National Park Service
US Department of the Interior

Point Reyes National Seashore
California

Ranch Comprehensive Management Plan Environmental Assessment

Point Reyes National Seashore

Public Workshop Comment Summary Report

February 2015

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INTRODUCTION

In late November 2014, the National Park Service (NPS) held two public workshops (November 20 and 21, 2014) in Point Reyes Station, California and had a 10-day public comment period. This solicitation involved public input on various potential management actions that could be implemented under the Ranch Comprehensive Management Plan/environmental assessment (Ranch CMP). This solicitation of public comments was in addition to the public scoping period that occurred from April 21, 2014, through June 2, 2014. These public workshops but were conducted to maintain public involvement in the Ranch CMP and to collect thoughts, ideas, and concerns from the public regarding potential alternative actions. Each of the two public workshops was held at the Point Reyes Station Dance Palace and followed a similar format.

The National Park Service issued a press release to more than 35 Bay Area media outlets and to the Los Angeles Times on November 3, 2014, announcing the dates, times, and places of the public workshops. The public comment period was open from November 17, 2014 through November 26, 2014. More than 100 interested individuals and organizations were notified via email about the workshops and the open comment period, and the NPS PEPC website (http://parkplanning.nps.gov/ranchcmp) was activated for the public to submit comments. At each public workshop, NPS staff provided handouts (see appendix 2), which included information about the background of the project, purpose and need, Tule elk management practices, ranching management practices, and information on how to comment on the project, including directing comments to the NPS's PEPC website. This information was also available through the park's website. Park staff was available to answer questions and provide additional information to the public workshop attendees.

The first public workshop was held on November 20, 2014, from 3:00 p.m. to 5:30 p.m. This workshop was designed to solicit public input on both current ranching practices and potential ranching practices that could be implemented under the Ranch CMP. The workshop began with brief introductions by park staff and workshop facilitators from Louis Berger who were present to help facilitate the workshop. Park staff identified the objectives of the workshop and then provided a brief presentation identifying potential ranching practices that could be implemented under the Ranch CMP (this presentation was posted on the project's website following the public workshop). The participants were informed that there would be four discussion topics to select from, and two discussion sessions, and that each participant would have the opportunity to discuss two discussion topics (one discussion topic per discussion session). Participants then chose one of four discussion topics, where each participant discussed the issues, concerns, and potential management actions related to the following topics. Additionally, each discussion topic had questions that the participants were encouraged to answer. The discussion topics and questions are listed below.

- Pasture Management – (brush and weed control, fencing)
  - Compare how these practices benefit ranching and natural resource management.
  - Compare any challenges for ranching and natural resource management that might occur from these practices.
  - What are the best ways to implement these practices at a national seashore? Does the total number of acres of a practice matter? How?
- Pasture Management – (soil preparation, seeding, harvest mowing, nutrient management)
  - Compare how these practices benefit ranching and natural resource management.
  - Compare any challenges for ranching and natural resource management that might occur from these practices.

    - What are the best ways to implement these practices at a national seashore? Does the total number of acres of a practice matter? How?
- Diversification
    - What does the term "diversification" mean to you in relation to ranching practices?
    - Are there additional opportunities/activities that could be considered?
    - What are the best ways to implement these practices at a national seashore? Does the extensiveness of a practice matter? How?
- Succession
    - If a current family no longer wishes to ranch, what would be an appropriate process to choose the next lessee?
    - If no immediate family members wish to continue, who should be a candidate for a non-family transfer?
    - What criteria would you recommend that should be used to select a new operator?
    - Are there other models for allowing transition of operations if the current family wishes to cease ranching?

The participants were then given instructions and ground rules for the group discussion sessions (see appendix 2). Each group was instructed to self-select a "facilitator" and a "recorder/reporter." The facilitator was in charge of guiding the discussion to make sure the group stayed on topic and kept track of time to ensure that the group had enough time to address all of the issues for the respective topic. The recorder/reporter recorded the group's ideas, comments, questions, and concerns on flipcharts that were provided for each group. The recorder/reporter also reported the group's discussion, and the ideas, comments, questions, and concerns they had to the larger workshop. Discussion groups were directed to list three items discussed for the report out and if time allowed additional items could be added. This was assisted by a workshop facilitator, who gave each reporter a microphone and two minutes to report to the larger group. Each group discussion session had 25 minutes to discuss their topic and organize their comments to report to the entire public workshop. Flipcharts were used to collect comments from the group and the recorder/reporter used them when addressing the larger group (these flipcharts were typed up and are provided in Appendix 1). Each group had two minutes to report their discussion to the workshop. After each group reported, each participant moved to a different discussion topic to have a second round of group discussions. The same format, topics, and discussion questions were used for the second group discussion. After the second round of group reporting, NPS staff thanked the public for participating and adjourned the workshop.

Similar to the previous day's public workshop, the second public workshop was held on November 21, 2014, from 5:30 p.m. to 8:00 p.m. This workshop was designed to solicit public input on current Tule elk management actions, as well as potential Tule elk management actions that could be implemented under the Ranch CMP. The workshop began with brief introductions by park staff and workshop facilitators from Louis Berger who helped facilitate the workshop. Park staff identified the objectives of the workshop and made a brief presentation identifying potential Tule elk management actions that could be implemented under the Ranch CMP. Participants split into small groups and took part in a discussion session focused on the following questions:

- #1: What combination of tools do you think would work to allow a managed Tule elk herd (limited population size, limited range, or both) in the pastoral zone? Identify actions that are long-term continuous versus immediate need or as needed.
- #2: What combination of tools would work if the goal was to keep Tule elk out of the pastoral zone? Identify actions that are long-term continuous versus immediate need or as needed.

The participants were given instructions and ground rules for the group discussion session (see appendix

2). Similar to the previous day, each group chose a "facilitator" and a "recorder/reporter," who were responsible for the same tasks described above for the first session. The group discussion session lasted 55 minutes. Each group had two minutes to report to the workshop for the first question and another two minutes for the second question. After the reporting sessions concluded, NPS staff thanked the public for participating and adjourned the workshop.

A total of 200 people attended the two workshops (105 people attended the first workshop, and 95 attended the second workshop).

During the comment period, 23 pieces of correspondence were entered into the PEPC system, and eleven letters were sent directly to the park. Interested parties were encouraged to enter their comments directly into PEPC. Some correspondences were also sent directly to the park. All correspondences collected at the public workshops, through PEPC and sent directly to the park were read, and are summarized in the next section of this report.

SUMMARY OF PUBLIC COMMENTS RECEIVED

Ranching Practices

- Diversification
  - Commenters suggested that diversification should be encouraged, and should include row crops, non-silage crops, dryland farming, other livestock, additional worker housing, small-scale processing of dairy products, sales of products produced on ranch land, providing accommodations for visitors (such as bed and breakfast facilities), educational programs, and farm tours. Commenters suggested that diversification would provide flexibility for ranchers, and provide multiple income streams for the ranchers.
  - Commenters suggested that diversification should be allowed, but limited to exclude commercial development, which would likely result in increased traffic and heavy equipment at the park.
  - Commenters stated opposition to diversification, suggesting that allowing other livestock at the ranches would attract predators such as bobcats, coyotes, and weasels. Further, commenters suggested that new row crops would also attract other animals competing for food, such as gophers, mice, voles, and rabbits.
  - Commenters suggested that the park assess the impacts of diversification before allowing the practice in the park. They further suggested that the park should assess if there are certain areas within the park that are more suitable for diversification than other areas.
  - Commenters suggested that clear guidelines for diversification are needed.
- Succession
  - Commenters suggested that the park should ensure the long-term future of ranching within the park, including leasing ranch land to a family member of the most recent park rancher, leasing ranch land to a neighboring rancher within the park, and leasing ranch land to a non-neighboring rancher within the park.
  - Commenters suggested that succession should be limited to family members who have worked the ranch and plan to continue as on-site ranchers. If no family member wants to continue, the land could be reassessed, so that some areas with sensitive habitat could be pulled from ranch uses and other pastures can be added to existing lease areas to make them more efficient.

- Commenters opposed putting ranch leases up for a public bid, which could lead to industrial agriculture and potentially change the character of the park.
- Commenters suggested putting the ranch leases up for a public bid, but only if best management practices are guaranteed by the bidder.
- Commenters were opposed to any type of succession of ranch lands, suggesting that ranch lands should be returned to their natural environment once a leaseholder leaves the land. Commenters suggested that this is supported by the park's enabling legislation and the Organic Act.
- Commenters suggested that a fair worker wages and housing options should be considered with succession.

- Pasture management
  - Soil preparation
    - Commenters asked about the purpose of and need for no-till practices.
    - Commenters stated opposition to tilling, ripping, discing, and plowing.
    - Commenter suggested that aeration should be allowed in limited areas within the ranch core.
  - Nutrient management
    - Commenters suggested that spreading manure and compost should be allowed in limited quantities.
  - Harvest mowing
    - Commenters stated opposition to harvest mowing, including silage, haylage, hay, and windrowing.
    - Commenters suggested that the park should expand the ranchers' ability to grow silage.
    - Commenter provided website links to articles that describe the effects of silage production and forage farming on birds.
  - Seeding
    - Commenters suggested that the park should seed various areas of the park with plants that are palatable for cattle and Tule elk to eat.
  - Brush and weed control
    - Commenters suggested that pesticides and herbicides should be prohibited within the park and that this practice should be prohibited within any national park unit.
    - Commenter suggested that pasture and meadow improvements, such as the removal of velvet grass and thistle, should be implemented.
  - Fencing
    - Commenter suggested that fencing in the park is unlawful, per U.S. Code Title 43, Chapter 25, Section 1061-66.
- Other/general comments on ranching practices
  - Commenters suggested that all ranching activities on park land should be discontinued, and that ranch land should be restored to its natural condition. Commenters suggested that the ranchers do not have a "right" to ranch within the park, because ranching can be allowed at the Secretary of the Interior's "discretion."
  - Commenters provided suggestions about other actions that the park should pursue, as well as impacts that should be considered in the Ranch CMP such as: forming an advisory group consisting of lease holders, NPS staff, and other experts in the field of ranching and wildlife management; adding educational programs at the park; and analyzing the impacts of (1) light

pollution from ranching, (2) domestic pets on the ranches; (3) different trough designs to minimize impacts on wildlife, and (4) wind turbines in the park.

- Commenters suggested that the Ranch CMP requires an environmental impact statement rather than an environmental assessment. Commenters also suggested that the park should update its General Management Plan before addressing the continuation of ranching in the park.
- Commenters suggested that the National Park Service has been pre-decisional with this planning process, stating that the park has already determined that ranching will continue at the park without a full analysis under the NEPA process.
- Commenters asked how best management practices would be enforced at the park.

Tule Elk

- Fencing
  - Commenters suggested that the Tule elk should be fenced and harvested as local, organic meat to surrounding restaurants.
  - Commenters suggested that the park should translocate the Tule elk to the Limantour Beach area, and construct a fence there to contain them.
  - Commenters suggested that fencing should be used to fence cattle in ranch lands, rather than enclosing Tule elk in other areas.
  - Commenters stated opposition to Tule elk-proof fencing between the pastoral and wilderness areas of the park, suggesting that it would obstruct the natural movement of wildlife, alter the landscape, and intrude into wilderness areas.
- Contraception
  - Commenters stated opposition to using contraceptives on Tule elk.
  - Commenters suggested that they were opposed to using contraceptives given the lack of data currently available pertaining to the impacts on the Tule elk, suggesting that the National Park Service should continue to research this option in the event that contraception becomes a viable tool that does not have adverse impacts on the Tule elk.
- Translocation
  - Commenters suggested that Tule elk should not be translocated within or outside of the park and that translocation should not be a management action.
  - Commenters suggested translocating Tule elk into the wilderness areas of the park. Commenters also suggested that the park should enhance the wilderness areas to better accommodate the Tule elk. Commenters suggested that the park should translocate the Tule elk to the Limantour Beach/Wilderness area, and construct a fence there to contain them.
- Hazing
  - Commenters suggested that hazing Tule elk appears to be an effective tool that should be used under this plan.
- Habitat enhancement
  - Commenters suggested that the park should enhance the Tule elk habitat outside of the pastoral zone to attract the Tule elk to these areas.
  - Commenters suggested that the park should seed various areas of the park with plants that are palatable for cattle and Tule elk.
- Compensation
  - Commenters suggested that the ranchers should be compensated for the repairs they make on their fences, as well as losses they incur as a result of impacts from Tule elk.
- Lethal removal
  - Commenters were in favor of culling/lethal management of the Tule elk. Commenters suggested that ranchers should be allowed one hunting tag per year, and that Native Americans should be allowed to hunt the Tule elk, using traditional methods.
  - Commenters stated opposition to lethal management of the Tule elk, stating that they are an important ecological asset to the area.
- Johne’s Disease
  - Commenters suggested that the National Park Service should continue testing for Johne’s disease in Tule elk and cows to allow for translocation.

- Other/general comments on Tule elk management
  - Commenters suggested that Tule elk are an endangered California native species that should be protected in the park.
  - Commenters suggested that the park should conduct a carrying capacity analysis to determine if there is enough available land for the current Tule elk population. Commenters suggested that if this analysis determines that there is not enough land for the Tule elk, then the cattle operations and ranch land should be reduced (not the Tule elk population).
  - Commenters asked about the costs of the various ranch management and Tule elk management actions, and questioned who would pay for the actions (the ranchers, the National Park Service, or some combination).
  - Commenters were concerned that that the National Park Service may not have the long-term commitment to manage Tule elk in the park.
  - Commenters suggested that a "one size fits all" approach is not feasible, and that a case-by-case basis should be used to manage Tule elk in different areas of the park.
  - Commenters suggested that the park should use all available tools to mitigate the problems that Tule elk are causing to ranch land, as soon as possible. Commenters stated that the Tule elk threaten the organic status of ranch land.
  - Commenters were in favor of removing all Tule elk from the pastoral zone by any means necessary.

Comments on Workshops

Some commenters provided comments on the format of the public workshops, the materials that were provided at the public workshops, and the public comment process in general. These comments are summarized below.

- Commenters noted that the format and organization of the public alternative workshops was helpful and afforded opportunities for everyone to provide comments. Commenters also stated that the informational handouts were helpful.
- Commenters suggested that the public alternative workshops were poorly organized and skewed in favor of ranching opportunities rather than natural resource protection. Commenters noted that the ranching practices workshop did not allow enough time to discuss the issues in the working groups. Commenter suggested that an NPS staff member should have been the "facilitator" in each working group, as some ideas were not captured on the flipcharts.
- Commenters suggested that the National Park Service has not engaged in sufficient public scoping, and instead has acted to favor public participation and input from a select group of stakeholders.
- Commenters suggested that the National Park Service ignored the comments submitted during public scoping.
- Commenters suggested extending this comment period.
- Commenters questioned, citing the Public Workshop handout, why the National Park Service would hold 50 meetings with ranchers, and not hold meetings with organizations representing users of the park. They suggested that this showed bias in favor of the ranchers.
- Commenters stated, citing the Public Workshop handout, that continuing ranching within the park would not strengthen the natural resources of the park, but would weaken them.

APPENDIX 1: COPIES OF CORRESPONDENCES

Comments Received in PEPC

Correspondence ID: 1 **Project:** 51867 **Document:** 62540
Outside Organization: Unaffiliated Individual
Affiliation:
Received: Nov,19,2014 18:37:50
Correspondence Type: Web Form
Correspondence: I support modifications to Ranch Infrastructure, including Small scale processing of dairy products,retail sales of products produced on the ranch and other local farm products.
I would also like to see additional worker housing
I also support the idea of allowing further broadening the leases to include things like tours, weddings, farm stays, rancher/park collaboration.
Please help keep the ranches and promote the park as a collaborative partner.

Thank you.

Correspondence ID: 2 **Project:** 51867 **Document:** 62540
Outside Organization: West Marin Fund Unaffiliated Individual
Affiliation: Member
Received: Nov,21,2014 11:51:26
Correspondence Type: Web Form
Correspondence: I attended the Ranching Practices Workshop on 11/20/14. The organization seemed well thought out and afford opportunities for everyone to comment. I have one observation/suggestion which in my view applies to all the areas under discussion, e.g., diversification. I would also include the Elk management question although I am unable to attend this evening's workshop.

I suggest the formation of working groups to address the specific areas of interest or concern. Working group membership would include the interested lease holders, relevant park staff and in addition technically proficient members from such organizations as the RCD, UC Davis Extension, etc. Broadening the base beyond park staff and lease holders would help bridge the contrasting points of view typical in a lease holder-park staff working group allowing both park staff and lease holders to benefit from informed suggestions from technically proficient adjunct working group members from relevant and trusted organizations. Such 'bridge' members would enhance the chance of arriving at widely supported policies and programs to the benefit of NPS as the landowner, the lease holders and the public.

Thanks for the open and transparent process.

Correspondence ID: 3 **Project:** 51867 **Document:** 62540
Outside Organization: Unaffiliated Individual
Affiliation:
Received: Nov,21,2014 23:28:17
Correspondence Type: Web Form
Correspondence: Dear Superintendent:

I appreciate the opportunity to share my thoughts on the Ranch Management Plan. I'd like to address a few of the topics that are on the table and share my thoughts.

I realize the desire for the ranching community to find new ways to derive income from their livelihoods. Their request to have on site bed and breakfast operations, overnight stays, educational programs or farm tours I think are activities the general public would enjoy and could be done with minimal impact to the park and its resources. Obviously there are many items that would need to be worked out. But I support the effort and think with cooperative efforts, it could be a viable addition to their operations.

Next is the consideration of adding new diversification of crops and animals in the park. I am against this consideration. It is my belief that any introduction of new crops or animals will cause conflict between ranchers and the animals in the park.

The addition of goats, pigs, chickens (where not today) will only cause temptation by bobcats, coyote, weasels and other animals to prey on these new potential food sources. The addition of new crops will cause conflict with gophers, mice, voles, rabbits, and other plant eating animals in the park.

It is clear by example. The current elk situation gives clear indication that we are not in a position to manage conflicts between current park animals and current ranch activities. The addition of these potential new conflicts will only cause more issues for the current animals and add additional tension between the public, the park, and the ranching community.

The next topic is elk fencing. If it is illegal to build the considered fences, regardless if you want fences or not, the thought of such an activity should be immediately dropped to stop the further spending of time, money and resources on this topic. If the park decided it was lawful and to use fencing, then only minimal fencing should be used to fence OUT the elk from high value land. No fences should be used to enclose the elk under any circumstances.

If I read US Code Title 43, Chapter 25, Sec 1061-66, the building of the considered fences in the National Park is unlawful and prohibited.

Thank you for taking the time to read my thoughts. There are obviously many more items on the table that deserve comments. But these are the top ones I feel I needed to immediately comment on immediately.

Warmest Regards,
Daniel Dietrich

Correspondence ID: 4 **Project:** 51867 **Document:** 62540
Outside Organization: Unaffiliated Individual
Affiliation:
Received: Nov,22,2014 15:37:28
Correspondence Type: Web Form
Correspondence: I did not see three issues in the public workshop handout that I believe should be addressed in the Ranching CMP:

1) Light Pollution. A vital resource of the National Seashore is its night view of the stars. Outdoor night lighting on the ranches should all be shrouded and brilliance of the lights used should be minimized in order to limit light pollution.

2) Domestic Cats. Ranchers should not maintain outdoor cats. These have been demonstrated by numerous studies to have a significant negative impact on wildlife. As a vital migration stopover for numerous species of birds, cats should not be allowed in the National Seashore. Pets should be kept indoors and feral animals should be removed.

3) Water Troughs. These should be designed to allow birds to readily climb out of the troughs. Newer trough designs are available that lie near the ground and allow easy access to and away from the water for all species. An analysis of trough designs should be done to determine the best Marin County options to prevent negative impacts on wildlife.

4) Wind Turbines. Only small scale, lower speed turbines that have been demonstrated to be safe for birds

and bats should be allowed on the ranches, if any.

Thanks.

Correspondence ID: 5 **Project:** 51867 **Document:** 62540
Outside Organization: The Wildlife Trust Unaffiliated Individual
Affiliation: OffcialRep
Received: Nov,22,2014 19:17:31
Correspondence Type: Web Form
Correspondence: To: The National Park Service - Pt. Reyes National Seashore - Nov. 22, 2014

1. Six months ago I participated in the Scoping Options and Comments exercise for the Comprehensive Ranch Management Plan along with thousands of other U.S. citizens, who mostly were in favor of enhancing Pt. Reyes National Seashore's (PRNS) natural resources (your core mission) including letting free roaming tule elk continue to thrive throughout the Park including within the so-called Pastoral Zone. There was also little interest by the citizens of the United States for any expansion of the current commercial ranching operations into more diversified agriculture, especially any kind of cultivation. In fact, there were hundreds of comments, including mine, that called for the eventual phase out of the ranching operations. As of now, late November 2014, it appears that my scoping comments and those of hundreds of others have been ignored and you are pushing stubbornly ahead with an agenda that seems to have been written by and for the financial benefit of the current private commercial ranch users within PRNS - all at the cost to the natural resources of PRNS, including tule elk.

2. Please re-read and take-in my Scoping Options and Comments as it will help inform you about how to stay in good legal standing with the direction that the Park Service should be taking regarding the Pastoral Zone, and it will also provide you with insights that it is the agricultural operations, including livestock grazing, that have to be "managed" and eventually phased out of PRNS, as opposed to the tule elk which must (by law) be allowed to expand and thrive all throughout PRNS.

3. Regarding the workshops held on Nov. 20 & 21, 2014, I was able to attend the workshop on Nov. 21, 2014 and I must say that in my over 40 years of attending public hearings and workshops, this one was the most blatantly organized to be skewed in favor of private interests and against the public interest.

The NPS should have instead convened a workshop on solutions to the impacts that continuing ranching operations are having on the natural resources of PRNS, including tule elk. The workshop I attended flipped this idea on its head, and tried unapologetically to somehow defend "managing" tule elk to the benefit and wishes of the current commercial ranchers.

4. The proposed Environmental Assessment (EA) is not going to provide enough scientific information and due-diligence to legally proceed with grazing leases of 20 years (or any other length) and therefore, a full Environmental Impact Statement (EIS) is going to have to be done if the NPS is determined to proceed in this extra-ordinary expansive direction.

5. Ranching Practices Workshop;I make the following Approvals or Disapprovals:
5a) Pasture Management:
Soil Preparation
Aeration - Approve in very limited areas near core ranch area.
No till - Disapprove in any form.
Tilling - Disapprove in any form including, ripping, discing, plowing.

Seeding - Disapprove in any form using exotic non-native plant seeds.

Nutrient Management
Manure - Approve spreading in limited quantities lightly on the land.
Compost - Approve spreading (not turning under) in limited quantities.
Commercial Fertilizer - Disapprove use on both Organic and Non-Organic.

Harvest Mowing - Disapprove in any form using harvest mowing including silage, haylage, hay and windrowing.

