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Point Reyes National Seashore
Attn: Don Neubacher, Superintendent
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Thank You for the opportunity to comment on the various Park Management Concepts described Point Reyes National Seashore (PRNS) General Management Plan (GMP) Update Concepts Newsletter 2003.

Overview

Our over-riding concern and comment is that none of the Concepts come close enough to the philosophical touchstone from which all park policies should be measured, namely the 1916 Organic Act's National Park Service mission statement: *"to conserve the scenery and the natural and historic objects and the wild life therein and to provide for the enjoyment of the same in such manner and by such means as will leave them unimpaired for the enjoyment of future generations."*

As the Newsletter correctly notes, per NEPA requirements, that Concept 1 (Continuation of Current Management) *"provides a baseline for evaluating changes and impacts in the other concepts,"* however, we believe this has resulted in a selection of concepts that provide mere incremental changes from current policy. In particular Concept 2 (Special Emphasis on Preservation and Restoration of Natural Resources) does not go far enough to represent a vision consistent with the Organic Act because it does not adequately protect natural resources. Consequently, we urge further work to create a new Concept which is not "pre-compromised" and insures that natural resources remain *"unimpaired for the enjoyment of future generations."* A few examples (not exhaustive of changes suggested for a new Concept 2) should make our perspective more clear.

Trails

It appears that in all proposed Concepts, even Concept 2 for Natural Resource Preservation, the *"trail system would be expanded."* This universal bias toward trail expansion comes in spite of the fact that the November 2003 PRNS Trail Inventory notes that the park is *"liberally laced...with trails and roads...that had not been constructed or maintained in the most environmentally sensitive*

manner...and the backlog of funding existing repairs and maintenance is so extensive.”

Poorly designed roads and trails have been shown to be significant contributors of excess sediment that impairs salmonid breeding habitat. Tomales Bay has been declared impaired by excess sediment. Yet the criteria for funding priorities emphasize replacement and rehabilitation, omitting the option of returning poorly designed trail to natural conditions. The criteria prioritize trails hazardous to visitors but not to endangered species and likewise prioritize trails that provide critical links to regional trail systems but not those that provide critical links to endangered species breeding habitat.

The Trail Inventory provides estimates costs of 2.52 million dollars for 10 “Line Item” trail construction projects totaling 12.6 miles of the Park’s 147 miles of trails. However, the Trail Inventory does not provide an estimate for bringing the entire trail system into an environmentally sensitive condition. If the cost for the remaining 134.4 miles of trails is the same per mile cost of the 10 Line Item projects, then the total cost to rehabilitate the entire system would be almost 30 million dollars. As with our over-riding concern about not using current management as the baseline to judge the GMP proposals, we believe that PRNS should look at its 2.5 million dollar trail rehabilitation proposal not as 2.5 million more than is currently available, but rather as 2.5 out of an estimated 30 million needed to protect resources from trail impacts.

Bear Valley trail, for example is not included in the "Line Item" list, yet the Inventory notes *“poorly designed and failing culverts throughout this trail should be replaced with natural bottom culverts or bridges to permit the spawning migration of anadromous fish and for the benefit of other aquatic species.”* The Coast Trail Service Road also not on the “Line Item” list, yet the Inventory notes *“resource management have surveyed this trail and recommend culverts and bridges be replaced in order to protect aquatic species and allow fish passage.”*

Considering new trails without accounting and mitigating for the legacy of old trails is a slash-and-burn approach to recreational “opportunities” that PRNS should eschew. Because many of the old trails were established for farm purposes, they often are configured according to former property lines that are no longer relevant after the park’s acquisition. Consequently more emphasis should be given to eliminating duplicative roads and trails, particularly in wilderness areas, where larger undisturbed areas would provide significantly greater habitat value. Just as the Presidio’s cannons are historically preserved but do not fire, so the legacy of historic trails can be preserved without the trails themselves being operational.

