

June 30, 2021

The Honorable Deb Haaland  
Secretary of the Interior  
U.S. Department of the Interior  
1849 C St. NW  
Washington, D.C. 20240

***RE: Protect Point Reyes National Seashore from industrial agriculture and restore the park for all Americans***

Dear Secretary Haaland:

Our organizations – over **50** in number – have joined together to urge the Department of the Interior to stop the National Park Service’s imminent General Management Plan Amendment (GMPA) for Point Reyes National Seashore, a plan that favors special interests over the public use, protection and restoration of this National Park.

Point Reyes Seashore is one of the most popular National Parks in the nation. Only an hour’s drive from the San Francisco Bay Area, the Seashore receives more than two and a half million visitors each year. The 71,000-acre park and the officially protected areas that surround it—the Point Reyes State Marine Reserve and the Greater Farallones National Marine Sanctuary—harbor 1,500 unique species, of which 100 are listed as rare, threatened or endangered. The only National Seashore on the Pacific Coast, Point Reyes National Seashore is globally significant, designated by the United Nations as part of the Golden Gate Biosphere Reserve in 1988 in recognition of its vast array of plants, animals and ecosystems.

It has been three generations since Congress generously compensated ranchers for their land to establish the Point Reyes National Seashore in order to “save and preserve, for purposes of public recreation, benefit, and inspiration, a portion of the diminishing seashore of the United States that remains undeveloped.”<sup>1</sup> Yet sixty years later, commercial ranching remains entrenched at Point Reyes, degrading fragile coastal ecosystems and putting rare, threatened and endangered species at risk.. One-third of the park is essentially off limits to the public that owns it. All of which begs the question, “What will Point Reyes be like three generations from now?”

Background: Politics over preservation

Upon selling their land to the National Park Service a half-century ago, ranchers on the Point Reyes peninsula were allowed, “as a condition of such acquisition, to retain for himself and his or her heirs and assigns a right of use and occupancy for a definite term of not more than twenty-five years, or, in lieu thereof, for a term ending at the death of the owner or the death of his or her spouse, whichever is later.”<sup>2</sup> But through lobbying and political connections, the ranchers have been able to transition these reservations of use and occupancy to special use permits, repeatedly leasing back 28,000 acres of the park for their extractive operations. Today, the Seashore is perilously degraded as a result of nearly 6,000 cattle grazing year-round. Chronic

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<sup>1</sup> [Public Law 87-657](#)

<sup>2</sup> *Ibid.*

water pollution, habitat loss and livestock-wildlife conflicts continue to go unaddressed.<sup>3</sup> Extreme drought—the worst on record in 140 years—threatens water availability in the region.<sup>4</sup> As a result, mass die-offs of rare tule elk, fenced off from areas of the park leased for commercial activities, have taken place in recent years.

The new GMPA is the result of a 2016 lawsuit filed by three organizations over NPS's failure to update its 40-year-old General Management Plan—a plan written before climate change was recognized as a global threat. A legal settlement required the NPS to amend its outdated General Management Plan, and—for the first time in the history of the Seashore—to prepare an Environmental Impact Statement for the beef and dairy ranching at the Seashore.

Fast-tracked by the Trump Administration, the GMPA that now awaits your signature rewards a privileged few ranchers at the expense of the public and the park's environment. The NPS's preferred alternative (Alternative B) in this GMPA is neither science-based nor sustainable. It does not address the climate crisis and is not predicated on worsening drought conditions or the increasing risk of wildfire, two emerging realities at Point Reyes. This GMPA will only accelerate the overuse of scarce resources and environmental decline of Point Reyes National Seashore.

#### Drought conditions: Worsening with the climate crisis

Marin County, where the national seashore is located, has declared a drought emergency for the second year in a row. In May, the Governor of California declared a drought emergency for the entire state. Reservoirs in the county are barely half full and the region faces months of dry weather. Persistent drought—compounded by the climate crisis—is barely mentioned in the GMPA or the Environmental Impact Statement (EIS). What's more, groundwater supplies are exhausted. Yet last fall the NPS permitted a dairy rancher to draw up to 15,000 gallons of water a day from nearby wetlands to supply his herds and operations.<sup>5</sup> Incredibly, no environmental analysis was conducted prior to the daily pumping from sensitive wetland habitats.