Brush Control and Weed Control
Weed Mowing (early season) - Approve.
Brush Mowing - MUST be timed to avoid bird breeding season - Approve.
Plowing/discing/tilling/ripping - Disapprove in all forms.
Scraping - Disapprove in any form.
Fire - Approve only under supervision of a native plant ecologist.
Seeding - Disapprove any kink of seeding requiring soil manipulation.
Chickens foraging on weeds - Disapprove any kind of commercial chickens.
Herbicide -Disapprove in any form or area.

Fencing
ï‚·ï€ Barbed wire livestock fencing - Only tule elk friendly middle wire barbed wire approved (max 38" high).
ï‚·ï€ Electric fencing - Only tule elk friendly fencing approved (max 38" high)
ï‚·ï€ Breaking pastures up into several smaller pastures for more rotation - Disapprove of any new fenced areas without removing current fences and they must be tule elk friendly fences (max 38" high).
ï‚·ï€ Wildlife friendly fencing - Approve (no barbs on upper or lower strands, max 38" high, minimum 12" gap at bottom.
ï‚·ï€ Different type of fencing may be necessary to support other practices (e.g. row crops, sheep, etc.) - Disapprove different types of non-wildlife friendly fences and row crops, sheep, etc. should not even be considered.

5b) Diversification
Row Crops - Disapprove of any and all row crops.
Non-silage crops - Disapprove of any and all non-silage crops.
Dryland farming - Disapprove of any ad all dryland farming.
Other Types of Livestock - Disapprove of domestic livestock in PRNS.
Stockers (cattle) - This would typically include yearling steers and heifers rather than cow/calf operations - Disapprove.
Chickens, ducks, geese, and turkeys - Disapprove.
Pigs (both in ranch core and pastures) - Disapprove.
Sheep (may require woven wire fences and dogs for protection)-Disapprove.
Goats - Disapprove in all forms.
Rabbits for meat (in ranch core) - Disapprove.
Horses/horse breeding - Disapprove.
Beekeeping - Approve in ranch core.

Worm castings in ranch core - Approve.

5c) Modifications to Ranch Infrastructure
Small scale processing of dairy products
On-farm retail sales of products produced on
the ranch and other local farm products - Disapprove.
Additional worker housing - Disapprove.

5d) Other Diversification Activities
Tours with visitors and weddings - Disapprove.
Farm Stay/Bed & Breakfast _ Disapprove unless cattle are eliminated.
Collaboration with the park on education programs for public- Disapprove.

5e) Succession
Lease to a family member of most recent park rancher - Disapprove.
Lease to a neighboring rancher within the park - Disapprove.
Lease to a non-neighboring rancher within the park - Disapprove.
Put it out for bid for park ranchers only-based on conservation-focused
grazing management, not price - Disapprove.
Consider allowing an employee of a park ranch
to take over operation or to be eligible to bid for a lease - Disapprove.
Put it out to competitive open bid-based on
conservation-focused grazing management, not price - Disapprove.
Note: Current lease/permit holders when no longer operating, must by
law, vacate the ranch to the Park Service and the land must be
restored to its natural coastal prairie ecosystem.

6, Tule Elk Workshop; I make the following Approvals or Disapprovals:
6a) Direct Population Management
Contraception - Disapprove of any and all for tule elk.
Translocation outside the Park (CDFW) - Disapprove.
Translocation within the Park - Disapprove.
Lethal Removal - Disapprove.
Hazing - Disapprove.

6b) Indirect Population Management
Fencing
Fencing Approaches
I agree with CDFW when they say, "Where possible, the CDFW has moved
away from managing fenced-in elk herds." Elk should not also be fenced
OUT of the PRNS Pastoral Zone.

Rocky Mountain National Park recently fenced elk out of willow and aspen
groves to protect these sensitive habitats from overgrazing by an
expanding elk population. - Approve this approach with proper
environmental vetting.

The CDFW's approach is to encourage landowners to fence elk out of
private lands. - Approve, and it must be explicitly understood that PRNS
and its "Pastoral Zone" is NOT private land and is instead public land
owned by the American people to be lawfully managed by the National Park

Service.

A fence-out technique at Point Reyes could include erecting fences around ranches or high value pastures. - Disapprove. Only wildlife (elk) friendly fencing must be used within PRNS, with the only exception being to prevent expanding elk herds from harming special unique sensitive natural ecological areas or restoration project.
ï,·ï€
A proposal has been made to construct an elk fence along the wilderness/pastoral zone boundary, from the Estero de Limantour to the top of Mount Vision, in order to keep elk within the wilderness area. - Disapprove. Such a fence would have to undergo a full EIS and for many reasons, there is no way it would pass this required test.

Note: Tule elk at PRNS are telling us where they prefer to be, and the NPS should accommodate these inclinations and the needs of the wild tule elk over any fantasies and desires of the domestic cattle operation owners.

Rather than having a workshop on solutions to the impacts that continuing ranching operations are having on tule elk, this workshop flipped it on its head, and tried unapologetically to somehow defend "managing" tule elk to the benefit and wishes of the current ranchers - clearly favoring private interests over public interests.

4. The proposed Environmental Assessment (EA) is not going to provide enough scientific information and due-diligence to legally proceed with grazing leases of 20 years (or any other length) and therefore, a full Environmental Impact Statement (EIS) is going to have to be done if the NPS is determined to proceed in this extra-ordinary expansive direction.

5. Ranching Practices Workshop;I make the following Approvals or Disapprovals:
5a) Pasture Management:
Soil Preparation
Aeration - Approve in very limited areas near core ranch area.
No till - Disapprove in any form.
Tilling - Disapprove in any form including, ripping, discing, plowing.

Seeding - Disapprove in any form using exotic non-native plant seeds.

Nutrient Management
Manure - Approve spreading in limited quantities lightly on the land.
Compost - Approve spreading (not turning under) in limited quantities.
Commercial Fertilizer - Disapprove use on both Organic and Non-Organic.

Harvest Mowing - Disapprove in any form using harvest mowing including silage, haylage, hay and windrowing.

Brush Control and Weed Control
Weed Mowing (early season) - Approve.
Brush Mowing - MUST be timed to avoid bird breeding season - Approve.
Plowing/discing/tilling/ripping - Disapprove in all forms.
Scraping - Disapprove in any form.

Fire - Approve only under supervision of a native plant ecologist.
Seeding - Disapprove any kink of seeding requiring soil manipulation.
Chickens foraging on weeds - Disapprove any kind of commercial chickens.
Herbicide -Disapprove in any form or area.

Fencing
ï‚·ï€ Barbed wire livestock fencing - Only tule elk friendly middle wire barbed wire approved (max 38" high).
ï‚·ï€ Electric fencing - Only tule elk friendly fencing approved (max 38" high)
ï‚·ï€ Breaking pastures up into several smaller pastures for more rotation - Disapprove of any new fenced areas without removing current fences and they must be tule elk friendly fences (max 38" high).
ï‚·ï€ Wildlife friendly fencing - Approve (no barbs on upper or lower strands, max 38" high, minimum 12" gap at bottom.
ï‚·ï€ Different type of fencing may be necessary to support other practices (e.g. row crops, sheep, etc.) - Disapprove different types of non-wildlife friendly fences and row crops, sheep, etc. should not even be considered.

5b) Diversification
Row Crops - Disapprove of any and all row crops.
Non-silage crops - Disapprove of any and all non-silage crops.
Dryland farming - Disapprove of any ad all dryland farming.
Other Types of Livestock - Disapprove of domestic livestock in PRNS.
Stockers (cattle) - This would typically include yearling steers and heifers rather than cow/calf operations - Disapprove.
Chickens, ducks, geese, and turkeys - Disapprove.
Pigs (both in ranch core and pastures) - Disapprove.
Sheep (may require woven wire fences and dogs for protection)-Disapprove.
Goats - Disapprove in all forms.
Rabbits for meat (in ranch core) - Disapprove.
Horses/horse breeding - Disapprove.
Beekeeping - Approve in ranch core.
Worm castings in ranch core - Approve.

5c) Modifications to Ranch Infrastructure
Small scale processing of dairy products
On-farm retail sales of products produced on the ranch and other local farm products - Disapprove.
Additional worker housing - Disapprove.

5d) Other Diversification Activities
Tours with visitors and weddings - Disapprove.
Farm Stay/Bed & Breakfast _ Disapprove unless cattle are eliminated.
Collaboration with the park on education programs for public- Disapprove.

5e) Succession
Lease to a family member of most recent park rancher - Disapprove.
Lease to a neighboring rancher within the park - Disapprove.

Lease to a non-neighboring rancher within the park - Disapprove.
Put it out for bid for park ranchers only-based on conservation-focused grazing management, not price - Disapprove.
Consider allowing an employee of a park ranch to take over operation or to be eligible to bid for a lease - Disapprove.
Put it out to competitive open bid-based on conservation-focused grazing management, not price - Disapprove.
Note: Current lease/permit holders when no longer operating, must by law, vacate the ranch to the Park Service and the land must be restored to its natural coastal prairie ecosystem.

6, Tule Elk Workshop; I make the following Approvals or Disapprovals:
6a) Direct Population Management
Contraception - Disapprove of any and all for tule elk.
Translocation outside the Park (CDFW) - Disapprove.
Translocation within the Park - Disapprove.
Lethal Removal - Disapprove.
Hazing - Disapprove.

6b) Indirect Population Management
Fencing
Fencing Approaches
I agree with CDFW when they say, "Where possible, the CDFW has moved away from managing fenced-in elk herds." Elk should not also be fenced OUT of the PRNS Pastoral Zone.

Rocky Mountain National Park recently fenced elk out of willow and aspen groves to protect these sensitive habitats from overgrazing by an expanding elk population. - Approve this approach with proper environmental vetting.

The CDFW's approach is to encourage landowners to fence elk out of private lands. - Approve, and it must be explicitly understood that PRNS and its "Pastoral Zone" is NOT private land and is instead public land owned by the American people to be lawfully managed by the National Park Service.

A fence-out technique at Point Reyes could include erecting fences around ranches or high value pastures. - Disapprove. Only wildlife (elk) friendly fencing must be used within PRNS, with the only exception being to prevent expanding elk herds from harming special unique sensitive natural ecological areas or restoration project.
ï,·ï€
A proposal has been made to construct an elk fence along the wilderness/pastoral zone boundary, from the Estero de Limantour to the top of Mount Vision, in order to keep elk within the wilderness area. - Disapprove. Such a fence would have to undergo a full EIS and for many reasons, there is no way it would pass this required test.

Note: Tule elk at PRNS are telling us where they prefer to be, and the NPS should accommodate these inclinations and the needs of the wild tule elk over any fantasies and desires of the domestic cattle

operation owners.

Correspondence ID: 6 **Project:** 51867 **Document:** 62540
Outside Organization: Unaffiliated Individual
Affiliation:
Received: Nov,24,2014 15:30:12
Correspondence Type: Web Form
Correspondence: Comments on the National Park Service document regarding the Pt. Reyes National Seashore:
Ranch Comprehensive Management Plan Update, November 2014.

William Klitz, Ph.D.
Visiting Scholar
Integrative Biology
University of California
Berkeley, CA 94720-3140
(member of Western Watersheds Project)

The Pt. Reyes National Seashore Administrators have somehow convinced themselves that a predetermined stance speaking to the needs of the Pt. Reyes ranchers is best, while ignoring the many other stakeholders now living through the continued misuse and ongoing destruction of this precious and unique natural resource. A much stronger, more forthright and genuinely content laden workshop exercise would have focused on the phase-out of ranching altogether at Pt. Reyes, rather than present a bureaucratic format that only looks at the extension of ranching leases and expansion of ranching activities for another couple of decades.
What motivates this carefully tailored support for one select group of US ranchers? Why don't all US ranchers get this level of hand holding? Would it have been more efficient to have the local Agricultural Extension conduct this exercise?
You mention "all park dairies are now organic", but what of all other ranching operations? How can you sanction any pesticide and herbicide applications on this National Seashore?
I believe that the Diversification section rises above the inherent misdirection of others in its promotion of a whole range of additional land use activities, so far from those supposedly innocent and 'historic' dairy operations. You seem to have already convinced yourselves (following years of phrase and language refinement) that the commercial ranch operations on Pt. Reyes are a special and integral part of the value of the PRNS. The phase out of ranching altogether is the important question being ignored. A contrasting determination would show that the NPS is complicit in an orchestrated deception that ignores a clear expectation evident at the PRNS creation: that ranching would be phased out.
For a moment consider the often spoken phrase "Historic Ranches" when referring to those agricultural activities on the property Seashore itself. The proposed and currently practiced activities referred to-the original dairy and all of the more recent beef (Stockers), commercial fowl, pigs, sheep, goats etc.-are nothing more than efforts to create more income for the individual operations. This intention is fine and appropriate on the 1,000s of other commercial ranch and ag operations present in California alone. How

can it be justified to carry on this way in a precious natural resource? The founding of ranching in the 1860s on Pt Reyes was a culminating step in the European takeover of western North America-similar fill-in ranch creations, aimed at European takeover and utilization of every suitable habitat, came into being across the America West in those few decades around 1860, now only 150 years past. So, we can say, historic for whom-the endangered flora and fauna, the Native Peoples?
The "Succession" section, I at first thought might be referring to ecological succession, piqued my interest. Instead I see that you meant ownership handover of holdings, to make sure that the "Ranching Now, Ranching Forever" process is maintained. Where is the elimination of ranching and the return to coastal prairie option, as at the very least is implied in the Seashore's creation back in the 1970s?
Why does the Tule Elk Workshop section not mention the status of Tule Elk, an endangered California native, and their population bottleneck within the last century down to a handful of individuals? What fraction of that possible genetic variation of the species is currently present in the Pt. Reyes elk? How can these animals, even in a context of legitimate population management considerations, be cast as a pest and irritant for the ranchers' sake?
I would like to see some documentation of Johne's disease, its biology, hosts and nature, not just a crude raising of the infectious disease specter. You seem to admit that evidence of this condition in the Pt. Reyes herd could not be found. Are the cattle themselves carriers? What animals are potential carriers?
Any discussion of Pt. Reyes Elk should be devoted to the status and numbers of Tule Elk across California, long term goals of population re-establishment in new areas, genetic diversity in existing populations and the potential of introducing natural predators in order to regulate Elk numbers.
If you want to give this workshop and any recommendations coming out of it some real force and legitimacy, an Environmental Impact Report is essential. This Report must include variation in activities among the ranches, as inter-ranch practices appear to be a major component of variable impact on the National Seashore. This could help create an evidence base required for any decisions that could possibly be relatively free of political winds.
The National Park Service carries with it a charge to defend the precious natural areas that it oversees. I hope this is not lost in the Pt. Reyes National Seashore Administration.

Correspondence ID: 7 **Project:** 51867 **Document:** 62540
Outside Organization: Unaffiliated Individual
Affiliation:
Received: Nov,24,2014 18:16:56
Correspondence Type: Web Form
Correspondence: Dear PRNS:

Please create a Ranch Management Plan that 1) offers 20-years leases to the ranches within the Point Reyes National Seashore (PRNS), and 2) fosters a positive working relationship between the Ranches and the PRNS.

Also, please allow for diversification activities that will help these wonderful ranches succeed for 20 years and longer. These diversification activities should include, but not be limited to: row crops, non-silage crops, dryland farming , other livestock, stockers, chickens, ducks, geese, turkeys, pigs, sheep, goats, rabbits for meat, horses/horse breeding, and beekeeping.

Please allow for maintaining, modifying or building structures to support diversification activities or ranch worker housing needs, including: small scale processing of dairy products, on-farm retail sales of products produced on the ranch and other local farm products, additional worker housing, tours with visitors and weddings, and farm stay/Bed & Breakfast operations.

Create succession planning that will ensure the long-term future of ranching within the PRNS, including: leasing to a family member of most recent park rancher, leasing to a neighboring rancher within the park,

and leasing to a non-neighboring rancher within the park.

Please also formulate a Tule Elk management plan that enables the ranches within the PRNS to continue to operations for 20 years and longer.

Best Regards,
Scott McMorrow
Inverness, CA

Correspondence ID: 8 **Project:** 51867 **Document:** 62540
Outside Organization: Unaffiliated Individual
Affiliation:
Received: Nov,24,2014 23:17:31
Correspondence Type: Web Form
Correspondence: Thank you for the community workshops and the opportunity to discuss some of the issues raised by park ranchers and the public.

Regarding the issues about succession, pasture management and diversification, the most important factor is to preserve the compromise that created this National Seashore. Ranching should be continued without significantly altering the character of the landscape and without harming natural resources. Some ideas that have been floated sound like an Agro-Disney park of model agriculture or commercial expansion with kitchens, restaurant, BBQ, sites for weddings, Bed and Breakfast, and so on. None of that keeps the original commitment to preserve the Seashore in an undeveloped state.

I oppose expanding commercial development inside this National Park. When visitors come to the Point Reyes National Seashore they should experience the pastoral and wild zones as intended. PRNS was set up "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." "Remains undeveloped" is a key requirement. To the extent that the National Seashore is held out as a national or world model, it should be a model of preserving ranching and wilderness in an undeveloped state.

I would pick one example which I think shows a much better way to diversify. Marin Sun Farms has a family operated ranch within the seashore - a great example of what was intended in the creation of the Park. Their family decided to branch out to a butcher shop and restaurant and have done that in town. No development was required in the National Seashore, yet people can still eat locally produced food as well as sustainable food from elsewhere in the state in their restaurant. Commercial uses should be located on private land and facilities where there are roads, parking, work force, toilets, and zoning to support it.

There should be no group tours using large buses and no expansion of commercial and work force traffic, heavy trucks or equipment in the National Seashore. The Seashore roads are already well used, easily saturated with traffic, hard to maintain and in places are dangerous.

The core footprint of the ranches should not be expanded to accommodate more parking and overnight stays.

Regarding diversification of animals and changes to pasture management and fencing, a prerequisite to evaluating options is to have an understanding of the impact of each method on natural resources and what planning is needed to locate and manage the new method. What are the impacts on ground nesting birds. over-wintering birds. predators, native plants and other wildlife?

All of the proposed activities should be evaluated to avoid anything which is going to increase food

available to ravens, a major threat to the threatened Western Snowy Plovers. Plowed fields, mowing, BBQ, and scattered picnic use are likely to enhance raven population growth.

Another prerequisite is to do natural resource or natural history assessments of each ranch and nearby areas when relevant. The point is to understand what is most sensitive and important to preserve and protect. Some pastures have native grasses. Some have rare plants and insects. Some have dunes mixed in. some water courses seem well protected and others seem "trashed". Some hills are well vegetated and some are heavily grazed, trampled and eroding. Some of these problems have persisted for years. Why? Ranchers and farmers are good stewards of the land, but some sites are baffling exceptions. Study conservation and agricultural easements done on privately owned ranches which usually have natural history and ranch management plans that are detailed. These can suggest model provisions for twenty year leases on the National Seashore. No twenty year lease or new activity should be approved without a full study of existing and potential adverse effects on natural resources.

The concepts of best practices and conservation-focused grazing are used without being defined. These practices should be known and evaluated for the National Seashore. And, how will they be enforced?

If the ranchers can prioritize their wishes with a sense of preserving the Seashore in an undeveloped state and in terms of best conserving and improving protection of natural resources, then perhaps their wish list can be winnowed down. Every new diversification or expansion of pasture management places a time burden on the National Park Service. The expectation should be for modest, and manageable change. If there is 15% o pasture management and more might benefit ranchers, maybe the next step is 20%. If there is a new product that seems to have minimal adverse impacts, perhaps it can be tried in some locales. With twenty year leases, new uses can be added but it will be difficult to remove a use that is problematic. And, NPS must be able to staff or obtain the necessary time and expertise to manage whatever they authorize. NPS must retain authority to make decisions on what products can be grown on each ranch. The criteria should be fair but not every ranch has the same conditions, or goals.

There was mention of advisory groups of agriculture experts to advise the park what to do. That might be useful, but the groups must have a balance of experts in conservation. People from California Audubon, Nature Conservancy, and Point Blue have done this extensively and I am sure can help. Local experts will know how the landscape is used and can be improved to the benefit of native plants, birds and other wildlife. People with conservation expertise must be a part of the advisory group. And, there must be local natural history research commensurate with the program undertaken by NPS. Not all the answers are well understood. As we well know, agricultural interests will attack federal scientists for not having perfect information on risks. Yet we know from local and national experience that the adverse risks often occur. We should have listened to the federal scientists.

Consider if there is an opportunity to expand native grasslands in the pastoral zone. Timed grazing might support such use.

Subsidizing conservation activities should be considered.

It is important to note that the primary purpose of the ranches when the park was formed was dairy and cattle. That is probably still true. Also, Marin County has on numerous occasions stressed the importance of maintaing ranching on the Seashore for the overall economic health of ranching in Marin County. I think the focus of agriculture should continue to be cattle and dairy ranching.

The fact that these are family ranches is important. I would like succession to be limited to family members who have worked the ranch and plan to continue as on-site ranchers. When no family member wants to continue that is a great opportunity to rezone. Some areas with sensitive habitat can then be

pulled from ranch uses and other pastures can be added to existing lease areas to make them more efficient. The first step when there is a break in succession should be to determine what is the best use. Then, areas to remain in pastoral use can be offered to other leaseholders, and perhaps also offered to employees who have long term experience living and working on a Seashore ranch. I oppose putting ranch leases up for bid which may tend towards industrial agriculture and potentially change the character of the Seashore.

I support the proposal for collaboration on education programs as long as there is a structure to maintain the quality of the program, The Point Reyes National Seashore Association has the skills and should manage the field programs. If there is sufficient interest, NPS could also manage a docent program.

I oppose an elk proof fence between pastoral and wilderness zones. It obstructs or interferes with too much natural wildlife flow, alters too much of the landscape, involves too much construction in wild areas, and lessens the resource value of this National Park. Furthermore, the elk will find a way around it. CDFW seems to be endorsing in-pasture fencing if fencing is required.

I prefer to see treatments in border pastures, such as human or cattle presence and hazing activity to encourage the elk to use the wilder areas and areas with marginal value for cattle. Would a herd of stockers discourage elk presence in a border pasture?

I realize some ranchers are irritated by the elk but I haven't seen evidence of financial losses. I think beef prices have been good and ask the Park Service to actually document losses before taking action.

If a decision is made to control the size of herds and transfer is not allowed, I believe lethal removal by sharpshooters is the least painful way to do the job. In this context, I would be OK with some ranchers incorporating elk harvests into their diversification.

There is no way that there can be a guarantee that the ranches will be profitable. If it is possible to help them be profitable without harming the values of the Seashore, then that is fine and should be done.

Thank you for the opportunity to comment.

Correspondence ID: 9 **Project:** 51867 **Document:** 62540
Outside Organization: Unaffiliated Individual
Affiliation:
Received: Nov,24,2014 23:59:25
Correspondence Type: Web Form
Correspondence: this is a test based on communication from members of the public that they cannot submit their comments on November 24, 2014.

Correspondence ID: 10 **Project:** 51867 **Document:** 62540
Outside Organization: Unaffiliated Individual
Affiliation:
Received: Nov,25,2014 08:35:08
Correspondence Type: Web Form
Correspondence: Dear NPS,

I urge you to take all actions that will ensure the continuation of ranching (and farming) on the properties currently used for these purposes within the Point Reyes National Seashore.

