

September 23, 2019

GMPA  
c/o Superintendent Cecily Muldoon  
Point Reyes National Seashore  
1 Bear Valley Road  
Point Reyes Station, CA 94956

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

Dear Superintendent Muldoon:

### Introduction

Thank you for this opportunity to provide comments on the Draft Environmental Impact Statement (DEIS) for the Point Reyes National Seashore and Golden Gate National Recreation Area North District (PRNS/GGNRA) General Management Plan Amendment (GMPA). Marin Conservation League (MCL) compliments the National Park Service's (NPS) authors on a well-organized and presented DEIS.

The mission of MCL since 1934 has been to preserve, protect, and enhance Marin's natural assets. In accordance with MCL's mission and goals, our comments are based upon the following assumptions and principles:

- Since its founding 85 years ago, MCL has been instrumental in setting aside many of Marin's most valuable lands for the public and has served as guardian of their unique resources for the enjoyment of future generations. In that spirit, MCL is committed to protecting the diverse flora and fauna, sensitive and endangered species, geology, culture and history, and scenic resources of PRNS from unacceptable impact.
- MCL has also long recognized the valuable contributions of Marin's historic agricultural community toward preserving open space in the County. This includes the successful and precedent-setting minimum parcel size limits established in 1970<sup>1</sup>, referred to as A-60<sup>2</sup> in Marin County's zoning code. It also includes the willing sales of ranches that were instrumental in forming PRNS/GGNRA and, specifically, the planning area for this GMPA and DEIS;
- The capacity of working farms and ranches to protect west Marin's open and connected landscape, including the ranches in PRNS and the North District of GGNRA, requires a critical mass of land area and operating farms to remain viable<sup>3</sup>; and
- A comprehensive understanding of the purpose, goals, and management objectives for PRNS/GGNRA that are reflected in the enabling legislation<sup>4</sup> and that uniquely establish an historic agricultural landscape, including the grazing livestock ranches and dairy farms within the GMPA area, as culturally significant resources within PRNS

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1. Farming on the Edge, Chapters 2, 3, and 4, by John Hart

2. Marin County Development Code Chapter 22.08, pages II-9 to II-16 - [https://www.marincounty.org/-/media/files/departments/cd/planning/currentplanning/devcode-amendments-2019/devcode\\_2019\\_artii.pdf?la=en](https://www.marincounty.org/-/media/files/departments/cd/planning/currentplanning/devcode-amendments-2019/devcode_2019_artii.pdf?la=en)

3. Marin Countywide Plan and Agriculture and Food Chapter - [https://www.marincounty.org/-/media/files/departments/cd/he/cwp\\_cd2.pdf](https://www.marincounty.org/-/media/files/departments/cd/he/cwp_cd2.pdf)

4. Managing Land in Motion: An Administrative History of Point Reyes National Seashore, Chapter 3 by Paul Sadin

These principles are supported in MCL's Agricultural Policy Statement's (attached) 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."

We emphasized and linked this goal to this GMPA planning process and pending outcome in our scoping letter dated November 13, 2017 (attached) with the following statement:

"We hold that there is a direct and mutually supportive connection between the GMPA and our agricultural policy and seek to partner with the National Park Service (NPS) and the ranch and farm families on the Seashore to realize this connection."

### **MCL Supports NPS's Preferred Alternative (Alternative B)**

MCL considers the "preferred alternative" (Alternative B) presented in the DEIS to represent the best opportunities for environmental improvements compared to existing conditions. Furthermore, providing 20-year leases to 31 ranches on 28,700 acres provides a term of sufficient length to support NPS and leasing farmers in their collaborative efforts to manage the natural, cultural, historic, and scenic resources in the planning area. Accordingly, MCL supports Alternative B. We do have concerns about specific issues as described in the comments that follow. Our specific requests and recommendations for correcting deficiencies in the GMPA and DEIS are presented in italics.

