March 3, 2021

Superintendent Craig Kenkel
Point Reyes National Seashore
1 Bear Valley Road
Point Reyes Station, CA 94956

RE: Request for an introductory meeting to share concerns regarding Point Reyes National Seashore

Dear Superintendent Kenkel:

I am writing on behalf of Resource Renewal Institute to welcome you to Marin and to Point Reyes National Seashore, and to request a meeting to learn about your vision and share our concerns for Point Reyes National Seashore.

The Resource Renewal Institute (RRI) is an environmental nonprofit organization located in Mill Valley, California. The organization’s mission is to foster innovative solutions for increasingly complex environmental problems, and to test new ideas. This innovation focuses on sustainable practices and solutions to natural resource management. RRI has programs focusing on advocacy, education, organizational development, policy analysis, and applied research. RRI has successfully incubated and nurtured new programs and strategies to improve our environment and well-being, and leaders who have become catalysts for change.

Environmental leadership and inventive land and water management practices are at the heart of RRI’s work. For example, Fish in the Fields is an integrated agricultural land use system with implications for carbon sequestration, protein sourcing, and ocean conservation. Defense of Place and Public Trust Alliance are organizations that uphold the inviolability of protected lands through policy analysis and collaboration with citizen activists nationwide.

Huey Johnson, the founder of RRI, was involved in issues in Point Reyes since he moved to Marin decades ago. In the 1970s, Huey founded the Trust for Public Land and, through that organization, acquired various parcels from the RCA Corporation in the 1970s. For example, in 1976 and 1977, the Trust for Public Land announced the purchase of 2,300 acres (G Ranch and what is now Niman Ranch/Commonweal area) of coastal Marin property for eventual inclusion into the Golden Gate National Recreation Area and Point Reyes National Seashore.

As you may know, RRI has been an active stakeholder in public deliberations regarding the past and current management of Point Reyes National Seashore, as well as the concerning proposals before the public today.

As we have shared via public outreach and correspondence with staff at Point Reyes National Seashore on numerous occasions, we remain troubled by routine lease violations and lack of enforcement of leases (and special use permits and letters of authorization) held by commercial beef and dairy ranching companies operating on federal lands managed by the National Park Service at Point Reyes National Seashore (PORE) and the Golden Gate National Recreation Area (GOGA).
In the past, RRI has shared our concerns regarding overgrazed (based on residual dry matter standards) and potentially overstocked pastures (based on spot counts by public citizens and National Park Service employees in documents obtained via a Freedom of Information Act request) in both PORE and the GOGA. Furthermore, our 2016 complaint also raised concerns about troubling illegal signage used to deter the public from exploring lands within what is presently the pastoral zone, as well as routine discoveries of cattle buried at PORE, cattle carcasses found in ditches that run into Drake’s Estero, as well as wildlife (e.g., ravens, coyotes, etc.) feasting on cattle carcasses that were not removed from the premises of various ranches in PORE.

Since the 2016 complaint was settled in July of 2017, enforcement of lease violations has not improved. Throughout 2018, cattle have been found grazing in various sensitive habitat areas, including Abbott’s Lagoon (Sept. 15) and Schooner Creek (December, 20). In January of 2019 we received reports of a rancher’s guard dog in the street approaching vehicles of public visitors at C. Rodgers Ranch. Once again, on November 29, 2019, cattle (presumably from G Ranch) were in the wetlands at Abbott’s Lagoon, defecating and consuming wetland plant species. (Some photo documentation of these problems is included in Attachment A.)

In recent months, enforcement has appeared to have gotten worse. On November 27th, 2020, RRI received a report of a commercial hog operation at A Ranch. Such an operation violates the agreed upon uses of the premises as set forth in Article 4 of the A Ranch lease. Please let us know how the NPS responded and how the company at A ranch was held responsible for this lease/permit violation.

In the weeks that followed, between November 26th and December 7th, nearly a half dozen individuals contacted RRI to share that commercial agriculture operations received “emergency permits” to extract from what surface water remains from various wetland ecosystems in the planning area. Pumps have been found between Abbotts Lagoon and Kehoe Creek, siphoning even more water from numerous freshwater emergent wetlands and freshwater forested/shrub wetlands, which can be found in the US Fish and Wildlife Service’s National Wetlands Inventory. These wetlands provide a crucial water supply for the Riverine intermittent streambed and Riverine tidal drainage at Kehoe Beach. (Some photos documenting this problem are included in Attachment A.)

