

Manage our National Parks for the Common Good: Remove Ranching and Restore the Point Reyes National Seashore

The National Park Service (NPS) is on the verge of adopting an amendment to its General Management Plan (GMPA) that would allow continued and expanded ranching activities in the Point Reyes National Seashore (PRNS). The issues embedded in this decision represent a microcosm of some of the most relevant and challenging threats facing society today, including: climate change and biodiversity, systemic racism, health equity, diversity, equity, inclusion and environmental justice for people of color, underserved communities, and people with disabilities, and how these various issues interact with the politics of economic growth.

Point Reyes National Seashore is on the ancestral homelands of Coast Miwok people. Occupations by the Spanish, Mexican and American governments resulted in many Coast Miwok and Pomo communities pushed out of their village sites to make way for missions and cattle ranches. The area of PRNS continues to hold significance for Coast Miwok people, Pomo and other California Indian communities who gather natural food sources from the coast as they have done for thousands of years. Kule Loklo a well-known recreated village and round house was used for years for annual gatherings of California Indian people for the Strawberry Festival and Maria Copa Honor Dance until 2019 when NPS decided to take the round house down due to deterioration.

In the early 1970s, once the federal government purchased all the land, including the ranches, necessary to create the park, the National Park Service hired consultants and spent considerable time reaching out to people of color and underserved communities "for whom, in rhetoric at least, the park had been created" according to historian John Hart in *San Francisco's Wilderness Next Door*. With its unmatched diversity of ecosystems and terrestrial, maritime and avian wildlife, Point Reyes would vie to be among the nation's most iconic parks.

Even more compelling for these planners was its proximity to a major metropolitan area. Accessible by public transportation and only a 1/2 hour to 2 hour drive from some 8 million people, this park was mandated to never charge an admission fee. It would be focused on providing a first class wilderness experience to people of color and underserved communities. These two groups due to a history of discriminatory and racist policies--as well as the high costs of visiting some of the more iconic national parks--are significantly underrepresented as a proportion of their overall population in benefitting from the national park experience. But that initial vision was significantly curtailed when the park's enabling legislation was amended in 1978.

The ranchers who had sold their properties years earlier under finite terms, succeeded in lobbying not only for a provision that would allow 5-year leases, but also restrict those leases to the ranchers and their family members. The amendment sets a dangerous precedent that puts the private commercial interests of a handful of well-connected ranchers above the laws that mandate natural resource protection in a national park or seashore.

The new amendment allows sheep, goats, chickens, row crops, mobile slaughtering, point of sale retail facilities, and lodging. Even guard dogs (dogs are otherwise banned from most areas of national parks because of the danger their scent, droppings and behavior can pose to native wildlife) will be allowed to protect these newly introduced farm animals against the park's native raccoons, foxes, bobcats, eagles and mountain lions. And one of the park's most iconic species--native tule elk, which were reintroduced in the park in 1978 (according to the park's own Environmental Impact Statement (EIS) they are decades away from reaching carrying capacity), will be killed as the ranchers deem them an "invasive species."

The ranchers will be given 20-year leases and are seeking options for renewal. The politicians supporting them say they believe they should remain in perpetuity. They have presented a number of "facts" that are driving the process in Congress. Claims have been made that ranching is ecologically and economically important to the region, that the ranches were always meant to stay in the park, that Congress has always expressed this intent, that ranching is necessary to maintain the pastoral zone due to the need to graze the invasive plant species introduced by ranching, and that most people want to leave ranching in place.

NPS's policy toward ranching perpetuates systemic racism. It celebrates the success of one culture while deemphasizing thousands of years of history of Coast Miwok-including their persecution during the period the land has been ranched. The NPS acknowledged Coast Miwok history by allowing 1.5 acres for a representative village--Kule Loklo. And they are in the process of restoring the last remaining 19th century Coast Miwok-built structures at PRNS. This is a glaring disparity when compared to the leasing of 28,000 acres¹ (1/3rd of the park) to ostensibly describe a 150-year history of the land that focuses on Euro-American ranches maintained and subsidized by NPS through taxpayer dollars.

It ignores the role ranching played in the brutally oppressive and racist history experienced by Coast Miwok people, Chinese immigrants and other people of color in the establishment of ranching at PRNS. The arrival of ranching on the Point Reyes Peninsula led to the taking of land from Coast Miwok people, their brutal subjugation and near annihilation, first by the Spanish, then Mexicans and then white Europeans. The extirpation of tule elk occurred during this period as well. Intensive farming and ranching caused severe environmental damage including siltation of Tomales Bay and the esteros.

