

February 19, 2004

Superintendent Don Neubacher
Point Reyes National Seashore
Point Reyes Station, CA 94956

Dear Superintendent Neubacher,

On behalf of the 1000 members and Board of Directors of the Environmental Action Committee of West Marin, I would like to thank you for the opportunity to comment on the Point Reyes National Seashore (PRNS) General Management Plan (GMP) Update Concepts Newsletter 2003.

Overview

Our over-riding concern and comment is that the guiding vision behind the GMP changes should be:

- 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,"* and
- The mission of PORE, as expressed in P.L.87-657, and expanded upon in P.L.94-544: *"to save and preserve...a portion of the diminishing seashore of the United States...without impairment of its natural values, in a manner...consistent with, based upon, and supportive of the maximum protection, restoration, and preservation of the natural environment."*

Of the five Concepts, Concept 2 (Special Emphasis on Preservation and Restoration of Natural Resources) is the closest to the Park's mission statement. However, even Concept 2 falls short because it is not ambitious enough; the changes it proposes do not go far enough to achieve the vision it purports to represent. Following are some suggestions for a revised Concept 2.

Trails

Trail expenditures should be prioritized on the basis of a plan to make the entire trail system environmentally sound. The GMP identifies 10 "line item" trail construction projects with an estimated cost of \$2.52. million. These projects represent less than 10% of the Park's 147 miles of trails. Many important trails in need of restoration are not included, among them Bear Valley Trail and Coast Trail Service Road, both of which the Trail Inventory notes need new culverts and bridges in order to permit the migration and spawning of endangered fish species.

Impacts of existing trails on natural resources should be mitigated by restoration or retirement before new trails are considered.

It appears that in all proposed Concepts, even Concept 2, 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.” The criteria for funding priorities emphasize replacement and rehabilitation, omitting the option of returning poorly designed trail to natural conditions. Yet, poorly designed roads and trails have been shown to be significant contributors of excess sediment that impairs salmonid breeding habitat. With Tomales Bay having been declared impaired by excess sediment, repairing or retiring eroding trails should be a higher priority than building new ones. The criteria also prioritize trails hazardous to visitors but not to endangered species and trails that provide critical links to regional trail systems but not those that provide critical links to endangered species breeding habitat. In addition, more emphasis should be given to eliminating duplicative roads and trails. New trails should not increase the burden on Park maintenance and natural resources, and should only be considered if they reduce (not merely fail to add to) these burdens.

The Giacomini Marsh is not an appropriate site for bicycle 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

As a matter of principal, construction in the Park should take a backseat to protection of natural resources. As a practical manner, every new structure burdens the Park with continuing liability for maintenance. Given that the Park does not now have the money to maintain existing buildings, 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. The information provided regarding existing and proposed structures for all 5 Concepts lacks clarity. 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

Based on our over-riding concern that the Organic Act and PORE’s own mission statement should function as the guiding vision for the Park, Concept 2’s statement that “invasive exotic species removal efforts would be expanded” is inadequate, and the other Concepts are even less satisfactory in their approaches to invasive species. Treatment of invasive exotic species removal should be determined by what would be required for their complete and permanent removal from the Park.

Grazing

It appears that the Cultural Zone in Concept 2 was defined by criteria based on historical significance. It should be defined with overriding regard to natural resources constraints. Grazing areas should be determined not by old fence lines or property boundaries, but by the

potential for preservation and restoration of native habitat. Likewise, in non-cultural landscape zonings, there may be a need for grazing as a tool to maintain open grasslands and decrease fire. As a result, what appear as solid color zoning areas might in practice be a mosaic of smaller areas either un-grazed or grazed under different regimes, but all based on the over-riding consideration of resource preservation.

In general, more information is needed before the future role of agriculture in the Seashore can be determined. The future of agriculture in the Park should be based on a complete understanding of the scientific, legal, ecological, and cultural conditions in the Park. Therefore, we urge the Park to provide the following:

- ❑ 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.
- ❑ A legal analysis (including actual legislation, testimony before committees, floor statements, and committee reports) to determine there exists any legal obligation on the Park Service to renew or extend leases for these existing agricultural or maricultural operations. The legal analysis should also consider 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, all of which have been suggested as ways of increasing income for agricultural operations within the Park.
- ❑ A study of the impacts of livestock grazing on biodiversity. 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.
- ❑ A study of the relation between livestock operations and fire. This should consider whether some 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.
- ❑ A study, using pollen analysis or other methods, to determine which Park lands were open grasslands in pre-European times and which have been converted to open grasslands within the last 160 years.
- ❑ A 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.

Other Comments

Regional Context

There is 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.

More detail is needed.

We understand that some level of generality is appropriate for this initial presentation of the pre-draft GMP, but these maps are so lacking in detail as to make comment difficult. For example, the Marine Protected Area proposed in Concept 2 between Sculptured Beach and Bolinas Point appears to extend further offshore than the Wilderness along the same stretch of coastline in Concept 1. It is not clear whether the difference is intended. We therefore urge PRNS to provide detailed information on the area zoned for different uses under each concept.

Questions regarding the Archeological Zone

- ❑ There is an apparent overlay of the archeological zone over portions of the federally designated wilderness areas: in such a case, which zoning would predominate?
- ❑ Would the archeological zone proposed to “*protect the...cultural identity of the Coast Miwok*” contemplate plant and animal gathering rights, including those Miwok practices that encouraged desired plant and animal propagation, specifically fire?
- ❑ The terms used are sometimes confusing. 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.

Questions regarding vocabulary:

- ❑ “Reserves” are described on page 2, yet never show up again in the document. The existing federally-designated 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.

Summary

The Environmental Action Committee of West Marin urges PRNS to address the concerns that we have raised before moving ahead to the point of developing alternatives. All Concepts should be consistent with the National Park Service mission, as stated in the Organic Act and with PORE’s own mission statement. 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,

Catherine Caufield
Executive Director