 48) is the historic Original Road from Olema to Point Reyes. The public is currently prevented from experiencing their own history by a locked gate. If the historic road is opened, then we urge that this EIS assess creation of a short loop around the H ranch core (the present 10-mile loop is excessive and eliminates the historic context of the road).

RECREATION #7: We request that this EIS assess whether allowing bicycles on ranch roads is easily compatible with ranching activities. If so, then we further ask this EIS to assess the feasibility of identifying key ranch roads to open to bikes in exchange for removing bikes from single track trails (e.g. the Estero trail and the Chimney Rock trail) where they are currently allowed such that the length of ranch roads newly opened to bikes is at least the same or possibly longer than the length of single track trails to be newly closed to bikes.

APPRAISALS

APPRAISAL OVERVIEW: It is not clear why prior Appraisals for PRNS range land focus on comps of private lands, which then have to be discounted to account for constraints on PRNS lands, when More than 130,000 acres of grazing land&is owned and managed by various park and open space entities in the San Francisco and North Bay Area. Despite these 130,000 acres leased by public agencies, the PRNS appraiser claims to be unable to find any leased properties that had similar restrictions as those proposed [for PRNS ranches]. Further, the PRNS Appraisals rest on a few poorly-identified comps (no addresses, owners or renters listed). We believe these comps are not adequately representative and may result in overly-discounted rent values. More transparency on these comps is necessary because many of the ranches in Southern Sonoma and Marin are owned by the same families, many of whom are inter-related. The poorly-identified comps make it impossible for the public to determine whether the cited rents are arms length transactions or transactions between related parties. The difference between the PRNS Appraisal comps and other reasonable comps are stark. In our first example, the USDA

average annual rental rate for California pasture land in the North Coast area for 2008 - 2012 was \$16.10 per acre as seen on page 3 of the USDAs 2012 California Land Values and Cash Rents Release. For example, applying the USDA rate to the 1510 acres at PRNSs F Ranch (which host 175 Animal Unit per month) would result in rent of \$24,915 per year, whereas the rent actually charged by PRNS is only \$14,700, a discount of 41%. As another example, the East Bay Regional Park District put out a RFP that bases rents on beef prices. Based on last Junes feeder price of about \$150 per hundredweight, the EBRPDs AUM fee would be \$21, whereas the AUM fee actually charged by PRNS is only \$7, a discount of 67%. A roughly 50% discount is in line with the rental data found in the July 2009 PRNS Response to UC Davis which states (emphasis ours): NPS grazing fees are significantly lower than those charged by other agencies. Current animal unit rates in the park range from \$7 to \$9 per AUM compared to \$15 to 20 per AUM outside the park. It is also important to understand that the public agencies cited by the PRNS Response may have some of the same constraints as those at PRNS: distance from agricultural/urban centers (incorrectly measured and ignores feed delivery priced by weight not distance), public access, herbicide restrictions, limits on eradication of non-forage vegetation, and regulations on predator control. Discounts for all of these constraints would presumably be reflected in rents charged by these public agencies (compared to rents for private lands without these constraints). Further still, prior Appraisals themselves admit that public access results in no monetary loss and thus discount claimed could be better spent on signage and fat man gates mitigate any problem. Further, past appraisals looked only at the claimed added costs at PRNS even while acknowledging that Marins coastal agriculture is well known for its quality grasslands, due to foggy, moist conditions that keep the grasses green much of the year and make them well suited for grazing. Yet the appraisal do not include any upward adjustment for the 1-2 month longer growing season. Assessments claiming to justify such significantly lower rents may pass NPS headquarters appraisal review as fair, but they do not pass muster with anyone locally knowledgeable that the unique PRNS circumstances claimed to justify appraised values that are not in fact unique and in many instances may not in fact occur.

APPRAISAL #1: We request this EIS to assess omitting the bogus and expensive appraisal justifications and go directly and transparently to a fee for PRNS rangeland that is based comparable publicly available rent data (USDA average per acre value or the EBRPD feeder price) and provides a uniform PRNS range-wide discount (not to exceed PRNS management costs) that is based on the over-all contributions to the PRNS historical cultural landscape.

PASTURE MANAGEMENT COMMENT

PASTURE OVERVIEW: We request that GMPA EIS set out clearly defined objectives with robust and publically disclosed metrics to instill confidence that ranchers operating their family businesses on public land are responsible stewards committed to regular progress in protecting and enhancing the natural and cultural resources of PRNS. To that end and given that since the 1970s almost half of the dairies in PRNS have been converted to beef, we request this EIS to assess pasture management tools and metrics that will protect and enhance the possibility of restoring PRNSs endangered California coastal prairie if pasture is converted to range.

PASTURE #1: We understand the desire to grow supplemental feed for PRNS dairies. Modern cows have been bred to be milk machines and thus require supplemental feed that goes far beyond what a dairy cow could realistically forage on it is own. Silage was not planted in the Seashore until the mid-1970s but now occurs on over 1000 acres that was approved piecemeal, without public input or environmental review. Mitigating silage impacts is of particular concern. For decades before the 1970s, supplemental feed was produced in PRNS using the traditional haying process that harvests naturally growing vegetation that is harvested in the summer (Silage is harvested in the spring). We urge the EIS to conduct comprehensive review of silage at PRNS and whether it may be possible to convert from silage to haying on PRNS pastureland. We note that PRNS dairies (all located in the highest fog areas) already benefit from the 1-2 month longer coastal growing season that reduces costs for supplemental feed. Further, all five dairies in PRNS purchase supplemental feed but only two dairies grow silage. This implies that growing silage on PRNS dairies is an economic option, but not an economic necessity. A change to hay for all PRNS dairies would result in all PRNS dairies being treated equally. The GMPA EIS should assess whether the two dairies could transition over to traditional summer haying, which has fewer environmental

impacts. We would request that this EIS also clarify that if silage is to continue, an appropriate balance should be struck between silage and impacts to public land, flora and fauna.

PASTURE #2: Hay production has less greenhouse gas impact than silage production— just because there is less fossil fuel burning equipment used in haying, but also because the anaerobic fermentation of silage creates methane, a potent greenhouse gas. Thus we question the claim that locally-grown silage has less greenhouse gas impacts than supplemental feed from the Central Valley. Unfortunately, greenhouse gas impacts from silage (and from cattle enteric fermentation) were omitted from the Seashores CLIP summaries, which considered only greenhouse gas impacts from manure ponds on the dairies. The energetic cost (calories in vs out) and as well as the environmental cost (water and enteric methane) of producing beef for human-consumption are both high. Further, PRNS grasslands evolved with and continue to need grazing ruminants. Native elk and deer are ruminants and thus produce enteric methane. If every beef cow were removed, there would still be methane produced. We request that this EIS consider the differing greenhouse gas impacts of hay, onsite silage and imported silage.

PASTURE #3: Silage involves planting and harvesting of quick-growing species in the early spring that coincides with the bird nesting season. The Pt Blue PRNS silage study indicates that sections within two of the reference pastureland plots were mowed during the course of this study&the likely reason for mowing was to control areas infested with thistle&This mowing likely disturbed any nesting birds present. Sites that were mowed during the Pt Blue study were supposed to be the un-touched reference sites. This mowing muted silage impacts when comparing silage sites to the mowed and less-birdy reference sites. This is a bias that the Pt Blue Study admits, but does not quantify. Mowing during the breeding season for birds could be considered a violation of the Migratory Bird Treaty Act. Conversely, mowing during key budding times that may overlap avian breeding periods may be necessary to control invasive exotics. We request this EIS to balance these two conflicting ecological values and memorialize them in specific detail in each ranch permit, so that the public can be assured that when it sees mowing during breeding season, then such activity is on balance ecologically necessary.

PASTURE #4: Silage harvest impact is outlined in the 2002 USFWS Biological Opinion that states: 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. Ravens are known predators of western snowy plover chicks and eggs (Roth et al. 1999). Ongoing research at Point Reyes National Seashore 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. Thus the same dairies required to promptly remove dead animals and cover feeding trays (in order to prevent excess raven predation) are producing silage that creates the same impacts on snowy plovers. Among the questions that the referenced Pt Blue Study was to address was What was the impact of silage mowing to breeding bird richness and abundance? Yet raven impact on breeding snowy plovers (which was a cornerstone to the 2002 USFWS Opinion) is absent from the Pt Blue Study. The Pt Blue study references the same study (Roth et al, 1999) as does the 2002 USFWS Opinion, but never states the connection that the Roth other research found between silage, ravens and breeding snowy plover impacts. Instead, the Pt Blue Study contains only an oblique statement that Having a better understanding of how silage fields in PORE affect the local raven population could inform future management decisions related to this species of potential management concern (Roth et al. 1999), although that is beyond the scope of this study. It is not clear how the impact of silage mowing on breeding endangered plovers could be beyond the scope of this study that was intended to study the impact of silage mowing to breeding bird(s). We request that this EIS correct this oversight and assess ranch practices that would reduce raven impact on snowy plovers.

PASTURE #5: Despite the Pt Blue Studys biases and omissions, it does appear to confirm reports from other expert observers (see RCMP Comment # 3045 from Mary Anne Flett) that silage harvest also directly impacts ground-nesting birds by destroying nests (and young). Other reports document silage impacts on the young of other species such as rabbits. Further, the Pt. Blue Study appears to demonstrate that silage acts as a death trap by first attracting nesting birds and then killing them: Since the overall abundance of breeding focal species averaged higher in pre-mowed silage than in the reference pasturelands, the silage fields likely also hosted more nests than the pasturelands, and thus incurred a concurrent amount of nest loss when mowing occurred. Lastly, the Pt Blue

study lists number of possible mitigations for silage impacts, none of which justify an increase in silage, but some of which may be appropriate if some existing silage is allowed to continue. However mitigation #2, a buy-out, is only appropriate on private land, not public land. Instead, this EIS should consider a commensurate reduction in the additional rent paid for silage acres when silage is required to be harvest at less than peak nutrient condition in order to protect breeding birds.

PASTURE #6: The 2007 Grassland Management Plan for Palo Corona Regional Park states: Tilling, seeding, and perhaps fertilization associated with cultivation displaces native plants and animal species. Following cessation of cultivation, old fields can be recolonized by native species, though research suggests that alterations to soil structure and seed availability may limit their ability to recover their natural structure and species composition (Stromberg and Griffin 1996). Further, a UK study states: Silage has higher moisture content than hay and so mowing for silage can begin as early as mid-March and can be repeated&This allows little time for both grass and forb species to flower and set seed and little opportunity for seed to enter the seed bank&.Because of earlier and more frequent cutting [of silage], seed set is largely prevented. Sources of food for birds and other animals are thus reduced. Lastly, the 1983 Guide to Monitoring Livestock Use within the Pastoral Zone at PRNS states: At Point Reyes, stands of native perennial bunchgrasses are now found only in areas inaccessible to plows& &plowing has resulted in the removal of native vegetation over large areas& Consequently, we concur with the 2002 USFWS Biological Opinion that PRNS will allow no increase in silage production and thus request that this EIS confirm that no additional silage will be allowed and that existing silage impacts be quantified and mitigated.

PASTURE #7: We understand that the silage areas already contain predominantly non-natives, and that to date, there is no prescription for species seeded into these areas other than what is in the lease/permit: "Use of tall fescue, Harding grass, and like cultivars of these grasses is prohibited. All seed will be certified as 100% weed free." California Red Oats (*Avena sativa* L), tetraploid annual ryegrass (*Lolium multiflora* Lam) and triticale are reportedly planted in PRNS for silage. Some consider annual ryegrass an invasive that threatens native grasslands but also note that ryegrass has naturalized and is widespread throughout California (and the world). According to PRNS Range manager Dylan Voeller (pers com), In general, the non-natives used in silage are less of a concern compared other more invasive species we see coming into the park. We would use the Cal-IPC rating, along with local information like abundance of the non-native and potential threat to native/sensitive species to rank threat. As a result of this ranking, PRNS has determined that there is no need for any formal monitoring protocol regarding non-natives in silage areas, but [we] certainly keep an eye out for new invaders. We request that this EIS re-consider a formal monitoring program as an additional mitigation for silage growing and also assess use of native seed.

PASTURE #8: Cultivation of plants for silage/haylage often uses tillers that furrow the soil (followed every few years by discing or plowing). These tillage practices greatly disturb the soil, displace native species and emit excessive greenhouse gas. If cultivation on dairies is to continue, we urge this GMPA EIS to assess lower impact planting procedures such as no-till planters that cut the soil rather than furrow it. We also request that this GMPA EIS similarly assess the use of lower impact aeration equipment that drills air into the soil, rather than discing or plowing that aerates the soil by overturning it. The GMPA EIS could also consider that silage residue could be increased from the current 20% to the conservation minimum of 30% and minimum tillage employed to reduce total equipment passes. Such lower impact practices leave the soil more intact, are less disturbing to native plants and wildlife, sequester larger amounts of greenhouse gas and build soil more capable of drought resistance. Lastly, the GMPA EIS should assess the feasibility of a bond as condition of continued silage to ensure that cultivated areas can be restored to typical existing rangeland conditions whenever silage may stop.

PASTURE #9: We urge the GMPA EIS to assess whether impacts could be also mitigated by harvesting for haylage rather than for silage. Haylage is harvested and wrapped in plastic marshmallows for anaerobic fermentation that retains most of the same nutrients as in silage. But because haylage is harvested later than silage, haylage likely has fewer wildlife impacts than silage. If haylage is planted, the GMPA dEIS could assess whether native seed could be used.

PASTURE #10: We also concur with the 2002 USFWS Biological Opinion that states: Point Reyes National Seashore will return silage fields to permanent pasture where possible. Of the roughly 22 beef operations in PRNS, only two plant silage. We believe that seasonal needs for supplemental feed can be satisfied on these two beef ranches as it is on the other 20 PRNS beef ranches without silage and its impacts. A continuation of the status quo also treats the PRNS beef operations inequitably. We request that this EIS assess whether continuing to allow the currently authorized 286 acres of silage on the two PRNS beef operation represents an avoidable impact to public resources. We also request that this EIS assess the possibility of returning silage areas on PRNS beef operations back to rangeland.

PASTURE #11: We consider silage to be a diversification on PRNS beef ranches, which per the NPS preferred alternative could continue within the 10-acre ranch core and the 2.5 adjacent acres. We request that this EIS assess whether it would be environmentally preferable on these two ranches to allow these ~12.5 acres of silage to continue in the currently authorized locations or to re-locate the silage to the ranch core and adjacent 2.5 acres. We also request that this EIS assess whether the other 22 PRNS beef ranches could opt out of diversification permanently and transfer 12.5 acres each to the 2 beef ranches currently authorized for silage (if so, then these two beef operations could continue about the same currently authorized silage acres).

PASTURE #12: If silage/haylage is to continue at these two beef operations as a diversification (or combined diversification), then the same mitigations for dairies could also apply (reduced tillage, later harvest, avoidance of sensitive areas, native seed, and a bond for restoration to native grass). And like the dairies with silage, beef operations that immediately convert to traditional hay should not have to pay the cost of restoring their former silage areas to their former condition.

PASTURE #13: We could support tilling, plowing, or disking to manage invasive weeds when the value of such weed control outweighs the other impacts of these activities. It appears that most of the current areas authorized for silage were selected on the basis of slope and access, but some silage on beef ranches may be intended for weed control. If so, then the GMPA EIS could evaluate the effectiveness of silage or haylage for weed control because it would seem that such a paradigm sets up an economic incentive to continue the weeds. We note that velvet grass areas have been regularly authorized for hay, but the Species Composition Study notes that velvet grass has nevertheless increased ten-fold. We request this EIS to consider whether more extreme measures, including selective use of carefully selected and applied herbicides might be a more effective and permanent than allowing continued haying of these invasives.

PASTURE #14: The GMPA EIS should assess requiring of all PRNS dairies to convert from slurry pond to solid waste manure management. This has significant greenhouse gas benefits as well as providing a more even reservoir of nutrients to recycle back into the soil with concurrent reduced chance that surprise rainfall could result in an inadvertent run off. The California Department of Food and Agriculture has a grant program to encourage such conversions. We also request this EIS to clarify whether the nearly 30% of the planning area defined as pasture represents only the area where dairy manure has been regularly applied.

ELK MANAGEMENT COMMENT

ELK MANAGEMENT OVERVIEW: We request that GMPA EIS set out clearly defined objectives with robust and publically disclosed metrics to instill confidence in an appropriate balance between protecting recreational opportunities, cultural resources of the historic pastoral zone and the natural resources at PRNS. Tule elk are charismatic mega-fauna native to PRNS, thus management efforts should not prevent PRNS free-range elk from expanding throughout PRNS. Elk management efforts should be used only to resolve conflicts with other activities authorized or mandated for protection in PRNS. For example, a herd of 100 elk running through a native plant nursery or picnic area at PRNS would create a conflict requiring management. Such conflicts between activities in PRNS are common, as with the elephant seal incursion onto Drakes Beach, or visitor impact on snowy plovers at other PRNS beaches. Further, an unmanaged elk population inside PRNS will inevitably spillover outside with damage to gardens and other private property that will result in the California Department of Fish and Wildlife (CDFW) initiating its own management effort by means of hunting. Consequently, we do not believe

that non-management of elk is a viable option. Once the free-range herd was established in PRNS, then the management of elk became a responsibility that could be postponed for only so long. To that end, we request that the EIS assess all available elk management tools and metrics that will ensure progress toward the objective of an appropriate balance between protecting recreational opportunities, cultural resources and natural resources at PRNS.

ELK #1: The primary underlying cause for the un-checked expansion of elk (and other ungulate populations) throughout the U.S. has been the suppression and/or extirpation of their natural predators. Tule elk populations are booming state wide and these elk are not classified as either threatened or endangered. Having removed elk predators (e.g. wolves/grizzlies), we have a responsibility to take over that management role. Although re-introduction of grizzlies or wolves to PRNS would face likely insurmountable challenges, we request this EIS to assess whether such re-introductions might be feasible to reduce the need for elk management by PRNS.

ELK #2: Populations of less-likely elk predators such as coyotes have may be suppressed by the virtual extirpation in PRNS of the California ground squirrel (*Spermophilus beecheyi*). This squirrel served as a keystone species in California grasslands, which are a large portion of PRNS. We suggest that the GMPA EIS assess the possibility of re-introducing into or encouraging remnant populations of the ground squirrel in the PRNS Wilderness area as a means to enhance predator coyote populations and reduce the need for elk management by PRNS.

ELK #3: Given that the EIS is likely to find that grizzly/wolf re-introduction to PRNS is not feasible and re-introduction of ground squirrels not possible, we request this EIS to assess multiple tools to achieve over-arching elk management objectives for their appropriateness, efficacy, intensity, duration, cost, and consistency with scientific research and other data. Over-arching elk management tools should include but not be limited to limited fencing, hazing, contraception, and improved elk habitat in areas that reduce conflicts.

ELK #4: The primary management tool in California to replace natural predation has been hunting. However, as the 1998 EA notes strong opposition exists to public hunting on Point Reyes has been expressed whenever public opinion has been sought. Nevertheless, we request that the GMPA assess whether appropriate staff, experienced professionals and/or properly trained and deputized members of both the general public or local tribes might be useful proxies for hunters as an on-going elk management tool at PRNS. ELK #5: The presence of Johnes Disease in PRNS free-range elk is not un-expected, since Johnes exists in multiple wildlife species worldwide and is communicable between species. This suggests that CDFW, under whose jurisdiction the PRNS elk falls, could prohibit re-location outside PRNS. Re-location within PRNS (i.e. to the Pierce Point Elk Reserve) is a possible option, though option care must be taken not to re-infect Pierce Point elk with Johnes Disease. Further, relocation efforts carry risks of lethal injury both to the animal being collected and to those doing the collection. Nevertheless, we request that the GMPA assess whether relocation by PRNS might be useful as an on-going elk management tool at PRNS.

ELK #6: Since the CDFW has determined that an Minimum Viable Population (MVP) of 100 is appropriate for a herd typically separated from other herds by hundreds of miles and thus with little to no genetic interaction, then the question arises whether the 100 plus elk in the free-range Limantour herd and the 100 elk in the free-range Drakes herd, separated by only a few miles, should each have an MVP of 100 assigned. Although there are no observations of genetic interaction between the two PRNS free-range herds (D. Press, per comm), similar anecdotal reports on other species (birds) have later been contradicted by genetic evidence. Thus the proximity of the two free-range PRNS elk herds and the lack of contravening genetic evidence suggest that an MVP of 100 is more appropriate for the combined herds. Given that this MVP can satisfied by the Limantour herd alone, then the Drakes herd could be managed for an appropriate balance between conflicting activities without the imposition of an artificial and scientifically un-supported 100 MVP floor. Thus we request this EIS to re-examine the assumption that 100 elk constitute the appropriate MVP for the Drakes Beach herd.

ELK #7: Elk management responsibility will inevitably fall to PRNS regardless of recent press coverage of impacts to PRNS ranches. The 1998 PRNS Elk EA noted that PRNS would manage elk so as to minimize impacts outside PRNS, but did not anticipate impacts on ranches inside PRNS. One of the key concerns expressed by PRNS

ranchers has been the impact, both current and long-term, on their operation on the land that they originally sold to and now lease-back from PRNS. This lease-back arrangement is pursuant to the intent of Congress that if the ranchers voluntarily sold their land to NPS, they would be allowed to continue ranching (as long as there was no permanent impairment of public resources). But as the late Joey Mendoza said, the elk weren't part of the deal. Further, the 1998 Elk EA noted that elk were not considered part of the PRNS historic pastoral cultural landscape. Lastly, carefully managed cattle grazing is widely known as a critical tool in preserving and restoring endangered California coastal prairie habitat. Replacing cows with elk will lead to the succession to scrub and ultimately forest habitat and the extinction of the endangered coastal prairie at PRNS. So a balance must be found. We believe impacts to PRNS ranches can and should be addressed and therefore ask this EIS to assess management tools specific to mitigating ranch impacts that would be in addition to those tools studied for over-arching elk management throughout PRNS. Such ranch-specific tools to be studied should include but not be limited to improving elk habitat outside the operating ranches, exploring waivers from the 30% organic forage requirement during droughts, and compensation to ranchers for forage loss, injury to livestock and fence/equipment damage. To model such an elk damage compensation program, we request that this EIS assess consulting with the Marin County Department of Agriculture, which successfully administers a program that reimburses County ranchers for verified livestock depredation. There can be room at PRNS for visitors on beaches with snowy plovers and beachgoers where elephant seals haul out and elk where ranches occur—but all these potential conflicts can and should be managed.

DIVERSIFICATION COMMENT

DIVERSIFICATION OVERVIEW: We believe that Seashores pastoral zone should remain pastoral, rather than becoming a hodgepodge of diversified activities. Such a hodgepodge would diminish the pastoral quality of the Seashore, burden the already thin PRNS staff and budget, threaten the endangered California Coastal Prairie Habitat, and impact the historic pastoral landscape. Thus we agree with Preferred Alternative that limits diversification to the 10-acre ranch core and an adjacent 2.5 acres, which would not detract from the pastoral quality of PRNS. However, past confusion, artifice, post hoc authorizations, lack of environmental review, public input and monitoring raise concerns about whether PRNS has the organizational capacity and budget to oversee the Preferred Alternatives proposed diversification. We request that this EIS assess whether PRNS has the budget and staff to robustly monitor and rationally assess diversification proposals.

DIV #1: We believe sustainability is of primary importance. PRNS dairies import as much as 70% of their feed. And while we respect Congressional intent that current PRNS dairies be allowed to continue, we do not believe that diversification proposals that require substantial inputs should be allowed. For example, according to Fair Market Assessments, some free-range chicken operations require the importation of as much as 75% of the chickens feed rather than using on-site produced feed, insects and scraps. Marin County defines a feedlot as a facility where at least 60% of the feed is imported or purchased. PRNS should not allow small-scale feedlots as diversifications on PRNS ranches. We request that this EIS assess the feasibility of permitting only diversification whose imported inputs represent less than half of the total input.

DIV #2: We categorically reject the idea that existing or past private commercial activities should constitute a baseline for diversification proposals. Many activities existed on PRNS lands in the past including ranch dumps, golf courses, residences, mines and hunting preserves. PRNS was established to protect the land from these uses with the sole exception that ranching and dairying would be allowed to continue as long as they did not permanently impair public land. We request that this EIS assess a carefully review of all current or proposed diversifications from a zero baseline. While it is possible that as a result of that review, some current diversifications could be authorized to continue or even expand, other current diversifications might need to be changed, reduced or eliminated. No current diversifications should be taken as givens. **DIV #3:** Raising chickens and turkeys are understood by some as being part of ranching and dairying at PRNS. We disagree. We do not believe that Congress intended for the 28,000 acres of pastoral land grazed by cattle at PRNS to become a 28,000-acre turkey farm. Thus chicken, turkey and similar operations should be considered as diversifications for additional reasons including: The raising of such chicken and turkeys creates substantially different impacts on both rangeland and pasture than does the raising beef cattle or dairy cows. These fowl are omnivores, while cattle

are herbivores&thus unlike cattle, these fowl will predate endangered California Red Legged Frogs (Rogers Ranch EA). Further, due to their larger size, cattle can largely coexist with predators of all sizes, from cougars to raccoons...all of which are important to ecosystem integrity. But these fowl are more susceptible to these predators that are cattle and thus their husbandry almost always involves predator deterrents such as movable huts (that also provide shelter). In the past, such high-height huts have been located some distance from the ranch core, but because such huts in such sites impact the historic pastoral viewshed, they have been required to be sited out of view from public roads. But compliance has been difficult and monitoring absent. In the future, visual impact might be better mitigated by siting high-height huts within a rotating 2.5 acre diversification band around the ranch core. Or (given that chickens can feed of insects in the droppings of free-range cattle) requiring that huts more distant from the ranch core be no higher than adjacent scrub vegetation (< 3) and that the cumulative grazing areas around these huts total no more than 2.5 acres. Other typical deterrents include guard dogs. But negative interactions between guard dogs and PRNS visitors are known and thus could deter visitor use of public land. Thus if predator deterrents are desired to protect these fowl 100% of the time, then these systems and the fowl themselves should be limited to the protected diversification/ranch core area. However, if ranchers wish to allow these fowl to forage outside that protected area, then deterrents should be limited to low height huts and dogs bred and trained to defend the herd (vs defend the perimeter). Lastly, turkey and chicken husbandry should remain as secondary use of PRNS land, with cattle as the primary use. For all of the above reasons, PRNS should not apply range management standards intended for cattle to chickens or turkeys. Thus we request that this EIS assess the impacts of chicken and turkey husbandry outside the diversification/ ranch core and recommend appropriate mitigations.

DIV #4: Raising sheep and goats are also understood by some as being part of ranching and dairying. We conditionally agree. However the raising of sheep and goats creates substantially different impacts on both rangeland and pasture than does the raising beef cattle or dairy cows. Sheep and goats graze land lower and more uniformly& resulting in a substantially less bio-diverse habitat than results from grazing by cattle. Further, due to their larger size, cattle can largely coexist with large predators like coyotes, cougars, bobcats, etc...all of which are important to ecosystem integrity. But sheep and goats are more susceptible to these predators and thus their husbandry almost always involves predator deterrents like woven wire fencing and guard dogs. Such predator deterrents not only significantly change the ecological balance, but also deter visitor use of public land. Sheep dog / hiker interactions have become a significant problem in Colorado and there is no reason to believe that similar confrontations could not occur in PRNS unless mitigated. Thus if predator deterrents are desired to protect goats and sheep 100% of the time, then these systems and the goats/sheep should be limited to the protected diversification/ranch core area. If ranchers wish to allow their goats and sheep to forage outside that protected area (e.g. during the day), then deterrents should be limited to dogs bred and trained to defend the herd (vs defend the perimeter). For all of the above reasons, PRNS should not apply range management standards intended for cattle to sheep and goats. Thus we request that this EIS assess sheep and goat husbandry outside the diversification/ ranch core and recommend appropriate mitigations.

DIV #5 : A new format for rent assessment should be established that fairly compensates PRNS (and the taxpayer) for commercial use of the diversification acres (non-commercial family gardens should not be charged). In the past, the Fair Market Appraisals for diversifications were based both on invalid assumptions and faulty logic. First, an (unquantified) discount was applied due to the claimed inability to use herbicides and the resulting PRNS requirement to use manual methods. However, carefully managed herbicides are indeed allowed to be used on NPS lands, as can be seen in the 2015 Dune EA. Second, because, the ranchers themselves determine whether to manage operations as organic, the choice not to use herbicides was their own, rather than one imposed by NPS. Thus there was no validity to the appraisers granting of a discount based on a false claim of prohibition that does not in fact exist or on a false claim of imposition that is in fact a marketing choice by the permittee. Past appraisal logic also set rent for alternate livestock as a percentage average cattle weight, which ignored differences in metabolic rates and thus forage consumption by alternative livestock&.but even if these two prior problems were corrected, at least one appraisal underestimated (by 100%) the weight of the alternative livestock (chickens). Different sheep and goat breeds can also have materially different average weights. Further still, chickens are omnivores, so it makes little sense to compare their grazing consumption to cattle. Also past appraisals for chickens exempted from any rent calculation the percentage (~75%) of feed imported, by which faulty logic a

chicken ranch on PRNSs public land that imported 100% of its feed would have been charged \$0 rent. The series of cumulative errors in prior assessments of fair value rent for chicken operations on PRNS resulted in such a low rent that the chicken operations became the principle use with cattle secondary. Lastly, the appraisers rent estimate base on relationship to cattle weight cannot logically be applied to 2.5 acres of cropland. Thus we request this EIS to assess how PRNS will determine the Appraised Fair Market Value for rent on potentially 28 different diversification proposals including but not limited to sheep, goats, chickens, turkeys and crops.

DIV #6: We urge this EIS to assess whether there should be a performance bond required to ensure removal at the end of their lifetime of new structures, including woven web fencing and huts for fowl, proposed to be added for diversification.

DIV #7: Further, given that this diversification is an entirely new program with likely unknown effects, we request this EIS to assess whether authorizations for diversification should last no longer than 5 years, at which point each diversification should be reviewed to determine whether it should be re-authorized.

DIV #8: Husbandry activities within the 10-acre ranch core and the adjacent 2.5 acres that have little risk of impact or escape include as beekeeping, raising rabbits, poultry, worms for castings, etc. However, little risk species do not include pigs/hogs, which we would support only commensurate with a cheese making operation. We also do not support (either inside or outside of the 2.5 diversification acres or the 10-acres ranch core) the keeping of non-traditional or exotic animals like water-buffalo, yaks, llamas, ostriches, etc. Thus, we request this EIS to assess whether diversifying into non-traditional or exotic animals is appropriate.

DIV #9: Farming activities within the 2.5 diversification acres and the 10-acre ranch core should not use any additional water than is already permitted for beef and dairy use unless subject to a permit based on a hydrological study that determines that such withdrawal will have no further effect on native flora and fauna. Alternatively, water already permitted for beef and dairy operations could be re-purposed for diversification provided the required permit is obtained. Thus we request this EIS to assess the impact on PRNS water resources from diversification proposals.

DIV #10: Before acquisition by NPS, typical practices on PRNS ranches included on-site dumps. We urge this EIS to assess whether (prior to any diversification being authorized) should be conducted (at a cost borne by the diversification proposer) of any diversification area proposal (such as farming or row cropping) that requires digging or otherwise breaking the ground to ensure avoidance of prior dumps as well as archeological sites.

DIV #11: One cooperative creamery seems a reasonable extension of traditional pastoral activities, provided that such creamery uses an existing building within the ranch core or is located within a trailer sited within the ranch core. Such cooperative creamery should only be for processing dairy products from within the Seashore (except for incidental additives/ingredients). Sales from that site of its own products could be allowed provided there is adequate parking and related visitor amenities. As part of that one creamery, and at that one location only, we could also agree to up to six (well-fenced) pigs to consume the excess whey produced by the creamery. Thus we request this EIS to assess the impacts of such one cooperative creamery. DIV #12: Sales of products (other than those produced from the cooperative creamery) produced from PRNS lands (e.g. grass-fed sausage from livestock in the Pastoral Zone, jam from fruit grown in the diversification/ranch core, or produce grown in the diversification/ranch core) should occur at PRNS Visitor Centers, not on the ranch site. Thus we request this EIS to assess the impacts of such sales.

DIV #13: Farm stays for the public seems a reasonable extension of pastoral activities, provided that provided that such tours are done in collaboration with the Seashores interpretive program in order to assure consistent and professional presentation, avoidance of traffic or other visitor conflicts, appropriate liability coverage and that such farm stays use rooms in the existing main ranch building to ensure that stays do not displace ranch worker housing. Such tours should not include weddings or recreational events that are private in nature and should be explicitly prohibited in each ranchs Special Use Permit. Similar to Marin County B&B regulations, the PRNS limit

should be three guest rooms. Larger proposals should require a public process. Thus we request this EIS to assess the impacts of such farm stays.

DIV #14: In the past, there has been renting of ranchworker housing units to individuals not employed at any PRNS ranch. Virtually all of the ranchworker housing consists of ranch operator owned trailers sited on PRNS property for which no rent is paid on the basis that the housing units are integral to the ranch operations. Thus a zero land cost enables a ranch operator to unfairly undercut rents for similar units in communities neighboring PRNS and also displaces housing units intended for individuals who are employed on PRNS ranches. Such rentals should not be considered diversification and should be prohibited. Thus we request this EIS to assess the feasibility of inserting into each ranch permit and robust monitoring of the requirement that ranch operators certify that their ranch worker units do indeed house individuals whose primary employment is on a PRNS ranch.

DIV #15: We regard production of electricity or compost using on-site materials as a part of normal dairying (but not ranching) operations. Electricity from manure ponds methane could reduce the currently-significant levels of Greenhouse Gas emissions from dairy operations. Better still would be dairy waste diverted to compost rather than to manure ponds. Such compost could be used on PRNS pasture land (but not PRNS rangeland). Sale of compost produced from on-site materials should be allowed at Visitor Centers. Thus we request this EIS to assess the impacts of producing and sale electricity and compost using on-site materials as part of normal dairying authorizations.

DIV #16: We urge PRNS to adopt the Marin County Codes definition of agricultural activity as the production of food or fiber. Such an explicit definition would exclude claimed agricultural diversification proposals such as the boarding of dogs or horses, the raising of kittens or puppies for sale, or the rental by ranch operators of structures or land for storage of equipment or material. This exclusion would not apply to home businesses on PRNS ranches that do not use land, such as second incomes from otherwise-employed family members. In the past, PRNS has often turned a blind eye to un-permitted activities that take up PRNS land&for example structures within the ranch core assessed at a rent of zero due to their presumed necessity for ranch operations have been in fact rented out for private storage. Special Use Permits that allow horses for personal use have morphed into use for commercial private horse boarding. The exception to this would be the grandfathering horse boarding that has been in continuous operation for the last ten years of a reservation-of-use (such as at the Stewart Ranch) but only if the horse boarding and pasturing is confined to the 2.5 diversification and 10-acres ranch core area and thus counts as the operators diversification. Thus we request this EIS to assess the impacts of limiting diversification acres to agricultural as defined by Marin County.

DIV #17: Subleasing of pastoral land. Such subleasing is an egregious permit violation that is explicitly prohibited in Seashore ranching permits but to which in the past, PRNS has turned a blind eye. The PRNS grazing rates were intended to support ranching and dairying in consideration of owners willing sale of their land to NPS and as a means to support the PRNS historic cultural landscape and endangered coastal prairie landscape. These grazing rates are not intended to be a profit center for prior seller to NPS that have gone out of the ranching. There have been both admitted and alleged violations (that absent monitoring are difficulty to prove). Thus, we request this EIS to assess the impacts of terminating the leases of all permittees known to have violated their permits in this regard as well as terminating the leases of all sub-lessors known to have taken advantage of this violation. We also request this EIS to assess the feasibility of robust monitoring and required registration of brand identifications for all authorized cattle on PRNs so as to insure compliance.

RANCH CORE COMMENT

VALUATION OVERVIEW: We request that GMPA EIS set out clearly defined objectives with robust and publically disclosed metrics to instill confidence that ranchers operating their family businesses on public land are responsible stewards committed to regular progress in protecting and enhancing the natural and cultural resources of PRNS. To that end, we request that the EIS assess:

CORE# 1: In light of the errors, biases, lack of transparency and questionable assumptions in prior appraisals, we request this EIS to assess whether it is appropriate for one Appraiser (William Groverman) at one Company (Redwood Empire Appraisal) to determine the Seashores ranching income, which in turn significantly influences how much the Seashore can commit to management and monitoring of the ranches.

CORE #2: We note that the Permits allow only the Permittee to challenge the Appraisals. We request that this EIS assess the proposal that the public also be allowed the same right to review and challenge these Appraisals.

CORE #3: We note that Appraisals that establish rent for each Permit, like Permits themselves, have in the past been available to the public only through a Freedom Of Information Request, which makes them far less than easily transparent. Appropriately-redacted Permits are now easily accessible on-line and thus request that this EIS assess the proposal that appropriately-redacted appraisals also be on-line.

CORE #4: On-site ranchworker housing must conform to minimum health and safety standards as assessed by both the U.S. Department of Health and by the responsible Marin County agency. Typical language (1.6.3) in the Permits requires conformance to employee health and safety. However, a review of the annual Public Health Inspections of employee housing shows the same health and safety violations persisting for years, but there is no follow up, no reward for compliance and no penalty for non-compliance. This fosters an atmosphere of non-compliance which can undermine public support for ranching in the Seashore and which this EIS must correct. Thus we urge this EIS to assess the efficacy of inserting into each permit language to the effect that Regarding all residences on the permitted land, Permittee will comply with applicable public health and sanitation standards and codes as determined by the responsible agency (federal, state and county) inspections. After notice by PRNS of failure to comply, the permittee shall have 60 days to cure, after which a fine of \$100 per day shall be assessed. Continued failure to comply will result in the termination of this lease. Further, as with appraisals, we also request this EIS to assess the proposal that appropriately-redacted health inspections also be on-line. Lastly we request this EIS to assess loosening the current permit language that allows only employees of the given PRNS ranch to live in ranchworker housing on that ranch and instead allow any PRNS ranchworker to live in ranchworker housing anyplace on PRNS-administered pastoral lands. CORE #5: We categorically reject the notion that abandoned vehicles and other ranch debris represent replacement parts storage. While we understand that ranches constitute working landscapes that do not easily conform to idealized notions of National Parks, we urge this EIS to assess whether there should be reasonable clean-up conditions incorporated into each ranch permit that would enhance public support for ranching without unduly burdening ranch operators.

CORE #6: The assessed rent for PRNS ranch residences is discounted by 40% for (possessory) tax, insurance, maintenance and all capital improvements. Re Possessory Tax: PRNS discounts dollar for dollar the Possessory Interest Tax paid by the permit holder. A key point that could trigger a substantial difference is the interpretation of the lease term. The PRNS Appraiser assumes a 5-year lease term, which results in a discount of 9.3% to the rent received by PRNS. If rent is adjusted every year, it is possible that the lease term would be considered to be 1 year in which the discount would be 0.96%. Conversely, with new 20 year leases, the lease term could be considered as 20 years, which would result in rent discount of 80.76%. When combined with all the other discounts (that the current Appraisals claim as components of a Fair Market Rent), PRNS for 20-year leases would be paying more out in ranching refunds than it collects in ranching rent. The shorter the Permits rent adjustment period, the less tax will be paid by PRNS. Since the tax is a pass-through, there will be no effect on PRNS ranchers. A shortened time period for the Possessory Tax will free up more dollar-for-dollar funds for PRNS investments in ranch improvements for resource protection. Thus this EIS should assess structuring its 20 year leases so that for purposes of calculation of the Possessory Interest Tax, the County would consider the leases to be at best a series of 20 one-year terms (or at least a series of 4 five-year terms).

CORE #7: The assessed rent for PRNS ranch residences is discounted by 40% for (possessory) tax, insurance, maintenance and all capital improvements. Re Insurance: After the insurance cost has been discounted from the gross rent, it is additionally subtracted from the net rent shown on each permit. This double counting must be corrected. Further, we note that because the cost for insurance is a dollar-for-dollar pass through from the Permittee to be paid (twice) by PRNS, Permittees have no incentive to shop around to get the best deal. Thus we

request this EIS to assess the possibility of waiving the property insurance for permittees, removing the double discount for insuring these buildings and bringing all these buildings into PRNS self-insured status. If the insurance requirement on Permittees can't be waived, then we suggest that this EIS assess whether it would be feasible for PRNS to lump all the required buildings together, solicit complete bids on the combined coverage, and then parcel out to each ranch their square footage share. Either of these options could result in savings to PRNS (but no added cost to the Permittee) that could fund investments in ranch improvements for resource protection.

CORE #8: The assessed rent for PRNS ranch residences is discounted by 40% for (possessory) tax, insurance, maintenance and all capital improvements. Re Capital Improvements: Unlike insurance, whose cost is determined on a ranch-by-ranch basis, capital improvements required to be made by the rancher are listed in a document separate from the Permit that already contains a uniform rent discount for capital improvements regardless of whether or how many capital improvements are proposed. Since ranchers no longer own the residences, there is no incentive or value in them paying for capital improvements that the uniform rent discount is intended to compensate them for and the capital improvement discount is simply pocketed. Thus this EIS should assess removing the uniform capital improvement discount from the rent and determining from each rancher what capital improvements will be required and paid for by PRNS and what capital improvements are requested by the rancher and paid for by the rancher.

CORE #9: The assessed rent for PRNS ranch residences is discounted by 40% for (possessory) tax, insurance, maintenance and all capital improvements. Re maintenance: Cyclical Maintenance is typically estimated at 1% of the property value per year. But at least some and perhaps much of what has become needed capital maintenance is actually cyclical maintenance that should have been performed under the terms of the Permit but was not. Thus the cost of cyclical maintenance paid for by PRNS in the form of a rent discount is simply pocketed by some ranchers without the required work being done & which then accumulates to become a capital improvement required by PRNS and thus paid for (again) by PRNS. Thus it is not clear why PRNS should allow a substantial rent discount in return for work that may not be done and is seemingly not monitored. In the Horick case, the Permittees conducted un-approved alterations that damaged historic structures and failed to properly maintain those structures. None of these Permit violations were discovered despite years of Annual Meetings, with the resulting restoration bill to the taxpayers exceeding \$500,000. A few bad apples should not be allowed to undermine public faith in the majority of PRNS ranchers who are responsible and who would respond responsibly to firm but fair inspections. Thus this EIS should assess whether it may be more appropriate for Park Services employees to provide those traditional landlord services and the Appraisal then to discount residential rent only for the possessory tax. Additionally, this EIS should assess significantly enhanced the required Annual Inspections including penalties for un-corrected maintenance work, such as After notice by PRNS of failure to comply, the permittee shall have 60 days to cure, after which a fine of \$100 per day shall be assessed. Continued failure to comply will result in the termination of this lease.

CORE #10: Typical in prior Appraisals are additional substantial and uniform discounts for ranch residences claimed to be un-needed and un-desired by the rancher yet impossible to separate from the surrounding ranching operations, thus warranting the discount. However, in contrast to that claim, the 20 acre Murphy Home Ranch was separated from the 2600 acre McDonald Home Ranch (see below left). Similarly, the buildings in the Home Ranch core were divided into Murphy buildings and McDonald buildings. Further, PRNS's L Ranch Dairy does not have its Permittees living on-site. This is further evidence that the PRNS Appraisals bulk discount for residences is unwarranted. Thus this EIS should assess eliminating the bulk discount and having each residence appraised separately as was done for the Murphy residences. Eliminating the unwarranted bulk discount could generate an estimated \$150,000 per year better spent maintaining historic structures or fixing ranch problems to better protect resources. **CORE #11:** Typical language prior Appraisal assigns no rental value whatsoever to various outbuildings and sheds typical on PRNS ranches (the Appraisal estimated a separate rental rate the subject grazing land and the home & only). This means that the Permittee gets to use all these buildings for free and the public gets no rent for use of that public property. Even worse, the Permit requires that the Permittee to obtain insurance on these buildings whose cost is reimbursed to the Permittee by PRNS. So the public is actually paying the permittee for Permittees free use of these public buildings. Most private residences in West Marin at least one

and often more out-buildings in addition to the garage. These structures are built and maintained because they offer valuable storage, workshop or utility areas. There is no reason to believe that residents on PRNS ranchers have any different needs, thus we believe that some, and perhaps many of these out-buildings are actually in use for residential purposes and thus should have a rental value attached to them. Thus the EIS should assess having a rent appraisal for buildings in the ranch core used for residential purposes and locking up unused buildings to become part of the PRNS self-insured insurance program.

CORE #12: Past appraisals claimed that ranch core structures (with the occasional exception of hay barns) to be entirely surplus to ranching and thus no rent was charged. But when a PRNS ranch includes buildings that actually are used for ranch operations (or diversification), some rent should be charged. Thus the EIS should assess having a rent appraisal for buildings in the ranch core used for ranching or diversification purposes and locking up unused buildings to become part of the PRNS self-insured insurance program.

CORE #13: Use of a hay barn has advantages for a rancher: ability to buy in bulk at a time and price most advantageous or the ability to harvest and store hay. We note that some ranch permits include barn rental at \$0.35 per sq ft per year, while other ranches get free use of a barn. Further we can find no Appraisal justifying the \$0.35 per sq ft rental rate for hay barns. Thus the EIS should assess having a rent appraisal for hay barns used at every ranch and locking up unused barns to become part of the PRNS self-insured insurance program.

CORE #14: At least some buildings un-used by the on-site PRNS rancher could be used by other PRNS ranchers or PRNS or the public. Thus we request this EIS to assess carving such buildings out of the permit (as the McDonald-leased building were separated from the Murphy-leased buildings). This non-rental status would then trigger the NPS self-insured status and save the Seashore from renting these building to ranchers who cant use them but must insure them with that cost passed on dollar-for-dollar to the Seashore. S U C C E S S I O N C O M M E N T

SUCCESSION OVERVIEW: The enabling legislation speaks to Congress intent to allow sellers and lessors of ranch land at the time of sale to NPS to continue ranching and dairying. That intent is consistent with Secretary Salazars 2102 directive to NPs to consider the values of multi-generational ranching, but is absent from any current GMPA Alternative. Unfortunately, past ad hoc decisions that lacked uniformity between PRNS ranches and lacked public input on an overall policy have created a hodge-podge of unrealistic expectations and unworkable arrangements. PRNS has and must retain the discretion (with public input through this GMPA process and from existing permit holders) to determine whether (and if so to whom and under what conditions) PRNS would offer the opportunity to continue operating a PRNS ranch (should the current Permit holder retire or die). PRNS should start anew from a clean slate and go forward with a clear, transparent and uniform policy. Lack of such a policy in the past has created problems best exemplified by the incident at the former Horick ranch, where family disputes, counter claims and cross lawsuits left the dairy unattended and the surrounding lands un-managed at an ultimate cost to PRNS (and thus to the taxpayer). This should not be repeated. To that end:

SUCCESSION #1: Some current permits assign the permit to permittee and successors. Such open-ended language effectively eliminates the right of PRNS to determine who that successor will be in the event of a current permit holders retirement or death. Further, such open-ended language that could include no-family members as successors is inconsistent with Secretary Salazars directive to consider the values of multi-generational ranching. Thus we request this EIS to assess eliminating language in permits that assigned the permit to permittee and successors (or similar open-ended language).

SUCCESSION #2: Some current permits contain a list of immediate family members as successors. Such a laundry list is an open invitation to another Horick feud. Housing and operations are two different considerations&a ranch can be run without an owner on site (L Ranch, F Ranch) and conversely, the housing of a non-operator in a ranch core can also occur (Home Ranch). Thus we request this EIS to assess successor language in future permits that would specify which family member PRNS will look to (and hold responsible) for residential issues and which family member PRNS will look to (and hold responsible) for ranch operations.

SUCCESSION #3: The process by which successors are added to the permit should be at the written request of the current permit holder. Granting undocumented requests or requests by asserted successors are open invitations to another Horick feud. Thus we request this EIS to assess a formal documented process by which current permit holders can request that immediate family members be added to their permit as successors.

SUCCESSION #4: In the past, PRNS issued five or occasional ten-year permits, some of which listed successors. But now with 20-year permits, 20 years is too long for a successor to remain un-reviewed on a permit. Things and people change over 20 years and a family member who may have seemed an appropriate successor in year one may have since found a new profession, or moved in year 19. Thus we request this EIS to assess whether the family member successor should be on 5-year term document attached to the 20 year permit so that both the current permit holder and PRNS can re-assess the family member successor every 5 years.

SUCCESSION #5: Consistent with the enabling legislation, past practices at PRNS has been for to allow the original sellers and lessors of ranch land at the time of sale to NPS to request that PRNS allow an immediate family member to be listed on the permit as a successor. However, new operators have come into PRNS and some original seller/lessors may not have an immediate family member both acceptable to PRNS and willing and able to act as a successor. Thus we request this EIS to assess language in future permits that (in the event that the current Permit holder retires or dies) would specify either an individual, company, or bond to assist PRNS to (at the discretion of PRNS) either wind down or run out the remaining term of the permit.

SUCCESSION #6: Many environmental grants require that the applicant have at least 5 and sometimes 10 years remaining on the lease or permit for the land on which the environmental improvement will be made. Thus a 20 year lease renewed once every 20 years will be inadequate for the last 5 to 10 years of its term. Further, it would seem useful for PRNS (in addition to its yearly conferences/inspections of each ranch) to have a more robust review of the milestones expected to be achieved in each permit. Thus we request this EIS to assess renewing every lease at 10 year intervals to determine whether to renew the permit for another 20 years under conditions to be determined, or whether to wind down the permit for the remaining period and start afresh at its term end with a wholly new permit under possibly wholly new conditions.

Thank you for considering our requests for EIS to assess our suggestions in further detail. If the comment period had been longer, we would have had the time the make our comment shorter.

Gordon Bennett, President, Save Our Seashore

#1284

Name: Klingelhoffer , William

Correspondence: Please keep the current restrictions on bicycles to foster safer paths for hikers.

#1285

Name: Heagerty, Daniel

Correspondence: Scope of EIS

The NPS must articulate the purpose of establishing the PRNS in the context of the Public Trust Doctrine. What significance was assigned to Pt Reyes as a national seashore deserving National Park protections? How will NPS compare the alternatives against the Public Trust Doctrine, particularly in regards to the government's responsibility to future generation's rights and needs for healthy national seashores, especially given the quickly emerging threats from climate change?

The EIS must do a thorough analysis of the range of climate change impacts on native species, surface hydrology, groundwater supply/demand, forest health, water supplies for elk, fire, sea level rise, precipitation, native pollinators and related considerations. What climate impacts have already been witnessed or evaluated at the

Seashore, both naturally and those impacts associated with ranching? How will climate shifts change water availability for the elk? How will ranching, dairying and other farming activities increase water demands? What will a ten year severe drought look like re: water supplies to meet the wildlife needs, and the future agricultural demands?

What native species have experienced population or range declines at the Seashore over the past 25 years? What species have been impacted by the existing commercial operations, directly and indirectly? What species will continue to decline on Pt Reyes under each alternative? How will NPS restore the populations of the diminished species and the at-risk species under each alternative? What species are at risk of extirpation for each alternative?

How many ranches and dairies are not meeting federal or state water quality standards? If commercial activities have been exempted in the past, why? Will NPS enforce water quality compliance in the future? What will be different in monitoring and management of the water resources on the Seashore?

What are the GHGe emissions attributable to the commercial operations within the Seashore (stock, feed, water, transportation, etc)? What will be the future GHGe's under each alternative? What is the externalized costs of these GHGe's (ie cost to the public)? What will be the future economic costs, or value, of these emissions (carbon tax, offsets, other likely mandatory assessments for GHGe's)?

What are the full economic costs of the current agricultural operations to the public, in subsidized leases, various farm subsidies, property tax exemptions, public infrastructure (road damage, water systems, etc), NPS operations and management related to the lease lands, water quality non-compliance, public recreation and access limitations, etc. Under each alternative what are the public cost comparisons? What percentage of the local and Marin County economies result from the current commercial operations? What makes up the rest of these economies? For each alternative what are the economic benefits to be derived at the local and County levels? For each alternative what would be the relative public benefit per public dollar cost?

How many acres of federal lands in California are currently leased or rented for commercial grazing purposes, compared to the acres of grazing and dairying on federal Pt Reyes lands? What public values are provided at Pt Reyes that are not provided on the rest of the federal grazing lands in California?

How will each alternative meet future GHGe reduction requirements? Climate assessments (IPCC, NCA, CCA) are all pointing to the need for massive GHGe reductions. Meat and dairy demand reductions are widely considered appropriate climate mitigation actions. Under each alternative how will NPS make the necessary decisions, take the necessary actions, to effectively reduce GHGe's in 5, 10 and 20 years? How will NPS achieve offsets that may be required in the next 5, 10 and 20 years?

The EIS will need to provide detailed economic analysis of lease land operations, for the existing operations and for future scenarios. If the farm operations are (currently) risky economic enterprises how will future, expanded types of operations achieve financial viability? How does a 25-year lease provide financial security? In the future, won't each year pose the same or greater threats of drought, severe weather, beef and milk pricing, subsidy changes, more expensive feed, etc? What future issues could pose more public costs and/or additional operating liabilities? What future economic scenarios (re: these ranches and farms) would be in the public interest?

How will the NPS address the House bill Congressman Huffman authored that appears to direct the NPS to a particular alternative and ROD that would preempt the NPS General Plan guidelines and NEPA? Though Rep. Huffman refers to former Secretary Salazar's opinion that private ranching should be maintained, neither the Secretary nor Rep Huffman have provided any reports or findings (scientific or public interest information) that would support the opinion that long term leases are in the best interests of the public and the natural resources. Do private interests prevail over resource needs at Pt Reyes? The EIS should be clear as to how NPS will comply with the General Plan and EIS guidelines (and case law), how NPS will evaluate agricultural, non-agricultural and reduced agricultural alternatives equally, and how NPS will ultimately decide the preferred alternative. The enabling federal legislation clearly put a term on the commercial operations, Congress paid market rates for all the

subject properties, the intended lease terminations were clear to all parties, yet inexplicably there has evolved this "new narrative" that the public wants permanent commercial operations in the National Seashore. This presumption, or opinion, deserves disclosure and clarification in the EIS.

Will the General Planning and EIS processes abide by the settlement agreement reached by the Pt Reyes ranchers/farmers and Resource Renewal Institute et al?? The EIS should disclose the NPS decisions and actions concerning this issue.

Thank you for your dedicated work for Pt Reyes National Seashore

#1286

Name: N/A, N/A

Correspondence: I believe there is excellent potential for the local ranchers and the Point Reyes National Seashore park to coexist harmoniously going forward. To enforce a decision of turning the park into a wild nature preserve is misguided; particularly in light of the fact that there are some 2.5 million visitors a year. With that much foot traffic, this piece of land would not be considered pristine and protected wilderness. In fact, the land has been "worked" for centuries, so it's been a long time since it was "wild". Small, family-owned, and well-managed farms/ranches are vital to every community, and now more than ever. This community should continue to make an effort to keep the farms/ranches in tact, working, and financially prosperous, which can only lead to a positive and beneficial outcome for the local region, as well as for the many people from all over the world who come all year long to enjoy the park. Furthermore, with all of the new and permanent digital/informational and data gathering tools readily available to us, managing the ranches within this beautiful land should be far more efficient than it has been over the last several decades.

#1287

Name: Stewart, Sarah

Correspondence: We are writing to request that the Park Service to phase out dairy ranching in the park while allowing some beef ranching to continue. And most importantly, do not to remove or kill any elk.

Please stay with your mission to steward this national treasure and prioritize the protection of native wildlife at Point Reyes over agriculture and ranching.

When Congress established Point Reyes National Seashore in 1962, it made it very clear that the continued operation of commercial ranching was temporary. Yet the Park Service's preferred alternative would extend cattle ranching leases for 20 years and evict tule elk from all lease areas - by either shooting elk or relocating them out of the park.

The mission of Point Reyes is not for ranchers to grow crops in the park and introduce new livestock animals such as chickens, goats and sheep. If this happens there could be even more conflicts with native wildlife and lead to persecution of birds and predators such as bobcats, foxes and coyotes. This is bad for Point Reyes and its native wildlife.

We are asking the Park Service to phase out dairy ranching in the park while allowing some beef ranching to continue. And most importantly, do not to remove or kill any elk.

#1288

Name: Stewart, Mary

Correspondence: I am writing to request that the Park Service to phase out dairy ranching in the park while allowing some beef ranching to continue. And most importantly, do not to remove or kill any elk.

Please stay with your mission to steward this national treasure and prioritize the protection of native wildlife at Point Reyes over agriculture and ranching.

When Congress established Point Reyes National Seashore in 1962, it made it very clear that the continued operation of commercial ranching was temporary. Yet the Park Service's preferred alternative would extend cattle ranching leases for 20 years and evict tule elk from all lease areas - by either shooting elk or relocating them out of the park.

The mission of Point Reyes is not for ranchers to grow crops in the park and introduce new livestock animals such as chickens, goats and sheep. If this happens there could be even more conflicts with native wildlife and lead to persecution of birds and predators such as bobcats, foxes and coyotes. This is bad for Point Reyes and its native wildlife.

I am asking the Park Service to phase out dairy ranching in the park while allowing some beef ranching to continue. And most importantly, do not to remove or kill any elk.

#1289

Name: Stewart, Chris

Correspondence: My family and I are writing to request that the Park Service to phase out dairy ranching in the park while allowing some beef ranching to continue. And most importantly, do not to remove or kill any elk.

Please stay with your mission to steward this national treasure and prioritize the protection of native wildlife at Point Reyes over agriculture and ranching.

When Congress established Point Reyes National Seashore in 1962, it made it very clear that the continued operation of commercial ranching was temporary. Yet the Park Service's preferred alternative would extend cattle ranching leases for 20 years and evict tule elk from all lease areas - by either shooting elk or relocating them out of the park.

The mission of Point Reyes is not for ranchers to grow crops in the park and introduce new livestock animals such as chickens, goats and sheep. If this happens there could be even more conflicts with native wildlife and lead to persecution of birds and predators such as bobcats, foxes and coyotes. This is bad for Point Reyes and its native wildlife.

We are asking the Park Service to phase out dairy ranching in the park while allowing some beef ranching to continue. And most importantly, do not to remove or kill any elk.

#1290

Name: N/A, N/A

Correspondence: Improved bicycle access on Pt Reyes should be a priority. I regularly use the Cross Marin trail but it needs to be extended to Pt Reyes Station because the vehicular traffic is often dangerous to cyclists. I live in Davis where we have prioritized bike infrastructure . Pt Reyes Seashore needs more bike access. Considering how much space there is in the park , there are relatively few options for cyclists. Hikers and equestrians have much better access, which does not serve the community.

#1291

Name: Nunes, Tim

Correspondence: Dear Superintendent:

Thank you for this opportunity to provide comments on the 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 support the letter submitted by the Point Reyes Seashore Ranchers Association (PRSRA) dated November 20, 2018 and we will participate fully in subsequent stages and opportunities to discuss the future of GMP and EIS processes. We fully support continued ranching in the Point Reyes National Seashore. We are continually committed to land stewardship, conservation and resource management through our ranching efforts.

We also would like to take this opportunity to add that our family and current lease holders continually pledge our commitment to our current practices of dairy and cattle ranching on our leased land in the project area. Seeing as it is a family legacy of nearly 100 years, it is important to us to do what we can to continue our family's tradition and legacy in the dairy and cattle industry. However, with the up and coming generation of successors in our family sitting on the horizon, we also want to take this opportunity to discuss innovative ideas and dreams of diversification for the future. So with that, we wish to request your review and consideration of our desire for diversification of crop production on the Historic A and E ranches. We would like to propose a diversification of our current practices to possibly one day adding on-farm quinoa production. We envision that the quinoa production would take place on areas of our operation at the Historic E ranch that we previously utilized for silage production as these areas have been farmed before. The soil varieties in these areas are desirable for cropping and it would be the least invasive to native species of plants and animals that reside in our leased portion of the project area.

A little background on Quinoa: quinoa is a seed designated for human consumption that originated in the Andes Mountains. It thrives in cool coastal climates, benefits the environment, and wildlife. Quinoa helps increase soil organic matter, water infiltration rates, cation exchange capacity, increases the variety of soil organisms, replenishes nutrients in the soil and helps reduce erosion. This is due to the left over stalks and chaff from harvest since only the heads produce seed and are harvested. The stalks are then mowed and incorporated into the soil. Wildlife also benefit from quinoa. Quinoa is a great source of nutrition for birds, rodents and deer, helps provide cover for deer, coyotes, bobcats, raccoons etc, and helps attract a wide range of animal species. Quinoa is planted during early spring and harvested during fall. Migrating bird species such as the mud swallow can benefit from increased insect concentration around quinoa fields, and can help harbor a safe corridor from predators for animals to have their offspring.

Along with environmental benefits, the ability to grow Quinoa would help keep our business stable and contribute to the agriculture heritage in Marin County producing high quality products. Diversification is key to long term success and helps to sustain a financially viable life on the ranch and opportunity to strengthen the economy in the area. Please consider our ideas when evaluating options for diversification in the upcoming EIS/General Management Plan creation.

Lastly, we encourage the EIS/GPM Amendment process to evaluate the elk population thresholds stated in Alternative B: Continued Ranching and Management of the Drakes Beach Tule Elk Herd and propose reducing the population thresholds for this herd to a minimum of 60 animals and maximum of 100 animals (average 80 animals) to lower the overall elk-related impacts to ranch operations like, fencing, forage consumption which threatens our USDA NOP Organic status, disease introductions, etc.

We look forward to continued communication with PRNS. 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,

Tim Nunes and Family

#1292

Name: N/A, N/A

Correspondence: Please do not open this beautiful park to cyclists. The cyclists will destroy the trails with their high speeding, skidding fast stops. More accidents are likely to happen since the majority of these people wear headphones and can't hear the public approaching. I have observed these rude people and have had one two many accidents with them. Time and time again I have observed cyclists on trails not open to them. Please protect this beautiful park from these people.

#1293

Name: Ryason, Arne

Correspondence: Cherry stem all former ranch roads out of the Wilderness designation so we may ride our bicycles there again. The initial presence of roads, and the history of the area as a collection of dairy ranches, a land stolen from the Coast Miwok people, an entirely anthropogenic landscape, should disqualify the area as "Wilderness."

https://web.sonoma.edu/gep/ensp/docs/faculty_papers/watt_-_the_trouble_with_preservation.pdf

Wilderness areas are for the "use and enjoyment of the American people." As an American citizen, my use and enjoyment of Point Reyes National Seashore was practically outlawed in 1984, when the definition of mechanical transport changed from having a non-living power source to anything which has moving parts. All ranch road and trail through-routes were closed to bicycle riding.

My first bicycle trip to Point Reyes, with two friends in 1972, was entirely under our own power. We camped at the private campground in Olema. We unloaded camping gear from our bicycles, and rode them all the way down Bear Valley Road to the coast. Subsequently I rode through there many times, under my own power, from the San Anselmo-Fairfax area to Point Reyes, up or down Coast road/trail or other varied routes, then home in one day. I did not burn any fossil fuel on those trips, but now that is illegal.

Bicycles travel further per day, use fewer campsites, build fewer campfires, disposing of less human waste and manure, than hikers or equestrians. Bicyclists stay on trails. Without a trail, the bicycle is ballast. On foot I can go wherever I want, and set up camp wherever I want. A bicycle weighs around thirty pounds, and is very difficult to drag through the brush. The Wilderness Act states that humans should be "visitors who do not remain." The human on a bicycle fits that definition better than any other mode of transport. The bicyclist is more likely to stay on the trail, and not need any costly facilities like campgrounds. If I still lived there, I would pay up to \$100 per year for an annual Seashore pass, If I could ride all of the former ranch roads and trails that I could before 1984. I'm sure I'm not the only bicyclist who would gladly pay this.

#1294

Name: N/A, N/A

Correspondence: I have been a long time visiter of Point Reyes National Sea Shore - -for over 30 years I have been there multiple times per month.

I am not in favor of any commercial business in the park and feel the leases should be terminated and the land turned back to how it was prior to the agricultural interests. We must urge our senators to rule against Bill HR6687. national Parks are meant for protecting the plants an animals for all Americans and should not be reprioritized for a few farmers. We have made progress with the Drakes estero now lets finish the job by removing the agricultural interests.

Priority should be given to the native plants and animals including the native Tule Elk. The tule elk should be prioritized over any agreed agricultural interest and should not be moved to given to "native americans" to be moved. These "native americans" are like all of us and live in modern homes, with modern lives, with modern interests like casinos. They should not be given the Tule elk over any other American.

I am also against significant expansion of roads or paths that circumvent abbots lagoon or any other area as many migratory birds and animals would be impacted by such roadways and bike trails.

All efforts should be to encourage a natural area. Less buildings, less electricity and traffic unrelated to tourism should be the goal.

I am totally against "managing" the Tule elk in response to the proposed bill. If the farmers cannot coexist with our native animals they should actually leave and abide by their leases.

#1295

Name: Mitchell, Bruce

Correspondence: After looking at the various options the Park Service has offered in its 2018-11 EIS for the future of ranching in the Seashore, I want to see all of the elk in the herd that is living in the Pastoral Zone near Drakes Beach to be permanently removed. They have and will continue to have a detrimental effect on ranching operations there. I also want the ranchers to be given full 20 year leases so they can have the financial security to obtain much needed loans to update equipment, housing and infrastructure vital to their operations.

If the Park Service had abided by the mandate in the 1998 Elk Management Plan which requires all elk that wander into the Pastoral Zone from the Tomales Point Elk Preserve to be removed, the problems ranchers are having wouldn't have occurred in the first place. Those problems include torn up fences, cows being gored to death by bulls in rut and pasture being eaten by the elk that the organic ranchers are required to have in reserve to maintain their organic certification. It is time for the Park Service to follow the dictates of its own Elk Management Plan from 20 years ago.

Sincerely,

Bruce Mitchell

#1296

Name: Dommen, Kristi

Correspondence: Thank you for the opportunity to comment. I love being outdoors hiking, biking, camping, exploring and walking the beach. I am excited about the prospects of being able to safely ride my bike off the paved roads and accessing places currently only available to foot travel. My bike is the replacement of the horses I rode since childhood, and can no longer afford to have. The similarities are uncanny, yet mountain bikers have very limited access to off road riding. I also work with individuals with physical or developmental disabilities. Being able to ride a tandem bike with a physically capable person on trails historically only available to "foot travel" would greatly enhance the quality of experience in Point Reyes and on GGNRA lands. Are we inadvertently limiting access to "A Natural Sanctuary, A Human Haven" when those with wheels must stay on a hardened or paved surface?

I have lived in Marin for 26 years and new mountain bike opportunities in Point Reyes Seashore and on GGNRA lands are missing. It is time to review current connectivity gaps and loop opportunities for mountain biking, for young and old visitors. Our mountain bike community is one that brings a "can do spirit," ready, willing and able to voluntarily contribute sweat equity to help develop, build and improve trails. In doing so, we can help minimize the financial burden of increasing trail access. I know I am ready to help!