### **Specific Comments and Recommendations**

- **Implementation of Mitigation Measures in Agricultural Lease/Permits and Ranch Operating Agreements:** Appendices D, K, and L (respectively, Management Activity Standards and Mitigation Measures, Biological Assessment – US Fish and Wildlife Service, and Biological Assessment – National Marine Fisheries Service) provide detailed and appropriate management practices and mitigation measures for long-term protection of soil, water, air, and biological resources. The draft PRNS and North District GGNRA Agricultural Lease/Permit references Appendix D 13 times for its standards and mitigation measures to be incorporated into proposed Ranch Operating Agreements (ROA).

*The GMPA and Final EIS should include the Agricultural Lease/Permit and ROA templates as appendices and clarify how proposed standards and mitigation measures will be selected and implemented within the planning area to ensure that preservation strategies proposed in the DEIS are achieved. Additionally, Appendices K and L should be referenced, where relevant in the Agricultural Lease/Permit and ROA, as resources for identifying additional standards and mitigation measures for protecting threatened and endangered biological resources.*

- **Visitor Use, Experience, Access, and Capacity:** The DEIS is programmatic in its approach to the topic of Visitor Use. As stated in Appendix E, "...this appendix contains potential recommendations..." and "...establishes a *vision of the future*..." for visitor use (emphasis added). Similarly, the DEIS Executive Summary explains that "Implementation of some programmatic direction, such as future development to facilitate public use and enjoyment, would require additional project-level planning and compliance..." (emphasis added) Although MCL has aspirations for increased visitor use experiences and strategies to improve PRNS/GGNRA visitor capacity, we are also concerned about this topic and previously provided extensive comments on how it should be addressed in the DEIS in our scoping comments dated November 28, 2018 (attached, page 2).

*The analysis of options to achieve improved visitor experience and capacity in the DEIS is inadequate for the following reasons:*

- *It fails to provide sufficient detail regarding methods and modes for improving traffic congestion and vehicle management, and for reducing impacts at trailheads both within and outside the planning area.*
- *The DEIS assumes that visitor volume will be similar to historical numbers of 2.5 million per year. An adequate analysis for impact assessment purposes must anticipate that visitor numbers will surpass this annual volume over time, analyze related impacts, and identify measures to accommodate and avoid or mitigate localized impacts from the demands that more visitors will place on new trail networks, trail heads, and other locations used by visitors.*

*This inadequacy of the DEIS's impact assessment should be corrected in the Final EIS.*

- **Working landscape and cultural resource preservation:** Table 2 in the DEIS (pages 27-30) lists specific strategies for the “preservation of area resources” within the planning area. These include strategies for protecting ecological functions, native and nonnative species, and cultural resources. The strategies for cultural resources provide for the protection and management of historic features, such as fences, buildings, and historic and prehistoric archeological sites. Missing from this table and desired conditions is preservation of the current “working landscape” as a cultural resource. As summarized from MCL’s scoping letter (dated November 13 2017):

“The cultural and historic resources that have been preserved in PRNS/GGNRA are the combination of the historic pastoral landscape and the multi-generational farm families, who, four and five generations later, are the legacy of the historic period of ranching and farming on the Point Reyes Peninsula which dates to the mid-1800s. The working landscapes they manage exemplify the national movement to strengthen local food systems; and they have contributed to maintaining the scenic resources of coastal grassland and other ecological riches that are the hallmark of PRNS/GGNRA. They also must comply with stringent state and federal environmental standards.”

We believe that a preservation strategy for managing the cultural resources represented by operating farms and ranches is important for achieving the intent of the PRNS/GGNRA enabling legislation and amendments. As reconfirmed in the recently published House Joint Resolution 31, “multi-generational ranching and dairying is important both ecologically and economically” and is “consistent with Congress’s intent for the management of Point Reyes National Seashore.” This approach is supported by the NPS *Management Policies* 2006, which include “the park’s scenery, natural and historic objects, and wildlife, and the processes and conditions that sustain them, including, to the extent present in the park...cultural landscapes...” as being subject to the no-impairment standard, and that “a cultural resource may be a tangible entity or a cultural practice.”<sup>5</sup> Appropriately, the two Historic Districts are cultural resources that are made up of features such as fences and buildings, and by historic vernacular landscapes that continue to be maintained by the historic and cultural activity and practice of ranching.