Proposed new trails should not increase the burden on park maintenance and natural resources, but additionally should only be considered if they reduce these burdens. For the new trails to only mitigate, but not reduce, their burden, non-park entities would need to develop funding adequate not only for planning, construction and monitoring of the new trail, but also to provide an endowment for the permanent maintenance of both the new trail and also for those elements of

the connecting trails that would come under increased use and thus require increased maintenance due to the new trail. Then to reduce the burden of the new trail beyond just mitigation of its impacts, additional funding would need to be developed to reduce the rehabilitation backlog on the existing trails.

We wish to express particular concern about the proposed paved Tomales Bay Bicycle Trails. Since these trails, proposed along the old NWPRR railroad bed, would require substantial fill, bridge, causeway and culvert construction, we would oppose these new trails in this location. Furthermore, since the Giacomini marsh restoration project is already closely bounded on three sides by paved roads, culverts, bridges and causeways that negatively impact natural resources, we would also object to retaining for bicycle use the Giacomini dike on the final and fourth side of the restoration that is now scheduled for removal to enhance natural resource values in the marsh.

Development

Concerns about new trails are repeated for new development. Every new structure burdens the park with an endless liability for maintenance. Given that the park does not have the money now to maintain its current buildings, then new buildings, like new trails, should be considered only if they reduce the overall facilities burden on the park by replacing structures in order to lower maintenance costs or to reduce impact on the environment. In general, we encourage PRNS to develop programs, not structures. Currently developed sites total 20 in the current Concept 1, 18 in the natural Concept 2, 20 in Concepts 4 and 5, but 23 in the “balanced” Concept. It is not clear to us how 23 can represent a balance between 18 and 20. Furthermore, the overview of the balanced Concept 3 notes *“only minor additional park facilities would be built if existing structures were not available.”* PRNS should provide a listing of current and proposed facilities in addition to the Park’s current demarcation using purple dots on Concept maps.

Invasive Exotic Species

The baseline for invasive exotic species removal should not be expansion from the current levels, but rather a determination of what would be required for a complete removal and maintenance of that condition in the Park. Again, from our over-riding concern that the Organic Act should function as the baseline, even Concept 2’s statement that “invasive exotic species removal efforts would be expanded” is inadequate because it provides no indication of how its proposed “expanded” effort would measure up against the higher standard of eradication. Other Concepts call for even less exotic species removal that would be “continued” or “conducted.” It should be obvious that anything less than complete eradication will inevitably result in the invasive exotic re-establishing itself. These invasive exotics not guests invited to add to genetic diversity to the park; instead they are an invading army intent on an ethnic cleansing that will destroy the wild life in the park just as surely as bullets would.

Grazing: Overview

We understand that ranching operations in the park may have historic components that are both desirable and necessary to preserve. However, it may also be important to differentiate between historic and cultural landscape preservation vs on-going commercial grazing operations. As a drive out Pierce Point Road can easily demonstrate, the habitat impact from elk on the north side of the fence vs the cows on the south side of the fence is enormous and has impacts through the watershed and into Tomales Bay as sediment discharge (even assuming that impacts from fecal coliforms and ammonia are adequately contained).

It appears that in all Concepts, the Cultural Zone was defined by criteria based on historical significance and past commercial grazing use, with adjustments in sensitive areas for critical resource protection. Instead, using the Organic Act as the baseline, other criteria should be incorporated as primary, in specific a detailed survey of native vegetation and wildlife habitat. From this baseline, it would then be possible to determine to what extent commercial grazing operations could fit within or be useful to further resource protection. Rather than grazing areas that follow former fence line / property boundaries, grazing areas should be determined by the presence or absence of native vegetation and the capacity of the area for restoration. Likewise, in non-cultural landscape zonings, studies may show a need for grazing as a tool to maintain open grasslands and decrease fire. As a result, the three large zoning areas (wilderness, natural, and cultural) in which natural resource protection and cultural landscape preservation appear to be mutually exclusive, may in practice be a mosaic of smaller areas either heavily, lightly, or un-grazed (regardless of the zoning) when the treatment is based on the over-riding consideration of resource preservation.