These are some of the access improvements I would like to propose and see developed:

A new trail between Devils Gulch and Platform Bridge through the Cheda, McIsaac, and Zanardi Ranches.

A plan to connect the Cross Marin Trail into Point Reyes.

Adoption of social trails off Bolinas Ridge for better connectivity and a single-track trail experience.

Extend the Olema Valley Trail to Bolinas on the east side of Highway 1.

Close gaps for bikes through ranch lands in the park, including closing the Estero Trail loop, connecting Sir Francis Drake Blvd. with Pierce Point Road, and connecting Marshall Beach to Pierce Point Road,

Bike access to all ranch roads in the pastoral zone that are already open to pedestrians.

Again, thank you for the opportunity to comment.

Kristi Dommen

#1297

Name: Painter, Michael

Correspondence: November 30, 2018

Ms. Cicely Muldoon Superintendent Point Reyes National Seashore 1 Bear Valley Road Point Reyes Station, CA 94956

via online comment form

Scoping Comments by Californians for Western Wilderness on the General Management Plan Amendment for Point Reyes National Seashore

Dear Ms. Muldoon:

I am writing on behalf of the more than 885 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. Many of our members specifically visit Point Reyes to hike, enjoy wildlife and birdwatching, and engage in photography.

We appreciate this opportunity to comment on the General Management Plan Amendment for Point Reyes National Seashore.

I grew up in Marin County and lived there for 36 years before moving to San Francisco. I continue to visit Point Reyes frequently still. I have visited Point Reyes National Seashore since I was a baby: Tomales Point, McClures Beach, Kehoe Beach, Abbotts Lagoon, Point Reyes Beach (North & South), Drake's Beach, Chimney Rock, the Lighthouse, Drakes Estero, Mt. Vision, Limantour Beach, Bear Valley, Arch Rock, Five Brooks, Palomarin. In Boy Scouts, our troop did a weekend cleanup of the historic Coast Guard Cemetery and the cross at Drakes Bay commemorating Drake's landing there in 1579. These are all places I am familiar with. My parents were early supporters of the legislation to establish the Seashore in 1962.

The introduction to that legislation reads:

"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 ... is authorized to take appropriate action in the public interest toward the establishment of the national seashore."

Nowhere is preserving dairy ranching or cattle mentioned as a purpose for which the Seashore was established, either as a historic or commercial use. In fact, in 1978 legislation was passed which allowed for the buy-out and lease-back of the ranches, with terms to be for the life of the rancher (or their spouse) or 25 years, whichever was longer.

It was long the common understanding that dairy ranches would eventually be phased out in the Seashore. But now there has developed a revisionist history campaign, claiming it was always the intent of Congress to allow ranching to continue indefinitely at Pt. Reyes. That is simply not true.

Therefore, we support Alternative F: No Ranching and Expansion of Tule Elk in the Planning Area as the best action. (In fact it is troublesome that before scoping was even begun the NPS had already chosen a Proposed Action, Alt. B.) Alt. F should be developed much more fully to include an active native habitat restoration component for lands that are now used for ranching. And the Park Service should then adopt that Alt. F as developed.

In addition to our belief that the law requires a phase-out, there are on-the-ground environmental reasons for eliminating ranching. Cattle and dairy ranching contribute to manure pollution in Drakes Estero and Abbotts Lagoon. These operations seriously degrade habitat that native wildlife could otherwise be using (including threatened and endangered species). The heavy trucks have turned the roads on the Peninsula into tracks of potholes. (I drove out to the Lighthouse on Friday, November 23, 2018 and was appalled at the condition of the road. The rain had turned many road areas passing through ranches into mud-covered asphalt and mud puddles. In addition we had to stop and pull over to the side to allow a dairy tank truck to pass us going the opposite direction.)

Regarding some of the other alternatives:

Alternative C, "Continued Ranching and Removal of the Drakes Beach Tule Elk Herd," should not be considered under any circumstances. It is antithetical to the purpose of a national park. The elk got to Drakes Beach by naturally expanding their range. That's the way wildlife functions in a normal ecosystem. Wildlife should take precedence over agriculture in a national park. Removing them will simply make habitat available for other elk from the Limantour herd to expand into, just as the Drakes Beach herd started originally. It's a "vicious circle" and an expensive and futile one, as well. The Park Service must address and answer the questions: How much will this cost? What are the benefits to the public (not just the ranchers)?

Alternative B, "Continued Ranching and Management of the Drakes Beach Tule Elk Herd (NPS Proposed Action)" The language quoted in the Scoping Newsletter, "Explore opportunities for ranch operational flexibility and diversification . . ." is extremely troublesome.

Under no circumstances must new types of agriculture, such as poultry raising or the growing of vegetables or row crops for commercial sale, as well as on-site sales of any such produce be allowed. Some new uses, such as raising sheep or turkeys or chickens are guaranteed to provoke conflicts with predators, such as bobcats or coyotes. Then we will have the familiar refrain that predator control is necessary, creating another headache for the Park Service and the public, too.

Furthermore, no new buildings or other infrastructure should be allowed to support this diversification.

The legislation establishing the Seashore did not provide for increased levels in the future, and the fact that restrictions were placed on the subsequent ownership within families, etc., indicates that levels of commercial agricultural use were expected to decrease over time, by retiring leases or simple attrition as family members left

or died. Other commercial activities such as opening bed & breakfast-type lodgings must also not be permitted. These have no place in a national seashore, especially one that did not have them before its establishment.

Again the Park Service must address answer the questions: How does this comply with the legislation establishing the Seashore? How does this comply with the overall philosophy and mission of the Park Service and national parks & seashores? What are the benefits to the public (not just the ranchers)? Is that benefit outweighed by the cost to visitor appreciation of the landscape and the cost to wildlife?

The growing of silage in the Seashore should likewise be prohibited. Mowing causes injury to populations of ground-nesting birds and other wildlife.

For all alternatives, the Park Service must analyze and answer the question: What is the benefit to the general public and not just the private ranchers? Furthermore, for each, how does that alternative comply with the fundamental purpose of the Seashore and the National Park System as a whole, most succinctly expressed in the Park Service Organic Act:

“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.”

Keeping commercial ranching in the Seashore does not comply well with that requirement. It should, therefore, be phased out.

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.

Sincerely, Michael J. Painter Coordinator

#1298

Name: Quinn, Ryan

Correspondence: Thank you for the opportunity to comment. The mountain bike user group has rapidly expanded to over 40% of all trail users, however, new mountain bike trail opportunities in the Point Reyes Seashore and on GGNRA lands have not been provided. It is time to provide mountain bikers with new trail access opportunities. Some access improvements that I would like to see developed are the following:

- 1) Adoption of social trails off Bolinas Ridge for better connectivity and a single-track trail experience.
- 2) A more bike-friendly permit application process for road and mountain bike events in the park, including along Bolinas Ridge and out to the lighthouse.
- 3) A new trail between Devils Gulch and Platform Bridge through the Cheda, McIsaac, and Zanardi Ranches.
- 4) A plan to connect the Cross Marin Trail into Point Reyes.
- 5) Extend the Olema Valley Trail to Bolinas on the east side of Highway 1.
- 6) Close gaps for bikes through ranch lands in the park, including closing the Estero Trail loop, connecting Sir Francis Drake Blvd. with Pierce Point Road, and connecting Marshall Beach to Pierce Point Road,
- 7) Bike access to all ranch roads in the pastoral zone that are already open to pedestrians.

Again, thank you for the opportunity to comment.

#1299

Name: Morin, Gail

Correspondence: Regarding allowing access by mountain bikers to the Pt. Reyes National Seashore and Park, please consider the unique nature of this park and why it should be treasured now so that it will be intact for all future generations of Americans. I have never seen a trail in any area that allows access to mountain bikers that does not become degraded and ruined by the very nature of a mountain bike's large tires, the force with which such a biker engages with the trail surface, not to mention what happens when a biker encounters another user, someone on foot or on a horse. In general the biker does not stop, wanting to maintain momentum, and may even go off of the trail in order to avoid the other user(s), thus destroying even more shrubs, bushes, trees, plants, etc. Plus the hiker has to worry about fast moving bikes coming up from behind or coming towards him/her, when the biker is in the park specifically to enjoy the tranquility of nature in its intended state of being. Thank you for considering my input. Please do not allow this to happen to this special park.

#1300

Name: Spotts , Richard

Correspondence: I am appalled to learn that Congressman Huffman has harmful legislation that reportedly passed the House and is pending in a Senate Subcommittee for a hearing next week. This legislation would apparently mandate continued livestock grazing and dairy operations in Point Reyes National Seashore. If enacted, it would circumvent the current NPS NEPA process and associated public input on the central issues of concern. It would substitute Congressional fiat for the objective NEPA analysis and normal NPS decision making process. This would create a horrible and dangerous precedent to undermine NEPA and frustrate public involvement. I expect bad things from Republicans but not from Democrats like Huffman.

I do not support continuing livestock grazing and dairy operations in Point Reyes National Seashore. Most public lands in the West already have livestock grazing as a primary use. NPS lands should be the exception. Tule elk and other native species should be fully protected on NPS lands.

Please put fidelity to law and best science well above the political fray. You work for all Americans in the public interest.

Thank you very much for your consideration.

#1301

Name: Hemmingway, Nancy

Correspondence: Dear Pt Reyes National Seashore,

I would like the ranches to be able to stay within the National Seashore. I urge you to grant each ranch the ability to extend their leases by at least 20 years so they are able to obtain loans and to plan ahead. Please restrict the elk herds to the McClures section of the park and limit the size of the herds so that there is no overgrazing. I have lived in the Pt Reyes/Inverness area since 1971 and feel that the ranches and ranch families are an asset to our communities. I also appreciate having the cows keep the buck brush down so the wild flowers can survive.

Thank you for this opportunity to voice my opinion.

Sincerely, Nancy Hemmingway

#1302

Name: Musselman, Jim

Correspondence: Dear National Park Service,

I favor "ALTERNATIVE F: NO RANCHING AND EXPANSION OF TULE ELK IN THE PLANNING AREA", which I found described on the NPS website at <https://parkplanning.nps.gov/document.cfm?documentID=91640>. The best way to protect our environment is to prioritize the well-being of the wild indigenous tule elk and other native indigenous plants and animals that live at Point Reyes. The preservation of these last vestiges of our California elk herd is way more important than providing ranchers the opportunity to commercially raise cows and cattle at Point Reyes. The protection of our wilderness and our native wildlife deserves the highest priority. The raising of domestic cattle for commercial purposes deserves the lowest priority when it comes to the management of the GGNRA and Point Reyes.

Sincerely, Jim Musselman

#1303

Name: Jones, Jaime & Angela

Correspondence: Please help the Elk! We are California residents and we strongly oppose allowing ranchers to graze cattle on our public lands. This is an outdated model and a giveaway to cattle ranchers, it has no benefit to the public and is a detriment to the wildlife on these lands. It is time for the Bay Area to show an enlightened way forward. Now, more than ever, we need to regenerate our ecosystems and protect wildlife habitats, and this precludes grazing livestock. It is a no win for the public to continue to give away the public commons to select private interests. Please let California stand for prioritizing the environment over private commercial industry. We recently had the good fortune to see a small herd of Tule Elk and these magnificent were amazing and need our help to repopulate for the Earth and future generations.

#1304

Name: N/A, N/A

Correspondence: I support the following projects:

A new trail between Devil's Gulch and Platform Bridge through the Cheda, McIsaac, and Zanardi Ranches.

A plan to connect the Cross Marin Trail into Point Reyes.

Adoption of social trails off Bolinas Ridge for better connectivity and a single-track trail experience.

Extend the Olema Valley Trail to Bolinas on the east side of Highway 1.

Close gaps for bikes through ranch lands in the park, including closing the Estero Trail loop, connecting Sir Francis Drake Blvd. with Pierce Point Road, and connecting Marshall Beach to Pierce Point Road,

A more bike-friendly permit application process for road and mountain bike events in the park, including along Bolinas Ridge and out to the lighthouse.

Bike access to all ranch roads in the pastoral zone that are already open to pedestrians.

#1305

Name: Holden, John

Correspondence: I am a bike rider myself and hiker. I strongly recommend more restrictions on bikes and access. Enforcement is non existent and will never happen. Many bike riders don't care and ride where they want and play dumb. (did not see sign) They barrel through. And ruin the nature energy. We even have Drones on Mt Tam flying everywhere and no restrictions. We do not need our peaceful places overrun with bikes and bikes drones and whatever else. The monster tires on these things now are unbelievable like motorcycle tires. NO WAY STOP THE PIECE BY PIECE TAKING OF NATURE'S PEACEFUL SPACE. The Japanese call it forest bathing we need the stillness

#1306

Name: Cooper, Robert

Correspondence: Though I live in Livermore, I ride in Point Reyes extensively, nine days last October. I am the Marin Horse Council Committee Chairman for Stewart Horse Camp.

Stewart Horse Camp has been operating since 1962. The facilities were built by the Stewart family at their expense. It has been a popular horse camping facility since that time. The two weekends I camped there in October this year, there were over 60 campers each weekend. Equestrians come mainly from Northern California but there are people from Southern California, Nevada, Oregon, and Washington that have camped there. I have met them.

The first priority is to keep Stewart Horse Camp open for the 2019 season by finding a replacement for the recently retired concessionaire, Amanda Stewart. This, I understand, is in the works.

The second priority is to complete the ten year prospectus for 2020 - 2029 seasons and find a concessionaire for that contract.

The third priority is to update the facilities which are nearly original. Point Reyes National Seashore has a HEAVILY USED horse campground that is RENOWNED in the western states but the park has not invested any substantial money to update the campground. The campground deserves to be updated.

The bathroom / shower house is adequate but quaint. A new facility needs to be constructed in the main meadow of the campground. The entrance bridge over the creek needs to be replaced.

Other features that most other horse campgrounds have are paddocks and manure bunkers. Both help minimize the environmental impact of horses and their manure.

#1307

Name: Holden, John

Correspondence: I am a bike rider myself and hiker. I strongly recommend more restrictions on bikes and access. Enforcement is non existent and will never happen. Many bike riders don't care and ride anywhere they want and play dumb. (did not see sign) They barrel through. And ruin the nature energy. We even have Drones on Mt Tam flying everywhere and no restrictions. We do not need our peaceful places overrun with bikes, bikes and drones and whatever else. The monster tires on these bikes now are unbelievable like motorcycle tires. NO WAY STOP THE PIECE BY PIECE TAKING OF NATURE'S PEACEFUL SPACE. The Japanese call it forest bathing we need the stillness

#1308

Name: Holden, John

Correspondence: I am a bike rider myself and hiker. I strongly recommend more restrictions on bikes and access. Enforcement is non existent and will never happen. Many bike riders don't care and ride anywhere they want and play dumb. (did not see sign) They barrel though. And ruin the nature energy. We even have Drones on Mt Tam flying everywhere and no restrictions. We do not need our peaceful places overrun with bikes ebikes and drones and whatever else. The monster tires on these bikes now are unbelievable like motorcycle tires. NO WAY STOP THE PIECE BY PIECE TAKING OF NATURES PEACEFUL SPACE. The Japanese call it forest bathing we need the stillness

#1309

Name: Hemphill, Pam

Correspondence: I am writing to protest the extension of grazing rights on our public lands. I think that the dairy cattle at the Point Reyes National Seashore need to be phased out very soon. The area is for all of us to enjoy and protect yet the grazing degrades the land. There is no good rationale to continue this commercial operation.

I have hiked at Point Reyes for many years, enjoying the tule elk on the Tomales Point trail, but not enjoying the deep footprints of the cows in the soil, or the manure that I step on. The grazing degrades the land. The tule elk belong there, but the dairy cows don't. California has plenty of dairy for those who still drink cow's milk, so these operations do not have to take place on beautiful lands that are for all of us to enjoy.

I have also volunteered at Point Reyes, removing invasive plants, to help restore the land. The Point Reyes National Seashore is a wonderful place.

Please phase out the grazing rights and make Point Reyes even more beautiful. Thank you! Pam Hemphill

#1310

Name: N/A, N/A

Correspondence: Comment from Roch LeBlanc, Bay Area resident, frequent visitor to Point Reyes since 1990 and UC California Naturalist.

I strongly support the stated goals of the National Park Service Environmental Impact Statement under the General Management Plan (GMP) Amendment for the Point Reyes National Seashore (PORE) to "strive to improve hiking, biking, and equestrian access to the planning area" and to collaborate "with ranchers and other partners to interpret the story of ranching in the park.". The GMP Amendment presents a unique opportunity to create a connected trail linking the entire park thereby enhancing the enjoyment of the park for everyone.

The following planning elements should be considered:

- Connecting the northern and southern sections of PORE to create a contiguous long-distance trail system
- Adding signage and interpretative trails highlighting the historic and cultural significance of points of interest in PORE such as working ranches where visitors see dairy and beef ranching operations and interpretive signs explaining the importance of the historic sites such as the KPH Maritime Radio Receiving Station and Life Boat Station cemetery
- Making clear that open spaces are accessible to the public even on land where cattle fences are present
- Protecting natural habitats, cultural and archaeological features and avoiding interference with agricultural operations

#1311

Name: Lengyel, Sandor

Correspondence: Please accept my comments for the Point Reyes EIS scoping-

I strongly support the expansion of hiking and bicycling access within the GMP Amendment planning area.

As a 40-year resident of Marin County I have always wanted to explore some of these areas but have been effectively barred from public access. In particular, I've longingly looked at the hills on the east side of Sir Francis Drake Boulevard (from Devils Gulch to Nicasio Reservoir) and always wanted a continuation of the Cross Marin Trail into Point Reyes Station. The public has been effectively locked out of large swaths of Marin's public land that would be compatible with mixed recreational/agricultural use. There are many areas where increased public access would be compatible with the NPS mission.

Increasing connectivity for non-motorized recreational use should be a priority within the current scoping documents.

I fully support the projects proposed by the Marin County Bicycle Coalition (MCBC). Bicycle connectivity across Marin's open spaces is poor at best for bicyclists. All of MCBC's proposed projects are reasonable and close existing connection gaps on NPS lands.

As a 30 year cyclist in Marin, I've become increasingly concerned about bicyclist safety on Marin's roadways. In the last ten years, cell phones and other electronic distractions have made roadways less safe for cyclists and pedestrians. We regularly see people crossing the fog line onto the shoulder or crossing the centerline when they check their cell phones. Most of the other cyclists in my peer group are actively trying to limit riding on Marin's narrow shoulderless roads. We are increasingly looking for dirt routes to increase our safety while bicycling. Distracted driving is a reality and will continue to get worse. Increasing off road bicycle routes and closing connection gaps across Marin's public lands is one way NPS and other land managers can help with bicycle/pedestrian safety.

I want to voice my particular support for some projects as outlined in MCBC's proposals-

Cross Marin Trail extension to Point Reyes Station: The extension of the Cross Marin Trail from Platform Bridge to Point Reyes Station would close a critical non-motorized connection gap. This would create a beautiful, family friendly beginner level trail from San Geronimo Valley to Point Reyes Station. I have had many close encounters on Pt. Reyes-Petaluma road. On at least three occasions I've come within inches of being hit by speeding cars and trucks on that section of road (while pressed up against the shoulder).

Continuation of Olema Valley Trail to Bolinas: As with the Cross Marin Extension, this project would provide a safe passage along the Highway 1 corridor. Olema Valley Trail also needs some realignment to meet modern environmental standards. In the winter and spring, it is often very muddy (mostly due to poor alignment and environmental controls). Tourist traffic on highway 1 continues to increase. Creating a continuous bike legal route would increase safety for bicyclists. There isn't a compelling reason why a bike legal dirt route from Olema to Bolinas shouldn't be in the plans here.

Creation of a route from Devils Gulch to Platform Bridge and/or Nicasio Reservoir. This route would provide new recreational loops for cyclists, trail runners and hikers. I've wanted to explore this area for more than 30 years.

Existing ranch roads that are open to pedestrian use should also be open to bicycles.

I have one major issue about language in the scoping documents. The document reads: Potential routes would primarily use abandoned or administrative roads (including ranching roads); new trail construction would be very limited. The scoping documents should eliminate new trail construction would be very limited. Scoping

documents should include a process for proposing and building new generation environmentally sustainable trails where appropriate.

Many ranch/fire/administrative roads are poorly suited for recreational use. Legacy unpaved roads were rarely built with recreational experience or environmental sustainability in mind. Marin is full of ranch roads that are poorly routed, over grade, environmentally unsustainable, highly eroded, and not intended for outdoor recreation. Many ranch and administrative roads were follow a path of least resistance bulldozer alignment. They were built at a time when re-grading via bulldozer (to fix constant erosion) every year or two was the norm. Grade, erosion, long term sediment, and outdoor user experience were not considerations in the initial construction of legacy ranch roads. They rarely meet modern environmental and recreational criteria. Long term costs of maintaining these roads (or hardening them to minimize erosion) is often more than building sustainable alternatives. Non-motorized outdoor user groups should not be relegated to second class status and forced to accept legacy roads as the only access.

EIS and Scoping documents should include a process to build recreational trails as necessary to fulfill the dual use of ranching and non-motorized recreation. The goal of recreational access should be to provide outdoor users with the most visually stunning, interesting, environmental sustainable trails possible. Limiting the scope of the project to adopting legacy bulldozer roads is unreasonable. The first person with a bulldozer should not determine the path of human travel for the next 150 years!

Thank you for accepting my comments.

Sandor Lengyel

#1312

Name: N/A, N/A

Correspondence: Spaletta Dairy Historic C Ranch

Point Reyes GMP Amendment EIS Superintendent Point Reyes National Seashore 1 Bear Valley Rd Point Reyes Station, CA 94956

RE: EIS Comment

Dear Superintendent:

Our family appreciates the opportunity to comment on the GMP Amendment EIS process. Our family has been farming and ranching on the Point Reyes Peninsula for multiple generations, prior to the establishment of the Point Reyes National Seashore. We wish to continue to farming and ranching for future generations in partnership with the NPS.

We support the Community Alternative attached to the Point Reyes Seashore Ranchers Association comment letter and cited in the paragraph below. We support this alternative because we feel each alternative set forward in the GMP Admendment contains some subject and/or strategy which would be detrimental to our family farm.

The Community Alternative is as follows:

Community Alternative: Continued Ranching and Manage Elk for Effective Separation from Ranches

Based on the purpose and need for action, the Community proposed action includes the following elements:

" Issue agricultural lease/permits with up to 20-year terms to existing ranch families to continue beef and dairy and associated agricultural operations on approximately 27,000 acres within the planning area.

" 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 Commissioners 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.

" Explore opportunities for ranch operational flexibility and diversification, establish up to approximately 900 acres of collaboratively managed resource protection buffers, and provide a programmatic review and approval process for operational flexibility, diversification and best management practices.

" Tule elk would be managed for effective separation from ranches. No elk herds would be allowed to establish in the planning area.

" The NPS would implement a strategy prioritizing maintenance of historic buildings on ranches in collaboration with seashore ranchers. Prioritization would take into account historic preservation goals and the needs of ranch operations. In some cases, adaptive reuse of historic buildings would be considered to support diversification activities.

" NPS would implement strategies to remove non-native, invasive plants and to manage special status plants in collaboration with seashore ranchers.

" Strategies for the management of historic ranch complexes within the planning area but not part of currently active ranch operations would be identified including: prioritization of specific buildings, structures, and landscapes for preservation based on their importance to the overall integrity of the historic district and opportunities for adaptive reuse. As appropriate, the seashore would evaluate potential for decommissioning/deconstruction of low priority or substantially degraded structures/complexes as part of this plan.

We do not fully agree with the proposed Alternative B. We appreciate the issuance of 20 year lease/permit terms. However, would like to make sure that the lease/permit options are also on a renewable basis for 20 years or more at a time. The renewable leases would allow for multi-generational farming, capital investments to improve infrastructure and decrease greenhouse gases, as well as provide security for farmers and ranchers. The feeling of security will motivate ranchers and farmers to improve and manage their properties better.

We would also like to encourage succession planning in this process as well as the ability to have an eager new farmer or rancher the ability to take over a lease or permit. Our goal is to pass the farm to the next generation; however, if that future generation wishes to not continue in agriculture, our wish would be that a young farmer or rancher would have the opportunity. The investment costs to start a farm your first year is impossible to overcome as a brand-new farmer. Many years farms or ranches break-even or farm/ranch at a loss.

We feel that a committee made up of experienced local farmers/ranchers, well-trained staff from local and regional Agricultural agencies as well as local environmental groups, and the NPS to discuss issues, visitor and community needs, and new advances in research/technology for improvements to the seashore including the agricultural zone would be very beneficial to all involved. Open discussion between diverse groups of various opinions and backgrounds is often rare. We appreciate the past community round tables and feel they were very beneficial to understand all sides. We feel the continuation of a round table like committee would help when new issues arise and offer opportunities for improvements.

We encourage the NPS to work with local agencies including MRCD, NRCS and the UCCE to streamline improvements including fencing, riparian areas, and water sources. The more streamlined the process is, the

quicker the positive impact to the local environment and eco-system. We would like to move forward with projects including carbon farming to reduce overall greenhouse gases, fencing off riparian areas and improvements to the land and soil. We would also like to repair and improve current and past water ponds as well as install more water troughs. The water ponds and troughs are sources of fresh water for not only our cattle, but migrating birds and local wildlife.

We appreciate the opportunity to be able to diversify our agricultural operation. The feasibility of agricultural commodities is constantly changing with the seasons, consumer trends, and most recently with trade tariffs. Currently there is a surplus of Organic Milk in California due to large scale operations from the California Valley and from out of state joining the niche. Substitute products including those made of Almonds, Coconut, and Soy have disrupted the market and reduced the demand for the real milk product. This simply means the value of excellent quality Organic milk is on a downward scale. Diversification allows us and our neighbors to evolve and adapt to an ever changing environment and economy. It also allows for improvement of the local eco-system and rural landscape.

We do not have any foreseeable plans for onsite processing of meat, milk or vegetables; however, we would like to leave the option open to future generations and our neighbors as the population and the need for a local food resource grows. We would also like to have the opportunity for any future on-farm sales and the ability to sell direct to the local visitors center for guests who will be able to enjoy a literal taste of Point Reyes.

We agree there is a need for buffer zones and are more than happy to offer our knowledge and experience in defining these lines. We understand the importance of protecting our natural and historical resources. Everything starts with the land and the soil. We feel it is our responsibility to take care of the land which takes care of us. In order to prevent additional impact to the land and the soil, we request species (plants and animals) to be maintained outside of the buffer zone so that they do not encroach on agricultural zoned land. We also worry about overgrown brush and grasses creating a potential fire hazard especially after the recent deadly California wild fires which devastated whole communities and farms. We know from first-hand experience the response time from our local emergency services takes 20 - 45 minutes.

We would like the opportunity to work hand in hand with the NPS on implementing the conservation framework including the decision on the various LMUs. Our family has been working this land for multiple generations and can offer knowledgeable input. We know what the changing seasons bring and how it affects every inch of the farm. We believe the conservation framework and LMUs shouldnt be a blanket decision and should be carefully planned out with each and every lease/permit holder. We recommend the LMUs also be flexible in order to adapt to changes in the environment and the local needs of the economy as well as take in consideration the historical and traditional uses of the land. We and our neighbors have been working constantly on improving our operation which includes the land and soil. There has been stagnation recently in improvements due to the current and past GMP process.

We applaud the NPS to implement strategies to maintain historic buildings with the opportunity to diversify their usage. We would love to be involved with the planning & construction process. We would like the opportunity to rebuild buildings which have been previously taken down due to detrimental damage or discontinued use. Because the Point Reyes weather is unforgiving, it would be helpful to be able to hold equipment or provide better housing for employees. Each farm or ranch contains a small community of families. The local economy and school system is very dependent on the families which reside in the seashore. It is necessary to have the ability to improve current residences as well as construct new buildings for employee and generational housing. It is also necessary to have the ability to erect new buildings to house equipment and vehicles in order to protect from the corrosive salty air and harsh weather conditions active on the peninsula.

We understand CDFW determined the elk herd population threshold of 100 elk with a maximum of 160 animals; however, we simply cannot continue to operate our farm with the impacts of the local elk herd. It is neither sustainable nor feasible to continue. We have been in a constant struggle since the arrival of the tule elk in the early 2000s.

We have had sizable impacts from the population from the very beginning when the population was minimal. This past year alone, we have had damaged fencing, fatally injured animals, severe loss of and damage to forage, and hay theft. These issues are and have been ongoing. We estimate our feed supplements have grown by 20% at least since the arrival of the tule elk.

We appreciate NPS in their current attempts to mitigate impact to our farm; however, we believe the attempts are failing. We believe the elk population referred to as the Drake Beach free-range tule elk herd is at this point now domesticated. The herd follows our feed truck to eat the hay we spread evenly on the field meant for our cattle. When the herd is hazed, they are chased through multiple fences to only return later in the evening for their nightly feast. Hazing is not only contradictory to NPS wildlife standards; it also scares our animals and causes damage to fencing and the fields. We are unable to properly rotate and rest our fields because the elk herd does not have boundaries. Not only does the unrest of the pasture cause a negative impact to the land, it is also costly. Since the arrival of the elk, we have witnessed the quality of our pasture decline and have had to supplement more outsourced feed. We have seen more erosion, obnoxious weeds, and poor re-growth of native grasses where the tule elk graze. In order to prevent further domestication of this wild animal and to prevent damaging impacts to surrounding agricultural areas, we recommend separating the elk from the agricultural properties with either elk fencing or relocation to the wilderness areas of the seashore.

We are disappointed in the recent published RDMs of our pasture lands. The recent measurements do not include the pasture which has been the most affected by elk grazing. The difference between the published RDM and the pasture where we have concerns is over 1,900 lbs per acre.

We would love to participate in educational tours and lend our knowledge to improve the visitor experience. We would also enjoy the opportunity to partnership with local schools and organizations on education. We are willing to participate in agricultural, bioscience, and conservational research. We also have lots of fun historical stories we would love to share.

We recommend better parking options and road conditions for park visitors. Although we welcome visitors to our farm, there are not many options for convenient and safe parking. We also recommend installing call boxes or the improvement to cell phone reception to the entire seashore and surround areas. With the growing number of visitors per year, we have a lot of stranded visitors knocking on the door for help.

Our main goal as a family is to provide security to the future generation as well as care for our animals and the ecosystem in which they reside. We have an obligation to our community to provide a sustainable and nutritious product while maintaining and improving the rural landscape and visitor experience. Our minds and hearts are open to discussing how we can simply make it work in this ever changing world.

Thank you again for the opportunity,

The Spaletta Family

Ernie and Nichola Spaletta Ernie Spaletta Jr. Rebecca Ahlers

#1313

Name: Baron, Monique

Correspondence: National Parks are first and foremost about conservation which by definition is the action of conserving something, in particular, preservation, protection, or restoration of the natural environment, natural ecosystems, vegetation, and wildlife. Point Reyes National Seashore is a national park-not a ranch. It is time to phase out ranching and fully restore and protect the unique coastal eco-system of the Point Reyes Peninsula. I am opposed to any kind of diversification, be it other livestock or row crops. Diversification will inevitably increase conflict between ranchers and wildlife within the park. Whether it is the deliberate reduction of predator species (including coyotes, bobcats, birds of prey) because they prey on livestock. Or the unintentional secondary

poisoning of predator species through the use of rodent control methods, such as arsenic which is permitted even under organic farming regulations, to prevent gophers and rats from damaging row crops. Let's re-wild PRNS!

With care,

Monique V. Baron

#1314

Name: Averill, Catherine

Correspondence: As a long time hiker in both Point Reyes and Mt Tam, and as a member of a volunteer maintenance trail crew, I am quite dismayed to hear about this push by the MCBC. This is a Pandora's box: using roads and trails that are near or adjacent to hiking trails, spells trouble, as I have witnessed many cyclists going off designated bike trails and frequently using non-bike trails. It's become practically epidemic, the misuse of trails by bicyclists.

As a road cyclist, I am utterly, emphatically opposed to what they are proposing. The trails in the greater bay area are already greatly impacted and damaged by myriad users, but particularly that of cyclists on hiking trails where they are not even permitted to ride. It's deeply troubling that MCBC's idea could even be considered given all the stressors that the parks and indeed the planet are already experiencing, plus the never ending financial strains of all the parks: lack of funding under the current administration, cutbacks and costs of upkeep and maintenance, to name just a few. It is my conviction that the state and national parks have an explicit, absolute responsibility to protect the natural beauty, aesthetics and peace of the parks, which includes fostering the care of the trails, protection of the animals who reside there, the native plants, etc., and insuring that the trails are a place of refuge for all. Allowing more intrusion into the parks by fast, mechanical devices that bicycles are is antithetical to this.

Cyclists have caused untold damage, and when I've encountered them on hiking-only trails, many have been very aggressive and threatened violence. It seems that many cyclists think they have the RIGHT to ride wherever they want. They do NOT. I wish the parks would make a much bigger effort to confront and fine those who are breaking park laws, and increase the fines for each infraction.

Please, do not pass this proposal. It's misguided and it would injurious to the well being of the parks, the trails, and all that the parks stand for.

Thank you for your attention to this matter. - Catherine M Averill

#1315

Name: Lott, Andy

Correspondence: I am in favor of more bike access. I support MCBC's access requests. Having ridden the trails currently open to bikes, there is still more access which can be provided while still safely accommodating other users - hikers and equestrians. Thank you.

#1316

Name: Whitmarsh, Avery

Correspondence: Thanks for opening up the opportunity to comment. I am a mountain biker, hiker, horseback rider, and dog owner who lives in Marin and I would like to see more trails open to mountain biking. It seems like there is a large community of people against this, despite the fact that is such a large community of people who are for the most part the same as all the hikers, equestrians, etc.

Here are the access improvements we are interested in seeing developed:

A new trail between Devils Gulch and Platform Bridge through the Cheda, McIsaac, and Zanardi Ranches.

A plan to connect the Cross Marin Trail into Point Reyes.

Adoption of social trails off Bolinas Ridge for better connectivity and a single-track trail experience.

Extend the Olema Valley Trail to Bolinas on the east side of Highway 1.

Close gaps for bikes through ranch lands in the park, including closing the Estero Trail loop, connecting Sir Francis Drake Blvd. with Pierce Point Road, and connecting Marshall Beach to Pierce Point Road,

A more bike-friendly permit application process for road and mountain bike events in the park, including along Bolinas Ridge and out to the lighthouse.

Bike access to all ranch roads in the pastoral zone that are already open to pedestrians.

Thanks for your time, Avery

#1317

Name: Walter, Martin

Correspondence: We are always looking for new areas where we can ride our mountain bikes. Wherever we go, we always try to be respectful of the wildlife, other trail users, especially with equestrians and always try leave the trails cleaner than we find them. Point Reyes is a spectacular area that we have visited many times for hiking and also camping. It would be so great to be able to also explore the area on mountain bikes.

#1318

Name: Barbieri, Jessica

Correspondence: Hi. I frequent the Point Reyes National Seashore regularly to photograph the wildlife. The tule elk are a treasure. I am always in awe of them, their beauty, and what a delight it is to encounter them and observe them in their habitat. I urge you to do no harm to them. Culling and murdering them is not reasonable. The ranchers are guests on national park land. And already receive generous financial assistance. They do not have the right to make further unreasonable demands. I trust that you are wise and can find another solution. One that is cruelty free. And that honors and preserves the elk. Thank you.

#1319

Name: Isadore, Megan

Correspondence: November 30, 2018

Cicely Muldoon, Superintendent Point Reyes National Seashore 1 Bear Valley Road Point Reyes, CA 94956

RE: 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

Dear Superintendent Muldoon,

Thank you for the opportunity to submit comments on the Point Reyes National Seashore General Management Plan Amendment (GMPA).

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 seven 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 the 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.

As a general comment, we recognize that NPS intends to continue to authorize beef ranching and dairies at PRNS. The GMPA should make clear that the intention to continue those authorizations is entirely separate from NPS' mandate to preserve the historic and cultural resources of PRNS. In the Bay Area alone, there are any number of 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. The GMPA should include relevant examples of repurposing park resources while preserving their historical and cultural value.

Our specific comments concern four general topics, as outlined below.

1. Wildlife, Habitat, and Other Natural Resource Protection

Consistent with NPS management policies, the primary goal of the GMPA should be to "preserve and protect the natural resources, processes, systems, and values... [of PRNS]...in an unimpaired condition to perpetuate their inherent integrity..." Toward that goal, the GMPA should establish management guidelines for protecting wildlife, habitat, and ecosystem function. Degraded resources should be restored, and further impairment of resources should be avoided.

In creating these management policies, NPS should ensure that authorized uses within the park, such as beef ranching and dairies, only be continued in a manner and to the extent that they do not constitute impairment of park resources. No agricultural uses beyond beef ranching and dairies, including so-called "diversification" into row crops or livestock other than cattle, should be allowed.

Tule elk herds in the planning area should not be managed for the benefit of agricultural lease holders. Any perceived conflicts between the elk and agricultural operations are of a purely economic nature, and should be treated as such by the GMPA. Damage to fences, interference with agricultural operations, and competition for forage are all fundamentally economic issues that can be addressed through the structure and terms of leases and permits. Under no circumstances should the elk be culled or relocated because of these perceived conflicts.

In contrast, incursion of cattle into areas outside the pastoral lands should not be tolerated. On a number of occasions in recent years we have observed and documented cattle trampling sensitive areas in and around Abbotts Lagoon. While we did not advocate for reducing the size of livestock herds through culling or other means, we did in each instance request that PRNS management address the situation, and in due course without any urgency the cattle were removed from the sensitive areas. This contrast illustrates a fundamental defect in

managing park resources: too much deference is given to the interests of the ranch and dairy operators. The GMPA must address and correct this defect.

Production of silage is another issue that affects wildlife. Current levels and methods of silage production should be evaluated and adjusted in order to avoid impacts to nesting birds and other wildlife. Where silage production is allowed, no-till methods should be required, and mowing schedules should be strictly regulated.

The GMPA should include development and implementation of Integrated Pest Management plans. Use of pesticides, including rodenticides, with the potential to harm wildlife should not be allowed.

The GMPA should prioritize habitat restoration. Over time, ranching and dairy operations have resulted in degraded and impaired habitats. The GMPA should proactively identify these habitats and describe strategies for restoring them. Information about habitat restoration needs and progress should be readily available to the public.

2. Water Quality

Water quality in the planning area is regulated under the Clean Water Act by NPS and the San Francisco Bay Regional Water Quality Control Board (RWQCB). Some ranch and dairy operations are part of an RWQCB conditional waiver program, and some are regulated directly by NPS. In both cases, evidence of compliance with the relevant legal mandates should be readily available to the public.

3. Conservation Framework

The use of the term “conservation framework” as on page 9 of the GMPA Newsletter is misleading. The framework, as described, is an effort to shoehorn some resource protection measures into an overall management strategy that prioritizes the interests of ranch and dairy operators. The framework should consider what operational limitations are necessary for the ranches and dairies to serve and be subordinate to the overall resource protection goals of PRNS.

4. Climate Change

The effects of climate change on the planning area are reasonably foreseeable and should be accounted for in developing resource management strategies. Species abundance and distribution will likely change, and sensitive habitat areas will shift. The shoreline will move landward due to sea level rise. Ranch and dairy operations may become unviable due to changes in temperature and rainfall. Wilderness areas such as Abbotts Lagoon and Drakes Estero may expand into the pastoral zone. The GMPA should develop strategies now for dealing with these futures changes.

Thank you for the opportunity to comment on the preparation of an 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

#1320

Name: Suter, Judy

Correspondence: November 30, 2018

Dear Superintendents of Pt. Reyes National Seashore,

I have been camping at Stewart's Horse Camp and have been a Park user for 35 years and I strongly oppose allowing mountain bikes on trails at Pt. Reyes National Seashore. This NP is a gem and deserves to be protected. The job of government is to protect the public and to protect the natural resources of our parks while allowing monitored recreation. Mountain Bikers are a danger to the users as well as the natural resources of Pt. Reyes National Seashore.

Over the years there have been several accidents in the Park involving equestrians and illegal bike riders. Horses have been injured and equestrians have been life-flighted out of the Parl. This is evidence enough that the two disciplines do not belong on the same trails.

Local, State, County, and even Federal rules disallow incompatible activities in our parks, waterways, cities, and roads. For example, motorboats in swimming areas, bicycles and skateboards on sidewalks, pedestrians on freeways. This is common sense in order to protect the public. The job of government is to keep the public safe.

Pt. Reyes is a National Park and Wilderness. Per the Wilderness designation, bikes are not allowed. The Park does not have money in the budget or enough rangers to monitor usage on the trails. It would be inappropriate to change the use in the Park over which essentially the Park would have no control.

Mountain Bikers already ride the trails at Pt. Reyes illegally and dangerously. They post their downhill times on STRAVA competing for the fastest time. Just go to the STRAVA website to see how fast they go. They are already putting other park users at risk. They don't care about nature, only the thrill of the ride.

The trails at Pt. Reyes are often very wet due to the fog and bike tires cause ruts that lead to erosion and deep gullies in the trails. Bikers also use the edges of the trail to bank their turns. Hikers and horses cannot walk in these ruts, gullies, and banked turns. There are State Parks along the coast in California and Oregon that do not allow bikes for these reasons.

Another danger in the Park is the steepness of the trails and the nettles. A biker traveling at high speed can easily run into a hiker, birder, or a horse. When spooked, the horse will buck the rider off and gallop down hill as fast as possible to escape the "predator". The horse can easily break a leg whereby the horse must be euthanized. The rider could also easily have a broken back or other injuries. If a horse is spooked and jumps into the nettles, it will go into shock and die.

Please protect our resources. Please keep all park users safe. Never allow bikes on the trails at Pt. Reyes National Seashore.

Respectfully,

Judy Suter

#1321

Name: Shaw, Margot

Correspondence: We have similar problems here in Canada with the ignorance of the politicians wanting to kill and cull wild animals. Why can't intelligence and common sense prevail. There is enough room on this earth for all wild animals. Mother Nature will take care of herself. Mankind does nothing but SCREW THINGS UP!!! Stop the nonsense and LEAVE THE WILD ANIMALS ALONE!!! For God's sake mankind is making too many animals extinct or endangered. We need to keep out of this and let nature take it's course. Mankind, as I've said before, ONLY SCREWS THINGS UP!!! STOP KILLING WILD ANIMALS!!!!

#1322

Name: Morse, M

Correspondence: Dear National Park Service,

I support the following initiatives which would expand and create access for road and mountain bike use within Pt. Reyes National Seashore:

A new trail between Devil's Gulch and Platform Bridge through the Cheda, McIsaac, and Zanardi Ranches.

A plan to connect the Cross Marin Trail into Point Reyes.

Adoption of social trails off Bolinas Ridge for better connectivity and a single-track trail experience.

Extend the Olema Valley Trail to Bolinas on the east side of Highway 1.

Close gaps for bikes through ranch lands in the park, including closing the Estero Trail loop, connecting Sir Francis Drake Blvd. with Pierce Point Road, and connecting Marshall Beach to Pierce Point Road,

A more bike-friendly permit application process for road and mountain bike events in the park, including along Bolinas Ridge and out to the lighthouse.

Bike access to all ranch roads in the pastoral zone that are already open to pedestrians.

thank you,

The Morse Family

#1323

Name: Lefkovits, Stephen

Correspondence: Through this process, the Park Service is asked to help weigh the benefits to 30 agricultural corporations versus the long-term benefits of wildlife and public open spaces to the 3-4 million annual visitors to Point Reyes National Seashore.

I write to strongly oppose any measures or outcomes that will lead to the removal or killing of tule elk. Killing the world-renown symbol of Point Reyes for the grazing convenience of fewer than 30 businesses is ludicrous and a violation of the public trust. Put simply, the benefits of wildlife viewing, education and preservation to the millions of visitors to the park clearly outweigh the economic interests of businesses that voluntarily choose to site themselves in a national park.

Further, there is no inherent conflict between the presence of the elk and the farms, except the desire for incremental convenience and profit. Point Reyes is a unique place with a set of historical and legal conditions that

make every user aware that they are enjoying the benefits of profound compromise that allow a wild place, wildlife, farming, ranching and recreation to exist within an hour's drive of one of the largest market and population centers in the United States. I urge the NPS to take no action that will upset the current stasis in favor narrow commercial interests that could have an irreparable harm to existing beneficial users (wildlife) that can't speak, and the millions of visitors who don't know about this process but would speak if they could.

Would NOAA kill humpback whales in Monterey Bay? Would the park service plan to kill black bears wholesale in Yosemite? Why not just chop down the spiny cactus in Saguaro National Park or make room for cattle grazing in Yellowstone? Killing the symbol of Point Reyes for the convenience of commercial interests is reprehensible.

#1324

Name: Gedeon, Andrew

Correspondence: Its time to share the trails, the elitist equestrians rule of the of the trails needs to end so those of us tax paying cyclists can enjoy great cardio exercise in the point reyes park

#1325

Name: LaSasso, Victoria

Correspondence: I first became aware of Point Reyes National Seashore in 2016, when my partner brought me out to Point Reyes to explore the beauty of that undeveloped coastline. I grew up in the Midwest. This, I had always thought, was quintessential California. I was fortunate enough to be able to move out to Marin County with my partner, and we celebrate almost every holiday at Point Reyes. Routinely we head to Limontaur Beach to recreate. Drakes Beach is another one of our favorite locations. It is absolutely incredible to see the elk roaming the landscape. It is truly an island in time. I don't know of many other National Parks where visitors can have such intimate experiences with wildlife.

Unfortunately, there are some not so pleasant experiences to be had, too. I was surprised to see so many alternatives discuss the maintenance and/or expansion of the farms at the national seashore. Clearly, there are many negative impacts to natural resources and the public enjoyment of our land, so why explore the expansion? We used to head to Chimney Rock and Pierce Point Ranch, but the roads have become too damaging to our vehicle and we try to avoid the unnecessary wear and tear caused by the massive milk and feed trucks. These ranches seem to cause significant impacts on the landscape. Particularly the ranches at either end of the Seashore A, B, I, L, etc. I assume these have detrimental impacts to wildlife and the waterways. The ponds around the ranches are much more colorful than the barren grasslands, and I imagine it is due to run-off. Is this why there are signs in Tomales Bay that say not to swim? Shouldn't these places be downsized for public safety? These impacts are just the tip of the iceberg I suspect. Methane emissions, water consumption, and disease are additional considerations to warrant a decrease of commercial operations.

My partner and I pride ourselves on living more sustainably, and we hope this process will provide the public with a path for a more resilient seashore; one that is carbon negative and supports the utmost protection of wildlife and waterways. I've driven up the coast numerous times now and I see ranches most everywhere, but rarely do I find such robust wildlife and plant communities as Point Reyes National Seashore along the California coast, much less the contiguous 48 states.

Additionally, the improvement of public access would be appreciated. Why are there only campsites in the Wilderness area, so far away from some of the most scenic and iconic areas on the Seashore? There are opportunities to repurpose historic buildings in Point Reyes for public use and enjoyment, not just private business. Car camping, new hike in camping locations, an additional centrally located hostel, and/or the conversion of ranches to scientific/educational research stations could help to decrease impairment of natural resources while enhancing public use and enjoyment and increased interaction with the cultural resources in the historic district.

Please improve recreational opportunities and protect the water and wildlife in Point Reyes.

#1326

Name: Rankn, Darlene

Correspondence: I've been going to point Reyes with my horse 2 to 6 times a year, for the past 13 years Camping in Stewart's. At a cost of about 500\$ per visit that's including gas and food. I do this because it is a well traveled, and safe area for me to bring my horse and friends. With the multitude of trails open for horse and hiker only. I'm am not worried about the careless rider skidding around some blind corner spooking my friends horses. Mine is trained well enough that this does not bother him. On a whole horses have far less access then hikers and bikers, it would be a shame to remove this from my list of yearly camping trips. On a final note I believe the revenue brought in from the horse community well exceeds that of then day hikers and bikers combined. We pay a daily fee to provide the care and maintenance of the camp ground, unlike the many day use hiker and bicyclist that cause as much wear and tear on the trails as the rider. The horses help keep the trails compacted and clear of weeds that are so much more over grown since the irradiation of the fallow deer. The horse causes way less disturbance on the wildlife, as they are less likely to fear a rider then a bicycle. I've watched a whole family of bob cate play from the back of my horse. Coyotes just sit and watch me ride by without bothering to get up. I have 2 trips planned again this year and would not hesitate to pay a modest increase in fees to help maintain this special place.

#1327

Name: N/A, N/A

Correspondence: First of all, I really appreciate that the GMP amendment and EIS is looking at incorporating visitor access interests and impacts as well as soliciting comments from the public. Point Reyes National Seashore and the GGNRA lands are an incredible treasure that must be preserved and managed sustainably for future generations to enjoy. I would hope that would also include increased bike access in the GGNRA and Point Reyes NP.

Marin County is abundantly blessed with so many areas protected by GGNRA and the Point Reyes NP yet it also is one of the most restrictive counties as far as trail access for bikes. MCBC and Access4Bikes are mountain biking organizations that do have some common interests with the Park Service and GGNRA; they are also interested in preserving the beauty of the surrounding lands, they can provide valuable input for hardened, erosion-resistant trails and even volunteer work force days in establishing and maintaining trails (under the supervision of the NP Service and the GGNRA). I have been hiking Point Reyes NP, GGNRA and MMWD lands for 35 years and have never really had an unpleasant trail experience with bikes and only a few with inexperienced equestrians. I believe there is room for all and we should acknowledge the changing dynamics of the user groups. I appreciate seeing healthy bike use outdoors and am fully aware that bikes can cover more ground in a day than hikers so I believe that opening up connective routes and loop possibilities between existing areas is appropriate and necessary. Agree with proposals to connect the Cross Marin Trail to Point Reyes NP, develop a trail from Devils Gulch to Platform Bridge through leased ranches, in addition would like to see bike access for the Bear Valley Trail opened up the rest of the way to the Coast Trail and the Coast Trail opened up all the way to the Limantour Beach Parking Lot. The trail from Pierce Point Ranch to Tomales Point would also be a good candidate for bike access.

#1328

Name: Wagner, D

Correspondence: I have and hope to continue to enjoy the Pt Reyes NP.

I also love riding my bicycle. However I have concerns about intense use of the park by bicycles or more obvious to me as I hike, the horses, and the way they tear up terrain and leave piles of excrement unnatural to the environment. I would like to see areas for cycling increased. But carefully, perhaps as a means of access to the park reducing vehicular traffic. Or by extending or widening pathways.

Also the plan b propounded the park is a step forward without dramatic changes that could decrease the quality of the park as many federal parks are being "loved to death".

There is also the concept of continuing to provide food locally to large metropolitan areas continues to be infringed upon by competing desires of recreation and development. Should the park eventually return to a more natural state that continues to be possible. In an era of climate change with larger storms and greater swings of drought it seems sensible to maintain agriculture in a carefully managed way to promote wildlife in part while not increasing risks of greater fires in large wild areas.

Thank you for this work. Do your best for pt Reyes. And compromise n negotiate the rest

#1329

Name: Shreeve , Jamie

Correspondence: I am advocating to ask for more bike access in the Point Reyes area. I am supporting and agree with MCBC and A4BF request for these bike friendly trail access and items:

A new trail between Devil's Gulch and Platform Bridge through the Cheda, McIsaac, and Zanardi Ranches.

A plan to connect the Cross Marin Trail into Point Reyes.

Adoption of social trails off Bolinas Ridge for better connectivity and a single-track trail experience.

An extension of the Olema Valley Trail to Bolinas on the east side of Highway 1.

Gap closures for bikes through ranch lands in the park, including closing the Estero Trail loop, connecting Sir Francis Drake Blvd with Pierce Point Road, and connecting Marshall Beach to Pierce Point Road.

A more bike-friendly permit application process for road and mountain bike events in the park, including along Bolinas Ridge and out to the lighthouse.

Bike access to all ranch roads in the pastoral zone that are already open to pedestrians.

Thank you for your time!

#1330

Name: Hope , George

Correspondence: I fully support the proposed routes as mapped, and any additional cycling access. Through routes, loops, and social trails. ASAP

#1331

Name: N/A, N/A

Correspondence: Hello. I urge you to not allow mountain biking in Pt. Reyes. Lived decades in SF, hiked and still hike Pt. Reyes - a national treasure. Environmental degradation will result, often bikes don't stay on trail, safety issues, you have to keep looking over your shoulder and people have gotten hurt. I and thousands of hikers go to Pt. Reyes to find peace and solace in this increasingly stressed and stressful world. My plea and two cents. Thank you.

#1332

Name: Flett, Mary Anne

Correspondence: I have been visiting Point Reyes National Seashore and the Golden Gate Recreation Area for more than 40 years and I have lived in Point Reyes Station for 22 years. I hike or kayak in the Parks most days of the week. I rode my horse on trails throughout Point Reyes National Seashore for 16 years.

I just reviewed the "Elements Common to all Action Alternatives" in the Visitor Carrying Capacity Analysis, which proposes the option of opening new bike trails and bike access to ranch roads. I am very opposed to, and concerned about, expanding access to regular mountain bikes and the possibility of E-bikes on Park trails. I am writing to strongly object to allowing increased bike access of any type in the National Parks.

Bikes cause immediate and cumulative environmental degradation including impacts to vegetation, wildlife, and wildlife habitat. Bikes adversely alter the experience of hikers and other park visitors who are out to quietly enjoy the peace and feel of being in nature. They negatively impact hikers by startling them when they ride up unexpectedly from behind or come around a blind corner. Bikes are also a safety issue, potentially causing injury to hikers and horseback riders, particularly on downhill sections of trails where they often travel at speeds that are too fast to allow them to stop or avoid colliding with people on foot or horseback. In the East Bay Regional Parks, I have called 911 twice to help bikers who have flipped frontwards off of their bikes and seriously injured themselves because they were traveling at speeds that made it impossible for them to stop or avoid rocks or other obstacles in the trail in a controlled way. How much time does the Park have and how well would the Park be able to monitor bicyclists' behavior and enforce speeds and safety on the trails if bikes were allowed on them?

I strongly urge the National Park to not to allow more bike access than there already is in the Point Reyes National Seashore or Golden Gate Recreation Area.

Thank you for considering my point of view.

Mary Anne Flett

#1333

Name: Allison, Mickey

Correspondence: November 30, 2018

Cicely Muldoon, Superintendent Point Reyes National Seashore 1 Bear Valley Road Point Reyes Station, CA 94956

Re: Point Reyes National Seashore General Management Plan Amendment, Environmental Impact Statement Scoping Comments

Dear Ms. MacLeod:

I am grateful for this opportunity to comment on alternatives for the Point Reyes Seashore GMP Environmental Impact Statement, and for the opportunity to ask questions of the NPS staff at the Bay Model earlier this month. I found them helpful, knowledgeable and forthcoming when I asked specific questions, often guiding me to the individual who would be better able to answer my question in more detail. I would appreciate it if you would thank them for me.

I am not anti-farm or anti-ranching. Various members of my extended family, my parents and my immediate family have been caretakers of ranches/farms ranging from a thousand plus acres to my own immediate family's more modest 17 acres with a few cows, horses and a growing 4-H sheep project that needed culling during a 3-year drought. Spending time on these farms in the California foothills, Pennsylvania and Maryland, I learned through a variety of experiences that care of the land is critical to making a profit, that over grazing can create an

economic disaster the next year, that rain patterns fluctuate and may lead to drought forcing the need to cull the herd/flock if your pastures and finances are to survive long term. This is true for any farmers/ranchers who own their land, but it may be ignored by lessees who do not have the same financial stake in the buildings, fences and the land they farm/ranch. Today, it is not uncommon to see leased farms rundown with trampled and overgrazed pastures. It seems like history is repeating itself and the National Park Service serves as Landlord for

After re-reading *Ranching History at Point Reyes* I noted the following interesting points which I've put in bold and/or underlined: See: https://www.nps.gov/pore/learn/historyculture/people_ranching.htm

Shafer brothers & Howard made tenant farming the norm and variety of farm products:

- "C. W. Howard, and the Shafter brothers proceeded to divide the remainder of their real estate into a tenant dairy enterprise in 1866. The land was subdivided into 33 ranches. Three years later, the business partners partitioned the dairies into six tracts, leaving each to own and manage a collection of coastal plain and ridgeline ranches." - *Creation of an Empire*, paragraph 3 • "[throughout the] late 19th century. Herds of Devons, Jerseys, Guernseys and later Holsteins, numbering from 100 to 250 cows per ranch..." "Marin County produced 932,429 pounds of butter, the largest yield of butter in California." - *The "Butter Rancho*, paragraph 2 • "The accumulation of massive debt, the 1929 stock market crash, and the close of the Depression ultimately brought an end to the three estates, and the "butter rancho". Land speculators picked up the pieces, and in most instances resold the ranches to the contemporary tenants." - *The "Butter Rancho"*, paragraph 5 • The Shafter / Howard enterprise "corresponded to the feudal system of England", according to the *San Rafael Independent* in 1939. The new owners had chafed at the terms of their leases and the increasing inability of their landlords to make capital improvements to their dairy infrastructure. - *Transitional Years*, paragraph 1 • "During the Depression, ranchers struggled to make ends meet. It was not uncommon for ranchers to augment their incomes with expanded livestock production, such as beef cattle, chickens, and eggs. Several ranches invited Japanese immigrants to raise peas, and Italian immigrants to cultivate artichokes on more remote parcels. These ventures were usually successful." - *Transitional Years*, paragraph 2 but result of these ventures was soil erosion • During World War II, the ranches became connected to the regional electric power grid, replacing gas-powered generators to run milking and refrigeration equipment. The cooperative creameries closed, allowing for ranchers to sell raw milk as commodity to regional creameries. After the war, some dairies ceased operation, converting to far less labor-intensive beef cattle operations. - *Transitional Years*, paragraph 2 • [1950s- 1960s] ... "the influx of new residents, many of them affluent, property taxes for the county as a whole dramatically increased. At the same time, dairy operators nationally saw prices for the products drop considerably. Dairies regionally had been closing or consolidating for sometime, but the combination of economics, competition, labor costs, taxes, environmental regulation, and land values accelerated the pace."

Controlled management by Native Americans, and subsequent problems created by traditional farming:

- "Unknown to the early ranchers, the expansive coastal prairie was most likely the byproduct of burning, weeding, pruning and harvesting for at least two millennia by Coast Miwok and their antecedents." - *The Alchemy of Grass Turned to Gold*, paragraph 2 • "The demand for Shafter / Howard ranch produce waned, particularly as transportation throughout the Bay Area improved. Other regional dairies were improving their quality, quantity and distribution of produce, while the cumulative impacts of overgrazing on Point Reyes had caused a significant decline in pasture quality. - *Creation of an Empire*, paragraph 4 • "Following the 1906 earthquake, several dairies located on Inverness Ridge shuttered their doors. Although building damage contributed to their demise, these ranches failed due to the absence of Coast Miwok burning and the rapid expansion of native coyotebrush and poison oak thickets, leading to dramatic reductions in grazeable pastures for cows." - *The 'Butter Rancho'*, paragraph 4 • Following the attack on Pearl Harbor in 1941, and the subsequent internment of the Japanese-Americans and relocation of Italian-Americans, the fields went fallow for lack of labor, and mounting soil erosion problems." – *Transitional Years*, paragraph 2

Concerns:

1) With the possible exception of the McClure dairy farm/ranch, the current status of the rest of the ranches in Point Reyes National Seashore seems to be similar to the historical tenant ranchers who apparently struggle for survival with the National Park Service acting as the landowner representing the people of the United States. o With 10 year leases with lower than market value rate the ranches have serious ecological and infrastructure problems that have not been addressed and need to be addressed if 20 year leases are offered. o Under current conditions it is not clear who is responsible for improving infrastructure and leased lands. o If the rancher/farmer is responsible are grants available? If it's a combination of rancher and NPS, is there a working relationship already in place or envisioned by Congressman Huffman? o If 20 year leases are granted, ranchers need to opt into becoming model farms that will, within 5 years time, showcase to the world how California can do ranching better. If a rancher is not willing to do so, then the lease should be terminated.

2) The EIS must be based on thorough, scientific studies of the environmental effects of cattle ranching and any other proposed agricultural practices on the natural environment of Pt. Reyes. These should include, but not limited to water quality, air quality, native vegetation, soil processes, wildlife, and endangered species. o Reconsider allowing the spread of manure as residual dry matter or in the form of slurry sprayed on fields unless water and soil testing shows that there is no contamination of surface waters. . o This would require regular, wet and dry season water testing of streams, ponds, estuaries leading to the bays and ocean to be sure that nitrates, phosphates and pathogens found in animal urine and feces are not putting aquatic and terrestrial wildlife and their habitats at risk. o Soil testing to assure that hillside manure storage on hillsides, pond storage, spread of dry manure, or slurry sprayed on fields is not in excess of maximum permitted levels. o Publish the results of water and soil testing so that the public can be aware of potential pathogens and nutrients that might affect their safety or that the soil and surface waters are free of contamination. o If manure spreading or slurry spraying is deemed to be within safe limits, consider that it should not take place in any location where Tule Elk are found to avoid spreading disease. o Convert Current practices of Manure Storage by encouraging ranchers to cooperatively invest in one of the practices sharing specialized equipment where possible: • Dairy Waste Transformed into High Quality Compost” <http://blog.midwestbiosystems.com/blog/bid/248273/Manure-vs-Compost-Dairy-Waste-Transformed-into-High-Quality-Compost> • Partially convert manure with anaerobic digester to energy in the form of bio-methane similar to what Strauss Dairy uses. <http://straussfamilycreamery.com/values-in-action/methane-digester> and <https://www.adisystemsinc.com/en/case-studies/adi-systems-solves-strauss-dairys-wastewater-dilemma>

3) Best Management Practices need to be clearly stated to avoid harm to natural resources. o Site visits, including photographs should be taken if signs of overgrazing, severe trampling, erosion, topsoil loss, or water runoff are observed. o Range condition should be reviewed frequently so as to detect and reverse trends indicate need for mitigation. o Grazing should be rotated as often as necessary to allow rest and restoration of leased lands. This might require smaller paddocks or grazing areas so that rotation can occur. o The goal should be to create model ranching operations that would showcase Best Management Practices to visitors from all over the United States as well as abroad.

4) If dairy and cattle ranches had herds “numbering from 100 to 250 cows per ranch, catapulted the Point Reyes enterprise as perhaps the largest operation in the early years of the state”, and there were problems with overgrazing how does that compare to current numbers of dairy and beef cattle? See: Ranching History of Point Reyes. o “Current authorizations allow approximately 6,000 cattle on a year round basis.” See: Point Reyes National Seashore General Management Plan Amendment Newsletter, page 8. o A Census of cattle (dairy and beef) should be taken for each ranch to determine how the number of cattle has changed from what was the herd size historically, in the original farm lease and what is allowed in the most recent lease. o Independent, scientific experts should determine the carrying capacity individual ranches, based on current condition of grazing lands and the prospect of climate change, Maximum carrying capacity for both the pastoral zone and individual ranches should be based on scientific research, not current or past precedents. o The number of cattle (dairy or beef) should be based on the goal of not only avoiding future impairment, but allowing land to recover, restoring, and then sustaining the resource values of the pastoral zone. o Cooperative farming has historic precedents. Consider options such raising the dairy bull calves as Special Fed Veal, Baby Beef in group housing or even as steers to market weight and sell to local markets which could provide additional income to ranchers

5) Diversification needs to be carefully defined to the public as well as be very clear to ranchers: o Diversification on leased grazing lands: Agricultural operations should not be expanded or diversified, converting ranching and dairying rangeland to vineyards; to grow artichokes or any other produce, has been historically known to lead to erosion o Commercial livestock such as sheep, goats, pigs, turkeys and chickens might entice predation o Diversification within the ranch core is acceptable, with limits, for a vegetable garden and a few additional livestock for family and farm worker use.

6) I am in favor of maintaining the Tule Elk herds within the park. Better fencing, might help, but the solution is not to remove them, as it's my understanding that they were historically native to this area before ranchers arrived. If management is required I prefer birth control methods.

In conclusion, I am not opposed to 20 year leases, but if the ranchers cannot step up to becoming model farms, showing the world how California can do it better, than it is time to stop dairy farming and at maximum have only beef cattle in Point Reyes National Seashore.

Sincerely,

Mickey Allison

#1334

Name: RICHARDS, CATHY

Correspondence: To Whom It May Concern:

I am re-submitting my letter of concern from Nov. 2017 of last year over the possible elimination of the historic ranches in the Point Reyes National Seashore as a concerned citizen and full time homeowner in the immediate area.

It does not seem to me that the changes to the ranching plan have been materially different from the previous year's plan which was recently presented. For example the minor change of possibly giving the ranchers "up to 20 years leases" rather than giving them 20 year leases doesn't seem much of a concession.....

Historic ranches in the park should stay on the seashore.

(5) Allow the continuation of farming and ranching in the Seashore and remove any herd of Tule elk threatening farming and ranching operations on the Point Reyes Peninsula.

One of the great attractions of our unique area in the Point Reyes National Seashore is the wonderful organic cheese, milk and pasture raised butter (dairy) and grass fed beef. No one wants to get their dairy or beef from feedlot cattle as on I-5 in Southern CA outside of LA. Having working ranches allows this area to have an important purpose in supplying a very important commodity of organic food production rather than turning it solely into a tourist destination as our only industry. Ranching families who have been here for 4-5 generations could be potentially driven out in spite of the fact that they have already contributed so much to our local community.

Over-utilization of our resources in this area by tourism alone as our sole industry will tax our valuable resources of water, sewage and garbage disposal even more. This is a problem that has already been identified by the Point Reyes Village Association. We do love our tourists, but as with all places that have "been discovered" we have to continue to put safe guards in place to insure our area's survival and the ranches are key to our community's health and survival by allowing business diversification.

Our ranching families are very involved in the community and are continually giving back to the community. They provide local jobs, and help our economy be local. Their children and the children of their workers go to our

schools, attend our community events, and fund raisers. They are also involved in various community service organizations. The ranchers live here full time and have a vested interest in keeping this area the very special community minded place that it is! They provide jobs for our local community and children in our schools. All 6 dairy ranches have all been certified USDA Organic one of the most stringent designations known to be enforced at this time.

This area has always had human habitation from before recorded history. The Miwok Native Americans harvested food from the local flora and fauna because it was an area of rich natural resources way before the ranches came into being in the late 1800's. It is a part of the human condition that as we live so must we find a way to produce food for ourselves in a sustainable way, which is what the organic dairy and grass fed cattle ranching industry is all about. These ranches are producing food that is actually good for us, not poisoning us! The ranching community has been involved in working with environmental groups and the park service in making their ranching operations compliant with these environmental concerns, as well.

