



November 28, 2018

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

**Subject: Point Reyes National Seashore General Management Plan Amendment — Draft
Environmental Impact Statement Scoping Comments**

Dear Superintendent Muldoon,

Introduction

Thank you for this opportunity to provide comments during this formal scoping phase of the Environmental Impact Statement (EIS) for the Point Reyes National Seashore and Golden Gate National Recreation Area north district (PRNS/GGNRA) General Management Plan Amendment (GMP Amendment). The Marin Conservation League's (MCL) mission since 1934 is to preserve, protect, and enhance Marin's natural assets. In 2015, MCL approved its Agricultural Policy Statement (attached) which includes the following stated goal:

"To continue to support the role Marin's agricultural community plays in maintaining open space, protecting wildlife corridors, managing carbon, preserving a valuable local heritage, and contributing to food security and the local economy."

In accordance with our goals, and consistent with MCL's previous positions and actions regarding agriculture and our mission to conserve Marin's national park assets, we are in full support of the continuation of ranching and dairy production on the PRNS and GGNRA.

Furthermore, MCL's position is consistent with PRNS' enabling legislation and the statutory history that provided for ranching operations to continue within a designated pastoral zone (agricultural properties) and thus ensure that future generations would be able to participate in the parks' working landscapes. This promise was reinforced by a 2012 directive from then Secretary of the Interior Ken Salazar, offering 20-year leases to the multi-generational ranching families.

In sum, MCL "...holds that there is a direct and mutually supportive connection between the GMP amendment and our agricultural policy and seek to partner with the National Park Service (NPS) and the farm families on the Seashore to realize this connection" as stated in our letter dated November 13, 2017 (attached for inclusion in the administrative record with this letter providing MCL's specific comments for EIS analysis of the proposed action and alternatives presented in the EIS NOI materials).

MCL also believes that a robust analysis under the National Environmental Policy Act (NEPA) of all alternatives in the GMP Amendment, including those required by a legal settlement, will enable NPS

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to understand and evaluate the possible mitigation and management measures that could improve the environmental sustainability of the ranches and dairies, and inform a broad range of land management policies and decisions, including lease/special use permit succession planning, elk management, visitor access, and conservation practices to protect natural and cultural resources, coastal rangeland, and water and soil quality, among others.

At this time, NPS is seeking comments on what topics should be analyzed in the EIS, as well as on potential refinements to the proposed action and other alternatives. MCL offers the following comments regarding the scope of issues that the EIS should address.

Specific Comments

Visitor capacity, access, and circulation

- The EIS should evaluate visitor shuttle models that relieve congestion and parking constraints. Shuttle service could also contribute to a stronger visitor experience with PRNS/GGNRA by getting visitors out of their automobiles. This could also serve to mitigate environmental impacts by reducing vehicle traffic, idling time (emissions) resulting from congestion, etc. Examples and models are in operation throughout the National Park system that achieve these objectives.
- The EIS should analyze annual, seasonal, peak-day, and daily visitor volumes that can be effectively supported by PRNS staffing and infrastructure resources. MCL views this GMP Amendment and EIS as an opportunity to explore and implement a variety of tools for visitor access and participation. MCL is supportive of many of the “elements common to all action alternatives” but believes they should be based upon a complete understanding of visitor capacity in the planning area to be evaluated in the draft EIS.
- The EIS should, for each alternative analyzed, identify and consider integrated resource management and visitor access solutions that address shared issues and provide solutions across the proposed planning area and surrounding region. Examples include “loop routes, connectivity with adjacent public lands, and facilitation of north-south connectivity across the landscape.” This is also the case for issues like vegetation and fire management and the conflicts posed by the free-ranging elk. A visitor’s experience at PRNS inevitably crosses the boundary between portions of PRNS inside and outside the GMP Amendment planning area. These solutions should be holistic and comprehensive, recognizing the visitor and resource connections and relationships that exist across the proposed planning area boundary.

Ecological buffers and natural resource protections and

- The EIS should identify new infrastructure (e.g. fencing among others) required to create ecological buffers identified for all the alternatives, as well as plans for the long-term maintenance of new and existing buffer infrastructure. The concept of buffers is, on its face, one that MCL supports. While all ranches require infrastructure in place to protect sensitive resources, including rare and endangered plant and wildlife species, proposed buffers should be situated strategically to protect sensitive resources, but in ways that do not overly impact any single ranch. Additionally, significant consideration should be given to buffers that have already been put in place and not formally named. Management objectives and requirements of these buffers should be addressed, including the avoidance of undesirable invasive plant species and the unintended consequence of disrupting native plant communities and harming sensitive species that depend on a grazing regime for survival.
- The EIS should account for environmental benefits and protections provided by previously implemented best management practices (BMPs) and additional benefits derived by to-be implemented BMPs. Specifically, the EIS should describe the management measures that NPS staff and the ranch-

ers are currently using and plan to use to safeguard and provide continued, needed improvements to water quality. These practices represent the multi-objective solutions critical to achieving NPS goals and mandates for the PRNS/ GGNRA. They are also the primary means for compliance with federal and state environmental regulations for respective Grazing Lands and Dairy Conditional Waivers for Waste Discharge Requirements approved and implemented by the San Francisco Regional Water Quality Control Board. These require that NPS staff and ranchers evaluate potential impacts to surface and groundwater from grazing livestock and manure management and implement practices that mitigate those impacts.