#### Tule elk: Decimating a rare and native species

More than 150 tule elk have died so far this year due to drought at Point Reyes. Elk deaths in 2021 are likely to exceed the terrible die-off in 2012-2014 when 253 tule elk—over half the herd in the “elk preserve” on the Tomales peninsula—perished during an extended drought. The NPS accepts these die-offs of native wildlife as “a natural fluctuation in population” in response to available resources. But, in fact, these drastic variances in elk population occur because they are confined behind a fence that prevents them from reaching food and water that the NPS leases to commercial cattle and dairy ranches. The two unfenced Point Reyes elk herds have not experienced these mass die-offs, even during prolonged periods of drought. To make matters worse, the GMPA calls for the killing of “excess” tule elk that interfere with business-as-usual beef and dairy operations within the Seashore.

The new GMPA endorses these anti-wildlife policies despite the fact that there are more cattle at Point Reyes Seashore than there are tule elk in the world.<sup>6</sup>

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<sup>3</sup> California Coastal Commission (2021), [“Th6b - Staff Report for CD-0006-20”](#).

<sup>4</sup> National Oceanic and Atmospheric Administration (2021), [“NIDIS - Drought Conditions for Marin County.”](#)

<sup>5</sup> National Park Service (2020), [“J Ranch Emergency Drought Water Use, PEPC 97923”](#).

<sup>6</sup> California Department of Fish and Wildlife, [“Tule Elk”](#).

### Climate change: We must act now

Overwhelming scientific evidence points to greenhouse gases and species extinction as twin threats to a livable future. National parks—America’s most revered lands and waters—play a vital role in meeting these challenges and educating the public. At Point Reyes Seashore, the NPS is moving in the opposite direction. The GMPA will extend ranchers’ leases for at least two more decades, with the potential to renew indefinitely. According to a 2010 NPS study, *Climate Friendly Parks; Point Reyes National Seashore Action Plan*, livestock at Point Reyes are responsible for 62 percent of the Seashore’s greenhouse gas (GHG) emissions.<sup>7</sup> The 2020 Environmental Impact Statement that underpins the GMPA confirms that ranching remains by far the largest source of GHG emissions in the park, with emissions estimates that are double those calculated in the previous 2010 study. And beef and dairy ranches on lands managed by Point Reyes National Seashore account for 6 percent of Marin County’s total GHG emissions.<sup>8</sup>

### Diversification: Compounding the problem with new species and crops

Under the pending GMPA, ranchers will be allowed to introduce sheep, goats, pigs and row crops to Point Reyes, as well as mobile slaughter facilities--none of which were ever permitted before. This diversification of agriculture—particularly during Marin’s worst drought on record—will further disrupt ecosystems, jeopardize wildlife habitat, and impact wildlife behavior, as park predators (raptors, owls, bobcats, coyotes, foxes, badgers and the occasional mountain lion) will be drawn to smaller livestock.

The Park Service’s choice to prioritize ranchers over the health of an entire national park ecosystem flies in the face of its mission to protect and preserve the park’s natural resources. There are many other examples of this preferential treatment: the ranches in the Seashore are subsidized by taxpayers; the ranchers pay below market for grazing fees; the housing which, along with much of the ranching infrastructure, is maintained by the NPS at public expense; the Park Service dedicates staff positions and budget to ensure ranch businesses survive, despite declining demand for dairy and beef. Meanwhile visitor services, park improvements and public programs depend on funds raised by the nonprofit Point Reyes National Seashore Association.

### The plan: Unsupported by science or the public

In addition to turning a blind eye to the climate impacts of livestock operations in this coastal park, the NPS plan acknowledges— but dismisses—the ecological costs of ranching, including soil erosion, invasive plants, loss of native habitat, wildlife harm and abuse, the contamination of freshwater and marine environments with fecal waste from cattle, and ecological stress due to water deficit. Last month, the California Coastal Commission found significant spillover effects to the Coastal Zone from ranching related to water quality and marine resources, and made its consistency determination contingent on the NPS mitigating water pollution, providing drought and elk management updates, and addressing the climate impacts of ranch operations. These conditions must be met before re-issuing leases at the Seashore.