In order to have a sustainable business the ranchers need to be able to have 20-year leases. Few if any banks will take a risk in funding capital improvements for 5 years or less at favorable terms. Just as people need a healthy sustainable food source, so too do the ranches need to have a sustainable business plan. The ranchers are currently limited as to what they can do with their leases in a very tough competitive market. They should be allowed to diversify just as an investor does. Putting all ones eggs in the proverbial one basket is a disastrous consequence for any investor if one market segment fails to perform s/he has others that perform well so s/he can overcome his/her losses. This is just a wise business practice that should not be denied to the ranchers.

Respectfully Submitted,

Cathy Richards

#1335

Name: Parris, Gaul

Correspondence: I go to Pt Reyes 3- 5 times a year mainly to see wildlife but have also always enjoyed mix of ranches and wildlife. Having grown up in a ranching community I know both can coexist and the fact both have coexisted in Pt Reyes for eons, I know it can continue without eradicating wildlife which is ridiculous in a National Park. Although I have always enjoyed the coexistence of both ranches and nature in Pt Reyes to eliminate and eradicate wildlife there which was established for all of us in favor of a few private people would be a travesty. I would hope you can find a way to meet both needs but for God's sake at least protect the natural part of a park that is for all of us, not just a few. I can see cows and ranches everywhere where I live in California. Pt Reyes is the Only place I can see elk and other wildlife up close.

#1336

Name: Chariton, Laura

Correspondence: November 28, 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,

Thank you for the opportunity to comment on the General Management Plan (GMP) for the Point Reyes National Seashore (PORE). I am the president of the Watershed Alliance of Marin 501c3 and I am commenting as an individual not a representative.

The preferred alternative is: No Ranching and Expansion of Tule Elk in the Planning Area- A no ranching alternative is required by the Agreement. Under this alternative, ranching in all areas of the Seashore and the north district of Golden Gate NRA would cease. With the exception of the two locations with life-estates, most operations would be phased out over a period of 5 years. The NPS anticipates many of the areas and their associated facilities would be converted and offered for public not-for-profit education, research and outdoor experiential activities and other public recreation and visitor opportunities. The EIS will evaluate these actions at the programmatic level. The NPS would take limited action to manage the geographic extent of the free-range tule elk herd, but only where management is needed to support other resource protection and park goals. Federal Register

The above alternative most closely represents the intent established according to the 2006 National Park Management Policies. The caveat in this preferred alternative is that the unstated park goals should be in sync with existing NPS policies.

There are concerns because most of the alternatives presented in the GMP amendment appear to have several intrinsic conflicts with the National Park Services 2006 foundational policies. One of those conflicts is that commercial grazing, dairying operations are a privilege with responsibilities. The inference of the other alternative plans provided is that it caters to continue commercial interests potentially adverse to wildlife recovery, habitat conservation and restoration and preservation of multiple rare and endangered species of flora and fauna. Having been a park visitor for over 45 years and more recently a volunteer deeply concerned at the proposals and trajectory at PORE and what I understood to be the legacy of PORE and the NPS.

NPS: Without the wild, iconic places that represent the past, present, and future of our nation, where would we be? The mission of the National Park Service 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. In the short term&. The National Park Service must manage its resources in a manner that conserves them for future generations. Parks with agricultural livestock use, including parks where such use is administered by another agency, must address this use in an appropriate planning document. Agricultural livestock grazing will use best management practices to protect park resources, with particular attention being given to protecting wetland and riparian areas, sensitive species and their habitats, water quality, and cultural resources. Managers must regulate livestock so that (1) ecosystem dynamics and the composition, condition, and distribution of native plants and animal communities are not significantly altered or otherwise threatened; and (2) cultural values are protected. A comprehensive monitoring program must be implemented, and adaptive management practices must be used to protect park resources. (Natural Resources: Grazing 8.6.8.2)

The document and Alternatives presented for consideration seem to promote continuation of habitat damaging commercial ranching operations. Current science had not yet informed us of the damage to ecosystem functions and services caused by traditional ranching and dairying. In reading the National Park Service Policies 2006, the groundwork for the no-ranching alternative has been laid. The alternative plans presented indicate an upside down stance favoring commercial interests over the public trust doctrine, the bedrock of the NPS.

These are some of the conflicts between NPS tenets and alternatives with the exception of the no-ranching alternative. Has there been effective monitoring that would lead to adaptive management practices? Where are the examples?

The latest count of PORE Tule elk number 660 - 403 Tomales Pt., 112 Drakes, 145 Limantour. An assumed total of 5700 elk in existence likely represents the largest population in existence today at PORE. By all standards, the vulnerability to genetic bottlenecks, the recent significant population decline at the Pierce Point ranch and vulnerability to disease among herd animals, the Tule Elk should be protected and treated as a special status

species. Only 1.2 percent of elks original population exists today - once estimated at 500,000-pre gold rush. Shouldnt that trigger an endangered species listing?

U.S. Fish and Wildlife parameters for listing species described: A species is added to the list when it is determined to be endangered or threatened because of any of the following factors: " the present or threatened destruction, modification, or curtailment of its habitat or range; " over utilization for commercial, recreational, scientific, or educational purposes; " disease or predation; " the inadequacy of existing regulatory mechanisms; or " other natural or manmade factors affecting its survival. I am opposed to further subjecting Tule elk, to culling, hazing, hunting and sterilizing for those reasons. This magnificent species as well as snowy plovers, elephant seals, marine mammals, migration birds, and the multitude of wildlife at the seashore are our national treasure that deserves to be protected. In the future, the overuse of park resources and roads may be a limiting factor in park usage and access requiring a comprehensive plan for moving people with the least impact to resources. The EIS must consider the degradation of soils and overgrazing that led to impaired water listing at the Abbotts Lagoon by the State Regional Water Resources Control Board. Re-evaluate water quality and ranches on the Drakes Estero Restoration Project and assess their water quality improvement progress. Assess impacts on vernal, wet meadows and seeps located throughout the ranch zones.

The EIS should examine riparian and overgrazing cattle impacts leading to the extirpation of other endemic and rare species such as amphibians and salmonids. The PORE has hundreds of miles of watercourses, riparian zones, wetlands and water quality tests that an EIS must analyze to fully to determine water condition impacts as it relates to ranching and dairying permits. Fencing off riparian areas would be necessary in the short term should grazing continue.

New species of endemic and rare plants and lichen have been discovered at the Pt. Reyes Seashore. Some of those species were found at Pierce Point. The EIS must examine the impacts of human visitors, ranching and dairying on the flora and fauna.

The Tule elk, with other elk species, the largest land mammals in California are just a small but significant part of a once healthy ecosystem. The EIS should study the ecosystem services provided by the Elk in their range and consider how to make a human altered ecosystem whole again and with predators removed. Though the elk were reintroduced those actions are also covered in the NPS policies 4.4.1. : what the Parks responsibilities are.

I disagree with the conclusion that the limit of animals Tule elk is determined by the operational needs of the ranches because this appears to be in conflict with the policies of NPS; Instead we would like to see an accurate count of all existing cattle in the park and to determine if the ranches are in compliance with their use permits.

4.4.4 Management of Exotic Species Exotic species will not be allowed to displace native species if displacement can be prevented. 4.4.4.1 The Service will phase out the commercial grazing of livestock whenever possible and manage recreational and administrative uses of livestock to prevent those uses from unacceptably impacting park resources. And 4.4.4.2: Removal of Exotic Species Already Present All exotic plant and animal species that are not maintained to meet an identified park purpose will be managed-up to and including eradication-if (1) control is prudent and feasible, and (2) the exotic species • interferes with natural processes and the perpetuation of natural features, native species or natural habitats, or • disrupts the genetic integrity of native species, or • disrupts the accurate presentation of a cultural landscape

I am against the NPS proposed action that presents a minimum of 100 animals and a preliminary maximum of 160 animals in the Drakes Beach herd because it is adverse to 4.4.1.2 Genetic Resource Management Principles The Service will strive to protect the full range of genetic types (genotypes) of native plant and animal populations in the parks by perpetuating natural evolutionary processes and minimizing human interference with evolving genetic diversity. (NP Policies 2006)

Secretary Salazar made a political rather than a public interest decision when he authorized, against park policies, an expansion and extension of commercial grazing, niche ranching and dairying. Condoning 20-year lease

extensions contradicts parks overarching policies to phase out grazing and livestock; a potential adaptive management strategy to address climate change locally.

Any continuation of cattle and dairy cows should require an extensive carbon emissions study from growing cows and cattle, costs of raising, harvesting them and their milk as well as transportation of supplies and carcasses to and from market. Water and feed use must be studied also. The transmission of Johnnes from cattle to elk has been well documented and consideration should be given to a rare and vulnerable species.

Secretary Salazars failed to acknowledge the negative impacts done to the parklands by ranches and dairies and the requirement to fulfill the leases - to incorporate BMPs into their daily maintenance and practices. Those items are covered under: 4.1.6 Compensation for Injuries to Natural Resources and Compensation for Injuries to Cultural Resources 5.3.1.3

Socioeconomics and jobs The park following its rules and vision would create an expansive field of jobs in conservation, restoration, biotechnical engineering, cultural resource preservation, botany, biology, zoology, marine biology, cultural resources, archaeology, fire management tools, education, water quality testing, public speaking, docent, volunteerism and history. The PORE has can be instrumental in protecting and supporting recovering species and provide educational and social opportunities in land, plant, water, animal habitat restoration, conservation and land management skills. Socioeconomic benefits from cattle ranching cessation might see restoration of fisheries, more tourist satisfaction, and educational opportunities for land and water restoration, increased quantifiable ecosystem functions.

Opening up the PORE to bikes on trails should be studied in the EIS for impacts to wildlife. Generally it has been mistake. Riders already deviate from where they are allowed and are found off trail were there are likely special status and rare species. This recreational use is rampant with violations. Opening up more lands to mountain and electric bikers will result in degradation and species losses. The sheer ability to travel to further out locales will result in erosion, hazing, hyper-vigilance of visitors instead of relaxation, new illegal roads and diminishment habitat for wildlife and of enjoyment for almost all other park users. There has been significant evidence to verify a likely outcome of user conflicts coupled with natural resource value losses.

Address and assess the impacts to the parks from the perception of inhumane animal treatment camps on public lands and the obvious increase in people interested in humane treatment of animals exemplified by new State Proposition 12 that was passed by 63% of the vote.

Evaluate ranches on the Drakes Estero Restoration Project and assess their progress Assess impacts on vernal, wet meadows and seeps located throughout the ranch zones and ecologically precious. The Drakes Estero is surrounded by pollution producing ranches that have remained unchecked and where the streams and riparian zones are degraded.

I am abjectly opposed to the following alternatives because: At no time should lethal methods, hazing or whatever other measures as appropriate be used to control populations of Tule elk. Further, these alternatives violate the NPS policies. The following action alternatives are not acceptable.

Action Alternatives Continued Ranching and Removal of the Drakes Beach Tule Elk Herd- Existing ranch families would be authorized to continue beef and dairy operations under agricultural lease/ permits as described in the proposed action. Under this alternative, the Drakes Beach Tule elk herd would be removed using translocation outside of the park if practicable, or agency managed lethal methods.

" Take actions to minimize elk related impacts including: Hazing, fence repair and modification, water development, habitat improvement, and other measures as appropriate. The Drakes Beach free-range Tule elk herd would be managed at a level compatible with authorized ranching operations. The NPS would manage within that range using translocation outside of the park if practicable, or agency-managed lethal removal

methods. Additionally, the NPS will evaluate management of Tule elk from the Limantour free-range herd if they affect ranch lands.

Thank you for the opportunity to comment.

Sincerely,

Laura Chariton, MA Riparian Policy and Environmental Restoration

Appendices:

4 Natural Resource Management The National Park Service will preserve and protect the natural resources, processes, systems, and values of units of the national park system in an unimpaired condition to perpetuate their inherent integrity and to provide present and future generations with the opportunity to enjoy them.

4.4.1 General Principles for Managing Biological Resources The National Park Service will maintain as parts of the natural ecosystems of parks all plants and animals native to park ecosystems. The term plants and animals refers to all five of the commonly recognized kingdoms of living things and includes such groups as flowering plants, ferns, mosses, lichens, algae, fungi, bacteria, mammals, birds, reptiles, amphibians, fishes, insects, worms, crustaceans, and microscopic plants or animals. The Service will successfully maintain native plants and animals by " preserving and restoring the natural abundances, diversities, dynamics, distributions, habitats, and behaviors of native plant and animal populations and the communities and ecosystems in which they occur; " restoring native plant and animal populations in parks when they have been extirpated by past human-caused actions; and " minimizing human impacts on native plants, animals, populations, communities, and ecosystems, and the processes that sustain them. 4.4.4.1 Introduction or Maintenance of Exotic Species In general, new exotic species will not be introduced into parks. In rare situations, an exotic species may be introduced or maintained to meet specific, identified management needs when all feasible and prudent measures to minimize the risk of harm have been taken and it is " a closely related race, subspecies, or hybrid of an extirpated native species; or " an improved variety of a native species in situations in which the natural variety cannot survive current, human-altered environmental conditions; or " used to control another, already established exotic species; or " needed to meet the desired condition of a historic resource, but only where it is noninvasive and is prevented from being invasive by such means as cultivating (for plants), or tethering, herding, or pasturing (for animals). In such cases, the exotic species used must be known to be historically significant, to have existed in the park during the parks period of historical significance, to be a contributing element to a cultural landscape, or to have been commonly used in the local area at that time; or " an agricultural crop used to maintain the character of a cultural landscape, with rigorous review given to any proposal to introduce a genetically modified organism; or " necessary to provide for intensive visitor use in developed areas and both of the following conditions exist: o Available native species will not meet park management objectives. o The exotic species is managed so it will not spread or become a pest on park or adjacent lands. " a sterile, noninvasive plant that is used temporarily for erosion control; or " directed by law or expressed legislative intent. Domestic livestock such as cattle, sheep, goats, horses, mules, burros, reindeer, and llamas are exotic species that are maintained in some parks for commercial herding, pasturing, grazing, or trailing; for recreational use; or for administrative use for maintaining the cultural scene or supporting park operations. The policies applicable to the grazing of commercial domestic livestock are discussed in chapter 8, section 8.6.8. The Service will phase out the commercial grazing of livestock whenever possible and manage recreational and administrative uses of livestock to prevent those uses from unacceptably impacting park resources. 4.4.4.2 Removal of Exotic Species Already Present All exotic plant and animal species that are not maintained to meet an identified park purpose will be managed-up to and including eradication-if (1) control is prudent and feasible, and (2) the exotic species " interferes with natural processes and the perpetuation of natural features, native species or natural habitats, or " disrupts the genetic integrity of native species, or " disrupts the accurate presentation of a cultural landscape, or " damages cultural resources, or " significantly hampers the management of park or adjacent lands, or " poses a public health hazard as advised by the U. S. Public Health Service (which includes the Centers for Disease Control and the NPS public health program), or " creates a hazard to public safety. High priority will be given to managing exotic species that have, or potentially could have, a

substantial impact on park resources, and that can reasonably be expected to be successfully controlled. Lower priority will be given to exotic species that have almost no impact on park resources or that probably cannot be successfully controlled. Where an exotic species cannot be successfully eliminated, managers will seek to contain the exotic species to prevent further spread or resource damage. The decision to initiate management should be based on a determination that the species is exotic. For species determined to be exotic and where management appears to be feasible and effective, superintendents should (1) evaluate the species current or potential impact on park resources; (2) develop and implement exotic species management plans according to established planning procedures; (3) consult, as appropriate, with federal, tribal, local, and state agencies as well as other interested groups; and (4) invite public review and comment, where appropriate. Programs to manage exotic species will be designed to avoid causing significant damage to native species, natural ecological communities, natural ecological processes, cultural resources, and human health and safety. Considerations and techniques regarding removal of exotic species are similar to those used for native species (see 4.4.2.1 NPS Actions That Remove Native Plants and Animals). (Also see Executive Order 13112 (Invasive Species))

4.6 Water Resource Management 4.6.1 Protection of Surface Waters and Groundwaters The Service will perpetuate surface waters and groundwaters as integral components of park aquatic and terrestrial ecosystems. 4.6.2 Water Rights Water for the preservation and management of the national park system will be obtained and used in accordance with legal authorities. The Park Service will consider all available authorities on a case-by-case basis and will pursue those that are the most appropriate to protect water-related resources in parks. While preserving its legal remedies, the Service will work with state water administrators to protect park resources and participate in negotiations to seek the resolution of conflicts among multiple water claimants. Water essential for NPS needs will be purchased if it is not otherwise available. NPS consumptive use of water will be efficient and frugal, especially in water-scarce areas. All rights to the use of water diverted from or used on federal lands within the national park system by the United States or its concessioners, lessors, or permittees will be perfected in the name of the United States. Park surface waters or groundwater will be withdrawn for consumptive use only when such withdrawal is absolutely necessary for the use and management of the park. All park water withdrawn for domestic or administrative uses will be returned to the park watershed system once it has been treated to a degree that ensures that there will be no impairment of park resources. The Service may enter into contracts for the sale or lease of water to persons, states, or their political subdivisions that provide public accommodations or services for park visitors outside and near the park that have no reasonable alternative sources of water. The Service will authorize such contracts only if " the transfer does not jeopardize or unduly interfere with the natural or cultural resources of the park, and " the government's costs are fully recovered, and " the contract is for a short term, true emergency.

4.6.3 Water Quality The pollution of surface waters and groundwaters by both point and nonpoint sources can impair the natural functioning of aquatic and terrestrial ecosystems and diminish the utility of park waters for visitor use and enjoyment. The Service will determine the quality of park surface and groundwater resources and avoid, whenever possible, the pollution of park waters by human activities occurring within and outside the parks. The Service will " work with appropriate governmental bodies to obtain the highest possible standards available under the Clean Water Act for the protection for park waters; " take all necessary actions to maintain or restore the quality of surface waters and groundwaters within the parks consistent with the Clean Water Act and all other applicable federal, state, and local laws and regulations; and " enter into agreements with other agencies and governing bodies, as appropriate, to secure their cooperation in maintaining or restoring the quality of park water resources. (See Pest Management 4.4.5; Soil Resource Management 4.8.2.4; Backcountry Use 8.2.2.4; Domestic and Feral Livestock 8.6.8; Mineral Exploration and Development 8.7; Water Supply Systems 9.1.5.1; Wastewater Treatment Systems 9.1.5.2; Waste Management and Contaminant Issues 9.1.6; Facilities for Water Recreation 9.3.4.2. Also see Directors Order #83: Public Health)

4.6.5 Wetlands The Service will manage wetlands in compliance with NPS mandates and the requirements of Executive Order 11990 (Protection of Wetlands), the Clean Water Act, the Rivers and Harbors Appropriation Act of 1899, and the procedures described in Directors Order 77-1 (Wetland Protection). The Service will (1) provide leadership and take action to prevent the destruction, loss, or degradation of wetlands; (2) preserve and enhance the natural and beneficial values of wetlands; and (3) avoid direct and indirect support of new construction in

wetlands unless there are no practicable alternatives and the proposed action includes all practicable measures to minimize harm to wetlands. The Service will implement a no net loss of wetlands policy. In addition, the Service will strive to achieve a longer-term goal of net gain of wetlands across the national park system through restoration of previously degraded or destroyed wetlands. When natural wetland characteristics or functions have been degraded or lost due to previous or ongoing human actions, the Service will, to the extent practicable, restore them to predisturbance conditions. The Service will conduct or obtain parkwide wetland inventories to help ensure proper planning with respect to the management and protection of wetland resources. Additional, more detailed wetland inventories will be conducted in areas that are proposed for development or are otherwise susceptible to degradation or loss due to human activities. When practicable, the Service will not simply protect but will seek to enhance natural wetland values by using them for educational, recreational, scientific, and similar purposes that do not disrupt natural wetland functions. For proposed new development or other new activities, plans, or programs that are either located in or otherwise could have adverse impacts on wetlands, the Service will employ the following sequence: " Avoid adverse wetland impacts to the extent practicable. " Minimize impacts that cannot be avoided. " Compensate for remaining unavoidable adverse wetland impacts by restoring wetlands that have been previously destroyed or degraded. Compensation for wetland impacts or losses will require that at least 1 acre of wetlands be restored for each acre destroyed or degraded. Actions proposed by the Park Service that have the potential to cause adverse impacts on wetlands must be addressed in an environmental assessment or an environmental impact statement. If the preferred alternative will result in adverse impacts on wetlands, a statement of findings must be prepared and approved in accordance with Directors Order #77-1: Wetland Protection. (See Decision-making Requirements to Identify and Avoid Impairments 1.4.7; Siting Facilities to Avoid Natural Hazards 9.1.1.5) 4.6.6 Watershed and Stream Processes The Service will manage watersheds as complete hydrologic systems and minimize human- caused disturbance to the natural upland processes that deliver water, sediment, and woody debris to streams. These processes include runoff, erosion, and disturbance to vegetation and soil caused by fire, insects, meteorological events, and mass movements. The Service will manage streams to protect stream processes that create habitat features such as floodplains, riparian systems, woody debris accumulations, terraces, gravel bars, riffles, and pools. Stream processes include flooding, stream migration, and associated erosion and deposition. The Service will protect watershed and stream features primarily by avoiding impacts on watershed and riparian vegetation and by allowing natural fluvial processes to proceed unimpeded. When conflicts between infrastructure (such as bridges and pipeline crossings) and stream processes are unavoidable, NPS managers will first consider relocating or redesigning facilities rather than manipulating streams. Where stream manipulation is unavoidable, managers will use techniques that are visually nonobtrusive and that protect natural processes to the greatest extent practicable. (See Floodplains 4.6.4; Shorelines and Barrier Islands; 4.8.1.1; Facility Planning and Design 9.1.1. Also see Unified Federal Policy for a Watershed Approach to Federal Land and Resource Management, 65 FR 62566, October 18, 2000)

4.7 Air Resource Management 4.7.1 Air Quality The National Park Service has a responsibility to protect air quality under both the 1916 Organic Act and the Clean Air Act (CAA). Accordingly, the Service will seek to perpetuate the best possible air quality in parks to (1) preserve natural resources and systems; (2) preserve cultural resources; and (3) sustain visitor enjoyment, human health, and scenic vistas. Vegetation, visibility, water quality, wildlife, historic and prehistoric structures and objects, cultural landscapes, and most other elements of a park environment are sensitive to air pollution and are referred to as air quality-related values. The Service will actively promote and pursue measures to protect these values from the adverse impacts of air pollution. In cases of doubt as to the impacts of existing or potential air pollution on park resources, the Service will err on the side of protecting air quality and related values for future generations.

4.7.2 Weather and Climate Earths climate has changed throughout history. Although national parks are intended to be naturally evolving places that conserve our natural and cultural heritage for generations to come, accelerated climate change may significantly alter park ecosystems. Thus, parks containing significant natural resources will gather and maintain baseline climatological data for reference. Because any human attempt to modify weather has the potential to alter the natural conditions in parks, the Service will not conduct weather-modification activities, the Service will seek to prevent weather modification activities conducted by others from affecting a parks weather, climate, and resources. (See NPS-conducted or -sponsored Inventory, Monitoring, and Research Studies

4.2.1; Miscellaneous Management Facilities 9.4.5) Attached are relevant policies from the National Park Service Management Policies 2006 handbook. https://www.nps.gov/policy/MP_2006.pdf

8.6.8.2 Managing Agricultural Grazing The National Park Service must manage its resources in a manner that conserves them for future generations. Parks with agricultural livestock use, including parks where such use is administered by another agency, must address this use in an appropriate planning document. Agricultural livestock grazing will use best management practices to protect park resources, with particular attention being given to protecting wetland and riparian areas, sensitive species and their habitats, water quality, and cultural resources. Managers must regulate livestock so that (1) ecosystem dynamics and the composition, condition, and distribution of native plants and animal communities are not significantly altered or otherwise threatened; and (2) cultural values are protected. A comprehensive monitoring program must be implemented, and adaptive management practices must be used to protect park resources.

Management of Exotic Species Exotic species will not be allowed to displace native species if displacement can be prevented.

4.4.1.2 Genetic Resource Management Principles The Service will strive to protect the full range of genetic types (genotypes) of native plant and animal populations in the parks by perpetuating natural evolutionary processes and minimizing human interference with evolving genetic diversity. When native plants or animals are removed for any reason—such as hunting, fishing, pest management, or culling to reduce unnatural population conditions resulting from human activities—the Service will maintain the appropriate levels of natural genetic diversity.

8.9 Consumptive Uses Consumptive uses of park resources may be allowed only when they are " specifically authorized by federal law or treaty rights (such as hunting trapping, or mining, or subsistence use in specifically identified parks); " specifically authorized pursuant to other existing rights (such as a right retained by a donor of the land on which the use would occur); " grazing activities authorized in accordance with section 8.6.8.1; or " traditional visitor activities, such as fishing or berry picking, that are authorized in accordance with NPS general regulations.

The Public Trust Doctrine protects tule Elk. According to The Public Trust Doctrine, Tule Elk and all wildlife are protected on both public and private lands for present and future generations as an integral component of the native landscape. ... All citizens have a moral and ethical responsibility to protect all native species including Tule Elk.

The principle that certain natural and cultural resources are preserved for public use, and that the government owns and must protect and maintain these resources for the public's use. The public trust doctrine is the principle that the sovereign holds in trust for public use some resources such as shoreline between the high and low tide lines, regardless of private property ownership. POINT REYES NATIONAL SEASHORE Winter Tule Elk Census Completed at Point Reyes

During the 2017-2018 winter months, Point Reyes National Seashore wildlife staff completed Tule elk surveys at Drakes Beach, Tomales Point, and the Limantour/Estero Road area in order to determine 2017 population levels. POINT REYES NATIONAL SEASHORE Rare Plant Inventory for Point Reyes National Seashore

Point Reyes National Seashore hosts over 900 species of flowering plants, representing approximately 16% of the plant species known to occur in California. This diverse flora includes 48 rare plant species. Successful management of rare plant species requires comprehensive information describing their abundance and distribution. The National Park Service conducted rare plant field surveys between March and September of 2001 through 2004. POINT REYES NATIONAL SEASHORE New Population of Rare Species Found at Point Reyes

San Francisco Bay Area Inventory & Monitoring Program staff recently confirmed the presence of a previously undocumented population of Erigeron supplex, or supple daisy, at Pierce Point in Point Reyes National Seashore.

This species is considered rare and endangered in California and elsewhere, and is known from only a few populations on the coast between Salt Point and Mendocino.

Rare Lichen Discovered at More Bay Area National Park Sites In 2015, biologists found the globally rare island tube lichen (*Hypogymnia schizidiata*) on Montara Mountain during a baseline lichen inventory for the Rancho Corral de Tierra unit of the Golden Gate National Recreation Area. In subsequent years, the lichen has also been discovered in the Marin Headlands in Golden Gate, and on Mt Vision in Point Reyes National Seashore. POINT REYES NATIONAL SEASHORE Plant-Predator Connections: Protecting an Endangered Species at Point Reyes Since 2005, Point Reyes National Seashore's Vegetation Resources branch has been studying endangered Tidestrom's lupine populations in partnership with Washington University. Most recently, they have published research about the fate of an imperiled population near Abbotts Lagoon, where a large habitat restoration project took place in 2011. They have found that, post-restoration, the plants are doing much better. POINT REYES NATIONAL SEASHORE A Productive Western Snowy Plover Breeding Season Comes to a Close The 2017 Western Snowy Plover breeding season officially wrapped up at Point Reyes National Seashore at the end of August, with the last brood fledging a single chick on North Beach. This season saw a total of 46 nests. Coho Salmon: Monitoring to Understand Change

Coho have a complex fresh and saltwater lifecycle. Because females are three years old when they spawn, every three years represents a distinct cohort, or different group of fish that are living on the same three year cycle together. Three cohorts live in San Francisco Bay Area streams. Year-round monitoring captures coho population dynamics at each life stage, and also for each cohort over time. CALIFORNIA FORUM Californias elk need protection. The state needs to try harder to bring them back BY JANE BRAXTON LITTLE April 10, 2018 12:00 PM Updated April 13, 2018 08:11 PM Elk are Californias largest land mammal. At 500 pounds with three-foot antlers, their sheer size inspires wonder. And for anyone who has watched cows and their calves emerge from the trees to cross an open meadow, or heard bulls bugling during the annual fall rut, the majesty of these animals is unparalleled. Today the states three elk species face an uncertain future. AT A TIME WHEN ELK, NOW ESTIMATED AT NEARLY 13,000 ANIMALS, ARE MAKING A SLOW BUT GRADUAL COMEBACK, STATE WILDLIFE OFFICIALS MISSED AN OPPORTUNITY TO CONTRIBUTE. More than 500,000 of them once roamed from the states northwest corner south into Ventura County: Roosevelt, Rocky Mountain and tule elk, which are found nowhere else. By 1872 only a few of this smallest California species remained. And while a variety of largely uncoordinated efforts were made to protect elk in California, by the 1960s the population had plummeted to around 1,600 animals. That prompted legislators in 2003 to call for a statewide elk management plan. In November - a full 15 years later - California Department of Fish and Wildlife officials released it. The protracted delay between legislation to protect Californias elk and the draft management plan it mandated is one telling reflection of the disregard department officials accord this species. The 450-page plan is another. As the first statewide look at recovering a species that was pushed to the brink of extinction, the plan is long on minutia and short on science. It sets any number of specific goals and objectives for each of the 22 high-priority elk management units it identifies, but offers no overarching conservation strategy to achieve them. It describes population growth rates in specific small areas but lacks any clear unifying structure for advancing holistic recovery. This plan suffers from an overzealous focus on trees thereby forgetting and misunderstanding the forest, said Rick A. Hopkins, a private consultant with expertise in the ecology and biology of large mammals. The Fish and Wildlife Department developed the elk management plan with input from hunting and agricultural groups as well as other state and federal agencies. Scientists and conservation groups were not consulted and the plan was not peer reviewed. That may explain its emphasis on hunting to control populations and resolve human-elk conflicts, primarily broken fences and crop damage. While it discusses options to reduce the harm elk can cause, including hazing, physical barriers and repellents, the plan calls hunting the recommended primary method of population control. Yet it provides little of the basic information on elk abundance and distribution, numbers needed to inform hunting quotas. More troubling is the plans discussion of wolves and their potential to prey on elk, possibly extirpating local populations. Although the states known population of wolves is still in the single digits, elk management needs to be concerned with increased kills as wolf population grows, said Joe Hobbs, state elk coordinator. No one really knows how wolves will impact elk populations, he told me. That is certainly true for California, but wildlife managers in neighboring states have documented wolf-elk interaction in a variety of scientific studies. In most cases they find that wolves contribute to an ecological balance of elk and deer

populations, generally enhancing both plant and animal biodiversity. Instead, the California plan scapegoats wolves, laying the groundwork for killing them if the states arbitrary elk population targets are not met, said Jeff Miller, a spokesman for the Center for Biological Diversity, a non-profit conservation organization. At a time when elk, now estimated at nearly 13,000 animals, are making a slow but gradual comeback, state wildlife officials missed an opportunity to contribute. Their recovery plan should have provided basic population information and determined the minimum levels populations need to survive. It is encouraging that elks are expanding in the redwoods of Humboldt County and the meadows of Modoc and Lassen counties. They are valued not just by the 36,000 people who apply annually for 330 tags to hunt them. Wildlife watchers now comprise a constituency seven times the number of hunters, according to Department of Interior data. Past management nearly caused elk to go extinct in California. State wildlife officials can do better by this species treasured by hunters and environmentalists alike. The department should review its elk management plan with independent wildlife biologists who have scientific expertise. For an indigenous species that roamed California long before humans arrived, we owe them that at the least. Jane Braxton Little, a freelance writer, covers science, natural resources and rural Northern California from Plumas County. Contact her at www.janebraxtonlittle.com or on Twitter @JBraxtonLittle.

#1337

Name: Krieger, Fred

Correspondence: 1) The EIS should include a suboption of remediating the damage caused by the ranching options. These include: - Damage to Abbotts lagoon identified by USGS and caused by sediment and nutrients from a dairy (sampling in 1999/2000). One of the lagoons has been partially filled by this runoff and NPS has a positive obligation to remediate it. The filling of the lagoon also appears to violate the Clean Water Act.

- The trails cut by the cattle in hillsides and near the ranches should be assessed and remediated.

- Legacy pesticides which have been detected at Pt Reys, presumably from the ranching operations

2) The EIS should also assess negative impacts on users of the cattle. On the Bull Pt Trail, the cattle sometimes follow hikers and this can be intimidating.

3) The EIS should contain a comprehensive assessment of the environment benefits of terminating all leases.

4) The EIS should assess the impact of runoff into Tomales Bay and the ocean carrying bacteria from the ranching operations. This should include the affects o the 303(d) listing and TMDL for bacteria in Tomales Bay.

In general, I support the removal of the cattle from the Park, same as the removal of the fallow deer.

Incidentally, a 30-day comment period is not adequate.

#1338

Name: Cutrano, Chance

Correspondence: Since 1985, Resource Renewal Institute (RRI) has worked to strengthen society's ability to secure the future health of the planet by fostering innovative solutions to increasingly complex environmental problems. RRI combines education, advocacy, organizational development, and sustainability analysis to leverage the global adoption of long-term environmental management strategies to benefit natural resources, wildlife, and society.

RRI was founded in 1985 by former California Secretary of Resources and founder of the Trust for Public land, Huey Johnson. Before the seashore was a unit of the National Park Service (NPS), Mr. Johnson met with the Secretary of Interior Rogers Morton to discuss the future of the land. Starting in the 1960s, Mr. Johnson spent fifteen years trying to figure out how to acquire 2,300 acres of private land and valuable shoreline in Point Reyes

that housed telephone poles and turn it into open space. Huey eventually acquired this land through a deal between RCA and Trust for Public Land. It was subsequently sold to the Department of the Interior (DOI). Huey was often asked to out to the seashore to acquire properties the National Park Service had trouble securing. One example of his dealings was the acquisition of property that belonged to Bob Power.

As a stakeholder invested in the future of Point Reyes National Seashore (PRNS) and the north district of Golden Gate National Recreation Area (GGNRA), RRI is responding to your Notice of Intent and Invitation to Participate in the development of a General Management Plan Amendment (GMPA) and an Environmental Impact Statement (EIS) for the management of priority planning areas of PRNS and the GGNRA.

Purpose, Need and Structure of GMP Amendment

The scoping notice does not explicitly state a purpose and need for the GMP amendment and EIS, which makes it difficult for the public to adequately provide scoping comments. The notice states that the GMP amendment will update guidance for the preservation of natural and cultural resources, the management of infrastructure and visitor use in the planning area, and as appropriate, direct specific strategies for managing agricultural lease/permits and tule elk for lands in the planning area. This assertion, if representative of the purpose and need, fails to explain that a GMP is defined under Park Service policies as:

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; (2) clearly defines the necessary conditions for visitors to understand, enjoy, and appreciate the parks significant resources, and (3) identifies the kinds and levels of management activities, visitor use, and development that are appropriate for maintaining the desired conditions; and (4) identifies indicators and standards for maintaining the desired conditions (2006 NPS Management Policies at 2.2).

Further, the defined purpose of a general management plan is to ensure that the park has a clearly defined direction for resource preservation and visitor use (2006 NPS Management Policies at 2.3.1).

The Park Service must follow its policies that describe how the planning process should occur and what must be involved, which include:

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.

The approved plan will create a realistic vision for the future, setting a direction for the park that takes into consideration the environmental and financial impact of proposed facilities and programs and ensures that the final plan is achievable and sustainable. The plan will take the long view, which may project many years into the future, when dealing with the time frames of natural and cultural processes. The first phase of general management planning will be the development of the foundation statement. The plan will consider the park in its full ecological, scenic, and cultural contexts as a unit of the national park system and as part of a surrounding region. The general management plan will also establish a common management direction for all park divisions and districts. This integration will help avoid inadvertently creating new problems in one area while attempting to solve problems in another (2006 NPS Management Policies at 2.3.1).

Each parks approved general management plan will include 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. Even in historic structures, one

floor might be most appropriate for exhibits, while another could accommodate offices or administrative uses. Some desired conditions may apply parkwide, but the delineation of management zones will illustrate where there are differences in intended resource conditions, visitor experiences, and management activities (2006 NPS Management Policies at 2.3.1.2).

As it relates to the GMPs full and proper use of scientific and scholarly information, RRI requests the NPS conduct studies on current conditions within the planning area to establish a robust environmental baseline. This baseline will help the NPS, stakeholders, and the general public determine the direction of future trends within the planning area. These trends may include, but are not limited to, climate change impacts, water supply, water contamination, protection and restoration of wildlife communities, protection and restoration of plant communities, landscape productivity as it relates to agriculture, visitation and use, costs related to preservation and restoration of cultural resources, funding and staffing for the NPS at PRNS.

Recommended Topics of Study To adequately prepare for the GMP/EIS process and provide sufficient information for meaningful public comment, RRI recommends further study be done and information to the public be provided regarding the following topics:

Elk Management Evaluate the carrying capacity of the entire PRNS and GGNRA for tule elk and whether the current elk population is anywhere near that capacity. Evaluate the potential for rebuilding large elk herds at PRNS and the benefits such herds would provide for the genetic diversity and long term persistence of the species. Discuss 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. Evaluate the consequences of continuing to keep the Tomales Point herd fenced or fencing out the Drakes Beach herd rather than allowing elk to move freely to find water and food.

Endangered Species Identify, map, and evaluate all habitats for wildlife and plants listed under the federal and state Endangered Species Acts as endangered, threatened or a species of special concern, as well as protective buffers needed to maintain ecological function for their suitable habitat. Identify and evaluate all designated critical habitat for federally listed species at PRNS and GGNRA and where ranching leases overlap or runoff drains into critical habitat. Identify where ranching and dairying activities overlap with habitat for state listed species. Evaluate which ranching and dairying activities and uses within the ranch leases areas conflict with or support providing maximum protection for sensitive species or their critical habitat. Evaluate which ranching and dairying activities and uses within the ranch leases areas are compatible with or conflict with protection and recovery of federally listed species. Evaluate any adverse or potentially significant impacts (under NEPA) from ranching activities on designated critical habitat for any federally listed species. Evaluate what limitations or mitigation measures are needed for ranching activities that conflict with protection of listed species. Identify where removal of important habitat areas from the designated pastoral zone is needed to protect listed species. Identify where exclusionary fencing is needed to protect sensitive habitats for listed species from livestock. Identify where reduced stocking levels of livestock in overgrazed areas is needed to protect listed species. Identify where a prohibition on silage and mowing is needed to protect sensitive species. Identify where removal and control of invasive species is needed to protect sensitive species.

Salmon and Steelhead Evaluate any potentially significant impacts (under NEPA) from ranching activities on Central California Coast coho salmon, California Coastal Chinook salmon, or salmon habitat. Evaluate any potentially significant impacts (under NEPA) from ranching activities on Central California Coast steelhead trout or trout habitat. Identify any continuing or unresolved ranching impacts on salmonid habitat in Olema Creek and tributaries, Lagunitas Creek and tributaries, and tributaries of Drakes Estero. Identify what salmonid protection measures from the 2004 NMFS Biological Opinion for salmonids have not been implemented. Identify which stream reaches with livestock grazing do not have 15 to 30 meter riparian buffers. Discuss the results of salmonid habitat and riparian monitoring within the planning area, as required by the 2004 NMFS Biological Opinion for salmonids. Identify any continuing problems and impacts to salmonid streams and habitat from cattle grazing in PRNS and GGNRA. Discuss where and how often suspended sediment, nutrient or fecal coliform thresholds have been exceeded in salmonid streams, whether ongoing problems have been identified, and what remedies have been implemented. Discuss where and how often water temperature thresholds have been exceeded in salmonid streams, whether ongoing grazing

problems have been identified, and what remedies have been implemented. Discuss whether excessive sedimentation issues and impacts to channel form and morphology have been identified in salmonid streams from grazing and what remedies have been implemented. Discuss whether damage, loss or inhibition of growth of riparian vegetation has been identified in salmonid streams. Discuss whether the NPS has met the 2004 NMFS Biological Opinion success criteria for riparian vegetation. Discuss whether erosion of streambanks or loss of habitat complexity has been identified in salmonid streams from grazing and what remedies have been implemented. Discuss the results of monitoring for suspended sediment, fecal coliform, channel bed conditions, water temperatures, and riparian vegetation conditions in salmonid streams, as required by the 2004 NMFS Biological Opinion. Discuss whether and how NPS has ensured that aquatic and riparian habitat conditions in salmonid streams continue to improve and remain in good condition. California Red-legged Frog Evaluate and discuss any adverse or potentially significant impacts (under NEPA) from ranching activities on the California red-legged frog, or frog habitat. Evaluate and discuss livestock grazing impacts on red-legged frog habitat in terms of riparian and wetland habitat alteration, water pollution, damage to breeding sites, and trampling of estivation habitat. Identify the measures the NPS has taken since 2002 to protect seasonal upland habitats and travel corridors for CRLF from impacts by cattle.

Western Snowy Plover Evaluate and discuss any adverse or potentially significant impacts (under NEPA) from ranching activities on western snowy plovers or plover habitat. Discuss whether any cattle have had access to snowy plover nesting areas at PRNS since 2002, including trespass cattle. Discuss changes in populations of common ravens at PRNS since the 2002 USFWS Biological Opinion, and the role dairies and ranches have in elevating raven populations. Discuss raven predation on snowy plovers at PRNS since the 2002 Biological Opinion. Identify what measures have been taken to reduce feeding opportunities for common ravens at ranches and dairies. Discuss whether the NPS has allowed any increase in silage production or whether the NPS has returned any silage fields to permanent pasture, since the 2002 Biological Opinion.

Myrtles Silverspot Butterfly Evaluate and discuss any adverse or potentially significant impacts (under NEPA) from ranching activities on the Myrtles silverspot butterfly or butterfly habitat. Discuss any evidence of livestock trampling host plants or butterfly larvae. Identify NPS mapping and monitoring of Myrtles silverspot butterfly larval host and nectar plants, and responses of these plants to different grazing regimes. Evaluate and discuss any change in status of Myrtles silverspot butterfly populations and host plants at PRNS since the 2002 Biological Opinion. Discuss the measures NPS has taken to remediate adverse impacts to Myrtles silverspot butterfly and host plants from cattle grazing.

Listed Plants Evaluate and discuss any adverse or potentially significant impacts (under NEPA) from ranching activities on Sonoma alopecurus, Sonoma spineflower, Marin dwarf flax, Tiburon paintbrush, Beach layia, or Tidestroms lupine. Evaluate and discuss the scientific evidence that excessive livestock grazing adversely affects Sonoma alopecurus. Discuss the trends of Sonoma alopecurus populations subject to livestock grazing. Evaluate and discuss the scientific evidence that livestock grazing negatively affects the Tiburon paintbrush. Discuss the trends of Tiburon paintbrush populations subject to livestock grazing. Evaluate and discuss the scientific evidence that livestock grazing may negatively affect the Sonoma spineflower. Discuss the trends of Sonoma spineflower populations subject to livestock grazing. Evaluate and discuss the scientific evidence that livestock grazing is a major threat to Tidestroms lupine, due to loss of dune habitat. Discuss the trends of Tidestroms lupine populations subject to livestock grazing. Identify NPS mapping and monitoring of these listed plants, and discuss responses of these plants to different grazing regimes. Discuss any change in the status of populations of these listed plants at PRNS since the 2002 Biological Opinion. Discuss any measures taken to remediate adverse impacts from grazing to any of these listed plants, including: seasonal restrictions on grazing; exclusion fencing; and establishment and plantings.

Water Quality Impacts Evaluate and discuss the current condition of fresh water resources within the ranching areas, and any impairment due to grazing and ranching activities. Evaluate and discuss impairment to water quality in creeks within PRNS and GGNRA from livestock grazing and dairies. Evaluate and discuss impairment to water quality in wetlands and other freshwater habitats within PRNS and GGNRA, including Drakes Estero and Abbotts Lagoon, from livestock grazing and dairies. Evaluate and discuss impairment to water quality in

Tomales Bay due to livestock grazing and dairies at PRNS and GGNRA. Waters within the planning area 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. Evaluate and discuss current fecal coliform, ammonia and bacteria inputs to creeks and freshwater habitats from livestock grazing and dairies, and the impacts on aquatic wildlife and ecosystems. Evaluate and discuss current nutrient inputs to creeks and freshwater habitats from livestock grazing and dairies, and the impacts on aquatic wildlife and ecosystems. Evaluate and discuss current sediment inputs to creeks and freshwater habitats from livestock grazing and dairies, and the impacts on aquatic wildlife and ecosystems. Evaluate and discuss how dairies and livestock grazing leases control or fail to control livestock waste discharge and runoff. Evaluate and discuss what needs to be done to remediate the impairment of water quality by livestock grazing and provide aquatic resources with maximum protection, restoration and preservation as required by the parks enabling legislation and the Organic Act. Discuss NPS plans to restore creek banks and riparian zones negatively impacted by former or current ranch operations. What scientifically based buffer zones and setbacks are in place for grazing and ranching operations near streams, riparian areas and wetlands to ensure their ecological function? Identify any uses of pesticides or other toxic chemicals at ranches and dairies. Analyze and disclose the ecological impacts from dams and stock ponds on ranchlands. Discuss how the NPS will ensure that ranching leases comply with water quality standards as required by the Federal Facilities provision of the Clean Water Act. Discuss how the NPS will consider whether GMP alternatives comply with the Coastal Zone Management Act. The San Francisco Bay Regional Water Quality Control Board commented on the previously proposed Ranch Comprehensive Management Plan and expressed concerns whether PRNS ranching operations operate in compliance with current federal and state regulations, including Waste Discharge Requirements and/or waivers of WDRs issued by the Water Board. The Board stated [w]e would like to see specific details developed in the Final NEPA document that address rangeland assessment and facility inspections, compliance monitoring, record-keeping, implementation of management practices, reporting, and, if necessary, enforcement. The Final NEPA document should also discuss NPS enforcement of State and federal regulations. Discuss how the GMP amendment will address these issues raised by the Water Board. Discuss how the NPS will address specific issues raised by the Water Board, including: water supply development; impacts to riparian zones; performance standards for fencing; maintenance of dairy and ranch land infrastructure; farmstead storm water BMPs; and water quality monitoring program. The Water Board requested evaluation of bacteriological water quality impacts associated with cattle being grazed near, or allowed direct access to creeks where they sometimes linger. How will the GMP amendment address this issue? The Water Board noted that the NPS has prioritized and completed water pollution remediation actions in some tributaries, but cattle still gain access to several creeks not identified as "top- priority" tributaries. The Water Board stated that it isn't clear how the NPS determined what constitutes a "top priority" and if it has evaluated the water quality impacts of having cattle in "lower priority" tributaries. How will the GMP amendment address this issue?

Other Wildlife and Habitat Impacts Evaluate and discuss livestock grazing impacts to native vegetation at PRNS and GGNRA. Evaluate and discuss on livestock grazing impacts to riparian areas at PRNS and GGNRA. Identify the amount of water use needed for beef and dairy cattle production at PRNS and GGNRA; quantify how that impacts water available for native wildlife and plants. Discuss any rancher depredation of wildlife or requests for wildlife control at PRNS and GGNRA. Identify whether the NPS pays or allows any other agency or entity to manage or depredate wildlife on PRNS and GGNRA lands.

Forage Discuss how the NPS determines how much forage is available for livestock on each ranch lease, and identify the forage levels on each ranch lease. Discuss and quantify the forage needs of tule elk, deer, and other native grazing and browsing animals in PRNS and GGNRA. Discuss how the NPS determines what percentage of available forage should go to livestock rather than to native wildlife. Discuss how the NPS determines whether cattle grazing leases and silage operations will leave adequate forage for native grazing and browsing animals during dry and drought years. Discuss the NPS analysis of PRNS grazing (RDM or Residual Dry Matter monitoring), which found overgrazing at several ranches. Discuss how RDM levels are established for lease areas and whether they are adequately protective of native ecosystems and wildlife. Evaluate and discuss why the NPS has chronically failed to enforce existing RDM standards for grazing leases, and how it will enforce them in the future to prevent overgrazing, erosion, and sediment loading into adjacent bodies of water via runoff. Evaluate

and discuss documentation of overstocking of cattle and other violations of lease conditions, and NPS failure to enforce lease stocking allowances. Evaluate and discuss whether current and proposed livestock stocking levels are maximally protective of creeks, wetlands, wildlife habitat and water quality. Adjust and update the parks definition of AUMs to accurately reflect the current weights of dairy and beef cattle and their actual forage consumption. Discuss the impact of mowing for silage on breeding birds, per the 2015 Point Blue report documenting declines in grassland bird abundance and nesting at PRNS. Best Management Practices What sort of Best Management Practices does the NPS require through grazing leases? How does the NPS determine BMPs for grazing leases?(Are the BMPs adequate to protect natural resources?(How much are BMPs monitored? How are BMPs enforced? Disclose examples. Evaluate and discuss the effectiveness of achieving conservation goals using either US Department of Agriculture or US Department of Interior grazing BMPs? Discuss the rationale for implementation of either at PRNS. Assess the effectiveness of current BMPs in protecting natural resources. Invasive Species Discuss the extent to which exotic and invasive plants exist in the ranch areas. Discuss which invasive plants were brought to PRNS and GGNRA by cattle. Identify where invasive plants are spread or maintained by cattle grazing and silage production. Discuss how cattle grazing, importation of hay, and other ranching activities promote the spread of invasive plants. Evaluate and discuss how much feed is imported as a percentage of total feed for cattle at PRNS. Discuss how NPS intends to control invasive plants in the lease areas. Discuss the science regarding whether and under what conditions cattle grazing can help control or spread invasive plants. Identify where and under what circumstances cattle grazing would be used for invasive plant control, and whether the proposed grazing regimes are reflective of actual grazing practices in lease areas and are enforceable by NPS. Discuss elevated populations of invasive starlings and native cowbirds due to ranching and dairy operations, and the impacts on nesting of native and migratory birds. Discuss elevated populations of ravens due to ranching and dairy operations and impacts on native and migratory birds, particularly snowy plovers. Disease Transmission Discuss the presence and extent of Johnes Disease in wildlife and livestock at PRNS and GGNRA, and the potential and most likely routes of transmission. Discuss the relative potential for Johnes Disease to be transmitted from livestock to elk and other wildlife; and from wildlife to livestock. Discuss whether these diseases existed in the park before the reintroduction of elk. Discuss the historical presence of these diseases in PRNS and GGNRA livestock and the conditions of dairying and ranching activities which can act as a vector for these diseases. Discuss what role the ranching practice of spreading cattle manure on grasslands likely has in transmitting these diseases to native wildlife. What risk, if any, does the spreading of infected manure pose to humans recreating throughout the seashore? Discuss the NPS monitoring plan for PRNS and GGNRA livestock for presence of Brucellosis, Johnes Disease, and other livestock diseases which can harm native wildlife. Discuss the NPS remediation plan for eliminating these diseases from PRNS and GGNRA livestock. Fencing Identify where exclusion fencing has been installed to keep livestock out of creeks, riparian areas, wetlands, and freshwater aquatic habitats. Evaluate and discuss the condition, effectiveness, and monitoring of this exclusion fencing. Identify where such exclusion fencing does not exist and where livestock have access to creeks, riparian areas, wetlands, and freshwater aquatic habitats. Discuss issues with lack of maintenance and repair of cattle exclusion fencing, which allows trespass cattle into sensitive areas within PRNS and the GGNRA.

Identify which fences in PRNS and GGNRA are not wildlife friendly, and the potential impacts on elk and other native wildlife. Discuss injuries to and deaths of native wildlife from fencing. Identify fencing that is unneeded or no longer in use for cattle and provide a timeline for derelict fence removal to improve movement of wildlife. Roads Evaluate and discuss the science showing that ranch roads contribute to erosion, sedimentation of streams, and pollution. Evaluate and discuss the extent to which PRNS and GGNRA ranch roads fragment habitat or affect wildlife movement. Evaluate and discuss the impact that ranching and dairying trucks have on roads, and the extent to which additional repairs are needed on main roads due to impacts from heavy ranching vehicles and equipment. Evaluate and discuss how public recreation and visitation is affected due to roads impacted by heavy ranching vehicles and equipment. Fire Discuss the science which supports the concept of using grazing to control fire fuels. Discuss the California Department of Parks and Recreation's comprehensive analysis of cattle grazing impacts and its minimal effect on standing biomass and fire hazard reduction on Mount Diablo State Park, and CDPR's experience in managing wildlands without livestock grazing. Greenhouse Gasses Discuss how ranching and dairying activities subvert PRNS goals in the Climate Friendly Parks campaign. Discuss 2005 PRNS analysis that 78% of the parks carbon emissions are from dairy wastes (or manure) in the form of methane gas. Identify what portion of the remaining park emissions from transportation sources are from ranching lease activities.

Update the parks outdated GHG emissions inventory conducted in 2005. Discuss current estimate of livestock and dairy ranching contribution to PRNS greenhouse gas emissions and what percentage that represents (include all CO₂ contributions, including methane emissions from dairies, contributions from milk, hay and manure trucks, farm equipment, etc.). Will the NPS require methane digesters at any continuing dairies? Evaluate whether concentrated animal feeding operations such as dairies have serious impacts on air pollution and human health from ammonia and other gases within PRNS. Discuss whether any peer-reviewed science supports the concept of carbon sequestration through livestock grazing, and what can realistically be sequestered versus the CO₂ footprint of ranching operations. The GMP amendment should ban manure spreading on rangelands and explore the enforceable lease provisions requiring the use of compost instead. The GMP should promote native, long root perennial grassland restoration to sequester carbon. Public Access/Recreation Identify where dairying operations and facilities and fencing are not compatible with public access. Discuss how ranching impedes recreational enjoyment due to cattle waste, unpleasant odors and sights, an industrialized landscape, mowing, reduced wildlife sightings, trail erosion, and a lack of hiking and biking opportunities. Analyze in detail various alternative public uses for ranching lease lands, including wildlife habitat, wildlife viewing and photography, research, recreation, campgrounds, educational facilities, etc. Discuss reports and complaints of ranchers closing public lands to recreationists, and fences impeding hiking and enjoyment of PRNS and GGNRA by the public. Diversification Fully analyze the damaging environmental impacts of permitting proposed diversification schemes, such as new kinds of exotic livestock, small animals, row crops, dairy processing, on-site slaughtering, hotel operations, and other proposed commercial activities within PRNS. Fully analyze the impacts of allowing row crops, including reduced habitat for wildlife, creating conflicts with native birds and predators that may feed on them, requiring additional fencing, and use of water. Fully analyze the impacts of allowing chickens, turkeys, ducks, geese, sheep, goats, rabbits and similar small animals, including creating conflicts with native predators. Fully analyze what new structures and infrastructure would be required for different diversification schemes. Discuss how various diversification schemes would negatively impact park wildlife. Discuss whether allowing any additional private economic enterprises or activities would conflict with the purposes of PRNS. Identify what diversification operations have already been approved, or are being illegally conducted in lease areas, including farm stay operations, chickens, and any agricultural activities other than cattle grazing. Discuss how various diversification uses would limit or prevent public access. Residential Facilities and Impacts Disclose all commercial and residential structures in the grazing lease areas, including primary residences, employee housing, barns, etc. Discuss who pays for them and how much. Disclose under what laws and regulations the NPS authorizes year-round residential facilities for ranchers and their employees in addition to grazing. Disclose and analyze the environmental impacts and public costs of infrastructure/utilities that accompany the ranching, including septic tanks, wells, waste disposal, parking lots, electricity, fences, water developments, roads, elk management, environmental mitigation, etc. What residential facility upkeep costs are the Park Service responsible for in the lease areas - roofs, plumbing, painting, renovations, septic tank pumping, etc.? Does the Park Service inspect the residential facilities or otherwise ensure the ranchers are not harming these public buildings? How many people live at all the ranches? How many annual visitors are there to the ranches? What are the greenhouse gas and other impacts? Are off-road vehicles allowed on ranch lease areas? Do ranchers store gasoline for equipment? Are there spills? Lease Enforcement Problems Discuss concerns and evidence of grazing lease violations, such as illegal subleasing, overstocking, shooting or poaching wildlife, or blocking public access. Evaluate and discuss dumping of trash, including barbed wire, and improper disposal of livestock carcasses in the lease areas. Evaluate and discuss the impacts on wildlife. How does the NPS ensure compliance with lease conditions?(Has the NPS ever taken any enforcement action for lease violations? Discuss the economic benefits to the local economy from park visitors and wildlife viewing. Contrast income from recreation versus income from park grazing leases, per the 2006 NPS Economic Impacts Study. Evaluate the true economic costs of grazing leases, including: below-market grazing rates; subsidized housing; NPS funded improvements to ranches; NPS funded mitigation for ranch environmental impacts; costs of monitoring, compliance and enforcement of lease conditions; damage to roads and other infrastructure; etc. How does the NPS determine Fair Market Value of grazing and housing leases? Is this consistent with federal policy and with other federal lands? How will Fair Market Value of reassessed grazing and housing leases affect the viability of commercial ranching and dairying in the planning area? Compare the PRNS and GGNRA grazing lease and housing rental rates to equivalent grazing land rates and rents outside the park. Quantify the annual loss to PRNS from providing below-market leases for grazing and rent. Quantify the annual loss to PRNS from ranching infrastructure improvements (such as fencing, road maintenance, erosion control, habitat restoration, monitoring, compliance, etc.). Analyze and disclose how much staff time NPS spends

on monitoring, compliance, working with ranchers on BMPs, and permitting in the lease areas, and the estimated annual costs. Aesthetics Analyze and disclose the aesthetic impacts to park visitors from ranching and dairying operations, including creating an industrialized environment, ranch vehicles, trash, fencing, damaged roads, lighting, cattle manure, etc. Historic Resources Analyze and disclose how ranching affects pre-ranching archaeological resources. Explore opportunities to protect and enhance pre-ranching cultural resources within the planning area. Evaluate how current historic buildings may be used to promote pre-ranching cultural resources for public education, use and enjoyment. Analyze and disclose DOI guidance and all NPS strategies for maintaining the character and integrity of historic districts and historic buildings. Analyze and disclose the current and projected taxpayer burden of restoration of buildings used by commercial leaseholders. Alternative A: Continue Current Management (No Action) The EIS should discuss the adequacy and inadequacy of protection of natural resources under current lease operations (including ranching impacts on water quality, soils, wetlands, riparian vegetation, endangered species, and invasive plants); detail the history of compliance or lack of compliance with current and past grazing lease conditions; and discuss NPS enforcement and lack of enforcement regarding grazing lease violations. The EIS should evaluate trends in precipitation and projected drought conditions to determine the viability of adequate feed for sustained commercial beef and dairy operations. The EIS should explain where and how large these buffers would be, what resources they would be protecting, and what ranching activities would be allowed in these buffer areas. The EIS should also explain the methodology for determining appropriate buffer areas. The EIS should also discuss the ranching practice of spreading waste manure from dairy ranches (likely infected with Johnes disease) on rangelands, the risk this poses of spreading the disease to elk and other native wildlife, and current NPS research on mitigation measures. Alternative B: Continued Ranching and Management of the Drakes Beach Tule Elk Herd (NPS Proposed Action) Under this alternative, the NPS would explore opportunities for ranch operational flexibility and diversification. Diversification is a euphemism for allowing ranchers to introduce new livestock animals into the park, such as chickens, goats and sheep, or to grow agricultural crops. This would inevitably lead to conflicts with the parks native wildlife, and could lead to killing of birds and native predators. No diversification should be allowed under any circumstances. The EIS must fully analyze and disclose which new agricultural uses are being considered, where they would occur, the potential for conflicts with native wildlife, and how the NPS and ranchers would address those conflicts. The EIS should evaluate trends in precipitation and projected drought conditions to determine the viability of adequate feed for sustained commercial beef and dairy operations. The EIS should explain how defining native elk as problem animals is consistent with maximum protection, restoration, and preservation of the natural environment. The EIS should disclose what management actions the NPS will take if new elk herds establish from existing herds. The alternative proposes arbitrary minimum and maximum population sizes for the Drakes Beach elk herd of 100-160 elk. The NPS falsely claims this is based on guidance from the California Department of Fish and Wildlifes 2017 Draft Elk Conservation and Management Plan.¹ Yet this CDFW draft plan contains no such guidance on maximum or minimum population size. In fact, regarding minimum population viability 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 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. The EIS should explain the science behind the arbitrary 100-160 Drakes Beach elk goal, and explain why a maximum population threshold is needed for the Drakes Beach elk herd. Discuss whether there is any ecological justification for limiting the size of this elk herd The EIS should also explain the methodology for determining appropriate buffer areas to protect resources within the planning area. The EIS should disclose where native grassland exists in the planning area, and discuss all cattle grazing impacts on native vegetation, negative and positive. Alternative C: Continued Ranching and Removal of the Drakes Beach Tule Elk Herd The EIS should discuss whether removing the Drakes Beach elk herd is consistent with the maximum protection, restoration, and preservation of the natural environment of PRNS. The EIS should disclose where translocated elk would be moved to and for what ecological benefit. The EIS should disclose what will happen when Limantour herd elk move into the former Drakes Beach herd area. Alternative D: Reduced Ranching and Management of the Drakes Beach Tule Elk Herd In reducing ranching operations, the NPS must be guided by its management policies to prevent impairment of natural resources, and eliminate the most environmentally harmful ranches and ranching activities. The EIS should analyze and prioritize ranch lands for closure based on: leaseholder history of non-compliance with lease conditions; ongoing problems with overgrazing; the presence of endangered, threatened or

sensitive species; the presence of tule elk; conflicts with recreational access; significant water pollution; impact on wilderness areas, such as ranch lease areas that drain to Drakes Estero; and other environmental factors. The EIS should discuss the NPS proposal to close the ranches that drain to Drakes Estero, as part of the abandoned 2010 draft GMP update for PRNS. The NPS evaluated an alternative which would rezone the Drakes Estero watershed to Natural Zone and the lands within it grazed by cattle would have been closed to ranching over time. The EIS should discuss the rationale for proposing to close these ranches, which the NPS described in 2010 as the primary location for sensitive and unique resources in PRNS. Alternative E: No Dairy Ranching and Limited Management of the Drakes Beach Tule Elk Herd The EIS should discuss the rationale for allowing dairy leases to convert to beef cattle, rather than allowing the dairy leases to expire and converting and restoring former dairy lease lands for the purposes of protecting natural resources and providing public access. Discuss what the impacts would be in terms of reduction or increase in AUMs, RDMs and forage from switching from dairy to beef cattle. The EIS should disclose the positive environmental impacts from closure of the dairy ranches, including: eliminating some of the most concentrated water pollution sources; removing many of the industrial sized agricultural facilities in the park; improved public access; and reduction of greenhouse gasses Alternative F: No Ranching and Expansion of Tule Elk in the Planning Area The EIS should discuss the environmental benefits of cessation of ranching, specifically regarding water quality, soils, wetlands, riparian vegetation, endangered species, and invasive plants. RRI would support the conversion of former ranch areas and their associated facilities for public not-for-profit education, research, outdoor experiential activities, and other public recreation and visitor opportunities. The EIS should evaluate the potential for rebuilding large 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. Could such elk communities be counted on to graze the coastal range in much the same way prescribed grazing regimes would?

Ultimately, the park users and the American people deserve a robust cost-benefit analysis of each of the proposed alternatives, RRI encourages the NPS at PRNS to deploy one for the draft GMPA/EIS to aid park users and the American people assess the social, environmental, and economic consequences of the proposed policy. The National Park Service and Point Reyes National Seashore are poised to provide the American people with a vision for the sustainable future.

RRI looks forward to our continued participation in this planning process.

Chance Cutrano Director, Special Projects and Strategic Initiatives Resource Renewal Institute
#1339

Name: Powers, Kate

Correspondence: Thank you this opportunity to make scoping comments on the Draft Environmental Impact Statement of the General Management Plan Amendment.

I request that the Draft EIS analyze impacts from each alternative with an equal level of detail and that it:

- Describe all impacts to the various rangeland ecosystems in the Seashore from different species of ungulates present, wild and domestic (elk, deer, cattle), and their management, from their specific grazing patterns and behaviors, diets, and lifecycles. Identify current and future mitigations of impacts to the rangelands.
- Describe impacts to other species including birds, reptiles, amphibians, and other mammals from different species of ungulates, wild and domestic, and their management
- Describe impacts from different ungulate species, wild and domestic, and their management on creeks and water flowing through watersheds in the Seashore including impacts to water quality flowing into bays and the Pacific Ocean. Identify current and future monitoring and mitigations of impacts.
- Describe impacts of the different ungulate species, wild and domestic, and their management on emissions of greenhouse gases and on total carbon footprints. Identify current and future mitigations of greenhouse gas emissions.
- Describe impacts of different ungulate species, wild and domestic, and their management on sequestering of carbon emissions on rangelands.
- Describe impacts from and management approaches to infectious diseases among different species of ungulates in the Seashore, wild and domestic, including Johne's Disease.
- Describe all impacts of current and future intended recreational uses of the Seashore on the various ecosystems, natural resources and landscapes in the Park.

#1340

Name: Edlin, Ted

Correspondence: I am a 40+ year resident of Inverness Park and observed the demolition of a dozen or more ranch houses at Lemantour beach soon after the creation on the park. They press recently reported that the Park has demolished more than 150 dwellings since 1977. That is NOT being a good neighbor. A modest remedy would be to let ranchers provide housing for their workers so they didn't have to drive 50 miles round trip daily to earn a barely sustainable living. Local housing would also help the local economy and stop the decline in the school population. Workers should be allowed to cultivate their own vegetable gardens - with the obvious benefit of eating a healthier diet. They would also make local businesses less dependent on tourism. The Park should adopt a policy of NOT demolishing any more housing as it acquires more land. The park should, in conjunction with the State and County, develop a plan for residents to access their homes as sea level rise continues. The flooding of Bear Valley Rd, Sir Francis Drake At White House Pool will strand all residents and ranchers. A high road route needs to be created and implemented over the next decades. The topic of Elk needs to be resolved once and for all. Ranch grazing land should not be accessible to the Elk population. It should not be beyond the Park's ability to contain the Elk. Electric fencing is effective. I have had some experience with electric fencing in Hawaii to keep Feral pigs out of crop land. It worked fine except when the jungle encroached the cleared land and dropped branches on the fence and shorted it out. This should not be a problem where the ranch land has few trees. Stop the ongoing war with the ranchers. The future of ranching should be assured by granting ranchers long enough leases (greater than 20 years). This will allow the ranchers access to capital to make long term improvements. Leases should be for 50 years with 20 year notices of policy changes. This would solve the acquisition of capital problem.

Ranchers should be allowed to build housing for family members who want to carry on the family ranching tradition. Lastly but not least the current administration is allowing mining and drilling in National Monuments. The least the Park could do is to restore Oyster farming in the Estuary. If done responsibly it will keep the water clean and provide for local employment and satisfy the demand for Oysters in California and beyond. It will help restore some respect for the Park Service. Thank you for consideration of these changes. Feel free to contact me to discuss these suggestions. PS. The last few years there has been a noticeable decline in the deer population in my back yard in Inverness Park. Is that due to Park activity?