- The EIS should consider a transparent and rancher participatory process, using the best available information and science to develop the Conservation Framework and the Land Management Units. The NPS proposes applying this basic zoning framework of core, pasture, and rangeland zones to all action alternatives that include ranching, in order to streamline the permitting process [for ranchers and NPS staff] and provide consistent guidance to ranch operators while ensuring the protection of natural and cultural resources. The EIS also should consider as an alternative, whole ranch conservation and carbon farm planning methods already used to achieve integrated soil and water conservation on grazing livestock ranches and dairy farms. The impetus and opportunity with these methods is to use tools and approaches that facilitate consistency in conservation practices to identify and address resource problems and realize land management opportunities that might cross any proposed LMU boundaries or become evident after the GMP is completed.
- The EIS should comprehensively analyze both Green House Gas (GHG) emission reduction and offset strategies that can be implemented through all sectors across the planning area, including on PRNS/ GGNRA farms and ranches (e.g., carbon sequestration management practices). MCL, consistent with the State of California and beyond, is committed to finding solutions for climate change, including GHG emission reductions. Through its Climate Action Working Group, MCL has worked with the County of Marin and other stakeholders to develop (by commenting on) a relevant Climate Action Plan (CAP)¹ for Marin in response to California Assembly Bill 32. The Marin CAP provides an accurate inventory of GHG emissions for Marin County (including 5% from agriculture) that is consistent with California and United States inventories. Furthermore, the Marin CAP recognizes that agriculture, through conservation practices and by serving as a carbon sink, can offset emissions and make a significant contribution to obtaining Marin CAP GHG emission reduction objectives. The potential for a positive net change in agricultural carbon flux on the ranches and dairies over the range of alternatives should be estimated.

Elk management

- The evaluation of elk management options should recognize the variability in scale of conflict between grazing livestock beef ranches and dairy farms. The EIS should analyze a full range of management methods, either individual or in some combination of methods and including separation, that respond to and reflect these differences to effectively relieve those conflicts.

Nexus of agriculture and resource management

- The EIS should also describe how NPS could benefit public knowledge of historic districts and ongoing ranching in the park by engaging ranchers and other partners in interpreting the agricultural story within the planning area and its connections outside the planning area. This EIS analysis point is also relevant to visitor experience.

¹ Marin Climate Action Plan Update 2015 - https://www.marincounty.org/~media/files/departments/cd/planning/sustainability/climate-and-adaptation/execsummarymarincapupdate_final_20150731.pdf

- The EIS should thoroughly analyze how the maximum allocation of land to grazing livestock and dairy farming provides needed on-the-ground resource management that might otherwise be beyond the capacity of NPS and how it achieves the cultural and natural resource preservation and management objectives of the NPS for PRNS and GGNRA.
- The EIS should analyze the role farm families provide as partners in resource and infrastructure management in the face of decreasing NPS budgets and resources to do the same. This important long-term socioeconomic effect should be compared in the EIS's evaluation of various alternatives, especially those that would severely limit or eliminate ranching.

Lease length and succession

- The EIS should evaluate options for lease continuation beyond the proposed 20-year term in the proposed action. This includes preparing the process and detailing a plan for lease renewal in advance of the proposed 20-year leases expiring. Lease length is directly related to the strength and viability of farming and ranching operations. Long leases promote long-term viability of ranching operations by providing the ability to reliably forecast economic costs and returns. This includes investments in infrastructure upkeep, natural resource management, maintenance of healthy water and air quality, and assurances of farm employees' welfare. The proposed 20-year leases are a good first step to create this environment for success. Longer leases would contribute even greater confidence and stability. The EIS should thoroughly analyze longer term leases and the potential benefits that may be gained in environmental and socioeconomic effects. The EIS should also describe methods for how the proposed 20-year leases could serve a longer time period (e.g., perhaps through 5-year incremental extensions). In the event that a ranch succession plan anticipates that there will be no family successor in future years, the EIS should also analyze alternatives and recommend a process for determining a successor or other options that would either continue, discontinue, or modify agricultural operations on that ranch.