*NPS, through the GMPA and Final EIS, should recognize this current connection between historic and ongoing active agricultural operations as a “cultural practice” and, therefore, a cultural resource subject to the no-impairment standard. This ongoing cultural practice represents an important cultural resource and exceptional educational opportunity for the public. The environmental, ecological, cultural, educational, and other socio-economic benefits that active agricultural operations bring to PRNS/GGNRA support NPS’s mission and should be fully addressed in the Final GMPA and EIS.*

- **Zoning and Subzoning Framework:** MCL supports applying a new management zone, the Ranchland Zone, to the planning area. This will clear-up ambiguities that currently fail to clearly

5. NPS Management Policies 2006, 1.4.6.

demarcate the planning area. MCL also generally supports the Subzoning Framework proposed in Alternative B with some qualifications. Successfully achieving both natural resource and agricultural management objectives may require implementing some practices across the boundaries between the proposed resource protection, range, pasture, and ranch core subzones. Managing fire fuels for example, must, by necessity, cross subzone boundaries. Similarly, integrating soil and water conservation practices, including carbon beneficial practices (listed in Appendix D), should relate to where on the landscape they can be most effective. MCL's scoping letter of November 28, 2018 (attached, page 3) recommended a planning approach that invests the Subzoning Framework with enough flexibility to enable working across subzone boundaries. This flexibility will enable management activities to be more effective in achieving environmental benefits and avoiding/mitigating adverse environmental consequences.

*We conclude that the DEIS has not adequately considered the potential environmental benefits to be gained by incorporating this kind of flexibility into ranch zoning. The Final EIS must fully consider the adverse environmental consequences (such as increased wildfire hazard and greenhouse gas emissions) that can be minimized or avoided, as well as beneficial environmental effects (such as carbon sequestration) to be gained by working across subzone boundaries where feasible. If NPS does not feel such flexibility is warranted or appropriate, the Final EIS should clearly explain why not.*

- **Agricultural Diversification:** The justification for diversification of ranching activities appears only once in the DEIS under the description of Alternative A (Page 20): "Diversification of ranching activities allows ranchers to react to poor forage production years and fluctuations in the economic market (e.g., the price of cattle, grain, hay)." To enable the economic resilience implied in this justification, MCL supports the inclusion of proposed agricultural diversification activities as described under Alternative B, including limited row-crop production, pasture poultry raising, alternative grazing livestock species, and farm tours and stays, among others, as conditioned by the subzoning framework (Resource Protection, Range, Pasture, and Ranch Core).

*The descriptions of potential diversification activities, however, raise questions that must be addressed in the Final GMPA and EIS as follows:*

1. *Is the option for 2.5 acres of unirrigated agriculture both viable and advisable as an agricultural enterprise? This approach implies dryland farming – i.e., relying upon winter rains to produce crops such as certain cereals or potatoes by tilling and seeding in the fall and harvesting in the spring. As an alternative, irrigation would afford the opportunity to produce crops that are planted in the spring and harvested through the summer and fall, thereby increasing the options and the economic viability of row crop farming. The Final EIS should consider this option, including mitigation measures for any potential impacts.*
2. *Could grazing by alternative species in the range zone achieve natural resource objectives like fire fuel reduction and prevention of vegetation type conversion, as well as protection of sensitive resources? Could the use of multiple species in a prescribed and rotational manner provide a diversity of options and opportunities in achieving preservation strategies outlined in the DEIS?*
3. *For dairy operations currently without silage production, could this important forage source be added within the pasture zone, with specific mitigation measures to reduce unacceptable impacts?*
4. *Finally, how might NPS staff, working with management and mitigation measures presented in Appendices D, K, and L, obtain technical advisory input to improve the economic viability of these proposed diversification activities, to fulfill the integrated objectives of ranch sustainability and natural resource stewardship?*
5. *The Final EIS should address the possible relationship between types of diversification and proliferation of pest species; the allowable techniques that ranchers might use to control*

*such pests, including Integrated Pest Management for pest like gophers; and the potential impacts of pest species on sensitive resources in the park.*

- **Planning and stewardship of agricultural lands in the planning area.** The NPS preferred alternative (Alternative B) identifies future authorized activities within the planning area. These activities include modest agricultural diversification in the Ranch Core and Pasture planning subzones. The DEIS requires mitigation measures to be incorporated into individual Ranch Operating Agreements (ROAs) for each ranch activity. Further, many mitigation measures require consultation with NPS staff before activities can occur. Specific activities for each lease will be authorized in the respective ROA. There seems to be no comprehensive planning effort that will be completed on a ranch scale, however.