#1341

Name: Daley, Dave

Correspondence: Dear Superintendent Muldoon: The California Cattlemen's Association, Public Lands Council, National Cattlemen's Beef Association, California Farm Bureau Federation, and Western United Dairymen appreciate the opportunity to provide scoping comments on the Environmental Impact Statement (EIS) for the General Management Plan (GMP) underway for the Point Reyes National Seashore (PRNS) and the north district of the Golden Gate National Recreation Area (GGNRA). The California Cattlemen's Association (CCA) represents more than 1,700 cattle ranchers throughout the state of California, including many of the ranchers at PRNS and GGNRA. 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. 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 California Farm Bureau Federation (CFBF) is a non-governmental, 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 agricultural, associate and collegiate members in 56 counties. Western United Dairymen (WUD) is the largest dairy trade association in California. The Association's mission is to "earnestly and conscientiously work to promote sound legislative and administrative policies and programs for the profitability of the dairy industry and welfare of the consumer" and encompasses dairy producers from all corners of the state, including the 6 dairies located within the PRNS and GGNRA. While the GMP amendment is primarily important to our organizations because of its immediate impact upon the ranches and dairies in the PRNS and GGNRA, we are also concerned

that management decisions by the National Park Service (NPS) here are likely to reverberate throughout Marin County and even throughout the United States. The GMP amendment presents an extraordinary opportunity to preserve the social, environmental, and economic balance that has made Point Reyes such a remarkable resource. We recognize that finding the best way to preserve this balance is challenging, and we appreciate the NPS' thoughtful consideration of these comments. In the following comments, we identify issues, provide information and offer perspectives that will assist the NPS in developing a thorough EIS that will support adoption of an alternative that will support the sustainability of the ranches and dairies. The key elements of such an alternative are providing for long-term leases, effectively separating tule elk from the agricultural properties, and providing for adequate operational flexibility for ranches and dairies. For the reasons and in the manner described below, these elements should be considered in a modification of the alternatives identified in the Notice of Intent (NOI). We note that these elements are described in "The Community Alternative: Continued Ranching and Manage Elk for Effective Separation from Ranches," which we encourage the NPS to analyze as one alternative in the EIS. Below, we identify various considerations that NPS should fully explore in the EIS and outline the elements and policy considerations favoring a modified GMP amendment alternative. Following that is an analysis of the required Settlement Alternatives, including issues that should be considered and reasons these alternatives should ultimately be disfavored in the GMP amendment.

THE PURPOSE AND NEED SHOULD RECOGNIZE THE IMPORTANCE OF RANCHES AND DAIRIES We encourage the NPS to include in the purpose and need statements recognition of the importance of the agrarian character of the PRNS provided by the ranches and dairies, which Congress sought to preserve when the seashore was established. Although the EIS must consider a range of alternatives, it is important that the purpose and need acknowledge the Congressional intent given the importance of these operations to the environmental, economic, and social fabric of the area.

ELEMENTS COMMON TO ALL ACTION ALTERNATIVES SHOULD NOT UNDULY LIMIT MANAGEMENT The conservation framework, while conceptually a useful tool for providing operational flexibility, should be modified to avoid inadvertently causing the loss of the very resources the NPS is trying to protect. Because PRNS is, and has been for a very long time, a managed environment, altering the current management is likely to cause a loss of any existing desired conditions. The idea that a more natural management regime will result in a more natural condition is not always true, particularly in managed systems with human interaction like PRNS. This is what happened with initial efforts to protect vernal pools, as well as California red-legged frogs and California tiger salamanders. To protect these resources and species from the impacts of grazing, key vernal pools and pond habitats were fenced to exclude livestock. But the effect was the opposite of what was intended. 2 Instead of improving, conditions worsened. It turned out that the disturbance of grazing was important to the condition of the resource. A similar situation occurred with forest management. In response to the logging practices of the mid Twentieth Century, active management was largely halted on public forestland based on the idea that natural management will result in natural conditions. But instead of natural conditions, in many areas this has resulted in very unhealthy forests. Because the forest system was already managed, halting management didn't result in the desired condition, but actually resulted in a new set of major challenges - increased fire risk and evapotranspiration, reduced habitat and tree health. To avoid these types of errors, we encourage the NPS to consider all management practices on all Land Management Units (LMUs) that will effectively and efficiently make progress toward the desired conditions. As described in the available materials, the range LMUs would comprise nearly 70% of the planning area and would have very limited management activities. But because PRNS has been a managed system for a very long time, additional management may be necessary in all LMU s in order to work toward the desired conditions and maintain the agricultural viability of the ranches and dairies.

ELK MANAGEMENT SHOULD Focus ON EFFECTIVE SEPARATION FROM THE AG RI CULTURAL PROPERTIES The NPS should focus its analysis on alternatives that effectively separate elk from the agricultural properties. Without appropriate management, tule elk threaten the ecological and agricultural sustainability of the agricultural properties. As explained in CCA's 2014 comments addressing the now-abandoned PRNS Ranch Comprehensive Management Plan: The destruction tule elk have caused on PRNS ranches is devastating and well-documented. In particular, the elk regularly compete with cattle for forage, and have been known to damage fences and other ranch property during such incursions. The Limantour elk make daily incursions upon the Home Ranch and graze grasslands which are leased by NPS for cattle grazing As elk eat grass intended for cattle forage, ranchers have no option but to purchase supplemental feed to sustain their cattle. This can be extremely costly for the ranchers For those ranches certified organic, these incursions can also threaten their organic status. This is particularly troubling given the increased time, effort, and expense incurred by those ranchers who choose to serve their customers by certifying organic. Finally, tule elk impact the grazing standards for pernnittees

at PRNS. Through no fault of their own, and regardless of livestock management practices, ranchers may exceed the PRNS grazing standard of 1 200lbs[/acre] of residual dry matter left on pastures prior to the rainy season when elk routinely graze the areas. To ensure that historical ranching remains viable within the pastoral zone, as Congress intended, we urge NPS to take immediate action to remove elk from the pastoral zone and to ensure that elk do not return to the pastoral zone. This may involve bolstering fence lines separating the [Limantour free-range herd] from existing ranches within PRNS.¹ In order to address these issues, in addition to the alternative identified in the NOI that anticipates removal of the Drakes Beach tule elk herd, the NPS should consider alternatives that include management of the Limantour free range herd. It is not enough that "NPS will evaluate management of tule elk from the Limantour free range herd if they affect ranchlands."² Tule elk have affected rangelands and are affecting rangelands, and thus the NPS must use all appropriate methods to manage the Limantour elk to keep them from straying into the agricultural properties. It is also 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 that 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. Such management would avoid future losses of tule elk such as that experienced from 2014-2015 during California's historic drought.

LEASE DURATION: THE GMP AMENDMENT SHOULD ENSURE 20-YEAR (OR LONGER) LEASES FOR RANCHERS Our organizations are pleased that under the proposed alternative NPS would "[i]ssue agricultural lease/permits with 20-year terms to existing ranch families to continue beef and dairy operations" and that those permits "would include opportunities for operational flexibility and diversification." Any GMP amendment ultimately finalized by NPS should prioritize long-term leases for ranchers at PRNS. Cattle ranchers, including those at PRNS, strive to be good stewards of the land, water, and wildlife resources. However, 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 permits, ranchers are hesitant to invest their own capital in ranch improvements, as there is no assurance that they will see returns on those investments. Long-term leases will enable ranchers to obtain financing and see returns on their own investments, incentivizing good stewardship practices and benefitting both the rancher and the unique environment of the PRNS. The solution to environmental concerns at PRNS is not to eliminate or reduce ranching, but to provide the Seashore's ranchers with operational security that will allow them to invest in improvements benefitting the ranch, the land, the water, and the Seashore's unique wildlife. To advance this goal, we encourage the NPS to consider a rolling contract similar to that used in California's Williamson Act as a means of furthering sustainability.³

ANALYSIS OF ALTERNATIVES REQUIRED BY THE SETTLEMENT AGREEMENT While our organizations acknowledge that the NPS is required by a settlement agreement to consider the "No Ranching," "No Dairy Ranching," and "Reduced Ranching" alternatives, examination of the following issues in the EIS will reveal why these alternatives should be rejected. As explained in greater detail below, all three alternatives are: 1) inconsistent with the Point Reyes National Seashore Enabling Act and the Golden Gate National Recreation Area Enabling Act, and 2) inconsistent with the Coastal Zone Management Act of 1972. Not only should these alternatives be rejected as a matter of law, but the devastating economic, social, and environmental impacts to the region demonstrate that these alternatives should be rejected as a matter of good policy. Although the settlement agreements require the NPS to analyze alternatives that reduce agricultural production, when considering alternatives that reduce ranching and dairying, the EIS must analyze the environmental effects of that loss of agricultural production.

THE SETTLEMENT AGREEMENT ALTERNATIVES ARE CONTRARY TO LAWS GOVERNING THE PRNS 1) Alternatives required by the Settlement Agreement are inconsistent with PRNS and GGNRA Enabling Legislation The Point Reyes National Seashore Enabling Act states that: [PRNS] shall be administered by the Secretary [of the Interior] 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 area⁴ Likewise, the Golden Gate National Recreation Area Enabling Act states that the GGNRA was established "[i]n order to preserve ... outstanding natural, historic, scenic, and recreational values."⁵ Continuance of dairy and beef cattle ranching at the PRNS and GGNRA is essential to historic preservation of the PRNS and GGNRA because ranching is part of the very fabric of the area. Cattle were grazed at Point Reyes as early as 1820, when the longhorn cattle of a Spanish Franciscan Mission at

San Rafael roamed the peninsula.⁶ When the missions were dismantled, ownership of land was established by Mexican land grants, and the grantees of these ranchos continued to graze cattle on the peninsula (for instance, former Mexican Army corporal Rafael Garcia grazed 3,000 head of cattle at the peninsula).⁷ After California's acquisition by the United States, many rancheros sold their lands to American entrepreneurs. By the 1930s, ownership had largely stabilized; many of those ranching families continue to ranch at Point Reyes today. Beef cattle and dairy ranching are fundamental to the history of the Point Reyes peninsula, and it is precisely these historic uses that the PRNS and GGNRA enabling acts sought to preserve. Any alternative which eliminates or reduces historic ranching at the PRNS and GGNRA is entirely inconsistent with the laws which paved the way for the creation of the PRNS and GGNRA.

2) Alternatives required by the Settlement Agreement are inconsistent with the Coastal Zone Management Act of 1972. Though federal lands such as the PRNS and GGNRA are excluded from the "coastal zone" under the Coastal Zone Management Act of 1972,⁸ the "federal consistency" provision of the Act nevertheless states 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."⁹ Additionally, National Environmental Policy Act regulations require that an EIS examine "possible conflicts between the proposed action and the objectives of Federal, regional, State, and local... land use plans, policies and controls for the area concerned."¹⁰ As detailed in Unit II of the Marin Local Coastal Program approved by the California Coastal Commission in 1981, II The [California] Coastal Act strongly supports the preservation of agricultural lands in productive agricultural use and strictly controls the conversion of agricultural lands to other uses. Agricultural land uses are given priority over many other[]use[s] in the coastal zone, including visitor-serving development. Because of the Coastal Act's strong support for preserving agricultural lands and the important role which agriculture in the parks plays in Marin's agricultural economy, the LCP recommends that agriculture in the GGNRA and PRNS be encouraged and carefully monitored to avoid adverse impacts on natural resources and public recreation. Where conflicts arise between agriculture and public park uses, they should be resolved so as to protect resources and public safety while still allowing the continuation of the agricultural operation. Regarding existing leases, the LCP recommends that they be reviewed five years prior to expiration for compatibility with park goals, and revised as necessary. To provide greater security to agricultural operations, long-term lease arrangements and automatic lease renewal provisions are recommended if all terms and conditions of a lease are met. Uniform procedures and standards should be established by the National Park Service to deal with all agricultural tenants.

¹² The GMP amendment conducted by NPS is a federal agency activity which effects land use and natural resources within California's coastal zone, and thus must be "consistent to the maximum extent practicable with the enforceable policies of approved State management programs." As demonstrated above, the "No Ranching" alternative, "No Dairy Ranching" alternative, and "Reduced Ranching" alternative would not be "consistent to the maximum extent practicable" with the policies outlined in the Marin Local Coastal Plan approved by the California Coastal Commission because it would not encourage agriculture at GGNRA and PRNS nor continue existing agricultural operations. All three settlement alternatives fail to uphold federal consistency with state-approved coastal management plans in accordance with the Coastal Zone Management Act of 1972. The Draft EIS should fully examine the interrelationship between the settlement agreement alternatives and all local, state, and federal laws and regulations governing the portions of PRNS and GGNRA within the coastal zone.

THE SETTLEMENT AGREEMENT ALTERNATIVES WOULD BE DEVASTATING TO MARIN COUNTY'S ECONOMY, WITH IMPACTS REVERBERATING THROUGHOUT THE STATE OF CALIFORNIA Any examination of the Settlement Agreement alternatives in the EIS must fully weigh the direct and indirect economic impacts that such alternatives would have upon the Seashore, Marin County, and California.¹³ According to the Marin County Board of Supervisors, the ranches at PRNS and GGNRA account for nearly 20% of agricultural production in Marin County, a direct production value of \$20 million. A 2009 analysis by U.C. Cooperative Extension found that ranches at PRNS and GGNRA directly provide 65 jobs, and provide livelihoods for another 25 ranch family members. The presence of these ranches supports local schools, churches, businesses, and community organizations. Should these ranches be "phased out" under the "No Ranching" alternative or be reduced in number under either the "No Dairy Ranching" or "Reduced Ranching" alternatives, Marin County would be deprived of the economic benefits of these ranches, resulting in a loss of 20% of the County's agricultural production and devastating the local businesses that rely on the presence of the ranches and ranchers.

THE SETTLEMENT AGREEMENT ALTERNATIVES WOULD UNDERMINE THE RECENTLY RECOGNIZED HISTORICAL VALUE OF RANCHING AND DAIRYING IN PRNS As explained in the General Management Plan Amendment newsletter, the "significant role the ranches played

within the history of the region has been formally recognized with the listing of the Point Reyes Peninsula Dairy Ranches Historic District and the Olema Valley Dairy Ranches Historic District on the National Register of Historic Places." ¹⁴ Because ranches and dairies are an integral part of the historic cultural makeup of the PRNS, the settlement agreement alternatives would reduce the very history that has rendered them historic in the first place. Consequently, these alternatives should be rejected. CONCLUSION CCA, PLC, NCBA, CFBF, and WUD appreciate the opportunity to provide initial scoping comments in advance of NPS's EIS for the Point Reyes National Seashore GMP amendment, and thank NPS for their efforts. We look forward to continued communication with NPS as it develops its EIS-and ultimately a final GMP amendment-for the Point Reyes National Seashore.

#1342

Name: Patton, Morgan

Correspondence: 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 (Seashore) General Management Plan Amendment (GMPA). Since 1971, EAC has worked to protect and sustain the unique lands, waters, and biodiversity of West Marin. EAC's membership represents 1,000 individuals with 56% of our membership located in Marin County. 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 (GGNRA). Part of that process has included collaborative discussions with a variety of stakeholders to better understand challenges, perspectives, and find common ground on the complicated issues in the GMPA. To this end and through this process, EAC has met with representatives from the Point Reyes National Seashore Ranchers Association, fellow local environmental organizations, and national environmental organizations. EAC is strongly supportive of the public planning process for the GMPA as a way to work collaboratively to find solutions to ensure: transparency in decision-making and public confidence in management of the Seashore; identification of solutions for conflicting national park priorities; protection and preservation of natural resources; restoration of degraded habitats and other park resources; and opportunities for maximum public access to parklands. EAC believes the GMPA must 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. EAC understands the Seashore is utilizing discretionary authority as provided by the Secretary of the Interior¹ and Director of National Parks² to authorize extension of leases for beef and dairy ranches. Through this authority, the Seashore will apply the fundamental purposes of the NPS Organic Act to "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 generations³" and the Seashore's Enabling Legislation, "to save and preserve, for purposes of public recreation, benefit, and inspiration, a portion of the diminishing seashore of the United States that remains undeveloped⁴." EAC's comments are organized based on Alternative 8 and the list of impact topics presented in the GMPA newsletter. The newsletter indicates that under all alternatives, specific impact topics will be analyzed within the Environmental Impact Statement to ensure recommended management strategies will be protective of the natural and cultural resources of the Seashore. In consideration of these topics and Alternative 8, EAC offers the below comments for consideration by NPS: NPS Proposed Action (Alternative 8): Alternative B proposes a list of approaches to address ranching management strategies and regulations, programmatic approaches to best management practices and definition of conservation mapping, management of natural resources that currently conflict with commercial ranching operations, and a program to identify and restore historic and cultural infrastructure. There are, in addition, topics and strategies overlooked in the proposed action that should be included in additional detail. 1. Protection and Preservation of Natural Resources The Seashore is one of the few national parks with active beefranching and dairy operations. This framework provides an opportunity to demonstrate a unique and scientifically based ranch lease arrangement that ensures the protection and preservation of natural and cultural resources and multigenerational environmentally responsible ranching. To accomplish this, the Seashore must clearly outline specific management strategies for beef and dairy operations to support environmentally responsible practices. 1.1. Baseline to Inform Management A baseline must be established against which to evaluate current operations in order to inform several of the proposed NPS management strategies including: operational flexibility, diversification, conservation framework

mapping, environmental impacts, and programmatic review of best management practices. EAC recommends that baseline conditions be those uses specifically described by the 2012 Secretary of the Interior's Memorandum regarding Drakes Bay Oyster Companies, and the 2013 Director of the National Park Service's Delegation of Authority for Point Reyes National Seashore Agricultural Leases Memorandum that authorizes the "issuance of lease/permits for the purpose of grazing cattle and operating beef and dairy ranches, along with agricultural residential uses by the lessees and their immediate families and their employees, and employees' immediate families ... 6" Any variation of uses from this baseline should require evaluation through a public National Environmental Policy Act (NEPA) process and be balanced with a conservation framework or conservation ranch plan.

1.2. Long-term Permits/Leases The GMPA should provide clearly defined regulations and management goals for beef ranching and dairy practices within the Seashore to ensure the protection, restoration, and preservation of natural and cultural resources. Consideration of issuing new permits/leases for beef ranching and dairying within the planning area should include definitions, goals, and management strategies that outline how operations are complementary to the Seashore and how to avoid habitat degradation. In addition, all versions of leases and permits (with appropriate privacy redactions) must be posted so that the public can make properly informed comments during the public GMPA process. EAC understands NPS has discretionary authority to continue to issue leases/permits for ranching and dairying in the Seashore and EAC is supportive of NPS continuing to exercise this authority by issuing long-term leases/permits; but any such leases must be designed to ensure the protection, restoration, and preservation of park resources and be issued only to an existing lease holder. In the situation where an immediate family member is not able or willing to take on a new lease, NPS should prioritize adaptive reuse for the historic district landscapes and structures, with conservation designated as the primary management objective. If NPS believes that all things considered, its management goals can best be met by issuing a lease/permit to a new lease/permit holder, a NEPA evaluation should be conducted to determine if continued ranching at that lease/permit area is compatible with the Seashore's resources or if that area would be better served as a conservation lands. EAC recognizes that over the last 20 years, NPS has issued leases/permits for retired pastoral lands. Those commitments should be honored and future extensions of those leases/permits should be subject to environmental analysis and review to ensure that practices continue to be compatible with park resources. Long-term leases/permits should be determined through a transparent process and ensure ranching practices are compatible with the Seashore's mission to protect natural and cultural resources and are complementary to visitor experiences within the park.

1.3. Conservation Framework EAC NPS proposes a conservation framework, "in order to ensure protection of natural and cultural resources, streamline the permitting process, and provide consistent guidance to ranch operators, a zoning framework of ranch core, pasture, and range will be applied to all action alternatives that include ranching ... 7". EAC understands the conservation framework will be used to guide decision making for new activities and to provide greater operational flexibility for existing activities while protecting park resources. We request precise maps that define conservation areas be made available to the public. EAC has questions concerning the relationship of the conservation framework with a traditional conservation plan for ranches and dairy operations. Conservation plans generally focus on land management objectives, examine natural resource concerns and opportunities for restoration and enhancement, locate areas for protection, restoration, and improvement, review recommendation for conservation systems or individual practices, and weigh alternatives and prioritize economic activities for the ranch 8. The proposed NPS conservation framework is a land-use framework that contains elements of conservation. Conservation should be the highest priority of the framework, with other elements subordinate and complementary to that priority. Areas for Ranching and Dairy operations should be geospatially delineated to show the locations of existing resources like structures, roads, pastures, water sources, creeks, etc. to inform improvement in management practices. Resource buffers are a specific concern, as they are essential to protect sensitive habitats and ensure ecosystem health. EAC prefers the Seashore act proactively to spatially analyze areas to protect unique ecosystem, biodiversity, and cultural sites. How will the conservation framework incorporate the protection of park resources and the needs of rancher's commercial operations? What guidance will NPS utilize to balance these priorities that at times are conflicting? Conservation frameworks should include spatial data to analyze and identify areas that are also vulnerable to changing conditions including rising sea levels, reductions in average rainfall, and increased average temperatures, and locations of federally listed and special status species should be mapped, along with likely changes to those locations under different climate change scenarios. This will ensure appropriate protection of species and habitats, as directed by the 2006 NPS Management policies which direct natural resources to be managed in order to preserve fundamental physical and biological processes. In the cases of special status and endangered species, NPS is legally compelled to protect

habitat, and should proactively protect reasonably foreseeable future habitat areas.

1.4. Conservation Ranch Plans and Best Management Practices Best Management Practices (BMPs) are used to improve commercial operational practices in order to promote the protection of park resources. BMPs should be developed and include measurable outcomes and expectations for operators. These BMPs should be common-sense and practical solutions that allow for operational flexibility and ensure park resources are protected. In short BMPs should be established through a programmatic approach to maximize environmental sustainability of ranches and dairies. EAC is supportive of BMPs that promote the protection of park resources by defining measurable goals and outcomes balanced with the ability for operators to comply with rules and NPS to enforce the permits. Sensitive resources like wetlands, riparian corridors, and estuaries are of particular concern. Water quality and overall health of these habitat areas should be safeguarded and prioritized over any operational practices. In addition, BMPs within the Seashore should strive to be the most environmentally protective in order to demonstrate environmentally sustainable operations occurring within a National Seashore which is currently not characterized exclusively for ranching and dairying. To ensure public confidence, management guidelines, ranch plans, and BMPs should be transparent, appropriate for the operation type and size, and applied in an organized and uniform manner and should be made available to the public.

1.5. Soil Processes, Erosion and Compaction The GMPA should address all of the complexities of soil health and its relationship to water quality, plants and animals within the Seashore. EAC encourages proactive approaches to improving soil health through common-sense solutions that are currently in place in areas outside of the Seashore. This includes addressing pasture management, animal unit counts, water quality, and native plants.

1.6. Pasture Management EAC Pastures and grazing should be managed in accordance with the 2015 Residual Dry Matter Analysis Report that includes adaptive management strategies to understand overall pasture health and grazing patterns. In addition, the Seashore should map current areas where manure is applied to validate compliance with regulations concerning slope and proximity to water sources. Any locations where nutrients may impact water sources should be remapped to remove areas with such impacts. In order to protect rangelands and coastal prairies, what ROM techniques will be applied to ensure accurate measurement of rangelands and prevent overgrazing? What actions will the Seashore take in response to indications of overgrazing?

1.7. Allowable Animal Units Additional consideration of pasture management should include a review of the numbers of animal units allowed for each lease/permit. Currently, dairies generally range from 350-850 in stocking animal units, and beef grazing operations from 5-312 stocking animal units. Many of the leases restrict grazing to specific times of year or include a maximum number of animals that may graze at one time. Assuming the GMPA will update these animal unit totals, what criteria will be used to determine grazable land for the number of animal units within the Seashore based on current environmental carrying capacity for each lease/permit? In addition, the number of animals allowed for grazing should be compatible with the State of California's 40% methane gas reduction goals outlined in Senate Bill 1383.

1.8. Water Quality EAC In order to ensure healthy and balanced habitats and safe clean water for species and visitor access in shoreline areas, the water quality of streams, creeks, wetlands, estuaries and beaches should be subjected to independent research to determine acid-base status, nutrient conditions, and chemical stressors. NPS 2006 Management guidance recommends protection and restoration measures should be considered to improve water quality of natural riparian habitats and preserve natural system components. Currently, the ranches and dairies that discharge into the Tamales Bay Watershed are regulated by permits or conditional waivers issued by the Regional Water Quality Control Board (RWQCB). Dairies and grazing operations that exceed 50 acres are required to complete Ranch Water Quality Plans (RWQP). We request the RWQP documents be made available to the public for review and transparency. For operations not located within the Tamales Bay Watershed and discharging to the Pacific Ocean, what water quality standards are currently being implemented by the Seashore? What processes are currently in place to proactively protect water quality within the Seashore? The beneficial uses of water are protected by the Clean Water Act. Regardless of the operation type or location of the operation (within an impaired watershed), the Seashore is responsible for protecting beneficial uses. To ensure this protection in areas where freshwater discharges into the Pacific Ocean EAC recommends the Seashore implement a standard RWQP and a water sampling program for creeks, seasonal streams, and estuaries, and build a publicly-available data-set to inform management strategies and guide resource allocation for restoration and water quality improvements.

1.9. Operational Flexibility As specified in the 2013, Delegation of Authority Memorandum, by National Park Service Director Jonathan Jarvis: "In order to assure clarity and consistency for all permits, to clarify expectations and commitments, and to allow for operational flexibility inherent to the long-term beef and dairy operations, I direct the park superintendent to review the permit structure to assure that it reflects and protects the interests of ranch operators while meeting NPS responsibilities to protect natural and cultural

resources.⁹ Operational flexibility should allow for environmental improvements for ranches and dairies by simplifying operational processes; however, it must be limited to flexibility in current activities and maintenance and be integrated within the conservation framework. For example, repair of a water line or improving rain gutters to reduce run-off of manure. Under Alternative 8, NPS will explore opportunities for operational flexibility and diversification. EAC understands these terms to be inherently distinct and should not be grouped. Flexibility in managing existing beef and dairy operations is a legitimate and desirable goal of a long-term planning framework. Diversification is new commercial uses outside beef and dairy ranching.

1.10. Diversification EAC is not supportive of diversification, which we define as new commercial land uses outside of cattle ranching and dairying that impact park resources or visitor experience. If NPS is considering authorizing diversification within the planning area, any new uses should be limited to the ranch core, and there must be a separate transparent public process and specific NEPA evaluation for any new proposed uses to identify environmental conflicts and appropriate mitigation to ensure consistency with the purpose for which the Seashore was established. This process allows for comprehensive and thoughtful review of potential conflicts with park resources including predators, water use, impacts on native species, visitor experiences, and cultural resources. Any current permits for diversification including silage production and raising chickens, if a NEPA analysis was not conducted for that use, should require evaluation following the GMPA. This would ensure these practices do not impair resources and allow for mitigation.

1.11. Silage Production The Seashore has recorded observations of more than 490 bird species (more than 50% of North American avian species) and is located along the Pacific Flyway. During the spring migratory bird and nesting season, NPS takes measures to monitor vegetation for nesting and migratory birds prior to any trail maintenance seasonally, but ranchers within the planning area are allowed to mow silage fields without the same requirements. The impacts to migratory and nesting birds need to be considered and mitigated within the Seashore to ensure that resources are not impaired. In addition, there are BMPs that could be implemented for production of silage that reduce environmental harm, including no-till practices, advance bird surveys, adjustments in mowing schedules, etc. Without a review, there is not a way to ensure practices are least environmentally harmful.

1.12. Changing Conditions (Climate Change) Changing environmental conditions, like climate change, will impact park resources in the near future including sea-level rise, average temperature changes, average rainfall totals, and distribution of native and non-native species. These changes will alter the ecology and landscapes of the Seashore in many ways. For example, areas that border coastlines and estuaries will experience flooding and the migration of natural resource boundaries. This includes wilderness areas like Drakes Estero and Abbotts Lagoon that may migrate into the pastoral zone. How will the Seashore manage these changing conditions and adjust the boundaries between the planning area and wilderness areas accordingly? EAC recommends proactive planning in this area to reduce conflicts with pastures and resources in the near future. Adjustments to lease borders based on the existing and future boundary migrations should be addressed in this GMPA process as leases may be issued for up to 20 years. The Seashore should use the best available science to determine impacted areas and spatial mapping to make decisions to protect threatened natural and cultural resources.

1.13. Air Quality and Greenhouse Gas EAC would like to better understand how the Seashore plans to address impending challenges presented by short-lived greenhouse gases (methane) produced in the Seashore. In 2016, California passed SB 1383, adopting regulations to reduce by 2030 methane emissions from livestock and dairy operations by 40% of the 2013 emission levels, with regulator implementation by 2024 (11 years after the GMPA completes). EAC is hopeful the Seashore will consider the methane reduction goals by the State of California in their programmatic review of BPMs and review of animal unit counts. Carbon Farming is a set of management techniques that contribute to reduce greenhouse gas emissions from ranches by employing several techniques to sequester carbon. The most effective carbon farming techniques that yield the longest-term carbon sequestration include restoration of habitat, improving water quality, windbreaks, native plantings, and no-till farming practices. In addition, rotational grazing, no-scrape dairy manure management, and methane digesters are other practices that can be utilized to reduce greenhouse gas emissions from ranches and dairies. Carbon Farming practices within the Seashore should be supported by long-term data sets and scientific standards to ensure that implementation of these practices do not impair the parks resources. For example, compost spreading could harm native vegetation on the coastal prairies by stimulating non-native plants through use of excess nutrients.

1.14. Tule Elk and Associated Habitat EAC 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 are 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 and brings back unsettling memories of the removal of the nonnative axis deer. Any strategies to manage the elk populations should be in the context of managing natural resources like any other resource within the Seashore and not for the benefit of commercial lease holders. EAC believes there is a middle ground concerning areas of conflict with the Drakes Beach tule elk herd, where both elk and cattle may co-exist. Where conflict arises with commercial permit/lease holders, NPS should consider an incentive program that addresses the encroachment of natural resource into areas that have been contractually designated for commercial use. For example, compensation for loss of forage, reduction of cattle herd size, repair of fencing, and current market value for loss of milk production due to encroachment of elk. To minimize conflict, adjustment of boundaries, incentives for ranchers, and fencing the cattle from the elk are all non-lethal options that can be explored. A diverse sets of management tools can be utilized that do not involve lethally removing the herds. EAC is not supportive of any management of the tule elk herds that involves lethal removal. Long-term leases and overall BMPs should strive to reduce conflicts with the tule elk to find a balanced way to accommodate the presence of both cattle and elk. The Phillip Burton Wilderness area should not be manipulated as part of any management strategy, absolutely no structures should be authorized in the wilderness areas. 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 strategy to balance and accommodate the presence of elk and cattle.

1.15. Non-Native, Invasive, and Noxious Plants Protection of the native plants within the Seashore must be a priority within the GMPA planning area. The conservation framework should provide spatial mapping of native plants and identify appropriate habitats for restoration. In particular, protecting the natural habitat of the coastal prairie and grasses is essential and part of the Seashore's unique character. EAC recommends that leases that have a border with private property have prevention management practices in place to prevent encroachment of non-native and invasive species that deplete habitat for native species and forage in the planning area. Some examples of invasive plants of particular concern to ranchers and the Seashore include woolly distaff thistle, purple star thistle, and gorse. Invasive species may be introduced into an ecosystem through infested soil, animal fur, and imported feed. Forage and mulch products may contain seed or reproductive parts from nonnegative, invasive, and noxious weeds. EAC would prefer that programmatic BMPs include a requirement for any lease holder that imports hay, hay cubes, straw, grain, and/or other crop mulch products into the Seashore to use certified "weed free" products that meet the standards of the North American Weed Management Association. This method is successfully implemented in the Deschutes National Forest managed by the USDA in order to prevent degradation of ecosystem health.

1.16. Pesticides, Chemicals, and Integrated Pest Management The GMPA should require a permit/lease condition mandating disclosure of the chemical types, storage techniques, and uses for pesticides, antibiotics, insecticides, herbicides, etc. to prevent these toxins from being released into the environment through improper storage, in the event of a natural disaster, or inadvertent applications. In addition, Integrated Pest Management (IPM) plans should be developed by the Seashore and distributed to the lease/permit holders for implementation. Pesticides that have the potential to impact other species should not be applied under any conditions, for instance, rodenticides that would harm other species. For lease holders that manage weeds in the Seashore the GMPA must include the data on the current uses and impacts of pesticides, chemicals, herbicides, and mowing.

2. Restoration of Degraded Habitats The GMPA and conservation framework must prioritize habitat restoration. Many of concerns over continued ranching and dairying within the Seashore center around degraded and impaired habitat. Protecting water quality and avoiding erosion and native plant and species impacts should be prioritized to ensure that ranching operations are meeting the highest possible environmental compatibility standards.

2.1. Prioritizing Restoration Activities The current proposal by NPS is not clear on the mechanism or process of habitat restoration. Through discussions with NPS staff, EAC understands there is a database that identifies potential projects and tracks completed projects. EAC would like this document to be made publicly available (with appropriate redaction) for the maximum amount of public transparency concerning this important topic so that the public is better able to understand and potentially partner with the Seashore to improve habitat. Within the conservation framework and programmatic BMPs, NPS should consider habitat restoration flexibly in order to improve efficiency, funding, and third-party partnerships to identify and complete restoration projects within a year. EAC understands that some ranchers are not aware that funding is available for conservation related projects that could improve not only habitat within the Seashore but economic efficiency in their operations. The conservation framework should proactively identify areas where improvements may be made and create pathways for conservation and restoration projects to be completed within a two-year

timeframe. 2.2. Water Quality Improvements and Data EAC Over the last two years there have been reported concerns over water quality within the Seashore and not enough data being collected by NPS or third-party partners to ensure that Clean Water Act standards are being achieved. EAC understands that many of the beef and dairies are operating under RWQCB permits or conditional waivers; however, not all operations hold permits and at times in the past there have been low overall compliance rates and RWQB staffing issues. Ultimately, NPS is responsible for protecting beneficial uses as required by the Clean Water Act. EAC would like NPS to prioritize and increase resources for additional water quality sampling in all creeks and estuaries within the planning area boundaries to better inform management strategies, water quality goals, and ensure compliance with the Clean Water Act. 3. Public Access All the alternatives presented by NPS include language to improve visitor access to the planning area through improved hiking trails, biking, equestrian access, and camping. This would create new opportunities for visitors to experience different areas of the Seashore. EAC is supportive of appropriate increases of public access in currently disturbed areas to safeguard park resources and respect lease/permit holder pasture use. 3.1. Visitor Experience Diversification Any proposals to diversify visitor experiences for major events, farm stays, or tours, should be managed by the Seashore or by an authorized concessioner. Individual lease holders should not have the authority to permit special events, farm stays, tours, or visitor experiences without complying with NPS Concessioner standards. Currently, any concessioners providing visitor experiences within NPS are subject to Concessioner standards to meet NPS hospitality standards that include program standards, environmental management, risk management, public health programs, and are rated annually to ensure those standards are being achieved 13. 3.2. Bike Trails EAC is supportive of creating connections for existing bike trails and loops within the planning area. However, new trails that would traverse through pastures could create erosion, negative encounters with cattle, and further congest the narrow roadways. Any plans for placement of new biking trails should require a NEPA evaluation and extensive public input. 3.3. Trail Improvements EAC is supportive of improving trails within the planning area to allow additional access for visitors. However, the process of creating trails and access points needs to include public education and new infrastructure to reduce public safety risks, protection of cattle, and ensure that visitors respect the homes of lease/permit holders. For example, creation of new access points in the planning area would allow for visitors to access the Pacific Ocean by walking through pastures. If these are developed, EAC recommends installing "c" style gates that avoid cattle escaping through an open gate and creating a public safety risk and difficulty for ranchers. In addition, public information and materials should be posted at the locations that indicate appropriate etiquette when near cattle, not to enter the ranch core, and to not leave trash or waste behind. Increased signage, interpretative materials, and maps will help the public understand how to appropriately navigate through the planning area respecting both the natural resources and the need of the lease/permit holders. 3.4. Trash & Visitor Waste The Seashore welcomes more than 2.5 million visitors per year 14 and ensuring appropriate disposal of trash and human waste are critical issues to protect park resources. With the creation of new trails, what plans does the Seashore have to proactively handle the new amount of trash and waste that would generate? How will the Seashore ensure that there is appropriate advance education about the services of the Seashore? How will the Seashore protect park resources, including historic, cultural, and natural resources with increased visitation in areas? In addition, California Senate Bill 1383, intended to regulate short-lived greenhouse gases, is regulating the statewide disposal of organic waste to reduce methane levels. Solid wastes are defined as materials from living organisms and their metabolic waste products that include food, green waste, landscape, wood, lumber, fibers, biosolids, digestate and sludges. The implementation of this law will require a 50% reduction in the level of statewide disposal of organic waste to landfills by 2020 and 75% reduction by 2025¹⁵. If the Seashore's trash is collected and distributed to a California based landfill, organic waste and recycling efforts will require improvements to ensure maximum rates of recycling and composting with limited organic waste disposal. 4. Enforcement The GMPA provides an opportunity to standardize practices through a programmatic approach that will be protective of all park resources (natural, historic, and cultural). To ensure the success of the GMPA, appropriate resources need to be allocated to implement this essential protection. Currently, there are only two range managers for 28,000 acres of ranches and dairies. Ideally, there would be additional staff assigned to assist with managing the ranches and ensuing lease compliance. In order to ensure maximum success and adoption by ranchers, NPS staff should be able to create a partnership with the ranchers to assist with standardized regulatory compliance paperwork, identifying opportunities for seeking grants and funding for conservation projects, and enforcing terms and conditions of leases. These partnership models work very well for land conservation organizations. Conclusion Thank you for this opportunity to present comments on the GMPA. EAC looks forward to actively participating in the GMPA process to ensure the protection, restoration, and preservation of park resources using ranch leases

that ensure multi-generational, environmentally sustainable ranching that is complementary to the natural resources and visitor experiences within the park. Specifically, impacts to water quality, erosion, native plant and species must have the highest priority to ensure that park management achieves the greatest possible level of natural resource protection.

#1343

Name: Grossi, Richard and Jackie

Correspondence: Dear Superintendent Muldoon, 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 Environmental Impact Statement (GMPA or EIS). This comment letter is intended to augment the scoping letter sent by the Point Reyes Seashore Ranchers Association by providing more detail on some of the important topics that this EIS will evaluate. We look forward to working with PRNS and the EIS team as it goes through this process. Sincerely, PRNS and GGNRA Family Ranchers

Ranching and farming families (ranchers) have been the stewards of the beautiful lands and waters of the Point Reyes peninsula and surrounding rangelands for many generations. It is generally recognized that because of the careful management by these families, these cultural and natural resources are preserved. As ranchers know well, we must take very good care of the land we love so that it will remain productive for future generations. In the 1950s and 1960s, Congress recognized that this land and water preserved by these enduring, committed families should be protected into the future--not protected from the long-standing land stewards and their historic businesses, but protected from new development. Congress created the Point Reyes National Seashore (PRNS or seashore) to protect not only the natural resources, but also the agriculture, mariculture and fisheries that had shaped the landscapes for the previous century. The relationship to the land of the historic families who had been caring for the land for previous generations was also to be protected. Ranchers provide several important environmental, educational and economic benefits to the area. Ranchers have had most of the agricultural land within the seashore certified organic. Ranchers work closely with the Marin County Resource Conservation District (MRCD or RCD) and the Natural Resources Conservation Service (NRCS) to adopt new conservation practices and implement on the ground projects to protect and improve natural resources. Most of these beneficial projects come by choice, and, oftentimes at financial expense to the historic rancher or farmer. Our farming families also provide exceptional educational opportunities. Ranchers partner with other organizations and agencies to help inform the public about the benefits of family farming. Ranchers in the seashore produce over 20% of Marin County's agricultural products. The land in the Olema Valley and Point Reyes Historic Ranch Districts constitutes approximately 25% of the land available for agriculture in Marin County today. The ranchers within the project area provide a significant number of jobs as well as affordable housing for their employees. The milk, beef and other farm products flowing into our local region provide more economic opportunities for the region through distribution, retail and restaurants featuring local farm products. It is important that the Park Service emphasize in the EIS that people who value and eat quality beef, dairy and other farm products understand that historic and continued ranching in the seashore allows the production of grass feed beef, Straus and Clover Dairy products, heritage turkeys and more, while livestock, wildlife, and millions of visitors share the seashore. The great cheese, actually made from cow's milk, is enjoyed by legions in our regional foodshed and beyond and depends on continued animal agriculture within the seashore boundaries. These high quality, healthy, meat and dairy foods do not grow in the package purchased at the grocery store or farmers market. Farming and ranching in the seashore provides sensibly scaled models of animal agriculture as viable alternatives to the industrial models now dominating much of the country and world. Halting the continued grazing of livestock that convert naturally occurring cellulosic material such as renewable grass and forbs to wholesome food would be an opportunity lost. Those worried about elk and the agricultural footprint on the Seashore do not fully connect the dots of where their food comes from and how it was carefully produced. Thoughtful food purchases National Park Service in the EIS needs to provide this context to explain why historic ranches should be allowed to continue as an important source of high quality food and why it is important to manage elk in other locations within the seashore separated from agricultural property." Over the past 50 years, since the creation of PRNS, National Park Service (NPS) managers and staff have continually come and gone. Each time new NPS staff arrive at PRNS to regulate the ranching and farming activities, the seashore ranchers provide the necessary education

and background for them to begin to understand the historic operations. Only on very rare occasions have we ranchers seen any NPS staff with any background or education in agriculture - and we have seen hundreds of NPS officials and employees pass through PRNS. Ranchers also provide continuous education opportunities to PRNS staff. Regularly, PRNS hires "range specialists" to work directly with ranchers. These new employees are oftentimes young and inexperienced. Ranchers spend an enormous amount of time working with each new employee to show them the ranch resources, the activities and the stewardship. The PRNS employees gain important technical and practical experience that can help them throughout their careers. For longer than anyone at the NPS, the seashore ranchers have known the seashore's history, and have known and cared for both the natural resources and the local community and the people in the county we serve. The current staff at PRNS, together with the contractors they have hired and the experts with whom the PRNS will consult with during this EIS should listen carefully and give special importance to the comments by the most experienced PRNS land managers, the ranchers at Point Reyes. This scoping letter has been written by the historic ranchers with collaborative conservation in mind. Ranchers have taken this EIS very seriously and ranchers are clearly the most experienced and most affected stakeholders in this narrowly focused GMP A EIS process. Ranchers have had many meetings over the past month to work on our scoping comments. We have listened very carefully not only to ourselves, but to members of the local community. This letter reflects hundreds of suggestions and edits from the affected ranchers and community stakeholders. Many ranchers were engaged in the development of these scoping comments. This letter also incorporates facts and information from consultants, including lawyers, historians, NEPA experts, scientists and other federal, state and local resource management agencies. Ranchers plan to work with PRNS to achieve a relationship that protects both the ranchers' livelihoods as well as the natural resources. Ranchers understand that these goals are not mutually exclusive, but, in the case of the planning area, both are required to achieve either goal. PRNS is a unit of the national park system and PRNS is a "National Seashore", not a "National Park." PRNS asks that all EIS documents, publications and communications be corrected to reflect this fact. Currently, there are many references to "park" or "park resources." These should be changed to "seashore" or "seashore resources." This error, if not corrected, could cause the public and consultants to apply the wrong standards to this environmental review.

II. THE PURPOSE AND NEED AND OBJECTIVES SHOULD BE MODIFIED

A. Purpose and Need A need for action should be limited to new activities, with new federal action required, with the potential for effects on the human environment. In the recent Ranch Comprehensive Management Plan Environmental Assessment - the NEPA process that was halted by a lawsuit, the NPS clearly stated in the purpose and need that the EA was to "Identify collaborative management opportunities that promote protection of Shafter era ranching." Notably, this need is missing in the currently stated purpose and need. This GMPA EIS process is to address the same planning area and the same issues the Ranch CMP EA was meant to address. Clearly, there is still a need for improved collaboration and a need to respect and promote the Shafter Era agriculture - a vibrant, diversified, locally connected agricultural model. In order to not lose sight of what NPS recognized as an important need, ranchers propose the purpose and need include the following: "To provide clear guidance and streamline processes for PRNS and regulatory review of proposed new ranching activities consistent with Shafter era ranching and farming activities, including best management practices that promote the restoration of culturally appropriate agricultural practices and promote protection of seashore resources."

B. Plan Objectives NEPA EIS processes usually include plan objectives. Actually, PRNS routinely includes plan objectives to share with the public at the onset of the process, as it did during the Ranch CMP EA process. In this current process, instead of omitting the plan objectives, ranchers suggest PRNS revise its documents to include objectives. Ranchers suggest a plan objective similar to the recent Ranch CMP EA process that covered the same planning area and same activities: "Clarify NPS and Ranchers' expectations and commitments to ensure consistency of agricultural lease/permits", and "Identify and evaluate activities that provide operational flexibility to support the dairy and beef cattle operations as well as the diversified agricultural activities that were present during the Shafter era in a manner consistent with the protection of seashore resources and World Heritage Site management principles that recognize 'continuing landscapes.'" NEPA requires an agency to review the effects of its federal action on the whole human environment, not just the effects its action may have on the natural environment. The viability of the ranchers and the hopes of the community are parts of the human environment that this EIS must consider. Ranchers suggests another plan objective: "To create a plan that will allow current practices to continue, allow for 20-year leases/permits, allow for the recovery of diversified agricultural production consistent with Shafter era agriculture and to ensure ranchers' financial viability in a manner consistent with the protection of seashore resources."

Certain seashore ranch lands have recently been taken out of agricultural production, completely changing the

land use and its intensity of use, without any environmental review or public involvement. In some cases, historic ranching families have been displaced. Ranchers ask that one more plan objective be added: "Restore agricultural activities in the Olema Valley and Point Reyes Historic Ranch Districts where they historically existed and are not otherwise prohibited by law or are no longer agriculturally viable in areas where grasslands were replaced by dense brush or forest long ago." This EIS should consider the benefits of having an Agricultural Advisory Committee familiar with these ranch lands involved in the decision-making about which areas are agriculturally viable and which are not.

III. PLAN ALTERNATIVES NEPA requires a "range of alternatives" to compare and contrast during the EIS analysis. It is expected that the range of alternatives would include alternatives both more favorable to ranchers and less favorable. In this case, as a result of the settlement agreement, NPS included several alternatives that are quite unfriendly to the ranchers and would lead to the demise of some or all of agriculture at Point Reyes. Unfortunately, NPS failed to include any alternatives that would be favorable to the continuation of viable ranching for all ranchers. No alternative includes managing elk for separation from ranch lands. Only one alternative contemplated removal of only the Drakes Beach elk herd while the elk on other ranches, specifically in the Drakes Estero trail area, would not be removed and would continue to significantly harm the ranchers' business and, in some cases, its natural resources. As we know, the elk population is quickly increasing and is, thereby, also increasing the adverse effects to the affected ranchers' livelihoods. Importantly, this is currently the most ranch-friendly alternative. Not one alternative allows the public to consider the restoration of ranching activities where the activities have recently ceased. Not one alternative considers expanding agriculture into new areas. The current range of alternatives is biased against the continuation of viable ranching and dairying. To correct the anti-ranch bias in the range of alternatives, at least one alternative that more fully supports the historic agricultural activities should be considered. NPS could attempt to create an alternative that fully supports viable ranching and dairying. This alternative could include removal of elk from all of the ranch land (ranchers are not asking for complete removal from the Seashore), expansion of ranching into new areas (ranchers do not support expansion of ranching into new areas, but it should be considered to balance out the alternatives). NPS has selected Alternative B as its proposed alternative. Although this alternative suggests that ranching continue, ranching and dairying may not be viable under this alternative. The suggested elk management techniques described in alternative B might sound reasonable to the uninformed public, but actually, these are the exact same techniques PRNS has used for the past decade and these techniques have proven to be ineffective. Furthermore, even if the NPS could now be successful managing the elk, Alternative B suggests a Drakes Beach elk herd size of 100! That number of elk in this herd would almost certainly result in the loss of at least some of the ranches and/or dairies in the region. This proposed alternative also fails to recognize that there are significant, known and documented, adverse elk impacts from the Limantour herd leaving the designated elk range and harming ranching in the area around Drakes Estero trail. The PRNS proposed alternative states that "NPS would evaluate management of tule elk from the Limantour free-range herd if they affect ranchlands, implying that they are unaware of the known and documented impacts upon the ranchlands in the area. The NPS EIS team and the public must be made aware that Alternative B, the NPS proposed alternative, would result in further elk/rancher conflicts, potentially more NPS/rancher conflicts and most certainly, the loss of historic ranching and dairying within the planning area. Each action alternative includes the proposal to "establish approximately 900 acres of resource protection buffers". Ranchers agree with most of these newly proposed buffers and look forward to working through the actual boundaries and management of these areas with the PRNS EIS team and staff, and hopefully, the PRNS Agricultural Advisory Committee. This EIS team and the public needs to understand that this is only the latest 900 acres of ranch land where agricultural activities have been removed in favor of "natural resources". When PRNS was established by Congress, many more thousands of acres were in "agricultural use" than there are today. 900 new acres is only a small fraction of the agricultural property within PRNS and GGNRA already lost. This EIS team should analyze and include in its EIS the number of acres of agricultural property the NPS has already taken out of production since the creation of PRNS and GGNRA.

4 Ranchers, in collaboration with many partners, support the COMMUNITY ALTERNATIVE, an alternative that strikes a balance of collaborative conservation, whereby ranchers and dairymen can continue to protect natural resources and operate viable businesses that will protect cultural and natural resources into the future. The COMMUNITY ALTERNATIVE also recognizes, respects and incorporates certain portions of Congressman Huffman's thoughtful language found in his legislative report for H.R. 6687.

B. Community Alternative: Continued Ranching and Manage Elk For Effective Separation From Ranches Based on the purpose and need for action, the Community proposed action includes the following elements:

- Issue agricultural lease/permits with up to 20-year terms to existing ranch families to continue beef and dairy and associated agricultural operations on

approximately 27,000 acres within the planning area. • 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. • Explore opportunities for ranch operational flexibility and diversification, establish up to approximately 900 acres of collaboratively managed resource protection buffers, and provide a programmatic review and approval process for operational flexibility, diversification and best management practices. • Tule elk would be managed for effective separation from ranches. No elk herds would be allowed to establish in the planning area. • The NPS would implement a strategy prioritizing maintenance of historic buildings on ranches in collaboration with seashore ranchers. Prioritization would take into account historic preservation goals and the needs of ranch operations. In some cases, adaptive reuse of historic buildings would be considered to support diversification activities. • NPS would implement strategies to remove non-native, invasive plants and to manage special status plants in collaboration with seashore ranchers. • Strategies for the management of historic ranch complexes within the planning area but not part of currently active ranch operations would be identified including: prioritization of specific buildings, structures, and landscapes for preservation based on their importance to the overall integrity of the historic district and opportunities for adaptive reuse. As appropriate, the seashore would evaluate potential for decommissioning/deconstruction of low priority or substantially degraded structures/complexes as part of this plan. The community proposed action represents one alternative that should be considered during the EIS process.

IV. THE APPROPRIATE ENVIRONMENTAL BASELINE

Ranching and farming activities have been present in the planning area for at least 150 years. During the Shafter Era cultural period focused upon in this EIS as it was in the recently halted Ranch Comprehensive Management Plan Environmental Assessment, an extremely diversified agricultural network existed. During this period there were thousands of acres in crop production, a myriad of livestock species being raised, oysters being harvested, processing facilities for milk, cheese, butter, meat and crops and spring forages were being harvested and stored for winter livestock feeding. Certainly, the current GMPA will respect this rich cultural heritage and will fully explore ways to promote and restore historic, small scale diversified ranch practices. The current baseline looks very similar to what has existed for 150 years, with a few exceptions. Today most of those activities are permitted by PRNS on some ranches, but not all. If an activity is currently allowed, it should be part of the current environmental baseline. For example, within the last 5 years, the current baseline includes dairy and beef operations, storage of on-farm harvested forage for livestock feeding, small scale row crops, poultry raising, bed and breakfast operations, on-farm sales of products raised in the seashore, horse boarding and on-farm tours and interpretation. Allowing all ranchers the same authorizations to undertake activities that PRNS already allows for some ranchers should not require an EIS. Only new activities, not a part of the current baseline, should be the subject of this EIS. Tule elk were extirpated from the planning area by the 1860s. Tule elk were not present during the Shafter era. Tule elk were not present when Congress entrusted the NPS to protect the seashore, the ranches and farms and the people on the ranches and farms. Only a few years ago, NPS decided to re-introduce tule elk to the 18,000-acre designated elk range located entirely within the Limantour wilderness area. By this time (1998), it was well known that for introduced tule elk in an area without predators, population control would be necessary. The current elk management plan reassured seashore ranchers that the ranch lands would be protected because the plan stated that the elk would not negatively affect any other permitted use (long-standing ranch SUPs) and the plan included tools to manage elk overpopulation, including contraception, relocation and culling. For some years, PRNS interpreted the plan just as the ranchers interpreted it and kept the elk off of the ranch lands. The Seashore's 2001 "Year in Review" (attachment a) acknowledged the need to "carefully monitor" to keep the elk outside the pastoral zone, to prevent their interfering with the cattle ranches and to ensure that the elk "are not shedding the organism that causes Johne's disease." The fact that elk and cattle cannot coexist was implicitly recognized in the current plan by its provision of tools and assurances. Nevertheless, beginning in about 2002, management, pursuant to the Elk Management Plan, to keep the elk within the designated elk range ceased. The result was the development of a new herd of tule elk in the pastoral zone. The elk on any seashore ranches must be recognized as temporary and non-compliant with the Elk Management Plan, as elk negatively affect permitted uses (ranching). These elk were allowed to establish outside the designated elk range studied in the 1998 Elk EA and no NEPA process was initiated to establish this new herd on ranch lands. This action is a violation of the NEPA process, and cannot be condoned by allowing this herd to be part of the environmental baseline of the current GMPA EIS process. Doing so would encourage federal agencies to simply do what they want, without a

public process; because when challenged, the agency can simply state that "they're here now so they're part of the baseline". NEPA was established to end this type of conduct by federal agencies. The environmental baseline for this GMPA EIS planning area should recognize all of the ranching, farming, interpretive, processing, visitor serving and retail activities that have existed over most of the past century, with no tule elk present. This EIS must address what to do with the elk and how to separate the elk from grazing livestock. The significant adverse effects of elk in the planning area are not baseline effects. Relocation and other population controls to remove the elk from the pastoral zone have already been approved through the public 1998 NEPA process and nothing prohibits PRNS from re-establishing conditions contemplated and approved by that process and plan. V.

CONSERVATION FRAMEWORK For the first time, PRNS has included zoning and zoning restrictions on ranchlands. Ranchers understand the difference between ranch core areas, pastures and rangeland. For all recorded history, ranchers have managed all three Land Management Units (LMU). Ranchers, and later, NPS with ranchers, have managed all these LMUs without the need for LMU labels. Ranchers consult with resource experts including the Natural Resources Conservation Service, Marin Resource Conservation District, University of California Cooperative Extension Service and the National Park Service. Intelligent, appropriate management has been practiced within the planning area for many decades without LMU designations. The conservation framework as shown in the PORE Public Scoping Newsletter is highly problematic. Firstly, the criteria for Range could be used to characterize almost all of the ranchland as "range". This is a huge problem for a number of reasons. Firstly, this designation could enable NPS officials to label as much area as possible as range land. Secondly, the suggested management restrictions could be debilitating to the rancher. For example, ranchers have historically used these areas and performed conservation projects in these areas in ways that would be prohibited under these new, unnecessary restrictions. Similar problems would result from the ranch core, and the pasture designations because of these newly suggested restrictions. Ranchers, conservation experts and the PRNS should be able to discuss, plan and implement reasonable conservation practices and other uses as appropriate on ranch lands. The conservation experts and the NPS would not recommend or allow a bad idea or damaging activity to be implemented - no matter what the LMU. Implementing this conservation framework could add complexity to project implementation and could lead to a reduction in conservation projects planned and implemented by ranchers. It could also add difficulty and complexity to the implementation of carbon farm plans. Or prohibit them altogether. It appears that the only outcomes of this new "conservation framework" if implemented as presented, would be to: 1) create confusion and disagreement between NPS and ranchers due to the subjective and broad definitions of the LMU designations and 2) creation of a new zoning tool used to restrict regular or new activities on the ranchlands in the planning area. This condition could be devastating to the ranchers because of the subjective, regulatory and restrictive nature of this framework. As seen in the past, PRNS could interpret the Conservation Framework criteria differently over time. Ranchers do not see any advantage to creating this LMU framework within the planning area where ranchers have managed all these resources for generations. This framework may be useful in other areas where tenants change and don't have the institutional and intimate knowledge of the land that the ranchers within the planning area all possess, but is inappropriate in the planning area. Should the NPS decide to impose LMU designations and new restrictions on the ranchers in the planning area, this EIS process should evaluate the benefits of establishing an Agricultural Advisory Committee to work with NPS and the ranchers to revise and/or confirm the criteria for each LMU and revise and/or confirm the restrictions for each LMU. The suggested Ag Committee members have long-term, intimate knowledge of the ranches within the planning area, have assisted ranchers within the planning area create their farm plans and have helped design conservation projects on these ranches. It is unlikely that anyone at NPS has the history or the experience to accomplish this task properly. NPS Attempts to do so without Ag Committee engagement and oversight would almost certainly result in unnecessary conflict. The conservation framework contains unreasonable restrictions. 1. Range LMU - NPS suggests that "generally, no pasture management or diversification activities" should occur in this LMU. Example: no pasture management in an area where brush is overtaking the grassland is a bad idea. In this instance, ranchers should be allowed (encouraged, because it preserves the open, grassland, pastoral scenery) to mow using mechanized equipment or to use other livestock known to target invasive brush (e.g., goats). Under the framework shared in the newsletter, could the goat BMP be restricted? Yes. Could the mechanized mowing be restricted? Yes. Could carbon farm BMPs be restricted because the BMPs are "management"? Yes. The current definitions and restrictions could lead to a loss of productive grasslands, a loss of the cultural landscape and a missed opportunity to help reverse climate change. Ranchers understand that management of all LMU areas is necessary. This EIS must not create impediments to good stewardship performed by good stewards. Certain agricultural activity restoration (diversification) should be

allowed in R-range LMU. This EIS should evaluate the benefits of allowing specific livestock that could be used to remove invasive plant species. This EIS should also consider the value of allowing mechanized mowing of brush or other invasive plant species as necessary - a practice used by ranchers on rangeland for generations. Creating a LMU that prohibits these good rangeland management practices is absurd, and would have long term major adverse effects. Non-management of these areas will lead to an invasion of brush, loss of grassland, a shift in wildlife species composition and a loss of the open grassland pastoral landscape. ii. Pasture LMU - NPS suggests manure management would be allowed for dairies. What about the beef ranches? What about compost applications as part of a carbon farm plan? NPS includes a criterion for pasture LMU: "comprised of introduced or domesticated native forage species". This creates a suite of problems. Under this criterion, if a small number of native grass species are present in a field, could the NPS decide to exclude it from pasture and include it as rangeland? Yes. This is a huge problem because ranchers have been using management - controlled grazing, management intensive grazing, rotational grazing, nutrient management, 8 mowing and other tools to encourage the recovery of deep rooted perennial grasses and other native species. This non-native only criteria could lead to a reduction in efforts to restore native species and encourage the expansion of non-native invasive species within the planning area because of the management restrictions applied to the range LMU. This EIS team must be made fully aware that currently, ranchers are using management practices in an effort to reduce non-native invasive species and to promote native species - regardless of LMU, and that these important efforts should continue to be allowed. The practices identified in carbon farm plans that are being developed by the Marin Resource Conservation District, the Marin Carbon Project and the Carbon Cycle Institute for ranches within the planning area must also be allowed to be implemented, regardless of LMU. These plans are prepared by experts in resource management with a focus on sequestering carbon on grazing land, regardless of LMU. This EIS team must not allow a framework that could, in any way, restrict the best management practices that would reduce atmospheric carbon. The pasture LMU is the most reasonable location for certain agricultural practice restoration (diversification). Pastures have been highly managed for generations. Pastures have had multiple grazing species, hay fields, artichokes, beans, grains, prescribed burns, mowing, etc. The EIS should consider the benefit to the ranching families and the visiting public who would begin to get the flavor of the historic era of these ranches if the PRNS would allow the modest, limited, small-scale, historic activities described in the diversification section of this scoping letter. Diversification would provide resiliency to our community and to the ranching families as environmental and weather conditions change due to climate change. By not allowing diversification within pasture LMU would essentially be telling the ranching families that they cannot contribute to the local food movement, as most milk and beef produced leaves the community and is processed and sold elsewhere. Not allowing diversification on pasture LMU would deprive the visiting public's chance to actually witness the working landscapes that are representative of the historic period that is supposed to be protected and restored. Not allowing diversification would perpetuate a cow-only monoculture. This EIS team should evaluate the adverse environmental and social effects of preventing agricultural diversification. In this case, at PRNS, it is vital to look forward. The EIS team must consider that the last time the PRNS GMP was updated was in 1980 - 38 years ago. The GMPA that will result from this EIS process is likely to be policy for a very long time. This EIS team must consider the fact that climate conditions are changing, and ranching activities and practices must change in response. Not allowing diversification on pasture LMU would defer the need for resiliency into an unknown future. The EIS team must consider that family farmers outside of PRNS will be forced change as necessary to be resilient in the face of climate change and changing market demands. Allowing flexibility of use on pasture LMU and, of management on range LMU is vital for long term sustainability and resiliency for the ranching families, the natural resources, the visiting public and the PRNS ability to preserve the historic working landscapes. Ranch Core LMU - This LMU appears to be created to attempt to restrict diversification -the recovery of agricultural production once widely practiced in the planning area. Restricting these historic activities to "2.5 acres of disturbed land immediately adjacent to the improved complex would be available for 9 diversification activities such as row crops and other livestock." This definition would essentially make any meaningful recovery or restoration of the historic use of the planning area impossible - public process or not. Firstly, 2.5 acres is too small for any economically viable model. These are working ranches and the economics of restoring historic activities must be considered. Next, it must be "disturbed land" to qualify for row crops or other livestock. This is also a ridiculous requirement. If a rancher has no disturbed area immediately adjacent to the ranch core, could NPS prohibit the diversification altogether? Yes. Row crops need good soil and water to thrive. Disturbed soil next to the buildings should not be the only criteria. Other grazing livestock need forage from pastures to thrive. Disturbed soil, immediately adjacent to the buildings should not be the only criteria. In fact, it appears that the

ranch core restrictions were either created by NPS without any agricultural knowledge or the conditions were created to prohibit diversification, including recovery of historic activities. This EIS team should consider eliminating the diversification restrictions from the range LMU. Restoration of certain agricultural activities is appropriate near the buildings and some is not. Activities should be allowed where appropriate and not forced into a tiny area where not appropriate. This EIS should fully evaluate the adverse effects of removing flexibility, sustainability, and resiliency through imposition of the newly proposed restrictions. iv. For the above reasons, the unnecessary and debilitating Conservation Framework should either be eliminated or completely reworked with the assistance of the new Agricultural Advisory Committee described elsewhere in this scoping letter. VI. IMPACT TOPICS THAT SHOULD BE ADDRESSED BY THIS EIS It is crucial that the EIS provides an objective, fair and thorough analysis of the positive effects of the agricultural operations situated within the project area. These include preservation for the public of the cultural heritage of the working landscapes of the project area, the ecosystem services provided by the grazing livestock, as well as the environmental, educational, economic and scientific contributions made by these historic family farms. A. Ranch Operations and Activities 1. Review of Permit Structure Historically and currently, PRNS has issued SUPs to ranch operators for terms from five to twenty years. The November 2012 memorandum from the Secretary of the Interior directed the NPS to consider offering 20-year leases/permits to all ranchers. The NPS Director, following the Secretary's decision, issued a directive to PRNS to begin issuing all of the ranchers 20-year permits. As PRNS has already offered 20-year agreements to some ranchers without a formal NEPA process, ranchers believe PRNS could similarly offer 20-year leases/permits to all ranchers without initiating the current EIS. However, because PRNS included the review of permit structure as an issue to cover in this EIS, ranchers herewith provide some guidance for the process. This EIS should fully evaluate the concept of a 20 year "rolling renewal" agreement. In this type of agreement, at the end of each year the lease is automatically renewed for the length of the initial 20-year term, unless either the landowner or the farmer decides that the current term will be last 10 term. In this way, the parties can continuously capture the benefits of a long-term lease. The benefits include: 1. More commitment by the rancher to invest in infrastructure and repairs; ii. Improved public enjoyment of the seashore because ranches would have the security to do more upgrading maintenance projects; iii. More likely that banks will offer loans to the rancher; 1v. More likely that ranchers will invest in long term rangeland improvements; v. More likely that ranchers will invest in resource conservation projects; v1. More rancher eligibility for resource conservation project grants; vii. Reduced NPS staff time and paperwork; viii. Reduced rancher stress as permits near expiration; 1x. Facilitated meeting of project objectives into the future; x. Creation of more public trust that NPS actually does support the long-term continuation of ranching and farming in the project area; and xi. Increased security and incentive for the next generation ranchers within the planning area to continue the family farming tradition. This appears to be a perfect place and opportunity to utilize a rolling renewal agreement because the seashore has respected the relationship of the families with the land as part of the cultural landscape, and the leases/permits have never been put to public bid and have always been renewed with the historic families that pre-existed the seashore. A process that would allow the parties to meet every five years to review compliance with conditions, amendments and lease/permit payment rates should be evaluated to support the mutual benefit of a rolling renewal agreement. The NPS and the public would be protected from a failure to comply with permit requirements, just as they are protected today. Currently, the PRNS imposes a 30-day cancellation clause for any rancher not complying with lease/permit conditions, a form of landowner protection that could also be included in a new rolling renewal agreement. Ranchers recognize the fact that the mutual benefits of a rolling renewal agreement far outweigh any imagined negatives. Rolling renewal agreements have already been recognized by Congress as a valuable concept and tool to preserve agriculture. The Williamson Act is a perfect example of how a commitment to the long-term continuation of agriculture can be accomplished through rolling renewals. This EIS should evaluate the benefits of creating an Agricultural Advisory Committee consisting of local agriculturalists, local range managers, other federal, state and local resource protection services and professionals who regularly work with seashore ranchers to manage the day-to-day ranch activities. Board members would be familiar with agricultural practices in the Marin and 11 Sonoma foodsheds and with the culture, climate, soil and market conditions that impact the ranches in the seashore. This model is consistent with NPS policies supporting local community involvement and with the UNESCO principles for World Heritage Site cultural landscapes. It is particularly appropriate for "working" or "continuing" landscapes, which are often part of larger communities. This Ag Advisory Committee could 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 decisionmakers whenever a question or decision regarding the agricultural activities or other agricultural issue in the planning area. This EIS is evaluating farm diversification activities and how diversification would benefit the NPS, ranching families, the local community and the visiting public. This EIS analysis will certainly expose the fact that the NPS has little agricultural experience and would benefit from an advisory committee well-versed in the current agricultural activities as well as the committee's competence in creating the important guidelines necessary to restore some of the historic, diverse production. This EIS should fully consider the benefits of an Ag Advisory Committee, including: 1. Improved relationship and trust between parties; n. Informed decisions about agricultural activities by individuals with experience in agriculture; iii. Reduced concerns about how much agricultural experience the PRNS and the National Park Service has; 1v. 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; v. Increased continuity, as members of the committee will have less turnover than PRNS staff; v1. Increased community involvement with the future of food production in the planning area; and v11. Reinforced public commitment to continue viable agriculture in the planning area in perpetuity.