By way of full disclosure: I have no economic, family, or other connection to the ranches. I write only as

someone who loves PRNS and who believes that ranching should continue and should be supported so that it thrives.

I have long enjoyed the PRNS- -first as a frequent visitor to the area and now as a resident. For me, the presence of the ranches has enhanced my love of the Seashore. My understanding of the creation of the Seashore is that the founders wanted ranching to continue. They were wise in that vision. The ranches enhance the use of this important land.

I value nature, and the important role it plays in giving relief from the hustle, bustle, noise and other impacts of modern life. We need a balance. In my view, the ranches contribute to that function of having a balanced civilization. I know that in England, preservation of nature and farming have long gone hand in hand. This isn't theoretical. There is evidence that it works. And it has been working here.

Because I believe that ranching enhances the value of PRNS and should continue in perpetuity, I'd like to see a plan that guaranteed the existence of ranches even if this meant giving leases to people not related to current leaseholders.

More immediately, I would like the Seashore to take immediate action to solve the negative impact of Elk on the ranches.

Thank you.

Murray Suid

Correspondence ID: 11 **Project:** 51867 **Document:** 62540
Outside Organization: Unaffiliated Individual
Affiliation:
Received: Nov,25,2014 09:32:42
Correspondence Type: Web Form
Correspondence: This is a test. This is only a test. - -Melanie Gunn

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Correspondence ID: 12 **Project:** 51867 **Document:** 62540
Outside Organization: People for a Golden Gate National Recreation Area Unaffiliated Individual
Affiliation: OffcialRep
Received: Nov,25,2014 11:48:06
Correspondence Type: Web Form
Correspondence: I participated only in the Tule Elk workshop for the RCMP. I thought it was well managed and permitted constructive dialogue. The November 2014 handout that someone also e-mailed me a few days before the workshop gave me lots of information.

I hope the RCMP will call for pasture and meadow improvements-- the removal of velvet grass and thistle for example-- and replacement of these plants that neither cows nor elk will eat with better forage. I hope this is studied thoroughly so that the preferred alternative will show what can be done and realistically financed. Water improvements should be considered as well.

I do not think the elk should be removed from the pastoral zone. But knowing how they have reproduced on Tomales Point, I think there should be consideration of establishing a cap on the population. That cap might be somewhat larger and smaller in consideration of weather conditions. Extended drought has made

the elk-cow conflict bad at this time. The elk could be less troublesome to the ranchers in wetter years, particularly if pastures and meadows are improved.

I think what is known about elk contraception now is unpromising. But I think NPS should commit to keeping up to date in the event there is improvement.

Hazing appears to be a successful technique in keeping the elk away from some pastures.

After consultation with the GGNRA-Point Reyes Advisory Commission some years ago, it was determined by the NPS that public hunting in the Seashore is a bad idea, in large part for safety reasons. I hope that question is not reopened. The removal of the axis and fallow deer was accomplished successfully by professionals. I think that is the best way to deal with overpopulation. Relocation outside of the park apparently requires more information than we have now.

The cows should be fenced in, not the elk. It apparently will require more fencing than is there now to be successful. High value pastures should be protected. Any fencing has to allow corridors of passage for the wild animals in the Seashore around the ranches. The elk should not be fenced into the wilderness area as has been suggested by some.

Correspondence ID: 13 **Project:** 51867 **Document:** 62540
Outside Organization: Unaffiliated Individual
Affiliation:
Received: Nov,25,2014 16:42:51
Correspondence Type: Web Form
Correspondence: I am dumbfounded at the turn that the management of Point Reyes National Seashore has taken! As I recall, a good many years ago the US Government bought out the cattle ranches that were located on the National Seashore property, giving the ranchers the privilege of continuing to inhabit the ranches during their lifetimes only. Now we are talking about who gets the ranches next, and by the way, how do we limit even further those publicly-stewarded elk that compete with the privately owned cattle?

This is nothing more than a violation of the public trust, yielding it to powerful, local, private interests. The basic premise of these meetings is that the continued presence of the cattle on this land is a done-deal; now we just need to work out the details that most favor their businesses. IT is NOT a done-deal.

I beseech you live to the mandate of your agency. Why are you favoring the ranch-holders? How about me, and the multitude of other members of the public?

Please enable this unique piece of land to be restored to its no-cattle splendor.

Correspondence ID: 14 **Project:** 51867 **Document:** 62540
Outside Organization: Unaffiliated Individual
Affiliation:
Received: Nov,25,2014 20:20:46
Correspondence Type: Web Form
Correspondence: Dear NPS,
Please avoid the problems you had with DBOC by not renewing the ranching leases. If you do renew the leases be very clear that the NPS's priority is the Elk and not the commercial ranches. The ranchers have been very clear, through their actions, that the Elk are not compatible with ranching, let alone row cropping. The pressures on ranching are only going to grow as the elk herd grows. 20 year leases is only

going exacerbate the problem. The ranches are only going to expand their footprint with commercial row cropping and expand the work force, along with the infrastructure to maintain it . Don't create the same problems you had with DBOC, don't renew the leases.

Correspondence ID: 15 **Project:** 51867 **Document:** 62540
Outside Organization: Spaletta Dairy C Ranch Unaffiliated Individual
Affiliation: Member
Received: Nov,26,2014 08:14:38
Correspondence Type: Web Form
Correspondence:
Dear Cicely Muldoon,

Our family have asked you with the last 24 remaining ranchers in the Seashore to please remove all Tule Elk off the Pastoral Zone and keep them off. These roaming elk are not compatible with our organic and grass fed business at Point Reyes. Most of these ranches to not have the resources (water and forage) for these roaming elk. There is 20,600 acres of wilderness designated for Tule elk in this Seashore. Cattle are to be kept on the Pastoral Zone intended for cattle grazing by law.
We have also enclosed our personal letter by mail.
There is a place for both elk and cattle in our beautiful Point Reyes National Seashore, not together.

Sincerely,
Nichola Spaletta
C Ranch

Correspondence ID: 16 **Project:** 51867 **Document:** 62540
Outside Organization: Unaffiliated Individual
Affiliation:
Received: Nov,26,2014 12:25:51
Correspondence Type: Web Form
Correspondence: I believe that the ranches are an important part of our history in Point Reyes. I ask the National Park Service to give better attention to the needs of ranch protection - including maintenance of the ranchers' properties, control of elk population, and building necessary fences that ranchers need to protect their organic feed and grazing for cattle. NPS must take into consideration the history of this community and the hard work of ranchers and jobs they provide for their employees. Consideration should also be given to the quality of farmworker housing and make improvements which in some cases is desperately needed.

Correspondence ID: 17 **Project:** 51867 **Document:** 62540
Outside Organization: Unaffiliated Individual
Affiliation:
Received: Nov,26,2014 12:30:42
Correspondence Type: Web Form
Correspondence: This letter is in regards to the Elk problem on our Ranches in the Point Reyes National Seashore.
I'm related to the Spalettas (C Ranch)and have attended workshops on this subject. I know first hand how my family is struggling with the Elk on their grazing land.
My suggestion is to move the Elk back to the Limantour Beach area with a fence built right along the rim of the ranches grazing fields.
Then the Park can manage Elk herds as they see fit, as they introduced the Elk in the first place.
There's plenty of land for cattle and Elk.
I know that the Park understands what a financial strain is put upon the ranchers because of the growing

Elk population.
Visitors can visit the Elk on their way to the beach and ranchers will have the stability and security of organic grazing fields as required by the State.
Win/win!

Michele Stone
Inverness, Ca

Correspondence ID: 18 **Project:** 51867 **Document:** 62540
Outside Organization: Committee for Clean Air and Open Space Unaffiliated Individual
Affiliation: OffcialRep
Received: Nov,26,2014 12:46:48
Correspondence Type: Web Form
Correspondence: Living downwind from the dairy ranches in PRNS is especially unpleasant when they broadcast their cows' feces. The smell can be so bad as to cause headaches and prevent me from going outside my house. I also think dairy ranching with its associated fecal contamination of fresh and saltwater, overgrazing, and land erosion are incompatible within a National Seashore. I strongly prefer that their leases not be renewed, and that native habitat, flora, and fauna are allowed to return to these areas, and that the areas become once again accessible to the public, in whose trust they are held.

Correspondence ID: 19 **Project:** 51867 **Document:** 62540
Outside Organization: Unaffiliated Individual
Affiliation:
Received: Nov,26,2014 13:28:53
Correspondence Type: Web Form
Correspondence: November 24, 2014

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

Re: Request for Further Comments on a Grazing Management Plan

Dear Superintendent Muldoon:

I am writing in response to your second request for comments on a grazing management plan for Point Reyes National Seashore (hereafter "the park") and, more specifically, the NPS document entitled "Ranch Comprehensive Management Plan Update November 2014" (hereafter "plan update") and its two associated workshops.

At the outset, it seems the workshops were a failure, at least to the extent the park was hoping to find consensus on any topics. There was no consensus on anything. On the other hand, maybe the park learned for the first time that park users don't like what the park plans to do to what is left of the coastal prairie.

The first workshop was the worst. There was not enough time to accomplish the tasks. The large flip chart pages that were taped to the walls for guidance in discussions were incomprehensible and only involved ways to increase pasture use and impacts; nothing to reduce them. Also, I heard several people say that the pro-ranching people in some of the twelve or so discussion groups took over the discussions and

wouldn't let those with opposite views speak or have their comments written down on that group's flip chart pages for later reading to the whole workshop. This might have been avoided, but your decision not to put a facilitator in each group created situations where what was written and reported to the entire group did not include the viewpoints of some participants. That taints the first workshop.

The second workshop was better because we didn't play musical chairs switching from group to group and the groups were given more time to discuss less topics. Still, like the first workshop where everything on the agenda focused on how to increase ranching beyond the status quo, the second workshop focused on getting rid of all the elk or just getting rid of some of the elk. There was no third option of keeping the status quo. Strangely, there was no information from the park on whether there was an overgrazing situation anywhere and, if so, what role elk played in any such overgrazing. Unlike the first workshop, those opposed to getting rid of the elk seemed to succeed in getting their beliefs heard and recorded. This was probably aided by the Park Service's contractor making clear at the outset of the second workshop that such tactics during the first workshop would not be tolerated during the second workshop.

As to the ranch plan update itself, my comments are as follows:

Statements on Page 1 of the Plan Update.

In paragraph 1 of the plan update there is the statement that this is "the first time in the Seashore's history that a plan for and about ranching has been undertaken." While obviously true, it is astounding that the park didn't start with a plan and NEPA document before the reservations of use and occupancy (RUOs) ended in the 1990s to determine what to do with those lands when those RUOs came to an end. Issuing all those leases and/or permits in the 1990s had significant impacts on the quality of the human environment and required an EIS, or at least an EA, covering the decision(s), but no such documents were done.

In paragraph 2 of page 1 it is stated that the park has had 50 meetings with ranchers. How many meeting did the park have with organization representing users of the park? I'm not aware of any. This shows a bias toward the ranchers.

In paragraph 3 of page 1 the plan update states that "two of the overarching objectives of this process are to enable the park to issue 20 year ranch permits and to devise an effective management strategy for tule elk affecting ranch lands." This is just one of many statements made by the Park Service that issuing 20-year leases or permits to the ranchers has already been decided. Similarly, a decision to get rid of some or all of the elk has already been decided. Those decisions required NEPA to be complied with beforehand and it wasn't. NEPA was violated when Secretary Salazar decided to give the ranchers 20-year permits and it continues to be violated.

In paragraph 4 of page 1 the statement is made that "[w]e believe the ranch plan is an exceptional opportunity to strengthen both the historic working ranchers and the superlative natural resources of [the park]." First of all, virtually every ranch and farm in the United States is as old as, if not older than, the ranches at the Seashore. More important, continuing ranching on 28,000 acres of the Seashore and GGNRA will not strengthen the natural resources of the seashore, it will weaken or harm the natural resources. Saying ranching will strengthen the park's natural resources is simply not true.

Statements on Page 2 of the Plan Update; Purpose and Need for Action.

Paragraph 1 (Purpose) repeats the fact that the decision has already been made to issue the leases.

Paragraphs 2 and 3 (Need), repeat the idea that ranching is an important contribution to the natural resources of the pastoral lands. The park is creating another credibility problem for itself (the first being

the oyster/harbor seal study). The only thing ranching does is to cause negative impacts to the natural resources. Both paragraphs also repeat the earlier statements that the Secretary already made the decision to issue leases for more ranching.

Statements on Page 3 of the Plan Update; Ranching Practices.

The third page addresses ranching practices and, more specifically, pasture management. All the various kinds of pasture management are beyond the status quo (with a few exceptions) and "intended to enhance the quality and quantity of forage on ranch lands." Ranching has already destroyed the native coastal prairie. The only action that should occur in the pastures is seeding to restore the coastal prairie and possibly controlled burns.

Statements on Page 4 of the Plan Update; Diversification.

All of this diversification is beyond what occurred on the ranches when the Park Service bought them and when Congress authorized the Secretary to issue leases for ranching in his "discretion" (and only where "appropriate"). All of it will increase ranching and harm natural resources.

Row Crops. Ranching should be limited to dairy cows and beef cattle. Row crops reduce habitat for wildlife. They will also cause conflicts between ranchers and wildlife (some birds and mammals will try to feed on the row crops), require more restrictive fencing that will make it more difficult (if not impossible) than it already is for wildlife to travel through the pastoral zone and the existence of those row crops will remove those areas as wildlife habitat, and they will require more water than now when there is already a shortage of water.

Other Livestock. Again, ranching should be limited to what was occurring when the land was bought by the Park Service and when Congress authorized the Secretary, in his discretion, to allow dairy and beef cattle ranching where appropriate. Furthermore, chickens, turkeys, ducks, geese, sheep, goats, rabbits and similar small animals are prey to many of the predators in the park. That will entail measures to protect the farm animals from predators. Woven wire fencing will harm wildlife by reducing habitat they depend on and by precluding necessary travel through the pastoral zone. Dogs will kill some predators. There will be pressure for the ranchers to take further action (legal or illegal) on their own even if it means killing predators. Authorizing anything that will harm wildlife would violate the Park Service's duty to protect wildlife.

Statements on Page 4 of the Plan Update; Succession.

The only thing the park should put in writing with respect to succession is that there is no right to succession. The Seashore Act provided for a preference for the former owner or tenant. It provides as follows: "Any land to be leased . . . 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 Untied States." 16 U.S.C. Â§ 459c-5(a). There is no right to special treatment for anyone else if the owner or tenant at the time of acquisition should die or leave. If the owner or tenant at the time of acquisition is no longer there, or is there but decides to leave, the Park Service should return the land to its natural condition. If the park should decide to offer such land for lease, it should do so at fair market value and it should condition the lease on appropriate terms and conditions that will protect the natural resources of the land to the extent possible just as it should do for all lands in the pastoral zone. Federal officials have an obligation to collect fair market value for use of federal assets.

Statements on Page 5 of the Plan Update; Tule Elk Workshop.

The plan update states that "the park has met multiple times with park ranchers and other stakeholders to solicit their feedback." Were any environmental organizations invited to discuss what to do with the elk?

Like the rest of the ranch plan, the elk section reads like the decision has already been made to get rid of all, or at least some, of the elk. There is no discussion of reducing ranching operations for the benefit of the elk.

It seems essential to have a detailed study of the carrying capacity of the land where the elk exist to even begin to consider what to do with the elk. Furthermore, elk are natural resources of the park and must be given preference over cattle if there is overgrazing. There is no discussion of whether the carrying capacity has been exceeded and, if so, what to do with cattle numbers.

In addition to my comments on the Plan Update, I have several comments on how this whole planning process is being handled by the park.

The park should stop this ranch management planning process and do an updated General Management Plan. Your planning statute requires that "[g]eneral management plans . . . shall be prepared and revised in a timely manner . . . [and] shall include, but not be limited to . . . measures for the preservation of the area's resources . . . . 16 U.S.C. Â§ 1a-7.

The park has only done one GMP and it is dated 1980. (Actually, there are two 1980 GMPs on your website and it isn't clear which is the GMP.) The park is way overdue on a revised GMP. Thirty four years and counting is not revising "in a timely manner." When someone at a recent Marin Conservation League meeting asked why the Ranch Plan was proceeding before a revised GMP, Superintendent Muldoon made reference to the old saying about "the cart before the horse." Even Dr. Laura Watt, a supporter of the ranchers, argues at the beginning of her scoping letter that the park should first address a revised GMP, not this ranch plan.

In addition to the planning problem above, Secretary Salazar violated NEPA when he made the decision to issue 20-year leases to the ranchers. The park has exacerbated his mistake by going forward. Going forward with this fatal flaw means that all the time and money spent from now on will have been wasted.

The park has a history of violating NEPA. This is the first time the park has done a NEPA document on the issuance of grazing authorizations (or even planning for ranching as the Plan Update admits). NEPA should have been followed when Superintendent Sansing issued authorizations to all the ranchers after their reservations of use and occupancy expired. I've heard he rationalized that on the basis that there was no change in use and therefore a categorical exclusion was adequate. That was wrong. The correct question then was whether issuing those authorizations would have any impact on the quality of the human environment. It would have and did have.

Aside from the above problems, doing an EA on this ranch is inadequate. It requires an EIS. The impact that 20 more years of ranching will have on the 18,000 acres of the park and the 10,000 additional acres across Highway 1 in the GGNRA will be significant. Ranching damages soil (compaction and erosion), vegetation (overgrazing and further loss of native vegetation), water resources (chiseling of stream banks, erosion, siltation, contamination by cattle urine and feces) and wildlife (competition for food, loss of habitat, injury and death due to fencing) in the park. Plus, every thing you add (pasture changes, diversification, getting rid of the elk etc.) to what the ranchers are already doing will add to the significance of the impacts. Getting rid of the elk will be significant in and of itself.

Based on the Organic Act and the park's enabling statute, the Park Service's overarching responsibility is to preserve and protect the natural resources of the park. There is no statutory right to ranching in the

park. The ranchers say they have a right to ranch based on the statute, but they don't. The only mention of ranching in the statute is that it can be allowed in the Secretary's "discretion." That's not language describing a right. It's just the opposite. The ranchers cite what they call "legislative history" to support their claim that the statute gives them rights. However, courts don't look at legislative history unless the statue is ambiguous. It isn't. Plus, even if there were an ambiguity, what the ranchers point to is not what a court would look at.

Finally, the Secretary's discretion is limited in that he or she can only allow ranching where "appropriate." If issuing a lease is inconsistent with preserving and protecting the natural resources of the park then issuance would not be "appropriate" and would violate the Organic Act and the park's enabling law.

My scoping letter is incorporated herein by reference.

Sincerely,

S/James Coda

James Coda

Correspondence ID: 20 **Project:** 51867 **Document:** 62540
Outside Organization: The Center for Biological Diversity Unaffiliated Individual
Affiliation: OffcialRep
Received: Nov,26,2014 14:33:54
Correspondence Type: Web Form
Correspondence: November 26, 2014

Cicely A. Muldoon, Superintendent
National Park Service
Point Reyes National Seashore
1 Bear Valley Road
Point Reyes Station, CA 94956

RE: Point Reyes National Seashore Ranch Comprehensive Management Plan/Environmental Assessment

SUBMITTED ONLINE AND BY MAIL POSTMARKED NOVEMBER 26, 2014.

Dear Superintendent Muldoon:

These comments are submitted on behalf of the Center for Biological Diversity (the "Center") regarding the proposed Point Reyes National Seashore ("PRNS" or the "Seashore") Ranch Comprehensive Management Plan ("CMP") and associated Environmental Assessment ("EA") scoping process.

The Center for Biological Diversity is a national, nonprofit organization with more than 800,000 members and activists dedicated to the protection of endangered species and wild places. Over 3,800 of our members and supporters reside in Marin County.

The National Park Service should prepare an environmental impact statement for the proposed CMP, not an environmental assessment.

The National Environmental Policy Act ("NEPA") requires federal agencies to prepare an environmental

impact statement ("EIS") for every major Federal action that significantly affects the human environment, which includes the natural and physical environment and the relationship of people with the environment. (42 U.S. Â§ 4332(2)(c); 40 C.F.R. Â§ 1508.14.) The proposed CMP would cover 28,000 acres of National Park land and will significantly affect how the millions of PRNS visitors use their National Seashore, and will also affect the Seashore's wildlife and wildlands including many species protected under the Endangered Species Act ("ESA").

PRNS is home to over 50 plants species currently listed by the federal government, state government, or the California Native Plant Society as being rare, threatened, or endangered and over 50 animal species that are listed by the state or federal government as threatened, rare, or endangered. (NPS 2014 Plants; NPS 2014 Animals.) The "pastoral zone" of PRNS is designated critical habitat for the California red-legged frog, western snowy plover, coho salmon, and steelhead. Given the extensive activities the proposed CMP contemplates through the proposed 20-year agricultural permits/leases, the current EA process is insufficient for addressing the significant impacts that the CMP will likely have on the listed species and their habitats. The NPS should prepare an EIS in accordance with NEPA in order to fully analyze and mitigate the negative effects that would result from implementing the proposed CMP on these listed and other protected species. While an EIS can follow an EA, it would be a poor use of resources to prepare an EA where there is no question that an EIS is required.

The preparation of an EIS at this stage will also assist in the coordination of NEPA and ESA Section 7 consultation with the U.S. Fish and Wildlife Service ("USFWS") and National Marine Fisheries Service ("NMFS") to address impacts on the numerous protected species found within the pastoral zone and in surrounding environments. While biological opinions were prepared by the USFWS in 2002 and NMFS in 2004 for a PRNS Grazing Permit Renewal Program, these opinions were for a different program than what NPS currently proposes. (USFWS 2002; NMFS 2004.) There have also been significant regulatory and land use changes at PRNS over the past decade that makes these opinions obsolete. For example, the old consultations did not address the impacts of the proposed "diversification" of agricultural activities beyond current uses and did not address impacts on steelhead critical habitat that was designated within PRNS in 2005. Both the USFWS and NMFS opinions instruct the NPS to initiate new consultations where circumstances have changed, as they have here.

Additionally, the NPS must prepare an EIS in order to serve its fundamental purpose 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." (16 U.S.C. Â§ 1.)

The proposed CMP needs to provide an option for the transfer of management of PRNS lands to NPS for conservation purposes.

The NPS' authority to manage the pastoral zone leases to the narrow terms of 25 years or a life estate. (16 U.S.C. Â§Â§ 1; 459(c)-5(a).) The terms of the leases have been met and currently the NPS continues to allow ranching (for beef and dairy) via short-term permits/leases. In its scoping literature and at public meeting, the NPS has now proposed a range of "succession" options by which ranching would continue at PRNS even if no one within the families of current ranchers desires to obtain a lease to ranch on PRNS land or if a family is otherwise unwilling or unable to meet permit/lease requirements.

