



Board of Directors

Bridger Mitchell, Ph.D.
President

Ken Drexler, Esq.
Vice-President

Terence Carroll
Treasurer

David Weinsoff, Esq.
Secretary

David Wimpfheimer
Director

Jerry Meral, Ph.D.
Director

Cynthia Lloyd, Ph.D.
Director

Staff and Consultants

Morgan Patton
Executive Director

Ashley Eagle-Gibbs, Esq.
Conservation Director

Jessica Reynolds Taylor
Development Director

Catherine Caufield
Tomales Dunes Consultant

November 30, 2018

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

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

Dear Superintendent Muldoon,

The Environmental Action Committee of West Marin (EAC) greatly appreciates the opportunity to provide comments on the National Park Service (NPS) Point Reyes National Seashore (Seashore) General Management Plan Amendment (GMPA). Since 1971, EAC has worked to protect and sustain the unique lands, waters, and biodiversity of West Marin. EAC's membership represents 1,000 individuals with 56% of our membership located in Marin County.

Since 2014, EAC has been actively involved in the public processes concerning proposals for continued ranching within Point Reyes National Seashore (Seashore) and Golden Gate National Recreation Area (GGNRA).

Part of that process has included collaborative discussions with a variety of stakeholders to better understand challenges, perspectives, and find

common ground on the complicated issues in the GMPA. To this end and through this process, EAC has met with representatives from the Point Reyes National Seashore Ranchers Association, fellow local environmental organizations, and national environmental organizations. EAC is strongly supportive of the public planning process for the GMPA as a way to work collaboratively to find solutions to ensure: transparency in decision-making and public confidence in management of the Seashore; identification of solutions for conflicting national park priorities; protection and preservation of natural resources; restoration of degraded habitats and other park resources; and opportunities for maximum public access to parklands.

EAC believes the GMPA must protect, restore, and preserve park resources using ranch leases that ensure multi-generational, environmentally sustainable ranching that is complementary to the natural resources and visitor experiences in the park.

EAC understands the Seashore is utilizing discretionary authority as provided by the Secretary of the Interior¹ and Director of National Parks² to authorize extension of leases for beef and dairy ranches. Through this authority, the Seashore will apply the fundamental purposes of the NPS Organic Act to “to conserve the scenery and the natural and historic objects and the wild life therein and to provide for the enjoyment of the same in such manner and by such means as will leave them unimpaired for the enjoyment of future generations³” and the Seashore’s Enabling Legislation, “to save and preserve, for purposes of public recreation, benefit, and inspiration, a portion of the diminishing seashore of the United States that remains undeveloped⁴.”

EAC’s comments are organized based on Alternative B and the list of impact topics presented in the GMPA newsletter. The newsletter indicates that under all alternatives, specific impact topics will be analyzed within the Environmental Impact Statement to ensure recommended management strategies will be protective of the natural and cultural resources of the Seashore. In consideration of these topics and Alternative B, EAC offers the below comments for consideration by NPS:

¹ United States Department of the Interior, National Park Service, *Point Reyes National Seashore – Drakes Bay Oyster Company*, November 29, 2012.

² United States Department of the Interior, National Park Service, *Delegation of Authority for Point Reyes National Seashore Agricultural Leases and Directions to Implement the Secretary’s Memorandum of November 29, 2012*, January 31, 2013.

³ Pub. L. 535, *An Act To establish a National Park Service, and for other purposes*, 1916.

⁴ Pub. L. 459c, *Point Reyes National Seashore; purposes, authorization for establishment*, 1962.

NPS Proposed Action (Alternative B):

Alternative B proposes a list of approaches to address ranching management strategies and regulations, programmatic approaches to best management practices and definition of conservation mapping, management of natural resources that currently conflict with commercial ranching operations, and a program to identify and restore historic and cultural infrastructure. There are, in addition, topics and strategies overlooked in the proposed action that should be included in additional detail.

1. Protection and Preservation of Natural Resources

The Seashore is one of the few national parks with active beef ranching and dairy operations. This framework provides an opportunity to demonstrate a unique and scientifically based ranch lease arrangement that ensures the protection and preservation of natural and cultural resources and multi-generational environmentally responsible ranching. To accomplish this, the Seashore must clearly outline specific management strategies for beef and dairy operations to support environmentally responsible practices.