2. World Heritage Site Status The Point Reyes and Olema Valley Historic Ranch Districts, located within Point Reyes National Seashore, have recently been listed on the National Register of Historic Places. This EIS should evaluate the nomination of these historic Ranch Districts for World Heritage Site status. Ranchers believe that NPS can nominate these ranch districts for World Heritage Site Status and that this status would further the plan objective of preserving ranching and farming in the project area in perpetuity. In the meantime, with Cuyahoga as precedent, NPS could and should manage the lands consistent with World Heritage Site principles for managing "continuing" cultural landscapes.

3. Restoration of Historic Farm Practices (Diversification) Background Agricultural operations everywhere need to respond to changing market realities, as has been true of the ranches in the Seashore since they were started in the 1850s. One of the primary ways that Seashore and other Marin County ranching families have been able to remain economically viable and continue ranching operations generation after generation is by diversifying what they produce and, in many cases, adding value with some type of processing. Sustainable agriculture relies not only on productive soils and adequate water, but also on each farm family's ability to respond to the need to diversify their farming operations as changing times require. Diversification has saved numerous Marin family farms over the past decade as the younger generation chooses to produce new products and find new markets to keep 4th and 5th generation farms viable. The Seashore has an excellent record of being open to diversification and approving ranchers' diversification proposals. So far, the Seashore has approved small-scale row crop operations, chicken operations, farm tours and interpretation, and farm stays. It's important for that philosophy to continue under the updated PRNS General Management Plan in order to help preserve the vibrant pre-Seashore ranching landscape, community, and economy.

General Recommendations History as a guide for diversification. As a general rule, historic precedent can be a guide to the kinds of diversification that should be considered appropriate in the National Seashore. Crops, livestock, and ranch operations that have environmental impacts similar to, or the same as, those in the century before the Seashore should also be candidates for the future. At the same time, the Seashore's natural resource management mandates and modern understanding of stewardship will influence the scale, siting, and other permit conditions. Integrating cultural and natural values in management in the GMP amendment. We recognize the continuing challenge of integrating management of historic values, as reflected in a cultural landscape of healthy working ranches, with management of natural values. However, the GMP amendment and EIS should include a clear explanation, citing the legal foundation for it from the enabling legislation (e.g., Sections 459c-5 and 459c-6) and other authorities, that Seashore management of the lands under permit for agriculture cannot be identical to the Seashore's management of non-agricultural lands. Ideally, the GMP amendment will also state a goal that, to the extent possible, the ranch operations in the Seashore will be no more constrained than other ranches in Marin County. Maintain current practices as a baseline. Current agricultural practices on all or some ranches should be considered a baseline level that won't be reduced under the GMP amendment. If some modifications are necessary, they should not substantially interfere with the current practices.

13 Scale of diversification proposals. Many of our recommendations include two levels of review related to the scale of proposed diversification. The first level would have general/conceptual approval and programmatic implementation in the GMP amendment, recognizing that there will still be important questions related to siting, natural resource protection, fences, etc. to be resolved for final approval of a specific proposal. Diversification proposals beyond that scale will require a higher level of review similar to what the Seashore currently gives to diversification requests. Caps on diversification. Most of our specific recommendations include caps on acreage

or numbers of animals or numbers of ranches that would be given conceptual approval in the GMP amendment. As noted in the preceding item, diversification proposals beyond those caps will require a higher level of review similar to what the Seashore currently gives to diversification requests. We hope that the experience of the Seashore and the ranchers with small scale diversified operations approved below the caps will make review of later proposals above the caps easier. If the Seashore, the visiting public and the ranchers are having a good experience with a particular type of diversification, it may be easier for the Seashore to approve an increase in that activity. Agricultural Advisory Committee. During the GMP A EIS process and later, as individual ranches begin to restore historic, diversified practices, we believe that the Seashore and the ranchers would benefit greatly from the review and advice of a body such as the agricultural advisory committee proposed to the Seashore by the ranchers and other community members. That group would be an excellent source of information on best practices outside the Seashore and suggestions of how to adapt those practices to the circumstances of individual ranches in the context of Seashore mandates for both natural and cultural resource management. Ranch core areas and diversification. We suggest that limiting diversification to core areas (highest-use areas around ranch buildings) is appropriate for some types of diversification. Processing, sales, farm stays, and perhaps some livestock diversification are examples. However, cultivated crops and grazing livestock should go where it makes sense to put them based on water, soils, slope, water quality protection, desirability of companion grazing rather than segregation of ruminants, visual impact, and other factors. The best choices for some forms of diversification are likely to be outside the core area. Seashore permits and rancher partnerships. The new lease/permits should not create barriers to partnerships or other transactions among Seashore ranchers who want to work together on agricultural endeavors. This applies especially to diversification projects, where, for example, necessary expertise, equipment, facilities, labor, capital, and an appropriate site might not all be present on one ranch. We recommend that the GMP amendment explicitly recognize this objective and provide at least conceptual approval for it.

Specific Recommendations Diversification of livestock for food or fiber: 1) Ruminants. There is current and historic precedent for sheep and goats on ranches in the Seashore. Sale of their meat or special types of wool can diversify ranch income. They also can provide rangeland management benefits through companion grazing and related techniques that are both accepted now and still being developed. Various combinations of animals can be used to graze pastures more efficiently. Brush and weed management is one benefit of multi-species grazing with cattle and small ruminants. Varying terrain also lends itself to multi-species grazing. On terrain that is steep and rough, for example, goats and sheep are superior to cattle. Recommendation. We recommend that the GMP amendment allow small-scale production of sheep, goats, and possibly other small ruminants for food or fiber. The GMP amendment could approve substitution of sheep or goats for up to 10% of beef cattle or dairy cow AUMs in a ranch's permit. (There are various animal-unit formulas, but they typically consider 5 sheep or 6 goats to be one AU, depending on the size of the breed.) Proposals to allow greater numbers would require second-level review. 2) Swine. For about 80 years of the history of ranching on Point Reyes, every ranch produced butter or cream, and many of those ranches produced pigs, raised on the skim, which would be supplemented by other feed. (In an interview with Dewey Livingston, Joe Mendoza estimated that pigs contributed about 25% of ranch income.) Large swine operations have a deservedly bad reputation in many areas of the country. None of the problems associated with them should be a factor in small-scale, well-managed operations. Modern swine husbandry protocols exist; see for example: Producing organic pork from Point Reyes for a niche market might become an attractive form of diversification. 1 Pigs could be an excellent element in diversification strategies because of the feed that could be available for them: 1. Skim milk resulting from a dairy's shift to butter or some product that results in skim milk as a byproduct, 11. Barley grown in the Seashore; and 111. Agricultural byproducts such as waste vegetables from row crops. Recommendation. We recommend that the GMP amendment allow small scale swine operations up to a limit of 8 sows. Larger swine operations would require second-level review. 3) Poultry. There is current and historic precedent for commercially raising chickens for broilers and/or eggs on Point Reyes. (For example, Pierce Ranch, the only ranch for which Dewey Livingston cites numbers, averaged 54 dozen eggs a week in 1870.) Poultry may be an attractive diversification alternative for a few ranchers interested in providing an organic product to a local niche market. The choice could be chickens, turkeys, or ducks. Recommendation. We recommend that the GMP amendment allow small-scale poultry operations. Choosing a cut-off number for "small-scale" is quite arbitrary, but we suggest 500 for laying hens, 200 for broiler chickens or ducks, and 100 for turkeys. Larger operations would require second-level review. Row crops, vineyards, orchards and grain diversification: 1) Row crops. The agricultural history of Point Reyes includes commercial production of substantial amounts of artichokes, peas, and potatoes, and smaller amounts of other vegetables. Hundreds of acres of artichokes, "acclaimed by state inspectors and connoisseurs as the best in

the state," were grown on several ranches in the 1920s and 1930s, including at least 500 acres on Home Ranch (the actual acreage is unclear in Livingston and may have been as high as 1,000), 300 acres on H Ranch, and similar amounts on F and B ranches. Five separate farmers grew peas on "1 00s of acres" of Home Ranch in the 1930s.

Recommendation. A limited but currently unknown amount of land in the Seashore is suitable for row crops given constraints of soil, water, slope, and other factors. We recommend that the GMP amendment allow up to 15% of the acreage of a ranch to be used for row crops, up to a total of 300 acres in the Seashore (about 1 % of the Seashore's 28,000 agricultural acres - a small fraction of the historic use). Row crop projects would be approved on a first-come-first-served basis up to the 300-acre ceiling. (Currently, only a few ranchers are interested in growing row crops - totaling about 30 acres (about 1/10th of 1 % of the agricultural acres)). Proposals for row crops beyond the 300-acre ceiling would require second-level review.

2) Orchards. There is historic precedent for orchard fruit plantings on at least Home Ranch, a commercial experiment that was later abandoned. With the current availability of excellent apple varieties (and perhaps other fruits) for our climate, small-scale orchards may be attractive for the few ranches that may have appropriate conditions. **Recommendation.** We recommend that the RCMP allow up to 5 acres of orchard fruit plantings per ranch. Proposals for greater acreage would require second-level review.

3) Vineyards. We know of no historic precedent for vineyards at Point Reyes, and conversion of land to vineyards has become highly controversial in our region. PRSRA agrees that vineyards should not be allowed within PRNS.

3) Silage, hay, and grain crops. Prior to the 1950s, there was a long history of growing large amounts of hay on Point Reyes, much smaller amounts of barley and oats, and at least some experimentation with wheat. There is also the nearly 40-year current experience of growing silage or haylage on four ranches. Two ranches would like to convert some pasture to silage or haylage. Grains were used to feed livestock in the past, especially barley for pigs and poultry, and might be used that way in the future. Some ranchers might want to develop a niche market for organic Point Reyes grains for human consumption. (Brick Maiden and Tartine are two leaders among Bay Area bakeries that feature organic California wheat in some of their products.) Grain crops and forage crops require essentially the same cultivation methods, have essentially identical impacts and look alike. As a matter of fact, the planted forage crops are often the same grains as the grain crops. Harvesting methods would vary. The visiting public would not notice any difference between the crops. **Recommendations.** We recommend that the GMP amendment allow:

1. The currently haylage and silage to continue at the levels currently permitted, which is about 1,000 acres (see General Recommendation 3);
11. Ranches that currently do not grow hay, haylage, or silage each to grow up to 75 acres;
- 16 iii. Ranches that grow hay, haylage, or silage to substitute other grains such as oats, barley, or wheat, acre for acre;
- iv. Ranches that grow hay, haylage, or silage to grow seed for the next season within their permitted hay/haylage/silage areas;
- v. Ranches to share hay, haylage, silage, seed, or grains with each other to make the most efficient use of what is produced in the Seashore, reduce what feed needs to be imported, and reduce importation of weed seeds.

Total silage, hay, or grains in the Seashore would be capped at 1,500 acres under the GMP amendment (500 acres more than the current total - a small fraction of historic use). Proposals for those forage & grain crops beyond 1,500 acres would require second-level review.

On-ranch processing, sales, and farm stays

1) Processing. All the Point Reyes ranches processed cheese and then butter from the earliest days till 1915 when the cooperative creamery began in Point Reyes Station. Some ranchers may wish to begin appropriate-scale processing of dairy products, vegetables, fruit, grains, or other food and fiber products from Seashore ranches. **Recommendation.** We recommend that the GMP amendment allow on-ranch processing of food and fiber products from Seashore ranches. A ranch with a processing facility should be able to process products from that ranch and from other ranches in the Seashore, which would minimize the need for processing facilities and increase efficiency. We propose the following three conditions, which are modeled on provisions of the new Marin County Local Coastal Program, which allows on-farm processing as a Principal Permitted Use on ranches outside the Seashore:

1. The structures used for processing activities do not exceed an aggregate floor area of 2,000 square feet [the LCP maximum is 5,000 square feet];
11. With the exception of incidental additives or ingredients, agricultural products to be processed are produced on the same site or on other agricultural properties located in the Seashore [the LCP allows products from properties in Marin County other than the one with the processing facility but requires those properties to be owned or leased by the processing facility owner or operator];
111. The operator of the processing facility is directly involved in the agricultural production on the property on which the processing facility is located.

In addition, we recommend structures for processing be restricted to ranch core areas. First priority for processing structures would be use of existing structures. If existing structures are not appropriate, the GMPA should allow the use of the square footage and, possibly the actual footprint and location, of buildings that are documented to have been present but do not currently exist. Processing facilities larger than 2,000 square feet, processing facilities that cannot be

located in existing structures or within the square footage of previously existing structures, and bringing products in from outside the Seashore for processing would require second-level review. 17 2) On-farm sales. Johnson's and Drakes Bay Oysters are the only historic precedent we are aware of for on-farm sales on Point Reyes. There has been a small boom in farm stands in Marin County and elsewhere in the US where there are family farms and ranches. If livestock and crop diversification occurs on ranches in the Seashore, farm stands could be an important accessory activity and one that could become a valued feature of visits to the Seashore. They would also provide a rare opportunity for Seashore visitors to have a modest connection with the ranches they drive through. Marin County planning recognizes the importance of on-farm sales as an option for some ranch families and has provided for it as a Principal Permitted Use in the new Local Coastal Program. Recommendation. We recommend that the GMP amendment allow on-ranch sales of food and fiber products from Seashore ranches. A ranch with a farm stand should be able to sell products from that ranch and from other ranches in the Seashore, which would minimize the number of farm stands and increase efficiency. We propose the following conditions - modeled on provisions of the new Marin County Local Coastal Program, which allows farm stands as a Principal Permitted Use: i. The structure used for retail sales does not exceed an aggregate floor area of 500 square feet; 11. Agricultural products to be sold are produced on the same site, or on other ranches in the Seashore [the LCP allows sale of products from "other agricultural properties located in Marin County that are owned or leased by the sales facility owner or operator"]; 111. The operator of the sales facility is directly involved in the agricultural production on the property on which the sales facility is located; and iv. Sufficient parking, ingress, and egress is provided. In addition, we recommend that structures for farm stands be restricted to ranch core areas. First priority for farm stand structures would be use of existing structures. If existing structures are not appropriate, the GMPA should allow use of the square footage and, possibly the actual footprint and location, of buildings that are documented to have been present but do not currently exist. Farm stands larger than 500 square feet, farm stands that cannot be located in existing structures or within the square footage of previously existing structures, selling products other than those specified above, and selling products from outside the Seashore would require second-level approval. 3) Farm stays and farm tours. Overnight stays on working ranches in the Seashore would offer more recreational opportunities for visiting families interested in experiencing the working landscape culture with the families that have been a part of the landscape and history for generations. Allowing visiting families to experience the farm through organized tours and to actually stay at the farm could be worthwhile visitor-serving activities. The public could learn about the history of the Seashore and the value of cooperative conservation where both food production and natural resource conservation coexist. 18 Recommendation. We recommend that the GMP amendment allow farm stays in re-purposed existing buildings in the core ranch area on the limited number of ranches that have structures that could accommodate them and allow tours on any ranch that wants to offer them. The intent of these types of diversification is, as the new Marin County LCP puts it, "to ensure that the Homestay [and/or tour] is accessory and incidental to, in support of, and compatible with the property's agricultural production." For farm stays, we propose the following conditions - modeled on provisions of the Marin LCP: 1. A ranch shall have no more than five guest rooms and host no more than 15 registered guests at one time; 11. The farm stay will provide overnight transient accommodations; 111. The farm stay may offer meals to overnight guests as an incidental, and not as the primary, function of the ranch; and iv. The ranch core area will have sufficient parking. Farm stay proposals that do not meet these conditions would require second-level approval. These recommendations, if approved in the current GMP amendment and EIS process, would allow for small changes to current operations for interested ranchers. The limits to the level of diversification would be set far below historic levels. The result would be a better example of the historic use meant to be preserved and protected by NPS and the State Historic Preservation Office. It would add to the enjoyment of the visiting public by demonstrating small examples of the true historic use and by allowing the public an opportunity to sample a "taste of the place". It would allow the seashore ranchers to be more sustainable by moving slightly away from a cow monoculture to more locally connected food system. This EIS should evaluate all of the wellstudied and well documented social, ecological and economic benefits of breaking up large agricultural monocultures into small scale, diversified, historically appropriate farm activities. 4. Operational Flexibility Currently, PRNS has allowed operational flexibility. Ranchers suggest that conditions should be similar for all lease/permit holders. Ranchers believe that PRNS should allow for all what it has allowed for some without a NEPA process. However, because PRNS decided to initiate this GMP A EIS, ranchers will provide comments to help inform and requests review by the process. 1) Uniformity. All ranchers should be treated equally: (a) same conditions; (b) same duration (c) same authorizations. 2) No NEPA Process. The following operational flexibility has been allowed for some ranchers without any NEPA process and should be allowed for all ranchers without a NEPA process. i. Harvest and storage

of on-farm planted and volunteer forage for feeding livestock during times of the year when little forage is available on ranch rangelands. This normal farm practice of tilling, planting and fertilizing most likely occurred on every ranch during the Shafter era and still occurs as a permitted use on several seashore ranches. 19 Traditionally and currently, harvested forage is stored on-farm as dry hay, silage and haylage. It is well known that in the project area most native coastal prairie grassland plant species have been replaced by non-native species, due to factors such as 150 years of active ranching, farming, planting of non-native annual and perennial pasture species, and accidental introduction of other non-native species brought in with livestock feed. Continuing the historic practice of storing feed will not likely result in a further loss of native plant species; rather, the opposite more likely could occur. Forage planting, on what has been determined as highly erodible soil, can be limited to no-till practices. There are many resource and economic benefits of allowing this historic practice to continue and it should be allowed on every ranch instead of only a few selective ranches. It is critical that the rancher or farmer be allowed to harvest forages when the plants are at the proper growth stage. Harvesting either too early or too late results in a dramatic loss in feed value. Restricting harvest timing would be a change to the environmental baseline and the adverse effects of such restrictions should be analyzed in this EIS. Harvesting and storage benefits include:

- a) Represent the true cultural heritage of the Shafter era ranching through the present time;
- b) Are already permitted uses within the seashore;
- c) Can be used effectively as range management tools to reduce non-native, invasive plants;
- d) Have been shown to be effective management tools to control and reduce the highly invasive velvet grass; *Holcus lanatus*;
- e) Reduce the carbon footprint of the project area by reducing the miles traveled by large trucks that would otherwise deliver purchased forage;
- f) Reduce feed costs for ranchers;
- g) Allow seashore ranchers and farmers to compete economically with farmers and ranchers outside of the project area;
- h) Improve seashore visitor experience by demonstrating an interesting, culturally appropriate and viable working landscape;
- i) Improve seashore visitor experience by reducing large livestock feed truck traffic.

Forage produced on a farm or ranch is a farm product - just as are milk, beef, chicken, eggs, pork, oysters, artichokes, peas and beans. Forage is a very traditional crop. Historically, including within the working landscapes of the planning area, ranchers and farmers produced feed crops and sold some of those crops to neighbors who needed the extra forage. PRNS has permitted such sales and off-farm use of forage crops in the same way it permits the sale of other farm products. The working landscape of the planning area is a traditional food producing region. Allowing the ranchers and farmers to work together to best utilize and protect the resources is vital to the longterm survival of the cultural resource PRNS is entrusted to protect. Ranchers suggest that the sale of any farm product, including forage, be allowed by PRNS for every rancher or farmer in the project area. Disallowing a rancher or farmer the ability to sell their farm products would be a burden not faced by agriculturists outside of the project area. An EIS should not be required for this management strategy to be immediately implemented planning area wide. 11.

Range management practices known to be effective for improving forage quality and quantity should be allowed for all ranchers and farmers in the planning area. For centuries, these coastal prairie grasslands have been carefully managed by humans interested in preserving the productivity of these rangelands. Careful management using tools including fire, mowing, grazing and planting rangeland forages have resulted in preserving the lush, productive and bio-diverse grasslands Congress meant to protect. PRNS contains perfect examples of how vital this rancher stewardship is. Where the NPS has allowed ranchers and farmers in the project area to do their jobs, using the above tools, the resource has been protected and is largely unchanged since the Shafter era as well as when Congress recognized the good stewardship of the Point Reyes ranchers. In essentially every place where NPS decided to end livestock grazing and evict the ranch families, the land stewardship ended. These locations without the ranchers' rangeland management have lost their historic grassland character. With the loss of livestock grazing, a change in both plant and animal species assemblages occurred. Where the NPS has chosen to end ranching and the rangeland stewardship provided by the ranchers, the ungulate carrying capacity has largely decreased. The loss of forage due to the lack of land stewardship and lack of range management in these former ranch lands have now contributed to the tule elk crisis. Invasive brush and weeds have overrun these areas to the point that seashore visitors have largely lost access. Ranchers do not believe that the objective of Congress was to allow these fantastic, sweeping, well managed, accessible grasslands to be lost. PRNS must continue to allow these scientifically proven tools, tools used for generations, to preserve our working, cultural landscapes. Ranchers suggests that PRNS treat ranchers and farmers equally and allow every rancher or farmer in the project area to do their jobs, preserving these precious landscapes using the best available range management tools - responsible tools used by land managers everywhere. Allowing ranchers to make range management decisions as they have for generations will help meet the objective stated by PRNS. An EIS should not be required for this management strategy to be immediately implemented project area wide. These are not changes to the historic rancher

stewardship of the planning area. NEPA is not necessary to continue status quo. m. Farm product diversification is fast becoming a necessity for the survival of small family farms everywhere. PRNS, in recognition of this fact, has already allowed some ranchers to diversify. Currently permitted for some ranches are small scale row crop operations, chicken operations, farm tours and interpretation and farm stays (ranch bed and breakfast operations). Additionally, diversification helps to achieve the NPS objective of preserving the Shafter era ranching and farming. Ranchers believe that PRNS could, and should, without an EIS, allow similar diversification opportunities for all interested ranchers and farmers in the project area so that all ranchers and farmers can improve their family businesses. iv. Lodging and public education on seashore ranches and farms are already permitted activities on some ranches and farms. This use should be allowed on any seashore ranch or farm if an operator requests permission. Ranchers understand that no environmental 21 review was required when PRNS gave approvals to some, so none should be necessary to issue other approvals. The visiting public is extremely interested in learning about the historic farming and ranching operations and activities. Allowing visiting families to experience the farm through organized tours and to actually stay at the farm are important visitor serving activities. Recently, thousands of visitors were provided tours and educational opportunities yearly at the oyster farm buildings located within the pastoral zone in the planning area. Here, the public learned about the history of PRNS, the value of cooperative conservation where both food production and natural resource conservation coexist in harmony. Now, with the eviction of the oyster farm, the public is denied an opportunity that existed since before PRNS was established. Allowing more seashore ranchers the ability to offer these kinds of services would help to compensate for that loss and would be a public benefit. It would also add to the viability of the ranch operation if other seashore ranching families were allowed to provide temporary lodging for individuals and families interested in an actual farm experience. Ranchers do not believe that all ranching families would be interested in obtaining permission to provide these services, but do believe the option should be open to all interested, to create equality among lease/permit holders. v. Best Management Practices (BMP) should not only be allowed by PRNS, they should be encouraged and incentivized by PRNS. All of these practices are implemented to improve environmental quality while preserving seashore ranchers' livelihoods. Added to the list of BMPs should be management intensive grazing (MIG) for those ranchers interested. MIG provides a multitude of rangeland, wetland and riparian zone benefits when planned and implemented properly. MIG is allowed on some seashore ranches and should be allowed for all interested ranchers in the planning area. Another emerging, yet crucial, BMP is managing the rangelands in a fashion proven to sequester carbon. By following standards set by the Marin Carbon Project² (MCP), and supported by peer reviewed science (Ryals and Silver 2013, Delonge et al 2013, Ryals et al 2015, Mayer et al 2018, Mayer and Silver 2018) the planning area rangelands could be engaged to offset GHG emissions from PRNS. PRNS should encourage the seashore ranchers interested in employing these MCP practices. The results of following the peer reviewed research verified MCP practices include: a) Increased soil organic matter; b) Increased soil and ecosystem carbon as a result of increased rangeland and pasture net primary productivity; c) A reduction in atmospheric CO₂ through enhanced photosynthetic capture and ecosystem sequestration; d) Increased soil water holding capacity; e) Improved water quality in storm water runoff; f) Reduced stormwater runoff; g) increased groundwater recharge; h) Improved forage production; and i) Increased resilience to changing climate conditions. There is potential under emerging local and state programs for ranchers to be monetarily compensated for the carbon they sequester (ACR 2014, Marin County Climate Action Plan Update 2015). PRNS should allow carbon credit and compensation to go to the seashore ranchers that have implemented the relevant BMPs, if this opportunity arises in the future. In the meantime, PRNS should consider compensating seashore ranchers, through rent reduction, for helping to offset the PRNS carbon footprint. This ecosystem service provided by the seashore ranchers could allow PRNS to become the example of how a unit of the NPS can become carbon neutral (a stated NPS policy), or even carbon negative- an essential part of the solution to climate change and ocean acidification (IPCC 2018; CARB 2018; Flint et al 2018, Mayer and Silver 2018) BMP approvals have languished at PRNS. PRNS staff have told ranchers that BMPs cannot be authorized due to the planning process instead of simply authorizing practices known to be good for the environment. One of the stumbling blocks is the unnecessary requirement imposed by PRNS to repeat a NEPA analysis that had already been accomplished by another federal agency. There is only one NEPA. Most of the BMP proposals brought to the PRNS by ranchers have been designed and analyzed by NRCS. NRCS is a federal agency that has significant, long term experience with the planning area. NRCS is authorized and fully capable of completing an appropriate and legally sufficient NEPA review. PRNS unnecessarily re-doing a NEPA process is unsettling to the ranchers. Ranchers suggest the GMPA include a provision that PRNS shall accept the NEPA review prepared by NRCS and the recommendations by NRCS on any BMP evaluated by NRCS. This agreement will result in: a) A more

streamlined process; b) BMPs being implemented more quickly and more often; c) More natural resources protection; d) More experienced individuals analyzing BMPs and making decisions; e) More rancher willingness to initiate a less onerous process to do the right thing for the environment; and f) Less taxpayer dollars wasted by avoiding unnecessary, duplicative review. 3) Same Flexibility as Family Farmers Outside Seashore. The following operational flexibility should be fully analyzed in the EIS, as this historically and culturally appropriate flexibility will provide the necessary options for the ranching families in the project area to remain viable. Agriculture is a dynamic land use. Changes in markets, climate, weather conditions, feed prices, consumer interest and new opportunities require flexibility in agricultural operations. Ranchers and farmers should be allowed the same flexibility as family farmers outside the planning area so that seashore ranchers can remain competitive in the local agricultural marketplace. The 23 flexibilities required to remain viable will not only meet the needs of the seashore ranchers, it will also contribute to the PRNS' stated objectives of preserving the historic, cultural landscape and improving visitor experience. Ranchers request that the following operational flexibilities be fully analyzed in the EIS. Due to the dynamic nature of agriculture, farm product diversification has been commonly practiced, not only during the Shafter era but also throughout time. Although some of these important practices are not currently occurring within the planning area, the flexibility to restore these practices both within and outside the ranch core is vital to the long-term sustainability of the family farms in the planning area.

1. Diversified livestock species. During the Shafter era, multiple livestock species existed in the project area. Hogs, sheep, goats, chickens, and turkeys all had their place on the farm. Ranchers now ask that this historic use be returned to the project area. Ranchers may choose to companion graze sheep with the cattle, others may choose to add pasture raised poultry - both good range management choices that will demonstrate the pastoral zone's cultural heritage while helping the economics of the ranches or farms. Other ranchers may choose to raise row crops for market and hogs to eat the spoiled vegetables while producing local food and reducing our carbon footprint. Ranchers suggest that PRNS allow seashore ranchers to diversify into additional livestock species. As the grassland resource is best suited for cattle, and a significant population of coyotes exists, it would be expected that the percentage of other livestock used on the ranches would be low, yet important. Ranchers and farmers should be allowed to choose what livestock or poultry species, within the historic context of the Shafter era to current, they raise on their farms and ranches. PRNS has allowed ranching operations to change from dairy to beef. PRNS has also recently allowed ranchers to convert their beef operations to dairy operations where a dairy previously existed. Ranchers applaud this flexibility and expect that other ranchers will be allowed the same options and operational flexibility into the future. Recently, PRNS has utilized goats within PRNS to help manage invasive brush within the pastoral zone. Ranchers are asking for the same kind of diversification flexibility on the ranch lands within the pastoral zone and GGNRA agricultural lands, outside of the ranch core LMU.

11. Diversified crop species. During the Shafter era, the ranches and farms were necessarily diversified to fit into a local food system. Many different crops were grown both for feeding the large staff on these diversified farms and ranches and for sale to the public. Thousands of acres of the planning area were under cultivation growing many different crop species. During the Shafter era and after, Point Reyes became the "artichoke capital" of California. Today, reminiscent of the Shafter era, vast fields that once grew artichokes still have the raised beds and furrows created by the farmers. Presently, thousands of crop acres in the planning area produce only forage for cattle. Only a tiny portion of the planning area remains in traditional row crop or traditional crop species field crop production. Ranchers know the history of their ranches or farms, know their soils, know their water availability, know what crops can be dry farmed and know where to find assistance in recovering small scale crop production within the project area. Ranchers suggest that this EIS consider allowing seashore ranchers to diversify their family farms by adding small scale crop production, with a selection of crop species appropriate and within historic context of the Shafter era to current time. It is unlikely that all ranchers will choose to 24 diversify into crop production, yet it is vitally important that the choice is available. To avoid the unlikely event that a rancher would like to plant too many acres, ranchers suggests that row crop production be limited to no more than 10% of the total farm or ranch acreage. This allowance, with the 10% cap, will not only allow the seashore ranchers to remain competitive economically, it will contribute to the PRNS objective of preserving the historic cultural resource. It will also benefit the gateway communities surrounding the project area by allowing seashore ranchers to once again be a lively and important part of the local food system and more directly influence the local economy. Allowing the recovery of the historic crop production will also help to meet the PRNS stated objective to reduce its overall I carbon footprint.

111. Grazing strategies need to be flexible. Much of the planning area has been continuously grazed since livestock were introduced in the 1850s. Rangeland ecologists and other scientists have shown prescribed grazing systems can be more effective in preserving native plant species, preserving and sequestering carbon, reducing non-native

invasive plant species, reducing impacts to wetlands and riparian areas, reducing internal parasite infestation and increasing forage production. Ranchers have many resources available, including the Marin County Ag Commissioner, the NRCS, and the University of California Cooperative Extension office (UCCE) to help them choose and implement new grazing techniques that further the dual goals of resource conservation and increased ranch profitability. To implement grazing practices that would result in improved rangeland conservation often requires additional fencing and water sources so that livestock can be managed and moved appropriately in a system that meets explicit resource and economic goals. PRNS has allowed some ranchers to improve water distribution systems and add fencing to achieve these goals. Ranchers suggest that PRNS allow all ranchers to use these appropriate tools and techniques to improve rangeland conservation and productivity. Ranchers believe that any temporary negative impacts of placing pipelines, water troughs or fence posts are far outweighed by the long-term improvements to the grassland and wetland ecology. Ranchers should be required to provide evidence that they have consulted with a certified rangeland ecologist to create a grazing plan. Ranchers should also be required to provide public access through any new fences that cross PRNS established trails. Ranchers believe that allowing all ranchers to implement these conservation practices when requested would further the PRNS objectives to preserve the open grasslands and pastoral character of the the planning area.

1v. Remove maximum stocking rates and stocking densities currently imposed on some, but not all, ranchers and farmers within the planning area and use Residual Dry Matter (RDM) and other resource monitoring tools to ensure that ranchers are managing responsibly. There is no known basis for, or value in, the limits placed on livestock numbers or animal unit months (AUM) on some of the ranches. There is also no justification for the vastly different livestock and AUM restrictions imposed upon similar ranches, or for the fact that only some ranches have no maximum AUM use limits. Rangelands are properly managed by understanding the resource and setting resource management goals, including ROM. Stocking rates must be adjusted to compensate for annual weather variations, grazing regime adjustments, pasture improvements through good rangeland stewardship and climate change effects to achieve the targeted RDM and other resource goals. Set stocking rate and stocking density restrictions are antithetical to 25 collaborative, adaptive, resource-based rangeland management. Simply counting cows and alleging violations by any rancher exceeding an arbitrary number, even when excess forage remains, serves no purpose. Arbitrary cow limits fundamentally discourage good rangeland stewardship. If a rancher is restricted to a low number of AUMs without reference to exotic weed management, or soil carbon consideration, that rancher would have little incentive to improve the resource or to work to sequester carbon. By removing limits on AUMs or maximum livestock headcounts, a rancher is incentivized to improve land stewardship in order to benefit from the increase in carrying capacity. Lifting these unequal, arbitrary and unnecessary conditions and shifting the focus to resource conditions, such as RDM, will help to more readily achieve PRNS resource objectives. PRNS should allow the rancher with the experience on the land to decide how to manage the livestock density on the rangelands while meeting PRNS ROM and other resource goals. Larger carrying capacity is usually related to good pasture and range management. Ranchers increasing soil and forage health should not be penalized by PRNS charging more rent for increasing rangeland carrying capacity. This, again, could discourage good stewardship. This EIS should consider charging seashore ranchers, into the future, the same total price for forage consumption that they are currently paying. This could serve two purposes: 1) all ranchers would be incentivized to improve the health of the rangeland resource because it will increase carry capacity for no extra fee to PRNS; and, 2) ranchers will be more likely to be able to help PRNS to meet resource conservation objectives. This would also be a small way to reward good land stewards for the ecosystem services they and their grazing livestock provide the PRNS and the public.

v. Family succession plans should be included in PRNS' leases/permits. In recent years, PRNS evicted the Horick family, a multi-generational seashore ranching family, after the permit/leaseholder (Vivian Horick) was unexpectedly killed in an auto accident. Even though the ranch in question, the D Ranch, is located within the pastoral zone (a zone set aside by Congress to continue the traditional ranching at Point Reyes), PRNS has disallowed much of the ranch, and most of its buildings, to continue in agriculture. After evicting the Horicks, PRNS unilaterally decided to completely change the use--and the intensity of use--of a significant portion of this agricultural land without initiating a public process pursuant to NEPA. Instead of allowing ranching to continue on all of the D Ranch as decreed by Congress, and thus expected by the public, PRNS--without the agreement or participation of the public--allowed tu le elk to proliferate on this ranch located within the pastoral zone. This significant federal action clearly had the potential for adverse impacts to the human environment and those impacts should have been studied before the action was taken. This federal action has resulted in a loss of agricultural production on this historic ranch. Ranchers believe that if a succession plan was in place at the time of Vivian Horick's death, the same historic family would still be ranching

on their historic family ranch that they built with their own hands in the late 1800s and the tule elk may not have proliferated on the D ranch and the surrounding ranches. The long-term viability of the small family farms located in the planning area depends on good succession planning. PRNS should require that every seashore farmer or rancher has a plan that describes who will succeed the current lease/permit holder. This would avoid problems that will invariably arise if a permit/leaseholder unexpectedly dies or if a current permit/leaseholder leaves or is evicted by PRNS. The required planning process should also include provisions for who may assume the agricultural permit/lease if a current ranching family decides it does not want to continue its family farming tradition. It is of critical importance to ranchers that some former ranches be evaluated in this EIS for the restoration of the historic agricultural production and that no other ranches be removed from agricultural production. A clear planning process can help to avoid future loss of historic agriculture in the planning area. This is an example of where an Ag Advisory Committee or non-profit made up of local experts, managers and community members, as in Cuyahoga Valley, could recognize the value of the existing multi-generational families' experience and connection to the land in choosing who will be selected to operate the ranches within the working landscapes. This EIS should also analyze all the adverse effects that would result from a loss of even one more ranch or farm within the planning area, including: a) Loss of public trust in NPS and PRNS; b) Damage to the regional agricultural infrastructure by reducing critical mass to support; (1) Processors of farm products; (2) Distributors of farm products; (3) Vendors of farm equipment and machinery; (4) Consultants, and (5) Veterinarians. c) Setting a precedent for anti-agriculture groups and individuals to use to continue to attempt to remove agriculture from the planning area. v1. On-farm value-added opportunities should be considered in this EIS. In some cases, existing buildings could be used for on-farm processing. Some small-scale processing may require new structures. PRNS has recently authorized and permitted tens of thousands of square feet of new building space on seashore dairies. Ranchers applaud PRNS for allowing these important buildings to be constructed in the coastal zone as it has allowed those dairies to reduce water quality impacts caused by the dairy livestock, and to increase the profitability of the dairy. In the region surrounding the planning area, both the Marin Countywide plan and the local coastal plan allow for new structures to house value added facilities, because those jurisdictions understand the need to allow these sorts of activities to keep agriculture in Marin viable. The planning area is in Marin and the seashore ranchers have the same needs as those outside the planning area. The Shafter era agriculture within the project area was replete with almost every kind of on-farm processing. On the ranches and farms, there were vegetable packing facilities, butter churning facilities, cheese making facilities, slaughterhouses, butchering and packing facilities--all a part of a thriving, local food system--the kind of local food system that our nation is recognizing we ought to return to and to embrace going forward (and a system that the European nations, and much of the world, have never lost sight of). The infrastructure to accommodate these kinds of activities no longer exists on many of the seashore ranches. This EIS should not only consider allowing these sorts of uses within existing ranch structures, but also contemplate the effects of replacing buildings and infrastructure lost over time, or that have not previously existed. Ranchers do not expect all seashore ranchers will be interested in using an existing structure, or in building a new structure, to commence on-farm processing. However, for those ranchers that are interested, PRNS should give permission to do so. Allowing value added on-farm processing would: a) Help to achieve the objective of preserving the true historic cultural resource; b) Improve the economics and profitability of seashore ranchers; c) Allow interested seashore ranchers to become an important part of the local food system by moving away from a monoculture commodity based agricultural system and back to a diversified locally focused system; d) Promote opportunities for young ranching family members to become excited about the farm and allow for a viable future; e) Be consistent with PRNS policy to allow on-farm processing as it permitted the oyster farm to process its farm products for nearly 50 years; f) Allow all ranchers and farmers interested in on-farm processing to grow, process, pack and ship farm products (simply treating each permit/lease holder equally); g) Improve the gateway community's access to wholesome, locally produced food; h) Reduce the trend of small family farms ceasing operations due to the inability to compete with large operations on commodity priced products; i) Recover the on-farm processing opportunities that the visiting public formerly enjoyed at the oyster farm. This EIS must also evaluate the benefits of allowing not only the products grown on a particular ranch unit for on-farm processing but also for products produced on other ranches and farms in the planning area. The benefits of allowing additional seashore farm product processing include; a) Opportunities for collaboration between seashore ranchers; b) More accurate representation of the historic agriculture and agricultural product processing in the planning area; c) Reduction of the overall number of on-farm processing facilities; and d) Allowance for more expensive processing to be accomplished than a single seashore rancher could justify on a one ranch basis. v11. On-farm retail sales should be allowed on all ranches and farms within the

planning area. PRNS had consistently, since the formation of PRNS, allowed on-farm sales at the oyster farm, located within the pastoral zone within the planning area, until the oyster farm was recently closed. To create uniformity and equality, other interested seashore ranchers should also be allowed to sell their products at their farms. This EIS should assess the benefits of on-farm sales, including: a) New visiting public opportunities to taste and take home the products of the PRNS regional, historic working landscapes; 28 • b) New marketing opportunities for vegetables and value-added products; c) New educational opportunities for the visiting public and seashore ranching families to connect; d) Improved economic opportunities for seashore ranchers; e) Renewed opportunities for seashore ranching family members to become/stay involved in the family farm; and f) Recovery of the public service opportunity recently lost at the oyster farm - the historic on-farm sales within the planning area. Many seashore visitors enjoyed purchasing not only oysters, but also grass fed, organic beef, flowers, artichokes and other vegetables grown within the planning area. Allowing small retail outlets, or "farm stands" on ranches within the planning area to sell more than what is simply grown on that specific farm or ranch will result in the following benefits: a) Allow for collaboration between ranchers; b) Reduce the number of on-farm sales locations; c) Add variety to the individual farm stands, thereby improving visitor experience; and d) Provide consistency, uniformity and fairness to all seashore ranching and farming families with permits/leases. Ranchers fully support equal treatment and expect that opportunities given to one permit/lease holder will be offered to all other lease/permit holders. Ranchers do not expect all seashore ranchers will be interested in initiating on-farm sales, but those interested should be given the permit. This EIS must consider on-farm sales locations sited in temporary structures, permanent existing structures and new structures. Given the extreme weather conditions in most of the planning area, a safe, indoor facility is most likely the most appropriate location.

viii. D Ranch solution. PRNS evicted the Horick family in late 1999. The D Ranch remains an historic piece of the "agricultural property" located within the pastoral zone. Ranchers are unaware of a NEPA process undertaken at the time to consider the effects of changing its use - to remove agriculture from a significant portion of the D Ranch located within the congressionally designated pastoral zone specifically authorized for continued agricultural use. Resuming the historic agricultural activities on the entire D Ranch is an important step in preserving this historic working landscape as a complete unit. Since PRNS paused the historic use of agriculture in the pastoral zone, apparently without the required public process or environmental review under NEPA, ranchers presume that resuming the designated, historic land use will also not trigger a NEPA review. Ranchers request that PRNS issue permits for the building complex and the entirety of the rangeland at the D Ranch. This would go a long way to reassure the public that the Department of Interior 29 and PRNS are truly committed to upholding the intent of Congress to preserve agriculture in the planning area.

ix. New worker housing and upgrading existing worker housing where necessary should be allowed and encouraged by PRNS. As agriculture changes, staffing levels need to change as well. For example, a rancher currently producing only beef may need to restore some of the agricultural diversity that once occurred on the ranch - perhaps 15 acres of row crops - to stay in business. This recovery of the historic agriculture would most certainly require that additional farm workers also return to the landscape. Over the decades, PRNS has allowed ranchers to add housing on the ranches and farms without initiating a NEPA process. Given this fact, an EIS would not appear to be necessary to allow other interested ranchers and farmers to add housing. Nevertheless, ranchers would like the GMPA to expressly authorize additional worker housing on the ranches if the rancher can demonstrate the need. All new housing could be limited to housing necessary for rancher family members and required farm workers. Benefits of new housing to meet the needs of the ranchers include: a) Reduced traffic on seashore access roads; b) Reduced GHG production from commute traffic; c) Reduced danger to employees expected to commute during odd hours. For example, an employee may need to arrive at 2:00AM to be at the ranch in time for milking. This condition could lead to more hazards, including hazards caused by, and injury to nocturnal wildlife on roadways; d) Continued Shafter-era agriculture where ranch workers live and work on the ranch; e) Increases affordable housing in West Marin county, rather than exacerbating the affordable-housing shortage; f) Improved seashore ranchers and farmers competition with ranchers and farmers outside the seashore for skilled employees; g) Reduced adverse effects to the rancher, the livestock and or the employee if an employee meets difficulty during commute and is late, or misses work; h) Improved living conditions and lifestyle of the ranch workers if they do not have to commute from long distances; and i) Increased attendance and revenues for our local Shoreline Unified School District.

B. Management of Tule Elk on Ranch lands In 1998, an environmental assessment, pursuant to NEPA, was undertaken by PRNS to consider alternatives for management of the overpopulated elk on Tomales Point that were known carriers of the dreaded John's disease, a serious disease transmittable to cattle. The plan alternative that would have allowed the tule elk to roam on the ranchlands in the pastoral zone was rejected by the

public. 30 The 1998 Elk Management Plan includes a map that clearly describes, with a distinct line around the perimeter, the 18,000-acre designated elk range. The 1998 plan states that the PRNS would establish the free ranging elk herd "within" those 18,000 acres. This range intended for the elk does not include any ranch land and is fully located within the Limantour wilderness area. The current GMP A materials include a similar map showing where the elk currently exist, but now excludes the designated elk range. This is misleading. The public may not know that the elk have been allowed to proliferate outside the limits of the designated elk range found in the current elk management plan. By failing to include the designated elk range in the map, the public has not been properly informed to provide meaningful comments on the GMPA EIS. The PRNS, its contractors and its experts must consider the fact that the public was given this misleading map prior to commenting on the GMPA EIS. This fact is especially troubling because this serious omission has been previously pointed out to the NEPA team in previous scoping (the CRMP and the first GMPA scoping), and yet this misleading error persists. The 1998 Elk Management Plan, the current, operative plan, recognizes the fact that the introduced tule elk population can explode without management and has the potential to adversely affect seashore resources, including cattle. The plan is clear that PRNS is to manage the elk so that they do not harm any other permitted use within the seashore. To manage the expected elk proliferation and to avoid harm to other permitted uses, the plan allows the PRNS and CDFW to use capture and relocation of wayward elk, contraception of elk, and even lethal culling. For the first several years following the 1998 public process and plan approval, PRNS utilized all of these approved tools to manage the elk and kept them off the pastoral zone. During these years there was no controversy because everyone interpreted the plan the same way. The contraception program appeared to be hugely successful (see Science & Conservation Center letter, Attachment A). When a rogue elk appeared on a ranch, the rancher called the seashore staff and the animal was tranquilized and brought back to the designated elk range. In at least one case, a repeat intruder was shot and killed by PRNS. The PRNS was quite clear, and understood its responsibility when it looked back in the 2001 PRNS publication (see "Point Reyes National Seashore 2001 Year in Review", attachment BJ where PRNS stated "Since their release, the new herd has been carefully monitored to ensure animals remain within Seashore boundaries, do not interfere with cattle ranches within the park and are not shedding the organism that causes Johne 's disease. " (emphasis added). Unfortunately, sometime around 2002, PRNS ceased management of the tule elk. Contraception ceased. Relocation ceased. Culling ceased. At the time tule elk management apparently ended, PRNS began to allow tule elk to proliferate in the pastoral zone and harm the ranchers- --the very permitted use the 1998 Elk Management Plan set out to protect. Since PRNS abandoned its management of tule elk and allowed the elk to occupy and multiply in the pastoral zone, ranchers have made dozens of attempts to inform the seashore staff and identify the devastation caused by the tule elk near Drakes Beach and near the Drakes Estero Trail. Additionally, ranchers have made repeated requests to have the elk managed per the elk management plan as PRNS did for the first few years following the public NEPA process and plan approval in 1998. The unauthorized elk herd on the pastoral zone is growing at a rate of 12% per year, a full doubling of population every 6 years. The damage caused by the elk is now catastrophic. Ranchers believe that this situation is now an emergency- --a crisis that must be addressed immediately. Ranchers strongly oppose the new PRNS efforts to enhance tule elk habitat within the pastoral zone. These PRNS efforts, including the creation of new water sources, are changing the use of an area within the pastoral zone, without the required public process necessary to make such dramatic changes. The PRNS has chosen to create an elk attractant within the pastoral zone, an area that Congress intended would be used for ranching in the working landscapes. Ranchers are concerned that PRNS has now chosen, without a public process, to create and improve elk habitat in the pastoral zone, rather than improving the habitat in the designated elk range where the elk belong. This EIS must not be used to validate improper management practices just because PRNS has unilaterally initiated those practices outside of, and in conflict with, the current elk management plan and without public involvement. This EIS must fully evaluate the benefits of habitat enhancement within the elk ranges and the adverse effects to the planning area if elk habitat enhancements continue within the ranch lands. Ranchers have heard PRNS staff claim that PRNS cannot improve elk habitat within the designated elk range because the area set aside for elk is located within wilderness areas. Ranchers and the public are fully aware that PRNS finds ways to do work to improve areas within wilderness status areas. We see heavy equipment rebuilding and clearing trails, we see bulldozers and huge excavators working in wilderness to remove beach grass from dunes. If PRNS can find ways to work in wilderness to improve plant species and habitat in one place at Point Reyes, why not another? As described elsewhere in these scoping comments, coastal prairie grasslands need management or will be lost. Unsurprisingly, elk habitat in the wilderness areas is being lost due to lack of management. This EIS should fully evaluate a plan whereby PRNS would have the authority and responsibility to improve and maintain sufficient elk habitat within

the designated elk ranges. Furthermore, this EIS should continue to allow PRNS to maintain the elk population within the carrying capacity of the designated wilderness area. Ranchers strongly oppose the current elk hazing by PRNS. This EIS should evaluate the adverse effects to the elk, the ranchers' fences, the ranchers' water systems, the ranchers' livestock and the continuous cost to the taxpayer. Ranchers are on the ground continuously watching the PRNS staff attempting to haze elk away from rancher's pastures. It is not an effective tool. Elk immediately return to the ranchers' pastures. Furthermore, elk is a wildlife species, not a domesticated animal species. Ranchers are watching the continuous human disturbance of tule elk - a treatment that appears to be inhumane. If the elk were effectively separate from the ranch lands, this constant, unnatural treatment of wildlife would end. This EIS must evaluate whether the PRNS has the authority to immediately resume the management of the tule elk, using the tools already authorized in a previous EA and current operative elk management plan. These are the same tools PRNS previously used pursuant to the current plan to ensure the elk "do not interfere with cattle ranches within the park and are not shedding the organism that causes Johnne's disease" that can be transmitted from elk to cattle. Ranchers believes that the only solution that will meet the objectives of this plan, and to manage for effective separation as stated in Rep. Huffman's legislation, HR 6687, is to build a fence on the boundary between the planning area ranch land and the wilderness area that contains, in its entirety, the designated tule elk range. The free ranging elk could continue to thrive, free ranging in the area where they were intended to be and the ranchers could get back to providing stewardship

for the resources and food for the community. This EIS should fully consider the adverse effects of allowing the newly introduced elk to remain on the pastoral zone, including: i. Ongoing harm to ranchers and their livelihoods; 11. Ongoing risk of injury, disease or death to cattle; m. Ongoing risk of disease to tule elk from cattle; 1v. Increased taxpayer expense to manage elk within a ranching zone; and v. Ongoing conflict with congressionally established, permitted ranches. Ranchers have proposed a location for the new elk fence (see "Elk Fence Considerations" Attachment C). The ranchers that proposed this location know this terrain better than anyone. The fence could be located in an area accessible for construction and out of sight to most of the visiting public. This fence would not fence-in or enclose the elk, it would simply serve the purpose of keeping the elk off the permitted ranch lands. The one-time expense of building the fence would: i. Eliminate elk caused conflicts with ranching; ii. Reduce disease transfer; 111. Eliminate the disturbance of wildlife through PRNS hazing; iv. Still allow elk viewing opportunities for the visiting public; v. Allow elk to remain in a more natural habitat; vi. Be respectful and responsive to Congressman Huffman's direction in HR 6687; vii. Save dollars over time; and viii. Would result in maintaining elk within the geographical region identified in the 1998 Elk Management Plan and EA - C. Floodplains, Wetlands, Riparian Areas Ranchers are unaware of any new ranching or farming activities requested within floodplains, wetlands or riparian areas. The ranching and farming activities that may be occurring within these areas have been part of the environmental baseline for approximately 150 years. Ranchers, in collaboration with NPS, NRCS, RCD and others have made many modifications over the years to reduce impacts to these important areas. Ranchers commit to continuing its partnership with agencies and organizations with the goal of reducing negative environmental impacts to floodplains, wetlands and riparian areas. Any existing (current environmental baseline) effects should be excluded from this process. NEPA requires a federal agency to evaluate only new effects that have the potential of altering the status quo. NEPA requires a federal agency to analyze the effects of new activities on the human environment. Ranching and farming activities are a part of the environmental baseline. The status quo of continuing ranching should not be evaluated within this EIS process; it should be categorically excluded, pursuant to NEPA. Ranching, as is, is within the environmental baseline. Special status species or species of special concern analysis should be limited to new activities with a potential to have effects on the environmental baseline. This EIS should be limited in scope to the effects of new impacts anticipated from new development and changes from the status quo only. During analysis of potential impacts to species of special concern by new activities, the proposed alternative should be kept in mind. Using potential adverse impacts to special status species to block requested changes to the status quo, especially for activities allowed elsewhere in Marin County, would create further unfair disadvantage to seashore ranchers and undermine the plan. E. Health and Safety Standards for worker housing. The worker housing on the ranches and farms have health and safety standards that must be followed. PRNS and the United States Public Health Department (USPH), on an annual basis, inspect all worker housing on every historic ranch or farm located within the working landscapes of GGNRA and PRNS. PRNS and USPH then provide inspection reports to the ranchers and farmers that provide and maintain the housing. If the agencies find any health or safety non-compliance, they

require the rancher or farmer to correct the deficiency. This regulatory oversight seems to be appropriate in assuring health and safety standards are met for worker housing. F. Vegetation

- 1) Restoration of native prairie. It is widely recognized that most of the native plant species once found in the coastal prairie grasslands within the subject area have been replaced by nonnative species, either intentionally or accidentally, over the past 150 years of European-American land use. Ranchers believe that true restoration of native coastal prairie is only possible in rare locations within the ranch lands within the planning area. Generations of livestock grazing, exotic seed planting, tilling, crop production, imported feed with exotic plant seeds have all contributed to this shift. These practices, which have changed the landscape and the plant communities beginning 150 years ago, have continued shaping the landscape through the Shafter era and into the present. This EIS should study negative effects to the ranchers and their livelihoods if attempts to restore native plant species takes priority over the continuation of the normal ranch practices that have been part of the working landscapes from the Shafter era through the present time. Ranchers are willing to work with rangeland ecologists and certified rangeland managers to locate areas best suited for row crop production, forage crop production, rangeland planting, rangeland mowing to control invasive plant species, waterline placement, water trough placement, fence installations and other BMP implementations. Ranchers recognize that there are a few, rare locations where native vegetation dominates and areas where special status plant species exist. Ranchers commits to continue working with NPS, NRCS and others to carefully and appropriately manage these sensitive areas. These rare areas have been identified over the years and ranchers and farmers 34 already cooperate with agencies to help preserve these resources. The EIS team should evaluate how the current conservation framework and its restrictions, unchanged, could undermine a PRNS rancher working relationship built over time to address proper siting of ranching activities. Ranchers observe that the most serious threat to the native coastal prairie grassland, defined by Merriam Webster Dictionary as "farmland occupied chiefly by forage plants and especially grasses" (emphasis added) is the removal of ranches and farms that formerly provided the necessary stewardship. In these areas where ranching has been removed and that have been renamed "wilderness, a tragic shift has occurred or is occurring. Instead of the traditional, managed grassland, these areas have become a brush covered landscape. One example can be found at the Limantour wilderness. This area has now become a landscape that has facilitated catastrophic fires resulting in private property devastation at the wildland-urban interface. It is a landscape that no longer supports the same assemblage of wildlife species and native coastal prairie grasslands that it once supported. It is a landscape that does not resemble what the NPS is asking ranchers to accomplish within the planning area. Vegetation change on this unmanaged former grassland likely contributed to the 24% loss of tule elk in the Limantour elk range during a recent drought. Ranchers suggest that NPS allow the historic ranchers to continue the same rangeland stewardship practices, working with the agencies and experts, as they have for generations. Ranchers also recommend that NPS focus their rangeland restoration efforts on the most critical areas - the Limantour and Tomales Point elk ranges. Prescribed livestock grazing in collaboration with seashore ranchers under a stewardship contract arrangement could facilitate this grassland restoration process. This EIS should also consider the benefits that could be provided to coastal prairie grassland and public safety by properly managed livestock grazing on ranches within the planning area where grazing has recently ceased. These were agricultural lands when PRNS and GGNRA were established. These ranch lands where grazing has temporarily ceased now contain huge amounts of fire fuel and are located near the urban interface. Removing ranching and grazing could lead to catastrophic fire. Returning rancher stewardship to these coastal prairie livestock pastures at no cost to PRNS PRNS could collect SUP fees under a stewardship-contract type of arrangement) are likely to further the NPS goal to preserve the coastal prairie grasslands. Ranchers support the applications by the historic families or other interested ranchers to resume historic grazing operations on these ranch lands in desperate need of fuel reduction and rangeland management.
- 2) Dunes. The sand dunes located within the pastoral zone have long played a role in the cultural working landscapes of the Shafter era agriculture through to the present. This process may now work to improve the earlier NEPA process undertaken by PRNS. The GMPA is the proper context to evaluate the effects of the dune management. The sand dunes have always been a threat due to the highly erodible nature of the sand. High winds can easily result in significant sand movement, potentially covering valuable pastureland. The sand dunes have been managed by European-Americans for a long time. To reduce the shifting sand, vegetation has been planted to hold the sand in place. After establishment of PRNS, NPS also planted beach grasses and ice plant to hold back the blowing sand. Recently, PRNS, over the objection of ranchers, has initiated projects to remove the vegetation that was planted to hold the sand in place. Erosion control measures implemented by PRNS have 35 failed. The result has been exactly what ranchers feared. The moving sand has covered valuable pasture land, fences and endangered plant species, including the endangered grass species

Sonoma *Alopecurus* as well as the rare habitat for the endangered Myrtle's Silverspot Butterfly. Ranchers ask that this EIS properly consider the dunes as part of the cultural working landscape with nonnative plant species. This EIS should consider the adverse effects of removing the non-native vegetation from the dunes. It should also consider the beneficial effects of re-planting a native vegetation that could perform the same function of holding back the blowing sand that the nonnative vegetation was providing. 3) Non-native species management. Ranchers are committed to work with rangeland managers, NPS, NRCS, UCCE, Marin County Ag Commissioner and others to employ best management practices to help manage non-native, invasive plant species. Ranchers request that this EIS study the well-established benefits of using livestock grazing, multi-species grazing, MIG grazing, tilling, mowing, mechanical harvesting, fencing and other agricultural practices to control and manage non-native invasive plants. PRNS currently uses herbicides for the control of non-native invasive plants within the planning area. Ranchers request that the EIS study the benefits of allowing ranchers, in certain circumstances, to use herbicides to control invasive weeds. On occasion, invasive weeds may begin to invade areas inaccessible to mechanical control. Sometimes the invasive is not palatable to cattle. In these circumstances, ranchers believe that the use of an herbicide may have less adverse environmental impact than the rampant proliferation a non-native invasive weed may have. Although it may be only on rare occasions, ranchers ask that PRNS authorize the use of herbicides when necessary. 4) Brush management. Both native and non-native brush species require management in coastal prairie grasslands. Without brush control, the grasslands will likely become lost to brush invasion. This loss of native habitat due to brush invasion has already been demonstrated at PRNS in areas where NPS has removed ranching. Coastal prairie grasslands require management. For hundreds of years, or perhaps millennia, humans have facilitated the persistence of this important ecosystem, through fire, and, more recently, through grazing and mowing. Ranchers request that this EIS fully evaluate the fact that brush management has occurred on coastal prairies for all recorded history, a fact that has also been identified through anthropological review. This EIS should also consider the ecosystem benefit of preserving the grassland habitat by allowing ranchers to control invasive brush on their pasture lands. Ranchers are committed to work with the agencies to identify the best timing and methods for brush removal to reduce adverse effects to other species. Rangeland ecologists and watershed managers understand that nutrients and sediments are often better controlled and better treated by grass covered soil than brush covered soil. The bare soils often found in the shade of dense invasive brush allow water to travel more quickly, with more erosive energy and with less absorption and less plant nutrient uptake. Ranchers request that the EIS study the water quality benefits of allowing ranchers to continue the tradition of brush control as well as the adverse effect of water quality degradation that could result from prohibition of brush control. 5) Fire regime. Coastal prairie grasslands require disturbance and invasive species control. Native Americans used fire as a tool to manage the planning area before European-Americans arrived. The record tells us that the Point Reyes peninsula and surrounding rangelands were 36 covered with lush grasses and full of wildlife - largely due to regular anthropogenic burning. European-Americans continued to employ fire as a rangeland tool. Most current ranchers used fire extensively for brush control on these ranches until the NPS stopped the use of fire as a range management tool. Ranchers believe that fire is an appropriate tool to control brush in certain circumstances and, because of the risk of wildfires, not in other circumstances. Over the past several years, PRNS has successfully used fire as a tool to manage vegetation. Ranchers ask for the same kind of flexibility on the ranch lands when appropriate. The cessation of use of fire and grazing has led to an increase in fire fuel loads, especially in the Olema Valley. Grazing can reduce fire fuel loads in these areas. Ranchers request that the EIS study the benefits of reintroducing grazing to these areas and how this could reduce the risk of catastrophic fires causing harm to the resource, personal property and the potential personal injury or death resulting from avoidable wildfires. Ranchers suggest that in wilderness areas, where almost all native grassland and the species assemblages it supports have been largely lost (especially due to unmanaged brush invasion), fire be considered as a restoration tool. We note that the PRNS itself is using fire as a vegetation management tool in other areas. Ranchers ask that this EIS also consider the benefits to the human environment resulting from fire fuel reduction and minimizing the risk of more PRNS catastrophic wildfires that prescribed burning could provide. This EIS should also analyze the increased wildlife carrying capacity, including that of the tule elk, that would result if PRNS began to manage the now threatened coastal prairie grasslands in the wilderness areas. G. Visitor Use/Recreation 1)

Interpretive/educational programs regarding historic and contemporary ranching operations. Historically and recently, interpretive and visitor serving programs within the planning area were provided by Drakes Bay Oyster Farm. Approximately 50,000 visitors per year enjoyed farm tours as well as other interpretive and educational services at the oyster farm. The oyster farm educational services were part of the curriculum of many elementary schools, high schools and colleges. At the oyster farm, the visiting public was able to learn about the history of the

working landscapes and the responsibility NPS and the ranchers have to preserve and protect the working landscapes as an important part of our cultural heritage. The interpretive services provided by the oyster farm, although now gone, are an important part of the current GMP A baseline. Allowing other ranchers to provide similar opportunities would simply be a baseline activity allowing status quo to continue. Public education has always been a central interest to ranchers. Ranchers believe that PRNS does not currently provide any meaningful interpretation of the ranching and farming within PRNS or GGNRA. Ranchers worked for years to arrive at one temporary poster that would be periodically displayed at the PRNS headquarters visitor center. Ranchers believe that the visiting public deserves the interpretation and educational programs once provided by the historic oyster farm and that those programs should be allowed to continue both on-farm and at the PRNS visitor center. This EIS should also consider the fact that people passionate about agriculture may not choose NPS for their career. This EIS should evaluate the adverse effects of NPS employees, generally without training or experience in agriculture, providing the only agricultural interpretive services. 37 . 2) Access. Ranchers are always willing to cooperate with preserving existing public access through the ranch and farm lands in the planning area. Any contemplated changes to the current access baseline should be evaluated in this EIS. New public access through ranch land usually results in more work for the rancher. These challenges could include a need for new gates, gates being left open, prohibition on new important fencing or other BMPs, parking challenges, disturbance to livestock and wildlife disturbance. This EIS should also analyze the fact that new access could also lead to potential risk to the visiting public. New public access through historic livestock pastures could disrupt normal animal behavior. Changes in stimuli and disturbance can lead to increased anxiety and, in some instances, aggression in domestic livestock. This EIS should also evaluate the benefits of NPS providing indemnification to the ranchers in case of injury to members of the public caused by livestock. Ranchers believe that this would be reasonable because it is NPS that is encouraging public access through ranchers' livestock, not the ranchers. 3) Recreational opportunities. Ranchers are fully aware of the public's support of continued agriculture in the planning area and the public's desire to know more, and to experience more about the historic working landscapes. The following are two examples of recreational opportunities recently allowed in the seashore within the planning area. A NEPA process was not initiated to allow these activities to be conducted in the past, therefore it should not be required now. Ranchers believe that simple fairness would suggest that if others are interested in similar activities, PRNS should permit those as well. The oyster farm was the only farm organized and permitted to offer regular farm tours. The oyster farm did not charge any fee for the tours. This EIS should consider the effects on the human environment of allowing other ranches and farms to provide farm tours if requested. If NPS would allow other ranchers and farmers to offer tours at a fee, the public would benefit from the recreational value and the rancher would benefit from the income generated. Today, there is only one ranching family allowed to have farmstays. Overnight stays on other working ranches within the project area would offer more recreational opportunities for visiting families interested in experiencing the working landscape culture with the families that have been a part of the landscape and history for generations. This EIS should evaluate the public benefit of the ranchers offering daytime farm work experiences and overnight on-farm accommodations as well as the benefit to the ranching family by allowing additional farm income. H. Planning and Protection of Ranch Complexes 1) Define areas for ranch infrastructure improvements. PRNS has recently allowed large expansions of ranch infrastructure well outside of the general cluster of buildings or previously improved areas. On one ranch in the pastoral zone, PRNS facilitated the permitting and authorization, including permit from the California Coastal Commission, for the construction of two large barns for animal housing and a new manure pit for additional waste storage. This new development outside of the building complex was necessary to improve water quality and the profitability of the dairy. Even though this project expanded the previous boundaries of the ranch complex, the expansion area represents only a small fraction of the ranch area. This EIS should 38 recognize the dynamic nature of agriculture within the planning area and recognize the benefit of remaining flexible to add ranch infrastructure outside of an existing building complex or an imaginary future complex limit, or "ranch core". This EIS should consider the adverse effects that could result if new ranch complex limits are established without the full understanding of what the future may bring. Ranchers support the notion that new building and development be situated within the existing ranch complex as possible. As in the above example, it is unlikely that any ranch or farm within the planning area could fit this extensive development within its current building complex. Without the approval of the new barns, this dairy may have been forced to close. Therefore, the same flexibility that was offered to that rancher should be offered to other ranches and farms as necessary. Should the new GMPA include a conservation framework with a ranch core LMU, the boundaries of this ranch core must include the flexibility for the thoughtful rebuilding of structures lost as well as modest expansions that may be necessary over time in a

continuing working landscape. 2) Define roles and responsibilities for maintenance of existing infrastructure. The roles and responsibilities for maintenance and repairs of existing infrastructure seem clearly defined in the SUPs issued to ranchers and farmers within the planning area. Nevertheless, PRNS has interpreted the permits differently over time. Over the years, ranchers have asked PRNS to adhere to the conditions in the permit and to interpret the conditions equally for each permit holder. This EIS should consider a new ranch lease document that everyone understands. Generally, ranchers accept the roles and responsibilities for maintenance and repair of existing infrastructure as agreed upon in the current SUPs and oppose the unequal performance of PRNS responsibilities under those permits. The permits require the ranchers and farmers to be fully responsible for cyclic maintenance including fencing, painting, water system maintenance, road maintenance and other items. The permits also state that the NPS is responsible for capital improvements. PRNS should be paying for major, long term infrastructure repairs. The common practice is that PRNS refuses to pay for capital improvements as set forth in the permits. Occasionally, however, PRNS has agreed to pay for capital improvements. One example is that requests for roof replacements with 30-year life expectancies are regularly denied, yet PRNS has recently paid for new roofs for one rancher. There are other examples of such unequal performance of PRNS responsibilities. The new ranch lease document should be clear to all parties. Ranchers are concerned that when rural land appraisals are completed by PRNS contractors, the appraisers are unaware that it is the rancher or farmer that has usually paid for capital improvements, not the NPS as the permits suggest. The resulting appraisal may be higher than if the appraiser knew the rancher is actually paying for capital improvements. If this EIS contemplates a change to the roles and responsibilities for maintenance and repairs of existing infrastructure, ranchers ask that they be informed of the desired changes. Ranchers commit to working collaboratively with PRNS on any appropriate changes to the current agreements. With or without changes that may or may not trigger NEPA, ranchers expect that full, fair and even implementation will be established throughout the planning area. I. Floodplains, Wetlands, Riparian Areas 1) Buffers for water quality protection. Ranchers have been working and will continue to work with NRCS, RCD and NPS to establish appropriate buffers for sensitive riparian areas. The 39 proposed 900 acres of resource protection buffers should be carefully and individually analyzed in this EIS - not simply unilaterally added. Directly affected ranchers should be included in the buffer discussion. Generally, ranchers agree with most of the proposed buffers and request to be involved in the discussion before buffers are decided upon. 2) Habitat enhancement. Ranchers have been working and will continue to work with NRCS, RCD and NPS to enhance habitat in sensitive riparian and wetland areas. Ranchers are not aware of any PRNS plan to change the existing PRNS/rancher collaborations. If NPS has a proposal to change the existing baseline with new requirements or restrictions outside the new resource protection buffers it should make that proposal available to the public so that meaningful comments can be given. If NPS does not have a proposal to change the status quo, ranchers will continue to collaborate with the agencies to enhance sensitive habitats and no evaluation is necessary in this EIS. VII. CONCLUSION Many serious social, cultural, economic and environmental issues have been identified to be reviewed in this process. Some of these issues have already been analyzed by previous NEPA processes. From these processes, management plans have been approved. Ranchers recognize that PRNS follows a plan in some cases and chooses not to follow a plan in other cases. On occasion, these PRNS decisions to ignore guidance documents, and/or to point to other policies it claims to be adhering to can be harmful to the ranchers and undermine public trust in the planning process. Ranchers request that this EIS analyze how the agency, NPS and PRNS, will inform ranchers and the public about any changes to ranch management that result from this process. It should detail a roll-out process with target dates to accomplish any changes. Furthermore, this EIS should analyze and share with the public a process for ranchers and/or the public to initiate if they have reason to believe that the plan that comes out of this process is not being followed by PRNS. A commitment to delegate day-to-day oversight and management decisions to a nonprofit partner, or guidance from an Ag Advisory Committee made up of local agricultural and resource experts outside of NPS would reassure ranchers that the park service will follow through on the plan approved as a result of this process--a necessity if agriculture in the Historic Ranch Districts is to survive and thrive into the future.

