Point Blue Conservation Science

Conservation science for a healthy planet

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To Whom It May Concern:

Herein we submit a letter of comment from Point Blue Conservation Science on the draft Environmental Impact Statement for the General Management Plan Amendment and associated summary.

Point Blue Conservation Science (Point Blue; www.pointblue.org) works to conserve birds, other wildlife and ecosystems through science, partnership, and outreach. With a staff of 150 scientists, we partner with public and private natural resource managers on land and at-sea in California, across the Americas, and in Antarctica. In addition to our extensive work on public lands, we collaborate with more than 1,000 ranchers, farmers and others who manage over 400,000 hectares of working lands across California. Founded in 1965 as Point Reyes Bird Observatory, our organization's beginning was made possible through a partnership with Point Reyes National Seashore, who we continue to partner with today. Then and now, we are grateful to the park for their continued commitment to the study and conservation of natural resources.

We read with interest the draft Environmental Impact Statement (EIS) for the General Management Plan Amendment (GMPA) for the Point Reyes National Seashore and North District of the Golden Gate National Recreation Area (hereafter collectively "the park"). We appreciate the tremendous amount of effort that has gone into producing and evaluating the six alternatives. Given the strong public opinion on the issues at hand, we recognize the challenges the National Park Service faces in meeting multiple objectives and balancing multiple resource concerns, and we express support of the effort to address these complex issues. In this letter, we do not advocate for any one of the six individual alternatives, and we recognize that the park may select a final amendment that combines elements from multiple alternatives. With Point Blue's long history of collecting data within the park, and in California rangelands and coastal ecosystems more broadly, we instead offer considerations and recommendations on some of the specific elements of the six alternatives:

- **Habitat disturbance, biodiversity, and resilience.** In the absence of fire or other major disturbances to the landscape, grazing by livestock and/or by elk plays an important role in keeping grassland and coastal prairie habitats abundant in the park. If the grazing intensity and/or spatial distribution is reduced in the park, we recommend the park consider the long-term effects of the conversion of grassland and coastal prairie habitats to dense coastal scrub and/or forest, a process the park mentions is likely to occur and would have ecological winners and losers. We have conducted long-term monitoring of the effects of such a conversion at the Palomarin Field Station at the south end of the park, in an area that was partially in agriculture and grazing prior to becoming part of the park. We have documented extensive conversion of that area from open coastal scrub to Douglas-fir forest, resulting in considerable changes to the composition of the local bird community, including the local decline or loss of species associated with coastal scrub and prairies (Porzig et al. 2014).

Regardless of the alternative that is selected, maintaining a heterogeneous landscape with a diversity of vegetation types is likely to maintain the greatest biodiversity, ecological function, and resilience to climate change and other threats (Folke et al. 2004).

- **Grazing as a tool for targeted ecological management.** Managed or prescribed grazing can be used to achieve specific resource-management objectives such as creating and maintaining habitat for sensitive species and maintaining desirable plant assemblages. A 2010 study Point Blue conducted on grassland birds in coastal prairies in Sonoma County found that sites that were continuously grazed by cattle supported a greater diversity and abundance of grassland bird species than sites where livestock grazing had ceased (DiGaudio 2010). Hayes and Holl (2003) found that grazed coastal prairies supported higher native annual-forb species richness than un-grazed coastal prairies; and Henneman et al. (2014) found that native bunchgrass presence increased following prescribed rotational grazing. Within the park, grazing has been demonstrated to maintain native grasses and forbs in the presence of introduced plant species (Arceo et al. 2017). Under all ranching scenarios, we encourage the park to work with agricultural producers to establish biodiversity goals and have a shared understanding of the appropriate management actions for these areas, and manage for these goals in an adaptive framework.

