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September 23, 2019

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

RE: Draft EIS/GMPA PRNS and GGNRA

Dear Superintendent Muldoon,

Thank you for the opportunity to submit comments on the Draft Environmental Impact Statement (DEIS) for a General Management Plan Amendment (GMPA) for Point Reyes National Seashore and the North District of Golden Gate National Recreation Area.

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

For eight 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 PRNS at least once a week at up to 10 different sites, and we’ve had abundant opportunity to observe and document changes and conditions that affect the natural resources and visitor experience in the Seashore. The following comments reflect our organizational mission; our understanding of laws and policies relevant to management of NPS lands generally and PRNS in particular; and our dual role as scientists working to understand the ecosystem function of the park’s natural resources, and as members of the public on whose behalf these lands and waters have been entrusted to the care of the National Park Service.

We oppose the NPS Preferred Alternative, Alternative B, because it proposes management actions that are not permissible under NPS Management Policies; that would impair park resources; that would have significant environmental consequences and impacts; and which are incompletely or inadequately

analyzed in the DEIS. In addition, some of the proposed mitigation measures would themselves impair park resources, or have foreseeable consequences which are not adequately analyzed.

Many of the impacts on, and impairment of, park resources stem from the proposed action of allowing diversification of ranching activities. The stated purpose of the proposed action is to allow “ranchers to react to poor forage production years and fluctuations in the economic market.” (DEIS, page 20). Management actions whose purpose is to promote or protect the economic interests of leaseholders are not legitimate because they are fundamentally at odds with the mandates of the Organic Act of 1916, the PRNS enabling legislation, and current NPS Management Policies.

The DEIS does not specify any Need for Action or Desired Condition that would be met by diversification. On the contrary, the DEIS, in Alternatives Considered but Dismissed from Further Analysis, specifies that diversification of livestock to species other than beef and dairy cattle “...would have too great of an environmental impact” if the diversified species were ducks, geese, turkeys, or rabbits. (DEIS, page 60). The adverse effects from those species include “...potential increase in predation; disease or parasites; loss or degradation of habitat; construction of additional infrastructure (e.g. watering facilities, feed storage facilities, and pens); or the need for the use of non-wildlife friendly fencing.” (DEIS, page 60). Those same adverse effects can also be associated with diversification to chickens, sheep, pigs, goats, and even row crops, all of which would be allowed. The DEIS fails to explain how the very same adverse environmental impacts are “too great” on the one hand while on the other they would have no impacts, or impacts that can be adequately mitigated.

Specific significant impacts and foreseeable consequences of diversification not adequately analyzed in the DEIS include:

1. Impairment of Wildlife Resources. The DEIS states that “[m]anagement of any predators associated with new livestock species would not be allowed,” a demonstrably false statement given that the very next sentence says that “[g]uard animals (i.e. dogs, llamas, donkeys) would be allowed...” [DEIS, page 38]. The use of guard animals is a form of predator management. Similarly, the DEIS states that “[m]anagement of any wildlife associated with protection of row crops would not be allowed in the planning area: however, ranchers would be allowed to fence row crops to exclude wildlife.” [DEIS, page 38]. Exclusionary fencing is a form of wildlife management.

Appendix D includes a number of other wildlife and predator management strategies, techniques, and equipment that would be allowed in connection with diversification. These include: parking a vehicle in an area of loss by predation [page D-39] and repellents and frightening devices [page D-39] in addition to exclusionary fencing and guard animals.

Statements that wildlife and predator management will not be allowed in connection with diversification are plainly untrue, and the DEIS does not analyze the significant impacts that the proposed actions will have on park wildlife resources. Predators such as coyotes, bobcats, foxes, and badgers, for example, will have reduced hunting areas and opportunities, and will come into conflict with guard animals. Their movement patterns will be disrupted. The DEIS should analyze these foreseeable significant impacts, and determine if they collectively constitute impairment of park resources. The DEIS should also analyze the cumulative impacts on wildlife of all diversification proposals that are likely to be approved, in addition to the impacts from individual proposals.

2. Impacts on Visitor Use and Enjoyment and Scenic Values. The DEIS notes that diversification activities, including new types of livestock, row crops, new fencing, and other new infrastructure would result in adverse impacts to visitors use and enjoyment opportunities, and to scenic values [DEIS, page 168]. The DEIS does not analyze or mitigate for these impacts, either individually from the various ranches, or cumulatively from all diversification activities that could be approved.

Other impacts not fully analyzed or adequately mitigated for in the Preferred Alternative include:

1. Livestock that escape from ranch boundaries can have significant impacts on sensitive park resources. On numerous occasions over an extended period of years, we have observed, documented, and reported to park management the impacts of cattle in and around Abbotts Lagoon, for example. Cattle that had escaped from ranchlands blocked trails, defecated in and around the lagoon, trampled vegetation, and impeded the movement of wildlife. The Ranch Operating Agreements should contain an explicit provision requiring the ranch operator to retrieve escaped livestock as soon as possible (within 24 hours). Failure to do so should result in the cattle being treated as trespass or feral livestock in accordance with NPS Management Policy 8.6.8.3.
2. The impacts of Development to Support Day Use and Overnight Accommodations are not analyzed or adequately mitigated and may cause impairment of park resources. For example, boat-in camp sites on Schooner Bay [DEIS, page32] foreseeably will have significant impacts on the wilderness area of Drakes Estero, due to trash, human waste, and substantially increased visitor usage, as has happened at boat-in campsites on the west shore of Tomales Bay. Migratory birds and marine mammals will also be negatively affected. The DEIS includes no quantitative or descriptive details of any kind regarding boat-in camping that would allow analysis of, or mitigation for, its impacts. The DEIS also does not explain why within the planning area, the entire shoreline of Drakes Estero, a Congressionally-designated Wilderness, should not be included in the Resource Protection subzone.
3. Impacts to Water Resources are not adequately analyzed because the DEIS contains no meaningful quantitative data on water quality. The DEIS states that "...existing conditions serve as baseline against which the impacts of each action alternative are compared." [DEIS, page 112]. However, the existing conditions are not described in quantitative or detailed manner. Pursuant to NPS Management Policy 4.6.3, NPS must "take all necessary actions to maintain or restore the quality of surface waters and groundwaters within the parks..." Under that standard, if the existing condition of any surface or groundwater in the planning area is impaired, a proposed action alternative should restore water quality, not maintain a baseline impairment. The DEIS is deficient in not identifying existing impairments to water resources.
4. The native tule elk are a park wildlife resource that should only be managed for the benefit and non-impairment of the resource, not for the economic benefit of commercial leaseholders.

The Draft Foundation Document rightly places the current ranching activities within the context of a 5,000-year continuum of human use of the Point Reyes landscape. In contrast, the NPS Preferred Alternative, Alternative B, attempts to put all of the Park's Fundamental Resources and Values squarely in the context of ranching. As a result, the DEIS ignores or glosses over significant impacts that will foreseeably result, individually and cumulatively, from the proposed actions. We recommend that NPS develop and analyze a new alternative that mitigates impacts from current ranching activities, eliminates activities that impair park resources, and does not expand the agricultural activities beyond the present multigenerational ranching and dairying.

Thank you for the opportunity to comment on the Draft Environmental Impact Statement for the GMPA. We look forward to continuing to actively participate in the GMPA process.

Sincerely,

A handwritten signature in cursive script that reads "Megan Isadore".

Megan Isadore,
Co-Founder and Executive Director
River Otter Ecology Project

