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David Lewis, Director, University of California Cooperative Extension-Marin County
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Dear Director Lewis:

The Sierra Club reviewed the 7/09 PRNS Response to the 6/09 UC Davis Report "The Changing Role of Agriculture in PRNS" posted at www.nps.gov/pore/parkmgmt/planning_otherplanning.htm. As you likely know, the Sierra Club initially described this UC Report as containing significant errors in **History, Science, Policy** and **Conclusion**. Having read the PRNS Response, we stand firmly by our initial assessment. The Report intentionally misleads readers away from Marin County's historic complicity in destroying ag in Marin and its current unwillingness to confront property rights lobbying to increase the value of their "final crop." The Report points an erroneous accusing finger at PRNS when in fact PRNS's own efforts to protect its ag have been more successful than Marin's. Attached is our non-exhaustive list of details that we believe deserve your review and correction.

In our opinion, the history of the prior UC Davis Cooperative administration was one of provoking controversy, rather than cooperation, with PRNS. The 6/09 UC Report was simply the parting shot in this unfortunate history. We urge you, as the new UC Cooperative Director to open a new and more cooperative chapter in the relationship between County, UC Davis, PRNS, ranchers and the environmental community.

In our opinion, a first page in this new more cooperative chapter should be that UC Davis withdraws the erroneous 6/09 Report from its website until selected UC Davis staff work with PRNS to correct the Report's factual errors. If there are still areas of disagreement, then it would seem appropriate for the Report to provide a brief summary of both perspectives. Hopefully, then, a more accurate Report can then be re-posted on the UC website and also re-distributed to those who receive the erroneous former Report.

However, a correction of the former UC Report, while necessary and welcome, may not be sufficient because the Report's biased authors continue to believe it is "as neutral and positive as possible" when it is clearly not (<http://ucanr.org/blogs/anrnews/index.cfm?tagname=public%20policy>). These biased individuals are almost certain to create even more disinformation that diminishes the reputation of UC Davis at the expense of taxpayers who, in this era of tight budgets, fund both the creation of erroneous Reports and then the correction of those errors. In our opinion, opening a new chapter of fact-based cooperation would include inserting a record of this matter into the personnel file or independent contractor file of those responsible for the errors in this Report and the assignment of un-biased individuals to work for UC Davis, particularly with PRNS. Under the California Public Records Act, we hereby request copies of all emails, letters, records of phone calls or any other documentation regarding the preparation of the 6/09 UC Davis Report.

Please advise us on what your intentions are regarding the erroneous 6/09 UC Davis Report.

Sincerely,

Gordon Bennett, Sierra Club Marin Group, Agriculture Chair

HISTORY

The title of the UC Davis Report ““The Changing Role of Agriculture in Point Reyes National Seashore” is erroneous, misleading and biased. Page 18 claims “PRNS has taken more than 18,000 acres of ranchland out of ranching, including thousands of acres within the Pastoral Zone (Figure 1). This statement is false. As the PRNS Response notes, the 1980 GMP defined a pastoral zone of 24,687 acres, yet current permitted grazing acres are 28,064, or 3377 more acres than permitted. This is a potential violation of which the Sierra Club was not previously aware and which is currently subject to a Freedom of Information Act (FOIA) request to PRNS.

The relatively un-changing role of PRNS agricultural stands in stark contrast to ag acres under County jurisdiction. The PRNS Response notes that ag land under County jurisdiction lost 2522 acres between 1990 and 2002 alone to urban conversion. This figure does not include ag acres lost 2002 to date, lost between PRNS’s founding and 1990, or nominal ag acres lost to non-agricultural use. The sum of ag acres lost under County jurisdiction since the formation of PRNS dwarf in both total and percentage those “lost” ag acres in PRNS. Nevertheless, the UC Report, which is funded by Marin County, misleads readers away from the County’s own complicity in destroying ag acreage in Marin by ignoring well-documented Marin history. *“At the end of the 1950s, [Marin’s] political establishment typified the ‘growth machine,’ with government closely integrated with real estate and business associations, all pursuing development as the epitome of progress and the harbinger of prosperity... In 1966, a freeway revolt changed the future of Marin ”*(<http://juh.sagepub.com/cgi/reprint/34/1/38.pdf>).

The County’s own pro-growth policies affected private ranches soon to be acquired by PRNS, most of which were either out of business when purchased, or about to go out of business due in part to pressure from ag acres taxed at urban rates. Nonetheless, Figure 1 misleadingly implies that PRNS caused every ag acre lost in what is now PRNS. And page 18’s false statement about PRNS removing 18,000 agricultural acres was made despite the Report’s Figure 1 describing agriculture acreage as of 1959 (i.e. before PRNS was formed). These ag losses are due to the County decisions, not PRNS decisions. In contrast to property tax pressures on ag lands under County jurisdiction, the PRNS Response notes that current PRNS grazing rates are half and their duration ten times that of grazing leases on comparable lands, when they should be at fair market value and duration. This is another possible violation of which the Sierra Club was not previously aware and which is currently subject to a FOIA request to PRNS. There are also a multitude of errors on specific ranches from which the UC Report erroneously claims that PRNS removed ag and should be “regained”:

