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29 November 2018

Re: Scoping Comments for EIS on GMP Amendment for Point Reyes National Seashore and GGNRA Planning Area

The Turtle Island Restoration Network submits these scoping comments on the Environmental Impact Statement (EIS) for the General Management Plan (GMP) amendment for lease lands at Point Reyes National Seashore (PRNS) and the north district of the Golden Gate National Recreation Area (GGNRA).

With these comments, Turtle Island seeks to gain additional scientific information regarding the ecological implications to native ecosystems and wildlife, in ways which are affected by existing and proposed actions of the GMP. Therefore, we ask that the PRNS pursue investigations to provide additional scientific information on the ecological impacts discussed in this comment letter regarding each alternative described in the GMP EIS.

Turtle Island Restoration Network believes that the priority for the GMP should be to improve native wildlife preservation, ecosystem health and function, and ecological integrity. For example, we believe that the management of Tule Elk at PRNS and GGNRA should occur in a way that promotes the health, function, and ecological role of the species on the landscape and simultaneously manages agriculture operations in ways that reduce the negative impacts to native wildlife and ecological processes. Under the existing managing regime, Tule Elk are harassed and shot, however, this is not consistent with the doctrine of native wildlife preservation. Therefore, Turtle Island Restoration Network believes that non-lethal methods should be applied to the management of Tule Elk, such as, allowing the separated herds to mix and migrate freely between PRNS and GGNRA, and relocating animals to other locations in the State where Tule elk herds exist and/or can be re-introduced. The EIS should provide scientific rationale for stating desired population levels of Tule Elk and investigate genetic consequences of leaving herds isolated from one another and preventing natural mixing of the three populations.

The National Park Service should provide scientific evidence regarding the impacts of cattle grazing on ecological processes and functions. Included in this analysis should be scientific investigations of cattle grazing on terrestrial food chains, including but not limited to: how grazing affects native grasslands and non-native grasslands, competition for forage with native wildlife, impacts of cattle grazing on terrestrial insect herbivory, interactions and effects of grazing on native predators, and effects of grazing on nutrient cycling (i.e. removing biomass from the landscape in the form of beef and milk).

Furthermore, the National Park Service should provide scientific evidence regarding the impacts of native Tule Elk grazing/browsing on terrestrial food chains, including but not limited to: how native Tule Elk herbivory impacts native grasslands and non-native grasslands, how Elk compete with native herbivores and omnivores for forage, interactions of Elk with native predators (i.e. supply documentation of predation and mortality of Elk), and effects of Elk presence on terrestrial nutrient cycling (i.e. retaining biomass on the landscape and its effects on soil nutrients, geo-chemical cycles and native wildlife species).

Turtle Island Restoration Network believes that effects of disease transmission to native terrestrial and marine wildlife from grazing cattle, dairy cattle, and domestic animals should be investigated and analyzed under the GMP EIS. Included in this analysis should be to identify scientific evidence for impacts of brucellosis transmission from beef and dairy cattle to Tule Elk and other native wildlife. Brucellosis is common among cattle and native ungulates on public lands and the presence and possible transmission of the disease at PRNS and GGNRA should be analyzed under the GMP EIS. Additional investigations of disease occurrence and transmission to native wildlife from dairy and beef cattle including but not limited to chronic wasting disease and mad cow disease and any known potential impacts of these diseases on native wildlife if they were found in cattle. Analysis and documentation of any known disease transmission found at PRNS and GGNRA should be included in the GMP EIS. The EIS should also discuss the ranching practice of spreading waste manure from dairy ranches (likely infected with Johne's disease) on rangelands, and discuss the risk this poses of spreading the disease to elk, other native wildlife and human visitors. Disclosure of all chemicals that could be present in the manure should be listed, including but not limited to, antibiotics, hormones, and vaccines given to livestock. Analysis of how these chemicals impact water quality, wildlife, and ecosystem health should be included in the EIS.

Diseases transmission from domestic animals to native wildlife is not limited to terrestrial ungulates. For example, thousands of Caspian seals (*Phoca caspica*) died in the Caspian Sea from April to August 2000 as a result of contracting canine distemper from domestic animals (Kennedy et. al 2001. *Emerging Infectious Diseases* v(6)(6) 637–639). Given the presence of dogs at core ranch areas at PRNS and GGNRA, investigations and analysis of the impacts of disease transmission from domestic house pets, including but not limited to canine distemper on marine wildlife, should be included in the GMP EIS.

Furthermore, domestic cats are present on Seashore ranches, and domestic cats are known to kill numerous species of mammals, reptiles, and birds. Analysis of the impacts of domestic cats on native wildlife at PRSN and GGNRA should also be investigated and analyzed under the GMP EIS.