Conspicuously absent from this proposal is an option to return such land to its natural state to be managed by the NPS for conservation purposes. This option is supported by the PRNSÊ¼ Enabling Act to preserve PRNS for "public recreation, benefit, and inspiration" and for the "public interest" (16 U.S.C. Â§ 459(c)), and for administration of the pastoral zone to be "consistent with, based upon, and supportive of the maximum protection, restoration, and preservation of the natural environment within the area." (16 U.S.C. Â§Â§ 1;

459(c)-6(a).) Administration of the pastoral zone must also comply with the conservation purpose of Section 1 of the Organic Act of the NPS(16 U.S.C. Â§Â§ 1; 459(c)-6(a)). The proposed CMP needs to include plans to return such land to NPS management for conservation purposes.

The proposed CMP should not contemplate options for "diversification" on PRNS.

The scoping documents propose the permitting of new kinds of livestock, row crops, dairy processing, hotel operations, and other commercial activities within PRNS. The proposed CMP should instead expressly disallow such "diversification." The new uses proposed in the scoping documents would expand the commercialized use of Seashore lands beyond what has been historically permitted. Such activities will result in many new and cumulative environmental impacts that the NPS has not addressed or even acknowledged in its publications on the proposed CMP or public meeting presentations. Additionally, lessees can only use and/or occupy these lands for the "sole purpose of noncommercial residential use and occupancy." (16 U.S.C. Â§ 459(c)-5(b).)

The proposed CMP should complement free-range management of tule elk throughout PRNS.

The Center does not support any of the options the scoping documents provide regarding tule elk management in PRNS. The long-range objectives for the NPS include making resource management decisions based on adequate scholarly and scientific information. (DOI 2004.) The NPS has not demonstrated scientific information providing that the options are appropriate or necessary for tule elk management in PRNS or within the pastoral zone.

To protect wildlife and other PRNS natural resources, cattle exclusion fencing should be required, but fencing that would harm or exclude tule elk and other wildlife should not be a part of the proposed CMP. The PRNS Tule elk are historically and ecologically important to the Seashore, and these native species should be allowed to access the entire PRNS and should not be subject to any actions that will harm or kill individuals or population groups.

The NPS has not engaged in a sufficient scoping process and instead has acted to favor public participation and input from a select group of stakeholders.

Former Secretary SalazarÊ¼s letter from November 29, 2012 letter simply directs the NPS to pursue a 20-year lease/permit extension and is not legally binding. (Secretary of the Interior 2012.) Indeed, the November 2014 CMP Update regarding the proposed CMP states that the Secretary's memorandum merely "demonstrates" the support of the NPS and the Department of the Interior for continued dairy and beef ranching operations within PRNS. (NPS 2014 Update.)

As described above, the NPS has proposed a range of "options" crafted through extensive meeting with ranchers (NPS 2014 Update) and has presented these as the only options in the NPS' publications and at public meeting. The NPS has not engaged other stakeholders in any sort of equivalent process and, as a result, the presented options do not reflect the concerns of other stakeholder groups, including those of the Center. In conducting an unbalanced scoping process the NPS had framed the current proposals as a "done deal" thereby wrongly foreclosing meaningful public participation.

Moving forward, the NPS should provide a genuine public participation process whereby the NPS proactively solicits meaningful contribution from the full range of stakeholders. This should result in a range of proposed options consistent with the statutory purposes of PRNS. Furthermore, the NPS must comply with NEPA and other federal law as it continues the CMP planning process.

PRNS is a national icon that is both ecologically diverse and fragile. The Center is extremely concerned about

the future of PRNS and the direction the NPS has taken in the scoping phase of the proposed CMP. The Center requests, on behalf of its members and the general public, that the NPS facilitate meetings with PRNS staff and conservation and community stakeholders to address the proposed CMP, as you have done over fifty times with the ranching community. (NPS 2014 Update.) Thank you for your attention on this matter, and feel free to contact us if you have any questions or concerns.

Sincerely,

April Rose Sommer
Staff Attorney, Urban Wildlands Program
The Center for Biological Diversity

Chelsea Tu
Staff Attorney, Urban Wildlands Program
The Center for Biological Diversity

REFERENCES

Department of the Interior, Department Manual, Part. 145, Ch. 1, Section 1.3 (Aug. 11, 2004). Available at: http://elips.doi.gov/ELIPS/DocView.aspx?id=687&dbid=0.
("DOI (2004").

National Marine Fisheries Services, [Biological Opinion Regarding the] Continued Issuance of Grazing Leases at Point Reyes National Seashore and the Golden Gate National Recreation Area in Marin County, California, (Apr. 5, 2004). Available at:
http://www.nps.gov/pore/parkmgmt/upload/noaa_biological_opinion_livestock_grazing_program_040405.pdf.
("NMFS (2004)").

National Park Service, Threatened, Rare, & Endangered Animals, (2014). Available at:
http://www.nps.gov/pore/naturescience/endangered_animals.htm
("NPS (2014) Animals").

National Park Service, Plants, (2014) Available at: http://www.nps.gov/pore/naturescience/plants.htm ("NPS (2014) Plants").

National Park Service, Ranch Comprehensive Management Plan Update November 2014, (2014). Available at: http://www.nps.gov/pore/parkmgmt/upload/planning_ranch_cmp_update_111417.pdf.
("NPS (2014) Update").

Secretary of the Interior, Letter from Secretary Ken Salazar to the Director of the National Park Service Regarding Point Reyes National Seashore-Drakes Bay Oyster Company, (Nov. 29, 2012). Available at:
http://www.doi.gov/news/pressreleases/loader.cfm?csModule=security/getfile&pageid=332286. ("Secretary of the Interior (2012)").

U.S. Fish and Wildlife Service, [Biological Opinion Regarding the] Formal Consultation on the Grazing Permit Renewal Program, Point Reyes National Seashore and the Golden Gate National Recreation Area, Marin County, California, (Received Sept. 27, 2002). Available at:

http://www.nps.gov/pore/parkmgmt/upload/usfws_biological_opinion_grazing_permit_renewal_020925.pdf. ("USFWS (2002)").

Correspondence ID: 21 **Project:** 51867 **Document:** 62540
Outside Organization: Unaffiliated Individual
Affiliation:
Received: Nov,26,2014 17:19:47
Correspondence Type: Web Form
Correspondence: WAKE UP.!!!! BOTH ELK AND RANCHING PROVIDE FOOD FOR THE HUMAN SPECIES. YOUR RULES AND REGS DO NOT
PROVIDE FOOD FOR US WHEN ALL DISTRIBUTION STOPS. !!!!!

BOTH SPECIES NEED TO BE PROTECTED AND IF NO, WHY SHOULD WE PROTECT YOUUUUU???

Correspondence ID: 22 **Project:** 51867 **Document:** 62540
Outside Organization: Unaffiliated Individual
Affiliation:
Received: Nov,26,2014 19:55:02
Correspondence Type: Web Form
Correspondence: Dear PRNS:

Below please find two links to papers that consider the effects of silage production and forage farming on birds. I referenced these links in the paper copy of my full comments that I submitted earlier today.

http://onlinelibrary.wiley.com/doi/10.1046/j.1523-1739.1994.08010147.x/abstract

http://www.jstor.org/discover/10.2307/3782254?uid=3739560&uid=2&uid=4&uid=3739256&sid=21104601900591

Thanks for your consideration,

Tom Baty

Correspondence ID: 23 **Project:** 51867 **Document:** 62540
Outside Organization: Unaffiliated Individual
Affiliation:
Received: Nov,26,2014 19:57:03
Correspondence Type: Web Form
Correspondence: Dear Superintendent Muldoon:

Thank you for the opportunity to comment on the NPS PORE Comprehensive Management Plan for Lands under Agricultural Lease/Permits Environmental Assessment. The Park Service is in such an interesting position in having to not only preserve and protect the natural environment of the Point Reyes Peninsula, but also the legislative mandate to preserve and protect the cultural resources of the area, i.e. ranching, as an ongoing and viable feature of the Park. In this light, the Park Service must achieve a very delicate balance between what some may think of as mutually exclusive or at least antagonistic goals.

The Ranches of the Point Reyes National Seashore must be preserved. Not only have they served as historically excellent stewards of the land, they also continue to provide the economic anchors to the remaining ranches of West Marin. Should the National Park Service allow the ranches to be eliminated

from the peninsula, the impact would have catastrophic effects on the economic viability of the remaing non-park ranches of West Marin. Preservation of ranching and agriculture has been the basis for Marin County's 40 years of planning and zoning that have maintained the open spaces and bucolic landscapes that not only enhance the edges and approach to the Point Reyes National Seashore, but also enrich the lives of those who visit and especially those of us lucky enough to live here.

I would like to see the NPS use this Management Plan to create new ways for the ranches to continue to exist and thrive within the Park. Working together, the Park could help the Ranches become showcases for environmental preservation that could be used as models for ranching throughout the nation. I urge the NPS, the Point Reyes National Seashore, and you, Superintendent Muldoon, to strive to finds ways of sustaining and improving the ranching activities within your care and protection.

Thank you.

William Barrett
Inverness, CA

Comments Received by Hard Copy Letter at the Park

NOV 25 2014

RECEIVED

2014 DEC -1 AM 7:44

POINT REYES NS

Point Reyes Ranch CMP/EA
Superintendent
Point Reyes National Seashore
1 Bear Valley Road,
Point Reyes Station, CA 94956

Dear Superintendent Muldoon

I have found that the entire process regarding the future of the lands of Point Reyes Nation Seashore to be severely skewed toward the Ranchers. I attended the meetings on November 20th and 21st. While everyone that I met with seemed like very likable decent people, concern for the preservation of the Natural Ecosystem of Point Reyes National Seashore seemed to have the lowest priority. Anything that would address these concerns were not to be discussed. Only how ranching could be guaranteed forever was on the table. The group I was in admitted that they do not now have such "Rights" and how to obtain them was the only reason for the workshop.

I feel that after all the extensions of the leases, it is time for the ranchers to turn over the land to the public which paid very handsome prices for the land back in the 1970s

Sincerely Ralph W. Adams III

[redacted]

Ralph W. Adams

[redacted]

OAKLAND CA 945

25 NOV 2014 PM 2 L

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

94956979999

Cicely Muldoon
Superintendent
Point Reyes National Seashore
Point Reyes CA 94956

RECEIVED
2014 DEC -1 AM 8:44
POINT REYES NS

November 26, 2014

RECEIVED
11/26/2014
13:00

Dear Cicely,

I would like to request that the comment period for the Ranch CMP be extended past the current November 26th deadline.

The workshop held on November 20 was a profound disappointment, primarily because the topics were framed in a completely ag-centric manner, where any and every possible expansion of economic (agricultural production and beyond) development was put forward. Except for some cursory comments in the opening remarks about finding a balance between agriculture and all the other park values, the set-up served to further polarize most of the debate. Many of those with concerns about the natural resources and environment were summarily forced into a defensive stance, where almost all responses to the wish-list of ranching activities were a negative.

There was no practical way to address all the potential ranching activities and operations at this meeting and the scope and impacts of these activities require more than a sound-bite in a "world café" forum.

In fairness, there should have been another workshop (which I am not advocating) to the effect of The Impacts of Agriculture on Natural and Recreational Resources, where there could be a complete "community conversation" about such topics as how silage production annually kills thousands of ground-nesting birds or the options and effects of predator controls when and if the Park opens the door to diversified livestock.

There continues to be a truly un-level playing field in this entire process. By its own accounting the park has met two and a half times more often with agricultural proponents than with other groups interested in how the Park handles this issue. While we were not denied access to Park planners and staff, it seems abundantly clear that the agriculture has had a larger voice in this discussion than those interested in protecting other Park values.

There is also a significant downside potential to how this process is unfolding: unduly high expectations by the seashore ranchers. Assuming that the Park fairly analyzes the impacts of much of the agricultural wish-list and determines that many are inappropriate for Point Reyes National Seashore, there could be considerable disappointment in the final CMPs. Expectations on all sides of the issues need to be kept in a realistic context.

Since the request for an extension on the comment period cannot be answered in the short timeframe, here is a jumble of comments generated from the "workshops:"

Profitability. If there is to be a metric for the viability of agriculture in the Seashore based on profitability, where there must be a much greater degree of transparency and accountability in the actual costs of operating in the Seashore. At an absolute minimum farmstead lease rates, grazing fees, and peripheral services (water, garbage, maintenance of access roads, etc) need to be posted in a readily available public format. An objective analysis of profitability would also mandate an open book policy on a rancher's operating financials. Agricultural proponents cannot sight economic stress when it suits their needs (such as negotiating a lease) while not providing a more complete context of the actual economics. These are still public lands held in public trust.

Viability. As stated in my original comments, the Seashore needs to formally acknowledge that at some point the economic viability of the ranches is beyond the control of Park policy and responsibility. While the Seashore should foster a reasonable climate for ranches to succeed, there are economic and natural forces that will eclipse what is practical for these lands and this park to support.

Retail sales and processing facilities. These have no place in the Park. The surrounding villages are choking with farm-to-table opportunities. The proposed LCP in front of the Coastal Commission seems that it will also increase processing facilities and retail outlets for farm (and probably other) goods. This really is development of our Seashore with a fresh coat of green-wash.

Weddings, special event venues, etc. These proposed uses are not in keeping with either the historic beef and dairy operations nor do they support the original purpose of the Seashore to keep a piece of our coastline in a relatively undeveloped state. I would imagine that none of the ranches have the infrastructure (septic capacity!, water supply, parking, etc.) to host ongoing events, nor should either the natural ecosystem or the visiting public have to endure activities that are essentially development without the benefits of a buildings or adequate septic systems.

Equestrian boarding facilities. Despite the historic linkage, horses currently remain outside of most definitions of agriculture (the production of food and fiber). One of the problems with equestrian facilities is that they tend to (and currently) create a new and more privileged class of park visitor. For example, equestrians are allowed to use ranch roads and farmsteads that are currently off-limits to others, as well as park and leave their trailers at these facilities. The park should consider grandfathering in existing equestrian operations, with the intent to not renew these permits beyond the current operators.

Pigs, goats, sheep, chickens, ducks, turkeys, rabbits, water buffaloes. The entire suite of diversified farm livestock seems like an overly ambitious list, given the park's limited resource management capacities and the current lack of enforcement

and monitoring in the agricultural realm. Pigs, for example, represent a huge management challenge. Pigs in the ranch cores create—sometimes acute---manure problems, particularly for the many ranches that were originally sited as dairies on stream courses. Pigs raised in pastures have lower concentrations of manure, but as omnivores are likely to consume protected species like red-legged frogs and others such as the eggs and chicks of many ground-nesting birds. The park needs to consider the issue of feral pigs and the likelihood that particularly the pasture raised hogs will escape and revert to a feral state. In the 1970s-80s the park and its open space neighbors had a hugely destructive and expensive feral pig problem.

Diversified livestock, particularly the smaller animals and particularly in pastures represent significant challenges as the Park needs to consider predator control options. Large hawks, eagles, bobcats, mountain lions and foxes and coyotes play a hugely significant role in our ecosystems and need to be allowed to co-exist in the pastoral zone. Lethal controls have no place in the Seashore. Non-lethal controls such as coyote dogs have their own drawbacks as they can and do significantly interfere with recreational access.

Silage, hayage, etc. Aside from the lethal effects on ground nesting birds and small mammals that I addressed in my original scoping comments, the production and fermentation of these materials also apparently creates a considerable contribution to greenhouse gases. The Park needs to evaluate the significance of these sources of greenhouse gases in the agricultural operations in the Seashore and whether a widespread practice is appropriate. One possibility to reduce silage/hayage production would be to limit it to the current dairy ranches that need their own feed for organic certification.

There are a couple of scientific papers on the detrimental effects of silage production on ground-nesting birds. Links to two of these articles will be submitted under separate cover.

Enforcement. Enforcement of what is permitted on Seashore ranches continues to be a significant problem. From over-sized herds, to clearly unpermitted species and activities, it seems that much of the enforcement in the pastoral zone seems to require a trigger of citizen complaint. The Seashore needs to do a much better job of enforcing its policies and permits. The CMP could facilitate enforcement by providing complete transparency in the leases and permits so it is clear to all what is allowed. Rather than having to engage Park staff in the initial conversation of what is permitted on a given ranch, accessible permits would greatly reduce these inquiries. Since all permits and documents are public and subject to FOIA requests, an open posting of these permits might also have the added benefit of reducing the extended backlog of FOIA requests in the Seashore.

Precedents. Both park staff and agricultural proponents repeatedly sight both 'historic" and currently precedents of agricultural operations in this and other National Park units as grounds for favoring and perhaps approving certain

agricultural activities. I think it is important to remember that history in Point Reyes did not simply begin 150 years ago. I also think it can be demonstrated that at one point or another every bad idea in the book has been permitted or tacitly allowed in one of the Parks. Current and "historic" activities should not be given a pass in the CMP analysis of impacts from agricultural activities. Depending on these analyses, some current activities should be either curtailed or grandfathered with a demonstrable end-date.

Context. Precedents in what is permitted in other National Parks are being cherry-picked. For example, the retail farm activities in Cuyahoga Valley are sighted as a precedent for farm stands in our Parks, yet this is taken out of context of the entire model of CVNP agricultural operations, with its non-profit foundation. Do any PRNS ranchers want to give 10% of their gross to an operating entity?

Advisory panel. Some agricultural proponents continue to call for an ag advisory panel for the Seashore ranches, made up of the very same ranchers and local "experts" in the field (UCCE, RCD, NRCS. etc.). This would be clearly wrong and illegal as it would exclude all non-ag voices from advising in the management of these public lands. If there were to be such an advisory panel, there would have to be an exactly even split of representation of between the proponents of agriculture, the conservation, and recreational interest. I am afraid that such an advisory group would be highly politicized and serve only to heighten the discord around agriculture in the Seashore. I believe that the Park has the capability to proficiently manage the pastoral zone in a manner that supports agriculture while not excluding other voices from the conversation.

Elk in the pastoral zone. It needs to be recognized that some of the current SUPs on ranching operations recognize that wildlife has a place in the pastoral zone. Even more to the point, under the Wildlife heading these permits specifically spell out that Park policy calls for the restoration of extirpated species and that leaseholders should expect this to be actively pursued on these lands.

An elk fence between the pastoral and wilderness zones. There needs to be a reality check on the notion that there can be a fence-line separating these areas of the Park. At the second workshop Park staff precisely laid out why cost, efficacy, and practicalities all make a single fence-line a non-starter. There are no easy answers for the elk issue; proposed answers that are unfounded in reality only make the process of finding solutions that much harder.

Sincerely,

Thomas G Baty

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POINT REYES NS

CENTER *for* BIOLOGICAL DIVERSITY

November 26, 2014

Cicely A. Muldoon, Superintendent
National Park Service
Point Reyes National Seashore
1 Bear Valley Road
Point Reyes Station, CA 94956

RE: Point Reyes National Seashore Ranch Comprehensive Management Plan/Environmental Assessment

SUBMITTED ONLINE AND BY MAIL POSTMARKED NOVEMBER 26, 2014.

Dear Superintendent Muldoon:

These comments are submitted on behalf of the Center for Biological Diversity (the "Center") regarding the proposed Point Reyes National Seashore ("PRNS" or the "Seashore") Ranch Comprehensive Management Plan ("CMP") and associated Environmental Assessment ("EA") scoping process.

The Center for Biological Diversity is a national, nonprofit organization with more than 800,000 members and activists dedicated to the protection of endangered species and wild places. Over 3,800 of our members and supporters reside in Marin County.

The National Park Service should prepare an environmental impact statement for the proposed CMP, not an environmental assessment.

The National Environmental Policy Act ("NEPA") requires federal agencies to prepare an environmental impact statement ("EIS") for every major Federal action that significantly affects the human environment, which includes the natural and physical environment and the relationship of people with the environment. (42 U.S. § 4332(2)(c); 40 C.F.R. § 1508.14.) The proposed CMP would cover 28,000 acres of National Park land and will significantly affect how the millions of PRNS visitors use their National Seashore, and will also affect the Seashore's wildlife and wildlands including many species protected under the Endangered Species Act ("ESA").

PRNS is home to over 50 plants species currently listed by the federal government, state government, or the California Native Plant Society as being rare, threatened, or endangered and over 50 animal species that are listed by the state or federal

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April Rose Sommer, Staff Attorney
351 California St. Ste 600 • San Francisco, CA 94104 • 415-436-9682 x315 • Fax: 415-436-9683 • asommer@biologicaldiversity.org

government as threatened, rare, or endangered. (NPS 2014 Plants; NPS 2014 Animals.) The "pastoral zone" of PRNS is designated critical habitat for the California red-legged frog, western snowy plover, coho salmon, and steelhead. Given the extensive activities the proposed CMP contemplates through the proposed 20-year agricultural permits/leases, the current EA process is insufficient for addressing the significant impacts that the CMP will likely have on the listed species and their habitats. The NPS should prepare an EIS in accordance with NEPA in order to fully analyze and mitigate the negative effects that would result from implementing the proposed CMP on these listed and other protected species. While an EIS can follow an EA, it would be a poor use of resources to prepare an EA where there is no question that an EIS is required.

The preparation of an EIS at this stage will also assist in the coordination of NEPA and ESA Section 7 consultation with the U.S. Fish and Wildlife Service ("USFWS") and National Marine Fisheries Service ("NMFS") to address impacts on the numerous protected species found within the pastoral zone and in surrounding environments. While biological opinions were prepared by the USFWS in 2002 and NMFS in 2004 for a PRNS Grazing Permit Renewal Program, these opinions were for a different program than what NPS currently proposes. (USFWS 2002; NMFS 2004.) There have also been significant regulatory and land use changes at PRNS over the past decade that makes these opinions obsolete. For example, the old consultations did not address the impacts of the proposed "diversification" of agricultural activities beyond current uses and did not address impacts on steelhead critical habitat that was designated within PRNS in 2005. Both the USFWS and NMFS opinions instruct the NPS to initiate new consultations where circumstances have changed, as they have here.

Additionally, the NPS must prepare an EIS in order to serve its fundamental purpose 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*." (16 U.S.C. § 1.)

The proposed CMP needs to provide an option for the transfer of management of PRNS lands to NPS for conservation purposes.

The NPS' authority to manage the pastoral zone leases to the narrow terms of 25 years or a life estate. (16 U.S.C. §§ 1; 459(c)-5(a).) The terms of the leases have been met and currently the NPS continues to allow ranching (for beef and dairy) via short-term permits/leases. In its scoping literature and at public meeting, the NPS has now proposed a range of "succession" options by which ranching would continue at PRNS even if no one within the families of current ranchers desires to obtain a lease to ranch on PRNS land or if a family is otherwise unwilling or unable to meet permit/lease requirements.

Conspicuously absent from this proposal is an option to return such land to its natural state to be managed by the NPS for conservation purposes. This option is supported by the PRNS' Enabling Act to preserve PRNS for "public recreation, benefit,

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and inspiration" and for the "public interest" (16 U.S.C. § 459(c)), and for administration of the pastoral zone to be "consistent with, based upon, and supportive of the maximum protection, restoration, and preservation of the natural environment within the area." (16 U.S.C. §§ 1; 459(c)-6(a).) Administration of the pastoral zone must also comply with the conservation purpose of Section 1 of the Organic Act of the NPS(16 U.S.C. §§ 1; 459(c)-6(a)). The proposed CMP needs to include plans to return such land to NPS management for conservation purposes.