Grazing: Congressional Intent study needed

PRNS should prepare a list of all other National Park Service units that have grazing or oyster operations, whether these are permanent or temporary uses, and the extent of these uses in these units. We would also urge PRNS to commission an exhaustive legal analysis (including actual legislation, testimony before committees, floor statements, and committee reports) to see whether Congress intended existing beef, dairy and oyster operations to be permanent or temporary within the PRNS management areas (PRNS and the North District of GGNRA). We urge that this legal analysis determine with a reasonable degree of certainty the extent to which there may exist any legal obligation on the Park Service to renew or extend leases for these existing agricultural or maricultural operations. We understand that offshore maricultural facilities may be under the joint jurisdiction of California Department of Fish and Game (CDFG); however, it is unlikely that these operations could continue without on-shore facilities presumably fully under PRNS jurisdiction.

We understand that sustainable / organic agricultural methods may suggest that traditional agricultural operations should be diversified to include, for example,

chickens that follow rotational grazing to help clean up manure, or sequential grazing of different livestock to break infestation cycles. We also understand that further agricultural diversification, such as farmstead cheese manufacture to compliment traditional dairy operations, or the addition of horse boarding operations to grazing operations, have been used or are suggested to be used to diversify income that may help sustain agricultural operators. Therefore, we urge that this PRNS legal analysis determine whether Congress intended to allow possible future expansion within the Park of additional agricultural uses beyond the traditional beef and dairy operations, including, but not limited to row-cropping, viticulture, orchard operations, chicken and egg production, horse-boarding, and the on-site processing and retailing of farm products produced on NPS lands.

Grazing: Habitat Impact studies needed

Impact on Natives: Since grazing operations constitute the major agricultural use in the park, we urge PRNS to prepare a list of scientific studies that distinguishes the effects that livestock grazing has on native plants, in contrast to impacts from native cervids such as deer and elk. We recognize that some studies show that some native California plants have co-evolved with native cervids and require cervid impacts to prosper. A further question to be addressed is whether the grazing of livestock, even if good management can be shown to mimic the impacts of the native cervids on certain native plants, should be preferred in a National Park over the equivalent impacts from native cervids.

Impact on Biodiversity: We also urge PRNS to prepare a list of scientific studies that determines the impacts of grazing and cultivation on overall biological productivity and diversity, regardless of their impacts on certain co-evolved native plants. We also urge PRNS to prepare a list of scientific studies on the impact on the Park's natural habitat of silage crops, including the impact of discing on the ability to restore native grasses. Lastly, Concept 5 that proposes the most grazing makes no mention at all about the extent of that Concept's proposed invasive exotic plant removal efforts. Certain grazing activities like silage growing and feed supply could add to the burden of exotic plant removal; on the other hand, carefully managed gazing activities could help control certain exotics.

Fire Protection and Preservation of Grasslands: While it is true that some native plants co-evolved with native cervids, native plants also co-evolved with fire. Livestock grazing has often been advanced as a management tool to facilitate the maintenance of open grasslands with less reliance on fire, which can be dangerous near populated areas, and mowing, which can spread exotic invasives. We urge PRNS to assemble a list of scientific papers that may document whether and which specific types of livestock operations might be useful in maintaining open grasslands and whether the use of agricultural equipment for those grazing operations might itself create a fire hazard that offsets to some extent any beneficial impact from grazing. We also urge PRNS assemble scientific papers to determine through pollen analysis or other methods, which of its lands were open grasslands in pre-european times and which have been converted to open

grasslands within the last 160 years. Once the pre-historic grasslands have been established, then a further study should be undertaken to determine which lands should remain open to further biodiversity in the park within the context of the park habitats role in regional biodiversity and which are need for fire protection.