Dear Ms. Parks: I read with interest the recent article (probably from the Point Reyes Light) regarding the conflict between Pt Reyes ranchers and the tule elk. I have a long history with the issue of the elk. In the mid-1990s I sat on an advisory committee for the NPS, to study the tule elk situation and recommend a management approach. The outcome of that advisory group was recommendation to test the idea of fertility control, and approach that was already showing promise with other species. That in turn, led to a trial of fertility control, headed up by the

late Susan Shideler, of UC-Davis. A three year study showed significant reduction in elk calves as a result of treatment with a non-hormonal contraceptive vaccine Known as PZP). The vaccine was delivered remotely, by dart gun. The results are shown below: While the number of elk treated (cows only) was below that to achieve zero population growth, it had a stabilizing effect on the entire herd and actually slowed growth to historic lows. The results of this trial were published in a highly respectable scientific journal (Shideler et al. 2002. Use of porcine zona pellucida (PZP) vaccine as a contraceptive agent in free-ranging tule elk (*Cervus elaphus nannodes*). *Reproduction (Suppl. 60)*: 169- 176. After the completion of the project, PORE reluctantly continued using the approach for about two more years but there were political reasons why PORE finally chose to retreat from this approach. The real tragedy was that they had everything in place to continue on, increase application and make a significant change in the elk population. One common reason why PORE retreated was that they claimed it was too expensive, but used research costs instead of simple management costs; there is a big difference between running a research program and a management program. That, however, was merely an excuse and some rather arcane politics stood at the center of the decision. Application of fertility control, using this same vaccine has gone worldwide. Wild horses are being successfully managed in this manner on many ranges, where BLM bureaucracy has not prevented it; urban white-tailed deer are being successfully managed in this manner; the entire Catalina Island bison herd is being managed in this manner and has achieved zero population growth in a single year; even African elephants, in 15 different game parks in South Africa are being managed in this manner. Now, application of PZP to PORE elk would not immediately stop the intrusion onto agricultural lands. However, every new calf born to one of those cows will learn the luxury of grazing on agricultural lands and the problem will grow. Fertility control can help and depending on the effort, it can make a difference. I have over the years, watched the issue carefully, largely through the articles in the Pt Reyes Light, and I am dismayed that such a scientifically valid approach was jettisoned by the park and everyone sat around for over 15 years watching the problem get larger and larger with little more than hand-wringing. If they had employed this approach 15 years ago, the herd size would be a fraction of what it is today. While I realize that your organization is seeking immediate relief, I cannot help but wonder what the situation will look like 15 years from now. You remarked that because those elk are a public resource, the nation has a stake in the outcomes. Well, I'm from Montana, and I have spoken and I know what of I speak. If you want to know more about this, feel free to contact me.

Attached Point Reyes National Seashore 2001 Year in Review

Elk Fence Facts Important background to the planning process:

- The pastoral zone was created by Congress to protect the ranching and farming heritage. No elk were located within PRNS when the seashore was created.
- The 1998 elk management environmental assessment included an alternative that would have allowed elk to inhabit the pastoral zone. The public rejected this alternative and the alternative to move elk into the designated elk range within the Limantour wilderness was selected.
- Elk invasion into the pastoral zone is a recent problem and should not be considered a "baseline environmental condition" of this 150+ year ranching region. The current Ranch Comprehensive Management Plan EA should properly use a no-elk baseline and consider the adverse effects of elk within the pastoral zone. Including the elk within the pastoral zone as a baseline condition would cause the process to ignore the new adverse effects on the ranches caused by the elk - the effects the public in 1998 meant to avoid by rejecting the alternative to allow elk onto the pastoral zone.
- Elk within the pastoral zone are harming ranchers' livelihoods and threatening the future of ranching within the pastoral zone.

Facts about the proposed fence in the Limantour area:

- The proposed fence would keep the elk herd free-ranging within the 18,000 acre elk range designated and approved during the 1998 elk environmental assessment and would be consistent with the current, operative elk management plan that resulted from the 1998 NEPA EA process that approved placement into that specific elk range.
- In 2001, PRNS stated that the new elk herd located within the Limantour elk range is "monitored to ensure animals [elk] remain within Seashore boundaries, do not interfere with cattle ranches within the park and are not shedding the organism that causes Johne's disease." The proposed fence will help facilitate the above PRNS stated responsibilities.
- The proposed fence line location has been reviewed by experienced fence builders to insure feasibility and to create a budget.
- The fence line could be located to avoid most difficult areas.
- The 4-mile long fence could be constructed quickly.
- Fencing at Tomales Point has already proven to be an effective tool to keep elk off the pastoral zone within PRNS.
- The proposed fence is unlikely to affect visitor experience because the fence will be essentially out of sight to most Seashore visitors. It could be seen from the top of Mt. Vision Overlook and by some hikers in the vicinity.
- The proposed

fence is unlikely to affect visitor experience for Seashore visitors interested in viewing Tule elk. The herd on Tomales Point and the herd in the designated elk range at Limantour will remain for viewing by seashore visitors.

- The proposed fence would have an estimated one-time construction cost of between \$250,000 and \$300,000.
- The fence would eliminate the need for PRNS to continuously spend money hazing elk that are causing damage within the pastoral zone.
- The fence would eliminate the need for PRNS to continuously spend money repairing fences damaged by elk within the pastoral zone.
- The fence would eliminate the need for PRNS to continuously spend money to develop water, pasture and other elk habitat within the pastoral zone.
- The fence would alleviate the responsibility for PRNS to continuously compensate ranchers for the pasture consumed by the invading elk.
- The proposed fence would likely protect the pastoral zone from elk invasion. At one end, the fence would terminate at the top of a steep, vegetated section of the Inverness ridge. No tule elk have been reported to have passed the Inverness Ridge. At the other end, the fence would terminate in Limantour Estero. In a similar situation at PRNS on Tomales Point, elk have died of starvation yet have never been known to cross Tomales Bay. Similarly, elk have never been seen swimming in Drakes or Limantour Esteros nor has PRNS provided any elk GPS collar data demonstrating that elk have crossed any water barrier.
- The fence would allow PRNS to focus on a one-time relocation program to move the elk back to where they were intended.
- The fence would allow PRNS to manage elk herds within wilderness areas without the need to consider, manage, mitigate or pay for ongoing damage to other permitted uses within the seashore.
- The fence would most likely save taxpayer money in the long run.
- The fence would allow the permitted, historic use of ranching to continue without competition from elk.

#1344

Name: Gruenke, Gini

Correspondence: Regarding the Pt. Reyes National Seashore Gen. Management Plan Amendment- Draft, Environmental Impact Statement I would like to share the following: I favor the "minimum of 20 years" criterion for ranch leases, not "up to 20 years". Stability is established. I believe the elk population should be limited. Rep. Huffman has suggested that the herd reduction he accomplished strength making the elk available to the local indigenous groups of people for consumption. I also believe that tourism need the controlled, including the litter and damage resulting. Thank you for your consideration.

#1345

Name: Carr, Christopher

Correspondence: Dear Superintendent Muldoon: This letter presents comments on behalf of our clients Phyllis Faber and the Resilient Agriculture Group (collectively, RAG), in response to the Notice of Intent to Prepare an Environmental Impact Statement (EIS) for a General Management Plan Amendment (GMPA), Point Reyes National Seashore and North District of Golden Gate National Recreation Area, Marin County (collectively, PRNS or Seashore). 83 Fed. Reg. 54775 (Oct. 31, 2018). The EIS and GMPA concern all lands currently under agricultural lease/permits within the PRNS. RAG is a local public benefit organization committed to ensuring the continuation of responsible and sustainable agriculture, including beef and dairy ranching, at the PRNS. The NOI notes that the 2017 multi-party litigation settlement agreement, pursuant to which the NPS is preparing the GMP A and EIS, expressly authorizes the NPS to "give full consideration to other potential action alternatives." 83 Fed. Reg. 54775. RAG strongly believes the EIS must include and analyze an alternative consistent with the "Community Alternative" proposed by Kevin Lunny and the Ranchers within the Point Reyes National Seashore (PRNS Ranchers). RAG therefore joins, and includes by reference herein, the comment letter submitted by the PRNS Ranchers, and also the comment letters submitted by Dr. Laura A. Watt and Phyllis Faber. Comment 1: EIS Must Analyze the Community Alternative. The Community Alternative, including the proposed elements described in comments 3-6 below, must be analyzed in the EIS. The National Environmental Policy Act (NEPA) requires an EIS to analyze all "reasonable alternatives which would avoid or minimize adverse impacts or enhance the quality of the human environment." 40 C.F.R. §§ 1502.1, 1502.14. The universe of reasonable alternatives is "limited by reference to the objectives of the federal action" or, in other words, "the purpose and need to which the agency is responding." Committee of JOO on Federal City v. Foxx, 87 F.Supp.3d 191, 216 (D.D.C. 2015), citing 40 C.F.R. § 1502.13. "A reasonable alternative must meet this purpose and need, and also be 'technically and economically practical or feasible.'" Ibid., citing 43 C.F.R. § 46.420(b). • The Community Alternative easily satisfies

this standard, requiring it to be analyzed in EIS. ___ The Community Alternative is consistent with the purpose and need of the National Park System, and the PRNS particularly, where ranches and dairies have existed for more than 150 years. The purpose of the National Park System is to "conserve 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." 54 U.S.C. § 100101(a) (emphasis added). The Community Alternative is also consistent with the agency's stated purpose of the GMP A and EIS: to "establish guidance for the preservation of natural and cultural resources and the management of infrastructure and visitor use within the planning area." 83 Fed. Reg. 54775.1 The agency itself recognizes: that the GMP A and EIS must address, inter alia, "the future Management of tule elk and leased ranch lands." id.

The community alternative is not only consistent with, but would best implement and give effect to Congress's intentions in establishing the PRNS in 1962. Through the PRNS's Enabling Act; Congress established a national seashore 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 U.S.C. § 459c. The Enabling Act directed the NPS to use its discretion to lease PRNS lands "which were in regular use for, or were being converted to agricultural, ranching, or dairying purposes" prior to the lands' acquisition. 16 U.S.C. § 459c-5. While Congress's Intent in passing the Enabling Act for PRNS is well-known, preservation and wilderness extremist groups have long sought to undermine and indeed eliminate ranching and dairying there. Representative Huffman's pending legislation (H.R. 6687, passed unanimously by the U.S. House of Representatives in September 2018 and currently awaiting action in the U.S. Senate), which seeks to ensure the perpetuation of working ranches and dairies at PRNS,2 would put an end to such efforts, including the endless cycle of litigation those groups have pursued. H.R. 6687 would "direct the Secretary of the Interior to manage the [PRNS] consistently with Congress' long-standing intent to continue to authorize working dairies and ranches on agricultural property as part of the seashore's unique historic, cultural, scenic and natural values, and for other purposes." The Community Alternative is consistent with H.R. 6687, and will preserve the PRNS's historic, cultural, and natural resources for future generations, and ensure the continuity of its historic ranches and dairies.

In contrast, the six alternatives identified to date by NPS3 will significantly impair ranching and dairying at PRNS. The analysis of just those alternatives would fail to satisfy NEPA's mandate that an EIS analyze all "reasonable alternatives." 40 C.F.R. §§ 1502.1, 1502.14. The EIS must analyze the Community Alternative because it is "technically and economically feasible" and "would avoid or minimize adverse impacts or enhance the quality of the human environment." 14 C.F.R. § 1502.1; 43 C.F.R. § 46.420(b).

Comment 2 - National Historic Preservation Act: "With the passage of the National Historic Preservation Act (NHP A) in 1966, the federal government embarked on a new era of leadership in the preservation of our nation's historic properties."4 Similarly, by adding the Olema Valley Dairy Ranches Historic District (14,127 acres) and the Point Reyes Peninsula Dairy Ranches Historic District (22,237 acres) to the NHPA's National Register of Historic Places (National Register) in April 2018 and October 2018, respectively, the NPS has embarked on a new era of leadership in the preservation and continuation of the historic ranching and dairying uses, activities and infrastructure at PRNS. Under the NHPA, the NPS administers the National Register. At PRNS, the NPS has pursued the listing of these two districts on the National Register for more than 25 years.5 This effort is consistent with the PRNS and GGNRA enabling acts, and with H.R. 6687. Having pursued and at last obtained these National Register listings, and as administrator of the National Register, it is incumbent upon the NPS to ensure through the GMP A and EIS that historic ranching and dairying and other agricultural activities, and their associated landscapes and infrastructure, not just continue but flourish at PRNS. The NPS is obligated in the EIS to evaluate all alternatives against this mandate. Under Section I 06 of the NHPA, all federal agencies such as the NPS are legally required to consider the impact of their proposed actions on historic properties. As part of that obligation, federal agencies are required to consult with the Advisory Council on Historic Preservation (ACHP), the State Historic Preservation Officer (SHPO) (here, the California Office of Historic Preservation), federally recognized Indian tribes, local governments, and other approved organizations and individuals with a demonstrated interest. Such consultation can be done separate and apart from the EIS process, or as part of and in conjunction with the EIS process. 6 With respect to the NHP A, the GMP A is unique in that the federal undertaking does not just have an effect on an historic property. Rather, by virtue of the National Register listing,

one purpose of the GMPA is necessarily now the management of two very large federally designated historic districts. As such, the consultation requirements of Section 106 are especially critical. NPS is required to develop a plan for involving the public. 36 C.F.R. § 800.3(e). NPS is also required, in consultation with the SHPO, to identify "any other parties entitled to be consulting parties and invite them to participate as such in the section 106 process." *Id.* at (f). RAG specifically requests that the NPS notify the public within sixty (60) days of the precise means and process by which the NPS intends to fulfill its Section 106 consultation obligations, to ensure that all consulting entities and the public have an opportunity to participate fully in the Section 106 process'. RAG also specifically requests that the NPS formally invite the ACHP to participate in the Section 106 consultation, due to the unique circumstances of this undertaking.

See 36 C.F.R. §. 800.6(a)(1)(i)(A) .

All federal agencies are also required to comply with applicable historic preservation Executive Orders, including Executive Order 11593 - Protection and Enhancement of the Cultural Environment ("The Federal Government shall provide leadership in preserving, restoring and maintaining the historic and cultural environment of the Nation. Agencies ... shall administer the cultural properties under their control in a spirit of stewardship and trusteeship for future generations" and shall ensure that historic properties "are preserved, restored, and maintained for the inspiration and benefit of the people") and Executive Order 13287 - Preserve America ("It is the policy of the Federal Government to provide leadership in preserving America's heritage by actively advancing the protection, enhancement, and contemporary use of the historic properties owned by the Federal Government"). The EIS and GMPA must evaluate the application of these and other applicable historic preservation Executive Orders to the Proposed Action and proposed alternatives. The NPS must also implement and comply with its own historic and cultural resource protection and preservation policies. 7 The EIS and GMPA must evaluate the application of these and other applicable Department of the Interior and National Park Service policies to the Proposed Action and proposed alternatives. The NPS states that under its Proposed Action, it "would implement a strategy prioritizing maintenance of historic buildings on ranches in collaboration with park ranchers." The EIS must specify, in detail, exactly what that strategy is (in other words, the NPS can't defer the development of the strategy to some later time), and then analyze the implementation of that strategy in the EIS. That strategy must reflect the results of the "preliminary condition assessment" which the NPS has "recently conducted ... on many of the historic structures in the ranch complexes." 8 That assessment concluded that "most ranch infrastructure was in fair to poor condition and in need of repair." See fn. 8. Hence, the strategy must include specific plans (including federal funding sources, and timing) by the NPS to preserve, rehabilitate and restore such infrastructure. As the owner of these facilities, the NPS must assume the responsibility for preserving, rehabilitating and restoring these facilities in a timely manner. It is not sufficient under the NHPA for the NPS to instead merely seek to "manage" such structures "in collaboration with park ranchers" (See fn. 8), which sounds like a euphemism for trying to force park ranchers to do such work. The EIS and GMPA must also specifically analyze the relationship between cattle grazing and the pastoral grassland landscapes within the two historic districts. The pastoral grasslands are a fundamental attribute of the historic districts; that attribute must be preserved by virtue of the historic district designation; and continued cattle grazing is necessary to preserve those grasslands. Without cattle grazing, those pastoral grasslands will quickly be overtaken by coyote brush, poison oak and other scrub plant species, rendering them both unsuitable for grazing and historically unrecognizable in terms of their more than 150 years of use for ranching and dairying. See Scoping Comments for the Point Reyes National Seashore GMP Amendment, Burt Heneman, December 31, 2017 (Attachment A) (among other things, this comment letter previously submitted to the NPS contains a photograph depicting the quick and deleterious effect on the pastoral grassland landscape of the elimination of grazing). 9 Comment 3: 20-Year Leases/Permits. The EIS should include an alternative that studies the impacts of issuing existing ranch families 20-year agricultural leases/permits that renew automatically at the end of each 20-year term. Unless the terms of a lease/permit are being violated, NPS should have no discretion regarding renewal.

20-year leases are consistent with the PRNS's Enabling Act (16 U.S.C. §§ 459c-459c-7), and the Proposed Action Alternative, which requires NPS to "[i]ssue agricultural lease/permits with 20-year terms to existing ranch families." 83 Fed. Reg. 54775. 10 20-year leases are also consistent with H.R. 6687. The benefits of long-term, automatically renewing leases, are many and include increased rancher and dairymen investment in

infrastructure, repairs, rangeland improvements, and conservation projects. Long-term leases incentivize ranchers and dairymen to make investments to diversify their agricultural options and construct improvements to make their operations more economically and environmentally sustainable. Increased rancher and dairymen investment is due, in part, to the increased certainty of return on investment and the far greater availability of bank loans and conservation grants which result from longer-term leases. 11 Long-term leases also help preserve agriculture at the PRNS, which has cultural, ecological, historic, and economic value. Culturally, agriculture connects consumers with the origins of their food, locally produced by historic family farms that have been recognized for their environmental stewardship and innovation. 12 Ecologically, livestock grazing is an important tool for conserving and restoring native species and plays a vital role in promoting the health of coastal grasslands. 13 Economically, the agricultural operations on PNRS lands represent a substantial portion of Marin County's economy, contributing 17 percent of its overall agricultural production and 17 percent of its agricultural land base. 14 The benefits of long-term, self-renewing 20-year leases must be analyzed because they help ensure the viability of the PRNS's working ranches and dairies and preserve the Seashore's historic and cultural resources. Comment 4: Management of Tule Elk. The EIS must include an alternative that evaluates effective management of the tule elk, as required to fulfill the intent of the Enabling Act, and as expressly directed by Rep. Huffman's bill. H.R. 6687 provides that "[i]n areas of agricultural property where Tule Elk present conflicts with working ranches or dairies, the Secretary shall manage the Tule Elk for separation from the working ranches or dairies." 16 U.S.C. § 459c- 6(c)(1), as proposed. Effective separation of tule elk from ranches in the planning area and the Pastoral Zone is a sine qua non of fulfilling Congress's intent in passing the Enabling Act. H.R. 6687 would help ensure that NPS consistently and effectively gives effect to that intent. However, at this time, none of the alternatives identified by NPS, and especially its Proposed Action alternative, promote effective management of tule elk.

The EIS must evaluate several methods to achieve effective separation of tule elk from the ranches and dairies in the Pastoral Zone. Methods include maintaining and improving tule elk habitat within the elk ranges designated by, the operative Tule Elk Management Plan (TEMP) (i.e Tomales Point and Limantour elk ranges and the Wilderness areas). See TEMP, p. 48. 15 The Tule Elk Management Plan was implemented in 1998 to maintain viable populations of tule elk. One of the Elk Plan's purposes was to "[m]anage tule elk consistent with other management objectives, including agriculture, public visitation, and the protection of natural, cultural, and recreational resources." TEMP, p. 38 (emphasis added). The Elk Plan directs NPS to achieve that purpose by controlling elk populations "through management techniques of contraception and relocation," and, in some cases, lethal removal. See TEMP, pp. 42-47, 49-50. NPS's Proposed Action Alternative agrees that "translocation" and "agency-managed lethal removal methods" are at least viable elk management techniques. 83 Fed. Reg. 54775. These techniques should also be evaluated as a means to achieve effective separation. The NPS should also study the benefits of building a fence on the boundary between the planning area and the wilderness area that contains, in its entirety, the designated tule elk range. Fencing is effective and feasible and would be beneficial to both the ranchers and the elk. See TEMP, pp. 43-44. It would allow the elk to range freely in the areas where they were intended by the Elk Management Plan, such as the Limantour and Tomales Point elk ranges. Simultaneously, the elk would be restricted from entering and causing damage to ranches and dairies in the planning area.

In Contrast, the Proposed Action Alternative is ineffective and would result in severe adverse consequences for ranchers/dairymen and the elk. NPS's proposed alternative would manage the elk through hazing and enhancing their habitat in the Pastoral Zone. Experience at the PRNS has shown that elk that have been hazed away from ranch pastures promptly return, resulting in an extremely stressful cycle wherein a wildlife species is subjected to continuous human disturbance. Enhancing the elk's habitat creates an elk attractant, likely to result in harm to both ranchers/dairymen and elk. For example, harm to ranchers and dairymen would likely include: (i) damage to property, including fences or other structures; (ii) damage from elk consumption of pastoral grass, which puts ranchers and dairymen at risk of not having enough forage for their cattle; and (iii) injury, disease, or death to cattle, including from John's disease or aggressive male elk. 16 Similarly, elk could be harmed by disease from cattle, stress, or lethal removal by NPS staff. The Proposed Action Alternative is also inadequate because it fails to analyze the impacts to ranchers and dairymen from the Home Ranch herd and merely proposes to "evaluate management of the Limantour free-range herd if they affect ranchlands." 83 Fed. Reg. 54775. NPS's alternative ignores the fact that there are significant, known, and documented adverse impacts to ranch and dairy lands in the area around Drakes Estero Trail from the Limantour elk herd leaving its designated range. Both herds constitute a

significant financial burden to ranchers and dairymen from increased costs associated with feeding and watering cattle and repairing fences.¹⁷ NPS has a responsibility to protect the ranchers and dairymen from the dangers and damages associated with tule elk. Any alternative must analyze effective measures to manage the Limantour and Home Range herds. In sum, effective separation of the tule elk from the ranches and dairies at the PRNS must be analyzed in the EIS. It is a technically and economically feasible means of managing elk and will achieve preservation of the Seashore's historic ranches and dairies and other cultural and historic resources. 43 C.F.R. § 46.420(b). Comment 5: Diversification and Operational Flexibility for Ranches. The EIS must evaluate opportunities for ranch and dairy operational flexibility and diversification, consistent with current and historic precedents at the Seashore. The PRNS Ranchers' proposal is consistent with the Proposed Action Alternative which includes "opportunities for operational flexibility and diversification . . .and provide[s] programmatic review of best management practices." 83 Fed. Reg. 54775. Marin County, in its Countywide Plan Policy AG-2, also states its support for agricultural diversification and operational flexibility. ¹⁸ Diversification and operational flexibility are necessary for ranchers and dairymen to compensate for changes in markets, climate, weather conditions, feed prices, and consumer interest. This allows ranchers and dairymen to remain competitive in the local agricultural marketplace and provides the community with a diversity of local foods. ¹⁹ Ultimately, to remain truly competitive, the GMP A must allow the Seashore ranchers and dairymen the same operational flexibility as other local family farmers. The following diversification and operational flexibility opportunities should be analyzed in the EIS because they will help ensure the continued viability of ranches and dairies in the Seashore. Diversification. Crops, livestock, and ranch and dairy operations that have environmental impacts similar to, or the same as, those in the century before the Seashore was established should be candidates for future use. For example, there is precedent at the PRNS for the diversification of livestock, including ruminants, sheep, and poultry for food and fiber. There is also precedent for the commercial production of row crops, orchards, and grain crops for human and livestock consumption. The NPS is familiar with the history of diversification at PRNS. Its website dedicated to the "Ranching History at Point Reyes" provides: "During the Depression, ranchers and dairymen struggled to make ends meet. It was not uncommon for ranchers and dairymen to augment their incomes with expanded livestock production, such as beef cattle, chickens, and eggs. Several ranches and dairymen invited Japanese immigrants to raise peas, and Italian immigrants to cultivate artichokes on more remote parcels. These ventures were usually successful."²⁰ The methods of diversification be analyzed in the EIS. Historically, on-site processing and sale of food and fiber products from Seashore ranchers and dairymen, including Johnson's and Drakes Bay Oysters, has also been allowed at the PRNS. Finally, ranchers and dairymen should be permitted to allow lodging and public education on Seashore ranches and dairies, including farm tours and stays. These diversification methods must also be analyzed in the EIS. Contrary to NPS 's proposed land management framework, ranchers and dairies should also be given flexibility, based on their knowledge of the region's soil and other characteristics, and historic uses, to raise different products and quantities in different zones (i.e. ranch core, pasture, and range). Ranchers and dairymen should also be allowed to restore agricultural uses to some lands that had been taken out of production. Diversification, consistent with the above suggestions, is necessary to ensure the economic viability of Seashore ranches and dairies and must be analyzed comprehensively in the EIS. Operational Flexibility. The EIS should, at the very least, evaluate the following operational flexibilities: (i) the harvest and storage of on-farm planted and volunteer forage for feeding livestock during times of the year when forage is scarce on rangelands; (ii) range management practices known to be effective for improving foraging quality and quantity; (iii) best management practices, including management intensive grazing and standards set by the Marin Carbon Project; (iv) farm product (i.e. crop and livestock) diversification; (v) grazing strategies; (vi) removal of maximum stocking rates and stocking densities; (vii) lodging and public education; (viii) on-farm processing and retail sales of products grown in the Seashore; and (ix) new worker housing and upgrades to existing worker housing, where necessary. These operational flexibilities are historically and culturally appropriate and will provide the necessary options for ranching and dairying families at the Seashore to remain economically viable. See fn. 18. To be successful, all ranches and dairies must be given the same opportunities for operational flexibility, including permit conditions, duration, and authorizations. Comment 6: Agricultural Advisory Committee. The EIS should also evaluate the formation of a PRNS Agricultural Advisory Committee. The Committee would be made up of local agricultural and natural resource conservation experts, including a member from each: (i) The United States Department of Agriculture (USDA), National Resource Conservation Service, and its local office, the Marin County Resource Conservation District; (ii) the Marin County Agricultural Commissioner's Office; (iii) the University of California Cooperative Extension; and (iv) the Marin Agricultural Land Trust. The creation of an Agricultural Advisory Committee is consistent with the

Enabling Act and H.R. 6687, and any alternative that will continue ranching and dairying at PRNS. The NPS at PRNS lacks expertise and experience in ranching and ranch operations. In contrast, the proposed Committee is made up of organizations with historic knowledge and the expertise necessary to advise NPS on important agricultural planning and management decisions. These organizations include: -USDA Natural Resource Conservation Service. The National Resource Conservation Service's Environmental Quality Incentives Program provides financial and technical assistance to agricultural producers to address natural resource concerns and deliver environmental benefits such as improved water and air quality, ground and surface water conservation, reduced soil erosion and sedimentation, and improved wildlife habitat. -Marin County Resource Conservation District. Offers programs to facilitate ranchers' implementation of resource conservation projects, including watershed preservation and restoration projects. For the past 13-years, the Conservation District's "Marin Permit Coordination Program" has "help[ed] ranchers plan, permit, fund, and implement practices that will minimize impacts to wildlife and water quality." - Marin County Agricultural Commissioner's Office. Helps ranchers and dairymen at PRNS protect agriculture and the environment through pest prevention and integrated pest management, proper pesticide handling and storage practices, and livestock management. -UC Cooperative Extension. Has, for decades, been providing ranchers and dairymen at the PRNS University of California research-based information on agricultural management, including livestock industry and range, and natural resource management. Marin Agricultural Land Trust. Established in the 1980s to purchase agricultural conservation easements with the object of enhancing Marin County's natural and agricultural values. The Trust's staff help ranchers and dairymen at the PRNS plan and secure funding for projects to manage weeds and improve soil, rangeland, and water quality. The creation of an Agricultural Advisory Committee should be studied in the EIS as a "measure[] for the preservation of the [Seashore's] resources." 54 U.S.C. § 100502(1). The Committee would help avoid or minimize adverse impacts to the environment from ranching and dairying and enhance the quality of the human environment. 40 C.F.R. § 1502.1. Conclusion In conclusion, RAG supports the analysis of the Community Alternative in the EIS similar to the one proposed by the PRNS Ranchers. The Community Alternative will manage the Seashore's historic, cultural, and natural resources in a manner that preserves them for future generations and also ensures the continuity of the Seashore's historic ranches and dairies. RAG appreciates the opportunity to provide comments on the GMPA and EIS. If you require additional information, please do not hesitate to contact me.

Scoping Comments for the Point Reyes National Seashore GMP Amendment Burr Heneman, December 31, 2017". These comments argue that any General Management Plan Amendment alternative that significantly reduces dairy and beef ranching in the Seashore will result in impairment of the seashore's scenic, natural, and historic resources and values. Grasslands are important for the Seashore's scenic resources and values, natural resources and values, and historic/ cultural resources and values.

-grasslands are important for the Seashore's scenic resources and values, natural resources and values, and historic/cultural resources and values. -Those pasture and rangeland management practices, especially grazing, are the only practicable means of maintaining the grasslands. -In most areas of the Seashore, ending cattle grazing will result in loss of the grasslands. -Therefore any GMP Amendment alternative that ends or significantly reduces ranching in the Seashore will result in significant loss of grasslands and impairment of the Seashore's scenic, natural, and historic/cultural resources and values. B. Grasslands and the Seashore's Scenic Resources and Values**

The scenic resources of the Seashore are a mosaic that includes esteros, lagoons, ridges and hills, forests, expanses of coastal scrub, and a few thousand acres of almost pure grassland. Those grasslands, emerald green for much of the year, are not natural. They would not exist Without the grazing and mowing that ranchers have, practiced for 160.years-tlr more. The extent grasslands prior to the ranches isn't known for certain, but Native Americans apparently used fire routinely to control brush at Point Reyes. We do know that in 1857, before the first dairies, Point Reyes was described as "cow heaven" with "an abundance of rich grass and clover" (MLM p.2). Conrad Wirth, the first NPS advocate for National Seashore at Point Reyes, testifying to the Point's rich biological and scenic values in 196, emphasized the "extraordinary diversity of the forest, beaches, grasslands, dune vegetation, and marshes (MLM, p.46).

The managed grasslands, a key element in the Seashore's scenic resources and values, were here before the ranches, here when the Seashore was created, and are still here today, a much appreciated feature of the Seashore's landscape. Losing the grasslands or a significant portion of them would be an impairment of the Seashore's scenic resources and values.

Maintaining the grasslands requires some combination of grazing, mowing, and fire. Fire, the only tool available to Native Americans, is presumably no longer an option. Broad-scale mowing is impractical and would be a nonsensical waste of resources. That leaves grazing, supplemented by modest amounts of mowing- the type of management that the ranches have been practicing through their history on the Point. (continuing the types of grassland and range management that are currently being used also allows- and the GMP Amendment should require- continuous improvement in stewardship and adoption of best practices that minimize impacts on natural resources.)

Removing cattle from grassland areas will result in the loss of grasslands. The photo below, with H Ranch on the left and a portion of K Ranch on the right, shows an advanced succession from grassland to coastal scrub and invasive weed species after only about 40 years without pasture management. A similar example is the land between Abbotts Lagoon Trail and the upper lagoon, which was still being tilled for silage in the early 1980s and is now coastal scrub. Another example: the former pastures at the south end of the Olema valley east of Highway 1 that were taken over by Scotch broom when grazing ended. Much of the grassland in the Seashore would undergo similar changes if grazing by cattle and other forms of pasture management are discontinued or significantly reduced. Tule elk can not be a functional replacement for cattle in maintaining the grasslands. One need only look at places inside and outside the Seashore where tule elk occur to understand that removing cattle from some or all of the grasslands and allowing elk to replace them will result in the loss of grasslands. Elk grazing is not intensive enough to maintain the grasslands.

C. Grasslands and the Seashore's Natural Resources and Values Conversion of grasslands to coastal scrub would also result in negative impacts on natural resources. For instance, grassland plant species of concern will be lost without active management. Nesting habitat for grassland nesting bird species of concern such as Grasshopper Sparrows and the Bryant's subspecies of the Savannah Sparrow would be reduced. Among mammals, badgers, whose population has recovered so well since the Seashore was established, would lose habitat.

Conversion of grasslands would also result in diminished recreational opportunities. For example, birders avidly search grasslands for interesting species, especially in fall and winter.

D. Grasslands, the Historic Ranches, and Ranching Activity* The historic working ranches on the point have had one of the basic "use" or "activity" ranching. (see the Appendix for how the NPS and DOI use these and other terms in this section.) The historic resource is the ranches including the ranching. Without the ongoing activity of ranching, the historic resource would be no more than qualifying structures and the visible patterns of land use and transportation related to the ranches. But as the NPS interpretation of the National Historic Preservation Act states, historic and cultural resources need not be limited to physical entities. The Seashore's historic resources and values obviously include "the park's scenery, natural, and historic objects, and wildlife, and the processes and conditions that sustain them" [MP 2006 1.4.6]. Note the use of the present tense- "sustain" - instead of sustained. Clearly, ongoing "processes and conditions" can be part of the historic resource. The ranches of the Seashore are an "historic vernacular landscape," one of the four types of 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" [DOI p 4; MP 2006, Glossary p. 157]. The associated activity -ranching- continues today, so the working historic ranches are an example of how "A cultural resource may be tangible entity or a cultural practice" [MP 2006, Glossary p. 157]. In the case of the historic ranches, the cultural resource is both "tangible entities" and an ongoing "cultural practice." In short, the historic working ranches include both an historic and current use that is a cultural practice. The cultural practices -ranching- is a key part of the cultural resource and value that is to be conserved unimpaired.

NPS has explicit policy for conserving this type of cultural resource. The treatment of a cultural landscape will preserve significant physical attributes, biotic systems, and uses when those uses contribute to historical significance. Treatment decisions will be based on a cultural landscape's historical significance over time, existing conditions and use.

That's one of the policies that supports continuing the historic and existing "use" of ranching. The policy also speak to the preservation of physical attributes of a cultural landscape, including the historic patterns of land use, such as the layout of the ranches and many fence lines. But it .also includes the rich variety of pasture and range that have characterized the Seashore for as long as there has been ranching on Point Reyes large grazed areas where vegetation- varies from mixed scrub and grassland to the several thousands of acres. of .almost pure .grassland. Remove or greatly reduce the normal range mmanagement practices and a significant piece of the visible historic resources will be lost as costal scrub and weed species replace grasslands.

E. The necessity of pasture and range management The seashore's grasslands are a key element in three of the seashores most important resources. They are important for grassland plant and animal species and they are part of the still visible pattern of land-use on the historic ranches. In spite of the NPS and DOI policies cited, as well as the realities on the ground, the NPS might decide that the ongoing ranching activity itself is not part of the Seashore's historic resouces and values. Nonetheless grazing by cattle as well as the limited use of mowing are the only practicable means for maintaining the grasslands that are key elements of the scenic, natural, and historic resources. The historic and current pasture and range management practices used on the ranches preserve the varied scenery, habitat for grassland-dependent species, and the still visible land-use patterns of the ranches.

F. The counter argument To counter the argument made in these comments would require NPS to determine that:
- The vegetation patterns resulting from cattle grazing, especially the grasslands, are not important to the scenic resources and values of the Seashore and that losing all or a significant portion of the would not impair the Seashore's scenic resources; and -the vegetation patterns resulting from cattle grazing, especially the grasslands, are not important to the natural resources and values of the Seashore and that losing them would not important the Seashore's natural resources; and -the vegetation patterns resulting from cattle grazing, especially the grasslands are not important to the historic resources and values of the Seashore and that losing them would not impair the Seashore's historic resources; Or, -removing cattle grazing and other forms of pasture and range management from all or a significant portion of the Seashore would not result in the conversion of all or most of those areas to coastal scrub and weed species; and - There are practicable means other than cattle grazing and other forms of pasture management to maintain the grasslands.

Appendix -- Policy Background (NPS and DOI reference documents are listed on page 4) 1. The fundamental purpose of a national park is to conserve park resources and values. 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. [MP 2006: 1.4.3] 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. [MP 2006: 1;4.4]

2. Park resources and values include scenic, historic, and cultural resources and values - including cultural landscapes - and the "conditions. that sustain them." The "park resources and values" that are subject to the no-impairment standard include: the park's scenery, natural and historic objects, and wildlife, end 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; archaeological resources, cultural landscapes; ethnographic resources; historic: and prehistoric sites, structures, and objects; museum collections, and native plants and animals [MP 2006: 1.4.6] 3. Cultural Landscape - A cultural landscape is a geographic area that is associated with an historic activity. Cultural landscape- a geographic area, including both cultural and natural resources and the wildlife or domestic animals therein, associated with an 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. [DOI p.4, MP 2006, Glossary p 157]

Of the four types of cultural landscapes, it's clear that the historic ranches in the Seashore represent an historic vernacular landscape. Moreover, in a vernacular landscape, "use" and "function" are significant:

Historic vernacular landscape- a landscape that evolved through use by the people whose activities or occupancy shaped it. Through social or cultural attitudes of an individual, a family, or a community, the landscape reflects the physical, biological, and cultural character of everyday lives. Function plays a significant role in vernacular landscapes. This can be a farm complex or a district of historic farmsteads along a river valley. Examples include rural historic districts and agricultural landscapes [DOI p.5]

4. a cultural resource may be a "cultural practice" - what is the cultural practice? Clearly, a cultural practice is closely related to the "use" or "function" of the landscape: 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 resources may be tangible entity or a cultural practice. [MP 2006, Glossary p. 157]

#1346

Name: Tank and Haner, Bonnie and Doug

Correspondence: Dear Superintendent Muldoon, We have been residents of Point Reyes Station for over 14 years. Prior to that, we lived in San Francisco and were regular visitors to the Point Reyes National Seashore since 1970. We moved here because of the natural beauty and community we found in small town life. As residents, we have a large stake in the decisions that are being made regarding the National Seashore and we appreciate this opportunity to add our input to the General Management Amendment. Ranches We believe that ranching and dairy farming have historically been an integral part of the fabric of the community. The importance of this was recognized when the park was initially established and now it has become increasingly vital to the local economy and the visitor experience. To continue to be successful business people and effective stewards of the land the ranchers need to have renewable 20 year leases. This will give the them the incentive and tools to plan and be successful in their business. Elk We enthusiastically supported the reintroduction of the elk to their historic habitat Now there is the problem of how to sensibly manage the elk population so that both the health of the herd and the vitality of the ranches are maintained. As the elk herd has increased and expanded it's territory, effective management practices become critically necessary. The ranchers should not be responsible for their feed and water. Visitor Capacity The communities surrounding the PANS have always been welcoming to visitors. However, as the number of visitors increase each year, so does auto and bike traffic, questionable parking practices, and increased trash. We have become concerned for the protection of our natural resources and our quality of life. We need to have a clean and safe park for those who visit and for those who live in the surrounding communities. To help manage the increased visitor load, increased staffing, infrastructure maintenance and protection need to be an integral part of the Management Plan. As active local residents, members of PRNSA and other local community groups, we have volunteered with the park service to help maintain trails, plant native plants and even worked in the museum. We support our Park and our local ranches and believe they both bring important benefits to our community. It is our hope that the EIS process will inform the Park Service as to the possible measures necessary to improve the environmental sustainability of the ranches and dairies, inform elk management, and improve visitor access while protecting natural and cultural resources. Thank you for accepting our comments. We appreciate this opportunity.

#1347

Name: Mendoza, Jarrod

Correspondence: I Jarrod Mendoza of the Historic B Ranch appreciate the opportunity to comment on the Point Reyes National Seashore (PRNS) and the North District of Golden Gate National Recreation Area (GGNRA), (collectively the "Seashore") General Management Plan (GMP) Amendment Process and submit this response to the Notice of Intent To Prepare an Environmental Impact Statement for a General Management Plan Amendment published in the Federal Register on October 31, 2018. The Notice of Intent requests scoping comments on the purpose and need and alternatives and this letter is my response to the request for comments. Last year I commented on the Park Service's request for comment. My comments on the current notice of Intent build on my prior comments, and incorporate issues addressed in the legislative and report language for H.R. 6687. 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 in the agricultural property. I am honored and grateful to be part of this longstanding history and I 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. I also value the working ranches which provide an opportunity for the public to learn about where and how their food is produced. I offer the following big-picture comments for consideration during this comment period and I will participate fully in subsequent stages and opportunities to discuss the future of the GMP for the Point Reyes National Seashore and Golden Gate National Recreation Area.

I. Purpose and Need Purpose The Purpose and Need is a framework establishing the long-term management of the 28,000-acres also known as agricultural property under the Point Reyes Act. This comprehensive direction should include the overall goals for sustainable dairy and beef ranching in the Seashore with lease terms of 20 years and provide for separation of elk and working ranches and organic dairies. Ranching has a long and important history on the Point Reyes peninsula and adjacent National Park Service (NPS) lands. In fact, the Department of Interior recently designated the Point Reyes Peninsula Dairy Ranches Historic District and the Olema Valley Dairy Ranches Historic District on the National Register of Historic Places. These working ranches are a vibrant part of the culture of the Point Reyes National Seashore and represent an lands. Protection of these diverse and unique resources is an important responsibility shared by the NPS and Seashore ranchers within the agricultural property. I request that the purpose and need explicitly acknowledge these concerns and suggest the following edits to the proposed purpose and need in the Notice of Intent.

Purpose The purpose of the EIS for the General Management Plan Amendment is to establish guidance for the preservation of natural and cultural resources and manage agricultural property consistent with Congress' long-standing intent that working dairies and ranches continue to be authorized to operate on agricultural property as part of the Seashore's unique historic, cultural, scenic and natural values including the management of infrastructure and visitor use within the planning area. The alternatives evaluated in the EIS will also address the future management of Tule elk and leased ranch lands and the effective separation of elk from working ranches and dairies. Need Action is needed at this time to address the park's highest priority planning issues which include the management of approximately 28,000 acres of land currently leased for ranching. There is a need to address concerns related to Tule elk impacts on the environment and working dairies and ranches. There is a further need to provide clear guidance and streamline processes for Seashore and regulatory review of proposed ranching activities including best management practices that promote protection of Seashore resources. Action is also needed to comply with the terms of the Settlement Agreement which requires that the GMP Amendment and EIS be completed on or before July 14, 2021.

II. Alternatives While the Settlement Agreement identified three alternatives that were to be evaluated in the Environmental Impact Statement (EIS), it is also clear that the National Park Service must consider a full range of alternatives, that include additional options for Point Reyes. The NPS GMP Notice of Intent includes the three Settlement Agreement alternatives. However, I urge consideration of several modifications or additional alternatives. I envision a somewhat expanded alternative building off the "Continued Ranching Alternative" proposed by NPS whereby NPS would allow for limited additional opportunities in farming and diversified agricultural production which is historically and culturally consistent on these agricultural properties, to complement existing ranching and dairy activities. I believe that such limited additional uses would provide multiple economic and educational benefits to the community and would strengthen the overall local food supply and local economy of the region. I am not proposing in this alternative expanding beyond the current 28,000-acre agricultural property. In addition, under this alternative, NPS should consider a somewhat longer lease term (25-30 years) for ranches and dairies to facilitate investments in our agricultural infrastructure that will make me more productive, efficient, and

protective of the environment. The added term can help me amortize such measures in a sustainable, long term fashion. An additional modification to this Continued Ranching Alternative would be consideration of forage improvement practices which could result in modest additions to existing herds and dairy farms consistent with water quality improvements and carbon sequestration practices. I also ask NPS to include an alternative or modify existing alternatives that would remove the free-range elk herds (Drakes Beach and Limantour) from the agricultural properties. This would provide the best solution for addressing ongoing conflicts that occur to historic ranching, and cultural resources. The 1998 Elk Management Plan provides for this and the nearly 20 years of mixed and frustrating results in implementing alternative practices to reduce conflicts in forage use and infrastructure upkeep demonstrate why this alternative has merit. The scoping notice description of alternatives is misleading in that it presumes today's extent of the elk herds is currently approved in the existing GMP. That said, I fully support continuation of Tule Elk in other areas within the Seashore. There are about 86,000 acres in the Seashore and GGNRA administered by the Seashore Park Service staff. Of the total acres, 33,000 acres are Wilderness and only 28,000 acres are agricultural property. Many of the acres on the agricultural property are certified organic which requires that livestock graze on natural grass. If Tule Elk deplete the available forage, it threatens the organic certification of the ranches, and their beef and dairy products. Ranches without sufficient pasture will never be able to gain certification. Therefore, I believe an alternative is required that includes effective separation of the Tule Elk from the agricultural property while allowing the elk on the 53,000 acres of nonagriculture property. I suggest that the "Reduced Ranching" alternative contains no justifiable rationale for its proposed elimination of specific ranches containing no residences and should be amended to reduce ranching only where there is an arguably justifiable reason. No such reason is apparent in this initial description of the alternative nor is it consistent with Congressional intent. All ranching alternatives should include provisions for housing on the Seashore that maintains and supports the historic dairies and ranches. In particular, the alternatives should include provisions for making underutilized or replacement housing available for the farm workforce and retaining their existing housing. III. Issues A Economic Analysis Reducing or eliminating ranching and dairies from Point Reyes would have profound adverse economic consequences for the local and regional economy. These family ranches are essential to many local and regional businesses and represent an important cultural and economic way of life that extends beyond the Seashore. The ranches are a critical part of that cultural mosaic of estuaries, lagoons, ridges, hillsides, forests, and beautiful grasslands that make up the overall environment which in turn attract thousands of visitors every year. Without the stewardship of the ranching community, much of this landscape would not be there today. The GMP and EIS must assess these positive and important economic benefits not only to the ranching and dairy families but to the broader region as a whole. Local employment, changes to demographics, and local community wellbeing must be considered. Even our local school system is heavily dependent upon the enrollment of students from ranching families and their employees' families. The B ranch currently has twelve children that go to schools within the shoreline unified school district. I would like the NPS to address the issue in their amendment if those children were taken out of the district what the effect on the district it would have. Many of the spouses of employees and the spouse of the Lessee on the B ranch work at local businesses. B. Environmental Stewardship and Best management Practices I support implementation of best management practices (BMP) for ranching, dairying, and other agriculture activities. The GMP and accompanying EIS should evaluate these BMPs to ensure their applicability, practicality, and success in protecting the environment and ensuring economic viability all of which is consistent with federal, state, and local requirements. As I have done frequently in the past, I am prepared to step forward to assist with important environmental projects ranging from preserving threatened species to improving water quality. I continue to be willing participants in considering, where feasible and necessary, other environmental measures that may add to the success of BMPs in protecting the natural values of the Seashore. EIS should include accomplished conservation projects and practices achieved with other agency partners. EIS should also include future opportunities to accomplish the same resource conservation through water quality, air quality, and soil management programs and partnerships. These partner agencies include Natural Resource Conservation Service, Marin Resource Conservation Service, Bay Area Air Quality Management District, UC Cooperative Extension and USDA Farm Service Agency. With respect to methane and climate change, I believe the GMP/EIS should address how local ranches and dairies may play an important role in mitigating such impacts, potentially through carbon offsets and other payments for environmental services. Marin County and the State of California are leaders in this area and I welcome the opportunity to work with them as part of this effort. I also believe that a variety of public and private partners may provide important technical and financial resources to assist in this effort. NPS and the ranching community at the Seashore can develop state-of-the-art approaches and serve as a model for

programs elsewhere. I would also like to note the addition of the new Conservation Framework. As written, I have significant concerns about how this could affect our historic agricultural practices. We request that the EIS team include important rancher input to develop this framework. C. Elk While I support manageable populations of Tule Elk at Tomales Point and the Limantour Wilderness, I strongly urge NPS to adopt a GMP Amendment that provides all the necessary tools to prevent elk from occupying the agricultural properties within the Seashore and insure that overpopulation of Tule elk will not occur. This is consistent with the direction in H.R. 6687 that "in areas of agricultural property where Tule Elk present conflicts with working ranches or dairies, the Secretary shall manage the Tule Elk for separation from the working ranches or dairies." Conflicts caused by the elk with existing ranches and dairies are well documented. NPS has correctly expressed its concern about the difficulty and expense of managing Tule elk outside the Tomales Point and Limantour Wilderness areas and explained that "The 1998 Tule Elk Management Plan/EA did not contemplate the expansion of Tule elk into the pastoral lands." I agree with the Park Service statement in the Notice of Intent that "The NPS would manage within that range using translocation outside of the park if practicable, or agency managed lethal removal methods." 83 Fed. Reg. at 54776 (October 31, 2018). Consistent with H.R. 6687, the GMP Amendment should provide for removal of Tule elk outside of Tomales Point and Limantour areas by using all effective means including, among other things, full cooperation with the California Department of Fish and Wildlife and "Indian Tribes interested in (1) relocation and reestablishment of Tule Elk on Tribal lands, (2) participating in hunting Tule Elk on a subsistence or ceremonial basis, and (3) other partnerships and activities that the Secretary determines are suitable and feasible for this purpose." D. Diversification The GMP/EIS process should evaluate a variety of additional agricultural and related activities that could help to strengthen the area's economy, build on its tourism base, and bring high quality educational programs to the area. These complementary uses add to the sustainability of the ranches and ranching families while enhancing visitor experiences. Diversification can include selected planted or naturally occurring crops, additional livestock production, farm stands and retail sales, processing and value-added production, farm stays, farm educational tours, expanded work with the school systems and 4-H organizations. Think of the community benefits that would come from a comprehensive NPS educational/tourism program celebrating the cultural history of the area and ranching and agriculture's contribution to that history. Consideration of on-farm grown and stored livestock feed of silage and hay should be included in this examination. This long-standing farming practice combines the benefits of critical seasonal forage production with effective weed management, balanced herd nutrition and distribution management. It also reduces the need for imported supplemental feed and incentivizes effective on-site resource use and ranch resiliency. I agree with the statement in the Notice of Intent that "the proposed action would include opportunities for operational flexibility and diversification." 83 Fed. Reg. at 54776 (October 31, 2018). E. Operational Flexibility Regular infrastructure maintenance and repair at the Seashore has often been delayed for extended periods of time in part because guidelines are unclear or nonexistent. The GMP should contain more specific guidelines so critical work can be efficiently authorized by NPS in the future. In the coming months while the GMP progresses, I would welcome a working group to develop appropriate guidelines to assist the agency in more efficient and timely decision-making and allow effective management of weeds, fire fuels, water quality protection, livestock watering and distribution, and other field and ranch level concerns. I agree with the statement in the Notice of Intent that "the proposed action would include opportunities for operational flexibility and diversification." 83 Fed. Reg. at 54776 (October 31, 2018). F. Succession I encourage the GMP and EIS to review the all-important issue of succession to current and future leases. One overall goal of NPS should be to ensure that current families continue their stewardship of existing ranch and dairy lands and provide a continuity of ownership going forward. But in the event that families choose not to continue ranching and dairying, how best can NPS continue agricultural operations on the affected land? The key operative is to continue this rich heritage and the environmental stewardship that accompanies it. Thinking through the issue of succession with the families of current lessees, and then, if necessary (if a family can no longer continue ranching), looking to other parties interested in continuing ranching and agriculture at the Seashore should be a component of the GMP. Within this framework, I know the past experience and judgment of existing ranching families will provide important guidance to NPS. G. Leases To ensure consistency and facilitate clear understanding of forthcoming requirements and operational issues, it would be helpful for the GMP and EIS to contain a draft lease template. I urge NPS to meet with PRSRA and individual ranchers to discuss past leasehold provisions and where new approaches can be adopted to reflect important on-the-ground considerations. Consistent with Interior Secretary Salazar's commitment to 20-year leases and consistent with H.R. 6687, the GMP and EIS should issue leases and special use permits of 20 years for working dairies and ranches on agricultural property unless there is no willing lessee, or unless a rancher desires a

lease shorter than 20 years. As part of this analysis, prior to expiration of the proposed 20-year term, steps should be provided for renewing and issuing new leases. On the B ranch the hay barn has collapsed. Other structures have also fallen down due to weather or because they have lost their structural integrity and had to be taken down to prevent harm to animals or humans. The loafing barn which is used to winter animals is in need of major repairs. The Park Service conducts yearly housing inspections for ranch worker housing and at times requests major housing repairs. My own home is need of major repairs for example the roof is in need of repair. The room where my daughter sleeps has a section of roof that leaks terribly. Without a long term lease it impossible to get the needed financing to make the long term repairs that are needed. The cheap patchwork that is the only option in the long run ends up costing more having to constantly make the same repairs. The short term leases have not been a good scenario for making large infrastructure investments. Considering the three settlement agreement alternatives has also created an even larger lack of confidence in making said repairs. I appreciate the opportunity to provide these initial comments and I look forward to working with NPS on all subsequent stages of the GMP and EIS. Sincerely, Jarrod Mendoza **Attached Image: The purpose of the attached image is to address the new Conservation Framework by the NPS. All of the pastures in the boundary marked with red are a vital part of the everyday operation of B ranch. Only being able to make day to day operational decisions on 30% of the marked boundaries would be very difficult for the historic practices. For example being able to only spread manure on 30% of the encompassed area would not be a best management practice. The entire ranch boundary needs to be open to this sort of practice. Spreading manure on the same areas year after year can lead to invasive plant species such as thistle.

#1348

Name: McIntosh, Beverly

Correspondence: General Management Plan Amendment As long time active supporter of agriculture in Marin County including the ranchers in the Sea shore,, I whole heartedly support Congressman Huffman's legislation and alt. b. In addition, I want to remind the decision makers that PRNS is part of the UNESCO Golden Gate MAB/Man and Biosphere Reserve. There are 84 of these reserves in the United !States, including PRNS. The purpose of these special areas is to work to reduce conflicts between the legitimate historical land uses and biological constraints. Scientists from a MAB in Brittany were here,,actively assisting with research in the soon to be GGNRA. This was in the mid 90's. The Brittany MAB has many similar problems including recreational uses vs agriculture/fisheries established uses. Relative to the introduced elk, the peninsula which is a major part of the Seashore)has very limited carrying capacity for both domestic and wild animals. In recognition of this scientific fact, the 1999 Interim Mgt. Plan limits the maximum combined number of to 250 - 350 elk. Herd expansion on to neighboring ranches was not anticipated 1999. There are 25 locations available to accept excess elk for relocation. Let's observe the conventions of the UNESCO MABs and support our ranches which have contributed to the health and well being of the Bay area's food shed for its 9 million residents to say nothing of the 17 million annual 'Visitors to the Seashore.

#1349

Name: Brown, Kris

Correspondence: Regarding Lease Length: We need to offer a minimum of 20 years leased to support the viability of ranching, which allows for investments in infrastructure and resources management. The Park plan must provide minimum security for ranchers. I noticed Alt B now says "up to 20 years". That does not honor Ken Salazar's promise in HR6687.

Rancher Participation: I support and encourage strong and transparent working relationships with ranchers.

Visitors: I urge the Park to conduct a complete visitor carrying capacity analysis.

Thank you,

#1350

Name: Heneman, Burr

Correspondence: Dear Superintendent Muldoon: Thank you for the opportunity to comment during the scoping phase of the EIS for a General Management Plan Amendment (GMP A) for the Point Reyes National Seashore 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 48 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. General comments 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 referenced in alternatives B, C, D, and E, and enhanced by possible diversification activities. Continued ranching is consistent with all of these: • The history of the area; • 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 by primarily by families who have persisted here for multiple generations; • National Park Service practice in the management of the planning area; • The directive, six years ago today, from then Secretary of the Interior Ken Salazar to offer up to 20-year leases to ranchers in the planning area; • Maintaining the Seashore's natural, historic, and scenic resources and values without "impairment or unacceptable impacts" (as discussed in NPS Management Policies 2006, 1.4.3.1-1.4.7.1). Specific Comments A.1. Alternatives D, E, and F: Reduced ranching, no dairy ranching, and no ranching The EIS should include a thorough analysis of why any General Management Plan Amendment alternative that significantly reduces dairy and beef ranching in the a significant portion of them would be an impairment of the Seashore's scenic resources and values. Maintaining the grasslands requires some combination of grazing, mowing, and fire. Fire, the only tool available to Native Americans, is presumably no longer an option, at least not on the scale of the grasslands in the Seashore. Broad-scale mowing is impractical and would be a nonsensical waste of resources. That leaves grazing, supplemented by modest amounts of mowing - the type of management that the ranches have been practicing throughout their history on the Point. (Continuing the types of grassland and range management that are currently being used also allows - and the GMP Amendment should require - - continuous improvement in stewardship and adoption of best management practices that enhance, or at least minimize negative impacts on natural resources.) Removing cattle from grassland areas will result in the loss of the grasslands. The photo below, with H Ranch on the left and a portion of K Ranch on the right, shows an advanced succession from grassland to coastal scrub and invasive weed species after only about 40 years without pasture management. A similar example is the land between the Abbotts Lagoon Trail and the upper lagoon, which was still being tilled for silage in the early 1980s and is now coastal scrub. Another example: the former pastures at the south end of the Olema Valley east of Highway 1 that were taken over by Scotch broom when grazing ended. Much of the grassland in the Seashore would undergo similar changes if grazing by cattle and other forms of pasture management are discontinued or significantly reduced. Tule elk can not be a functional replacement for cattle in maintaining the grasslands. One need only look at places inside and outside the Seashore where tule elk occur to understand that removing cattle from some or all of the grasslands and allowing elk to replace them will result in the loss of grasslands. Elk grazing has not been intensive enough to maintain grasslands at Pierce Point, for example, where coastal scrub and invasive weeds, such as radish and poison hemlock, have gradually been replacing more open rangeland. A.3. Grasslands and the Seashore's Natural Resources and Values Conversion of grasslands to coastal scrub and extensive stands of invasive weed species would also result in negative impacts on natural resources. Grassland plant species of concern will be lost without active management. Nesting habitat for grassland nesting bird species of concern such as Grasshopper Sparrows and the Bryant's subspecies of the Savannah Sparrow would be reduced. Among mammals, badgers, whose population has recovered so well since the Seashore was established, would lose habitat. Most of the larger mammals make limited use of dense coastal scrub. Conversion of grasslands would also result in diminished recreational opportunities. In the Fall, birders avidly search grasslands and silage fields for interesting species. And hikers seem to prefer landscapes that are more open than dense, tall coastal scrub. A.4. Grasslands, the Historic Ranches, and the Ranching Activity*· The historic working ranches on the Point have had one basic "use" or "activity": ranching. (See the Appendix for how the NPS and DOI use these and other terms in this section.) The historic resource is the ranches including the ranching. Without the ongoing activity of ranching, the historic resource would be no more than qualifying structures and the visible patterns of land use (including the grasslands) and transportation related to the ranches. But as the NPS interpretation of the National Historic Preservation Act states, historic and cultural resources need not be limited to physical entities. The Seashore's historic resources

and values obviously include "the park's scenery, natural and historic objects, and wildlife, and the processes and conditions that sustain them" [MP 2006: 1.4.6]. Note the use of the present tense - "sustain" - instead of sustained. Ongoing, ongoing "processes and conditions" can be part of the historic resource and are in the case of ranching in the planning area. The ranches of the Seashore are an "historic vernacular landscape," one of the four types of 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" [DOI p. 4; MP 2006, Glossary p. 157]. The associated activity- ranching - continues today, so the entity or a cultural practice" [MP 2006, Glossary p. 157] In the case of the historic ranches, the cultural resource is both "tangible entities" and an ongoing "cultural practice". In short, the historic working ranches include both the historic and the current use that is a cultural practice. The cultural practice - ranching - is a key part of the cultural resource and value that is to be conserved unimpaired. NPS has explicit policy that supports continuing the historic and existing "use" of ranching for conserving the historic ranch districts in the planning area: The treatment of a cultural landscape will preserve significant physical attributes, biotic systems, and uses when those uses contribute to historical significance. Treatment decisions will be based on a cultural landscape's historical significance over time, existing conditions, and use. [MP 2006, 5.3.5.2) The policy also speaks to the preservation of physical attributes of a cultural landscape, including historic structure and the historic patterns of land use, such as the layout of the ranches and many of the fence lines. But it also includes the rich variety of pasture and range that have characterized the Seashore for as long as there has been ranching on Point Reyes: large grazed areas where vegetation varies from mixed scrub and grassland to the several thousands of acres of almost pure grassland. Remove or greatly reduce the normal range management practices and a significant piece of the visible historic resource will be lost as coastal scrub and weed species replace grasslands.

A.5. The Necessity of Pasture and Range Management

The Seashore's grasslands are a key element in three of the Seashore's most important resources. They are important to the scenic resources and the aesthetic appreciation of the Seashore. They are critically important for many grassland plant and animal species. And they are part of the still-visible pattern of land-use on the historic ranches. In spite of the NPS and DOI policies cited, as well as the realities on the ground, the NPS might decide that the ongoing ranching activity itself is not part of the Seashore's historic resources and values. Nonetheless grazing by cattle as well as the limited use of mowing are the only practicable means for maintaining the grasslands that are key elements of the scenic, natural, and historic resources. The historic and current pasture and range management practices used on the ranches preserve the varied scenery, habitat for grassland-dependent species, and the still-visible land-use patterns of the ranches. In considering alternatives D, E, and F, the EIS analysis should either support or negate one of the following sets of premises. Either:

- The vegetation patterns resulting from cattle grazing, especially the grasslands, are not necessary to the scenic resources and values of the Seashore and that losing all or a significant portion of them would not impair the Seashore's scenic resources; and
- The vegetation patterns resulting from cattle grazing, especially the grasslands, are not important to the natural resources and values of the Seashore and that losing them would not impair the Seashore's natural resources; and
- The vegetation patterns resulting from cattle grazing, especially the grasslands, are not important to the historic resources and values of the Seashore and that losing them would not impair the Seashore's historic resources; • Removing cattle grazing and other forms of pasture and range management from all or a significant portion of the Seashore would not result in the conversion of an unacceptable amount of those areas to coastal scrub and weed species; and
- There are practicable means other than cattle grazing and other forms of pasture management to maintain the grasslands. In regard to the last bullet, simply stating that it would be possible to maintain the grasslands with mowing or fire or tule elk grazing would not pass the test of being practicable. It would need to be clear how most of the grasslands can, in the real world, be maintained with some combination of those or other management tools. In the analysis of alternatives B, and C, the EIS should analyze the value of maintaining current, or near current, acreage for grazing for resource management that might otherwise be beyond the capacity of NPS and how that would preserve the scenic, natural, and historic resources and values of the planning area.