- Giacomini Ranch The UC Report pg 17 erroneously claims PRNS removed ag from the Giacomini Ranch. In fact that NPS purchased the ranch from willing sellers for the purpose of wetland restoration, thus it was the sellers, not PRNS that removed ag. This ranch was not part of the Spanish ranching history and was created by damming the bottom of Tomales Bay, in response to a WW II food shortage. The PRNS purchase returns the ranch to its longer history as a wetland. UC Report, astoundingly, ignores the fact that this hugely popular project created one of the largest coastal wetland restorations on the Pacific Coast that is key to endangered salmon habitat and water quality in Tomes Bay. Does UC Davis propose that PRNS regain the ag acres by demanding the money back from the Giacomini family, re-hire the bulldozers to put back the dams, un-do the restoration, put back in the manure holding ponds, and restore private cattle grazing where egrets probe and leopard sharks now bask?

- New Albion Ranch The UC Report pg 17 erroneously claims PRNS removed ag from New Albion Ranch (the Elk Reserve). In fact, per 1994 publication “Ranching on the Pt Reyes Peninsula”, the dairy operation ceased in the early 1960’s while PRNS purchased the ranch almost a decade later. That the UC Report proposes to “regain” the Elk Reserve for ag is particularly egregious in that Congress designated this area as wilderness to protect the elk (1976 PL 94-576, 94-389). Does UC Davis propose to evict the elk so that public lands can be grazed by private cattle rather than native ungulates?

- D Ranch UC Report page 16 erroneously claims that PRNS removed ag from D Ranch. That would come as a surprise to PRNS ranchers Nunes and Spaletta who took over D ranch when the Horicks could no longer continue. PRNS removed only 200 steep lightly grazed acres for riparian protection around Horseshoe Pond. Does UC propose undoing this riparian buffer to re-graze the steep acres?

● Wilkins Ranch The Report's Figure 1, by Livingston, erroneously claims the Wilkins Ranch was "removed from agriculture" implicitly by PRNS. However in "A Good Life" pg 82 (1995), Livingston contradicts himself: "*Dairying at the ranch ended in the mid-1960s when Carnation, the San Francisco creamery to which the Wilkins milk was sold, was bought by a Texas company and the milk contracts in the area cancelled.... Faced with skyrocketing taxes (reportedly from \$1,200 per year in the early 1960s to \$22,000 in 1969) and low production at the ranch, the Wilkins family decided to sell.*" Two owners and a decade after pressures from the County's pro-growth property taxes and from the Carnation corporation removed ag, PRNS acquired the Wilkins Ranch. At the time PRNS staff moved into the ranch, the former tenant had let historic buildings decay, had let un-restored creeks on the Ranch continue to dump sediment into the Lagoon and was using the public's 1350 acre ranch as a private horse preserve. Ranches, including the Wilkins Ranch, around Bolinas Lagoon were acquired by NPS to restore the Lagoon's watersheds and remove the sedimentation threat to Bolinas Lagoon identified by the Phil Williams Report on the County's Bolinas Lagoon website. Does UC Davis propose to re-privatize this ranch and reverse the watershed preservation that will put Bolinas Lagoon back at risk?

● Stewart Ranch parcels in Bear Valley The UC Report pg 17 misleadingly claims PRNS removed ag from these parcels and fails to point out the urgency created by Olema Creek jumping its man-made channel to recover its Olema Flats floodplain. The Stewarts cattle would have been standing knee deep in water through which endangered coho salmon were migrating. Despite this environmental emergency that required cattle removal from Olema Flats, PRNS nevertheless allowed the Stewarts to move their cattle onto an adjacent abandoned ranch, Lupton. Does UC Davis propose that PRNS re-channelized Olema Creek so that cattle can graze in what is now endangered salmon riparian habitat?

● Lupton Ranch The UC Report pg 17 erroneous claims PRNS removed ag from the Lupton Ranch. That would come as a surprise to the Stewart Ranch in PRNS. In fact, after the death of the senior Lupton, the family did not wish to continue, so the Ranch was turned over to the Stewarts to balance the loss from the Olema Flats conversion to salmon habitat.

In summary, these historic errors, all supporting the Report's false claims, are not random but rather are clear evidence of bias. The UC Report's conclusion that PRNS should convert parklands so that "the Pastoral Zone will regain some of its lost acreage" is by its own logic better directed at the Marin County Open Space District to recompense for County policies that "removed" County ag acres.

SCIENCE

According to <http://ucanr.org/blogs/anrnews/index.cfm?tagname=public%20policy>, "Rilla...wrote the report with Lisa Bush...to bring some scientific information into the conversation." But the UC Report contains scientific errors, selective presentation of science, misleading science and unsubstantiated scientific conclusions.