At the same time, the Park Service has categorically dismissed public opposition to the GMPA. It received more than 7,600 public comments, of which 91 percent opposed ranching and killing

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<sup>7</sup> National Park Service (2010), [Climate Friendly Parks: Point Reyes National Seashore Action Plan](#).

<sup>8</sup> National Park Service (2020), [“Point Reyes National Seashore 2020 Final GMPA/EIS”](#).

tule elk<sup>9</sup>, while the California Coastal Commission received more than 45,000 public comments opposed to the GMPA.<sup>10</sup> Despite dozens of editorials, op-eds, investigative reports, petitions and protests criticizing its ranching plan, the NPS has not wavered from nor modified Alternative B, the plan ranchers and their industry advocates have pushed for since 2009.

Cultural heritage: Ranching history is honored. Native American history is not.

The NPS abandoned its plans to preserve the Seashore's Coast Miwok heritage, withdrawing its application to the National Register of Historic Places to establish Point Reyes National Seashore as an Indigenous Archeological District.<sup>11</sup> Instead, the NPS pursued a Historic Ranching District, which was added to the National Register in 2018. The designation enshrines the Seashore's 150-year ranching history by dedicating 22,237 acres of the Seashore and 14,127 acres of the Golden Gate National Recreation Area to the official list of buildings, structures, sites, objects and districts worthy of preservation.

The history and culture of the original inhabitants of this region, the Coast Miwok people, are largely neglected, though they have lived in the region for millennia. Native voices remain underrepresented in the Seashore, and are not reflected in the park's management or interpretation.

Restore Point Reyes National Seashore: It's time for the park to truly be a park

The Organic Act that established the National Park Service requires that it manage park resources "in such manner and by such means as will leave them unimpaired for the enjoyment of future generations."

To fulfill this mandate, we respectfully ask the Department of the Interior to take these critical steps:

- Reconsider the NPS's proposed preferred alternative for the GMPA, Alternative B, due to the inadequacy of the environmental review required by the National Environmental Policy Act. (We note that Alternative F, identified by the NPS as the environmentally superior alternative, is the only alternative that conforms with the NPS Organic Act. Alternative F received the most public support of all the alternatives, limits climate impacts, and restores biodiversity.)
- Reverse environmental injustice by engaging with Coast Miwok people and supporting their culture, history, and traditions in the park.
- Immediately stop diverting water from wildlife to livestock.
- Disallow culling of tule elk for the sake of commercial ranching.
- Remove the Tomales elk fence that prevents tule elk from accessing forage and water.
- Expand public access – not private ranching – on these national parklands.
- Re-employ ranch workers, and established a diverse Youth Corps to help restore the park.
- Increase representation of Hispanic, Black, and Coast Miwok and other tribes as employees, consultants and advisors.

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<sup>9</sup> San Francisco Chronicle (2020), ["At Point Reyes, the contest is elk vs agriculture. The people vote elk."](#)

<sup>10</sup> Resource Renewal Institute (2021), ["Public Comment Analysis for California Coastal Commission Federal Consistency Determination for Point Reyes General Management Plan Amendment"](#).

<sup>11</sup> Pacific Sun (2021), ["Tamál Húye: Coast Miwoks Fight for Recognition of Point Reyes' Indigenous History."](#)

Thank you very much for your attention to this urgent matter.

Sincerely,



Deborah Moskowitz  
President  
**Resource Renewal Institute**

*Signing on behalf of*

**Action for Animals**  
Eric Mills

**Alameda Creek Alliance**  
Jeff Miller

**Avocet Research Associates**  
Jules Evans

**California Institute for  
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Daniel Glusenkamp

**California Native Plant  
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Nick Jensen

**Californias for Western  
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**Center for Biological  
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**Center for Large Landscape  
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Greg Tabor