Socioeconomics

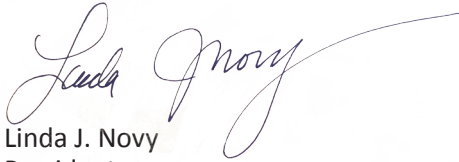
- The EIS should analyze the socioeconomic benefits that the ranching operations on PRNS and GGNRA provide to West Marin and Marin-Sonoma communities, including employment, school enrollment, and support industries. Agriculture on the PRNS/GGNRA represents about 19% of the areal extent and 19% of total production in Marin County. Per the 2017 Marin County Crop Report, total gross production value was \$89 M. Accordingly, the contribution of PRNS/GGNRA agricultural production to total county production is \$17M. This does not include multiplier effects through processing and value-added production, which can be 3 to 4 times that amount, resulting in a value of about \$68M. In terms of employment, every on-farm job is matched by 3 to 4 jobs in other off-farm related agricultural businesses. In 2012, Marin County employed 1,072 farm employees (USDA 2012 Ag. Census) resulting in as much as 4,288 off-farm jobs. PRNS/GGNRA's contribution to on-farm employment is 204 employees and a corresponding 815 off-farm employees. The EIS should analyze the impact of potential loss of \$73.2 M in annual production, and as many as 1,019 jobs on the community and the region.

Conclusion

MCL played a significant role in the initial legislative establishment of both PRNS and GGNRA and has supported them for decades as incomparable public assets that provide experiences in wilderness and natural lands, recreation, and working landscapes. MCL has also enjoyed a long, successful, and rewarding relationship with Marin's multi-generational agricultural community whose voluntary sale of their land to the NPS made it possible for both PRNS and GGNRA to realize the shared goal of protecting an open and connected landscape from significant development that could have decimated that landscape. The success of this relationship is a working landscape within the two national parks and beyond, with

strong community ties, a contributing economy, connected landscapes and protected natural ecosystems.

Respectfully,

A handwritten signature in cursive script, reading "Linda J. Novy". The signature is written in dark ink and is positioned above the printed name and title.

Linda J. Novy
President

Attachments: Marin Conservation League Agricultural Policy Statement, Marin Conservation League Scoping Comment Letter dated November 13, 2017

Marin Conservation League Agriculture Policy Statement

OVERVIEW

Two hundred and fifty-five families operate Marin County's farms and ranches. Most of these are multi-generational ranches with annual gross incomes of less than \$100,000.00 and an average size of 600 acres. These ranches are located on 167,000 acres of hilly grassland and mixed oak woodland in rural Marin County. Included in this number are at least 28,000 acres of ranchland in the Golden Gate National Recreation Area and Point Reyes National Seashore, which are subject to federal jurisdiction.

The most productive use of the great majority of Marin's agricultural land is livestock grazing. Relatively dry and cool marine climatic conditions along with steep rolling hills and relatively little water are defining factors. An exception is the less than 1% of prime land, which is suitable for row cropping.

Agriculture is one of the ten major business ventures in Marin, and therefore valued as a critical element in supporting Marin's economy. Flexibility and diversification over the last 30 years have enabled agriculture to remain economically viable. Where conventional milk and beef production were the foundation of the Marin agricultural economy for many decades, now value-added and specialty products and services augment the base. For example, grass-fed beef, pastured poultry and eggs, on-farm cheese-making and small-scale organic row and tree cropping, as well as bed and breakfast accommodations, are some of the newer agricultural ventures contributing to the agricultural economy. Organic milk production accounts for more than 40,000 acres being in organic certification, far above state and national rates. The purchase of conservation easements by the Marin Agricultural Land Trust (MALT) has helped about half of the ranch operations to stay in business.

On-going threats to Marin's agricultural community remain much as they have been in the past: skyrocketing property values, which encourages urbanization, family succession challenges, invasive plants, and, more recently, uncertain climate and rainfall conditions. Along with A-60 zoning, supportive Countywide Plan policies, and

strong Coastal Zone protections, the purchase of conservation easements by the Marin Agricultural Land Trust and enrollment in the Williamson and Super Williamson Acts has helped stay the hand of developers and estate ranchers. Ninety percent of Marin's ranches are protected in this way.

The vast majority of ranches and farms are generational family enterprises, which has effectively raised sustainable standards and made owners better guardians of the land. As stated in the Land Use Plan (p. 12, 3rd para.) of the Local Coastal Plan, and adopted by the Marin Board of Supervisors, "More than 85% of Marin farms had between one and four family members involved in their operation, and 71% had a family member interested in continuing ranching or farming."

Marin's ranchers have demonstrated a high level of voluntary participation in beneficial conservation practices over the past 30 years. Implementation of conservation practices has improved water quality, created wildlife habitat, prevented soil loss and sequestered carbon. More than 25 miles of creeks have been restored and more than 650,000 cubic yards of sediment have been kept out of creeks and the bay. Marin's ranches, with their extensive grasslands and forests, are expected to help Marin County reach its Climate Action Plan goals. Ranchers are supported in their conservation practices by a suite of strong federal and state laws, standards, and regulations and effective county policies and code, all designed to protect environmental resources on agricultural lands.