Grazing: Economic Impact studies needed

We understand that cattle and dairy operations in PRNS may be important to maintaining the infrastructure of agriculture in West Marin (the critical mass theory). However, natural resources also have their own critical masses. Presently, numerous trucking and other agricultural support services are available for Marin ranchers. Many people, including the County of Marin, maintain that economically viable agriculture is critical to preserving the rural nature of West Marin and preventing the sprawl from urbanized areas that could reduce the natural resources of PRNS below their own critical mass. Yet while the County protests that economically viable ag is critical, it has at the same time, maintained policies that have led to the continued incremental growth of trophy farms and the removal of commercial grazing acreage for use as private horse operations. We urge the Park Service to conduct an economic study to determine whether the continued operation of beef and dairy operations under PRNS management play a significant role in keeping similar industries alive in West Marin. Just as the role of park's habitat in regional diversity is important, so it would be "penny wise and pound foolish" to try to preserve biodiversity within the park only to encourage suburbs to creep to the park's border and turn the Point Reyes peninsula into an unsustainable island.

Grazing: Phasing of any changes suggest by studies

In anticipation of these studies, we ask that natural Concept 2 be modified from its current proposal that *"beef and dairy operations would continue until the original permittees discontinue ranching operations."* First of all, it appears that ranching operations are actively pursuing an ever on-going evolution in re-defining ranching operations such that they may never discontinue. Second, it appears that "original permittees" is understood to include their descendents, so again under this Concept, ranching operations may never discontinue. We also note that under the 1980 GMP, some parklands outside of the pastoral zone were to be phased out of grazing, yet still 24 years later continue in grazing. Consequently, should the scientific studies determine that ranching activities should be decreased or re-located within the park, then a more definite timetable should be established that is consistent with the legal analysis of Congressional Intent, current laws that require protection of cultural resources and landscapes, and studies of the needs of the park's natural resources. This would be consistent with our over-riding concern that the Organic Act rather than current practice be the baseline from which all park actions are determined.

Other Comments

We understand that some level of generality is appropriate for this initial presentation of the pre-draft GMP, but these maps carry this concept so far as to make comment difficult. For example, the Marine Protected Area proposed in Concept 2 between Sculptured Beach and Bolinas Point appears (incorrectly, we believe) to extend further offshore than the Wilderness along the same stretch of coastline in Concept 1. Thus the public is unable to make meaningful comments when it is impossible to distinguish artistic license from intentional changes. We therefore urge PRNS to publish a table of percentage zoning changes which would enable the public to better understand each of the five GMP Concepts.

There exist other questions concerning the zoning. "Reserves" are described on page two, yet never show up again in the document. The existing federally wilderness areas of Concept 1 appear to extend off-shore into areas where CDFG allows fishing. If this mapping is correct, then there are at least two very different kinds of wilderness, since hunting within wilderness areas on shore would be prohibited. There is also no description of the regional context within which the Park's natural habitats may play key roles. This may be particularly relevant in regard to the proposed Marine Protected Areas some of which are located in customary local fishing grounds and all of which per CDFG will require the consent of local fishing interests.

Likewise the implications are not clear from what appears to be an overlay of the archeological zone over portions of the federally designated wilderness areas and it is not clear which laws trump which. We wish to inquire whether the archeological zone proposed to "*protect the...cultural identity of the Coast Miwok*" would contemplate plant and animal gathering rights, including those Miwok practices that encouraged desired plant and animal propagation, specifically fire. We also believe that cultural preservation has its own terms of art which are used through the document without the general public understanding what may be implied. For example, the current practice Concept 1 notes *that "archeological sites would be reviewed and stabilized"* whereas the natural resources Concept 2 notes that "*archeological sites would be documented and protected.*" The implied difference in management practice, if any, is nowhere explained.

Summary

We believe it is far too early for the "next step" as described on the last page of the Newsletter to be the publication of a "draft GMP/EIS (Winter 2005)." Instead, we urge PRNS to develop an additional round of Concepts using the Organic Act as the baseline for comparison. We specifically urge that Concept 2 be revised so that its proposed management actions more clearly support its claim that "*resource preservation and restoration would be the over-riding consideration.*"

Sincerely,

Gordon Bennett, Vice-Chair for the Sierra Club Marin Group