As an example, carbon farming is a collection of standard practices designed to maximize the land's ability to sequester carbon and reduce new greenhouse gas emissions while making farmland more resilient to a changing climate. As outlined in a Carbon Farm Plan some of these practices are big long-term goals, while others address near-term priorities. A Carbon Farm Plan serves as a guide to realize the potential climate benefits on the land, enable many other benefits these practices can have on ranch productivity and the environment, and identify potential funding partners to help implement these practices.

Carbon farming practices bring many co-benefits beyond sequestering carbon and reducing greenhouse gas emissions. Practices are designed to benefit the natural environment and the agricultural operation. Some examples include:

- Increasing carbon in the soil reduces soil erosion, promotes plant growth, and helps the soil hold on to more water. That means plants can grow longer into the dry summers, produce more forage for livestock and sequester even more carbon.
- Restoring creek vegetation increases wildlife habitat, stabilizes creek banks, improves water quality and reconnects flood plains.
- Rotational grazing promotes vigorous grasslands with deep roots, encourages native grassland species, and improves productivity.
- Planting diverse windbreaks and hedgerows provides shelter to livestock and reduces the drying effects of wind, allowing pastures to stay green longer into the summer. They also increase wildlife habitat and provide species for native pollinators.
- Using a methane digester for manure generates gas that can be burned for electricity and results in a more stable waste stream for applying back to the land.

*The GMPA and Final EIS should make it clear that lessees in the planning area are allowed to work with qualified resource professionals, the Marin Resource Conservation District, the Marin Carbon Project and USDA Natural Resource Conservation Service to complete ranch-scale conservation plans or Carbon Farm Plans in the planning area. These plans will help NPS staff and the lessees write appropriate ROAs to incorporate best practices into their planning.*

- **Succession:** Separate from the DEIS, NPS has provided a draft "Succession Policy for Ranch Operations within the Ranchland Zone for Point Reyes National Seashore and the North District of Golden Gate National Recreation Area" that would be used in the event "that named Lessees: (i) do not wish to enter into a lease/permit; (ii) cannot agree upon an arrangement among named lessees for continued operations under a new lease/permit, (iii) have not consistently met performance standards for the agricultural operation and other named Lessees are not willing to take on responsibility for improved operations..."

MCL supports this draft succession plan because it would help to ensure the succession from current to future agriculturalists in the planning area and also ensure that practices that are currently maintaining the cultural landscape and heritage would continue into the future.

*The GMPA and Final EIS should clearly describe this succession plan and incorporate it into the GMPA so the public is fully aware of the terms and conditions of lease succession.*

- **Establishment and renewal of 20-year leases.** Preferred Alternative B contemplates the establishment of 20-year leases for the existing agricultural operations within the planning area. MCL agrees with the establishment of 20-year leases because they will give the operators the certainty of tenure necessary to invest in the long-term success of their operations, including necessary ranch infrastructure improvements, improvement and diversification of agricultural operations, and improvements to natural resource values. However, the DEIS does not adequately address what happens to the leases established by the GMPA after the conclusion of the proposed initial 20-year lease period.

The DEIS dismissed analysis of rolling leases because they have “no fixed termination date,” are “... not consistent with ranching in a setting as complex as the planning area...,” and “...the 2013 Secretarial delegation of authority to NPS and Congressional guidance directed NPS to consider issuing leases with 20-year terms.”

MCL’s scoping letter (November 28, 2018) stated that “while the proposed 20-year leases are a good first step. . . , longer leases would contribute greater confidence and stability.” We suggested that “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).”