STATED GOAL

To continue to support the role Marin's agricultural community plays in maintaining open space, protecting wildlife corridors, managing carbon, preserving a valuable local heritage, and contributing to food security and the local economy. This statement is consistent with MCL's previous positions and actions regarding agriculture.

POLICY

As approved by the Board of Directors on November 17, 2015

Following are policy statements that specify and clarify Marin Conservation League's goals and concerns.

Natural Resources Management:

1. Support sustainable management of grassland and rangeland, which provides critical forage for livestock, while fostering wildlife habitat and preserving native plants.
2. Support soil management practices that lead to increased water-holding capacity and an increase in organic matter in the soil.
3. Support soil management practices such as the use of the “no-till drill”, which minimize soil disturbance, prevent soil loss and reduce the flow of sediment into streams, bays and the ocean.
4. Encourage the alignment of local conservation programs and practices with the goals of the Healthy Soils Initiative as described on the California Department of Food and Agriculture website.
5. Support development restrictions within 100 feet or more of wetlands and stream conservation areas, as defined in the Countywide Plan (BIO-3.1 and 4.1) to protect wetland and stream habitats.
6. Support the management of invasive plants through Integrated Pest Management, including chemical measures, where other control measures are infeasible or ineffective.
7. Support the federal Clean Water Act 1974 and Endangered Species Act 1973, and California's Porter-Cologne Act of 1969 because of their broad powers in protecting natural resources.
8. Encourage those conservation practices that reduce the delivery of pathogens, sediment, mercury and nutrients to our waterways and all bodies of water.
9. Promote the efficient use and reuse of water on farms and ranches to meet their

agricultural needs. Maintain water infrastructure, and if old sources become insufficient, consider developing new sources of water only if adverse environmental impacts can be avoided.

10. Support carbon farm planning and implementation of the United States Department of Agriculture's Natural Resource Conservation Service's carbon-beneficial practices.

11. Support assisted ranch management planning and cost-share implementation of best management practices, rather than depend principally on enforcement to attain compliance with environmental regulations.

12. Encourage efficient energy management and the production of renewable energy resources on and for individual ranches, such as wind, solar and methane digestion, where adverse environmental impacts can be avoided.

13. Discourage the development of large wind and solar "farms" on agricultural lands for commercial purposes, due to energy production inefficiencies, installation and transmission impacts, visual impacts such as disharmony of scale and inconsistency with rural character, and environmental impacts such as wildlife and habitat degradation.

14. Encourage greenhouse gas reduction and climate adaptation practices, as described in the U. S. Department of Agriculture's "GHG and Carbon Sequestration Ranking Tool."

Partnering Agencies:

15. Support the Grazing and Dairy Permit Waiver Programs of the Regional Water Quality Control Board.

16. Support funding and technical support to farmers and ranchers seeking to improve water quality and fisheries habitat.

17. Support national, state, local, and private funding for conservation implementation programs through Marin Resource Conservation District, Marin Agricultural Land Trust, and Natural Resources Conservation Service.

18. Support landowner education and permitting facilitation through county-

funded positions, such as the Marin Resource Conservation District's Stream Coordinator position and the University of California Cooperative Extension's Agricultural Ombudsman position.

19. Encourage the County to control invasive plants on County rights of way and on open space preserves, to prevent invasives from spreading onto ranchland.
20. Support coordination programs between permitting agencies, such as the Marin Resource Conservation District's Coastal Permit Coordination Program, which bundles permit requirements over several agencies to promote efficiencies and to reduce the financial burden on agencies and landowners.
21. Support the inclusion of the Local Coastal Program permitting requirements in the recertification of the Marin Resource Conservation District's Coastal Permit Coordination Program.
22. Endorse the role of Marin Agricultural Land Trust, Marin Resource Conservation District, the Natural Resources Conservation Service, the Ag Institute of Marin, the Marin Dept. of Agriculture, the Marin Community Development Agency and the University of California Cooperative Extension Service, the Regional Water Quality Control Board, and the California Department of Fish and Wildlife in preserving and protecting Marin County's agricultural heritage and natural resources, and supporting the best management practices which foster long range productivity and environmental protection.

Zoning and Land use:

23. Support a "critical mass" of agricultural production (e.g., sufficient number of dairies, acres of beef production, small-scale crops, etc.) needed to maintain the demand for goods and services that are necessary to support a viable agricultural economy in Marin County.
24. Balance ranchers' desire for flexibility in cropping decisions with the need to not exceed impact thresholds or standards for grading quantities (e.g., terracing), irrigation, and setbacks from streams, wetlands, and other sensitive resources.
25. Support Marin Countywide Plan and Coastal Zone policies that limit residential

development on agriculturally zoned land, and limit the size of farm residences.