- **Application of subzones within the Ranchlands zone.** We appreciate the inclusion of nuanced management subzones in Alternatives B-E. Poorly planned grazing in sensitive areas such as wetlands and riparian areas can negatively impact vegetation, erosion, and water quality, with subsequent impacts to bird abundance and diversity (RHJV 2004). Fencing riparian areas allows the park and its lessees to limit grazing access and control the timing, intensity, and duration of grazing within the riparian zone; and monitoring and adaptive management of the riparian zone can support this decision-making process. Additionally, active restoration of riparian-zone vegetation would provide multiple benefits to ecological function, including water quality improvement, erosion prevention, carbon sequestration, and habitat for wildlife (Dybala et al. 2019, Naiman et al. 2010).

- **Nesting landbirds in silage.** As cited in the draft EIS, Point Blue conducted a study in 2015-16 with the support of the park on the impacts of silage on breeding birds within the Point Reyes National Seashore. The study found that 7 bird species were either confirmed or likely nesting within the silage fields prior to when the fields were mowed, including 3 bird species of special concern (DiGaudio et al. 2016). This study also offered a number of management considerations for the park to review and weigh, although it was beyond the scope of the project or report to determine whether each consideration was compatible with park goals and ranching operations. If the park has not already done so, we recommend the park evaluate the efficacy of the management considerations summarized in the report from that study to determine if there are any appropriate actions that can be taken to reduce the impacts of silage harvesting on nesting birds.

- **Modifying ranching practices to minimize food subsidies for Common Ravens.** The park works on many levels to protect the federally-threatened Snowy Plover during the nesting season (e.g., seasonal closures, pet restrictions, public outreach, and practices to reduce impacts from ravens). Common Ravens remain the primary threat to Snowy Plovers within Point Reyes; they are also known to prey upon Common Murre nests. As mentioned in the draft EIS, the large Point Reyes raven population is supported by the abundant food resources accessible at some park ranches. Management actions that control ravens' access to these resources may lead to a smaller raven population size, thereby reducing their impact on vulnerable avian species like the Snowy Plover

(Roth et al. 1999). Under any ranching scenario, we recommend the park consider actions, many of which are outlined by the park in the draft EIS, that would reduce the subsidization of Common Ravens, resulting in benefits to plovers and other species upon which ravens prey.

- **Long-term perspective on Tule elk management.** We appreciate the park's efforts to reintroduce and maintain a population of a large California endemic species that had been extirpated. Tule elk play an important role in the ecology of the Point Reyes National Seashore, and the opportunity for users of the park to observe and appreciate these animals in the wild is valuable. We recognize that managing a wildlife population is complex, and that under any of the alternatives, including alternative F over the long-term, the park may be required to actively manage the elk population size. In the absence of a large population of predators, the elk population is likely to continue growing, increasing the potential for dangerous interactions with park visitors and on roads (both within and beyond the park), in addition to potential conflicts with other park resources. Given the strong public opinion on population management, we encourage the park to communicate frequently and openly about population management decisions.

- **Climate change.** We recommend the park's decisions on any of the alternatives, or individual elements of the alternatives, are made in the context of climate change. Climate change is already affecting, and will continue to affect, the ecology of Point Reyes over the long-term. For instance, bird populations are already impacted by mismatches in phenology and impacts on reproductive success and survival during critical life stages (Dybala et al. 2013, Nur et al. 2018). In addition, range managers will be increasingly challenged by extreme and variable weather conditions. The park can take actions now to help ensure wildlife and human communities are equipped to contend with these challenges, such as by undertaking restoration projects and other management activities that will improve ecological function, minimize the impacts of other ecological stressors, and maximize resilience.

In summary, we recommend the park consider management actions that are data-driven, incorporate pre-existing and future long-term monitoring, are adaptive in nature, and reflect a long-term perspective that allows a diversity of habitats, native wildlife, and the human communities who rely on and appreciate the park to thrive. We recognize there are many different stakeholders that bring unique perspectives to the park's history and future, including Coast Miwok, and we encourage inclusive and collaborative management with those groups. We acknowledge the complexity of the management decisions at hand, and the value of producing a management plan amendment that aims to achieve multiple benefits for both ecological systems and human communities in a changing world. We thank the park for the opportunity to comment, and we look forward to our continued partnership.

Sincerely,

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