1.1. Baseline to Inform Management

A baseline must be established against which to evaluate current operations in order to inform several of the proposed NPS management strategies including: operational flexibility, diversification, conservation framework mapping, environmental impacts, and programmatic review of best management practices.

EAC recommends that baseline conditions be those uses specifically described by the 2012 Secretary of the Interior's Memorandum regarding Drakes Bay Oyster Company⁵, and the 2013 Director of the National Park Service's Delegation of Authority for Point Reyes National Seashore Agricultural Leases Memorandum that authorizes the "issuance of lease/permits for the purpose of grazing cattle and operating beef and dairy ranches, along with agricultural residential uses by the lessees and their immediate families and their employees, and employees' immediate families..."⁶

Any variation of uses from this baseline should require evaluation through a public National Environmental Policy Act (NEPA) process and be balanced with a conservation framework or conservation ranch plan.

⁵ See citation 1

⁶ See citation 2

1.2. Long-term Permits/Leases

The GMPA should provide clearly defined regulations and management goals for beef ranching and dairy practices within the Seashore to ensure the protection, restoration, and preservation of natural and cultural resources. Consideration of issuing new permits/leases for beef ranching and dairying within the planning area should include definitions, goals, and management strategies that outline how operations are complementary to the Seashore and how to avoid habitat degradation. In addition, all versions of leases and permits (with appropriate privacy redactions) must be posted so that the public can make properly informed comments during the public GMPA process.

EAC understands NPS has discretionary authority to continue to issue leases/permits for ranching and dairying in the Seashore and EAC is supportive of NPS continuing to exercise this authority by issuing long-term leases/permits; but any such leases must be designed to ensure the protection, restoration, and preservation of park resources and be issued only to an existing lease holder.

In the situation where an immediate family member is not able or willing to take on a new lease, NPS should prioritize adaptive reuse for the historic district landscapes and structures, with conservation designated as the primary management objective. If NPS believes that all things considered, its management goals can best be met by issuing a lease/permit to a new lease/permit holder, a NEPA evaluation should be conducted to determine if continued ranching at that lease/permit area is compatible with the Seashore's resources or if that area would be better served as a conservation lands.

EAC recognizes that over the last 20 years, NPS has issued leases/permits for retired pastoral lands. Those commitments should be honored and future extensions of those leases/permits should be subject to environmental analysis and review to ensure that practices continue to be compatible with park resources.

Long-term leases/permits should be determined through a transparent process and ensure ranching practices are compatible with the Seashore's mission to protect natural and cultural resources and are complementary to visitor experiences within the park.

1.3. Conservation Framework

NPS proposes a conservation framework, "in order to ensure protection of natural and cultural resources, streamline the permitting process, and provide consistent guidance to ranch operators, a zoning framework of ranch core, pasture, and range will be applied to all action alternatives that

include ranching...⁷". EAC understands the conservation framework will be used to guide decision-making for new activities and to provide greater operational flexibility for existing activities while protecting park resources. We request precise maps that define conservation areas be made available to the public.

EAC has questions concerning the relationship of the conservation framework with a traditional conservation plan for ranches and dairy operations. Conservation plans generally focus on land management objectives, examine natural resource concerns and opportunities for restoration and enhancement, locate areas for protection, restoration, and improvement, review recommendation for conservation systems or individual practices, and weigh alternatives and prioritize economic activities for the ranch⁸. The proposed NPS conservation framework is a *land-use* framework that contains elements of conservation. Conservation should be the highest priority of the framework, with other elements subordinate and complementary to that priority.

Areas for Ranching and Dairy operations should be geospatially delineated to show the locations of existing resources like structures, roads, pastures, water sources, creeks, etc. to inform improvement in management practices. Resource buffers are a specific concern, as they are essential to protect sensitive habitats and ensure ecosystem health. EAC prefers the Seashore act proactively to spatially analyze areas to protect unique ecosystem, biodiversity, and cultural sites.

How will the conservation framework incorporate the protection of park resources and the needs of rancher's commercial operations? What guidance will NPS utilize to balance these priorities that at times are conflicting?