B. Pasture and Range Management and Natural Resource Protection

The EIS and GMP A should include a transparent process, with rancher participation and using the best available information to build more detail into the Conservation Framework and the Land Management Units, as well as ranch-specific plans. As an aid to that process, and for more detailed topics that arise, the EIS should consider the Seashore's forming, or encouraging the formation of by others of an agricultural advisory group made up of local agricultural and natural resource conservation experts. The group would draw on resources such as the 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 and ranchers on agricultural planning and management and stewardship decisions. This group should go beyond the limited consultation that has been possible at the Seashore in helping the Seashore and ranchers identify concerns and explore ways to address them. The EIS, in evaluating proposed Land Management Unit classifications, should include an analysis of how grasslands will be maintained without conversion to coastal scrub and large stands of invasive weed species. (The discussion of this topic in section A is relevant here.) The EIS and GMP A, in evaluating the conservation framework, should be as broad or detailed as it needs to be to encourage new best management practices that ranchers can apply. Carbon sequestration techniques may become practicable someday should be possible without starting from zero in the Seashore's project review process. The same should be true for adopting new manure-management methods on the dairies, such as transitioning from manure ponds to dry systems that the state of California is encouraging. C. Lease length The EIS preferred alternative should include processes that prepare for lease renewal well before the expiration of the term of the current lease. Longer leases promote longer-term thinking by ranchers and, therefore, longer-term viability of ranching operations. It is in the interest of the NPS to take the limited steps that it can to foster economically successful ranches. Economically stressed farmers are rarely good stewards. Economically healthy farmers are much more likely to also be good stewards. Along this line, one important thing that NPS can do is design a system in which lease terms do not run down to expiration before ranchers receive some assurance that their operations can continue. There needs to be a mechanism that allows ranchers to be able to count on renewals if they are meeting both standard requirements and ranch-specific requirements in their lease-permits. Those requirements may include investments in infrastructure upkeep, natural resource management, maintenance of healthy water and air quality, and assurances of farm employees' welfare. At the same time, the NPS needs to be able to withhold renewals, or use other means to achieve compliance with lease-permit requirements if they are not being met. D. Diversification The alternatives that allow ranching propose Land Management Units of core, pasture, and range, with diversification limited to ranch core areas. For diversification in ranch core areas, the EIS should evaluate adaptive re-use of historic buildings for diversification activities in some circumstances. Also, the EIS should evaluate a more resource-relevant way to locate diversification activities than to restrict them only to ranch cores. A type of diversification that might make sense in the core area of one ranch might be lower impact and more successful outside the core. Locating the activity should be dependent on a checklist of relevant ranch specific factors such as natural resource impact, visual impact, availability of water, wind, availability of existing adaptable infrastructure, etc. Again, thank you for the opportunity to comment. I send best wishes to you and your staff for a smooth process leading to the Draft EIS.

Appendix -- Policy Background (NPS and DOI reference documents are listed in the footnote on page 2) 1. The fundamental purpose of a national park is to conserve park resources and values. 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. [MP 2006: 1.4.3] 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. [MP 2006: 1.4.4] 2. Park resources and values include scenic, historic, and cultural resources and values - including cultural landscapes - and the "conditions that sustain them." 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: 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 ... [MP 2006: 1.4.6] 3. Cultural Landscape - A cultural landscape is a geographic area that is associated with an historic activity. Cultural landscape- a geographic area, including both cultural and natural resources and the wildlife or domestic animals therein, associated with an historic event, activity, or person, or exhibiting other cultural or esthetic values. There are four nonmutually exclusive types of cultural landscapes: historic sites, historic designed landscapes, historic vernacular landscapes, and ethnographic landscapes. [DOI p. 4; MP 2006, Glossary p. 157] Of the four types of cultural landscapes, it's clear that the historic ranches in the Seashore represent an historic vernacular landscape. Moreover, in a vernacular landscape, "use" and "function" are significant: Historic vernacular landscape - a landscape that evolved through use by the people whose activities or occupancy shaped it. Through social or cultural attitudes of an individual, a family, or a

community, the landscape reflects the physical, biological, and cultural character of everyday lives. Function plays a significant role in vernacular landscapes. This can be a farm complex or a district of historic farmsteads along a river valley. Examples include rural historic districts and agricultural landscapes. [DOI p. 5] 4. A cultural resource may be a "cultural practice" - What is a cultural practice? Clearly, a cultural practice is closely related to the "use" or "function" of the landscape: 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. [MP 2006, Glossary p. 157]

#1351

Name: Hoffman, Walter

Correspondence: I believe in wilderness for Point Reyes National Park as intended for all living things! Animal, plants, and everything in between. There for I'd like to see alternative F implemented - No Ranching and expansion of Tule elk in the planning area.

Keep up the good work and congratulations in booting the Drakes Bay oyster company from Drakes Bay (estero).

#1352

Name: McDonald, Mervin

Correspondence: 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 care about these ranches. We understand that if these lands are not taken care of the future of ranching will die. Alternative D: Reduced Ranching and Management of the Drakes Beach Tule Elk Herd We think there is no basis for the reduced ranching alternative. Apparently, the ranches that will be eliminated in the alternative do not have any residences. However, the N Ranch does not have a residence but is an instrumental part of our ranch operation combined with the Home Ranch. Eliminating ranches from continued ranching just because there is no residence makes no sense. The N Ranch is one of the most productive ranches in PRNS. It is one of the only ranches that do not require supplement hay to be brought in and fed to the cattle. Taking this ranch out of production would cause vegetation to become overgrown leading to unhealthy, unproductive conditions which will promote the spread of invasive species and a decline in desirable species. N Ranch borders the PRNS wilderness where there are acres and acres of dead trees. Under grazing bordering properties adjacent to the wilderness would lead to the buildup of plentiful fuel for a huge wildfire. Removing N Ranch from production would also have adverse economic impacts on Marin County, which benefits from agriculture and ranching businesses that directly provide jobs and indirectly supports other jobs through the purchase of equipment and supplies. It does not support the economy to put another ranching family out of business. Elk Why are the management strategies of Drakes elk herd and Limantour elk herd different in the alternatives? If the Limantour elk herd is not put back in the designated elk range, they will, and are, multiplying as the Drakes Beach herd is doing. The scoping notice and map refers to this as the Limantour-Estero Road Herd. We strongly believe this should be the Limantour herd separated from the ranchlands. The map downplays the impact of the elk and states: "The female/juvenile groups rarely cross onto ranchlands and generally inhabit wilderness areas northeast and southwest of Limantour Road. Male bachelor groups inhabit ranchlands nearest to Estero Road and across Sir Francis Drake Boulevard, either individually or in small groups. Most males return to the wilderness areas to join the female groups during the rut from summer into fall." This statement makes it seem like the elk are fully compatible with continued ranching. However, the impacts on fencing, and loss of forage are significant. We strongly disagree that elk are in the wilderness from summer into fall. There should be an alternative that separates the elk from ranchlands. We support managed elk on Tomales Point and Limantour Wilderness. We also support both elk herds separation from ranches in cooperation with California Dept. of Fish and Wildlife & Indian Tribes. We suggest returning the elk to their designated range in the wilderness and fence the boundary between the Home & N Ranches and the wilderness area that contains the designated Tule elk range. Invasive and non-native plant The majority of Home Ranch is covered with Romulea Rosea (onion weed). This is an invasive, non-native plant believed to be exacerbated by the drought. It over takes a pasture therefore the native grasses are less plentiful. Livestock do not graze on Romulea. In fact, if swallowed Romulea is indigestible and could cause

acute intestinal obstruction in cattle. We support and will collaborate with NPS to eradication of this invasive, non-native plant. The Plan amendment should address the invasive and non-native plants and include proactive steps to control these plants and restore native plants. Home Ranch Core 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. The residential permittee understood ranching and allowed us to use the core. A ranch cannot be operated without corrals and the small pastures in and around the core. The corrals are used to do vet checks, buy, sell and monitor our cattle. The small pastures temporarily house an occasional cow that needs more attention. We urge PRNS to include the core of the ranch back into the Ag permit to make Home Ranch whole again. Also, 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 corrals. 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 then ranch workers, who understand cattle, would not be feasible. Alternatives We also believe the preferred alternative should be modified to include removal of elk along Estero Road and north of Sir Francis Drake Boulevard. The Park Service assumes that only a few male elk will be in these areas and that they will return to the wilderness for the summer and fall. If the elk will not be separated from the ranchlands, then we want at least a provision in the preferred alternative that will require action to prevent further expansion of the elk along Estero Road and to the North, particularly if females begin to permanently occupy the area outside the wilderness. It is vital that the EIS include an alternative that separates the elk from the agricultural property. Such an alternative would be consistent with Congressman Huffman's legislation and is essential to continued ranching on the Seashore so that the elk do not eventually take over all of the agricultural land. We also believe the preferred alternative should be modified to include removal of elk along Ester Road and north of Sir Francis Drake Boulevard. The Park Service assumes that only a few male elk will be in these areas and that they will return to the wilderness for the summer and fall. We fully support the Community Alternative: Continued Ranching and Manage Elk for Effective Separation From Ranches. Based on the purpose and need for action, the Community proposed action includes the following elements: • Issue agricultural lease permits with 20-year terms to existing ranch families to continue beef and dairy and associated agricultural operations on approximately 27,000 acres within the planning area. • 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. • Explore opportunities for ranch operational flexibility and diversification, establish up to approximately 900 acres of collaboratively managed resource protection buffers, and provide a programmatic review and approval process for operational flexibility, diversification and best management practices. • Tule elk would be managed for effective separation from ranches. No elk herds would be allowed to establish in the planning area • The NPS would implement a strategy prioritizing maintenance of historic buildings on ranches in collaboration with seashore ranchers. Prioritization would take into account historic preservation goals and the needs of ranch operations. In some cases, adaptive reuse of historic buildings would be considered to support diversification activities. • NPS would implement strategies to remove non-native, invasive plants and to manage special status plants in collaboration with seashore ranchers. • Strategies for the management of historic ranch complexes within the planning area but not part of currently active ranch operations would be identified including: prioritization of specific buildings, structures, and landscapes for preservation based on their importance to the overall integrity of the historic district and opportunities for adaptive reuse. As appropriate, the seashore would evaluate potential for decommissioning/deconstruction of low priority or substantially degraded structures/complexes as part of this plan. The community proposed action represents one alternative that should be considered during the EIS process. To save space and avoid repetition, we incorporate by reference and support the points in the scoping letter submitted by the Point Reyes Seashore Ranchers Association and the longer and much more detailed scoping letter submitted by PRNS and GGNRA Family Ranchers. Thank you for the opportunity to provide these comments.

#1353

Name: Salzman and Peterson, Barbara and Phil

Correspondence: Dear Superintendent: Thank you for considering Marin Audubon Society's scoping comments on the Draft Environmental Impact Statement for the Amendments to the General Management Plan. MAS is not opposed to continuing agriculture at Pt. Reyes, recognizing that ranching was part of the agreements and enabling legislation that provided for the establishment of the Seashore. MAS's primary concern is for the protection of the park's wildlife and habitats. Such protections are, in our view, have been given very limited or no attention in all of the publications on the General Management Plan Amendment and the EIS. In addition, we submitted scoping comments last year on issues that we wanted addressed, but there is no evidence they were considered much less addressed in the updated MANAGEMENT PLAN AMENDMENT NOTICE. We request that they be addressed in the EIS. We submit the following comments and questions to be addressed in the EIS: 1. Include the text of the enabling legislation, specifically the sections that address continuation of ranching at the Seashore. 2. Alternatives Discussions • An Alternative should be included that allows for gradual return of some of the ranches to natural habitat should there be no one in the family line that wants to continue in ranching. It appears that under some alternatives, the NPS or the current ranchers would go outside the family to find others to ranch the lands. An alternative that allows for ranch lands to be phased out and restored to natural habitat, if no family members are interested in ranching. Discuss a mechanism by which such a phase-out could occur. Perhaps there could be prioritization of some ranches for such a retirement based on natural resource values. Could the Park Service reconfigure the ranch boundaries to better protect natural resources? This could include the creation and protection of wildlife movement corridors connectivity for habitat types. • Measures Common to all Alternatives section in public document - Why are there no proposed measures addressing natural resource protection? All of the stated measures have to do with expansion of public use. For all proposed uses and expansion of existing uses, the potential impacts of these uses on the park's wildlife and habitats must be thoroughly discussed. • What enforcement is available to the NPS if the requirements are violated? What procedures are used and what measures are taken if requirements are violated? • Management of the Elk Herd is a part of all alternatives. It is probably a given that at some point in time, earlier if all ranching remains as it is today due to limited habitat, or later in the event some or all ranchers were removed, that the elk would eventually expand beyond the park. Discuss whether it is anticipated there would have to be control of elk with no ranches and when it could be anticipated that would occur. When would elk outgrow the park boundaries? 4. Specific Alternatives Alternative B - Continued Ranching and Elk Management As requested above, discuss, as part of this alternative or a separate alternative, current succession of ranch lands as allowed by the NPS and an option of retiring lands and restoring them to natural habitat particularly if there is no family succession interested in ranching or if there is poor or irresponsible land management. Could the boundaries of the ranches be reduced in order to protect more sensitive habitat/wildlife? The discussion of diversification should address the potential impacts of each diversification on natural resources of the park. What alternatives are being considered or are possible in place of or in addition to dairy or beef, particularly if dairy or beef production is no longer of interest to individual ranchers or becomes uneconomical? Discuss the impacts of each alternative. With weather conditions in West Marin, what crops would be feasible to grow? What impact could or would row crops have on the natural habitats and wildlife? What if small animal production (chickens, turkeys, sheep, pigs) are proposed? These would likely attract predators. What restrictions would be put in place to control hunting and trapping of raptors, coyotes, mountain lions, bobcats, and other predators done in the interest of protecting livestock? Resource protection buffers are called for in several of the alternatives. Discuss the purpose, design, and management of the proposed resource protection buffers and describe their proposed condition (vegetated, unvegetated, fenced, and location) in the landscape. Describe what is meant by the Drake's Bay Herd would be "managed at a level compatible with authorized ranching operation." How were the proposed population thresholds of 100 and 160 animals arrived at? What other locations are known where the elk could be transported? Prioritizing should be on the basis of protection of wildlife and habitats as envisioned in the creation of the PRNS. The preservation of historic buildings should be secondary. Alternative C - Continued Ranching Removal of Elk Herd. This alternative would violate the proposed Conservation Framework and the responsibility of the NPS to protect natural resources. Alternative D - Reduced Management and Management of Elk As part of this alternative, as mentioned above, we request that options be evaluated that would allow for reducing ranch lands gradually over time if current ranch families have no family members interested in ranching or if ranchers have demonstrated a lack of responsibility stewarding the ranch lands. Alternative E - No Dairy and Limited Management of Elk Discuss the impacts of dairy ranching and beef cattle ranching on the habitats for wildlife and other natural resources. What are the specific

resource protection and "park goals" that would be used to limit elk population under this alternative? The language is too vague to allow for informed public comment. Where is it expected additional herds could form? Alternative F - No Ranching and Expansion of the Elk Herd Discuss phasing could be over a longer time and dependent of intergenerational. What are the conditions for the life estate ranches? Do they expire at the death of specific individuals? Please address the improvement, enhancement and protection of habitat for wildlife that could be expected under this alternative. The discussion only addresses peoplecentered facilities and trail, not the park's natural resources. Who operates the five ranches where no residential use is? Are they leased by other Ranchers in the park boundaries? What were the circumstances that led to their not having the ranchers in residence? 5. The A CONSERVATION FRAMEWORK section of the General Management Plan document discusses a zoning framework of core, pasture and range apply to action alternatives. "PROTECTION OF NATURAL RESOURCES" is listed as the first category to be protected. The listed resource information used to identify range LMUs is insufficient, too limited and inadequate. A primary reason is that only threatened and endangered species are listed. The Point Reyes Peninsula, where many ranches are located, is an important resource for migratory birds that lose their way during migration, as well as for resident birds and mammals. This same deficiency is reflected in the explanation of the Framework: Species other than those that are threatened and endangered, including resident, special status, and migrating species must also be included in surveys and discussions. Such a limited wildlife list does not support the explanation of the LMU's being "based on resource sensitivity" Which would need to include all of the native and migratory wildlife that depend on the rangelands. Other issues: Describe the "conservation pro-active standards" requirements. All units should be required to protect resources. One of the bullets under all but the Ranch Core alternative lists activities that would be subject to conservation standards, operational constraints and maintenance requirements." Please describe what activities are included in each of these Categories. 6. Elk/Wildlife Issues • Identify wildlife that may benefit from the presence/activities related to ranching, such as control of invasive vegetation via grazing practices, providing cropped grassland habitats. Conversely, describe those ranching activities that negatively impact existing wildlife species and native plants. Identify benefits to wildlife and habitat which would occur under different intensities and types of ranching (dairy farming, cattle grazing, crop farming) • A discussion of all wildlife species that use the 28,000 acres in ranching should be provided in the EIS. Population information and habitat requirements should be provided not only for endangered and special status species, but for migratory birds and resident species. • Some avian species benefit from low cropped grasses that result from grazing. Discuss species that are adapted to tall grasses and those to short grasses. What impact does ranching have on the wildlife that use these ranchlands? • The discussion of special status species should a discussion of the types of habitats each species requires and identify the general locations of the habitats. Include Tri-colored Blackbird. • What are the criteria being considered for managing elk by removing some elk from the Seashore? How decisions would be made to cull and/or remove elk from the park. • Describe and discuss other efforts at elk management in other National Parks or public lands. Have there been similar experiences in other parks? Are there experiences that would help guide decisions at Point Reyes? What is considered to be the carrying capacity for elk in the park? What is the basis for this number and what land area forms the basis for this capacity? Compare carrying capacities for each alternative. For each type of farming/ranching operation. • Discuss the potential for disease transmission from elk to cattle and vice versa. What is the current understanding of infection? 5. Ranching Issues • Discuss the current situation with overproduction of organic milk that could lead to a change in circumstances such as rancher's desire to diversify or leave agricultural production. Would the NPS's approach be to accommodate a farmer that cannot afford to continue a particular type of operation by allowing some other type of farming? • What are the requirements for ranchers leasing public land in the Seashore and GGNRA? Using public land should require a high standard of stewardship. What are ranchers responsible to provide/maintain in regard to building and facilities upkeep, fencing, fence repair if damaged by elk, residual dry matter requirements) grazing land health? • What services/benefits does the federal government provide, e.g. fixing fences etc.? • Discuss provisions of the Huffman bill (HR 6687) that provide for management of elk by hunting and relocation to Indian lands, and for leases to anyone interested if there is no family member interested. How is the NPS ensuring an objective environmental review? • Discuss impacts of provisions in the Huffman bill on the park's wildlife and habitats. • Discuss how HR6687 can allow for the consideration of alternatives, including "no ranching", if it guarantees 20 year leases. • What Indian tribes are known to be or possibly be interested in translocated elk, where they are located, and the reasons they would want the elk. The answers to these are needed for the NPS to make a responsible decision in the public interest. We will reevaluate our position in the light of any new information provided in the EIS and we welcome input from our members. Thank you for addressing our concerns.

#1354

Name: N/A, N/A

Correspondence: LUNNYRANCH November 30, 2018 Cicely A. Muldoon, Superintendent Point Reyes National Seashore One Bear Valley Road Point Reyes Station, CA 94956 Re: PRNS GMP Amendment 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 scoping letter. Also, to save space and avoid repetition, we incorporate by reference and support the points in the longer and much more detailed scoping letter submitted by PRNS and GGNRA Family Ranchers. We also support the "Community Alternative" and request that the EIS include and analyze the "Community Alternative". 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, similar to 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. However, 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, disced and planted 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, we are now limited to 180 acres for crop production, we are not allowed to choose which livestock to raise on our pastures and rangelands, we are not allowed to choose our crop type and we are not allowed to sell excess forage to our neighbors. 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 some of the ranchers, which has allowed those 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 where it is impossible to compete 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. The Lunny family appreciates

the PRNS attempt to create a range of alternatives to use in this EIS. Unfortunately, partially due to the settlement agreement requirements, the range of alternatives is not balanced. During the phase 1 GMP A EIS scoping period, comments that pointed out the fact that the alternatives were biased against ranching and not a full range of alternatives as NEPA requires, were included. Sadly, this deficiency was not corrected, and the biased alternatives remain. We understand that there should be a no action alternative. The problem is that the action alternatives include three very extreme alternatives that would reduce ranching, or end ranching altogether. To honestly show a full range of alternatives, the NPS should include an alternative that prioritizes cultural resource protection and ranching. None of the action alternatives would have the elk managed on the ranch lands in the pastoral zone in the areas around the Drakes Estero Trail. None of the action alternatives prioritize ranching. All action alternative include elk on the pastoral zone and none consider restoring ranching back into areas where grazing was eliminated by PRNS and where grazing would be beneficial to the grasslands and to the well-being of gateway communities if reestablished. This includes areas in the Olema Valley where fuel loads are increasing, and fuel ladders are forming up to the forested ridge abutting private land. We appreciate that the PRNS initial proposal includes ranching with 20 year permits, but are concerned that ranching may not remain viable because of the elk conflicts built into the proposed alternative (actually, all alternatives). The Lunny family still interprets the 1998 Elk Management Plan the same way that PRNS did in 2001 (Attachment A: 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. The Conservation Framework section of the NPS newsletter is severely problematic as written (see PRNS and GGNRA Family Rancher detailed comments, section V.). If a collaborative approach is used to characterizing LMU attributes, agreeing to the allowed uses and restrictions for each LMU classification, the framework could be a useful tool for programmatic approval of projects within the planning area. The creation of this new framework would benefit if PRNS would work with the individual rancher and a new, permanent Agricultural Advisory Committee as described in the Community Alternative (Attachment B). To facilitate the LMU boundary establishment, attached are maps of each LMU on the Lunny Ranch. The Lunny family looks forward to working with PRNS and, hopefully, the Agricultural Advisory Committee to identify special areas and special management recommendations within these LMUs that may be necessary. Upon reading the PRSRA scoping 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 actually be contributing to the elimination of the ranches and the loss of an important cultural resource. The Lunny family has specific plans for the Lunny Ranch that, if necessary, this EIS should evaluate so that PRNS can approve these changes in a long-term lease. The Lunny family plans 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 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.

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. 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 (which they will not), 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. In other words, as 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. Issues to consider are: a. This use existed on the G Ranch during the Shafter era; b. This use currently exists on the G Ranch; c. Acreage will be expanded from the current 6 acres to about 30 acres

which represents less than 3% of the G Ranch and a minute fraction of the overall agricultural properties within the planning area; d. Production will be located on land that is currently authorized for crop (forage) production, and no new areas will be converted to cropland; e. Production will focus on crop species that were historically grown during the Shafter era, including artichokes, beans and peas; and, f. Production will include dry-farming techniques.

2. Restore small scale hog production. Issues to consider are: 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; and, d. This use will avoid disposal of the above ranch resources.

3. Restore small scale chicken production. Issues to consider are: a. This use existed on the G Ranch during the Shafter era; b. The number of birds would be limited to 500; c. Both eggs and meat will be produced; 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.

4. Expand on farm organic composting. Currently, small scale composting occurs at the Lunny Ranch. Excess manure from neighboring dairies and green waste from PRNS could be co-composted. The Lunnys own and operate West Marin Compost in Nicasio, CA. Issues to consider are: a. The Lunnys are experienced and qualified composters; b. Soil nutrient balancing - reduce nutrient loading on dairy soils and add nutrients to soils in need of nutrients; c. Preserves organic matter & nutrients from PRNS and keeps them within PRNS; d. Facilitate carbon farming BL1Ps; e. Increase carbon sequestration; f. Reduce raw manure spreading; g. Eliminate odors; h. Composting kills weed seeds before spreading on pastures and rangeland; 1. Reduce GHG production from manure lagoons; J. Reduce GHG production caused by PRNS exporting green waste; k. Improve soil health; 1. Improve pasture health; m. Improve quality of storm water runoff; n. Improve collaboration between PRNS and the ranchers; o. Improve collaboration between ranchers; p. Help PRNS achieve stated GHG reduction goals; and q. Would take place within the ranch core area- within the feed lot area.

5. Build a roof over the feed storage area. Issues to consider are: a. Protection of feed from rain damage; b. Keeping birds, including ravens, away from the livestock feed; and, 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.

6. 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 was closed by the NPS. The NPS stated reasons for closure of the oyster farm 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 comes 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 also appreciate this new Lunny Ranch farm stand. Issues to consider are: a. This use has always been authorized within PRNS next door to the Lunny Ranch; b. Seashore visitors miss the opportunity they had before the closure of the oyster farm; c. The Lunny Ranch farm stand will sell and interpret products from the Lunny Ranch as well as products from other ranches within the seashore; d. Allows ranchers to collaborate at a location with safe egress and plenty of parking space; e. PRNS and other ranchers can participate in the educational components; f. Provides opportunities for the visiting public to connect with the working landscapes; g. Provides educational opportunities; h. Provides additional income to the Lunny family by capturing the retail prices of our farm products instead of only commodity wholesale prices; and, i. Requires new construction within the ranch core.

7. Continue to produce and harvest on-farm forage crops. Issues to consider are: a. This use existed on the G Ranch during the Shafter era; b. This practice is vital to the Lunny Ranch; and c. This use has continued to present.

8. Provide 2 new worker residences within the ranch building complex ranch core. Issues to consider are: a. This use existed on the G Ranch during the Shafter era; b. Provides 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.

9. 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 its removal by the NPS. We witnessed the visiting public absolutely cherishing 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.

IO. 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 ranchers to protect natural resources and to protect their businesses.

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.

b. **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. (See attached NRCS Water Development description.) 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 certified organic cattle will be provided cleaner water. The NRCS performed NEPA review for this project and approved the project. This EIS should specifically allow this project to be implemented.

c. **Composting**, using feedstocks from both on and off farm sources, and compost spreading. The Lunnys plan to continue to spread compost (from outside sources as well as on farm source) on silage producing areas, on vegetable producing areas, as well as on rangelands used solely for grazing.

d. **Carbon Farming**-The Lunny Ranch applied for a grant for a Carbon Farm Plan with the Marin County Resource Conservation District (MRCD). The Lunny Ranch was successful in obtaining the grant. The Lunny Ranch looks forward to working with the MRCD 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 of these practices 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 CO₂ and the increased soil carbon - - that result from implementing these practices.

e. **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, the Lunny Ranch had 7200 lbs. of RDM per acre in 2018 -the highest RDM measurement in all PRNS and GGNRA agricultural properties (Attachment C). This excessive RDM is damaging in several ways, including increased weed invasion, 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 - undergrazing 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 - RDM and/or other metrics. 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 inexperienced PRNS staff simply counting cows as the metric for grazing compliance can harm the very resources PRNS thinks it is protecting. This EIS should review the record at PRNS. The Lunny family has made multiple attempts to correct this management deficiency.

II. Greenhouse Construction - Although the Lunnys have temporarily fallowed the 6-acre irrigated row crop garden, for the past decade the Lunnys have had to depend 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. It will become even more

important when this EIS process approves the vegetable production area on the G Ranch to increase from 6 acres to 30 acres. The Lunnys request permission to build a small greenhouse on the G Ranch. This EIS should evaluate the addition of a greenhouse within the ranch core area of the Lunny Ranch. 12. 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. 13. 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 two licensed 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 written 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. 14. Cyclic Maintenance vs. Capital Improvements- Currently, the PRNS SUP describes and defines cyclic maintenance and makes clear that cyclic maintenance is the responsibility of the lessee (the rancher) and capital improvements are the responsibility of the lessor (PRNS). The above described construction projects would fall into the capital improvement definition. The Lunny family requests permission to perform and pay for the improvements and that the cost of the improvements be reimbursed over time by PRNS via lease fee reduction. This EIS should consider where responsibilities lie for ranch improvements maintenance, include it in the new 20-year renewable permits, and describe how the parties will be required to comply. 15. Lease I Permit - This EIS should consider the benefits of issuing 20-year renewable permits. Given compliance with the terms, the permits could be renewed each year for the next 20 years - a "rolling lease" similar to the California Williamson Act agreements. This EIS should evaluate the benefits, including: a. It would show a commitment by NPS and DOI that the historic ranching is important and will remain at PRNS; b. It would allow for long term ranch planning; c. The Lunnys would be more likely to invest in infrastructure repairs; d. The Lunnys would be more likely to invest in long term resource conservation practices including the carbon farming practices; e. The next generation of Lunnys would more likely be interested in continuing the Lunny Ranch tradition because of more security; f. Banks are more likely to offer loans for ranch projects; g. Agencies that require long-term monitoring agreements for resource conservation grants, including the Marin Resource Conservation District and the Natural Resources Conservation District, are more likely to award grants to the Lunny Ranch and other seashore ranchers, benefitting the natural resources found within the ranchlands at PRNS; and h. Ranches would likely be better maintained improving visitor experience. 16. Lease I Permit valuation needs to be considered by the EIS because the Lunny Ranch, after implementing this plan to improve visitor experience, resource conservation and historic activities, will increase its gross farm income. Currently, the PRNS has no process for lease valuation other than a farm building appraisal and forage usage (AUM consumption). The Lunny Ranch proposes that PRNS implement an agricultural lease valuation similar to the Cuyahoga National Park, with 20-year rolling agreements. Here, we ask that the EIS consider the effects of charging a minimum annual rent I permit fee equal to the current fees charged to the ranchers. A separate calculation could be a 3-5% of gross farm income charge for rent. For example, if 3% of gross farm income is less than the current rent, the rancher pays the minimum rent. If 3% of gross farm income is higher than the current (minimum), the rancher pays the higher - 3% of the gross farm income. The EIS could consider the public benefit of charging the ranchers with the most intensive land uses more rent. The EIS could analyze how this method of charging rent I permit fees could: a. Charge more rent to those of us that would like to add value to our farm products through diversification; b. Keep the current rent stable for ranches with small gross farm income; c. Be fairer to all ranchers if all ranchers were paying the same percentage rent; d. Be revisited and adjusted every 5 years; e. Allow ranchers and the public to know what the rates are and that they are applied evenly; f. Allows ranchers to plan, knowing how rent would be affected by diversification and other management changes; g. Calculate gross farm income, how the information can be obtained and how the information, tax returns or other, can remain confidential; and h. Eliminate the need for expensive appraisals and inappropriate charges based only on AUM calculations. 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, long-term permits are being developed, the Lunnys want to be sure that each of the items raised by PRSRA, the PRNS and GGNRA Family Ranchers detailed scoping and the Lunnys during scoping, are authorized and incorporated in the new Lunny Ranch - Historic G Ranch lease I permit. 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. This simple 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. If 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 are simply replacing a small portion that has been lost over time. They probably wouldn't notice the increased soil carbon offsetting their GHG produced by their automobile during their visit to the seashore. The new seashore visitors probably wouldn't 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 its diversification makes it much more resilient and more likely to survive through changing economic times and changes to the pasture productivity due to climate change. This 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 onfarm 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 - all a small demonstration of the true historic use the Historic G Ranch on the Point Reyes Peninsula. This EIS should consider the fact that PRNS and the NPS have allowed all or most of these uses at PRNS and at other units of the NPS. The EIS should evaluate the restoration of these historically appropriate ranching 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 appears to meet all NPS objectives at PRNS - 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. The Lunny family pledges to work with the team preparing this EIS to answer any questions regarding the Lunny Ranch farm plan. Sincerely, The Lunny Family

*Attachments in hard copy

#1355

Name: Huffman, Jared

Correspondence: November 29, 2018 Cicely Muldoon, Superintendent Point Reyes National Seashore 1 Bear Valley Road Point Reyes Station, CA 94956 Dear Superintendent Muldoon:

Thank you for this opportunity to provide my scoping comments on the notice of intent to prepare an Environmental Impact Statement (EIS) for a General Management Plan Amendment (GMP) for Point Reyes National Seashore and the north district of Golden Gate National Recreation Area (GGNRA). Updating the management guidance for more than 28,000 acres of National Park Service (NPS) lands including all lands currently leased for ranching is an important endeavor, and I am pleased to see you are planning a robust process with plenty of opportunities for public participation. For over 150 years, agriculture has been a vital part of the fabric of West Marin. That includes the historic ranches and dairies in the Point Reyes National Seashore (Seashore), which contribute to the special history, character, and appeal of this magnificent national park unit. This is reflected in the recent designation of seventeen ranches and approximately 150 structures included in the 22, 237-acre Point Reyes Peninsula Dairy Ranches Historic District located in the Seashore. The agricultural properties in the Seashore are vernacular cultural landscapes that evolved through use by the people whose needs and activities shaped them. While ranching practices continue to evolve, the fundamental distinctive characteristics of these landscapes have existed for many generations and have become an integral part of the

cultural and scenic resources the NPS is charged to conserve unimpaired as part of its mission. These ranches and dairies also provide broader benefits: they help preserve agriculture outside the park boundaries by ensuring that our regional agricultural economy, consisting almost entirely of small-scale agricultural operations, remains large enough to support the facilities and services that are necessary for most of these ranches, dairies, and farms to stay viable. The statutory history of the site reflects that Congress showed great vision by providing for ranching to continue within the Seashore to ensure that future generations would be able to experience the park's unique working landscapes. And, since the inception of the Seashore, NPS management of the ranchlands has been consistent with that vision. As you know, in November of 2012, the Secretary of the Interior reinforced the commitment of the federal government to this vision by directing the NPS to pursue the issuance of agricultural lease I special use permits for renewable terms of up to 20 years. That vision, and the many benefits it represents for the park and our region, is worth protecting. I am writing to once again express my firm commitment to ensuring that these historic working ranches remain an enduring part of the Seashore and are managed using the best environmental practices. Reducing conflicts between the growing Tule elk herds and the park's historic ranches and dairies is essential for NPS to maintain the historic, cultural, and scenic resources and values of the Seashore. The successful reintroduction of the majestic elk to the Seashore is good for park visitors and speaks to the health and abundance of the park's natural environment, but the growing number of elk taking up permanent residence on working ranches and dairies - - damaging fences and equipment, and competing with cows for carefully managed organic forage on ranch lands - - is a serious problem for ranchers now and will certainly lead to further impairment of the working ranches. While I appreciate that the "NPS Proposed Action" (Continued Ranching and Management of the Drakes Beach Tule Elk Herd Alternative B) illustrates NPS' interest in retaining ranching, I do not support the management of elk described in this alternative. Given the current resource challenges facing NPS, such as the nearly \$12 billion backlog of deferred maintenance and the proposed 11 % cut in the Trump Administration's Fiscal Year 2019 budget, it is unrealistic and naive to think NPS can manage a large new herd at Drakes Beach. The very presence of the growing new Drakes Beach herd on the ranches and dairies shows a lack of capacity to manage them well in the first place. NPS should not resign itself to accepting the establishment of a third herd where Tule elk linger on working ranch lands because of the prime forage the ranches afford, share watering troughs and feed bins with cattle, and inevitably damage fences and harm or kill cows - this is hardly the type of natural, free-ranging elk herd envisioned in the 1998 Elk Management Plan. Moreover, if the continuation of some type of Drakes Beach herd is contemplated, it must be significantly smaller than the current herd to prevent unacceptable conflicts and to ensure that NPS is actually able to manage it. The NPS should protect both free range Tule elk and the historic ranches and dairies through strategies to ensure effective separation of the elk from the working ranches in the Seashore. Less than 30% of the 86,000-acre planning area is in agricultural use. Tule elk belong in the fenced wilderness reserve on Tomales Point and in the unfenced Philip Burton Wilderness, which together comprise 33,000 acres of the total 71,000 acres of the Seashore, not on working ranches. With consideration for a phased reduction of elk at Drakes Beach, NPS still has time to avoid establishment of a herd in this ranching area that would be too large to manage or control. The NPS should give serious consideration to exploring all options to remove animals from the ranches, paying careful attention to the best science and environmental practices, and the California Department of Fish and Wildlife's commitment to working with federally recognized Tribes that are seeking to re-introduce Tule elk population on tribal lands within the historical range of elk and as described in its Draft Elk Conservation and Management Plan (2017). The Draft Elk Conservation and Management Plan acknowledges the need for more research to understand the minimum viable population size for elk herds. It also considers problems associated with limited genetic diversity for long-term viable herd size. Allowing the establishment of a brand new "herd" in the Drakes Beach ranching area, letting it grow to more than 100 animals, and then citing genetic diversity models to justify growing it further to 100-160 animals as noted in the Proposed Action, is arbitrary and unacceptable. If a herd in the Drakes Beach ranching area is contemplated, the Park Service should start from the realization that it must be substantially smaller to avoid unacceptable impacts. If genetic diversity in a herd of that size is a problem, strategies such as relocation could be utilized. Given the conflicts already present at Drakes Beach, the Park Service should dispense with the notion that an even larger herd in that location could be made to work. NPS should exercise caution as it contemplates a conservation framework to avoid establishing a strict formula based method to managing the unique landscapes in the planning area. Adaptive management and flexibility guided by specific and measurable objectives are paramount to sound land management, and should be applied to the unique landscapes of each of the working ranches and dairies. For example, some pasture management in the 'range' zone may be necessary to preserve both the scenic landscapes evaluated by taking into account the historic

use of the land and best environmental practices. In that context, on some ranches, some types of diversification might be more appropriate in areas outside the 'Ranch Core' as described in the proposed zoning framework in the scoping materials and should certainly be eligible for consideration. The planning process offers a good opportunity to strengthen environmental stewardship on the working ranches and dairies on our public land. We are lucky to have wonderful resources and existing local expertise in this community provided by the Natural Resource Conservation Service as well as our Marin County Department of Agriculture, the Marin Resource Conservation District, and UC Extension, which can contribute knowledge about best practices and environmentally-sound agricultural practices. The ranchers have worked hard to showcase stewardship practices to the community at large and to educate them about the challenges facing small family ranchers, many of whom now operate organic ranches and farms. The positive relationships that formed during the former Ranch Management Planning Process have only grown stronger over time and are a reflection of the local community support for preserving the cultural practices these working ranches provide. I fully expect these community resources will continue to be available for NPS during this planning period and beyond. With respect to topics to be addressed in the planning process related to socioeconomics, I encourage you to explore opportunities for workforce housing with a priority for the farm and ranch employees in the Seashore where appropriate. As you are well aware, the need for affordable housing in Marin County is profound and even modest contributions are important for consideration. I understand the challenges presented by the litigation and July 2017 settlement agreement to the ranchers and NPS, but I believe long-term leases that protect the Seashore's environmental values and which sustain the historic ranches and dairies as an essential part of the cultural and scenic resources at the Seashore should prevail. The loss of ranching would end a valued cultural practice that is one of the fundamental purposes of the Seashore and destroy the scenic beauty and natural character of the area. The iconic scenic view of pastures in the Seashore are not natural; 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 will be greatly diminished. That result can already be seen in areas where cattle grazing ended within the past few decades. As this process moves forward, I will continue to engage as a partner to ensure it leads to long-term solutions that conserve park resources and values, preserve our historic ranches as part of that cultural resource, and support the free range Tule elk.

Sincerely, Jared Huffman Member of Congress

#1356

Name: Hoffman, Philip

Correspondence: I AM FOR ALTERNATIVE E. BACK TO WILDERNESS. THANKS.

#1357

Name: Mihan, Ralph

Correspondence: My Comments: After spending 37 years directly participating in the acquisition of the ranches and dairies in the "pastoral zone" and those in the Olema Valley and elsewhere in the northern portion of GGNRA and defending their existence in the Seashore and GGNRA, I strongly support the long range retention of the Pastoral Zone ranches in the Seashore and the ranches of the northern section of the GGNRA. The urge NPS to adopt Alternative B. The ranches and dairies are a historical culture protected by the legislation of the Point Reyes National Seashore and Golden Gate National Recreation Area. The ranches and dairies must receive 20 year leases to make their operations sustainable now and for generations to come. Further, to provide public understanding and benefit for better support of the existence the ranches and dairies, I recommend that NPS incorporate the following points in the GMP Amendment. ONE: TRAILS There should be a planning concept of public pedestrian hiking trails (not bikes or other mechanical conveyances) in the ranch scenario as suggested by the following: - north - south trail from Tamales Point to Palomarin near Bolinas - east to west trails - just to name a few: - from Marshall Beach on Tamales Bay to the Kehoe Beach on the Pacific Ocean, - from Hearts Desire Beach in Tamales Bay State Park to Abbotts Lagoon on the Pacific Ocean - just to name a few In the ranch/dairy scenario, public trails can be facilitated by including the issuance of new 20 leases with a new provision that roughly says: "The NPS (as owner of the land) reserves the right to establish public pedestrian hiking trails under

this lease. Said trails shall result in the least disruption to the lessees operations." That provision as well as its implementation will have to be well thought out and well planned in coordination with each ranch/dairy lease holder. Where appropriate and possible, said trails can be along fence lines and/or along existing ranch roads, thereby causing the least disruption to the leasehold operations and natural resources disturbance. TWO: CAMPGROUNDS The planning process under Alternative B should establish within the Seashore and northern part of GGNRA, campgrounds for public camping. There is very minimal affordable overnight facilities in West Marin for families to stay overnight so they can fully enjoy the wonders of the Seashore and northern section of GGNRA. Campgrounds to serve the many visitors are an essential visitor services. Suggested sites now potentially available are: - the D Ranch bluff overlooking Drakes Beach. That will be very strategic for visitors with close proximity to service and facilities offered at Drakes Beach. - The Wilkins Ranch (Rancho Solinas) on the southern entrance to the Olema Valley and the Seashore offers a excellent location for campground. The California Coastal Conservancy now offers funding for overnight public facilities for visitors to public lands that is available to NPS. After all the Coastal Conservancy provided funds toward the restoration of the Giacomini Wetlands. Ralph G Mihan Retired counsel to the Seashore and Recreation Area. Former PRNSA Board Member and now PRNSA Advisor

#1358

Name: Zegart, Margaret

Correspondence: Both the 17 dairy farms and appropriately managed elk herd are appropriate for this GGNRA Seashore .: Dear Golden Gate National Seashore Planners THE Wilderness Designated RETURNED HERD OF TULE ELK and the historic dairy farms are consistent with The International Union of Conservation and Natural Resources (ICUN), developed to include world-wide best protected and managed significant historical, cultural or especial ecosystems and historic sustainable business ventures. The CUN identifies and defines them under six categories. Category IB and VI are relevant "IB Wilderness Area: Large protected area of land or sea managed mainly for wilderness protection and without permanent or significant habitation. VI Managed Resource Protected Area: a protected area managed mainly for the sustainable use of natural resource systems. An area containing predominately unmodified natural systems, managed to ensure long-time protection and maintenance of biological diversity, while at the same time providing a sustainable flow of natural products and services to meet community needs." I Also, as you review the 1993 advice to manage the herd size of introduced tule elk to the Point Reyes Seashore National Park along the western Marin seashore to order to create a sustainable grazing pattern for both dairy cattle raised relationship by the Parks historic agricultural dairy farms and the majestic tule elk herds, stipulate that herd size should not be done without killing of identified dominate males that are needed to continue health of the herd. Do not use the fall rutting season for the time to cull the herd,. Normally hunters aim for the largest specimens so if this reduction method is considered, specific scientific guidelines should for the aged or weakened elk. This culling shall be not done during mating season (usually early fall I September for west coast herds).

#1359

Name: Hoffman, Walter

Correspondence: I AM IN FAVOR OF ALTERNATIVE F.

I WOULD LIKE TO SEE ALL OF THE NATIONAL PARK RETURNED TO WILDERNESS AS IT ONCE WAS 200+ YEARS AGO.

#1360

Name: Ghisletty, Harold and Bonita

Correspondence: I agree with and support The Community Alternative: Continued Ranching and Manage Elk for Effective Separation From Ranches Based on the purpose and need for action, the Community proposed action includes the following elements: • Issue agricultural lease permits with 20-year terms to existing ranch families to continue beef and dairy and associated agricultural operations on approximately 27,000 acres within the planning area. 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. Explore opportunities for ranch operational flexibility and diversification, establish up to approximately 900 acres of collaboratively managed resource protection buffers, and provide a programmatic review and approval process for operational flexibility, diversification and best management practices. Tule elk would be managed for effective separation from ranches. No elk herds would be allowed to establish in the planning area. The NPS would implement a strategy prioritizing maintenance of historic buildings on ranches in collaboration with seashore ranchers. Prioritization would take into account historic preservation goals and the needs of ranch operations. In some cases, adaptive reuse of historic buildings would be considered to support diversification activities. NPS would implement strategies to remove non-native, invasive plants and to manage special status plants in collaboration with seashore ranchers. Strategies for the management of historic ranch complexes within the planning area but not part of currently active ranch operations would be identified including: prioritization of specific buildings, structures, and landscapes for preservation based on their importance to the overall integrity of the historic district and opportunities for adaptive reuse. As appropriate, the seashore would evaluate potential for decommissioning/deconstruction of low priority or substantially degraded structures/complexes as part of this plan. The community proposed action represents one alternative that should be considered during the EIS process. Thank you for the opportunity to provide these comments.

#1361

Name: Gregg, Louis

Correspondence: Dear Point Reyes GMP Amendment EIS Superintendent- 1. Hire and House Mewok Indians as Rangers and as Interpreters for the Mewok Village. 2. Ranchers need to protect wildlife and their habitat or we need to opt for F "No Ranching in The Park." 3. Enforce all laws in The Park. 4. Protect Riparian Setbacks. 5. Protect western dog violets that host the Silverspot Butterflies. 6. Protect the Birds that nest in the field where ranchers mow for silage. 7. Deal with Dogs- Build a Big Dog Park to stop dogowners and their dogs from taking over Public Beaches and Disturbing The Threatened Western Snowy Plovers. Thank you, Louise Gregg

#1362

Name: Martinez, Erik

Correspondence: The Coastal Commission staff has reviewed the above-referenced Notice of Intent (NOI) to Prepare an Environmental Impact Statement (EIS) for a General Management Plan Amendment for lands currently leased for ranching within Point Reyes National Seashore and the North District of Golden Gate National Recreation Area (planning area). The National Park Service (NPS) is seeking comments concerning the scope and content of the environmental information to be included in the EIS. As discussed with Brannon Ketcham of your staff on November 8, 2018, because the proposed General Management Plan Amendment (GMPA) includes actions that would potentially affect coastal resources, the NPS will need to prepare and submit to the Commission a consistency determination (under the provisions of the federal Coastal Zone Management Act(1)) which documents that the GMPA will be implemented consistent with the California Coastal Management Program. Ideally, the consistency determination should be submitted along with the Draft EIS, a summary of public and agency comments on the DEIS, and NPS responses to those comments. The consistency determination can reference information and analysis contained in the Draft EIS to support the conclusions made in the determination. The Commission staff will work with your staff on scheduling the timing of the consistency determination submittal to fit with your schedule for completing the GMPA process. The Commission staff submits the following comments on the NOI. The NOI includes a preliminary list of topics to be analyzed in detail in the EIS, including visitor use, experience and access, water quality, and wildlife. A primary objective of the Coastal Act is to protect public access to and recreational uses of the shoreline. Therefore, the EIS should thoroughly examine any potential impacts arising from the GMPA ranching operations and elk herd management on the public's ability to enjoy access and recreation opportunities to and along the shoreline within and adjacent to Point Reyes National Seashore and Golden Gate National Recreation Area (Coastal Act Sections 30210-30213), and in consideration of the provisions of Section 30214 that access be implemented in a manner taking into

consideration such matters as carrying capacity, habitat and geologic constraints, private property rights, and sensitive habitat needs. The Coastal Act also includes policies that provide broad protections for water quality and marine resources and requires that biological productivity and healthy populations of all marine organisms be maintained, enhanced, or restored where feasible (Sections 30230-30231). The EIS should examine the GMPA's consistency with these policies, specifically, the potential impacts to coastal water quality and marine resources resulting from ranching, other agricultural operations, and elk herd management that would occur in the planning area. The EIS should also examine potential impacts arising from implementation of the GMPA on environmentally sensitive habitat areas (e.g., wetlands, riparian corridors) and on wildlife species within those areas, including those species that transit beyond the boundaries of the federal parklands (Section 30240). Finally, the Draft EIS should also state that the NPS will prepare and submit to the commission a consistency determination for the GMPA. Thank you for the opportunity to comment on the subject NOi. Please contact me or Larry Simon if you have any questions regarding this matter.

#1363

Name: Knowles, Cybele

Correspondence: Dear National Park Service,

Enclosed please find a copy of 4,559 comments from supporters with the Center for Biological Diversity urging you to protect tule elk and other native wildlife at Point Reyes National Seashore. This area is a national treasure, and tule elk recovery here has been an immense success. It's time to update the Point Reyes management plan in keeping with the Park Service's mission to protect wildlife and the public's enjoyment of this area. Toward that end, the enclosed comment oppose any killing or removal of tule elk, or "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 due to conflicts with native predators. It would likely lead to the killing of the park's bobcats, foxes, coyotes and birds. The Center and our supporters urge you to adopt Alternative E. This option would phase out dairy ranching in the park while allowing some beef ranching to continue. And it would not remove or kill any tule elk. The important thing is to make sure there's enough grass for the elk to eat and to reduce cattle numbers where lands are overgrazed or polluted. 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 ranching families retire. Thank you for your consideration of the enclosed comments.

#1364

Name: Schnapf, David

Correspondence: These comments are submitted in accordance with the notice published in the Federal Register on October 31, 2018, soliciting input on alternatives that you will examine in conjunction with the General Management Plan Amendment ("GMP Amendment") for the Point Reyes National Seashore and north district of Golden Gate National Recreation Area (collectively "PRNS" or "the Park"). I submitted comments a year ago in response to a similar notice, but I am unclear whether those prior comments have been, or will be, considered in connection with the update to the GMP Amendment. Therefore, these comments reiterate and supplement my prior comments. I note that, contrary to legal requirements, the GMP for PRNS has not been updated since 1980, and that the present review is being undertaken only because of a lawsuit over this legal failure. As an avid outdoor enthusiast I am a frequent visitor to PRNS. The Park is a unique place, providing a wealth of nature experiences that are not available elsewhere. Highlights of my visits include viewing the wonderful array of wildlife that can be seen in and around the Park - elk, whales, elephant seals, harbor seals, sea lions, all sorts of birds, and even a badger, to name just a few. The tule elk herds are a particularly rare and majestic sight. Since my first visit to PRNS in 1980, I have been appalled to see the extensive and destructive intrusion of ranching in the Park, and the extensive ranch fencing that keeps much if not most of the public park off limits to visitors. This is wholly contradictory to the core purpose of any National Park, which are set aside as nature and wildlife preserves. Ranching Alternatives In my opinion, there is no valid justification to maintain any ranching in PRNS. I find it highly inconsistent that the Park Service aggressively moved to eliminate oyster growing as being unnatural, while continuing to allow widespread ranching - an activity that is far more destructive to the Park and to its wildlife. I

understand that a representative of a former administration purported to make a "deal" with the ranchers, promising to leave them alone, in exchange for shutting down the oyster farm. Such a "deal" has no legal effect and cannot absolve the Park Service from complying with federal environmental law. Over the years the NPS has shown a clear bias in favor of continued ranching. This bias is quite evident at the very outset of the process for the GMP Amendment - the core proposal would allow continued ranching. None of the continued ranching alternatives suggests any public interest or benefit in allowing continued ranching. None of the continued ranching alternatives addresses the long term future of ranching or suggests that eventually ranching should be reduced or eliminated. None of the continued ranching alternatives makes any mention of public access to ranch lands or to the ranches themselves. The alternatives generally reflect continued bias in favor of ranching. I believe that the Park Service is wrong as a matter of law in stating that the "no action" alternative required by NEPA would allow it continue to issue short term leases to ranches, as it has been doing in the past. By renewing the leases the Park Service would be taking the specific actions that would impact the environment. Moreover, the Park Service is required by law, and by its settlement agreement, to update its GMP apart from its obligations under NEPA. The proposed "no action" alternative is defective insofar as it would violate the Park Service's legal obligation to deal with the future of ranching in the GMP Amendment. The "no action" alternative should, correctly, be viewed as meaning no further lease renewals. Accordingly, I believe that the range of alternatives that would allow ranching should be restricted to only those required by the Settlement Agreement. There is enough flexibility in the settlement agreement that additional ranching alternatives are not required and will only make the review process more difficult, expensive and time consuming. Moreover, any alternatives that would allow continued ranching should be based on the requirement that ranch leases be set at full market rates in the region. There is no justification for the Park Service to be directly or indirectly subsidizing private businesses in a national park, particularly businesses, like ranching, which detract from the public's enjoyment of the Park. For example, any alternatives allowing ranching should require the ranches to bear the expense of maintaining roads and other Park facilities in and around their land. Presently, the road to the Pt. Reyes lighthouse is in constant need of repair due to the heavy truck and commercial traffic generated by the ranches. There is no reason the public should pick up the tab for maintaining roads damaged by the heavy duty equipment used in ranching. In addition, the ranching alternatives should require maximum public access to ranch lands, and require all ranchers to establish demonstration projects for visitors. Non-ranching Alternatives PRNS is one of the most popular park destinations in the Bay Area, attracting visitors from around the world. These visitors do not come to PRNS to see cows, they come to see nature. I believe that the process for the GMP Amendment should examine additional alternatives that would enhance visitor accessibility and highlight the unique experiences that PRNS has to offer. For example, the establishment of additional campgrounds, hostels and the like would enable more visitors to enjoy the Park. Perhaps some of the old farmhouses can be converted to inns or B&Bs. Activities and businesses related to, for example, backpacking, kayaking, fishing, boating, cycling, and horseback riding, would be encouraged under an alternative aimed at providing more recreational access and variety. The growth of the West Marin tourist industry, particularly around PRNS, has been steady. Enhancing the visitor experience would help support this growth. Thus, the GMP Amendment process should include consideration of at least one alternative that promotes recreational and overnight access to PRNS. Regional Impacts of Ranching Any analysis of ranching in the Park must consider not only the environmental impacts of continued ranching within the Park, but also the regional impacts. It has become increasingly clear that the regional dairy industry is under intense economic pressure due to overproduction, and that contraction in the amount of land devoted to dairy ranching is likely to occur. Attached is an "Op-Ed" piece published in the Marin Independent Journal newspaper on August 9, 2018, authored by the CEO of the Marin Economic Forum, which is considered an authority on the Marin economy. The article states: "Most Marinites are familiar with the history of our county's dairy industry, ... However, many of us may be unaware of the current market conditions that are impacting the industry's bottom line and posing a serious threat to its long-term economic sustainability. In short, Marin County's dairy farmers are in trouble - some even say there is a crisis - and it is being reported that some farms in West Marin and Sonoma may not survive." There is little doubt that there will be a contraction of the regional dairy industry, and that land currently used for dairy ranching will be converted to other uses. Dairy ranches within PRNS directly compete with ranches outside the Park in a diminishing market. The subsidies enjoyed by ranchers within PRNS give them an unfair competitive advantage, and continued dairy operations in PRNS could be the death knell for other dairy ranches in the region. The Park Service needs to determine whether continued dairy ranching in the Park will contribute to the failure of ranches elsewhere in the region, and understand the environmental consequences that would ensue from a contraction of the dairy industry outside the Park. In an area of high real estate demand, it is

foreseeable that dairy ranches outside the Park that do not "survive" would be converted into suburban development in Marin and Sonoma counties, further overburdening our roads, schools and other infrastructure. I note, on the other hand, that the elimination of dairy ranching in PRNS would help ensure that regional dairy farms outside the Park survive. Thank you for your consideration. Attach.

Most Marinites are familiar with the history of our county's dairy industry, an integral component of Marin's economy, identity and landscape for over 150 years. However, many of us may be unaware of the current market conditions that are impacting the industry's bottom line and posing a serious threat to its long-term economic sustainability. In short, Marin County's dairy farmers are in trouble - some even say there is a crisis - and it is being reported that some farms in West Marin and Sonoma may not survive. It's important for all of us to thoughtfully consider what the industry is experiencing and what we can or should do about it. The county's agriculture/food industry as a whole is identified by the Marin Economic Forum as one of the county's priority industries based on criteria that include revenue generation, exports, five-year growth and output per worker. Dairy has been the county's top commodity for decades and, with Albert Straus opening the first certified-organic dairy farm in the West, has helped establish Marin as a leader in the organic food movement. Last year organic milk and conventional milk accounted for approximately 39 percent of the \$87 million in agricultural production (organic milk comprising about 80 percent of total milk production). Additional agricultural output in Marin comes from beef, livestock (especially poultry), cheese, crops and related agricultural production. Marin's forward-thinking organic farming drew attention from the global dairy market and positioned the region to develop other valuable products and brand extensions. While the industry is growing beyond milk, product diversification and extension development that would have helped balance the economic dominance of milk have been relatively slow. Our cheese industry is one example of a product extension success story, offering rich secondary market value; however, the volume is not yet large enough to offset the economic dominance of our milk production. For years, organic farming offered a competitive advantage for Marin producers, with organic milk commanding a 72 percent premium over non-organic (conventional) milk. By 2015 - an historic year - gross agricultural value was a record high \$111 million for the year. But, like any investment, there is risk in reliance on just one commodity and for Marin farmers, the current challenge is two-fold. First, milk consumption nationwide has declined significantly with a change in consumer habits - mostly a decline in breakfast consumption - and the turn to non-dairy substitutes (such as soy and almond milk). Second, the market is awash in an exponentially larger supply of organic certified milk. With the sharp market turn toward organic purchases, dairy farmers across the nation joined the movement and converted to organic, causing a market flood that brought milk prices down. Marin County's total gross agricultural production value was down 24 percent from 2015 in 2016 and declined further by 10 percent in 2017. For those interested in supporting the survival of our local dairy farmers in the short term, there has never been a better time to buy local organic milk, cheese and other products made in Marin and Sonoma counties. In the longer term, to avoid another industry crisis, diversification and planning will be important to our farmers, including innovations in crops and production systems that contribute to healthy soils and the environment. You are supporting these innovations through your purchase of local dairy products. Finally, in any industry, it is considered highly beneficial to nurture an innovative ecosystem that allows for sector interaction, support, sharing of information, market updates, resources and training. Marin is already positioned as a leader in the organic food movement and is poised for market expansion through the development of value-added product innovations leveraging a strong Marin brand and the values and lifestyle our county represents. We could all do better to support the industry through stronger partnership and promotion. Agriculture is clearly a culturally important industry in the North Bay, representing our history and identity, and has provided enormous benefit to our community over the years. Combined with our burgeoning food and beverage industry and our complementary outdoor adventure lifestyle, the agriculture industry is a potential powerhouse not to be ignored and should be helped through this difficult time with stronger support from our community and its leadership.

#1365

Name: Schoonover, Steven

Correspondence: Dear PRNS Madam/Sir: I understand you are considering expanding mountain bike access to areas in the Point Reyes Nat'I Seashore. This is a very bad idea. I ride a road bike. Is it hazardous - well it can be. Or it isn't, depending. I've ridden in the Point Reyes Nat'I Seashore. It's not hazardous (is there evidence otherwise?), so the argument that added access must be provided bicycles is without foundation and is being used to assure MCBC's conquest of PRNS lands. Mountain bikes displace hikers. That fact has been seen for years in other parts of Marin. Additionally, the MCBC needs to produce a credible study proving that increases in mountain bike use has no deleterious effect on flora and fauna. A detailed study needs to be done in an EIR before this proposal goes any further.

#1366

Name: Sideman, Jill

Correspondence: Dear Superintendent<

I am writing to express my concern about the Park Service plans to possibly relocate the tule elk and kill/cull them to protect ranchers in the National Seashore. The elk need to be there and to be protected. Therefore, I am requesting your consideration for the following points: Do not relocate elk out of the park; Do not use lethal management practices: National parks should not be used for commercial/economic purposes including ranching in perpetuity or for the long term; Do not allow commercial expansion such as poultry or other domestic animals in the park. Thank you for your consideration. Sincerely,

#1367

Name: Miller, Jeff

Correspondence: Point Reyes GMP Amendment EIS Superintendent Point Reyes National Seashore 1 Bear Valley Road Point Reyes Station, CA 94956

Re: Scoping Comments for EIS on GMP Amendment for Point Reyes National Seashore and GGNRA Lease Areas

The Center for Biological Diversity submits these scoping 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). The Center is a nonprofit conservation organization with more than 1 million members and supporters, dedicated to the protection of native species and their habitats through science, policy, and environmental law. The Center has worked to protect native wildlife and their habitats and other environmental resources of the Bay Area for more than two decades.

It is appalling that the National Park Service, whose mission 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 evicted or shot. It is equally disturbing that the Park Service is considering allowing additional agricultural uses to be introduced into the parks which are sure to cause further conflicts between ranchers and native wildlife.

With some caveats, the Center generally supports the EIS Alternative E, which would phase out dairy ranching but allow continued beef cattle ranching, with no major actions to limit elk populations or range in the park. Alternative E would continue the current acreage of PRNS and GGNRA ranching operations, but without dairy ranching; it would allow current dairy cattle leases to switch to beef cattle. Should the Park Service choose Alternative E, it should include a mechanism for retiring grazing leases on current lease lands where natural resource protection and public access should take priority. The NPS must provide accounting of available forage and cattle use of forage, so that elk and other native wildlife are assured adequate forage, even during drought years. Grazing leases should be modified to reduce cattle stocking levels and numbers where overgrazing,

excessive erosion and water pollution are issues, and to protect endangered species habitats. Grazing leases must also include enforceable grazing lease conditions and buffer areas to protect natural resources.

The Park Service should not allow, under any alternative, agricultural "diversification" of any kind; allowing ranchers to introduce new livestock animals into the park, such as chickens, goats and sheep, or to grow agricultural crops would inevitably lead to conflicts between ranchers and the park's native wildlife, and could lead to killing of birds and native predators.

The Center has identified the following issues and questions which must be addressed during the EI for the GMP amendment. The Park Service needs to analyze any existing data and information, but is also required to conduct any studies needed to inform the public of the full environmental impacts of agricultural leases and elk management strategies. The Park Service is required under the National Environmental Policy Act, the National Park Service Organic Act, and the Point Reyes and GGNRA enabling legislation to choose a management alternative that does not impair the natural values of PRNS and GGNRA lands, and to determine which management alternatives and actions provide maximum protection, restoration, and preservation of the natural environment. Alternatives E and F are the only alternatives which meet these criteria and are the environmentally superior alternatives under NEPA

Laws Governing the GMP Amendment and Park Management

The NPS Organic Act (54 U.S.C. § 100101) requires the Park Service 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." The Ninth Circuit has held that this 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 Point Reyes enabling legislation requires PRNS to be managed "without impairment of its natural values, in a manner which provides for such recreational, educational, historic preservation, interpretation, and scientific research opportunities as are consistent with, based upon, and supportive of the maximum protection, restoration, and preservation of the natural environment within the area." (16 U.S.C. § 459c-6) The GGNRA enabling legislation is similar to the PRNS statute and the Organic Act regarding protection of natural resources: "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)

The Secretary of the Interior has discretionary authority for entering into leases for ranching in the PRNS legislation, but such discretion is explicitly limited by the Organic Act requirement to leave natural resources unimpaired and the purposes of the PRNS: "such lease shall be subject to such restrictive covenants as may be necessary to carry out the purposes of sections 459c to 459c-7 of this title." (16 U.S.C. § 459c-5)

Purpose

The stated purpose of the General Management Plan Amendment is to "establish guidance for the preservation of natural and cultural resources and the management of infrastructure and visitor use within the planning area" and also "address the future management of tule elk and leased ranch lands." The purpose should be expanded and the EIS should state that the goal of the GMP amendment is management that is consistent with the Organic Act and the PRNS and GGNRA enabling legislation. Proposed Alternatives

Alternative A: Continue Current Management

This no action alternative would continue existing ranching operations under 5 and 10 year permits on approximately 27,000 acres. Given the Park Service's ongoing failure to adequately protect natural resources under current grazing leases, and continual violations of current grazing lease conditions, this alternative would not meet the purpose of the GMP amendment. This alternative would not adequately address the conflicts between ranching operations and elk.

The EIS should discuss the adequacy and inadequacy of protection of natural resources under current lease operations (including ranching impacts on water quality, soils, wetlands, riparian vegetation, endangered species, and invasive plants); detail the history of compliance or lack of compliance with current and past grazing lease conditions; and discuss NPS enforcement and lack of enforcement regarding grazing lease violations.

Under this alternative "resource protection buffers" would be established on a "case-by-case basis." The EIS should explain where and how large these "buffers" would be, what resources they would be protecting, and what ranching activities would be allowed in these buffer areas. The EIS should also explain the methodology for determining appropriate buffer areas.

The Park Service would "work with ranchers to implement best management practices to protect sensitive resources, including water quality and rare and endangered species." The EIS should explain what these best management practices are and how they would be enforced.

The Park Service would "work with ranchers to monitor and manage invasive non-native vegetation." The EIS should explain what invasive vegetation management will be used, and the role of cattle grazing in spreading and in controlling invasive plants of concern.

The Park Service would "work with ranchers to adjust timing and duration of grazing as necessary to meet management goals and objectives." The EIS should explain what these management goals and objectives are; natural resource protection goals and objectives may conflict with ranching operation objectives.

The alternative would continue current elk management practices, and states that "management of free-range tule elk affecting park ranch lands would be limited." Yet the alternative includes hazing of elk as a management strategy, which would require ongoing and useless harassment of elk that will continue to return to ranching areas. The EIS should discuss the purpose and effectiveness of hazing elk. The NPS would also continue to "perform testing for Johnne's disease and chronic wasting disease." This "testing" has included the NPS shooting 25-27 elk from October 2015 to March 2016, but no testing at all of Point Reyes cattle for these diseases, even though the NPS elk management plan states that Point Reyes elk contracted Johnne's disease from PRNS cattle. The EIS must explain why shooting elk while failing to test cattle, likely the largest vector of this disease at PRNS, in any way provides valid information about the disease. The EIS should also discuss the ranching practice of spreading waste manure from dairy ranches (likely infected with Johna's disease) on rangelands, and discuss the risk this poses of spreading the disease to elk and other native wildlife. Alternative B: Continued Ranching and Management of the Drakes Beach Tule Elk Herd

The Park Service has identified this alternative as the "proposed action," which suggests the agency may have already improperly identified it as a preferred alternative before environmental review and evaluation of impacts, which would foreclose a robust and fair consideration of alternatives.

This alternative would issue 20-year ranch lease permits to continue beef and dairy ranching operations on approximately 27,000 acres. Most federal lands grazing permits, such as on U.S. BLM and U.S. Forest Service lands, are limited to 10 year leases. Frequent grazing lease evaluations are needed for the NPS to be able to control and manage cattle herd numbers and AUMs, and to include and modify best management practices to respond to resource concerns such as drought, overgrazing, conflicts with wildlife, and public recreation needs. The EIS should discuss how the NPS would respond to changing resource concerns under 20-year permits.

Under this alternative, the NPS would "explore opportunities for ranch operational flexibility and diversification." Diversification is a euphemism for allowing ranchers to introduce new livestock animals into the park, such as chickens, goats and sheep, or to grow agricultural crops. This would inevitably lead to conflicts with the park's native wildlife, and could lead to killing of birds and native predators. No diversification should be allowed under any circumstances. The EIS must fully analyze and disclose which new agricultural uses are being considered, where they would occur, the potential for conflicts with native wildlife, and how the NPS and ranchers would address those conflicts.

This alternative would define reintroduced native tule elk as problem animals, to be "managed at a level compatible with authorized ranching operations" and to minimize impacts to ranch operations. Tule elk have been reintroduced to the park at great expense and effort. The EIS should explain how defining native elk as problem animals is consistent with maximum protection, restoration, and preservation of the natural environment.