The proposed CMP should not contemplate options for "diversification" on PRNS.

The scoping documents propose the permitting of new kinds of livestock, row crops, dairy processing, hotel operations, and other commercial activities within PRNS. The proposed CMP should instead expressly disallow such "diversification." The new uses proposed in the scoping documents would expand the commercialized use of Seashore lands beyond what has been historically permitted. Such activities will result in many new and cumulative environmental impacts that the NPS has not addressed or even acknowledged in its publications on the proposed CMP or public meeting presentations. Additionally, lessees can only use and/or occupy these lands for the "sole purpose of noncommercial residential use and occupancy." (16 U.S.C. § 459(c)-5(b).)

The proposed CMP should complement free-range management of tule elk throughout PRNS.

The Center does not support any of the options the scoping documents provide regarding tule elk management in PRNS. The long-range objectives for the NPS include making resource management decisions based on adequate scholarly and scientific information. (DOI 2004.) The NPS has not demonstrated scientific information providing that the options are appropriate or necessary for tule elk management in PRNS or within the pastoral zone.

To protect wildlife and other PRNS natural resources, cattle exclusion fencing should be required, but fencing that would harm or exclude tule elk and other wildlife should not be a part of the proposed CMP. The PRNS Tule elk are historically and ecologically important to the Seashore, and these native species should be allowed to access the entire PRNS and should not be subject to any actions that will harm or kill individuals or population groups.

The NPS has not engaged in a sufficient scoping process and instead has acted to favor public participation and input from a select group of stakeholders.

Former Secretary Salazar's letter from November 29, 2012 letter simply directs the NPS to pursue a 20-year lease/permit extension and is not legally binding. (Secretary of the Interior 2012.) Indeed, the November 2014 CMP Update regarding the proposed CMP states that the Secretary's memorandum merely "demonstrates" the support of the

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April Rose Sommer, Staff Attorney
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NPS and the Department of the Interior for continued dairy and beef ranching operations within PRNS. (NPS 2014 Update.)

As described above, the NPS has proposed a range of "options" crafted through extensive meeting with ranchers (NPS 2014 Update) and has presented these as the only options in the NPS' publications and at public meeting. The NPS has not engaged other stakeholders in any sort of equivalent process and, as a result, the presented options do not reflect the concerns of other stakeholder groups, including those of the Center. In conducting an unbalanced scoping process the NPS had framed the current proposals as a "done deal" thereby wrongly foreclosing meaningful public participation.

Moving forward, the NPS should provide a genuine public participation process whereby the NPS proactively solicits meaningful contribution from the full range of stakeholders. This should result in a range of proposed options consistent with the statutory purposes of PRNS. Furthermore, the NPS must comply with NEPA and other federal law as it continues the CMP planning process.

PRNS is a national icon that is both ecologically diverse and fragile. The Center is extremely concerned about the future of PRNS and the direction the NPS has taken in the scoping phase of the proposed CMP. The Center requests, on behalf of its members and the general public, that the NPS facilitate meetings with PRNS staff and conservation and community stakeholders to address the proposed CMP, as you have done over fifty times with the ranching community. (NPS 2014 Update.) Thank you for your attention on this matter, and feel free to contact us if you have any questions or concerns.

Sincerely,

April Rose Sommer
Staff Attorney, Urban Wildlands Program

Chelsea Tu
Staff Attorney, Urban Wildlands Program

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April Rose Sommer, Staff Attorney
351 California St. Ste 600 • San Francisco, CA 94104 • 415-436-9682 x315 • Fax: 415-436-9683 • asommer@biologicaldiversity.org

REFERENCES

Department of the Interior, *Department Manual*, Part. 145, Ch. 1, Section 1.3 (Aug. 11, 2004). *Available at:* http://elips.doi.gov/ELIPS/DocView.aspx?id=687&dbid=0. ("DOI (2004").

National Marine Fisheries Services, [*Biological Opinion Regarding the*] *Continued Issuance of Grazing Leases at Point Reyes National Seashore and the Golden Gate National Recreation Area in Marin County, California,* (Apr. 5, 2004). *Available at:* http://www.nps.gov/pore/parkmgmt/upload/noaa_biological_opinion_livestock_grazing_program_040405.pdf. ("NMFS (2004)").

National Park Service, *Threatened, Rare, & Endangered Animals,* (2014). *Available at*: http://www.nps.gov/pore/naturescience/endangered_animals.htm ("NPS (2014) Animals").

National Park Service, *Plants,* (2014) *Available at*: http://www.nps.gov/pore/naturescience/plants.htm ("NPS (2014) Plants").

National Park Service, *Ranch Comprehensive Management Plan Update November 2014,* (2014). *Available at*: http://www.nps.gov/pore/parkmgmt/upload/planning_ranch_cmp_update_111417.pdf. ("NPS (2014) Update").

Secretary of the Interior, *Letter from Secretary Ken Salazar to the Director of the National Park Service Regarding Point Reyes National Seashore-Drakes Bay Oyster Company,* (Nov. 29, 2012). *Available at*: http://www.doi.gov/news/pressreleases/loader.cfm?csModule=security/getfile&pageid=332286. ("Secretary of the Interior (2012)").

U.S. Fish and Wildlife Service, *[Biological Opinion Regarding the] Formal Consultation on the Grazing Permit Renewal Program, Point Reyes National Seashore and the Golden Gate National Recreation Area, Marin County, California,* (Received Sept. 27, 2002). *Available at*: http://www.nps.gov/pore/parkmgmt/upload/usfws_biological_opinion_grazing_permit_renewal_020925.pdf. ("USFWS (2002)").

April Rose Sommer, Staff Attorney
351 California St. Ste 600 • San Francisco, CA 94104 • 415-436-9682 x315 • Fax: 415-436-9683 • asommer@biologicaldiversity.org

Chelsea Tu
Center for Biological Diversity
351 California St., Ste. 600
San Francisco, CA 94104

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Cicely A. Muldoon, Superintendent
National Park Service
Point Reyes National Seashore
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Point Reyes Station, CA 94956

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2014 NOV 26 AM 11:38
POINT REYES NS

TO THE NATIONAL PARK SERVICE: 11/25/14

FROM WHAT I HAVE SEEN WHILE WALKING THRU THE PARK AND READING ABOUT OTHER PRACTISES OTHER THAN RANCHING IN THE PARK IT IS APPARENT TO ME THAT ROW CROPS HAVE CREATED A HUGE AMOUNT OF EROSION IN THE ESTERO AND IN THE STREAMS LEADING INTO DRAKES ESTERO AS WELL AS INTO THE OCEAN. IT SHOULD NOT BE CONSIDERED SOMETHING WE WANT TO REPEAT IN OUR BEAUTIFUL PARK. IT IS FAR TO DESTRUCTIVE AND WE DON'T WANT TO REPEAT THE MISTAKES OF THE PAST.

ON A DIFFERENT TOPIC THE IDEA OF FARMSTANDS ON THE POINT AT EACH RANCH OR EVEN ONE COMBINED FARMSTAND AND INFORMATION BOOTH IS NOT A GOOD IDEA BECAUSE OF CRAZED TOURISTS DOING NUTTY STUFF LIKE PARKING ON THE ROADWAY

CREATING HUGE BACK-UPS ON SIR FRANCISE DRAKE ROAD MUCH LIKE WE'VE WITNESSED AT TOMALES BAY OYSTER CO. ON HIWAY ONE. CAN YOU IMAGINE THAT, WHAT A NIGHTMARE!

ALSO I BELIEVE THE RANCHES ARE BEING OVER GRAZED AS WITNESSED BY MYSELF AND OTHERS OF CREEKS RUNNING GREEN DURING BIG RAIN EVENTS AND GREEN FOAM ON POINT REYES BEACH AND FOAMY GREEN SURF DURING STORMS. LETS MANAGE THE NUMBER OF CATTLE ON EACH RANCH MORE CAREFULLY AND SPREAD THE MANURE AROUND FROM FEEDING AREAS SO IT ISEN'T SO CONSENTRATED IN ANY ONE AREA.

THANK YOU FOR YOUR ATTENTION TO THESE MATTERS.

YOUR PARK LOVING FRIEND,

[redacted]

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2014 NOV 26 AM 11:39

POINT REYES NS

11/25/14

TO THE NATIONAL PARK SERVICE:

I REALIZE THAT THE TULE ELK IS A DIFFICULT ISSUE ESPCIALLY AFTER BEING SOROUNDED BY MY NEIBORING RANCHERS AT THE DANCE PALACE GATHERING AND HEARING MUCH ABOUT THEIR PROBLEMS WITH THE TULE ELK.

PERSONALLY I LOVE THE ELK. I WANT TO SEE THEM RUN WILD FROM PEIRCE POINT TO BOLINAS TO MILL VALLEY TO FAIRFAX ETC. BUT I REALIZE THATS NOT REALISTIC BUT BEING FREE TO ROAM PT REYES NATIONAL PARK WITH EXPENSIVE EIGHT FOOT FENCING TO PROTECT RANCHES AND THE PUBLIC IS POSSIBLE WITH ENOUPH FUNDING COMING FROM OTHER PARKS? FROM GOVERNMENT FUNDING OF SOME KIND? TO FENCE OFF THE RANCHES ALONG THEIR BOUNDRY LINES AND HWAY ONE AND THE VILLAGES IMPACTED BY THE ELK IS

THE ONLY WAY WE CAN GET EVERYONE TO AGREE THAT THE ELK ARE LOVABLE AND WE NEED THEM TO BALANCE THE ENVIREMENT OF OUR WILD PLACES HERE IN WESTMARIN.

CAN WE TRAIN THEM TO EAT ALL THOSE HORRIBLE INVASIVES LIKE THEY SUP-POSEDLY CAN DO WITH GOATS? CAN YOU IMAGINE ELK EATING BROOM, THOUROUGH SP WART, CALENDULA, STAR AND BULLTHISTLE, EVEN POISON HEMLOCK. LORDY, WOULD THAT BE SOMETHING. ANYWAY, YOU GET MY DRIFT, I LOVE THE ELK AND HOPE TO SEE THEM ON THE LOOSE FOREVER MORE.

YOUR LOVER OF NATIONAL PARKS BROTHER,

WALTER HOFFMAN
BOLINAS

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POINT REYES NS

POINT REYES RANCH CMP/EA
SUPERINTENDENT
POINT REYES NATIONAL SEASHORE
1 BEAR VALLEY ROAD
POINT REYES STATION, CA. 94956

From:
Bruce Keegan
[redacted]

November 22, 2014

Below are my responses to the workshops held at The Dance Palace, Pt. Reyes Station on November 21, and 22, 2014.

PASTURE MANAGEMENT:

Soil Preparation:

*Tilling for prairie restoration only.
*Disking and seeding for native perennial grasses and.

Seeding:

*Only native grasses and forbs should be seeded.
*No silage seeding should be allowed because of negative impacts during harvesting on ground nesting birds and because this further introduces exotic grasses to the national seashore.

Nutrient Management:

*Manure should be trucked out of the Seashore.
*Spreading increase the risk of introducing pathogens into the soil, specifically, **Johne's Disease spores.**
*No fertilizers should be used within the park.

Harvest Mowing:

*Should be prohibited to protect ground nesting birds.

Fencing:

*Wildlife friendly fencing and electric fencing should be used in place of barbed wire which should be removed throughout the park.
*Range rotation should not include elk exclusion.
*No row crops, sheep, pigs or any other livestock or animals not already there should be Introduced.

DIVERSIFICATION:

***Absolutely not!!**

MODIFICATION TO RANCH INFRASTRUCTURE:

*No additional ranch construction should be permitted.

SUCCESSION:

*Upon permit expiration, the ranch lands should be returned to the park for prairie restoration.

*No passing on the right to extend permits to heirs of the original leaseholders.

*Upon termination of a permit, if a ranching family can show undue hardship as a result of this action, **he should be compensated for his loss favorable to the party involved.**

*Organizations like the Trust for Public lands should be allowed to buy out permits from willing sellers.

THE TULE ELK WORKSHOP:

"D" Ranch should be returned to wilderness in it's entirely: 1,192 Acres. No livestock grazing there at all.

MANAGEMENT ALTERNATIVES:

Elk should be allowed to go wherever they want. They are a rare grassland animal inside of a national park!

In the event that conservationists who want prairie restoration at Point Reyes are successful, the elk can be expected to come within the carrying capacity of the range.

Cheap grazing fees and free housing is more than enough compensation to permit holders within the seashore. Most of the annual fees are less than the cost of renting a 2 bedroom apartment in San Francisco.

Contraception may be an option if the elk herds threaten the health of the prairie.

Johnes disease:

*Johne's is a disease of confinement!

*Two Thirds of the nation's dairy herds are infected!

*None of the other Tule Elk herds in the State of California are infected with Johne's!

*Soils into which Johne's spoors have been shed will be free of the disease within a year if not re-infected.

*Some of the elk and deer within the seashore have been in contact with dairy operations which may explain why certain animals have been infected including the exotic Fallow and Axis Deer.

LETHAL REMOVAL:

No lethal removal!
As soon as elk are shot the public will no longer be able to view them.

[redacted]

Bruce Keegan

Point Reyes Ranch CMP/EA
Superintendent Cicely Muldoon
Point Reyes National Seashore
1 Bear Valley Road,
Point Reyes Station, CA 94956
25 November 2014

NOV 25 2014

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Dear Superintendent Muldoon,

Thank you for the opportunity to submit comments on the Ranch CMP/EA after the November Workshops. I am a member of Western Watersheds Project, which works to protect and restore western watersheds and wildlife through education, public policy initiatives and litigation.

I have found that the entire process concerning the future management of lands at Point Reyes National Seashore to be pre-decided. Every aspect of your process so far is skewed toward facilitation of private livestock operations with no other alternative considered, despite the fact that those operations are inherently problematic to the primary purpose of this National Seashore, ie. to be administered in a manner consistent with "maximum protection, restoration and preservation of the natural environment within the area". There are massive soil, water, vegetation and pollution problems in the pastoral zone at PRNS, yet the obvious alternative to phase out the nonnative livestock is never included in your alternatives or discussion topics. This excludes the public.

Please provide a summary of the November Workshops. The public has a right to know how the input that the Park Service solicited is categorized.

I attended both of the November Workshops, which asked the participants to decide among choices that assumed that production of livestock would continue. There was really no place for our opinion, and when we asked her, the facilitator was puzzled as to how to include us. It is disheartening to have our NPS choose cattle over native tule elk, dismissing the purpose and need of this coastal park. Tule elk should be allowed to use all the National Seashore. Whoever heard of wildlife being fenced in a national park?

If it has not done so already, the NPS needs to determine carrying capacity of tule elk at PRNS, which is necessary to manage elk populations over the long term, especially to justify sterilizing, hazing, and killing them. Please provide this calculation to the public.

The point of the workshops is not clear to me, other than to lock in ranching in PRNS forever. (The ranchers admitted that they want the current privilege to ranch to become a right.) Everyone was very nice, we liked each other, but how is that relevant to the administration of the park "without impairment of natural values"? (Section 459c-6) Those engaged in an agricultural business must maximize the extraction of natural resources in order to make a living. A national seashore has an opposite goal in focusing

on guarding the natural environment and keeping it healthy. These are incompatible uses, no matter how much mitigation is discussed and attempted. Every nonnative animal and plant reduces habitat for native flora and fauna through alteration of soil, water, plants and animals. If tule elk were allowed to be free and unrestricted within the park, native predators such as grizzly bears could be re-introduced. Grizzly bears were exterminated from Point Reyes within historic times (see Storer and Tevis, *The California Grizzly*). They would provide natural control services for the elk as well as be a top draw for visitors.

Thousands of Scoping Comments were submitted last summer, yet the NPS has produced no practical sign that those Comments have any consideration in NPRS decision-making. PRNS appears to have ignored the majority of those 3000+ Scoping Comments which show the public wants the ranches to be gone. Despite a clear interest and intention on the part of the public to have this alternative at least discussed, we have yet to hear of a single public meeting that represents the non-ranching interests. The fact is that the public comes to PRNS to see tule elk and other wildlife, to hike or go to the lighthouse or the beach. No one comes to see cows, which can be seen all over Marin and Sonoma counties as well as the rest of California, the U.S and the world.

Please explain the cost of the November Workshops and other meetings the NPS has sponsored for the public to discuss the Ranch CMP. Who paid for these and how much was paid?

Please schedule some workshops for those members of the public who want to see alternatives to maintaining a pastoral zone and would like to talk about restoration of native habitat there.

You said at the Workshop that you are relying on the Secretary of Interior's statement about continuing ranching with 20-year leases, but this decision cannot stand without compliance of a full NEPA analysis that includes an EIS.

Sincerely, [redacted]

Karen Klitz

p.s. I tried to submit online at 1pm and 4pm yesterday but after 10 minutes got a message "Bad Request". So as per Melanie Gunn's email suggestion am using the postal service today. Thanks!

Adams & Klitz
[redacted]

OAKLAND CA 945

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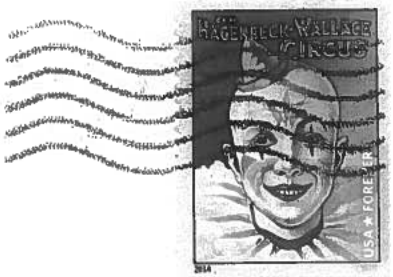

Superintendent
PRNS
1 Bear Valley Road
Point Reyes Station, CA 94956

Point Reyes Ranch CMP/EA

94956979999

Comments on the National Park Service document regarding the Pt. Reyes National Seashore:

Ranch Comprehensive Management Plan Update, November 2014.

NOV 25 2014

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POINT REYES NS

William Klitz, Ph.D.
Visiting Scholar
Integrative Biology
University of California
Berkeley, CA 94720-3140

(member of Western Watersheds Project)

The Pt. Reyes National Seashore Administrators have somehow convinced themselves that a predetermined stance speaking to the needs of the Pt. Reyes ranchers is best, while ignoring the many other stakeholders now living through the continued misuse and ongoing destruction of this precious and unique natural resource. A much stronger, more forthright and genuinely content laden workshop exercise would have focused on the phase-out of ranching altogether at Pt. Reyes, rather than present a bureaucratic format that only looks at the extension of ranching leases and expansion of ranching activities for another couple of decades.

What motivates this carefully tailored support for one select group of US ranchers? Why don't all US ranchers get this level of hand holding? Would it have been more efficient to have the local Agricultural Extension conduct this exercise?

You mention "all park dairies are now organic", but what of all other ranching operations? How can you sanction any pesticide and herbicide applications on this National Seashore?

I believe that the Diversification section rises above the inherent misdirection of others in its promotion of a whole range of additional land use activities, so far from those supposedly innocent and 'historic' dairy operations. You seem to have already convinced yourselves (following years of phrase and language refinement) that the commercial ranch operations on Pt. Reyes are a special and integral part of the value of the PRNS. The phase out of ranching altogether is the important question being ignored. A contrasting determination would show that the NPS is complicit in an orchestrated deception that ignores a clear expectation evident at the PRNS creation: that ranching would be phased out.

For a moment consider the often spoken phrase "Historic Ranches" when referring to those agricultural activities on the property Seashore itself. The proposed and currently practiced activities referred to—the original dairy and all of the more recent beef (Stockers), commercial fowl, pigs, sheep, goats etc.—are nothing more than efforts to create more income for the individual operations. This intention is fine and appropriate on the 1,000s of other commercial ranch and ag operations present in California alone. How can it be justified to carry on this way in a precious natural resource? The founding of ranching in the 1860s on Pt Reyes was a culminating step in the European takeover of western North America—

similar fill-in ranch creations, aimed at European takeover and utilization of every suitable habitat, came into being across the America West in those few decades around 1860, now only 150 years past. So, we can say, historic for whom—the endangered flora and fauna, the Native Peoples?

The "Succession" section, I at first thought might be referring to ecological succession, piqued my interest. Instead I see that you meant ownership handover of holdings, to make sure that the "Ranching Now, Ranching Forever" process is maintained. Where is the elimination of ranching and the return to coastal prairie option, as at the very least is implied in the Seashore's creation back in the 1970s?

Why does the Tule Elk Workshop section not mention the status of Tule Elk, an endangered California native, and their population bottleneck within the last century down to a handful of individuals? What fraction of that possible genetic variation of the species is currently present in the Pt. Reyes elk? How can these animals, even in a context of legitimate population management considerations, be cast as a pest and irritant for the ranchers' sake?

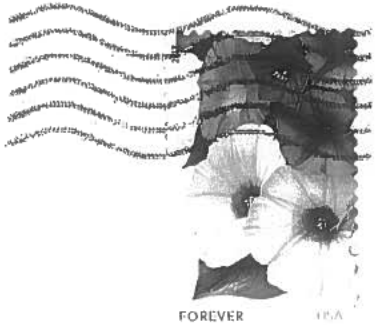
I would like to see some documentation of Johne's disease, its biology, hosts and nature, not just a crude raising of the infectious disease specter. You seem to admit that evidence of this condition in the Pt. Reyes herd could not be found. Are the cattle themselves carriers? What animals are potential carriers? Any discussion of Pt. Reyes Elk should be devoted to the status and numbers of Tule Elk across California, long term goals of population re-establishment in new areas, genetic diversity in existing populations and the potential of introducing natural predators in order to regulate Elk numbers.

If you want to give this workshop and any recommendations coming out of it some real force and legitimacy, an Environmental Impact Report is essential. This Report must include variation in activities among the ranches, as inter-ranch practices appear to be a major component of variable impact on the National Seashore. This could help create an evidence base required for any decisions that could possibly be relatively free of political winds.

The National Park Service carries with it a charge to defend the precious natural areas that it oversees. I hope this is not lost in the Pt. Reyes National Seashore Administration.

OAKLAND CA 945

25 NOV 2014 PM 3 L



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

94956979999

11-26-14

RECEIVED

2014 NOV 26 AM 11:01

POINT REYES NS

Point Reyes National Seashore (PORE)
Ranch CMP

As of 2014, the California Tule elk population numbered more than 4000 animals at 22 locations. One of these locations is at Point Reyes National Seashore (PRNS) pastoral zone. Within the Park, there is a free-ranging population and a fenced population.

Conflicts between cattle and elk have arisen over damaged fences and over grazing the available pasturelands. The free-ranging population is growing and becoming a problem for the ranchers.

At the recent PRNS workshop 11/21/14, several management techniques were presented for consideration: fencing; contraception;"lethal removal"(culling) or trans-location.

There is another possible choice that includes fencing and that is producing elk for the restaurant trade and regular consumers. This is being done successfully in Canada. The meat would be organic, range-free, local and locally processed. There are fewer beef operations in the Park's pastoral zone now than in the past. These historic ranches could be offered first to the Park's beef producers to raise market elk.

The elk could still be viewed by visitors at the Tomales herd. In the Cevennes National Park (Lozere, France), regular field trips are conducted in the Fall to hear the elk bugling during the rut. This could be done at PRNS also. The Cevenne National Park, like PRNS has working ranches within the park and elk were also reintroduced with much controversy. Perhaps we could benefit from their experiences . The Sr. Biologist is monsieur Jean Kermabon based at Park headquarters, Florac, France. The Cevenne, like PRNS, is part of a UNESCO Biosphere Reserve; we should have a natural, professional relationship with them through the Biosphere programs. You can find him on the internet (he speaks English).