Conservation frameworks should include spatial data to analyze and identify areas that are also vulnerable to changing conditions including rising sea levels, reductions in average rainfall, and increased average temperatures, and locations of federally listed and special status species should be mapped, along with likely changes to those locations under different climate change scenarios. This will ensure appropriate protection of species and habitats, as directed by the 2006 NPS Management policies which direct natural resources to be managed in order to preserve fundamental physical and biological processes. In the cases of special status and endangered

⁷ United States Department of the Interior, Point Reyes National Seashore, General Management Plan Amendment Newsletter, Page 10, November 2018.

⁸ United States Department of Agriculture, Natural Resource Conservation Service, Conservation Planning, <https://www.nrcs.usda.gov/wps/portal/nrcs/main/national/technical/cp/>

species, NPS is legally compelled to protect habitat, and should proactively protect reasonably foreseeable future habitat areas.

1.4. Conservation Ranch Plans and Best Management Practices

Best Management Practices (BMPs) are used to improve commercial operational practices in order to promote the protection of park resources. BMPs should be developed and include measurable outcomes and expectations for operators. These BMPs should be common-sense and practical solutions that allow for operational flexibility and ensure park resources are protected. In short BMPs should be established through a programmatic approach to maximize environmental sustainability of ranches and dairies.

EAC is supportive of BMPs that promote the protection of park resources by defining measurable goals and outcomes balanced with the ability for operators to comply with rules and NPS to enforce the permits. Sensitive resources like wetlands, riparian corridors, and estuaries are of particular concern. Water quality and overall health of these habitat areas should be safeguarded and prioritized over any operational practices.

In addition, BMPs within the Seashore should strive to be the most environmentally protective in order to demonstrate environmentally sustainable operations occurring within a National Seashore which is currently not characterized exclusively for ranching and dairying.

To ensure public confidence, management guidelines, ranch plans, and BMPs should be transparent, appropriate for the operation type and size, and applied in an organized and uniform manner and should be made available to the public.

1.5. Soil Processes, Erosion and Compaction

The GMPA should address all of the complexities of soil health and its relationship to water quality, plants and animals within the Seashore. EAC encourages proactive approaches to improving soil health through common-sense solutions that are currently in place in areas outside of the Seashore. This includes addressing pasture management, animal unit counts, water quality, and native plants.

1.6. Pasture Management

Pastures and grazing should be managed in accordance with the 2015 Residual Dry Matter Analysis Report that includes adaptive management strategies to understand overall pasture health and grazing patterns. In addition, the Seashore should map current areas where manure is applied to

validate compliance with regulations concerning slope and proximity to water sources. Any locations where nutrients may impact water sources should be remapped to remove areas with such impacts.

In order to protect rangelands and coastal prairies, what RDM techniques will be applied to ensure accurate measurement of rangelands and prevent overgrazing? What actions will the Seashore take in response to indications of overgrazing?

1.7. Allowable Animal Units

Additional consideration of pasture management should include a review of the numbers of animal units allowed for each lease/permit. Currently, dairies generally range from 350-850 in stocking animal units, and beef grazing operations from 5-312 stocking animal units. Many of the leases restrict grazing to specific times of year or include a maximum number of animals that may graze at one time. Assuming the GMPA will update these animal unit totals, what criteria will be used to determine grazable land for the number of animal units within the Seashore based on current environmental carrying capacity for each lease/permit? In addition, the number of animals allowed for grazing should be compatible with the State of California's 40% methane gas reduction goals outlined in Senate Bill 1383.

1.8. Water Quality

In order to ensure healthy and balanced habitats and safe clean water for species and visitor access in shoreline areas, the water quality of streams, creeks, wetlands, estuaries and beaches should be subjected to independent research to determine acid-base status, nutrient conditions, and chemical stressors. NPS 2006 Management guidance recommends protection and restoration measures should be considered to improve water quality of natural riparian habitats and preserve natural system components.

Currently, the ranches and dairies that discharge into the Tomales Bay Watershed are regulated by permits or conditional waivers issued by the Regional Water Quality Control Board (RWQCB). Dairies and grazing operations that exceed 50 acres are required to complete Ranch Water Quality Plans (RWQP). We request the RWQP documents be made available to the public for review and transparency.