**Coalition to Protect  
America's National Parks**  
Phil Francis

**Coalition to Save Point Reyes  
National Seashore**  
Diane Gentile

**Committee for the  
Preservation of Tule Elk**  
Bruce Keegan

**Defense of Place**  
Nancy Graalman

**Endangered Species  
Coalition**  
Tara Thornton

**Environmental Protection  
Information Center**  
Thomas Wheeler

**ForELK**  
Diana Oppenheim

**Gallinas Watershed Council**  
Judy Schriebman

**Golden Gate Audubon  
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Laura Cremin

**Great Old Broads for  
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Lauren Berutich

**In Defense of Animals**  
Marilyn Kroplick

**Klamath Forest Alliance**  
Kimberly Baker

**Marin Chapter of California  
Native Plant Society**  
Carolyn Longstreth

**Miyoko's Creamery**  
Miyoko Schinner

**Northwest Arkansas  
Audubon Society**  
Carol Joan Patterson

**Nuestra Tierra Conservation  
Project**  
Angel Peña

**NY4WHALES**  
William Rossiter

**Oceanic Preservation Society**  
Courtney Vail

**Old-Growth forest Network**  
Joan Maloof

<b>Patagonia</b> J.J. Huggins	<b>PETA</b> Ingrid Newkirk	<b>Petaluma Wetlands Alliance</b> John Schribbs
<b>Planning and Conservation League</b> Jonas Minton	<b>Point Reyes Safaris</b> Daniel Dietrich	<b>Project Coyote</b> Camilla Fox
<b>Public Employees for Environmental Responsibility (PEER)</b> Jeff Ruch	<b>Public Lands Conservancy</b> Tom Baty	<b>Public Trust Alliance</b> Michael Warburton
<b>Public Trust Water</b> Daniel Heagerty	<b>Rancho Campasion</b> Miyoko Schinner	<b>The Rewilding Institute</b> John Davis
<b>Save North Petaluma River and Wetlands</b> Taryn Obaid	<b>Shark Stewards, a project of Earth Island Institute</b> David McGuire	<b>Sierra Club</b> Olga Bolotina
<b>Silver Reaction Media</b> Tony Sehgal	<b>The TreeSpirit Project</b> Jack Gescheidt	<b>Turtle Island Restoration Network</b> Todd Steiner
<b>Vital Actions</b> Tim Rusmisl	<b>Watershed Alliance of Marin</b> Laura Chariton	<b>Western Watersheds Project</b> Erik Molvar
<b>WildCare</b> Alison Hermance	<b>The Wildlife Trust</b> Ed Loosli	

Cc: Department of the Interior Office of Intergovernmental and External Affairs Deputy Director, Danielle Decker; Point Reyes Superintendent Craig Kenkel; U.S. House of Representatives Natural Resource Subcommittee on National Parks, Forests, and Public Lands; Marin County Board of Supervisors; California Coastal Commission; California Director of Fish and Wildlife Service; Charlton Bonham, California Secretary for Natural Resources, Wade Crowfoot.