Please give these suggestions serious consideration.

Respectfully submitted,

[redacted]

Beverly Childs McIntosh
Public Agency Environmental Planner, retired

RECEIVED
2014 NOV 24 PM 3:47
POINT REYES NS

Comments on Ranch Comprehensive Management Plan Nov. 2014

My wife and I wish to submit the following "comments" for elk management:

Statement of principle: Tule elk on Point Reyes National Seashore pastoral zone should be managed such that their population is consistent with their forage supply (=sustainable), and that no harmful effects on ranchers' activities be caused by elk that may move onto active ranches. (It's meaningless to say at this point that elk should not have been moved out of the fenced area of Pierce Point).

We have reviewed theTule Elk Management Techniques listed in the papers(Ranch CMP Update, November 2014) handed out for the two community workshops, Nov. 20 and 21, 2014. Nowhere are relative costs listed for different management techniques, either done by ranchers or park service. There could be wide variations in anticipated costs. If fencing is deemed effective, who pays for this? The park service released the elk; we would expect the park service to pay. Are there limits in financing as to what the park service can provide? Helicopter round up with nets sounds very expensive, then what?

We would like to propose a solution for management:
Build a big corral with wings into which a group of elk are herded. Population structure goals would dictate which animals are to be culled. The culled animals would go to market similar to the process that livestock from the ranches are taken to market. Not many people should protest this type of removal. When exotic deer were shot in the past to reduce populations, it became quite controversial. We know people which to this day don't "forgive" the park service for killing Bambi(s).
Problems in corralling the elk? Could they be herded by people and/or machines? We don't know how effective this could be. Bull elk with seasonal antlers could be a problem, so corral them after they have dropped their antlers.

We've heard of another possible solution to damage caused to ranchers' pastures: compensate the ranchers for excessive damage. Could fair assessment of damage be done, and an effective method of payment be set up? Would ranchers be "open" to this proposal? But this doesn't solve the expected population growth of the tule elk.

Thank you for the opportunity to participate in this important management plan. We have lived in the Inverness Park area since 1978, and have been involved with the park and many of its activities. We wish the park well in successfully completing the Ranch CMP, with broad community support; we don't want to see another oyster farm- type issue consume our community.

Sincerely,
Russell Ridge (retired, biology professor, College of Marin)
[redacted]
Margaret Ridge (retired teacher and social worker)

RECEIVED
2014 NOV 25 PM 12: 39

Spaletta Dairy
[redacted]YES NS

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

November 23, 2014

Regarding: Public Comment Ranch Comprehensive Management Plan ending 11/26/14

Dear Cicely,
Thank you for letting us comment once again regarding ranching in the Point Reyes National Seashore. Our family asks that all Tule elk on the Pastoral Zone be removed as soon as possible and kept off the Pastoral Zone intended for cattle grazing. It is clear that these elk are incompatible with our dairy cows in our pastures. We are not happy with the Tule elk being hazed through our fences. Our family thinks the Tule elk would be much happier if they were kept in their designated wilderness area and not bothered. A wildlife friendly fence needs to be erected along the Pastoral Zone/Wilderness area border. If elk or cattle are outside their designated area, they should be place back immediately. The 18,000 acre Wilderness area needs to provide enough water and forage for the number of elk in that area to keep them healthy. These practices should be the same at the 2,600 acre Tomales Point elk preserve. There should be no exceptions.

We have included our February letter sent to you as a reminder of the serious impacts the elk are causing us daily. Now the number is 95 elk in the Drakes Beach area. The elk rut is over and elk will calve again this coming spring bringing these numbers even higher.
Our family also has included important sections from your 1998 Point Reyes National Seashore Tule Elk Management Plan and Environmental Assessment. These important sections helped us believe that ranchers would be protected by wondering problem animals. Also outlined in your Point Reyes National Seashore 2001 Year in Review, problem elk were not to interfere with cattle ranches within the park.
You did not discuss, or include Tule elk impacts to ranching operations at your Tule Elk workshop or in your Ranch Comprehensive Management Plan Update-November 2014 for the public.

Ranch operators have reported a number of impacts and concerns to their operations associated with Tule elk including:

Loss of forage due to direct consumption by elk.

Inability to rest pastures and allow forage to grow to maximum levels.

Damage to fences and other infrastructure.

Difficulty keeping cattle in desired pastures due to fence damage.

Concerns that organic standards may not be met due to loss of available forage to elk.

Consumption of water for livestock.

Concerns of disease transmission from elk to cattle, specifically Johne's disease.

The public needs to be educated about the 24 ranching families left in the Point Reyes National Seashore and Golden Gate National Recreation Area. These working historic ranches are a very important part of West Marin and the food chain in northern California and beyond. We look forward to a solution to have both elk and cattle remain in the Seashore for the public to view in their designated areas. We hope this can happen soon, so the elk and ranchers can get back to their regular routines with out further conflict.

Let us continue to work together to preserve our historic working ranches and our incredible natural resources for future generations to enjoy.

Sincerely,

The Spaletta Family C Ranch

[redacted]

Spaletta Dairy

[redacted]

Cicely Muldoon, Superintendent
Point Reyes National Seashore
One Bear Valley Road
Point Reyes Station, California 94956

February 24, 2014

Dear Cicely,
Thank you for coming out Friday to our ranch for a visit. Our family knows how extremely busy you are and are very appreciative of your time with us.
The Spaletta family would like to continue to work with you on a solution regarding the free range elk on the Pastoral Zone affecting our historic dairy operation. We are not sure if we can wait for two to three more years for you and the NPS to decide to continue to force the ranchers in the Point Reyes National Seashore to have to co-exist with roaming elk on their leased pastures intended for cattle grazing at a cost to the ranchers.
We have been in touch with you and your staff since your first visit with us that included elk impacts back on 10/28/10. We presented to you our personal letter explaining the damages and costs of what the free range elk were doing to our agriculture operation daily. Our hay was quoted at $ 150.00 @ ton in 2010; it is now $ 370.00 @ ton and climbing. Our grains and pasture management have gone up as well. At that time, we had 40 elk on our pastures. Now, we have over 70 elk and the population is still growing. Our leased/permitted ranches for grazing do not have enough forage and water for both our cattle and elk for us to continue our organic certification into the future if something is not done to remove the elk permanently.
We have tried to work with the PRNS staff since 2008 on a solution to protect our dairy operation from elk damage. We continue to notify you and your staff by phone, email and letters of elk damages and impacts as you have asked us to do. Your solution for our dairy operation regarding elk impacts so far is to chase elk through our fences off our pastures. You got to see the damage first hand Friday when you took a ride in our pastures and took pictures. It is very hard for the Spaletta family to try to continue ranching practices with all the damage that the elk create. Both you and your staff state that the chasing/hazing solution is not working. That is true, because we still have elk almost daily on our pastures that we manage for our organic dairy cattle.
We ask along with ranchers in the Seashore that the elk in the Drakes Beach and Home Ranch areas be placed back in their designated 18,000 acres of wilderness in Limantour that was provided for these elk in 1998. This will protect the working historic ranching families in the Seashore for future generations.

Sincerely,
Ernie, Nichola and Ernest Jr. Spaletta

[redacted]

1998 Point Reyes National Seashore Tule Elk Management Plan and Environmental Assessment

Adjacent Landowners
The park service has a responsibility to be a good neighbor to adjacent and nearby landowners. Anticipating the effect of the Elk management strategies on the property or perceptions of neighbors is an important consideration. Any depredations by elk on fences, crops, or other property would require mitigation actions to correct or avoid problems.
Page 13

Ranches may close operations overtime due to economic reasons, the discretion of the lease, or the direction of the National Park Service. If and when ranches close, fencing and other restrictions could be removed, but this plan makes no effort to hasten this change.
Page 15

Under alternative A, the Seashore will maintain the elk fence on Tomales Point and continue to separate Tule elk from cattle.
Page 44

The area chosen for the Limantour herd has characteristics that will encourage free ranging elk to establish and maintain home ranges within the Seashore. These characteristics include large acreage in Natural Zones with buffers from major highways, ranches, and lands outside the Seashore.
Page 47 Page 48 (Map)

Tule elk will be allowed to roam outside the area as long as new home ranges are not established where conflicts with traffic corridors or neighbors are likely.
Page 46

The seashore proposes to capture and move any animals that cross Olema Creek along Highway 1. Captured animals will be tagged; radio collared and returned to designated Tule elk ranges within the Seashore.
Page 47

Damage to property could occur if elk move outside the Seashore onto private lands and consume crops or damage fences or other property. The Seashore will be ready to recapture or destroy problem animals should these situations arise, or establish partnerships with state, county agencies with necessary skills and personal to assist with the recapture. The Seashore should be prepared to provide funding for compensating property damage if necessary. It may be possible for the Seashore to modify parts of the habitat to help prevent such occurrences or construct barriers to dispersal.
Page 49

Flipchart Comments Received at the Workshops

FLIP CHART COMMENTS FROM THE NOVEMBER 20TH PUBLIC WORKSHOP – RANCHING PRACTICES

Pasture Management #1

- Difference between ranching and natural resource management:
  - Monoculture versus more diversity of habitat; not mutually exclusive
  - Mow to remove thistle, radish
  - Herbicides not favored – used only one time on ice plant but issue near organic farms
  - All methods benefit ranching rather than natural resources
  - Elk are doing well at PP – vegetation is in good shape
  - Fences help separate ranches and elk – discussed options
  - Wildlife harmed by fences
  - Restore coastal prairie
  - Spraying doesn't work for organics
  - Grazing is good for native vegetation – reduces competition
- Pros/ cons of electric fences – not a problem if using plastic handle
- Importance of overall goal of planning: food production (sustainable) and maximum natural resource protection
- Predators: coyotes and mountain lions
- Compare health of land inside and outside of elk zone
- Baseline of disturbance is greater in ranch zone than totally natural N.P.

Pasture Management #2

- If discing is allowed?
  - What is the impact?
- What are the best management practices to promote natural resources?
- Important to hear from the ranchers; what their challenges are
- *Using a CAT to remove Tule Grass on an individual basis
- What are the goals of the ranchers and natural resources?
- Balance of ranch practices with natural landscape

Pasture Management #3

- Best ways to implement:
  - Factors:
    - Scale
    - Available resources
    - Conservation and wildlife-friendly
- Report Out:
  1. Goal: Model ranches/ education
  2. Method: Committee to guide implementation
  3. Leadership: Community collaboration to be the best

Pasture Management #4

- Where is the baseline for pasture management? How can you have one set of rules for the different ranches?
- Mob grazing
- Streamline and flexibility for weed removal/ pasture growth
- Challenges: Tule Grass and Coyote Brush
  - Current practices don't work
- Report Out:
  - Three Main Topics/ Info:
    - Flexibility
    - Hearing from the ranchers directly on the challenges
    - Balance of Ag operation: economic viability/ feasibility and protecting natural resources

Pasture Management #5

- Education and management: focus on benefits/ impacts of grazing as a tool to encourage biodiversity; native species, invasive control
- Encourage rotational grazing, support fencing practices, <u>alternative water sources</u>
  - Developing springs for better pasture management
- Examine the status of the rules on herbicides for invasive control
  - How to integrate rancher effort with NPS efforts
- Develop finer grained scientific basis for brush management
  - How do we balance the needs to control invasive grasses with nesting
- Electric fencing is a decent option in some cases for wildlife
- Biggest issue: elk breaking fences
- <u>Develop consistent policies/ answers</u>

Pasture Management #6

- #3
  - Thistle management
  - Succession: input by current lessee
  - Diversification
- #3
  - Brush control by park
    - Landing becoming unusable
- #2
  - Fencing: quality, electric, vulnerability
    - Cattle "push-over" factor
- #1
  - Ranchers are good people, caring for this place

Pasture Management #7

- Compare ranching and natural resources
  - Profitable ranches are well-managed

    - Brush and weeds management, use different practices
    - Brush and weed management benefit both the ranch and the park
    - Controlled burns to help with brush and weeds
- Farm and placement of permanent pasture to control brush and weeds
    - With unpredictable weather, let ranchers control their farm lands and adapt to conditions
    - Creating and diversifying for water storage with climate change
- Working together with park service to decide the best ways to implement these practices
- Creating more water sources
    - Create less impact on natural resources
    - Keeping cattle out by creating water sources away from the streams
- Need good fence
    - Sometimes wildlife friendly fences won't keep cattle in!
    - Sucker rod fencing lifetime fence for road access
- Report Out:
    1. Brush and weed control will be more profitable for ranch and natural resources
        - Permanent pasture
    2. Water resources
        - Creating new by stock ponds or increasing current ponds
        - Benefits livestock and wildlife
    3. Right fence for the right job

Pasture Management #8

- What is the role of no till practices and need for them; carbon storage and nutrient retention [as BMP]
- What are BMPs with respect to native plant species?
    - These are beneficial for maintaining a diverse insect community
- How/ can practices encourage native grasses?
    - Slower to establish and expensive, which requires long fallow times and rotation issues
- One of the main considerations for machinery is erosion control, not size
- "Drilling is the best way, period!"
- Liquid versus solid manure management is a matter of timing; can management change to reduce carbon emissions?
- BMP: rotational grazing/ electric fencing; CO2 emissions?

Pasture Management #9

- Dairies require organic
- Need access to all available tools to maximize pasture
- Preserve tools available now to all ranches not unintended consequences of process
- Expanded ability to grow silage environmental impacts great
- Native grasses replanted wherever possible/ not real
- Flexibility
- Forage – healthy pastures

- The current system
- No till/ seeding but need options – discing 3-5 years periodic
- Electric fences effective and inflict least amount of harm
- Embrace making carbon project protocols for seashore range cawds
- Moving around herd
- Allow sale of forage within park
- *Grazing by cows is supportive of pasture health and range land

Pasture Management #10

- Ranching depends on healthy grasslands – to benefit resources and industry
  - Not contribute to erosion slopes
  - Tilling? Not with native grasses
  - Number of grazing animals – not too many but enough
  - Weed management – Rye and clover
- Site and context-specific
  - Healthy soil; fewer weeds and better pasture
  - Pasture rotation
  - Good management; better yield
  - Carbon sequestration is a win-win practice
  - No tilling practice
  - Clearing land to produce good pasture – remove brush – for no tilling
- Size of pasture needs to be determined for each ranch and production capacity

Succession #1

- If the family is no longer interested, then what?
  - Ranchers choice; a neighbor or family member; ranchers know who are good stewards
  - Ranchers would like input on who gets it
  - No ranchers beyond the park because the park families know the land and practices
  - How does the park decide who gets it if many are interested?
    - Do not open up to bidding
    - All interested must submit a RFP; RFPs go through a review process by a committee of park and other Agricultural agencies
  - Don't close a ranch just because the family lost interest; keep it in Ag.
  - Also access the productivity of said ranch
  - Is the whole ranch still productive? Perhaps some sections are not productive anymore.
  - Keep the good productive land in Ag
  - Other models?
    - RFPs and grading proposals based on BMP and Ranch plans
    - Advisory groups rank proposals
      - Advisory group consists of NRCS, FSA, Maria Co. Ag. Commissioner
  - **No auctions**

- Leases
  - Stability is necessary
  - Ranchers need time to renegotiate their lease
  - When the next generation takes over a lease, it should "reset the clock" and that generation gets to have the 20 years start over – rather than pick up where the older generation left off
- Report Out
  1. Continue the same way it's been done – let the ranchers have input on who the next lessee of their ranch is
  2. If no one is interested, come up with an Advisory Committee consisting of the Park, NRCS, Ag. Commission, FSA, etc. that ranks RFPs that interested ranchers would have to submit
  3. When the next generation takes over a lease, the 20 year clock should be "reset"; they get to have 20 years rather than finish out what preview generations had left

  DO NOT OPEN UP TO PUBLIC BIDDING PROCESS

Succession #2

- Maintaining the integrity of the "neighboring" ranches
- Keeping it in the family
- Restoring vacant homes/ buildings and the pasture land
- Family consideration/ recommendations for who takes over
- Continuous active management of land/buildings
- Streamline the process

Succession #3

- Balance through family
- Is the park committed to Ag?
- Need written plan
- Open up to family, or, if not, open it up so that land doesn't go fallow
  - Park decisions
    - Good stewardship should be a factor, not how well a rancher gets along with the park
    - Consider employees
    - Is the park under any obligation to continue a ranch if the family gives it up?
    - Park should continue ranching on abandoned ranch
    - Park should have the discretion for pasture leases – protect wildlife
- Existing park process is good-memoralize
  - Park needs flexibility
- Need guidelines
  - Need to get family members on the lease

Succession #4

- What would be an appropriate process to choose the next lessee?
  - Are options on the list a priority-based list?
    - Yes; ranchers answered survey
  - Or is there no option to return land to wilderness on the table

    - Family
    - Neighbors within seashore
    - Ranchers within seashore
    - Original leases/ permits only allowed family succession
    - But need balance between farmland and wilderness
    - Some pastoral land includes wilderness protection
    - Organic farming attempts to create a balanced solution?
    - Succession by outside interest may risk practices out of balance

Succession #5

- Clear criteria for good ranching practices if good ranching practices are part of succession determination
    - Including fair worker wage and housing considerations
- We support longer leases; allow better investment in conservation practices and worker housing and loans
    - Longer lease = 20 years: will help with securing funds for upgrades, including housing and loans
- Families, ranchers in park as successors; no outsider bidding

Succession #6

- Open out bid to those based on best management practices OR
- Revert to the park when lease ends to prairie restoration, i.e. no succession
- If succession (as per #1) open to:
    - Existing ranching families in park through bidding process given priority
    - Bidding not based on money but on conservation/ farming practices
- Ag continues in park

Diversification #1

- We're split
    - Some say no diversification
    - Others say yes to low impact diversification – well-managed – core areas
- Three Points
    1. Need process and a pre-approved list to support permitting
    2. Understand the priorities of ranchers
    3. Site/ farm specific

Diversification #2

- How many ranchers are interested in diversification now/ in the future
- Spreading risk
- The option or opportunity to grow multiple things depending on markets
- Flexibility for ranchers; short time frames/ timely manner
- Time: where and how much
- Camping?

- Hands need to be untied for ranchers
- Pre-approved list of what you can and can't do
- Answers from park in timely fashion
- Multiple income streams can keep you going during down markets
- Better park capacity to handle ranch issues
- Report Out:
    1. Flexibility for ranchers/ short time frames/ timely manner/ untie hands
    2. Multiple income streams can keep you going during down markets
    3. Pre-approved list of what you can and can't do

Diversification #3

- Diversification is key to viability, how to balance while protecting park values and resources
- Farm stays, education okay
- Other animals such as chicken and pigs are a concern
- Manage scale/ balance with resource needs/ impacts
- Accountability to ensure balance between diversification and resources
- Organic and value added, e.g. cheese quality, modest scale on cheese and butter farm value added important

Diversification #4

- Meaning
    - Diversification may be okay but must preserve park values
    - Should not go to kitchens; maybe farm stands
- Why do we need diversification?
    - Adding complementary agricultural uses
    - Consistent with history of agriculture in the area
    - Supports local food supply and diminishes other environmental impacts (e.g. transportation/ shipping)
- Some forms of diversification trigger management practices that have their own impacts (e.g. fencing)
- Economic viability relates to keeping families on the farm
- Primary purpose of a national park is to protect resources
    - Agriculture is incompatible
    - Impact of traffic from farm stays versus visitors – millions

Diversification #5

- Best ways to implement, extensiveness
    - Depends on what the diversification is
    - Each ranch is different
    - Equal opportunity to do the same things
    - Need for longer leases in order to invest in certain projects
    - The importance of scale and operation

    - Would like to see the park have a quicker response and more collaboration with other Ag agencies
    - Need more clear guidelines regarding diversification
- Identify best practices for diversification beyond "the core"
- Look outside of this area to learn how others have implemented these practices
- Report Out:
    1. Diversification, flexibility, options open, and opportunities to educate
    2. Balance of opportunity and protecting park resources to diversify
    3. Clear guidelines and a timely process for those wanting to diversify

Diversification #6

- Diversification is:
    - Flexibility to try something different
    - Keeping options open for the future; for example, processing and row crops
    - Being able to keep up with the times and do a variety of things
    - Education is something that can be done without interfering with the operations
    - Supports entrepreneurial efforts and supports ranchers starting new businesses while protecting wildlife
    - Balance needs of wildlife with new opportunities
    - Wants this process to make it easier for ranchers to thrive and survive; ranchers are good examples of sustainability
    - Education is a key component
- Opportunities/ activities
    - On-farm processing
    - Free-range poultry
    - Row crops
    - Flexibility to go with the times
    - Education
    - Farm-stays

Diversification #7

- What is diversification?
    - Goal is: viability, improve habitat, encourage succession, public education (organic/ BMPs)
- We realize the park will set standards/ fit within laws and regulations
    - Look to history/ be flexible
- Diversification management strategy
    - Committee of park personnel, RCD, ranchers, Ag extension

Diversification #8

- A variety of definitions and practices
- Row crops limited by water availability or lack of availability
- Native plant restoration procedures
- Fencing: wildlife, livestock, electric

- Report Out:
  1. Agreement on limited diversification centered at ranch core
  2. A variety of opinions on how to implement diversification outside core
  3. Agreement on limiting new construction and on repurposing existing structures for diversification

FLIP CHART COMMENTS FROM THE NOVEMBER 21ST PUBLIC WORKSHOP – TULE ELK MANAGEMENT

Discussion Group #1

- No Elk
  - Fencing-No elk in park
    - Two kinds of fences
      - Keep elk out
      - Keep cows in
- Managed Herd
  - Use all tools available
  - Contraceptives
    - Further study needed
  - Buy out Neiman(?)
  - Buy out Home Ranch
    - Further study needed
  - Doing nothing is NOT an option

Discussion Group #2

- Do elk need to be everywhere?
- Utilize all tools
- Fencing unattractive
- Convert home ranch to prairie; move elk there
- Some management is required
- Park makes commitment to preserve Ag. PORE
- Restore land to original prairie land
- Will elk approach towns and urban centers?
- Customized solutions per unique area
- One-size fits all not doable
- Hazing, blended solution
- Elk in wilderness, fence them in
- More data on elk impact, rancher compensation
- Organic require - grazing on wild grass
- Cost to raise cows is - in or out of park
- If park ranches go away, creates more pressure
- Can we find a number of cows and a number of elk that can co-exist in the spaces in question

Discussion Group #3

- Elk habitat management/ improvement in wilderness is critical for either approach
- No Elk
  - Single fence from ranches preferred because it is viewed as viable

    - Public viewing and experiencing can happen on Pierce Point and Limantour
    - Fencing out ranches means fencing every ranch; not feasible
    - Other options are hard on animals
    - If some elk get out, have options to move them to Pierce Point
- Elk in Pastoral Zone
    - Concern that there may not be long-term commitment to manage elk (cost, staff turnover)
    - Elk in pastoral zone impact Ag. Operations (cow fences knocked down, loss forage)
- Report Out:
    - No Elk
        - Single fence
        - Move elk to wilderness
        - Manage for elk and habitat in wilderness
        - Public viewing opportunities (Pierce Point and Limantour)
    - Elk in Pastoral Zone
        - Concern that there may not be long-term commitment to managing elk (costs, staff turnover)
        - Elk have priority over grazing livestock (minority report)