26. Limit development of farm dwellings and ancillary structures to clusters within 5% or less of total ranch acreage. (See Marin Countywide Plan AG-1.6).

27. To facilitate intergenerational succession on family farms in the Coastal Zone, support up to two dwellings in addition to the farmhouse per “farm tract” (defined as all contiguous lots under common ownership), as conditioned in the Land Use Plan of the Local Coastal Program, adopted August 25, 2015 by the Board of Supervisors.[\[i\]](#)

28. Support affordable, safe and healthy housing for Marin’s largely permanent farm workforce both on-farm and in nearby villages.

29. Support policies, programs and zoning that restrict subdivision of agricultural lands by requiring demonstration that longterm productivity of agricultural on each parcel created would be enhanced. (See Marin Countywide Plan AG-1.5).

30. Maintain a minimum A-60 zoning, as it has been instrumental in protecting agriculture, maintaining open space values, and preserving the rural character of West Marin.

31. Support the County of Marin’s Affirmative Agricultural Easement Program and MALT’s Mandatory Agricultural Easement Program, which are listed in the LUP of the LCP as a program to evaluate: Program C-AG-2b Option to Secure Affirmative Agricultural Easements Through Restricted Residences...etc.

32. Support small-scale diversification and value-added production (such as cheese production), and services (such as bed-and-breakfast or non-profit farm tours) consistent with County policy and code, where adverse environmental impacts can be avoided.

33. Balance development of new retail farmstands with the need to protect viewsheds and safety on Highway One.

34. Encourage internet capacity expansion in the rural areas of Marin, avoiding negative visual impacts to ridgelines and viewsheds.

35. Discourage expansion of vineyards due to their negative impacts on soils, water quantity and quality, and wildlife habitat.

36. Support prohibition of incompatible and environmentally damaging recreational uses, such as motorcycle riding and off-road biking, on agriculturally zoned land.

37. Encourage the restoration of traditional and iconic ranch structures, such as wooden barns and outbuildings, to maintain the cultural landscape of agriculture in West Marin.

Footnote to Item #27 _____

[1] Excerpted from Land Use Plan policies C-AG-5 A. and AG-7, agricultural dwelling units, including intergenerational housing, may be permitted in C-APZ zoning districts, subject to the following conditions: dwelling units must be owned by a farmer or operator actively engaged in agricultural use of the property; no more than a combined total of 7,000 square feet (plus 540 square feet of garage space and 500 square feet of agricultural-related office space) may be permitted per farm tract; intergenerational farm homes may only be occupied by persons authorized by the farm owner or operator; a density of at least 60 acres per unit shall be required for each farmhouse and intergenerational house (i.e., at least 180 acres required for a farmhouse and two intergenerational homes); no more than 27 intergenerational homes may be allowed in the County's coastal zone; permitted development shall have no significant adverse impacts on environmental quality or natural habitats; all dwellings shall be placed within a clustered development area; and development shall be sited to minimize impacts on coastal resources and adjacent agricultural operations.

References:

Three Essential Documents:

1. 2007 Marin Countywide Plan

<http://www.marincounty.org/depts/cd/divisions/planning/2007-marin-countywide-plan>

2. Development Code (aka Zoning Ordinance)

https://www.municode.com/library/ca/marin_county/codes/code_of_ordinances?nodeId=TIT22DECO

3. Zoning Maps*

(<http://www.marinmap.org/Html5Viewer/Index.html?viewer=mmdataviewer>)

* MarinMap serves up County geographic data including Zoning. There doesn't seem to be a free-standing Zoning Map accessible on the web. The *MarinMap* screen shot *County Zoning* document provides a generalized picture of the Zoning, and a *MarinMap Viewer* set to Zoning can be used on the above website with the "Layers" toggled on or off as shown to get more refined information.

Hart, J. 1991. *Farming on the Edge: Saving Family Farms in Marin County, California*. University of California Press. Berkeley, CA. 174 pgs.

ICF International. 2015. *Marin County Climate Action Plan (2015 Update)*. July. (ICF 00464.13.) San Francisco. Prepared For Marin County, California.

Marin County Department of Agriculture. 2015. *2014 Marin County Livestock & Crop Report*. Marin County Department of Agriculture. Novato, California. 8 pgs.

Marin Economic Forum. 2004. *Marin County Targeted Industries Study*. Prepared for the Marin Economic Forum and The Community Development Agency by Economic Competiveness Group, Inc. San Rafael, CA. 22 pgs.

NRCS. 2015a. *Comet-Planner: Carbon and Greenhouse Gas Evaluation for NRCS Conservation Practice Planning*. USDA Natural Resources Conservation Service and Colorado State University. <http://www.comet-planner.com/>.