NPS has provided a copy of the Draft Agricultural Lease/Special Use Permit (draft lease) in response to prior public comments. The draft lease, on page 9, Section 5.3 contemplates an extension of the lease:

“Six months prior to the Expiration Date of the lease, NPS may offer this lease, or a similar lease, to Lessee. If Lessee fails to execute a subsequent lease prior to the Expiration Date, the Provisions of this Lease regarding Lessee’s obligations to surrender and vacate the Premise shall apply. Lessor has no obligation to offer a subsequent lease to Lessee.”

The DEIS does not address the conditions necessary for NPS to “offer this lease or a similar lease, to Lessee.” This creates uncertainty for the future of ranching operations in the planning area after the 20-year leases reach their term and could potentially lead to unnecessary future litigation. The public should understand the conditions and terms of “this or similar lease” that may be offered to the lessee as well as the conditions that would lead NPS to not offer such a lease to the operator(s).

MCL believes that the topic of renewal and succession should be documented and understood as part of the GMPA and addressed in the Final EIS, in that both socioeconomic consequences (e.g., the cultural continuity of agriculture on the Seashore) and environmental consequences (e.g., the ability of ranchers to continue funding environmental improvements) could be either positive or negative depending on the manner in which renewal or succession is managed on the expiration of the initial 20-year term.

*Therefore, GMPA and Final EIS should consider the environmental and cultural consequences of various options that may occur when 20-year leases are nearing expiration. The GMPA and Final EIS should make the procedure for lease renewal clear including a significantly longer time frame than 6 months prior to expiration to renew or issue new leases, and that includes the conditions and terms of the same or similar new lease and the conditions for not offering such a lease. Providing for renewal only 6 months prior to expiration is inconsistent with and may frustrate the purpose of an initial 20-year lease and is inherently inconsistent with Secretarial and Congressional guidance concerning the 20-year leases. The Final EIS should address and resolve this issue*

*because not providing the analysis and approach for this impending decision at this time defers a lengthy debate and planning process to 20 years from now. It also places the cultural resource of active agricultural operations and continued funding support for environmental mitigations in a state of uncertainty and at risk in the future.*

- **Lease Appraisal Process.** Under its preferred alternative (Alternative B), NPS proposes to implement a “master appraisal process managed by the US Department of Interior (DOI) to determine the FMV for park ranch operations.” MCL could not find guidelines for such a “master appraisal process” on DOI’s website or in the Uniform Standards of Professional Appraisal Practice (USPAP). Without a clear guide for the appraisal process, the referenced “master appraisal process” could lead to lease values that are fair for some leases but may not be economically viable for others. This could effectively price operators out of their leases.

*The Final EIS should clearly explain the appraisal process for the proposed 20-year leases and explain what will be done to ensure that it is fair and equitable to all lessees given the significant mitigation measures that would be applied to all ranching activities allowed under the preferred alternative. The costs of implementing these measures should be considered for each lease when DOI appraises the value of the potential leases.*

- **Elk Management:** The DEIS and appendices provide a thorough description of the affected environment with respect to the tule elk herds in the GMPA planning area.

MCL believes that NPS has done a credible analysis of the management alternatives potentially available to it for the elk herds at PRNS, and generally supports the proposed elk management program described in Alternative B, the preferred alternative. We conclude that the overall approach to managing elk for coexistence with the cattle and dairy ranches at PRNS is reasonable and based on sound science and judgment by qualified professionals. MCL does, however, have specific concerns and comments regarding the proposed management program for elk, including some that involve adequacy of the DEIS as follows:

- **Model to Predict Rangeland Residual Dry Matter (Appendix I):** The “Forage ( ) R” model described in detail in Appendix I of the DEIS is a credible effort to provide an objective, scientific means to measure and manage for an acceptable level of competition for forage between elk and livestock on ranches impacted by elk. We understand that the model was developed for this GMPA and DEIS (i.e., it is not an established model that has undergone monitoring and refinement over a long period of time). As such, it can be regarded as “untested,” so there should be very clear procedures specified regarding how adjustments, exceptions, and professional judgment would be applied quickly in the event that any of the affected ranchers can demonstrate that it is not working as intended for their individual operations and, as a result, their operations are being adversely affected.