For operations not located within the Tomales Bay Watershed and discharging to the Pacific Ocean, what water quality standards are currently being implemented by the Seashore? What processes are currently in place to proactively protect water quality within the Seashore?

The beneficial uses of water are protected by the Clean Water Act. Regardless of the operation type or location of the operation (within an impaired watershed), the Seashore is responsible for protecting beneficial uses. To ensure this protection in areas where freshwater discharges into the Pacific Ocean EAC recommends the Seashore implement a standard RWQP and a water sampling program for creeks, seasonal streams, and estuaries, and build a publicly-available data-set to inform management strategies and guide resource allocation for restoration and water quality improvements.

1.9. Operational Flexibility

As specified in the 2013, Delegation of Authority Memorandum, by National Park Service Director Jonathan Jarvis:

“In order to assure clarity and consistency for all permits, to clarify expectations and commitments, and to allow for operational flexibility inherent to the long-term beef and dairy operations, I direct the park superintendent to review the permit structure to assure that it reflects and protects the interests of ranch operators while meeting NPS responsibilities to protect natural and cultural resources.”⁹

Operational flexibility should allow for environmental improvements for ranches and dairies by simplifying operational processes; however, it must be limited to flexibility in current activities and maintenance and be integrated within the conservation framework. For example, repair of a water line or improving rain gutters to reduce run-off of manure.

Under Alternative B, NPS will explore opportunities for operational flexibility and diversification. EAC understands these terms to be inherently distinct and should not be grouped. Flexibility in managing existing beef and dairy operations is a legitimate and desirable goal of a long-term planning framework. Diversification is new commercial uses outside beef and dairy ranching.

⁹ See citation 2

1.10. Diversification

EAC is not supportive of diversification, which we define as new commercial land uses outside of cattle ranching and dairying that impact park resources or visitor experience.

If NPS is considering authorizing diversification within the planning area, any new uses should be limited to the ranch core, and there must be a separate transparent public process and specific NEPA evaluation for any new proposed uses to identify environmental conflicts and appropriate mitigation to ensure consistency with the purpose for which the Seashore was established. This process allows for comprehensive and thoughtful review of potential conflicts with park resources including predators, water use, impacts on native species, visitor experiences, and cultural resources.

Any current permits for diversification including silage production and raising chickens, if a NEPA analysis was not conducted for that use, should require evaluation following the GMPA. This would ensure these practices do not impair resources and allow for mitigation.

1.11. Silage Production

The Seashore has recorded observations of more than 490 bird species (more than 50% of North American avian species)¹⁰ and is located along the Pacific Flyway. During the spring migratory bird and nesting season, NPS takes measures to monitor vegetation for nesting and migratory birds prior to any trail maintenance seasonally, but ranchers within the planning area are allowed to mow silage fields without the same requirements. The impacts to migratory and nesting birds need to be considered and mitigated within the Seashore to ensure that resources are not impaired. In addition, there are BMPs that could be implemented for production of silage that reduce environmental harm, including no-till practices, advance bird surveys, adjustments in mowing schedules, etc. Without a review, there is not a way to ensure practices are least environmentally harmful.

1.12. Changing Conditions (Climate Change)

Changing environmental conditions, like climate change, will impact park resources in the near future including sea-level rise, average temperature changes, average rainfall totals, and distribution of native and non-native species. These changes will alter the ecology and landscapes of the Seashore in many ways. For example, areas that border coastlines and estuaries will

¹⁰ United States Department of Interior, National Park Service, Point Reyes National Seashore, *Birds*, June 3, 2018. <https://www.nps.gov/pore/learn/nature/birds.htm>

experience flooding and the migration of natural resource boundaries. This includes wilderness areas like Drakes Estero and Abbotts Lagoon that may migrate into the pastoral zone. How will the Seashore manage these changing conditions and adjust the boundaries between the planning area and wilderness areas accordingly?