Elk "management" of the Drakes Beach herd under this alternative could include "lethal removal methods" (shooting elk), translocating them outside of the park, or hazing. The EIS should discuss: the impacts on the population dynamics of the Drakes Beach herd if these methods are used; where translocated elk would be moved to and for what ecological benefit; and the impacts on park visitor experience from elk shooting and helicopters used for lethal control and translocation. The NPS could also apply these tactics to the Limantour free-range herd if they "affect ranchlands." The EIS must define what Limantour elk activities constitute affecting ranchlands, and what management triggers are proposed. No additional elk herds would be allowed to establish in the planning area. The EIS should disclose what management actions the NPS will take if new elk herds establish from existing herds.

The alternative proposes arbitrary minimum and maximum population sizes for the Drakes Beach elk herd of 100-160 elk. The NPS falsely claims this is based on "guidance" from the California Department of Fish and Wildlife's 2017 Draft Elk Conservation and Management Plan.¹ Yet this CDFW draft plan contains no such guidance on maximum or minimum population size. In fact, regarding minimum population viability the state's elk plan explicitly acknowledges

¹ California Department of Fish and Wildlife. 2017. Draft Elk Conservation and Management Plan. <https://nrm.dfg.ca.gov/FileHandler.ashx?DocumentID=151283> 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 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. The EIS should explain the science behind the arbitrary 100-160 Drakes Beach elk goal, and explain why a maximum population threshold is needed for the Drakes Beach elk herd. Discuss whether there is any ecological justification for limiting the size of this elk herd.

This alternative would establish approximately 900 acres of "resource protection buffers." The EIS should explain where and how large these "buffers" would be, what resources they would be protecting, and what ranching activities would be allowed in these buffer areas. The EIS should also explain the methodology for determining appropriate buffer areas. The alternative would provide a "programmatic review of best management practices." The EIS should explain what the purpose of a "programmatic review" is, how the NPS would move from review to implementation, what these best practices would be, what resources they are intended to protect, and how they would be enforced.

The alternative would implement a "conservation framework" on ranch lands allowing for different intensities of land use in different Land Management Units (LMUs) such as ranch core, pasture and range.

"Range" is defined as grazed or potentially grazed land that supports native vegetation, managed as a natural ecosystem. The EIS should disclose where native grassland exists in the planning area, and discuss all cattle

grazing impacts on native vegetation, negative and positive. Coastal native prairie is the most endangered natural ecosystem at Point Reyes, and has been converted to and kept in non-native grassland by cattle grazing. Authorized activities for range land would be limited to "regular grazing" with generally no pasture management or diversification activities. The EIS should define "regular grazing" and explain how regular cattle grazing would support or suppress native vegetation, and promote or inhibit a natural ecosystem. Range lands include documented sensitive resource areas, including rare plants, wetlands, riparian/stream/pond habitats, forested areas, critical habitat for threatened and endangered species, and archeological sites. The EIS should evaluate whether "regular grazing" is appropriate for each of these sensitive resource areas, and if so, at what stocking levels and duration. Describe the science that supports "regular grazing" as beneficial for native and rare plant communities. Describe the science that determines what levels and practices of cattle grazing are compatible with or conflict with maintaining native and rare plant communities.

Pasture areas would be primarily for the production of livestock, comprised of introduced or domesticated native forage species. Mowing, silage, "manure management" and some diversification activities would be allowed in pasture areas. The EIS should disclose what native wildlife and plant species occur in pasture areas. The EIS should evaluate the impacts of silage and mowing on nesting native birds and other wildlife. The EIS should evaluate the impacts of dumping liquid sewage from dairies on pasture areas ("manure management") on water quality and the potential for spread of livestock diseases to native wildlife. Ranch core would be the developed complex of buildings and structures on each individual ranch, with up to 2.5 additional acres of disturbed land immediately adjacent to the developed complex available for diversification activities such as row crops and other livestock. The EIS should identify what diversification activities would be allowed in pasture areas and ranch core areas, evaluate the impacts on and potential for conflicts with native wildlife, and discuss the NPS and rancher management strategies to address those conflicts.

Alternative C: Continued Ranching and Removal of the Drakes Beach Tule Elk Herd

This alternative appears to be similar to alternative B except that the Drakes Beach tule elk herd would be completely removed from PRNS using translocation outside of the park, if practicable, and agency-managed "lethal removal" methods. Questions to be addressed in the EIS are as above for alternative 8. The EIS should discuss whether removing the Drakes Beach elk herd is consistent with the maximum protection, restoration, and preservation of the natural environment of PRNS. The EIS should disclose where translocated elk would be moved to and for what ecological benefit. The EIS should disclose what will happen when Limantour herd elk move into the former Drakes Beach herd area.

Alternative D: Reduced Ranching and Management of the Drakes Beach Tule Elk Herd

Under this alternative, ranching operations would cease on approximately 7,500 acres in the planning area, with current ranching operations in the Point Reyes Peninsula Dairy Ranches Historic District and Olema Valley Dairy Ranches Historic District prioritized for remaining in ranching. The EIS should disclose how the 7,500 acre figure was chosen and why those particular 7,500 acres were identified for cessation of ranching. In reducing ranching operations, the NPS must be guided by its management policies to prevent impairment of natural resources, and eliminate the most environmentally harmful ranches and ranching activities. The EIS should analyze and prioritize ranch lands for closure based on: leaseholder history of non-compliance with lease conditions; ongoing problems with overgrazing; the presence of endangered, threatened or sensitive species; the presence of tule elk; conflicts with recreational access; significant water pollution; impact on wilderness areas, such as ranch lease areas that drain to Drakes Estero; and other environmental factors. The EIS should discuss the NPS proposal to close the ranches that drain to Drakes Estero, as part of the abandoned 2010 draft GMR update for PRNS.² The NPS evaluated an alternative which would rezone the Drakes Estero watershed to Natural Zone and the lands within it grazed by cattle would have been closed to ranching over time. The EIS should discuss the rationale for proposing to close these ranches, which the NPS described in 2010 as "the primary location for sensitive and unique resources" in PRNS.

Under alternative D, tule elk would be managed as in alternative B, but with population targets "commensurate with the level of ranching operations in this alternative" and formation of additional elk herds would be allowed. The EIS should explain what those population targets would be, the scientific rationale for the elk population targets, and how the elk population would be maintained or reduced.

Alternative E: No Dairy Ranching and Limited Management of Drakes Beach Elk Herd

Under this alternative, beef cattle ranching operations would continue but the 6 active dairies within Point Reyes would cease operations. Dairy operators would be eligible to convert dairy operations to beef cattle grazing over a period of 5 years. The acreage of PRNS and GGNRA with cattle grazing would remain the same, except solely grazed by beef cattle.

The EIS should discuss the rationale for allowing dairy leases to convert to beef cattle, rather than allowing the dairy leases to expire and converting and restoring former dairy lease lands for the purposes of protecting natural resources and providing public access. Discuss what the

2 National Park Service. 2010. Draft General Management Plan and Environmental Impact Statement, Point Reyes National Seashore, North District of Golden Gate National Recreation Area. impacts would be in terms of reduction or increase in AUMs, RDMs and forage from switching from dairy to beef cattle.

The NPS would take no action to limit elk population growth and limited action to manage the geographic extent of all free-range tule elk, and implement elk management where needed to support other resource protection and park goals. In the event that additional elk herds form, they would be allowed. The EIS should discuss situations where management of elk would be needed for "other resource protection and park goals" and what management options would be allowed.

The EIS should disclose the positive environmental impacts from closure of the dairy ranches, including: eliminating some of the most concentrated water pollution sources; removing many of the industrial sized agricultural facilities in the park; improved public access; and reduction of greenhouse gasses (the NPS states that the dairies are responsible for 78% of the park's carbon emissions).

This alternative should include a mechanism for retiring beef cattle grazing leases when current ranching families retire. The alternative should also include adjustments in cattle stocking levels and numbers to protect endangered species and wetlands habitats, prevent overgrazing and soil erosion, and ensure adequate and equitable forage for elk and other native wildlife. Beef cattle grazing leases should have enforceable conditions to protect natural resources, buffer areas, and sensitive habitat protections.

The alternative does not discuss diversification, but no agricultural activities of any kind other than beef cattle grazing should be allowed.

Alternative F: No Ranching and Expansion of Tule Elk In the Planning Area

Under this alternative, ranching in all areas of PRNS and the north district of GGNRA would cease, except for two locations with life-estates. Ranching operations with developed complexes would be phased out over a 5-year period and grazing-only operations would be phased out over a 1-year period. No agricultural activities would be permitted after the life estates expire. The EIS should discuss the environmental benefits of cessation of ranching, specifically regarding water quality, soils, wetlands, riparian vegetation, endangered species, and invasive plants.

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.

The NPS would take no action to limit elk population growth and limited action to manage the geographic extent of free-ranging tule elk, where needed to support other resource protection and park goals. The EIS should

evaluate the potential for rebuilding large 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.

"Prescriptive grazing" would be allowed in priority areas to address resource management goals, such as the maintenance of native and rare plant communities. The EIS should describe where and under what conditions such prescriptive grazing would occur, and describe the science that supports such grazing as beneficial for native and rare plant communities. Other Alternatives

The EIS is required under NEPA to consider and analyze a reasonable range of alternatives. The NPS indicated in the Federal Register notice on the GMP amendment/EIS scoping period that it will consider other alternatives that are suggested during the scoping period. Other conservation organizations have proposed 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 NPS should fully analyze these alternatives in the EIS. Even if these alternatives are not chosen as the proposed action, elements of the restoration and public access alternatives should inform and can be included in the preferred alternative.

Elements Common to All Alternatives

The NPS proposes increased public access to improve hiking, biking, and equestrian access in the planning area, including additional route designation and promotion. Trail opportunities would focus on loop routes, connectivity with adjacent public lands, and facilitation of north south connectivity across the landscape. Potential routes would primarily use abandoned or administrative roads (including ranching roads); new trail construction would be very limited. Most routes would be minimally maintained and would have a rural, backcountry character. The Center supports all of these concepts and applauds increased public access. The EIS should evaluate which public uses would be appropriate and evaluate specific locations where bicycles or horses may not be appropriate due to sensitive habitats.

The NPS proposes to expand day use facilities such as picnic areas and overnight accommodations in the planning area. These activities would be focused in previously disturbed areas, such as former ranch complexes. The Center supports these concepts. The EIS should evaluate potential negative impacts of picnic and camping areas - such as trash generation that increases populations of predators such as ravens and raccoons, and nighttime lighting - and locate facilities to avoid impacts and include measures to reduce visitor impacts.

The NPS proposes to expand interpretation of historic districts and ranching in the park. The NPS should also dramatically expand interpretation of the Coast Miwok people and of pre grazing natural ecosystems at Point Reyes.

Park Purposes

For each alternative, the EIS should discuss:

The ways and degree to which proposed ranching leases and ranching activities and operations are conflict with or support maximum protection, restoration, and preservation of the natural environment at PRNS and GGNRA

The ways and degree to which proposed ranching leases would conflict with public recreation and public benefit

The ways and degree to which proposed ranching leases and activities would promote or fail to conserve and provide for public enjoyment of the scenery, natural and historic objects, and wildlife The ways and degree to which proposed ranching leases would leave or fail to leave natural resources unimpaired for the enjoyment of future generations

The ways and degree to which proposed ranching leases and activities promote or conflict with recreational, educational, historical preservation, interpretation and scientific research opportunities

"Impairment" is defined as "harm to the integrity of park resources or values, including the opportunities that otherwise would be present for the enjoyment of those resources or values." The EIS should explain how the Park Service has determined which uses and activities within the ranching lease areas will not impair park values or resources; and what information was used to determine that ranching activities will not cause impairment or unacceptable impacts.

For activities and uses within the ranch lease areas which have been determined not to impair natural values, the EIS should disclose how such uses and activities fulfill the fundamental purpose of the National Park System, which is "to conserve park resources and values" and provide "for the enjoyment of park resources and values by the people of the United States."

The EIS should discuss the legislative history of PRNS and the GGNRA, and whether the Point Reyes Act supports continuing or ending ranching, and under what circumstances.

Elk Management

For each alternative, the EIS should discuss:

The carrying capacity of PRNS and GGNRA for tule elk and whether the proposed elk management and population levels would exceed that capacity

The scientific and ecological basis (not the economic basis to benefit ranchers) for each chosen elk management strategy, particularly for lethal methods, translocation, hazing, or sterilization

The rationale for managing lease areas for the exclusive use of private commercial cattle operations and excluding or removing native wildlife

The EIS should discuss the scientific basis for fencing free-ranging elk populations on public land, if fencing is to be used under any alternative. The EIS should evaluate why the fenced elk herd in the Tamales 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. The EIS should explain the consequences of fencing elk rather than allowing them to move freely to find water and food during drought years.

The EIS should assess ranch leaseholder claims about elk impacts to ranches, including: to what extent elk actually eat livestock forage; the potential damage from elk rubbing their antlers on agricultural equipment; and the possibility that elk have "stabbed cattle to death with their antlers."

The EIS should disclose the past annual expenditure of taxpayer dollars from Park Service employees moving and hazing elk from the ranch lease areas. The EIS should also evaluate predicted annual costs for each elk management strategy in each alternative. Endangered Species

The EIS should identify and map all habitats for wildlife and plants listed under the federal and state Endangered Species Acts as endangered, threatened or a species of special concern, as well as protective buffers needed to maintain ecological function for their suitable habitat.

The EIS should identify all designated critical habitat for federally listed species at PRNS and GGNRA and map where ranching leases overlap or runoff drains into critical habitat.

The EIS should identify where ranching and dairying activities overlap with habitat for state listed species.

The U.S. Fish and Wildlife Service and National Marine Fisheries Service evaluated ranching impacts on endangered and threatened species at PRNS in 2002 and 2004.³

For each alternative, the EIS should discuss:

Which proposed ranching and dairying activities and uses would conflict with or support providing maximum protection for sensitive species or their critical habitat

Which ranching and dairying activities and uses would be compatible with or conflict with protection and recovery of federally listed species

Any adverse or potentially significant impacts (under NEPA) from ranching activities on designated critical habitat for any federally listed species

What limitations or mitigation measures would be needed for ranching activities that conflict with protection of listed species

Where removal of important habitat areas from the designated pastoral zone would be needed to protect listed species

Where exclusionary fencing would be needed to protect sensitive habitats for listed species from livestock

Where reduced stocking levels of livestock in overgrazed areas would be needed to protect listed species

Where a prohibition on silage and mowing would be needed to protect sensitive species.

Where removal and control of invasive species would be needed to protect sensitive species

³ U.S. Fish and Wildlife Service. 2002. Formal Consultation on the Grazing Permit Renewal Program, Point Reyes National Seashore and the Golden Gate National Recreation Area, Marin County, California.

[https://www.nps.gov/pore/learn/management/upload/usfws biological opinion grazing permit renewal 020925.pdf](https://www.nps.gov/pore/learn/management/upload/usfws%20biological%20opinion%20grazing%20permit%20renewal%20020925.pdf)

National Marine Fisheries Service. 2004. The Continued Issuance of Grazing leases at Point Reyes National Seashore and the Golden Gate National Recreation Area in Marin County, California.

[https://www.nps.gov/pore/learn/management/upload/noaa biological opinion livestock grazing program 040405.pdf](https://www.nps.gov/pore/learn/management/upload/noaa%20biological%20opinion%20livestock%20grazing%20program%20040405.pdf)

Where proposed ranch lease areas overlap with stream, estuary, riparian or upland habitat for salmon or steelhead, the EIS should discuss:

Any potentially significant impacts (under NEPA) from ranching activities on Central California Coast coho salmon, California Coastal Chinook salmon, steelhead trout or salmonid habitat

Any continuing or unresolved ranching impacts on salmonid habitat, particularly in Olema Creek and tributaries, Lagunitas Creek and tributaries, and tributaries of Drakes Estero

What salmonid protection measures from the 2004 NMFS Biological Opinion for salmonids have or have not yet been implemented

Which stream reaches with livestock grazing do not have 15 to 30 meter riparian buffers

The results of salmonid habitat and riparian monitoring, as required by the 2004 NMFS Biological Opinion for salmonids

Where and how often suspended sediment, nutrient or fecal coliform thresholds have been exceeded in salmonid streams, whether ongoing problems have been identified, and what remedies have been implemented

Where and how often water temperature thresholds have been exceeded in salmonid streams, whether ongoing grazing problems have been identified, and what remedies have been implemented

Whether excessive sedimentation issues and impacts to channel form and morphology have been identified in salmonid streams from grazing and what remedies have been implemented

Whether damage, loss or inhibition of growth of riparian vegetation has been identified in salmonid streams; and whether the 2004 NMFS Biological Opinion success criteria for riparian vegetation has been met

Whether erosion of streambanks or loss of habitat complexity has been identified in salmonid streams from grazing and what remedies have been implemented

Results of monitoring for suspended sediment, fecal coliform, channel bed conditions, water temperatures, and riparian vegetation conditions in salmonid streams, as required by the 2004 NMFS Biological Opinion

Whether and how NPS has ensured and will ensure that aquatic and riparian habitat conditions in salmonid streams continue to improve and remain in good condition

California Red-legged Frog

Where proposed ranch lease areas overlap with potential habitat for the California red-legged frog, the EIS should discuss: Any adverse or potentially significant impacts (under NEPA) from ranching activities on the red-legged frog, or frog habitat

Livestock grazing impacts on red-legged frog habitat in terms of riparian and wetland habitat alteration, water pollution, damage to breeding sites, and trampling of estivation habitat

Measures the NPS has taken since 2002 to protect seasonal upland habitats and travel corridors for CRLF from impacts by cattle

Western Snowy Plover

Where proposed ranch lease areas in PRNS overlap with potential habitat for the western snowy plover, the EIS should discuss:

Any adverse or potentially significant impacts (under NEPA) from ranching activities on western snowy plovers or plover habitat

Whether any cattle have had access to snowy plover nesting areas since 2002, including trespass cattle

The EIS should discuss: changes in populations of common ravens at PRNS since the 2002 USFWS Biological Opinion; the role dairies and ranches have in elevating raven populations; what is known about raven predation on snowy plovers at PRNS since the 2002 Biological Opinion; what measures have been taken to reduce feeding opportunities for common ravens at ranches and dairies; whether the NPS has allowed any increase in silage production since 2002; and whether the NPS has returned any silage fields to permanent pasture since 2002.

Myrtle's Silverspot Butterfly

Where proposed ranch lease areas overlap with potential habitat for the Myrtle's silverspot butterfly, the EIS should discuss:

Any adverse or potentially significant impacts (under NEPA) from ranching activities on the Myrtle's silverspot butterfly or butterfly habitat

Any evidence of livestock trampling host plants or butterfly larvae

NPS mapping and monitoring of Myrtle's silverspot butterfly larval host and nectar plants, and responses of these plants to different grazing regimes

Any change in status of Myrtle's silverspot butterfly populations and host plants at PRNS since the 2002 Biological Opinion

Measures NPS has taken to remediate adverse impacts to Myrtle's silverspot butterfly and host plants from cattle grazing Listed Plants

Where proposed ranch lease areas overlap with potential habitat for any listed plant species, including Sonoma alopecurus, Sonoma spineflower, Marin dwarf flax, Tiburon paintbrush, Beach layia, and Tidestrom's lupine, the EIS should discuss:

Any adverse or potentially significant impacts (under NEPA) from ranching activities

The scientific evidence that excessive livestock grazing adversely affects Sonoma alopecurus; and the trends of Sonoma alopecurus populations subject to livestock grazing

The scientific evidence that livestock grazing negatively affects the Tiburon paintbrush; and the trends of Tiburon paintbrush populations subject to livestock grazing

The scientific evidence that livestock grazing may negatively affect the Sonoma spineflower; and the trends of Sonoma spineflower populations subject to livestock grazing

The scientific evidence that livestock grazing is a major threat to Tidestrom's lupine, due to loss of dune habitat; and the trends of Tidestrom's lupine populations subject to livestock grazing

NPS mapping and monitoring of these listed plants; and responses of these plants to different grazing regimes

Any change in the status of populations of these listed plants at PRNS since the 2002 Biological Opinion

Any measures taken to remediate adverse impacts from grazing to any of these listed plants, including: seasonal restrictions on grazing; exclusion fencing; and establishment and plantings

Water Quality Impacts

For each alternative, the EIS should discuss:

The condition of fresh water resources within proposed ranching areas, and any impairment due to grazing and ranching activities

Any impairment to water quality in creeks from livestock grazing and dairies

Any impairment to water quality in wetlands and other freshwater habitats within PRNS and GGNRA, including Drakes Estero and Abbotts Lagoon, from livestock grazing and dairies

Any impairment to water quality in Tomales Bay due to livestock grazing and dairies at PRNS and GGNRA

Fecal coliform, ammonia and bacteria inputs to creeks and freshwater habitats from livestock grazing and dairies, and the impacts on aquatic wildlife and ecosystems Nutrient inputs to creeks and freshwater habitats from livestock grazing and dairies, and the impacts on aquatic wildlife and ecosystems

Sediment inputs to creeks and freshwater habitats from livestock grazing and dairies, and the impacts on aquatic wildlife and ecosystems

How dairies and livestock grazing leases control or fail to control livestock waste discharge and runoff

What needs to be done to remediate the impairment of water quality by livestock grazing and provide aquatic resources with maximum protection, restoration and preservation

Any NPS plans to restore creek banks and riparian zones negatively impacted by former or current ranch operations

What scientifically based buffer zones and setbacks are needed for grazing and ranching operations near streams, riparian areas and wetlands to ensure their ecological function

Any uses of pesticides or other toxic chemicals at ranches and dairies The ecological impacts from dams and stock ponds on ranchlands How the NPS will ensure that ranching leases comply with water quality standards as required by the Federal Facilities provision of the Clean Water Act

How the NPS will determine whether GMP alternatives comply with the Coastal Zone Management Act

A NPS 2013 Coastal Watershed Assessment for Point Reyes National Seashore⁴ documented cattle ranching pollution of water resources in the park and identified bacterial and nutrient pollution from dairies and ranches as a principal threat to water quality. Of the 6 dairies at PRNS, the NPS found "severe pollution" at 5 of them. 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. For each alternative, the EIS should discuss how the NPS will address such water pollution from dairies and ranches.

Water-quality monitoring data from 2012-2017 submitted by NPS to the Water Quality Portal (compiled by the U.S. Geological Survey, Environmental Protection Agency and National Water Quality Monitoring Council) show that some waters of PRNS rank in the top 10 percent of U.S. locations most contaminated by feces, indicated by E. coli bacteria. High fecal coliform readings reported by NPS came from wetlands and creeks draining ranches in the Kehoe Beach area of PRNS. Eight locations in the Olema Valley that receive runoff from cattle ranches within the GGNRA also stood out for high fecal bacteria levels. The Center for Biological Diversity mapped the highest E. coli test result for every available water testing location in the country submitted

⁴ National Park Service. 2013. Coastal Watershed Assessment for Golden Gate National Recreation Area and Point Reyes National Seashore. <https://www.nps.gov/goga/learn/management/upload/GGNRA-PAGES-140655-141543.pdf> to the Water Quality Portal, from October 2012 to October 2017.⁵ PRNS stood out as one of the 10 most feces-contaminated locations monitored in California since 2012; and the state's highest reported E. coli level was on a Point Reyes cattle ranch.

The EIS should discuss water quality issues at PRNS and GGNRA due to cattle waste and disclose the potential environmental and human health impacts.

The San Francisco Bay Regional Water Quality Control Board commented on the NPS' previously proposed Ranch Comprehensive Management Plan and expressed concerns whether PRNS ranching operations operate in compliance with current federal and state regulations, including Waste Discharge Requirements and/or waivers of WDRs issued by the Water Board. The Board stated "[w]e would like to see specific details developed in the Final NEPA document that address rangeland assessment and facility inspections, compliance monitoring, record-keeping, implementation of management practices, reporting, and, if necessary, enforcement. The Final NEPA document should also discuss NPS enforcement of State and federal regulations."

The EIS should discuss how each alternative will address these issues raised by the Water Board and how ranching operations will operate in compliance with current federal and state regulations. The EIS should discuss in detail how the NPS will address specific issues raised by the Water Board, including: water supply development; impacts to riparian zones; performance standards for fencing; maintenance of dairy and ranch land infrastructure; farmstead storm water BMPs; and a water quality monitoring program.

The Water Board requested evaluation of "bacteriological water quality impacts associated with cattle being grazed near, or allowed direct access to creeks where they sometimes linger." How will each alternative address this issue?

The Water Board noted that the NPS has prioritized and completed water pollution remediation actions in some tributaries, but cattle still gain access to several creeks not identified as "top priority" tributaries. The Water Board stated that it isn't clear how the NPS determined what constitutes a "top priority" and if it has evaluated the water quality impacts of having cattle in "lower priority" tributaries. The EIS should answer these questions and discuss how each alternative would address these issues.

Other Wildlife and Habitat Impacts

The EIS should discuss:

The science on livestock grazing impacts to native vegetation and to riparian areas at PRNS and GGNRA

The amount of water use needed for beef and dairy cattle production at PRNS and GGNRA; and quantify how that impacts water available for native wildlife and plants

5 Center for Biological Diversity. 2017. Wasted Water: The Crappiest Places in America - Literally. <https://therevelator.org/wasted-water-crappiest-places/> See also CBD. 2017. Cattle Waste Puts California's Point Reyes on 'Crappiest Places in America' List. https://www.biologicaldiversity.org/news/press_releases/2017/point_reyes-11-21-2017.php Whether pasture dogs are allowed on PRNS and GGNRA grazing lease areas and the potential impacts on wildlife

Any rancher depredation of wildlife or requests for wildlife control at PRNS and GGNRA

Whether the NPS pays or allows any other agency or entity to manage or depreciate wildlife on PRNS and GGNRA lands

Forage

For each alternative, the EIS should discuss:

How the NPS will determine how much forage is available for livestock on each ranch lease, and identify the forage levels on each ranch lease

The forage needs of tule elk, deer, and other native grazing and browsing animals in lease areas

How the NPS determines what percentage of available forage should go to livestock rather than to native wildlife

• How the NPS determines whether cattle grazing leases and silage operations will leave adequate forage for native grazing and browsing animals during dry and drought years

How ROM levels are established for lease areas and whether they are adequately protective of native ecosystems and wildlife

Past NPS analysis of PRNS and GGNRA grazing (ROM or Residual Dry Matter monitoring); and any overgrazing which has been documented

Whether the NPS has failed to enforce existing ROM standards for grazing leases; and how it will enforce them in the future to prevent overgrazing and erosion

How the NPS has handled documentation of overstocking of cattle and other violations of lease conditions

Whether current and proposed livestock stocking levels are maximally protective of creeks, wetlands, wildlife habitat and water quality

The NPS uses outdated (1990) Range Monitoring and Guidelines to determine appropriate cattle stocking levels for PRNS. The NPS overestimates the grassland productivity of ranch lease areas by using outdated soil surveys. The NPS underestimates the weight of cattle, which results in further overstocking. The NPS assumes that 100% of the available forage (above the required minimum ROM) is allocated to cattle and 0% to wildlife⁶. This results in chronic overgrazing by cattle that is visible on many of the PRNS ranches, and was documented in a 2015 rangeland condition report by U.C. Berkeley for PRNS⁷. The 2015 report showed that 33% of the grazing transects studied were below the minimum 1,200 ROM for the years 2012-2014.

⁶ See Save Our Seashore. 2014. Range Conditions Appendix. ⁷ Bartolome, J., M. Hammond, P. Hopkinson, and F. Ratcliff. 2015. 1987-2014 Residual Dry Matter Analysis Report and Updated Rangeland Monitoring Guidelines for Livestock Grazed Grasslands within PRNS and GGNRA. Range

The EIS should disclose whether soil surveys, grassland productivity, calculation of AUMs, and forage availability are calculated using the best available science. As part of the EIS, the NPS should adjust and update the park's soil surveys, definition of AUMs (to accurately reflect the current weights of dairy and beef cattle and their actual forage consumption), and assumptions about ratio of cattle and wildlife use of available forage.

The EIS should discuss the impact of mowing for silage on breeding birds, per the 2015 Point Blue report⁸ documenting mortality and declines in grassland bird abundance and nesting at PRNS due to silage mowing.

Best Management Practices

The EIS should disclose exactly what best management practices the NPS will require through grazing leases; how the NPS determines what are BMPs for grazing leases and whether they are adequate to protect natural resources; how much BMPs are monitored; how BMPs are enforced, with examples; and the effectiveness of BMPs in protecting natural resources.

Invasive Species

The EIS should discuss the extent to which exotic and invasive plants exist in the ranch lease areas; which invasive plants were brought to PRNS and GGNRA by cattle; where invasive plants are spread or maintained by cattle grazing and silage production; how cattle grazing, importation of hay, and other ranching activities promote the

spread of invasive plants; and whether and under what conditions cattle grazing can help control or spread invasive plants.

For each alternative, the EIS should discuss how NPS intends to control invasive plants in the lease areas; identify where and under what circumstances cattle grazing would be used for invasive plant control; and whether the proposed grazing regimes are reflective of actual grazing practices in lease areas and are enforceable by NPS.

The EIS should discuss elevated populations of invasive starlings and native cowbirds due to ranching and dairy operations, and the impacts on nesting of native birds. It should also discuss elevated populations of ravens due to ranching and dairy operations and impacts on native wildlife, particularly snowy plovers.

Disease Transmission

The EIS should discuss:

The presence and extent of Brucellosis in wildlife and livestock at PRNS and GGNRA, and the most likely routes of transmission

Ecology Lab, Department of Environmental Science, Policy, and Management, University of California, Berkeley, California. https://www.nps.gov/pore/getinvolved/upload/planning_ranch_cmp_background_report_ucberkeley_residual_dry_mat_ter_analysis_150830.pdf 8 DiGaudio, R.T., D.L. Humple, and T. Gardali. 2015. Estimating Impact of Mowing in the Silage Fields of Point Reyes National Seashore on Breeding Birds. Final Report to the National Park Service. Point Blue Conservation Science, Petaluma, California. https://www.nps.gov/pore/getinvolved/upload/planningranch_cmp_background_report_pointblue_impact_of_mowing_on_breeding_birds_150831.pdf

The relative potential for Brucellosis to be transmitted from to livestock to wildlife; and from wildlife to livestock

The presence and extent of Johne's Disease in wildlife and livestock at PRNS and GGNRA, and the most likely routes of transmission

The relative potential for Johne's Disease to be transmitted from to livestock to elk and other wildlife; and from wildlife to livestock

Whether these diseases existed in the park before the reintroduction of elk

The historical presence of these diseases in PRNS and GGNRA livestock and the conditions of dairying and ranching activities which can act as a vector for these diseases

What role the ranching practice of spreading cattle manure on grasslands likely has in transmitting these diseases to native wildlife

The NPS plan for monitoring livestock for presence of Brucellosis, Johne's Disease, and other livestock diseases which can harm native wildlife

The NPS remediation plan for eliminating these diseases from PRNS and GGNRA livestock

Fencing

The EIS should discuss:

Where exclusion fencing has been installed to keep livestock out of creeks, riparian areas, wetlands, and freshwater aquatic habitats

The condition, effectiveness, and monitoring of this exclusion fencing

Where such exclusion fencing does not exist and where livestock have access to creeks, riparian areas, wetlands, and freshwater aquatic habitats

Issues with lack of maintenance and repair of cattle exclusion fencing, which allows trespass cattle into sensitive areas

Which fences in PRNS and GGNRA are not wildlife friendly, and the potential impacts on elk and other native wildlife; and any documented injuries to and deaths of native wildlife from fencing

Fencing that is unneeded or no longer in use (abandoned) for ranching and provide a timeline for derelict fence removal to improve movement of wildlife

Roads

The EIS should discuss: The science showing that ranch roads contribute to erosion, sedimentation of streams, and pollution

The extent to which PRNS and GGNRA ranch roads fragment habitat or affect wildlife movement

The impact that ranching and dairying trucks have on roads, and the extent to which additional repairs are needed on main roads due to impacts from heavy ranching vehicles and equipment

The EIS should identify which ranch roads are no longer needed for ranching; and prioritize their removal to reduce erosion, pollution and sediment.

Greenhouse Gasses

The EIS should discuss how ranching and dairying activities subvert PRNS goals in the Climate Friendly Parks campaign. A 2005 PRNS analysis found that 78% of the park's carbon emissions are from dairy wastes (or manure) in the form of methane gas. The EIS should identify what portion of the remaining park emissions from transportation sources are from ranching lease activities. The EIS should update the park's outdated GHG emissions inventory conducted in 2005. It should discuss the current estimate of livestock and dairy ranching contribution to PRNS greenhouse gas emissions and what percentage that represents (all CO₂ contributions, including methane emissions from dairies, contributions from milk, hay and manure trucks, farm equipment, etc.).

For any alternative which allows continued dairy ranching, the EIS should disclose whether the NPS will require methane digesters.

So-called rangeland carbon sequestration has been proposed for some ranch lease areas at PRNS. The EIS should discuss whether any peer-reviewed science supports the concept of carbon sequestration through livestock grazing, and what can realistically be sequestered versus the CO₂ footprint of ranching operations. The NPS should not allow compost use on rangelands before any CO₂ offset impacts are proven. The NPS should promote native grassland restoration to sequester carbon. '

Public Access/Recreation

For each alternative, the EIS should discuss:

Where dairying operations and facilities and grazing lease fencing would conflict with public access

Whether and how ranching would impede recreational enjoyment due to factors such as cattle waste, unpleasant odors and sights, unsightly industrial agriculture facilities, silage mowing, reduced wildlife sightings, trail erosion, and a lack of hiking and biking opportunities

Detailed alternative public uses for ranching lease lands, including wildlife habitat, wildlife viewing and photography, research, recreation, campgrounds, educational facilities, etc. The EIS should disclose any past reports and complaints of ranchers closing public lands to recreationists, and fences impeding hiking and enjoyment of PRNS and GGNRA by the public

Diversification

For any alternative which includes agricultural diversification, such as new kinds of livestock, small animals, row crops, dairy processing, on-site slaughtering, hotel operations, and other proposed commercial activities, the EIS must fully analyze any potentially damaging environmental impacts.

The EIS should discuss:

Potential impacts of row crops, including: reduced habitat for wildlife; creating conflicts with native birds and animals that may feed on them; requiring additional fencing; and use of water

Potential for creating conflicts with native predators if ranches are allowed to add chickens, turkeys, ducks, geese, sheep, goats, rabbits or similar small animals

What new structures and infrastructure would be required for different diversification schemes

Whether allowing any additional private economic enterprises or activities would conflict with the purposes of PRNS

What diversification operations have already been approved by NPS, or are being illegally conducted in lease areas, including farm stay operations, chickens, and any agricultural activities other than cattle grazing

How various diversification uses would limit or prevent public access

Residential Facilities and Impacts

The EIS should disclose:

All commercial and residential structures in the grazing lease areas, including primary residences, employee housing, barns, etc.; and whether the lease tenant or the NPS pays for them and how much

Under what laws and regulations the NPS authorizes year-round residential facilities for ranchers and their employees in addition to grazing

The environmental impacts and public costs of infrastructure and utilities that accompany the ranching, including septic tanks, wells, waste disposal, parking lots, electricity, fences, water developments, roads, elk management, environmental mitigation, etc.

What residential facility upkeep costs the NPS is responsible for in ranching lease areas, such as roofs, plumbing, painting, renovations, septic tank pumping, etc. How many people live at all the ranches and how many annual visitors are there to the ranches houses

Whether off-road vehicle use is allowed on ranch lease areas

Whether ranches store gasoline or other hazardous materials; and whether there are spills

Lease Enforcement Problems

The EIS should discuss:

Any past concerns or evidence of grazing lease violations, such as illegal subleasing, overstocking, shooting or poaching wildlife, or blocking public access

Dumping of trash, including barbed wire; improper disposal of livestock carcasses in the lease areas; and the impacts on wildlife

How the NPS ensures compliance with lease conditions

Whether the NPS has ever taken any enforcement action for lease violations

Economics

The EIS should discuss:

The economic benefits to the local economy from park visitors and wildlife viewing

The contrast in income from recreation versus income from park grazing leases, per the 2006 NPS Economic Impacts Study⁹

The full economic costs of grazing leases, including: below-market grazing rates; subsidized housing; NPS funded improvements to ranches; NPS funded mitigation for ranch environmental impacts; costs of monitoring, compliance and enforcement of lease conditions; damage to roads and other infrastructure; etc.

How the NPS determines fair market value of grazing and housing leases; and whether this is consistent with federal policy and with other federal lands

Grazing subsidies, and the PRNS and GGNRA grazing lease and housing rental rates compared to equivalent grazing land rates and rents outside the park

The annual monetary loss from providing below-market leases for grazing and rent

The annual costs of ranching infrastructure improvements, such as fencing, road maintenance, erosion control, habitat restoration, monitoring, compliance, etc.

⁹ National Park Service. 2006. Economic Impacts Study, Point Reyes National Seashore. Final Report. https://www.nps.gov/pore/learn/management/upload/planning_economicimpacts_final_061211.pdf How much staff time NPS spends on monitoring, compliance, working with ranchers on BMPs, and permitting in the lease areas, and the estimated annual costs

Aesthetics

The EIS should analyze and disclose the aesthetic impacts to park visitors from ranching and dairying operations under each alternative, including: creating an industrialized environment; ranch vehicles; trash; fencing; damaged roads; lighting; odors from cattle manure; etc.

Transparency

The EIS should disclose how many meetings the NPS has had with ranchers, agricultural interests, and pro-ranching advocates in developing the GMP amendment. How many meetings with agricultural interests since the July 2017 settlement was announced? How many meetings with agricultural interests since 2014 when the Ranch Comprehensive Management Plan was launched?

Disclose how many meetings the NPS has had with ranching reform advocates, other users of the park, or wildlife interests in the same time periods, in developing the GMP amendment.

Public Support for Tule Elk and Natural Resources

We are attaching a letter from 118 conservation and community organizations from 30 states, advocating that the amendment to the General Management Plan should prioritize protecting native wildlife and the natural values of Point Reyes National Seashore. These organizations support allowing free-roaming tule elk herds to remain at PRNS, and object to any fencing, removal, hazing, sterilization, or killing of elk in the park. These organizations object to allowing agricultural diversification. The organizations advocate that any cattle ranching operations in the park must be managed to accommodate elk and other native wildlife, and in a way that does not damage ecosystems or negatively impact wildlife habitat, water quality, native vegetation, public recreation or the aesthetic beauty of the park.

Sincerely, Jeff Miller Conservation Advocate Center for Biological Diversity

22 Point Reyes GMP Amendment Superintendent Point Reyes National Seashore 1 Bear Valley Road Point Reyes Station, CA 94956

Re: Point Reyes General Management Plan Amendment

PROTECT POINT REYES ELK AND WILDLIFE

Our 118 organizations from 30 states strongly support the management of Point Reyes National Seashore to protect its outstanding natural values and to provide for public recreation, benefit, and inspiration.

We support allowing free-roaming tule elk herds to remain at Point Reyes National Seashore, and object to any fencing, removal, hazing, sterilization, or killing of elk in the park. The General Management Plan amendment for Point Reyes National Seashore should prioritize restoration of the park's elk herds to historic numbers. There is immense public value to the native tule elk at Point Reyes, the only tule elk herds within the National Park system. Elk are an ecologically important part of the landscape of Point Reyes and their recovery is a success story for restoring native ecosystems, consistent with the mission of the National Park Service.

Commercial leases or activities in the park should not conflict or interfere with protection of natural resources or public uses. Commercial lease holders on our public lands in the park should not dictate wildlife removal or exclusion policies that harm park wildlife. Any cattle ranching operations in the park must be managed to accommodate elk and other native wildlife, and should not harm habitat for endangered species. Any ongoing cattle grazing leases must be managed in a way that does not damage ecosystems or negatively impact wildlife habitat, water quality, native vegetation, public recreation or the aesthetic beauty of the park.

We object to any conversion of Point Reyes National Seashore lands to row crops, which would degrade wildlife habitat and water quality in the park and prevent public access. We also oppose expansion of commercial livestock farming to introduce sheep, goats, pigs, turkeys or chickens, which would create conflicts with predators and pressure to kill bobcats, coyotes and foxes.

The National Park Service is charged with managing Point Reyes National Seashore in a manner which provides maximum protection, restoration, and preservation of the natural environment. The Park Service's amendment to the General Management Plan should prioritize protecting the native wildlife and natural values of Point Reyes National Seashore.

Sincerely,

Center for Biological Diversity Randi Spivak, Public Lands Program Director Washington, DC

Resource Renewal Institute Deborah Moskowitz, President Mill Valley, CA Western Watersheds Project Erik Molvar, Executive Director Laramie, WY Marin/Sonoma Organizations: Animal Legal Defense Fund Stephen Wells, Executive Director Cotati, CA

Defense of Place Nancy Graalman, Director Mill Valley, CA

Fund for Wild Nature Marnie Gaede, President Sebastopol, CA

Golden West Women Flyfishers Cindy Charles, Conservation Chairperson San Rafael, CA

In Defense of Animals Elliot M. Katz, Founder and President Emeritus San Rafael, CA

Madrone Audubon Society Susan Kirks, President Santa Rosa, CA

Oceanic Preservation Society Louie Psihoyos, Executive Director Greenbrae, CA

Paula Lane Action Network Susan Kirks, Board Member Petaluma, CA

Sonoma County Wildlife Rescue Desiree McGunagle, Volunteer & Community Support Coordinator Petaluma, CA

Turtle Island Restoration Network Todd Steiner, Executive Director Olema, CA

WildCare Vaughn Maurice, Executive Director San Rafael, CA Other Organizations:

350 New Orleans Renate Heurich, Vice President New Orleans, LA

Advocates for Snake Preservation Melissa Amarello, Co-founder Tucson, AZ

Alameda Creek Alliance Jeff Miller, Director Fremont, CA

AII-Creatures.org Veda Stram, Administrator Athens, NY

Animals Are Sentient Beings Sarah Stewart, President Cambridge, MA

Arkansas Audubon Society Maureen McClung, Conservation Chair Little Rock, AR

Basin and Range Watch Laura Cunningham, Executive Director Cima, CA

Blue Sphere Foundation Candace Crespi, Campaigns Manager New York, NY

California Water Impact Network Carolee Krieger, President and Executive Director Santa Barbara, CA

Cascadia Wildlands Josh Laughlin, Executive Director Eugene, OR

Citizens Coalition for a Safe Community Paul Ferrazzi, Executive Director Culver City, CA

Citizens Committee to Complete the Refuge Carin High, Co-chair Palo Alto, CA Ciudadanos Del Karso Abel Vale, President San Juan, PR

Coastal Conservation League Dana Beach, Executive Director Charleston, SC

Committee for the Preservation of the Tule Elk Bruce Keegan, Secretary San Francisco, CA

Conservation Congress Denise Boggs, Director Chico, CA

Cool Planet Paul Thompson, Co-founder and Co-Director Edina, MN

Cumberland Chapter of Sierra Club Tom Morris, Chapter Chair Lexington, KY

Eastern Coyote/Coywolf Research Jonathan Way, Founder Osterville, MA

Ecologistics Stacey Hunt, Chief Executive Officer San Luis Obispo, CA

The Ecology Party of Florida Cara Campbell, Chair Fort Lauderdale, FL

Endangered Habitats League Dan Silver, Executive Director Los Angeles, CA

Endangered Species Coalition Leda Huta, Executive Director Washington, DC

Environmental Protection Information Center (EPIC) Tom Wheeler, Executive Director Arcata, CA

Fairmont Minnesota Peace Group Judi Poulson, Chair Fairmont, MN

Farmworker Association of Florida Jeannie Economos Apopka, FL

Federation of Western Outdoor Clubs (42 Member Clubs and Organizations) George Milne, President Oak Grove, OR

Food & Water Watch Wenonah Hauter, Executive Director Washington, DC

Friends of Animals Wildlife Law Program Michael Harris, Director Denver, CO

Friends of Bell Smith Springs Sam Steams, Public Education Coordinator Stonefort, IL

Friends of the Black-tail Prairie Dog David Orr, President Austin, TX

Friends of Del Norte Joe Gillespie, President Crescent City, CA

Friends of the Earth - US Gary Graham Hughes, Senior California Advocacy Campaigner Berkeley, CA

Friends of the Santa Clara River Ron Bottorff, Chairman Newbury Park, CA

GARDEN (Growing Alternative Resource Development and Enterprise Network) Susan Silverman, Executive Director Tucson, AZ

Global Justice Ecology Project Ruddy Turnstone Buffalo, NY

Golden Gate Audubon Society Cindy Margulis, Executive Director Berkeley, CA Great Salt Lake Audubon Heather Dove, President Salt Lake City, UT

Green Peace Corps Tom Thirion Albuquerque, NM

Hilton Pond Center for Piedmont Natural History Bill Hilton Jr., Executive Director York, SC

Howling For Wolves Maureen Hackett, President Hopkins, MN

Idle No More SF Bay Pennie Opal Plant, Co-founder San Francisco, CA

Independent Environmental Conservation & Activism Network Leslie Perrigo, Executive Director Muncie, IN
inNative David Jaber, Principal Berkeley, CA

Interfaith Council for the Protection of Animals and Nature Lewis Regenstein, President Atlanta, GA

International Society for the Preservation of the Tropical Rainforest Arnold Newman, Executive Director Los Angeles, CA

Kettle Range Conservation Group Timothy Coleman Republic, WA

Kickapoo Peace Circle Marcia Halligan Viroqua, WI

Klamath Forest Alliance Kimberly Baker, Executive Director Orleans, CA

The Lands Council Mike Petersen, Executive Director Spokane, WA

Long Branch Environmental Education Center Paul Gallimore, Director Leicester, NC

Louisiana Bucket Brigade Anne Rolfes, Founding Director New Orleans, LA

Massachusetts Forest Watch Chris Matera Springfield, MA

Minnesota River Valley Audubon Chapter Matthew Schaut, President Bloomington, MN

Mission Peak Fly Anglers Steve Schramm, Conservation Chair Fremont, CA

Moloka'i Community Service Council Karen Holt Kaunakakai, HI

Monterey Coastkeeper Steve Shimek, Executive Director and Founder Monterey, CA

Mount Diablo Audubon Society Nancy Wenninger, Conservation Chair Walnut Creek, CA

National Whistleblower Center Stephen M. Kohn, Executive Director Washington, DC

National Wolfwatcher Coalition Nancy Warren, Executive Director Duluth, MN

Nature Abounds Melinda Hughes, President DuBois, PA

North County Watch Susan Harvey, President Templeton, CA Northcoast Environmental Center Larry Glass,
Executive Director Arcata, CA

Northeast Oregon Ecosystems Wally Sykes, Co-founder Joseph, OR

Northlake Unitarian Universalist Church Rev. Jim VanderWeele Kirkland, WA

Northwest Animal Rights Network Rachel Bjork, Board Member Seattle, WA

Northwest Arkansas Audubon Society Carol Joan Patterson, Vice-President and Conservation Chair Fayetteville,
AR

Ocean Outfall Group Joey Racano, Director Los Osos, CA

Ohlone Audubon Society William Hoppes, President Hayward, CA

The Otter Project Steve Shimek, Executive Director Monterey, CA

Pacific Environment Dominique Zuber, Advancement Director San Francisco, CA

Pasadena Audubon Society Laura Garrett, President Pasadena, CA

Pelican Media Judy Irving, Executive Director San Francisco, CA

Prairie Rivers Network Carol Hays, Executive Director Champaign, IL

Predator Defense Brooks Fahy, Executive Director Eugene, OR

Preserve Lamorinda Open Space Suzanne Jones Moraga, CA

Public Lands Project Mike Hudak, Director Binghamton, NY

Rainier Audubon Society Dan Streiffert, Conservation Chair Auburn, WA

Raptors Are The Solution Lisa Owens Viani, Director Berkeley, CA

Regional Parks Association Amelia Wilson, President Berkeley, CA

RESTORE: The North Woods Michael Kellett, Executive Director Hallowell, ME

San Luis Obispo Coastkeeper Gordon Hensley San Luis Obispo, CA

Santa Cruz Climate Action Network Pauline Seales, Organizer Santa Cruz, CA

Save Our Shores Katherine O'Dea, Executive Director Santa Cruz, CA

Save Our Sky Blue Waters Lori Andresen, President Duluth MN

Save Richardson Grove Coalition Barbara Kennedy, Campaign Coordinator Weott, CA

Save The Frogs! Kerry Kriger, Executive Director Laguna Beach, CA Seven Generations Ahead Gary Cuneen,
Executive Director Oak Park, IL

Solar Wind Works Chris Worcester Truckee, CA

Spottswode Estate Vineyard & Winery Beth Novak Milliken, President St. Helena, CA

Supporters for Del Norte Roosevelt Elk Phoebe Lenhart Crescent City, CA

Sustainability Leaders Network Edie Farwell, Executive Director Norwich, vr Topanga Peace Alliance Julie Levine, Co-Director Topanga, CA

Wholly H20 Elizabeth Dougherty, Director Oakland, CA

Wild Horse Education Laura Leigh, President Reno, NV

Wild Nature Institute Derek Lee, Principal Scientist Concord, NH

Wild and Scenic Rivers Alyssa Babin, Executive Director Brookings, OR

Wildcoast Zachary Plopper, Conservation Director Imperial Beach, CA

WildEarth Guardians Marla Fox, Rewilding Attorney Portland, OR

Wilderness Watch George Nickas, Executive Director Missoula, MT

The Wildlands Conservancy Dan York, Vice President Oak Glen, CA

Wildlife Rehabilitation Center of Northern Utah Buz Marthaler, Chairman and Co-Founder Ogden, UT

The Wildlife Trust Edward Loosli, President Walnut Creek, CA

Yellowbilled Tours Richard Cimino Larkspur, CA RANGE CONDITIONS APPENDIX

We discussed these range conditions in general with the ranchers but have yet presented this draft or initialed detailed discussions on it. Thus this Proposal primarily represents our own views as informed by discussions with the ranchers, so we do not expect ranchers to agree to every section in our Proposal. Meanwhile, the RCMP process continues, so Save Our Seashore wanted to provide PRNS with a status report regarding our views on range conditions. We would be happy to meet with you to discuss this information and our views in further detail.

DRAFF PASTURE MANAGEMENT PROPOSAL: The RCMP must ensure that any future permitting system demonstrates sustainable ranching practices. An important element of demonstrating said sustainability is ensuring that lands are not over-grazed. At least some portions of PRNS ranches appeared to be over-grazed last fall, however, we agree with the ranchers we have consulted that this perception is likely driven by the recent drought conditions. As the 1983 Guide to Monitoring Livestock Use within the Pastoral Zone at PRNS notes "Overuse on the short term will not have a damaging effect on the resource. [Only] When overuse is continued over a number of years, [will] the affected rangeland will suffer serious degradation. Nonetheless, to insure long-term sustainability of grazing in PRNS, we urge PRNS through the RCMP process to collaborate with the ranchers and the public to review and update the mechanism for establishing the number of livestock allowed in order to ensure that, consistent with policy and law, no permanent degradation occurs. USDA DATA: The number of permitted Animal Units (AUs) specified in every PRNS ranch's Special Use Permit (SUP) is typically calculated using the USDA Soil Survey HERE. From this USDA data base, it is possible to determine the forage productivity of any ranch. Subsequent adjustments to the resulting numbers may be made by PRNS, but this USDA Soil calculation is standard in the industry to determine the number of sustainable AUs. Our two AU calculations for the Rogers Ranch (which appears to have no subsequent adjustments) are shown below: [see for PDF for Table]

The orange-shaded columns show forage production using the USDA 1985 data (less the SUP required 1200 pounds/Ac of residual dry matter). This results in forage capable of sustaining 54.5 Animal Units (defined as a thousand pound cow with calf assumed to consume 900 pounds of dry weight forage per month). This matches the 55 AUs allowed in the Rogers Ranch SUP. But there are problems with this and similar PRNS ADM calculations that the RCMP should review and correct going forward. The first problem is that the USDA has recognized that the 1985 data was overly-optimistic and has (on 9/25/14) revised its soil productivity data to more accurately reflect on-the-ground conditions. The USDA data has generally reduced productivity for soils in PRNS, particularly on steep slopes. Thus the blue-shaded column shows the same forage calculation as done for the 1985 USDA data, but using the 2014 data. The USDA 2014 data results in significantly different outcomes for the ranches that we have data for: • 28.6 AU on the Rogers Ranch vs 55 AU allowed currently. • 0 AU on the Zanardi Ranch vs 45 AU allowed currently (the ranch's steep/barren soils produce less than the required 1200 RDM). • 4 AU on the R Giacomini Ranch vs 95 AU currently allowed (when steep/barren soils producing less than 1200 lbs of forage per acre are removed, the remaining 70 acres has sufficient forage for only 4 AU. This may explain why stocking levels calculated using data available in 1990 (when the PRNS Range Monitoring and Guidelines were formulated) now result in portions of PRNS ranches appearing over-grazed. However, site-specific conditions may also be more favorable than the 2014 USDA data suggests. The PRNS 1990 Range Management Guidelines noted that "range condition and trend can also be evaluated by measuring...pounds per acre of palatable species." We assume that such data can be derived from species composition monitoring and could perhaps be used to adjust the 2014 USDA data to better reflect site-specific conditions. Nevertheless, the 2014 USDA data appears to imply a significant downward trend in allowed stocking levels, and any radical departure from this 2014 data would need to be extensively documented...otherwise, this will play onto the hands of those who wish to end ranching. These people will then claim that because NPS didn't like the new results from the industry standard USDA AU calculation...the same calculation used by PRNS for 50+ years...NPS then simply made up new data to cater to the beef industry. Thus any change from the 2014 USDA data has to be based on good data and good science. It would also seem beneficial for PRNS to be more transparent about how it calculates allowed AUs. For example, when the same 1985 USDA figures used by PRNS are put into the calculation for the Zanardi ranch, the result is 65 AU vs the 45 AU allowed. We presume that USDA Soil Code 185 ("extremely steep") was excluded from calculation, because so doing results in 45 AU that is allowed. However, there may be another basis for excluding acres at the Zanardi ranch because a similar exclusion of steep (50%-70%) slopes in the R Giacomini calculation (using the 1985 USDA data) produces an AU of 97 that does not equal the allowed AU of 95. A review of the 1985 USDA Soil Code descriptions indicates that the typical vegetation on all soils on the R Giacomini Ranch is composed of grasses and forbs, with occasional scattered shrubs, yet we know that substantial wooded areas exist on the site. Thus it appears likely that either some wooded acres or perhaps some fenced riparian restoration acres were removed from the R Giacomini Ranch calculation. In our opinion, the public should not have to refer to the Fair Market Valuation for the breakdown of soil types on each ranch and should not have to guess as to what acres might have been excluded. Instead, we suggest that this data be part of every Permit so that the public, the ranchers and PRNS staff are all on the same AU page. The second problem with PRNS's current AU calculation is average cattle weight. Chapter 6 of the NRCS Range and Pasture Handbook [HERE](#) estimates "as-fed" forage at 3% of body weight per day. Based on a single 1,000 pound cow, this results in the 900 pound divisor in red font in the above spreadsheet. But this 1,000 pound cow estimate, like the USDA Soil data from 1985, is outdated. The USDA National Agricultural Statistics Service data [HERE](#) shows that the average live weight of beef cattle slaughtered in 1984 (roughly the time when the PRNS Range Management Guidelines was formulated) was indeed close to 1,000 pounds (1072 pounds) but that weight has increased by 2015 to 1370 pounds. This higher cow weight is consistent with industry publications [HERE](#), which note "The genetic revolution in the beef cattle industry has brought us tremendous increases...Over the course of thirty years we have increased the mature size of our cows over 300 pounds. Today the average cow in the U.S. weighs 1350 pounds." A 1300 pound beef cow on PRNS ranches is also consistent with local reports [HERE](#). Further, since the PRNS AU calculation includes the cow's un-weaned calf, then the weight of an average calf must be added to the weight of the cow to determine total forage consumption for one Animal Unit. Beef calves when born may weight an estimated 75 pounds and when weaned may weigh an estimated 430 pounds (Holechek et al (2001), for an average weight during consumption of mothers milk of about 250 pounds. When added to the 2015 USDA average cow weight of 1370 pounds, this results in a total for the cow-calf combination estimated at 1620 pounds currently. Using that estimated current weight of 1620 pounds per AU, then the forage requirements at 3% of body weight per day is 1458 lbs. per day. Replacing the 1980's 900 pound divisor in red the above spreadsheet with the

current 1458 pound divisor and using the current USDA Soil Productivity data results in forage capable of sustaining only 17.7 AU, or 68% less than the 55 AUs allowed by the current SUP. Lastly we have reviewed the National Organic Standards Program HERE for calculating daily dry matter intake from pasture. The Program notes that such calculations are "a challenge." We agree. Nevertheless, it appears that these calculations depend on the input of cattle weight data, so they do not appear to inform the question of how much cattle at PRNS actually weigh. Local weights of PRNS cattle may differ from industry-wide averages. PRNS ranchers get paid by the weight of the slaughter cattle, so they likely have detailed data on PRNS cattle weights and if PRNS weights differ significantly from current industry averages, then PRNS should adjust the AU weight appropriately. We urge PRNS through the RCMP process to work collaboratively with PRNS ranchers and the public to develop reasonable estimates of cattle weights to be used in the forage calculations. The third problem is that, astonishingly for a National Park, the PRNS forage calculation assumes that 100% of the available forage (i.e. above the required minimum RDM) is allocated to cattle and 0% to wildlife. The 2004 Non-Native Deer EA "estimated a density of 33.9 black tailed deer per square mile and a population of 1133 + 459 [1592] animals in the pastoral zone...with adults weighing up to 250 pounds...They are characterized as browsers, consuming some grasses but a preponderance of/ orbs and shrubs year-round " Assuming 1592 animals on -25,000 pastoral acres, then the Rogers Ranch 393.7 acres hosts about 25 deer. Using the same forage calculation for deer that is used for cattle, then $250 \text{ lbs} \times 3\% \times 30 \text{ days} \times 12 \text{ mo} = 2700 \text{ lbs /deer/ yr}$. Assuming only 50% of that forage is grass and forbs, then deer on Rogers Ranch consume $2700 \times 50\% \times 25 \text{ deer} = 33,750$ pounds of forage per year. The available Rogers Ranch forage per the 2014 USDA is 309,157 lbs (2014 USDA), so the deer are consuming over 10% of that forage. This is admittedly a very rough estimate; however deer are not the only wildlife consuming forage. Other grazers include mice and rabbits whose collective consumption may exceed that of deer. Whatever the forage consumption of wildlife actually is, it is definitely not zero. But if the allowed number of cattle is calculated on the basis that the cattle consume 100% of the available forage, then either the land is being overgrazed to the extent that wildlife consume forage, or wildlife is being forced out of these National Park lands because there is nothing for them to eat. We urge PRNS through the RCMP process to work collaboratively with PRNS ranchers and the public to develop a reasonable estimate for forage that should be allocated to wildlife. The fourth problem: UC Division of Agriculture and Natural Resources Publication #8092 is the RDM reference used by the SF Regional Water Quality Control Board in its Grazing Waiver program that applies to PRNS ranches R2-2013-0039:[see PDF for Table] In contrast, all current PRNS Grazing Permits contain standard language that states: "The RDM standard recommended by the Soil Conservation Service for Point Reyes and vicinity is 1200 pounds air dry weight per acre as an average for all grazed lands regardless of slope."

Draft General Management Plan and Environmental Impact Statement

Point Reyes National Seashore North District of Golden Gate National Recreation Area Marin County, California

Lead Agency: National Park Service Revisions to the General Management Plan (GMP) for Point Reyes National Seashore (PRNS) and the North District of Golden Gate National Recreation Area (GGNRA) are needed to meet natural and cultural resource management goals. The action alternatives in this Draft Environmental Impact Statement (DEIS) vary in the emphasis they place on the goals and objectives developed by the park. The primary purpose of the GMP is to provide a vision for the parks that will guide how these lands and waters would be managed over the next 15- 20 years. The GMP illustrates desired conditions for natural and cultural resources, and for visitor experiences. According to NPS Park Planning Program Standards, the statutory requirements for general management plans, which were established in 1978 (16 USC 1a-7(b)), require that all such plans address: • measures for preserving resources; • indications of the types and general intensities of development; • identification of and implementation commitments for visitor carrying capacities; and • indications of potential boundary modifications. This Draft General Management Plan (GMP) and DEIS describes and analyzes a preferred alternative and three additional options for future management of the park at PRNS and the GGNRA north district. They are: Alternative A: Continuation of Current Management (No-Action); Alternative B: Emphasis on Preservation and Restoration of Natural Resources; Alternative C: Balancing Cultural and Natural Resources Preservation; and Alternative D: Emphasis on Preserving Cultural Landscapes. The alternatives were developed based on input from numerous interested and affected parties. Alternative C is the NPS preferred alternative. Impact topics assessed in the DEIS include natural resources including air; water; soil; vegetation;

wetlands; special status species; cultural resources including archaeological sites, historic structures, and cultural landscapes; prime and unique farmland; park operations; public health and safety; and the regional and local economics. The comment period on the Draft GMP and DEIS will end 60 days after the notice of availability is published in the Federal Register. Comments should be addressed to: Superintendent, Point Reyes National Seashore, Point Reyes, California 94956 ATIN: GMP Go to the Planning, Environment and Public Comment (PEPC) website at <http://parkplanning.nps.gov/pore> and click on the link for the General Management Plan. Then click on links to find the document and enter your comments there. Public workshops will be held to hear public comments and answer questions. Please contact the Point Reyes National Seashore website at <http://www.nps.gov/pore/> to find date, location and time of these workshops. COMMENTS: Before including your address phone number, email address, or other personal identifying information in your comment, you should be aware that your entire comment, including our personal identifying information, may be made publicly available at any time. While you can ask us in your comment to withhold your personal identifying information from public review, we cannot guarantee that we will be able to do so. As always, the National Park Service will make available to public inspection all submissions from organizations or businesses and from persons identifying themselves as representatives or officials of organizations and businesses. Anonymous comments may not be considered. The comments and feedback received by the National Park Service from the public will assist us in refining the proposal and ensuring that public concerns and issues are included in the final Environmental Impact Statement.

and the Bodega Bay Marine Lab.

In sensitive natural resource areas, which include portions of Bull Point, Drakes Head, the Point Reyes Headlands, Drakes Estero, and two areas of sensitive habitat on the Inverness Ridge, grazing in the immediate vicinity of the resources would be discontinued. When current ranching families choose to retire or move on, ranches in these areas with sensitive natural resources are likely to be prime candidates for closure and restoration under Alternative B.

Habitat restoration in creeks, wetlands, coastal dunes, and headlands would be expanded into other degraded habitat types as a priority. For example, the parking lot at Drakes Beach would be reduced in size to reduce impacts to sensitive freshwater and brackish marsh habitat; and a boardwalk or causeway would be constructed across wetlands bisected by the trail to Abbotts Lagoon to protect federally listed plants. Dune restoration programs would be expanded to include Limantour, North Beach and South Beach. Additionally, a wide range of habitat types would be enhanced or restored through removal of invasive nonnative plant and animal species.

A wildlife corridor between Tomales Point and the rest of the parks' land to allow free movement of elk and other wide-ranging species would be established under Alternative B and park managers would work with other agencies to enlarge the corridor outside the park.

Inventory and monitoring of threatened and endangered species would be expanded and enhanced, and the reintroduction of extirpated species considered. Re-colonization or range expansion of native flora and fauna could be encouraged through habitat enhancement or seed trials.

CULTURAL RESOURCE MANAGEMENT Cultural resource protection actions would be as described above for actions common to all alternatives.

Up to 14 ranches may discontinue operations; although non-historic structures would be removed from these ranches, historic structures would be adaptively re-used.

WILDERNESS Wilderness actions would be as described above for actions common to all alternatives.

VISITOR OPPORTUNITIES AND EXPERIENCES Under Alternative B the parks would emphasize the wilderness or natural experience for visitors and would seek to provide increased opportunities for solitude. Low impact visitor activities would be promoted. The parks' trail system would be improved to enhance visitor

experience and to reduce impacts to natural resources. The trail system would become more self-sustaining when some existing roads are converted to trails. One or more of the four existing walk-in camping areas could be converted to wilderness camps - if so, the number of sites available would be reduced, and the wilderness experience would be enhanced. All visitor centers would be retained, but exhibits, programs, waysides, and interpretive trails would become more focused on ecosystem management, habitat restoration, and wilderness ethics.

SITE SPECIFIC ACTIONS

- **Headlands.** The Headlands Marine Reserve would be enhanced as in Alternative A. The parks would collaborate with California resource agencies and NOAA as in Alternative A. Livestock grazing would be discontinued on sensitive natural resource areas working cooperatively with the ranching family at A Ranch. Exhibits, programs, waysides, and interpretive trails at the Lighthouse Visitor Center would become more focused on ecosystem management, habitat restoration, and wilderness ethics.
- **Tomales Point.** Park staff would evaluate the feasibility of using alternative sources to provide energy to the existing residence at Pierce Point Ranch. A wildlife corridor as described above would be established between Tomales Point and the southern wilderness area.
- **Tomales Bay.** Non-historic structures at Laird's Landing would be removed. The marine science/studies center at Sacramento Landing would be upgraded and the program expanded.
- **Drakes Beach.** The size of the parking lot at Drakes Beach would be reduced to re-establish connectivity between the wetlands complex adjacent to the parking lot and Drakes Bay.
- **Bear Valley.** Site improvements to improve water quality and coho and steelhead trout habitat would be constructed.
- **Drakes Estero.** A feasibility study would be undertaken to determine if Sir Francis Drake Boulevard could be re-routed away from the area where it traverses sensitive wetland and estuarine habitat.
- **Lagunitas Loop.** Residential structures would be evaluated as described above for Alternative A.

BOUNDARY ADJUSTMENTS The National Park Service would seek to expand the boundary of Golden Gate National Recreation area by about 38 acres to incorporate lands directly adjacent to the current boundary on Nicasio Ridge (a.k.a. Solinas Ridge) to protect rare, threatened and endangered endemic plants.

STAFFING AND COSTS As in Alternative A, the staffing level needed to implement Alternative B would be the equivalent of 120 full-time staff members. Volunteers and partnerships would continue to be key contributors to NPS operations. Capital costs are estimated at \$11.5 million and annual operating costs at \$7.8 million.

ALTERNATIVE C: BALANCING CULTURAL AND NATURAL RESOURCES PRESERVATION (NPS PREFERRED ALTERNATIVE) Under this alternative, the parks would be managed to protect and enhance both natural and cultural resources, as well as to enhance recreational opportunities. Zoning would stay very similar to what it is now, with slightly fewer acres in the Ranching Zone (23,710) and slightly more in the Natural zone (28,422) than in Alternative A. Natural resource protection, monitoring and restoration, and invasive nonnative species removal would be expanded compared to Alternative A, but less than in Alternative B.

Small scale measures would be used to protect sensitive resources from grazing as they would under all alternatives.

The existing shuttle system would be studied and considered for expansion, where cost and resource effective, to provide additional service throughout the parks, and would connect to the Marin County bus system.