Discussion Group #4

- No Elk in Pastoral Zone
    - Park should handle all the fencing to keep them out of the ranches in pastoral zone
    - Elk are hard on fences; takes up time to fix fences
    - Park (professionals take care of the elk)
    - Local officials take up funding
    - Move elk out of pastoral zone and fix fences not around every ranch (cheaper)
    - Can’t let fields rest because elk move on when cattle are off
    - Elk eat ranchers’ hay (expensive)
    - Overgrazing of pasture
    - How grass removes brush plant for elk
    - Hazing “C” ranch doesn’t work
        - Elk go in circles and break the fence
    - Elk are more destructive to pasture; dig up pastures
    - Bull elk spear cows with thorns
    - Bull hit cow; aborted pregnant cow
    - Don’t cull the entire herd like fallow deer
    - Immediate actions herd growing
    - Elk at point interbred at Pierce Point
    - The “C” ranch herd was 3, now 93
    - Immediate action to cull by lethal
    - Contraception will take more time for park service
        - Too difficult to manage
    - Trophy elk - $ towards management

    - Ranchers get one hunting tag a year
    - Donate meat to charity
    - Free-range organic elk
    - Move herd from "C" ranch to Limantour
    - Quarantine elk to get permission to move them
    - Move elk to an area of wilderness where there are no cattle
    - Has anyone requested "stocker elk"?
    - Easier to move after they shed their antlers
    - Ranchers have volunteered their trailers
    - Park doesn't have the resources to manage the elk
    - Park has taken so long; park should give special status
    - Ranchers don't have a year especially with drought
    - Organic ranchers 30% __ is pasture 120 day fed hay 2 months earlier
        - Overgrazed, looking at pastures (certifier) drought and elk
    - Economic benefits
        - Subsidy for drought
        - Economic offset for ranchers to remain viable
        - Why they are dealing with the elk
    - How should the park support the ranchers
        - Organic certification
    - Emergency culling program to reduce the impact of the elk on the pasture
        - Lobby Feds and State for money to sustain the ranchers for elk emergency
        - Also lobby the national organic standards for short-term waivers releasing the ranchers for short-term grazing requirements
- Immediate action to remove elk from pastoral zone [no elk]
    - Lethal, culling, removal to another area, hunting
    - Trophy to raise money for management
    - Fence to keep elk out of pastoral zone
    - Managing pasture
- Manage a smaller, healthier herd
    - Funding for the ranchers/ farmers
        - Fencing/ feed
    - NOP Standards – RDM Requirements
        - Feasibility/ sustainability of farm/ ranch
        - Park does not have the resources to manage the organic free-range elk

Discussion Group #5

- No Elk in Pastoral Zone
    - Immediate and long-term: Fence between pastoral and Limantour wilderness and move herd
        - Advantage of preventing elk - contamination
    - Immediate as needed: Manage elk population by selling hunts
    - Immediate and long-term: Make work on Limantour area grazing and enhancements

    - Eliminate population by managed hunts
    - All suggestions offered not acceptable
- Do nothing about elk in pastoral zone:
    - At risk, narrow gene pool: endangered species – less than 4,000 in existence
    - Allow natural population development
    - Continue testing for Johne's disease in elk and cows to allow for transfer
    - Ranches are a cultural resource that will be endangered if nothing is done
- Managed Elk in Pastoral Zone
    - Contraception
    - Managed hunts – Native Americans using traditional methods
    - Relocation
    - Fencing – selective fencing of specific ecological areas
    - Enhancement in wilderness area
    - Predators – wolves, black bears
    - Monitor herd and reimburse ranchers for damage

Discussion Group #6

- Report Out:
    - No Elk in pastoral zone
        - Fence
        - Managed hunts
        - Grazing enhancements in Limantour wilderness
        - Some people do not agree with any of the above
        - Some know elk are endangered and some know that ranches are endangered
    - Managed Elk in Pastoral Zone
        - Contraception
        - Relocation
        - Monitoring herds
        - Some don't agree with the above

Discussion Group #7

- There is no "magic answer"
- Important to improve the habitat outside of the Pastoral Zone
- All the tools should be available and prioritized within the management plan; some tools may be more short-term while some are long-term
- You need to deal with the current issue; how to get to none or some, and then how do you manage none or some long-term
- There should be a recognized baseline/ goal for herd management so that decisions can be made from that

Discussion Group #8

- Management of Elk in Pastoral Zone
    - Fencing in valued pastures, barn areas, etc.

- How do you determine the right size of the herd and how to sustain it?
- If elk remain in pastoral zone will need an aggressive array of tools in order to manage it – hazing, culling, etc.
- How do you sustain funding to continue perpetual management of the herd?
- There should be absolutely no contraception used; it is too disruptive to the animals
- More investment and management of long-term habitat enhancement, like what has been done at D Ranch
- What is the best way to manage size?
  - Culling
- If a rancher is being asked to have a managed herd on their ranch, then constant management needs to happen and rancher should be compensated in some way; monetarily or with extra pasture
- Culling is a humane way of managing herd size
- No matter what action is chosen, there needs to be a concrete elk management plan put into place
  - We need to think about the long-term
- If there are going to be fences on ranches to exclude elk, where would they be located? Amount of acres? What would it look like?
- Park needs to work with and assist ranchers with rangeland enhancement
- Establish a "friends of" group to help fund whatever scenario is chosen
- Need some sort of replacement for the elks' natural predators

- No Elk in Pastoral Zone
  - It is important for us to see a map of the pastoral zone so we know what area we are working with
  - Need clarification if the elk have ever gotten around the Tomales Point fence
    - Yes they do and they are hazed back
    - It happens every couple of weeks – one or two
    - The rancher calls the park and they are moved back
  - Why are the elk a problem for the ranchers?
    - Fence damage
    - Forage consumption; drought or no drought
  - Ranchers fear if they agree to some elk in exchange for park assistance for maintaining fences and replacing forage that if they come upon a year with a tight budget and the park cannot do those things
  - Need a better understanding of the elk baseline in the wilderness and how to manage it to maintain it
  - What was the impact on forage from non-native deer?
    - There was, but a lot of ranchers did not complain
    - Non-natives were removed before many of the dairies converted to organic
- Tools for Removal
  - No black helicopters for contraception
  - Need fencing – either exclusion or on the pastoral zone boundary
  - Fencing them out of certain areas is okay – fencing in wild animals is not

- Use culling as a management tool but not as the top tool
- Relocation is an option
- If it comes down to culling versus relocation – relocate outside the park
- Need to address and understand the carrying capacity

Discussion Group #9

- No Elk
  - Transport to the wilderness, or out of PRNS
  - Continue water and forage enhancement in the wilderness
  - Wildlife/ livestock fencing projects and maintenance will be required, but may not be practical
  - Culling of problem elk
- Managed
  - Cattle have always been fenced in the pastoral zone; may not be practical or possible for the elk
  - Continue water and forage improvement throughout pastoral/ wilderness areas
  - Each ranch is unique and has different requirements

Discussion Group #10

- No Elk in Pastoral Zone
  - Compete for herd
  - Disease?
  - Knock down fences – need to be 8 – 10 feet high
  - Spallettas – 600 acres and 100 elk?
  - Fence off areas at Limantour to contain elk
    - Needs to be maintained, i.e. Arizona and highways/ elk crossings
  - Keep ranches and elk separated
    - Sport license on ranches to cull elk
      - Manage hunts
  - Contraception – doesn't work?
  - Diversify: Switch from cows to elk – farming for local consumption
  - Not possible to keep them out of pastoral zone
  - Ranching and National Park are not compatible
- Manage elk in pasture zone
  - Manage hunt to control
    - Fence – cost – who pays?
    - Culling/ hunt – multiplying at 12.5%/ year?
      - Not commercial – not selling license or consider money from license to go to habitat enhancement projects
      - Let ranchers have certain number of permits
  - Contraception – is it effective? How about castration?

    - Habitat enhancement – attract elk away from ranches
    - Ranching and National Park are not compatible

Discussion Group #11

- No elk in the Pastoral Zone
    - Fencing elk out of Pastoral Zone
        - Long-term
    - Direct population management
        - Lethal removal based on established population size
        - Citizens' advisory committee working with the NPS
        - Implementation timeline
            - Shore-term and long-term
        - Professional/ academic input, government input for long-term
        - Suitable population size
    - Rapid response to elk getting through fence
        - Habitat enhancement outside of pastoral zone (long-term)

Discussion Group #12

- No Elk
    - Park staff should embrace and work with Agriculture to maintain the sustainability as outlined with the legislation
    - Build fence
        - Maintain from pastoral zone and manage fence
    - Manage wilderness
        - Habitat enhancement
        - Keep population in balance
    - Cull elk herd
        - Hunt
- Manage Elk
    - No viable option based on experience to data
        - Use legislation
    - Elk in Wilderness Roaming Free, Control off Pastoral Zone and Highway by Fencing
    - Define allowed uses in pastoral zone and wilderness zones
    - Manage wildlife in pastoral zone so that it doesn't harm Ag producers
    - Continue Johne's disease testing to move elk out of pastoral zone – to Pierce Point, other sites, and/ or out of the park
    - Hunting Elk
    - Farms need to be sustainable
    - Park should educate public about local food, carbon sequestration, managing invasive species, etc.
    - Park should keep pastoral zone as such:
        - Remove elk

        - Build barrier
        - Lethal means when elk return
    - Manage elk herd in wilderness area!
    - Habitat Enhancement in wilderness
    - Keep elk population in balance in wilderness
    - Why can't fence boundary be at pastoral line? Maintain road on pastoral side.
    - If Johne's testing will take 2 – 3 years, start culling now
    - Allow hunting
    - Control bull elk with elastrator bands – ongoing management to control growing population
    - Park staff cannot (have no ability) to manage elk in pastoral zone
    - Park should embrace pastoral zone as they embrace the wilderness

Discussion Group #13

- Managed Elk in Pastoral Zone
    - Dairy versus beef ranches are different with different challenges
        - Regarding elk management
    - Not possible/ incompatible
    - Smaller exclusion fencing around high quality pastures, but who determines
        - Could be non-starter
    - Substantially reduce herd sizes and compensate ranchers for damage/ reduced forage, etc.
        - Establish carrying capacity of pastoral zone with ranching incorporated and determine appropriate number of elk
        - Incorporate adaptive management test; adjust; implement
    - Fence elk in areas not used for grazing and do habitat enhancement
    - Look at other elk management plans from other N.P.S.
    - *For both scenarios, immediate implementation (e.g. oil spills)

Appendix 2: Public Workshop Materials

Agendas

Agenda
Ranching Practices Workshop
Point Reyes National Seashore (PORE)
Ranch CMP
November 20, 2014

3:00 – 5:30 PM

3:00 PM Welcome and briefing by NPS

- Introductions
- Meeting objectives
- Briefing
- Operating guidelines for meeting
- How the small group discussion is organized – choose 2 topics

3:40 PM Instructions for small group discussions

- Review
  - Roles – facilitator, recorder/reporter, timer, participants
  - Tasks
  - Ground rules
- Tools at each table
  - Flip chart, maps, markers and pens

3:45 PM Round 1: Small group discussion with table facilitators, recorders/reporters, time-keeper

4:05 Organize report out

4:10 PM Report out from Round 1

4:35 PM Transition to Round 2 – will involve movement of participants

4:40 PM Round 2: Small group discussion with table facilitators, recorders and reporters

5:00 PM Organize report out

5:05 PM Report out from Round 2

5:25 PM Next steps

5:30 PM Adjourn

Agenda
Tule Elk Workshop
Point Reyes National Seashore (PORE)
Ranch CMP
November 21, 2014

5:30 – 8:00 PM

5:30 PM Welcome and briefing by NPS

- Introductions
- Meeting objectives
- Briefing
- Operating guidelines for meeting
- How the small group discussion is organized

6:00 PM Instructions for small group discussions

- Review
  - Roles – facilitator, recorder/reporter, timer, participants
  - Tasks
  - Ground rules
- Tools at each table
  - Flip chart, maps, markers and pens

6:05 PM Small group discussions with table facilitators, recorders/reporters and timer-keeper

6:50 PM Organize report out

7:00 PM Report out

7:50 PM Next steps

8:00 PM Adjourn

Handout

Ranch Comprehensive Management Plan Update

November 2014

Welcome to the ranch planning workshop! Ranching has a storied history on the Point Reyes peninsula and surrounding lands, and is an important part of the fabric of Point Reyes National Seashore. This *Ranch Comprehensive Management Plan* (Ranch CMP) marks the first time in the Seashore's history that a plan for and about ranching has been undertaken. Through this public process, we are tapping into the expertise and passion of those who have worked the land for generations, and all who care about this spectacular landscape.

A vital component to the success of this plan is open dialogue between the park, park ranchers, park stakeholders and other interested parties. Towards that end, over the last several months the park planning team has participated in some fifty meetings with park ranchers and twenty-five meetings with an array of community groups and other interested parties. All of these meetings have deepened our understanding of the complexities of ranching operations, and the wide range of public interests.

While two of the overarching objectives of this process are to enable the park to issue 20 year ranch permits and to devise an effective management strategy for tule elk affecting ranch lands, we believe it can do more. The purpose of these workshops is to discuss what we have heard to date, solicit further thought and discussion on the most important issues raised by both park ranchers and the public through the scoping process, and lay out the next steps. In addition to the two workshops, a brief comment period—November 17–26—will be open to gather additional comments. Through these community workshops, we hope to foster a constructive dialog focused on some of the most critical issues that have emerged. Your ideas will both inform and shape the range of alternatives presented this coming summer in the ranch plan.

We face complex issues in preserving the many vital natural and cultural resources protected in this extraordinary unit of the national park system. We believe the ranch plan is an exceptional opportunity to strengthen both the historic working ranches and the superlative natural resources of Point Reyes National Seashore. Our hope is that this conversation forges a new level of understanding and collaboration. We are thankful for your participation.

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Cicely A. Muldoon
Superintendent

Purpose and Need for Action

PURPOSE

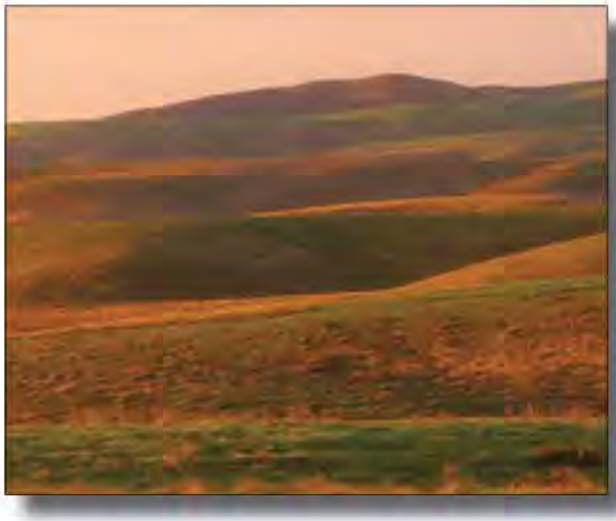
The purpose of this plan is to establish a comprehensive framework for the management of existing ranch lands administered by Point Reyes National Seashore under agricultural lease/special use permits (lease/permits), with terms up to 20 years.

NEED

Ranching has a long and important history on the Point Reyes peninsula and adjacent National Park Service (NPS) lands. These working ranches are a vibrant part of Point Reyes National Seashore and represent an important contribution to the superlative natural and cultural resources of these NPS lands. Protection of these diverse and unique resources is an important responsibility shared by the NPS and park ranchers within the agricultural lease/permit areas. On November 29, 2012, the Secretary of the Interior issued a memorandum authorizing the NPS to pursue long-term lease/permits for dairy and beef ranching operations. The Secretary's memorandum demonstrates the support of the NPS and the Department of the Interior for the continued presence of dairy and beef ranching operations within these NPS lands.

A comprehensive management plan is needed:

- To articulate a clear vision for ranching on existing ranch lands administered by Point Reyes National Seashore.
- To implement the Secretary of the Interior's direction to pursue issuance of lease/permits with terms up to 20-years.
- To address concerns related to elk impacts to existing ranch operations.
- To provide clear guidance and streamline processes for park and regulatory review of proposed ranching activities, including best management practices that promote protection of park resources.



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Pasture Management

Through the planning process, pasture management has been identified as important to beef and dairy ranch operations in the park. Pasture management includes a variety of activities that are intended to enhance the quality and quantity of forage on ranchlands.

Ranchers are currently conducting pasture management activities on approximately 15% of lands under lease/permit.

Pasture Management Activities

Pasture management activities vary from ranch to ranch, depending on the rancher's management approach and interests, and specific site conditions.

Soil Preparation

Pasture management activities may include differing levels of ***soil preparation***, ranging from no-till to discing and plowing and include:

- Aeration
- No-Till
- Tilling
  - Ripping – breaks surface crust and opens a furrow
  - Discing – breaks up clods of soil and smooth's the field for planting
  - Plowing – turns the soil and incorporates residue into the soil

Seeding

The primary pasture management activity proposed by park ranchers for pasture enhancement is ***seeding*** with forage species for:

- Pasture Improvement
- Erosion Control
- Weed Management
- Silage/Haylage/Hay (See Harvest Mowing for more detail)

Nutrient Management

Other pasture management activities proposed by park ranchers for pasture enhancement include ***nutrient management*** with:

- Manure (all park dairies are now organic and have smaller herds than when they were conventional, so less manure is now being spread)
- Compost
- Commercial fertilizer (not on certified organic or natural pastures)

Harvest Mowing

Intensive pasture management activities include ***harvest mowing*** to maximize the use of the forage produced. Harvest mowing is used for the following purposes:

- Silage
  - Silage is cut earlier in the season than haylage and is wetter than haylage
  - Silage is often stored in covered piles or bunkers
- Haylage
  - Cut earlier in the season than hay
  - Baled within a couple days of being cut
  - Wrapped in plastic to allow for fermentation
- Hay
  - Cut later in the season than haylage
  - Dries on the ground and is baled
  - Drier than haylage and is preserved without fermentation
- Windrowing
  - Tall grass is mowed and left in windrows or bailed
  - Does not require seeding
  - Cutting vegetation that is naturally growing

Brush Control and Weed Control

The primary pasture management activities proposed by park ranchers for pasture maintenance are ***brush control and weed control***. These activities are conducted to maintain or increase areas of grassland habitat available for grazing activities. In areas where brush control and weed control activities are implemented, regular maintenance would be required.

- Weed Mowing (early season prior to appearance of flowering seed heads)
- Brush Mowing – May be timed to avoid bird breeding season
- Plowing/discing/tilling/ripping
- Scraping
- Fire
- Seeding
- Chickens foraging on weeds
- Herbicide (not on certified organic or natural pastures)

Fencing

Fencing is an also important pasture management tool, allowing for better control over timing and duration of grazing at any one location. Timely removal of abandoned fences is important for park visitor and wildlife safety.

- Barbed wire livestock fencing
- Electric fencing
- Breaking pastures up into several smaller pastures for more rotation
- Wildlife friendly fencing
- Different type of fencing may be necessary to support other practices (e.g. row crops, sheep, etc.)

Diversification

Diversification was also identified as an important activity for some ranchers, but typically the first priority is to improve pasture management and then focus on potential diversification opportunities. In order to react to poor forage production years, reductions in the price of their products, or increases in the price of inputs such as grain and hay, park ranch operators identified the need to remain flexible and have economic opportunities outside of solely beef or dairy production.

Diversification Activities

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. Some of these diversification activities might be limited to core areas of the ranch where more intensive activities traditionally occur. It should be noted that while some of these activities have been permitted on individual ranches, the Ranch CMP will look at activities across multiple operations within the planning area.

Row Crops

- Non-silage crops
- Dryland farming

Other Types of Livestock

- Stockers (cattle) – This would typically include yearling steers and heifers rather than cow/calf operations
- Chickens, ducks, geese, and turkeys
- Pigs (both in ranch core and pastures)
- Sheep (may require woven wire fences and dogs for protection)
- Goats
  - To eat plants that cows won't eat (would require hot wire or electric fence)
  - Milking and meat goats (in ranch core)
- Rabbits for meat (in ranch core)
- Horses/horse breeding
- Beekeeping
- Worm castings in ranch core

Modifications to Ranch Infrastructure

- Maintain, modify or build structures to support diversification activities or ranch worker housing needs, including:
  - Small scale processing of dairy products
  - On-farm retail sales of products produced on the ranch and other local farm products
  - Additional worker housing

Other Diversification Activities

- Tours with visitors and weddings
- Farm Stay/Bed & Breakfast
- Collaboration with the park on education programs for public

Succession

Succession is the transfer of an NPS lease/permit for continued operation in agriculture. There is a range of options for how the park could evaluate the succession process in the event there is not an immediate family member to take on the lease. These are some of the most common options we've heard:

- Lease to a family member of most recent park rancher
- Lease to a neighboring rancher within the park
- Lease to a non-neighboring rancher within the park
- Put it out for bid for park ranchers only—based on conservation-focused grazing management, not price
- Consider allowing an employee of a park ranch to take over operation or to be eligible to bid for a lease
- Put it out to competitive open bid—based on conservation-focused grazing management, not price

Tule Elk Workshop

Current Elk Status in Pastoral Zone

- D Ranch Herd – 95 estimated total animals. The main herd is a generally cohesive group of approximately 60 elk consisting of females, juveniles, and a few males. The remaining males form one to two small bachelor groups that remain separate from the main herd except during the rut. The main herd and bachelor groups spend time on A Ranch, B Ranch, C Ranch, E Ranch, the former D Ranch, and in surrounding areas with no cattle grazing.
- Limantour Herd – 110 estimated total animals. These elk are spread over a wide area from Coast Camp to as far north as the H Ranch. The females, juveniles, and some males remain in the wilderness area. Approximately 25–30 males spend time on ranch lands along Estero Road through the Home Ranch area. Most activity is south of Sir Francis Drake Boulevard, with only 7–8 elk to the north at any one time. The males return to the wilderness area during the rut.
- Final 2014 census numbers will be complete this winter 2014/2015.

NPS Ungulate Management Plans

- The NPS has a history of developing ungulate management plans that require a long-term commitment to active management and monitoring.
- Currently there are approximately 10 ungulate management plans completed through the National Environmental Policy Act process in the NPS addressing various issues related to management of ungulates including white-tailed deer, bison, elk, and mountain goats.
- The NPS has several tools available for directly managing ungulate populations to meet resource management objectives including contraception, translocation, and fencing, as well as lethal removal by NPS employees, contractors, skilled volunteers, and/or a combination.
- Ungulate management tools are selected based on the type of park unit, location, resource issue, conditions at the park, funding, public input, logistics, and other concerns.