EAC recommends proactive planning in this area to reduce conflicts with pastures and resources in the near future. Adjustments to lease borders based on the existing and future boundary migrations should be addressed in this GMPA process as leases may be issued for up to 20 years. The Seashore should use the best available science to determine impacted areas and spatial mapping to make decisions to protect threatened natural and cultural resources.

1.13. Air Quality and Greenhouse Gas

EAC would like to better understand how the Seashore plans to address impending challenges presented by short-lived greenhouse gases (methane) produced in the Seashore. In 2016, California passed SB 1383, adopting regulations to reduce by 2030 methane emissions from livestock and dairy operations by 40% of the 2013 emission levels, with regulator implementation by 2024¹¹ (just four years after the GMPA completes). EAC is hopeful the Seashore will consider the methane reduction goals by the State of California in their programmatic review of BPMs and review of animal unit counts.

Carbon Farming is a set of management techniques that contribute to reduce greenhouse gas emissions from ranches by employing several techniques to sequester carbon. The most effective carbon farming techniques that yield the longest-term carbon sequestration include restoration of habitat, improving water quality, windbreaks, native plantings, and no-till farming practices. In addition, rotational grazing, no-scrape dairy manure management, and methane digesters are other practices that can be utilized to reduce greenhouse gas emissions from ranches and dairies.

Carbon Farming practices within the Seashore should be supported by long-term data sets and scientific standards to ensure that implementation of these practices do not impair the parks resources. For example, compost spreading could harm native vegetation on the coastal prairies by stimulating non-native plants through use of excess nutrients.

¹¹ California Senate Bill 1383, Lara. *Short-lived climate pollutants: methane emissions: dairy and livestock: organic waste: landfills*, September 19, 2016.
https://leginfo.ca.gov/faces/billTextClient.xhtml?bill_id=201520160SB1383

1.14. Tule Elk and Associated Habitat

The Seashore is the only National Park with a native population of tule elk. The elk have been prevalent in the Bay Area and Marin for thousands of years, long before their extirpation in the 19th century. Tule elk are considered natural resources and are an important part of the Seashore's ecosystem. Although tule elk are not a listed species, they are an important economic and natural resource for the Seashore that should be considered in addition to the lease/permit obligations that the Seashore holds. Removal of the Drakes Beach herd will have negative impacts to visitor experiences within the Seashore and brings back unsettling memories of the removal of the non-native axis deer. Any strategies to manage the elk populations should be in the context of managing natural resources like any other resource within the Seashore and not for the benefit of commercial lease holders.

EAC believes there is a middle ground concerning areas of conflict with the Drakes Beach tule elk herd, where both elk and cattle may co-exist. Where conflict arises with commercial permit/lease holders, NPS should consider an incentive program that addresses the encroachment of natural resource into areas that have been contractually designated for commercial use. For example, compensation for loss of forage, reduction of cattle herd size, repair of fencing, and current market value for loss of milk production due to encroachment of elk.

To minimize conflict, adjustment of boundaries, incentives for ranchers, and fencing the cattle from the elk are all non-lethal options that can be explored. A diverse sets of management tools can be utilized that do not involve lethally removing the herds. EAC is not supportive of any management of the tule elk herds that involves lethal removal. Long-term leases and overall BMPs should strive to reduce conflicts with the tule elk to find a balanced way to accommodate the presence of both cattle and elk.

The Phillip Burton Wilderness area should not be manipulated as part of any management strategy, absolutely no structures should be authorized in the wilderness areas.

The GMPA should protect and manage natural resources, including tule elk, with conservation of these resources as the highest priority, as mandated by the Seashore's mission and current NPS management policies. Long-term leases and overall management strategies should strive to reduce conflicts and find non-lethal management strategy to balance and accommodate the presence of elk and cattle.

1.15. Non-Native, Invasive, and Noxious Plants

Protection of the native plants within the Seashore must be a priority within the GMPA planning area. The conservation framework should provide spatial mapping of native plants and identify appropriate habitats for restoration. In particular, protecting the natural habitat of the coastal prairie and grasses is essential and part of the Seashore's unique character.

EAC recommends that leases that have a border with private property have prevention management practices in place to prevent encroachment of non-native and invasive species that deplete habitat for native species and forage in the planning area. Some examples of invasive plants of particular concern to ranchers and the Seashore include woolly distaff thistle, purple star thistle, and gorse.