NRCS. 2015b. *Practice Standards for Greenhouse Gas Emission Reduction and Carbon Sequestration*. USDA Natural Resources Conservation Service. <http://www.nrcs.usda.gov/wps/portal/nrcs/detailfull/national/air/?cid=stelprdb1044982>.

SFRWQCB. 2013. *Renewal of Conditional Waiver of Waste Discharge Requirements for Grazing Operations in the Tomales Bay Watershed*. Resolution Order No. R2-2013-0039. Oakland, CA. 20 pgs.

SFRWQCB. 2015. *Renewal of Conditional Waiver of Waste Discharge Requirements for Existing Dairies within the San Francisco Bay Region*. Resolution Order No. R2-2015-0031. Oakland, CA. 19 pgs.



November 13, 2017

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

Subject: First Phase Comments for the Point Reyes National Seashore General Management Plan Amendment

Dear Acting Superintendent MacLeod,

Introduction

Thank you for this opportunity to provide comments during the first phase of the Point Reyes National Seashore and Golden Gate National Recreation Area north district (PRNS/GGNRA) General Management Plan Amendment (GMP Amendment) planning process. The Marin Conservation League's mission since 1934 is to preserve, protect, and enhance Marin's natural assets. In 2015, MCL approved its Agricultural Policy Statement (attached) which includes the following stated goal:

“To continue to support the role Marin's agricultural community plays in maintaining open space, protecting wildlife corridors, managing carbon, preserving a valuable local heritage, and contributing to food security and the local economy.”

In accordance with our goal, and consistent with MCL's previous positions and actions regarding agriculture and our mission to conserve Marin's national park assets, we are in full support of the continuation of ranching and dairy production on the PRNS and GGNRA. We hold that there is a direct and mutually supportive connection between the GMP amendment and our agricultural policy and seek to partner with the National Park Service and the farm families on the Seashore to realize this connection. We further hold the GMP Amendment as a timely opportunity for NPS, working with the ranchers who have managed the land for generations and Marin partners, to lead the nation again by providing a solution that achieves the multiple objectives society holds for safeguarding the unique natural resources as well as the working landscape within the Seashore.

Specific Comments

We offer the following specific comments as initial considerations and recommendations for issue identification and the refinement and analysis of alternatives during the GMP Amendment planning

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process and environmental review under the National Environmental Policy Act (NEPA). MCL will continue to participate in the GMP Amendment planning and review processes during coming years.

Land Allocation

Ranching and dairy farming should continue in the pastoral area on the greatest acreage possible as originally authorized. This will provide the best opportunity for each ranch to remain viable, assure the continued contribution of agricultural production on the Seashore to the local community and economy, and meet the larger goal of preserving this cultural and historic resource in the park. Additionally, any conversion of land from agricultural management by a farm family to alternative land uses would increase the management demands upon NPS staff which, in the face of a proposed 13% budget cut, would be difficult to provide.

Each of the three settlement-required alternatives represents real risks and compromises to these objectives. The six PRNS dairies represent 20% of the total number of dairies in Marin County and they ship to local processors such as Clover Sonoma and Straus Family Creamery. Removing them as proposed in the “No Dairy Ranching” alternative would eliminate an irreplaceable source of milk for the Marin-Sonoma milk shed, and would compromise this cultural use and landscape in both counties. The “No Ranching” alternative, in itself, acknowledges the ecosystem management role played by grazing livestock, with the point “...NPS may coordinate prescriptive grazing in high priority areas to maintain native and rare plant communities.” The proposed removal of 7,500 acres in the “Reduced Ranching” alternative would result in at least ten existing ranches being eliminated. The Environmental Impact Statement (EIS) should thoroughly analyze how the maximum allocation of land to grazing livestock and dairy farming provides needed on-the-ground resource management that might otherwise be beyond the capacity of NPS; how it maintains the contributions made to the strength of regional and local economy; and how it successfully achieves the cultural and natural resource preservation and management objectives of the NPS for PRNS and GGNRA.

The concept of buffers is, on its face, one that MCL supports. Buffers should be situated strategically to protect sensitive resources, but in ways that do not overly impact any single ranch. Additionally, significant consideration should be given to buffers that have already been put in place and not formally named. Management requirements of these buffers should be addressed, including the avoidance of undesirable invasive plant species and the unintended consequence of disrupting plant community structures and harming sensitive species that depend on a grazing regime for survival.