The Park Service has stated that under the proposed alternatives included in the GMP, is the possibility of agricultural "diversification," which could include new livestock animals into the park, such as chickens, goats and sheep, or to grow agricultural crops. This would inevitably lead to conflicts between ranchers and the park's native wildlife. Therefore, the GMP EIS must identify what "diversification" would include and develop an analysis on the impacts that additional diversification would have on native wildlife, predators, food chain dynamics, nutrient cycling, and possible disease contraction between wildlife. In addition, diseases caused by animals that might be introduced as a consequence of diversification should be analyzed for impacts on native wildlife and Park visitors.

The EIS should discuss the adequacy and inadequacy of protection of natural resources under current lease operations (including ranching impacts on water quality, soils, wetlands, riparian vegetation, endangered species, and invasive plants); detail the history of compliance or lack of compliance with current and past grazing lease conditions; and discuss NPS enforcement and lack of enforcement regarding grazing lease violations.

The EIS should also include an inventory of ranch roads, a summary of the condition of the roads, and impacts of the roads to natural hydrology, water quality, ecological health, and native wildlife. Additional ranch infrastructure such as fencing, operated machinery, electric equipment, and communications technologies should be investigated and analyzed for impacts to native wildlife and ecological health and function. Ranch fencing that is not properly maintained can snare and tangle native wildlife, while also interrupting migration routes and impact predator-prey dynamics. An investigation and analysis of ranch fencing infrastructure and its impacts to native wildlife migrations, mortality, and behavior should be performed under the EIS.

Gas powered equipment and electric machinery used on ranches should be analyzed for impacts to native wildlife, such as sound and vibration disturbance on nesting birds, ground-dwelling and fossorial animals, and native predators. Ranches are electrified and contain satellite dishes, wireless internet, and phone receptor masts. Power lines that cross native vegetation can often cause fires and create other threats to public safety. Investigations and analysis of the electrified power lines for ranch infrastructure on PRNS and GGNRA should be evaluated; any documented failure, breaking, or hazard created from overhead power lines should be disclosed. Impacts to native wildlife behavior and ecological health from wireless communications has been documented elsewhere, and has been shown to be detrimental to wildlife species. For example, concentrated electro-magnetic frequencies emitted from mobile phone masts were shown to result in growth abnormalities and high mortality of tadpoles (*Rana temporaria*) (Balmori A. *Electromagnetic Biology and Medicine*. 2010. v29(1-2):31-5). Therefore, satellite dishes, wireless internet, and cell receiver masts at ranch core sites and within the greater Planning Area of the GMP should be evaluated for potential impacts to wildlife and ecosystem functions.

Stream channels, ephemeral and intermittent waterways should be inventoried for impacts from cattle and dairy operations and analyzed for impacts to native aquatic wildlife including but not limited to salmonids, and CA red-legged frogs. Analysis of ranch infrastructure, cattle trails, and grazed ranchlands on the conditions of all water bodies should be performed under the EIS. The analysis should include: whether excessive sedimentation issues and impacts to channel form and morphology have been identified in salmonid streams from grazing and what remedies have been implemented; whether damage, loss or inhibition of growth of riparian vegetation as a result of cattle grazing has been identified in salmonid watersheds; and results of monitoring for suspended sediment, fecal coliform, channel bed conditions, water temperatures, and riparian vegetation conditions in salmonid streams has been documented,

The EIS should investigate and analyze the condition of water quality within the Planning Area and identify any impairment due to grazing and ranching activities. This includes any water quality impairment in creeks, wetlands, and water bodies from livestock grazing and dairies. Additionally, fecal coliform, nutrients, ammonia and bacteria inputs to creeks and freshwater habitats from livestock grazing and dairies, and the impacts on aquatic wildlife and ecosystems should be analyzed, along with a description of what should be done to remediate the impairment of water quality by livestock grazing on water bodies within the Planning Area.

We appreciate the opportunity to provide comment on the GMP EIS. While Turtle Island Restoration Network does not support a specific Management Alternative at this time, our intention is to investigate the scientific impacts of grazing and dairy operations in their entirety on the native wildlife and ecosystems functions of the landscape within PRSN and GGNRA. Furthermore, we support actions to improve the ecological health and integrity of the landscape, which includes free-roaming Tule Elk herds, without the practice of fencing, removal, hazing, sterilization, or killing of Elk. We seek information to help inform the planning process to improve cattle ranching operations in the park in a way that does not damage ecosystems or negatively impact wildlife habitat, water quality, native vegetation, public recreation or the aesthetic beauty of the park.

Sincerely,

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