Invasive species may be introduced into an ecosystem through infested soil, animal fur, and imported feed. Forage and mulch products may contain seed or reproductive parts from non-negative, invasive, and noxious weeds. EAC would prefer that programmatic BMPs include a requirement for any lease holder that imports hay, hay cubes, straw, grain, and/or other crop mulch products into the Seashore to use certified "weed free" products that meet the standards of the North American Weed Management Association. This method is successfully implemented in the Deschutes National Forest managed by the USDA in order to prevent degradation of ecosystem health¹².

1.16. Pesticides, Chemicals, and Integrated Pest Management

The GMPA should require a permit/lease condition mandating disclosure of the chemical types, storage techniques, and uses for pesticides, antibiotics, insecticides, herbicides, etc. to prevent these toxins from being released into the environment through improper storage, in the event of a natural disaster, or inadvertent applications.

In addition, Integrated Pest Management (IPM) plans should be developed by the Seashore and distributed to the lease/permit holders for implementation. Pesticides that have the potential to impact other species should not be applied under any conditions, for instance, rodenticides that would harm other species.

¹² United States Department of Agriculture, Forest Service, Deschutes National Forest, *Livestock in the Forests – Weed Free Feed is Required*. <https://www.fs.usda.gov/detail/deschutes/learning/nature-science/?cid=stelprdb5300707>. Accessed November 29, 2018.

For lease holders that manage weeds in the Seashore the GMPA must include the data on the current uses and impacts of pesticides, chemicals, herbicides, and mowing.

2. Restoration of Degraded Habitats

The GMPA and conservation framework must prioritize habitat restoration. Many of concerns over continued ranching and dairying within the Seashore center around degraded and impaired habitat. Protecting water quality and avoiding erosion and native plant and species impacts should be prioritized to ensure that ranching operations are meeting the highest possible environmental compatibility standards.

2.1. Prioritizing Restoration Activities

The current proposal by NPS is not clear on the mechanism or process of habitat restoration. Through discussions with NPS staff, EAC understands there is a database that identifies potential projects and tracks completed projects. EAC would like this document to be made publicly available (with appropriate redaction) for the maximum amount of public transparency concerning this important topic so that the public is better able to understand and potentially partner with the Seashore to improve habitat.

Within the conservation framework and programmatic BMPs, NPS should consider habitat restoration flexibly in order to improve efficiency, funding, and third-party partnerships to identify and complete restoration projects within a year. EAC understands that some ranchers are not aware that funding is available for conservation related projects that could improve not only habitat within the Seashore but economic efficiency in their operations. The conservation framework should proactively identify areas where improvements may be made and create pathways for conservation and restoration projects to be completed within a two-year timeframe.

2.2. Water Quality Improvements and Data

Over the last two years there have been reported concerns over water quality within the Seashore and not enough data being collected by NPS or third-party partners to ensure that Clean Water Act standards are being achieved. EAC understands that many of the beef and dairies are operating under RWQCB permits or conditional waivers; however, not all operations hold permits and at times in the past there have been low overall compliance rates and RWQCB staffing issues. Ultimately, NPS is responsible for protecting beneficial uses as required by the Clean Water Act. EAC would like NPS to prioritize and increase resources for additional water quality sampling in all

creeks and estuaries within the planning area boundaries to better inform management strategies, water quality goals, and ensure compliance with the Clean Water Act.

3. Public Access

All the alternatives presented by NPS include language to improve visitor access to the planning area through improved hiking trails, biking, equestrian access, and camping. This would create new opportunities for visitors to experience different areas of the Seashore. EAC is supportive of appropriate increases of public access in currently disturbed areas to safeguard park resources and respect lease/permit holder pasture use.

3.1. Visitor Experience Diversification

Any proposals to diversify visitor experiences for major events, farm stays, or tours, should be managed by the Seashore or by an authorized concessioner. Individual lease holders should not have the authority to permit special events, farm stays, tours, or visitor experiences without complying with NPS Concessioner standards. Currently, any concessioners providing visitor experiences within NPS are subject to Concessioner standards to meet NPS hospitality standards that include program standards, environmental management, risk management, public health programs, and are rated annually to ensure those standards are being achieved¹³.