Leases

Lease length is directly related to the strength and viability of farming and ranching operations. Long leases promote long-term viability of ranching operations by providing the ability to reliably forecast economic costs and returns. This includes investments in infrastructure upkeep, natural resource management, maintenance of healthy water and air quality, and assurances of farm employees’ welfare. The proposed 20-year leases are a good first step to create this environment for success. Longer leases would contribute even greater confidence and stability. When structur-

ing leases, NPS should give consideration to these points, and also describe methods for how the proposed 20-year leases could serve a longer time period (e.g., perhaps through 5-year incremental extensions). For example, when a lease runs for five years, the lease should be extended for another 20 years so that the ranchers will have the “long term equity” to support their infrastructure upkeep, resource management, farm work force and necessary viable financing opportunities.

Elk

Significant conflicts exist between some of the free-ranging tule elk and some of the ranches at PRNS. We recognize that long-term management solutions to these conflicts, as well as other issues associated with the elk herds (e.g., Johne’s disease), must be found. The elk and agricultural operations are both valuable resources at PRNS, and a management solution that would provide a level of co-existence acceptable to the affected ranches would be ideal. MCL recognizes that this ideal may be difficult and/or costly to achieve. The six alternatives presented to the public to date have options for addressing the issue that essentially range from “management” in one form or another to “removal” of one or more of the free-range elk herds.

NPS has indicated that it intends to analyze this issue carefully with qualified resource management professionals. MCL supports NPS in this approach. We look forward to seeing the results of this analysis and will comment on a preferred management approach once those results are available, hopefully in the Draft EIS.

Park Resources and Visitor Carrying Capacity

Much can be done to improve the PRNS/GGNRA visitor experience. Fundamental to this is an analysis of the annual, seasonal, peak-day, and even daily visitor volume that can be effectively supported by PRNS staffing and infrastructure resources. MCL views this GMP Amendment and EIS as an opportunity to explore and implement a variety of tools for visitor access and participation. Specifically, the EIS should examine visitor shuttle models that relieve congestion and parking constraints. This would contribute to a stronger visitor experience with PRNS/GGNRA by getting visitors out of their automobiles. This could also serve to mitigate environmental impacts by reducing vehicle traffic, idling time (emissions) resulting from congestion, etc. Examples and models are in operation throughout the NPS that achieve these objectives, so this is an important topic to evaluate in the EIS.

Similarly, a visitor’s experience and participation at PRNS inevitably crosses the boundary between portions of PRNS inside and outside the GMP Amendment planning area. This is also the case for the conflict posed by the free-ranging elk. MCL recommends that the alternatives identify and consider integrated resource management solutions that also apply to regions outside the proposed planning area. These solutions would be more holistic and comprehensive, and would recognize the inherent visitor and resource connections and relationships that exist across the proposed planning area boundary.

Visitor Access and Experience

Coupled with our suggestions for Park Resources and Visitor Carrying Capacity, MCL supports

enhancing visitor experience through the GMP Amendment. One specific option MCL recommends that the NPS explore is the growth of the trail network in the planning area. This could be implemented along the boundaries between ranch operations, and could include relevant cultural, historical, and natural interpretive information (e.g., brochures, audio tours, signage). Visitor experience would be expanded by providing access to selected portions of the pastoral area, and be made richer by the opportunity to learn about PRNS agriculture, its history, and the names and faces of the ranching community that continues the traditional historic “family farms” of the past — a tradition across the nation that is increasingly threatened by much larger “industrial agriculture” operations.

Another potential way to enhance visitor experience with respect to the ranching operations would be to consider some form of “ranching and farming tours” that would be available to the public. This could foster a better understanding of how ranching compatibly contributes to PRNS, NPS’s mission for managing PRNS, the regional economy, and how the operations are managed to protect the natural environment of PRNS. MCL recommends that this be explored and analyzed in the GMP Amendment and EIS.

Cultural and Historic Resources

The PRNS/GGNRA are unique among national park units in that they have successfully implemented the integration of a pastoral landscape and its active ranching traditions with large areas of natural landscape and wilderness. The cultural and historic resource that has been preserved in PRNS/GGNRA is the combination of the historic pastoral landscape and the multi-generational farm families that are managing them. These local community members are the most direct link and now, four and five generations later, are the legacy of the historic period of ranching and farming on the Point Reyes Peninsula which dates back to the mid 1800s. The working landscapes they manage exemplify and manifest the national movement to strengthen local food systems and community agriculture. They are leaders in grass-fed and organic production. At the same time, they have contributed to maintaining the ecological richness that is the hallmark of PRNS/GGNRA and must comply with stringent state and federal environmental regulations. MCL recommends that the NPS, through the GMP Amendment and EIS process, recognizes this connection to historic agricultural operations, and describes the innovations in agricultural and resource management practices that are unique to the PRNS/GGNRA. These historic agricultural operations represent a tremendous resource and exceptional educational opportunity to the public. The environmental, cultural, educational, and economic benefits they bring to PRNS/GGNRA support NPS’s mission for this area, and should be fully addressed and documented in the EIS.