The United Nations Intergovernmental Panel on Climate Change (IPCC) has warned of the danger that methane from cows plays in climate change. The NPS's own Environmental Impact Statement describe how ranching in the Park generates the equivalent of 24 thousand metric tons of CO₂ a year, six-and-a-half times the amount generated by all the car traffic of the over two and a quarter million annual visitors. Recent independent water testing showed dangerously high levels of fecal bacteria *E. coli* and *Enterococcus*. The more dangerous *Enterococcus* was found to be 300 times its safe levels in Kehoe lagoon. These health hazards to humans emanate

¹ Ranching in the Point Reyes National Seashore covers 18,000 acres over 1/3rd of the park. An additional 10,000 acres are ranched in the Golden Gate National Recreation Area on national park land that is administered by the Point Reyes National Seashore.

from the 130 million pounds of poop and urine excreted annually by privately owned dairy cows and cattle much of which the ranchers liquefy and spread over the ranch areas of the park. The results are similar to those found by the NPS when these waters were last tested in 2013. The County of Marin's Health Department was alarmed enough to post warning signs for the public. The NPS, claiming the county lacks jurisdiction, has removed the signs and will continue to let the public enter these areas unaware of the danger.

Rather than recognize Coast Miwok ecological practices and methods of stewardship of the land and nature, this amendment, according to the ranchers own statements, is a return to the "Shafter era" (1860s-1920s) when environmental damage from intensive ranching and farming as well as oppression against Indigenous and Chinese people to secure cheap labor was at its apex. The plan also ignores the NPS's history of discrimination against African American and Latinx communities and exacerbates factors that studies have shown prove a barrier to their visitation.

It was not an inclusive approach for a national park located in the state with the largest number of Indigenous peoples and recognized tribes in the nation, where only 1% of visitors to Yosemite are Black and where Latinx and African Americans, Asian Americans and Indigenous peoples are affected by health care disparities and systemic racism that has led to mortality rates from Covid-19 that are 2-3 times those impacting Whites.

The \$16 million the ranches produce each year is heavily subsidized by taxpayers and dwarfed by the \$369 million in tourist-related economic impacts generated annually by the park. According to a Griffiths University study quantifying the economic value of mental health benefits for those who visit national parks, the park generates well over \$1 billion in total economic value from improved mental health of the over 2.25 million annual visitors to the park. The Seashore's 1962 Enabling Act did not address the question of ranching being a permanent fixture in the park. And if Congress always meant for the ranches to stay they would not have been sold under finite terms. There are numerous examples of successful restorations of land grazed by cattle including Hart Mountain, the Channel Islands and in the Seashore itself with the Giacomini Wetland restoration. All the available data points to the public being overwhelmingly opposed to ranching in the park. The NPS's public scoping process saw over 91% against and only 2.3% favoring ranching.

The record shows regular contact between political staff, the NPS and ranchers and their lobbyists, but no direct outreach, as called for by National Environmental Policy Act's best practices in applying environmental justice review, to communities of color and underserved communities. This is a case of politically powerful interest groups driven to commercialize the most protected of public lands helping a handful of ranchers obtain a sweetheart deal to the detriment of the public interest.

We, the undersigned organizations represent Bay Area Mental Health groups, health care providers, social justice organizations representing people of color and underserved communities and some of the Bay Area's largest employers are committed to promoting public policies that are mutually supportive of all Bay Area residents. We believe that at a time when

our region is experiencing a deadly pandemic and the first waves of an ever growing number of climate change-driven disasters, forward thinking policies are necessary to help build community resilience, environmental sustainability and economic vitality.

The Point Reyes National Seashore is the only national seashore on the Pacific Coast. As a national seashore it is required by law to preserve its natural resources to the maximum extent possible. The NPS has acknowledged its responsibility to ensure our parks are accessible and welcoming to all Americans. Intensive year-round ranching in over one third of the park significantly impairs both these priorities. The unmistakable lessons seen in the disparity of outcomes among people of color and underserved communities in the Covid-19 pandemic must be addressed at all levels of government--including ensuring that our most protected of public lands provide the maximum health benefits possible to all visitors. Diversity, equity and inclusion--not commercial gain for a chosen few--must be the standard.

As a first step in the process of removing ranches to make way for PRNS to provide a diverse wilderness experience to people of color and underserved communities, and genuinely acknowledge Coast Miwok, Pomo and California Indian relationships to ancestral lands, we request that the Administration suspend the GMPA process (the Record of Determination should not be signed) for the Point Reyes National Seashore to allow for hearings that give voice to the many communities who've been excluded in this process. Expert witnesses from both sides should have the opportunity to present their case before Congress and the American people.