3.2. Bike Trails

EAC is supportive of creating connections for existing bike trails and loops within the planning area. However, new trails that would traverse through pastures could create erosion, negative encounters with cattle, and further congest the narrow roadways. Any plans for placement of new biking trails should require a NEPA evaluation and extensive public input.

3.3. Trail Improvements

EAC is supportive of improving trails within the planning area to allow additional access for visitors. However, the process of creating trails and access points needs to include public education and new infrastructure to reduce public safety risks, protection of cattle, and ensure that visitors respect the homes of lease/permit holders.

¹³ United States Department of Interior, National Park Service, *Concessioner Tools and Information*, <https://www.nps.gov/subjects/concessions/cti.htm>

For example, creation of new access points in the planning area would allow for visitors to access the Pacific Ocean by walking through pastures. If these are developed, EAC recommends installing “c” style gates that avoid cattle escaping through an open gate and creating a public safety risk and difficulty for ranchers. In addition, public information and materials should be posted at the locations that indicate appropriate etiquette when near cattle, not to enter the ranch core, and to not leave trash or waste behind. Increased signage, interpretative materials, and maps will help the public understand how to appropriately navigate through the planning area respecting both the natural resources and the need of the lease/permit holders.

3.4. Trash & Visitor Waste

The Seashore welcomes more than 2.5 million visitors per year¹⁴ and ensuring appropriate disposal of trash and human waste are critical issues to protect park resources. With the creation of new trails, what plans does the Seashore have to proactively handle the new amount of trash and waste that would generate? How will the Seashore ensure that there is appropriate advance education about the services of the Seashore? How will the Seashore protect park resources, including historic, cultural, and natural resources with increased visitation in areas?

In addition, California Senate Bill 1383, intended to regulate short-lived greenhouse gases, is regulating the statewide disposal of organic waste to reduce methane levels. Solid wastes are defined as materials from living organisms and their metabolic waste products that include food, green waste, landscape, wood, lumber, fibers, biosolids, digestate and sludges. The implementation of this law will require a 50% reduction in the level of statewide disposal of organic waste to landfills by 2020 and 75% reduction by 2025¹⁵.

If the Seashore’s trash is collected and distributed to a California based landfill, organic waste and recycling efforts will require improvements to ensure maximum rates of recycling and composting with limited organic waste disposal.

4. Enforcement

The GMPA provides an opportunity to standardize practices through a programmatic approach that will be protective of all park resources (natural, historic, and cultural). To ensure the success of the GMPA, appropriate resources need to be allocated to implement this essential protection. Currently,

¹⁴ United States Department of Interior, National Park Service, Point Reyes National Seashore, *Park Statistics*, <https://www.nps.gov/pore/learn/management/statistics.htm>, last updated March 3, 2016.

¹⁵ California Department of Resources Recycling and Recovery, *Short-Lived Climate Pollutants (SLCP): Organic Waste Methane Emissions Reductions*, <https://www.calrecycle.ca.gov/climate/slcp>, October 19, 2018.

there are only two range managers for 28,000 acres of ranches and dairies. Ideally, there would be additional staff assigned to assist with managing the ranches and ensuing lease compliance. In order to ensure maximum success and adoption by ranchers, NPS staff should be able to create a partnership with the ranchers to assist with standardized regulatory compliance paperwork, identifying opportunities for seeking grants and funding for conservation projects, and enforcing terms and conditions of leases. These partnership models work very well for land conservation organizations.

Conclusion

Thank you for this opportunity to present comments on the GMPA. EAC looks forward to actively participating in the GMPA process to ensure the protection, restoration, and preservation of park resources using ranch leases that ensure multi-generational, environmentally sustainable ranching that is complementary to the natural resources and visitor experiences within the park. Specifically, impacts to water quality, erosion, native plant and species must have the highest priority to ensure that park management achieves the greatest possible level of natural resource protection.

Sincerely,

A handwritten signature in black ink, appearing to read 'MP', with a long horizontal flourish extending to the right.

Morgan Patton
Executive Director