For example, Page 2, paragraph 5: UC Davis erroneously claims that "most native grazers [are] extinct" and claims without any substantiation that "livestock grazing is the only ecosystem process that...keep(s) shrubs from invading grasslands." But PRNS pointed out that "most native grazers are present" and that no data supports the claimed shrub invasion, which may be "a reversion to historic conditions."

Page 4, paragraph 3: The UC Report admits, "livestock grazing has certainly been a factor in the loss of native plant species on some of California's grasslands," however, it erroneously attributes this impact wholly to the "past." In fact, today, the great majority of Marin's commercial grazing continues to be driven by economic, not biological, needs, and thus continues to have significant negative impacts on biodiversity. Tomales Bay is "impaired" due to excess coliform and sediment in part because commercial grazing destroyed and continues to suppress native riparian vegetation.

Page 4 paragraphs 5: UC Davis quotes Hayes and Holl (2003) as stating that grazing can benefit *annual* forbs. However, this is misleading and a selective presentation because PRNS's Response points out that the very same study also states, "cover and species richness of native *perennial* forbs were higher in ungrazed areas." This distinction is particularly important, and thus the UC Davis errors particularly misleading, given that, "the coastal prairie of PRNS is a *perennial* system."

Page 4, paragraph 6: the UC Davis Report claims, “In *all* cases [commercial] grazing has proven compatible with the preservation of special status species found at PRNS.” However, PRNS points out that the quoted UC sentence is erroneous and contradicted by the prior UC sentence that notes, “Research and anecdotal information have shown that grazing is strongly linked to maintaining habitat for *some* special-status species at PRNS, while they have been inconclusive for *others*.” There is no dispute that commercial grazing, when managed with the goal of increasing biodiversity, as opposed to increasing profits, can help control invasive species. However, the benefits to *some* special status species that are claimed to come *only* from commercial grazing are unsubstantiated because they could also (and preferentially) be provided by native grazers such as tule elk. By favoring cattle over elk with the unstated John’s disease red-herring, the UC Report fuels a range war whose prize is the PRNS grass and whose victims are elk confined to the “Refuge” solely to benefit commercial grazing.

Page 6, paragraph 3. The UC Davis Report repeats the statistical fallacy that correlation proves causation. This fallacy occurs in the Report’s discussion of the Myrtle’s silverspot butterfly and the California red-legged frog. For example, it is incorrect to state that simply because there are large numbers of red-legged frogs in the pastoral zone, then grazing benefits frogs. In contrast, the PRNS Response notes that red-legged frogs benefit from ponded water and marsh areas. Since the pastoral zone is generally flatter than other areas in the park, it naturally has more frog areas.

In summary, the UC Report repeatedly claims a scientific basis for ecological benefits of commercial grazing based on scientific errors, selective presentation of data, misleading scientific statements and thus its claim is at best unsubstantiated and at worst, biased and self-serving.

POLICY

Needless to say, Sierra Club positions on PRNS mariculture differ from UC Davis’s. The Club believes that PRNS ranches must be considered different from mariculture because no-bid permit renewal rights were intended to incentivize sale of private property (Drakes Estero was public property).

It appears all parties agree that law and policy support continued ranching in the PRNS pastoral zone, but we note that the UC Report contradicts itself when on page 10 it quotes the House Committee describing: “... a pastoral zone...used... exclusively for ranching and dairying purposes.” Yet on page 11 the Report complains about PRNS “restrictions on agricultural crops and products” despite that fact that row cropping is not ranching and dairying. The Sierra Club’s position will honor our end of the bargain and support ranching and dairying and in the existing pastoral zone acreage (no expansion, no contraction). However, we will support limited “diversification” on parkland that is related to and incidental to the commercial ranching or dairying that occurred on the ranch when purchased by the Seashore. But if turkeys turn out to be more profitable than cattle, then does UC Davis propose that the PRNS pastoral zone and more turn into a giant turkey farm?

The Sierra Club also agrees with the Harold Gilliam quote on page 10 regarding “preserving the rights of individual residents who want to continue...ranching.” However, if these individuals or their heirs no longer wish to ranch, then that does not become a PRNS obligation to allow anyone to perform any type of agriculture whatsoever. We support the PRNS policy of encouraging other ranchers in the pastoral zone taking over abandoned ranches (eg Lupton and D) to maintain the PRNS agricultural base. In contrast, we point out that neither UC Davis nor Marin County supported recent Marin Countywide Plan proposals to require proactive ag easements when McMansion proposals threaten ag production, nor did Marin or UC Davis comment on ag in the Sonoma General Plan update even though Sonoma is a much larger contributor to Marin ag vitality than PRNS. In fact, PRNS historically and currently has been more successful and proactive in protecting its ag land than Marin County.

CONCLUSION

Given all of the above errors and biases in History, Science and Policy, the UC Report appeals to the prejudice and emotion of the uneducated public to pile onto “the usual PRNS suspects.” The Report intentionally misleads readers away from its funder’s (Marin County’s) unwillingness to confront property rights lobbying to increase the value of the “final crop” at the expense of ag advocates like the Sierra Club, who support proposals to enhance the likelihood of sustained and sustainable ag in Marin. **END**