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November 21, 2017

Cynthia MacLeod, Acting Superintendent  
Point Reyes National Seashore  
1 Bear Valley Road  
Point Reyes, CA 94956

RE: Comments on General Management Plan Amendment Concepts

Dear Acting Superintendent MacLeod,

Thank you for the opportunity to submit comments on the General Management Plan Amendment (GMPA) Concepts.

River Otter Ecology Project, based in Marin County, CA, engages the public in supporting conservation and restoration by linking river otter recovery to the health of our watersheds through education, research, and community science. River otters, although not a protected species, are sentinel apex predators that use every part watersheds, from headwaters to ocean. Their presence and success are important indicators of ecosystem function and environmental health.

For nearly six years, we have conducted intensive research on river otter populations within Point Reyes National Seashore (PRNS). Consistent with NPS Management Policy 4.2, our “studies support the NPS mission by providing the Service, the scientific community, and the public with an understanding of park resources, processes, values, and uses that will be cumulative and constantly refined.”

Our research entails field study in the PRNS at least once a week at up to 10 different sites, and we’ve had abundant opportunity to observe and document changes and conditions that affect the natural resources and visitor experience in the Seashore.

Some of our observations connected to ranching uses in the Point Reyes National Seashore include the following:

1. Cattle are regularly outside their pastures and the pastoral zone at Abbott's Lagoon. There is no time that we don't find cattle sign (prints and droppings) around the outer Lagoon at Abbott's, close to the foot bridge. What strategies will the GMPA propose to ensure that cattle do not encroach on and impair park resources in wilderness areas?
2. The most egregious example was in 2016 when approximately 10 young cows made their way to Abbotts outer lagoon, and proceeded to spend the next 4-6 weeks around the inner and outer lagoons, trampling plants, causing erosion and impeding access for wildlife to their foraging areas. We informed PRNS staff, who informed the rancher, but nothing was done for many weeks. Will the GMPA outline penalties or other sanctions for ranchers whose cattle habitually roam and graze outside the ranch lease areas?
3. Many fences in the pastoral zone are not wildlife friendly. Many are battered, broken, or missing the upper and lower "wildlife friendly" wires lacking the barbs that allow wildlife to pass without harm.
4. We are concerned about water quality in the stock ponds, which may be detrimental to wildlife habitat due to erosion, run-off, siltification, and nitrogen overload.
5. We often see barbed wire or other harmful wire left in fields for long periods of time. These are hazards to wildlife, as well as detrimental to visitor experience.
6. We occasionally take volunteers or other visitors to see river otters in the PRNS. We get many questions about why the "whole park" seems to be ranching. We're aware that it is not the whole park, of course, but there is that perception. Our walks tend to be conservation outings, explaining the importance of watershed conservation not only for humans, but also for wildlife. There's an obvious disconnect between conservation and ranching values and practices in the PRNS, and it is noticed.

We have questions about the Management Alternatives, and request that the following issues are clarified:

1. Tule Elk: We will not support any alternative that includes "culling" of the herds. The PRNS has a responsibility to preserve the elk, a precious resource within the PRNS ecosystem. One example of a conservation walk question we received about tule elk and ranching: "Why don't we see elk here? I came to see elk and all I see are cattle." Management strategies for the elk should benefit the elk, not the ranchers.

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2. Climate Change and Sea Level Rise: Wildlife will bear the brunt of sea level rise. As climate change effects make their inexorable way into PRNS watersheds, they'll inevitably change pastoral zone areas. River otters depend upon intact watersheds with freshwater and wetland habitat, to thrive. How will the Park deal with conflicts due to climate change among ranchers, wildlife and natural landscapes?
3. What do you mean by "diversification?" Does it involve intensification of use of the land and water? How can it be consistent with your mandate to ensure non-impairment of park resources, especially habitat value?

In conclusion, river otters' charm and relative ease of viewing provide a truly inspiring resource to support conservation in the PRNS. The fact that they're making an unassisted recovery in the PRNS is a conservation success story. As long as they thrive, the public has an enormous interest in protecting our public lands. Let us please concentrate on the needs of our charismatic megafauna like otters, elk, bobcats, coyote, puma and raptors to support appropriate use of the seashore, rather than old-fashioned and, frankly, unsustainable ranching practices, going forward.

Sincerely,



Megan Isadore,  
Co-Founder and Executive Director  
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