Point Reyes Elk Management Planning Efforts

NPS has been researching and discussing management alternatives for elk on park ranchlands as part of this process. The park has met multiple times with park ranchers and other stakeholders to solicit their feedback. In summer 2014, the park hosted a two-day workshop with the California Department of Fish and Wildlife (CDFW) and the NPS Biological Resources Management Division (NPS-BRMD) to discuss management alternatives and potential management techniques for Point Reyes.

Management Alternatives

The Ranch CMP will present a range of alternatives to address elk on ranch lands. The alternatives will range from “no action” on one end to “no elk in the pastoral zone” on the other end. Alternatives that consider managed elk within the pastoral zone (limited in population size, range, or both) will also be analyzed.

Within each alternative, a combination of management techniques, or tools, would be recommended to meet the management goals of the alternative. Management tools will be evaluated for impacts to Threatened and Endangered species, visitor experience, ranch operations, and other resources, as is typical for a NPS planning document. More importantly, however, in regards to elk management, the proposed tools will be evaluated in terms of:

- Safety (human and animal)
- Effectiveness
- Sustainability
- Law and Policy

Tule Elk Management Techniques

Direct Population Management

Direct population management techniques would cause a decrease in the number of elk within an area using one or a combination of the following techniques:

Contraception

Wildlife populations have evolved highly effective, adaptive and complex breeding ecologies that are key to species survival. The effects of fertility control techniques on breeding ecology and natural selection is not completely understood, and the impacts of wildlife behavior and ultimately species adaptation and survival are unclear. Specifically in elk, the role of these techniques might have impacts on their complex breeding biology.

Fertility control options are generally analyzed in NPS ungulate population planning efforts. However, no agencies within the United States are using only contraceptive techniques for long-term management of elk populations. Contraception trials at Tomales Point were included as a management action in the 1998 elk management plan for Point Reyes.

Fertility Control Treatments

- Potential behavioral changes associated with alteration of natural reproductive cycles through fertility control treatments have not been tested in large populations of free-ranging elk.
- Regardless of the technique, all fertility control methods would require capture, immobilization and marking of the target animals.
- In general, these techniques would require annual treatment by hand injection of between 60% and 90% of the cow elk in the populations to achieve the desired effect.
- Because elk are long-lived animals, the effects of a contraception program on overall population size would be minimal within the first 5–10 years following implementation.
- Past experience suggests that helicopter capture would be required to treat a portion of the population. Initially some portion of cows could be captured from the ground (i.e., ground darting on foot, from a vehicle, or over bait) but most large scale operations require helicopter capture as animals become more difficult to capture after repeated operations.

Translocation

Translocation Outside of Park (to CDFW)

- Translocation of elk outside of the park requires CDFW consent, partnership and identification of a location with capacity for additional elk.
- Tule elk at Point Reyes are the only tule elk in California known to be carriers of Johne's disease.
- Current CDFW policy is to not accept any elk from Point Reyes due to concerns about Johne's disease.
- The disease is difficult to test for due to false negative results that may occur. Elk must be shedding the bacterium that causes the disease in their feces at the time of testing for a positive result. Elk can carry Johne's for years without demonstrating any outward, clinical signs of the disease.
- Point Reyes has initiated a Johne's disease testing program and will use the results to continue our dialogue with the CDFW and explore the option of moving elk out of the park.

Johne's Disease Testing

- The NPS implemented a Johne's disease testing program with University of Wisconsin – Johne's Testing Center in May 2014.
- Sampling occurs every month, alternating between the D Ranch elk herd and the Limantour elk herd.
- The goal is to sample 20–30 individual elk during each sampling round.
- All results to date from the testing program have been negative.

Translocation Within Park

- Translocation options within the park are limited.
- Elk moved to the Limantour wilderness will have a strong impulse to return to their original location. There is a high likelihood that even if a fence is built, elk will try to go around the fence.
- Experimental relocation of elk from D Ranch in early 2015, a cooperative effort planned with the CDFW, will help determine if younger animals stay at the relocation site, or try to return to D Ranch. Three to four elk will be targeted for relocation and then monitored.
- Translocation within the park has the potential to move Johne's disease from pastoral zone elk to wilderness elk. Current Johne's disease testing will help determine this risk.

Lethal Removal

- Several methods of lethal ungulate removal have been used in the NPS, including use of park staff, contractors, trained volunteers, and authorized hunts.
- Population structure goals (i.e., sex and age ratios) would dictate which animals are culled in a given year.
- Elk meat could be recovered to the greatest extent possible. Other programs have provided meat to homeless shelters and to the California Condor recovery program.
- Lethal removal can also serve as a hazing technique. Elk will avoid areas where there is significant hunting pressure. On the other hand, skilled sharpshooting techniques can prevent elk from dispersing.
- Initial removal numbers would be higher, but long-term management would result in limited annual removal requirements.

NPS

Indirect Population Management

Indirect population management techniques are used to augment direct population management and are used to manage an existing number of animals.

Fencing

Fencing Approaches

- The elk fence on Tomales Point fences the elk into a 2,600-acre preserve.
- Where possible, the CDFW has moved away from managing fenced-in elk herds.
- Rocky Mountain National Park recently fenced elk out of willow and aspen groves to protect these sensitive habitats from overgrazing by an expanding elk population.
- The CDFW's approach is to encourage landowners to fence elk out of private lands when other solutions are not viable.
- A fence-out technique at Point Reyes could include erecting fences around ranches or high value pastures.
- A proposal has been made to construct an elk fence along the wilderness/pastoral zone boundary, from the Estero de Limantour to the top of Mount Vision, in order to keep elk within the wilderness area.

Fencing Considerations

- Fencing proposed at the wilderness/pastoral zone edge would be located outside of wilderness.
- An access corridor would need to be constructed along parts of the proposed fence line in order to build and maintain fence.
- Extensive vegetation removal will be required if fence does not run through or at the edge of existing pastures.
- Any elk fence would include design consideration to allow movement of other wildlife through the fence.
- Elk will follow the fence looking for a way through or around, especially if elk are moved from D Ranch to the wilderness side of the fence.
- The planning process would have to include a response plan for when elk get around fence.

Hazing

- Hazing techniques are designed to deter wildlife away from resources in need of protection.
- At Point Reyes hazing has been used since 2012 to keep elk off of high value pastures. Elk are approached on foot and moved to adjacent areas not leased for cattle grazing.

Habitat Enhancements

- The goal of habitat enhancement projects would be to provide elk with high quality habitat in areas adjacent to ranchlands in order to shift elk use away from ranches. Habitat enhancements may include:
  - Water development
  - Weed control and brush control

Tule Elk Facts

Tule elk are the smallest elk subspecies, ranging in size from 400 to 600 pounds.

The annual reproductive cycle results in seasonal changes to elk herd size, composition, and spatial distribution.

Females typically come into estrus and become pregnant during the rut season (August–October in the northern hemisphere).

Only bull elk grow antlers. Each antler can weigh up to 10 pounds. Antlers are shed and regrown annually.

Many agencies accept a mature elk as equivalent to 0.6 Animal Units, or slightly more than half of a mature cow in terms of forage consumption.

How to comment

There are several ways to submit comments on the Ranch CMP Community Workshops.

1. Via the internet through the NPS Planning Environment and Public Comments site at: http://parkplanning.nps.gov/ranchcmp

2. In-person at the public workshops recorded during the discussion groups

3. Mail or hand-delivered to park headquarters:

   Point Reyes Ranch CMP/EA
   Superintendent
   Point Reyes National Seashore
   1 Bear Valley Road
   Point Reyes Station, CA 94956

The public comment period will close on November 26, 2014

Comments will not be accepted by FAX, e-mail, or in any other way than those specified above. Bulk comments in any format (hard copy or electronic) submitted on behalf of others will not be accepted.

You should be aware that your entire comment—including personal identifying information, such as your address, phone number, and e-mail address—may be made public at any time. While you can ask in your comment that your personal identifying information be withheld from public review, the National Park Service cannot guarantee that it will be able to do so.

Overview of Discussion Groups

Ranching Practices and Tule Elk Workshops
Point Reyes National Seashore (PORE)
Ranch CMP
November 20 and 21, 2014

Overview of Volunteer Led Discussion Groups

Purpose of discussion

Small groups will discuss briefing information, consider optional discussion starter questions or topics of their choice, explore areas of commonality and differences, and then report out a brief summary of group discussions. Through reporting out, workshop participants and park staff will have the opportunity to hear about each group's discussion. This is not a consensus exercise. The park is equally interested in differences as well as areas of commonality.

Roles for volunteer discussion leaders

- Facilitator: Keeps group focused and encourages everyone to participate.
- Recorder and reporter (combined role): Use the flip chart and markers to record key phrases, words and ideas. Does not require verbatim note-taking. Work with the group, using the notes, to accurately summarize discussion to the larger group.
- Time-keeper: Monitor the overall amount of time for discussion to encourage group to finish on time. Provide periodic updates on the amount of time spent on a subject and the amount of time left.

Before you volunteer for a discussion leader role

- If you think you want to facilitate: Are you able to listen to different ideas without responding with your own or sending a message that different ideas are wrong?
- If you think you want to record or report: Will your table mates be confident that you can record and/or report all the ideas in the group?
- If you think you want to be a timekeeper: Can you be firm but fair when reminding people about the time?

Ground rules

For the discussion groups to work, all participants are asked to abide by *and* to kindly hold each other accountable for the following ground rules:

- Be respectful in tone of voice and word choice.
- Listen for new information and understanding.
- Speak to your own thoughts and beliefs rather than commenting on other people's ideas.
- Share speaking time.
- Be respectful of the facilitator and time-keepers guidance.
- Let the recorder know if s/he has not captured your idea accurately.

Ranching Practices Presentation

National Park Service
U.S. Department of the Interior

Point Reyes National Seashore

Ranch CMP
Ranching Practices Workshop
November 20, 2014

EXPERIENCE YOUR AMERICA

Pasture Management

Soil Preparation

Aerator

Aerated Ground

Soil Preparation

No-till Drill

Plow

Seeding

- Pasture improvement
- Erosion control
- Weed management
- Silage/haylage/hay

Nutrient Management

Liquid Manure

Solid Manure

Compost

Harvest Mowing

Cutting Hay (alfalfa)

Windrows

Brush Control

Brush

Brush Mower

Weed Control

Italian, milk and bull thistle

Distaff thistle

Rosy sandcrocus
(*Romulea rosea*)

Weed Control

- Mowing
- Plowing/discing/tilling/ripping
- Scraping
- Fire
- Seeding
- Chickens
- Herbicide

Prescribed Fire

Herbicide
(boom sprayer)

Permanent Fencing

Barbed Wire Fence

Woven Wire Fence

Temporary Electric Fencing

Single-strand

Electric Net Fence

Diversification

Sheep

Bees

Row Crops

Pigs

Chickens

Diversification: Ranch Infrastructure Modifications

Processing of Dairy Products

Farm Stand

Worker Housing

Diversification: Other Activities

Farm Stays / Bed & Breakfast

Ranch Tours / Public Education / Weddings

Succession

Thank You

Discussion Ground Rules

- Be respectful in tone of voice and word choice
- Listen for new information and understanding
- Speak to your own thoughts and beliefs rather than commenting on other people's ideas
- Share speaking time
- Be respectful of facilitator and time-keeper guidance
- Let the recorder know if s/he has not captured your idea accurately

Tule Elk Presentation

National Park Service
U.S. Department of the Interior

Point Reyes National Seashore

Ranch CMP

Tule Elk Workshop

EXPERIENCE YOUR AMERICA

Current Tule Elk Status in Pastoral Zone

- D Ranch Herd – 95 estimated total animals. The main herd and bachelor groups spend time on A Ranch, B Ranch, C Ranch, E Ranch, the former D Ranch, and in surrounding areas with no cattle grazing.

- Limantour Herd – 110 estimated total animals. The females, juveniles, and some males remain in the wilderness area. Approximately 25-30 males spend time on ranch lands along Estero Road through the Home Ranch area. Most activity is south of Sir Francis Drake Boulevard, with only 7-8 elk to the north at any one time. The males return to the wilderness area during the rut.

- Final 2014 census numbers will be complete this winter 2014/2015.

Current Tule Elk Status in Pastoral Zone

http://www.nps.gov/pore/parkmgmt/upload/planning_ranch_cmp_background_map_free-range_elk.pdf

Current Tule Elk Status in Pastoral Zone

- Monitoring Efforts
  - Ongoing monitoring since Fall 2010 to document elk numbers and locations within pastoral zone.
  - 4 GPS collars were deployed in October 2012 on 2 bulls and 2 cows. One cow collar is still active.
  - The park has future plans to collar at least two more elk.

Point Reyes Tule Elk Management Planning Overview

- Consultations and Research
  - Rancher meetings and other interested stakeholders
  - NPS units that manage elk
  - Academic professors
  - California Department of Fish and Wildlife (CDFW)
  - National Park Service Biological Resources Management Division
  - Elk Workshop June 30-July 1, 2014 with CDFW and NPS-BRMD

- Range of alternatives
  - No Action Alternative
  - Action Alternatives:
    - Managed elk within the pastoral zone (limited in population size, geographic extent, or both)
    - No elk in the pastoral zone

Point Reyes Tule Elk Management Planning Overview

- Elk Management Tools
  - A set of management tools or techniques will be selected to meet the goals of each alternative.
  - Each action alternative will likely require several management tools.
  - Management tools may be long-term continuous, as needed, or implemented one-time initially.
  - Impact analysis for each alternative – ranching operations, T&E species, visitor experience, etc.
  - Elk management tool considerations:
    - Safety (human and animal)
    - Effectiveness
    - Sustainability
    - Law and Policy

Potential Management Tools for Point Reyes Tule Elk

- Direct Population Management
  - Contraception
  - Translocation
  - Lethal Removal

- Indirect Population Management
  - Fencing
  - Hazing
  - Habitat Enhancements
  - Other mitigations

Potential Management Tools for Point Reyes Tule Elk

- Contraception
  - Fertility control options are generally analyzed in NPS ungulate population planning efforts.
  - Contraception trials (porcine zona pellucida) at Tomales Point were included as a management action in the 1998 elk management plan.
  - No available examples of long-term management of elk via fertility control.

- Fertility Control Considerations
  - Will require capture, immobilization, and marking of elk.
  - 60-90% of cow elk with annual boosters for population level effect.
  - Helicopter captures likely required for this level of effort.
  - Behavioral changes associated with altered reproductive cycles.
  - No population level effect for 5-10 years without other actions.

Potential Management Tools for Point Reyes Tule Elk

- Translocation Outside of Park
  - All other tule elk herds within California are managed by CDFW regardless of landowner.
  - Cannot move elk out of Point Reyes without CDFW partnership.
  - CDFW will currently not accept Point Reyes elk because of Johne's disease risk.
  - Data from current testing will be used to further discussions with CDFW staff.

- Johne's Disease Testing
  - NPS implemented a Johne's testing program for the free-range elk in May 2014 with Johne's Testing Center (Univ of Wisconsin).
  - Monthly fecal samples of 20-30 elk, alternating between D Ranch and Limantour herds.
  - All results to date have been negative for Johne's.

Potential Management Tools for Point Reyes Tule Elk

- Translocation Within Park
  - Elk moved back to Limantour area will have a strong urge to return to capture location.
  - Bull elk captured at L Ranch in 2001 and moved back to wilderness returned to pastoral zone within a week.
  - Similar occurrences noted by CDFW.
  - Transplanted elk will try to go around any newly constructed elk fences.
  - Experimental re-locations planned with CDFW for this winter. Results may be more successful with younger animals that are less imprinted on their home range.
  - Current testing will help determine risk of moving Johne's disease between free-range herds with re-location.

Potential Management Tools for Point Reyes Tule Elk

- Lethal Removal
  - Lethal removal approaches to ungulate management in the NPS have included:
    - park staff
    - contractors
    - trained volunteers
    - authorized hunts
  - Elk meat can be recovered and put to good use – homeless shelters, CA condor recovery.
  - Hunting pressure can also be used as a hazing technique to discourage elk from unwanted areas.
  - Initial removal numbers would be higher, but long-term management would result in limited annual removal requirements.

Potential Management Tools for Point Reyes Tule Elk

- Fencing
  - The elk fence on Tomales Point fences the elk into a 2,600-acre preserve.
  - CDFW has moved away from managing fenced herds where possible (ie. Concord Naval Weapons Station tule elk herd).

Potential Management Tools for Point Reyes Tule Elk

- Fencing
  - Rocky Mountain National Park recently fenced elk out of willow and aspen groves to protect these sensitive habitats.
  - CDFW encourages landowners to fence elk out of private lands when other solutions are not viable.
  - A fence-out technique at Point Reyes could include erecting fences around ranches or high value pastures.

Potential Management Tools for Point Reyes Tule Elk

- Fencing
  - A proposal has been made to construct an elk fence along the wilderness/pastoral zone boundary, from the Estero de Limantour to the top of Mount Vision, in order to keep elk within the wilderness area.

Potential Management Tools for Point Reyes Tule Elk

- Fencing Considerations
  - Fencing proposed at the wilderness/pastoral zone edge would be located outside of wilderness.
  - Access corridor needed for construction and maintenance.
  - Extensive vegetation removal required where fence does not run through or at the edge of open areas.
  - Must consider wildlife passage of other wildlife species.
  - Elk will get around the fence – it is a matter of how soon, how many elk, and what new problems arise when this happens.
  - A response plan will need to be included for when elk get around fence.

Potential Management Tools for Point Reyes Tule Elk

- Hazing
  - Wildlife managers have tested and implemented a variety of hazing techniques to deter wildlife away from resources in need of protection. Birds from vineyards, bears from campgrounds, etc.
  - Hazing of elk at Point Reyes since 2012 to move elk from high value pasture to adjacent area not leased for grazing.
  - Elk approached on foot by park staff.

Potential Management Tools for Point Reyes Tule Elk

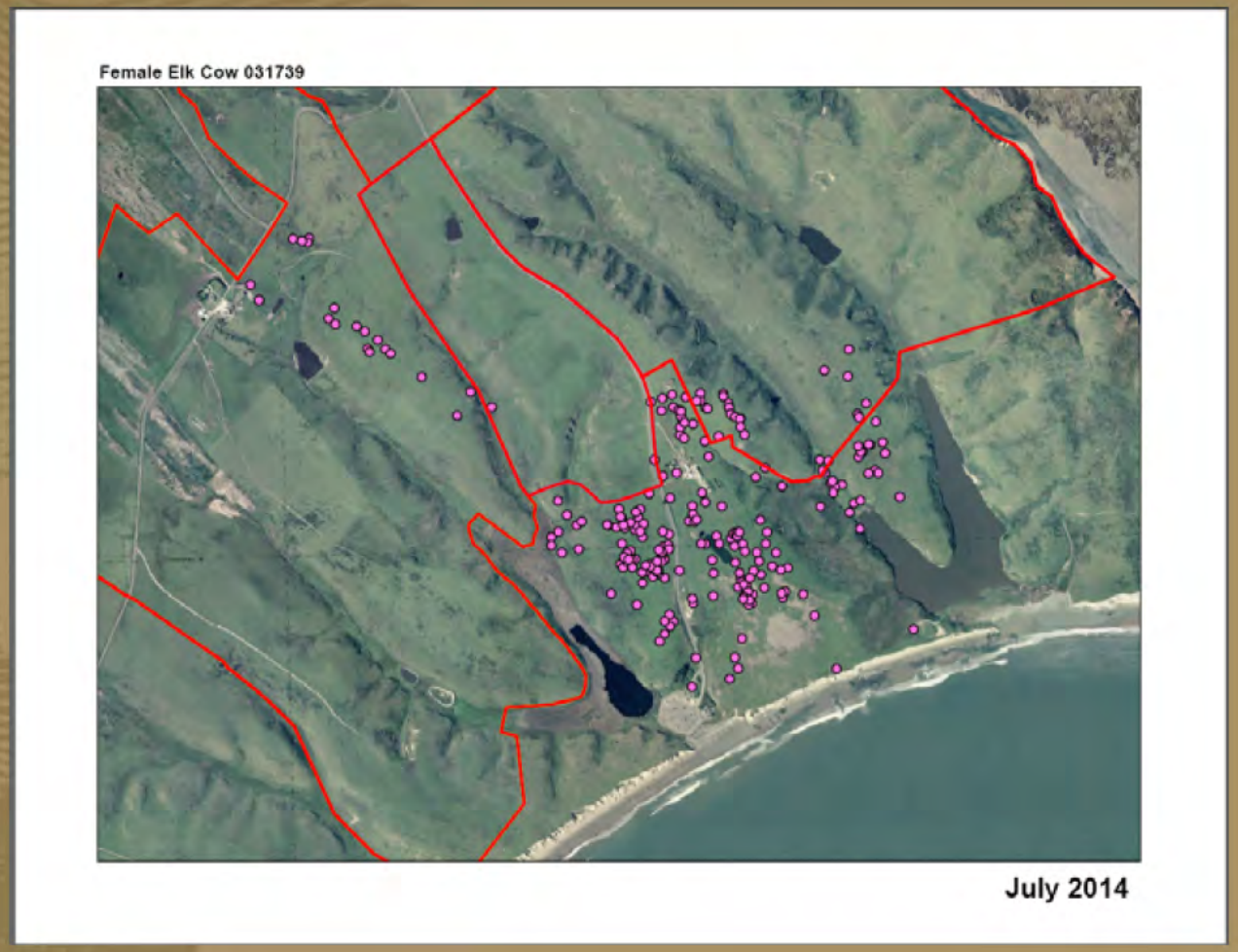
- Habitat Enhancements
  - Goal would be to provide elk with high quality habitat in areas adjacent to ranchlands in order to shift elk use away from ranches.
    - Water development
    - Weed control
    - Brush control
  - D Ranch water project implement in August 2013.
    - Two 5,000 gallon tanks and 3,000 feet of pipe to maintain water in existing ponds frequented by elk.
    - Water from Drakes Beach water system used to keep ponds full until rains arrive.
  - Weed control also planned for same area to provide additional forage.

Potential Management Tools for Point Reyes Tule Elk

- Habitat Enhancements

Potential Management Tools for Point Reyes Tule Elk

- Habitat Enhancements



Potential Management Tools for Point Reyes Tule Elk

- Other Mitigations
  - NPS can fix fences and/or provide fence material to ranchers.
  - Well-placed lowered crossings constructed by the NPS can also reduce fence damage.
  - Alternative fence designs and crossings following recommendations from other agencies.
  - Provide additional pasture to ranchers affected by elk.

Tule Elk Workshop Discussion

- No Elk in the Pastoral Zone
  - What combination of tools would work if the goal was to keep tule elk out of the pastoral zone?
  - Identify actions that are long-term continuous, immediate need, or as needed.
- Managed Elk in the Pastoral Zone
  - What combination of tools do you think would work to allow a managed tule elk herd (limited population size, limited range, or both) in the pastoral zone?
  - Identify actions that are long- term continuous, immediate need, or as needed.

Tule Elk Workshop Discussion

- Ground Rules
  - Be respectful in tone of voice and word choice.
  - Listen for new information and understanding.
  - Speak to your own thoughts and beliefs rather than commenting on other people's ideas.
  - Share speaking time.
  - Be respectful of the facilitator and time-keepers guidance.
  - Let the recorder know if s/he has not captured your idea accurately.