Attached: Fact Sheet

## POINT REYES NATIONAL SEASHORE FACT SHEET

- Established by Congress in 1962, Point Reyes National Seashore, now designated an International Biosphere Preserve by the United Nations, is home to over 100 rare, threatened, or endangered species of animals and plants. This is the only National Park unit where Tule elk, a unique California species brought back from the verge of extinction, can be found. Located near a major metropolitan area, the Seashore draws 2.2 million annual visitors.
- In 1978, Congress enacted legislation for both Point Reyes and Golden Gate providing standardized language for the leasing of land for agricultural purposes (16 United States Code [U.S.C.] §§ 459c-5(a) and (b) and 460bb-2(j)). These amendments *may allow* NPS to lease agricultural lands so long as they do not impede the Secretary's ability 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.*
- Today, 24 families have exclusive lease/permits or Reservations of Use and Occupancy on approximately 18,000 acres of Point Reyes and 10,000 acres of the north district of Golden Gate. Approximately 2,400 animal units of livestock for beef ranching and 3,315 dairy animals are currently permitted. Eighteen lease/permits include residential uses specific to on-site ranch operations.
- Per a 2010 Climate Friendly Parks study conducted by the National Park Service, the largest emission sector for Point Reyes National Seashore, totaling 12,533 MTCO<sub>2</sub>E, resulted from agricultural activities within the Park boundaries, including methane produced by cattle and the decomposition of animal waste in storage ponds.
- Droughts in California and Marin County [continue to shift water demand and water supply](#). Based on the number of permitted cattle in the planning area, the National Park Service estimates that the beef operations use approximately 12,000 gpd to 34,800 gpd, and the dairy operations use approximately 75,914 gpd to 175,695 gpd, for a total water usage of approximately 32 million gallons (98 acre feet) to 77 million gallons (236 acre feet) per year. Despite the increasing frequency of drought and the imminent water conservation measures in Marin County, the Park Service and ranchers plan to develop up to 25 new springs, 40 livestock pipelines, 30 watering facilities, and 24 pumping plants over the next 20-years.
- In 2015, the National Park Service (NPS) announced that half the elk herd behind the elk fence at the northern end of the National Seashore died due to the drought and their inability to search for adequate forage and water. The elk fence was erected to prevent the elk from grazing grass leased to ranchers. In 2016, the Resource Renewal Institute, the Center for Biological Diversity, and Western Watersheds Project filed a complaint against the NPS in the Ninth Circuit regarding violations of the Administrative Procedures Act. [The case can be found here.](#)
- As a result of litigation and a [multi-party Settlement Agreement](#), NPS agreed to prepare this GMP Amendment and EIS addressing the management of the lands currently leased for ranching in the park. The Settlement Agreement requires NPS to evaluate three alternatives in the EIS—no ranching (Alternative F), no dairy ranching (Alternative E), and reduced ranching

(Alternative D)--in addition to the No Action alternative (Alternative A) and two other alternatives (B and C) developed by the NPS.

- Under Alternative B, the NPS “Preferred Alternative,” the National Park Service is planning: to extend 20-year leases for ranchers (and a path for succession if a rancher decides to give up their lease); diversification of livestock including sheep, goats, free-range chickens, and pigs; expansion of the agricultural footprint with 2.5+ acres of non-irrigated\* row crops (e.g., artichokes) at each ranch. In addition, ranches would be allowed to turn historic farm buildings into Air BnB-like farm stays, bring mobile slaughter facilities into the National Park to process their livestock on-site, and develop farmstands in the park. Finally, the plan would allow the NPS to maintain the elk fence at the northern end of the National Seashore and keep the free-ranging Drakes Beach herd at an artificially low population level. All of these changes are to help the subsidized ranching operations mitigate the dynamics of the beef and dairy markets.
- The NPS received more than 7,600 public comments on the draft plan last fall. [91 percent of comments opposed commercial ranching](#) in the park and objected to the NPS’s plan to kill native elk that ranchers complain eat grass reserved for their cattle.
- The Trump administration singled out the Point Reyes GMPA/EIS process as the only National Park Service planning process underway that should be expedited and completed by January 20, 2021.
- The California Coastal Commission (a state agency that was required to conduct a consistency determination) received more than 45,000 public comments critical of the NPS plan and its timeline, which denied the Commission sufficient time to analyze the impacts of commercial ranching on the State’s coastal resources.
- The local tribe, the Federated Indians of Graton Rancheria, have also weighed in on this planning process, submitting multiple letters to the California Coastal Commission regarding their consultation with the NPS as well as their desire to address ranching permits, elk management, cultural resource preservation, and the implementation of traditional ecological knowledge at the National Seashore.
- In addition, [more than 100 national conservation and environmental justice organizations signed a letter](#) asking the Coastal Commission to withhold its approval of the plan pending further analysis.
- In their recent staff report released prior to the April 2021 hearing, the California Coastal Commission identified issues with water quality and a lack of reporting regarding water quality since a [2013 NPS study](#) revealed that Point Reyes National Seashore has some of the [most polluted water in the state of California](#).
- The NPS recently issued a press release stating that, once again, 152 tule elk behind the elk fence at the northern end of the National Seashore died due to forage and water issues compounded by the drought. The former plaintiff group [responded](#). Conservation groups submitted an [APA petition](#) to the NPS regarding the elk fence, which the NPS has refused to respond to.