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November 30, 2018

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

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

Dear Superintendent Muldoon,

Thank you for the opportunity to submit comments on the Point Reyes National Seashore General Management Plan Amendment (GMPA).

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

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

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

As a general comment, we recognize that NPS intends to continue to authorize beef ranching and dairies at PRNS. The GMPA should make clear that the intention to continue those authorizations is entirely

separate from NPS' mandate to preserve the historic and cultural resources of PRNS. In the Bay Area alone, there are any number of examples of NPS preserving the historic and cultural resource of a park unit without the underlying activities continuing: the jailers and inmates are long gone from Alcatraz; no ammunition is loaded onto ships at Port Chicago; no Nike Missiles defend the Marin Headlands against Soviet bombers. The GMPA should include relevant examples of repurposing park resources while preserving their historical and cultural value.

Our specific comments concern four general topics, as outlined below.

## **1. Wildlife, Habitat, and Other Natural Resource Protection**

Consistent with NPS management policies, the primary goal of the GMPA should be to “preserve and protect the natural resources, processes, systems, and values... [of PRNS]...in an unimpaired condition to perpetuate their inherent integrity...” Toward that goal, the GMPA should establish management guidelines for protecting wildlife, habitat, and ecosystem function. Degraded resources should be restored, and further impairment of resources should be avoided.

In creating these management policies, NPS should ensure that authorized uses within the park, such as beef ranching and dairies, only be continued in a manner and to the extent that they do not constitute impairment of park resources. No agricultural uses beyond beef ranching and dairies, including so-called “diversification” into row crops or livestock other than cattle, should be allowed.

Tule elk herds in the planning area should not be managed for the benefit of agricultural lease holders. Any perceived conflicts between the elk and agricultural operations are of a purely economic nature, and should be treated as such by the GMPA. Damage to fences, interference with agricultural operations, and competition for forage are all fundamentally economic issues that can be addressed through the structure and terms of leases and permits. Under no circumstances should the elk be culled or relocated because of these perceived conflicts.

In contrast, incursion of cattle into areas outside the pastoral lands should not be tolerated. On a number of occasions in recent years we have observed and documented cattle trampling sensitive areas in and around Abbotts Lagoon. While we did not advocate for reducing the size of livestock herds through culling or other means, we did in each instance request that PRNS management address the situation, and in due course without any urgency the cattle were removed from the sensitive areas. This contrast illustrates a fundamental defect in managing park resources: too much deference is given to the interests of the ranch and dairy operators. The GMPA must address and correct this defect.

Production of silage is another issue that affects wildlife. Current levels and methods of silage production should be evaluated and adjusted in order to avoid impacts to nesting birds and other wildlife. Where silage production is allowed, no-till methods practices should be required, and mowing schedules should be strictly regulated.

The GMPA should include development and implementation of Integrated Pest Management plans. Use of pesticides, including rodenticides, with the potential to harm wildlife should not be allowed.

The GMPA should prioritize habitat restoration. Over time, ranching and dairy operations have resulted in degraded and impaired habitats. The GMPA should proactively identify these habitats and describe strategies for restoring them. Information about habitat restoration needs and progress should be readily available to the public.

## **2. Water Quality**

Water quality in the planning area is regulated under the Clean Water Act by NPS and the San Francisco Bay Regional Water Quality Control Board (RWQCB). Some ranch and dairy operations are part of an RWQCB conditional waiver program, and some are regulated directly by NPS. In both cases, evidence of compliance with the relevant legal mandates should be readily available to the public.

## **3. Conservation Framework**

The use of the term “conservation framework” as on page 9 of the GMPA Newsletter is misleading. The framework, as described, is an effort to shoehorn some resource protection measures into an overall management strategy that prioritizes the interests of ranch and dairy operators. The framework should consider what operational limitations are necessary for the ranches and dairies to serve and be subordinate to the overall resource protection goals of PRNS.

## **4. Climate Change**

The effects of climate change on the planning area are reasonably foreseeable and should be accounted for in developing resource management strategies. Species abundance and distribution will likely change, and sensitive habitat areas will shift. The shoreline will move landward due to sea level rise. Ranch and dairy operations may become unviable due to changes in temperature and rainfall. Wilderness areas such as Abbotts Lagoon and Drakes Estero may expand into the pastoral zone. The GMPA should develop strategies now for dealing with these futures changes.

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

Sincerely,

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

Megan Isadore,  
Co-Founder and Executive Director  
415.342.7956