Community and Agricultural Economy

Agriculture on the PRNS/GGNRA represents about 19% of the areal extent and 19% of total production in Marin County. Per the 2016 Marin County Crop Report, total gross production value was \$96.5 M. Accordingly, the contribution of PRNS/GGNRA agricultural production to total county production is \$18.3M. This does not include multiplier effects through processing and value-added production, which can be 3 to 4 times that amount, resulting in a value of about \$73.2M.

In terms of employment, every on-farm job is matched by 3 to 4 jobs in other off-farm related agricultural businesses. In 2012, Marin County employed 1,072 farm employees (USDA 2012 Ag. Census) resulting in as much as 4,288 off-farm jobs. PRNS/GGNRA's contribution to on-farm employment is 204 employees and a corresponding 815 off-farm employees. The loss of \$73.2 M in annual production, and as many as 1,019 jobs, would be devastating to the agricultural community and the region as a whole. MCL asks that, in analyzing alternatives for the GMP Amendment, full consideration be given to the impacts each proposed alternative would have to this significant contribution to the local and regional economy. Proactively, we recommend that these benefits be referenced, as appropriate, in NPS's "purpose and need" statement for the GMP Amendment.

Sustainable Agriculture and Regulatory Compliance

The ranchers on PRNS/GGNRA rangelands and dairies are dedicated to achieving the synergy of working landscapes and environmental resource stewardship. To that end, they must comply with some of the most stringent and all-encompassing water quality management regulations for agricultural nonpoint source pollution in the United States. Two specific examples of federal and state environmental regulations are the respective Grazing Lands and Dairy Conditional Waivers for Waste Discharge Requirements approved and implemented by the San Francisco Regional Water Quality Control Board. In both cases, the agricultural manager must evaluate potential impacts to surface and groundwater from grazing livestock and manure management, and implement practices that mitigate those impacts. The EIS should describe the management measures that NPS staff and the ranchers are using to safeguard water quality. These include programs such as the US Environmental Protection Agency's 319(H) water quality grants, partnering with the Marin Resource Conservation District on other funding opportunities, and cost-share contributions from the individual ranchers and farmers. These implemented practices are providing the intended benefit and protections and represent the multi-objective solutions critical to achieving NPS goals and mandates for the PRNS/ GGNRA.

MCL, consistent with the State of California and beyond, is deeply concerned and committed to finding solutions for climate change, including greenhouse gas (GHG) emission reductions. Through its Climate Action Work Group, MCL has worked closely with the County of Marin and other stakeholders to develop a relevant Climate Action Plan (CAP) for Marin in response to California Assembly Bill 32. The Marin CAP provides an accurate inventory of GHG emissions for Marin County, including 5% from agriculture that is consistent with California and United States inventories. Furthermore, the Marin CAP recognizes the potential that agriculture represents, through conservation practices, to be a net sink of carbon and provide offsets that make significant contributions to obtaining Marin CAP GHG emission reduction objectives. To this end, the Marin County Board of Supervisors recently passed the "Drawdown: Marin" goal. MCL recommends that the GMP Amendment and EIS analyze GHG reduction strategies that can be implemented at agricultural operations on PRNS/GGNRA (e.g., carbon sequestration management practices).

Glossary and Index

We believe the GMP Amendment process would facilitate better community participation through the inclusion of a glossary of terms in the Draft EIS. Examples include but are not limited to terms

like operational flexibility, carrying capacity, and visitor experience.

As described in the NPS NEPA Handbook (2015, page 95), we assume that an index will be included in the Draft EIS. MCL supports this and believes it would make it easier for the public to quickly find where specific topics are discussed.

Conclusion

MCL played a significant role in the initial establishment of both PRNS and GGNRA and has supported them for decades as incomparable public assets. MCL has also enjoyed a long, successful, and rewarding relationship with Marin's agricultural community that united with the NPS to realize the shared goal of protecting an open and connected landscape from significant residential development that could have decimated that landscape. The success of this relationship, a working landscape with strong community ties, economy, and connected landscapes and ecosystems, is a model that has been studied in an attempt to replicate it nationally. Those original benefits and achieved goals are being multiplied forward through new, unforeseen benefits such as the opportunity for a vibrant local food system and provision of climate change solutions, among other ecosystem services. These are ideals held and pursued throughout California and nationally. They are already being realized in Marin County, including on the PRNS/GGNRA ranches and farms.

The GMP Amendment process is a timely opportunity to again embrace the purpose and intent of preserving ecosystems and protecting working landscapes and the families that manage them because of the dividends this will pay going forward for the environment and community. MCL recommends that an alternative be considered and thoroughly analyzed in the EIS that embraces these mutual and integrated benefits, and reflects our comments above to continue PRNS/GGNRA ranching and dairy farming.

Thank you for considering these comments.

Respectfully,



Kate Powers
President

Attachments: Marin Conservation League Agricultural Policy Statement