Another member of the public alerted us to a new well that has been established directly across from Abbott’s Lagoon, within the zone of a freshwater emergent wetland that feeds the lagoon. Abbotts is one of the most important water features in the planning area, and RRI is deeply concerned that the removal of more water from the coastal watershed compounds documented concerns at Abbott’s Lagoon, such as eutrophication of water resources due to high nutrient input from the ranching operations. We are aware that, due to drought conditions in the National Seashore, the NPS may have issued emergency permits to allow for the pumping of sensitive surface waters within PORE. We request that the NPS explain to the public how the NPS plans to provide commercial ranches with additional water resources without jeopardizing the water availability for wildlife and hydrological functioning of natural systems.

Just a few weeks after we were alerted to the various new pumping operations, on December 23rd, 2020, the Point Reyes Light released a story about an illegal barley operation for Elk Fence Distillery at Kehoe Ranch. Has NPS responded with an investigation and held the company at the Kehoe ranch responsible?
To start the new year, on January 14th, the public again encountered undisposed cattle carcasses on F Ranch at PORE. (We believe the park was notified the very same day, but more than two weeks later a carcass remained, along with an abundance of ravens and a scavenging coyote.) *(See Attachment A for photo.)* What is the NPS’s process for addressing lease violations under Article 14 of each respective lease, and why have such violations have rarely been mitigated?

In addition, in late this January we were made aware of the erection of new fencing that harms wildlife. This fencing is inconsistent with basic range management requirements for other federal land management agencies who have lower duties to wildlife. We are disappointed that the NPS/ranchers are rushing to install new, harmful fencing that is inconsistent with the proposed efforts to improve wildlife conditions as described in PORE’s General Management Plan Amendment / Final Environmental Impact Statement *(see example photos of the new fencing from the Sierra Club SF Bay Chapter’s letter dated February 4, 2021, in Attachment A)*.

On January 30th, we received notice of 50 sheep at M ranch. *(See example photo in Attachment A.)* While this may be the maximum allowed under the “pet” clause in each of the leases, we remain doubtful these “pets” were not livestock for commercial production. How does NPS determine whether livestock are kept for personal or commercial purposes, and has it investigated this issue related to M ranch?

In addition to the myriad lease violations that have been documented over the last 7 years and which the NPS has previously been made aware of on numerous occasions, we hope to have a productive conversation about the difficulty the NPS has had with the protection of the snowy plover habitat and ongoing difficulties in successfully implementing raven deterrence best management practices at PORE. Additionally, we hope to learn more about water quality testing at PORE. Finally, we would like to have a full discussion about the opportunities to center and uplift a more complete and enduring cultural history at Point Reyes, namely that of the Coast Miwok.

We recognize that you are inheriting many of these issues, which is why we are bringing them to your attention. We want to support the NPS to ensure problems don’t continue under your watch. We greatly appreciate your time, welcome your new leadership, and look forward to a robust discussion on the aforementioned topics.

Sincerely,

Chance Cutrano  
Director of Programs  
Resource Renewal Institute
ATTACHMENT A: Photo Documentation of Concerns at Point Reyes National Seashore

Cattle grazing at Abbott’s Lagoon (we have videos of them walking through the lagoon)¹

Cattle standing in Abbott’s Lagoon and grazing 11/29/2019

¹ Special status species, including amphibians and reptiles, can be harmed or killed by trampling due to concentrations of cattle in these areas. Fish experience adverse impacts from increased turbidity, sedimentation and alternative of stream and other watershed habitat associated with grazing in these riparian corridors. In addition, the concentration of cattle in these fragile areas contribute water quality challenges documented at Abbott’s Lagoon, such as eutrophication due to manure runoff.
Cattle eating vegetation in Abbott’s Lagoon on 11/29/2019
Pumping of freshwater emergent wetlands and freshwater forested/shrub wetlands at the Kehoe Ranch. These wetlands are integral water supply for the Riverine intermittent streambed and Riverine tidal drainage at Kehoe Beach. Photo taken on 12/7/2020
Newly erected pumps in within the zone of a freshwater emergent wetland that feeds Abbott’s Lagoon. Photo taken on 12/7/2020.
The remains of a cattle carcass that had not been removed from F Ranch for over a month, even after the National Park Service was notified and responded on 1/14/2021

New fencing on land leased/permitted to A Ranch for cattle grazing, which is shared with the Drake’s Beach Tule elk herd. An increase to 7-strand barbed wire fences from previous 5-strand fencing increases hazards and barriers for wildlife, hindering daily wildlife movements, access to forage and water, and resulting in injury or death should wildlife collide or become entangled.
Newly placed strands of barbed wire on fencing that was previously adapted to support the free and safe movement of the free-ranching Tule elk herd at Drake’s Beach.

“Pet” sheep out to pasture at M Ranch on 1/30/2021