As stated in the DEIS on page 41, the intended objective for managing the Drakes Beach elk herd is to maintain the herd at a “population level compatible with authorized ranching operations.” However, there must be some recognition of, and method for dealing with, the variability among individual ranches in achieving this overall objective. The fact is, some ranches may not experience an acceptable level of compatibility/coexistence with elk as a result of applying this model while others will. This includes during extended periods of low rainfall and drought. There should be a clear procedure and criteria established to address a significant threat to the economic viability of any of the ranching operations. If any of the ranching operations prove to be in danger of failing as a result of not reaching an acceptable level of coexistence with elk, the stated objectives of the NPS for managing PRNS in the planning area cannot be fully achieved. Having a process defined that would do everything possible to prevent this would significantly help to avoid/mitigate potential adverse socioeconomic impacts to the region.

*The GMPA should be revised to recognize and describe a procedure for addressing the potential seasonal and annual variability in the degree of success that may occur to individual ranching operations as a result of applying the model. The procedure should include a description of how the model will be applied, monitored, and adjusted to quickly respond to problems that may be identified at any of the affected ranches. The Final EIS should address the potential socioeconomic consequences should any of the ranching operations fail as a result of not doing so. We believe that the DEIS is presently inadequate without this analysis.*

- Fencing. The DEIS describes how fencing would be used as a management tool for a variety of objectives with respect to elk. The discussions, however, focus on using fencing as a means to enclose elk in a defined area. We did not find any discussion of how and whether it would be feasible and beneficial to use fencing to exclude elk from certain areas to reduce competition for forage or otherwise reduce conflicts with livestock.

*The Final EIS should address fencing to exclude elk from certain areas in order for the public to understand if this is feasible and how it could be employed.*

- **Lethal vs. nonlethal population control.** MCL supports control of the Drakes Beach elk herd to maintain a maximum number of 120 animals as proposed in Alternative B. We encourage the use of nonlethal methods whenever feasible and understand this is not currently possible or practicable for reasons that are clearly explained in the DEIS. NPS has indicated that lethal methods will be employed as a “last resort” in the future to achieve the maximum herd size proposed. We support the use of lethal methods under those circumstances. We also concur that fertility control is not a practicable method of population control for the reasons explained in the DEIS. In evaluating population control options in the future, we encourage NPS to also consider humane treatment as an important criterion.

## Conclusion

MCL, as an established local environmental organization in Marin with an 85-year history, has the institutional experience to know, but for the fact that Congress, local conservationists, and the agricultural farmers and ranchers cooperated to create the PRNS, we could be living in an alternative condition of housing and recreational development. Therefore, among other significant policy decisions and opportunities, MCL actively supported the formation of PRNS and GGNRA as fundamental to preserving the diverse and priceless natural resources and scenic landscape that is west Marin's condition today, enjoyed by millions of visitors from around the world. Working ranches on PRNS and GGNRA have played a major role in maintaining a landscape that contributes to the economy and helps to protect natural ecosystems that are part of our national heritage. Because of these connections, ranching as an important element in the parks (PRNS/GGNRA) will continue to be important to MCL and to that end we offer these comments.

Respectfully,



Linda J. Novy  
President

## Attachments:

1. Marin Conservation League Agricultural Policy Statement dated October 14, 2015
2. Marin Conservation League Comment letter dated November 13, 2017
3. Marin Conservation League Comment letter dated November 28, 2018



# **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, 3<sup>rd</sup> 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.

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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](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





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)<sup>1</sup> 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.

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<sup>1</sup> Marin Climate Action Plan Update 2015 - [https://www.marincounty.org/~media/files/departments/cd/planning/sustainability/climate-and-adaptation/execsummarymarincapupdate\\_final\\_20150731.pdf](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

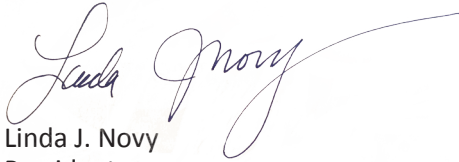
- The EIS should analyze the socioeconomic benefits that the ranching operations on PRNS and GGNRA provide to West Marin and Marin-Sonoma communities, including employment, school enrollment, and support industries. Agriculture on the PRNS/GGNRA represents about 19% of the areal extent and 19% of total 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, 3<sup>rd</sup> 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.

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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](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