



by Ansel Adams in *This Is the American Earth*

## SIERRA CLUB

Mills Tower, San Francisco 94104

May 30, 1973

Mr. Howard Chapman, Regional Director  
Western Region  
National Park Service  
450 Golden Gate Avenue  
San Francisco, California

Dear Mr. Chapman,

The Sierra Club is grateful for this opportunity to comment on the draft Environmental Impact Statement for Point Reyes National Seashore proposed wilderness area.

We hope that our comments and those of other groups will be taken into consideration before the final EIS is filed.

We are attaching our comments in a two-part statement: the first part deals with the concept of wilderness and why we believe it is important at Point Reyes. The second lists our comments to specific statements in the draft EIS.

Again, thank you for requesting our response.

Sincerely,

*Bob Rutemoeller*  
Bob Rutemoeller  
Chairman, San Francisco Bay Chapter  
Sierra Club

*Sonya Thompson*  
Sonya Thompson  
Sierra Club Point Reyes  
Task Force

**ONLY BACKPACKERS NEED APPLY?**

**a comment on 'Wilderness' designation for  
Point Reyes National Seashore**

Hard by the estuary kneels a man. He is not an old man, he is young, and like the young he has brought to the beach all of his world that is movable. Back in the parking lot is a car, loaded with blankets, beer, lunch, beach chairs, radios, thermos mugs and friends. He has gone to the estuary while his friends unpack. He is alone. And he is thinking.

Not being a deep or complicated man he is unable to formulate any great thoughts and he is soon content watching the life along the shoreline.

The morning is clear and crisp, the wind whips in over the sand dunes, fresh from the ocean, rippling the waters of the estero. The call of an unseen bird reminds him that he has ears and he listens. He hears birds, and bugs, and unknown things. And he hears the grasses. They hum to him. The more he listens, the clearer the hum becomes. The grass is whispering to him and he is listening. This young man, who is kneeling by an estuary, away from his friends, thinks he hears what the grass is saying. He thinks he hears, 'who will look after me? sighs the heron.' And the young man says, aloud, to no one, "I will".

Later the young man goes to the beach to look for his friends. He still does not wish to ponder great thoughts, or join a library. But on his way out of Point Reyes he will drive more carefully. And he will come back. Again.

Point Reyes National Seashore, the subject of books, articles, arguments and master plans, will there be anything left of you? When everyone gets finished tugging to the left, and the right, will the cliffs and the deer, and the esteros be as they have been since the time of west coast man began? If it is true that all things persist in their own beings, then Point Reyes will persist magnificently, for it has no enemies, save man. We, endowed with the touch of blacksmiths, must try to save it from ourselves.

But where do we fit in among the dunes and the tidepools?

There is a place for man here. Wilderness is only mighty to the eye of the hawk. Close up it is fragile, humble and afraid. For that reason alone it needs us. In our modern, mechanical world it needs a friend.

The Challenge we face today is to make it possible for us, the public, to enjoy the peninsula's natural values without destroying them. It may seem surprising that a stretch of coast only thirty miles from San Francisco can still be a candidate for addition to the Wilderness system. Were it not for the peninsular location and a lingering ranching commitment the case would doubtless be otherwise. Happily, however, the roadlessness and other credentials required under the Wilderness Act are still found in diverse areas within Point Reyes perimeter.

Also within the Point Reyes perimeter lies Black forest, southernmost outpost of the Northwest's Douglas fir; Mount Wittenberg, whose modest 1,407 foot summit is the peninsula's boldest; 25 miles of ocean and bayshore; sea lion coves; tidepools; and white cliffs

that may have prompted Drake of England to name this land New Albion. The peninsula's varied landscape --- with sand spit, mud flat, marsh, moor and forest --- supports a corresponding variety of wildlife. The distance inland from the cliff-scalloped Drakes Bay, where grey whales show their calves the spring passage from Baja California to Siberia and sea lions raise their pups, to fir clad ridges and canyons where a few mountain lions still rear their cubs, is a scant two miles. Yet the slender peninsula sustains 96 recorded species of mammals. The Point Reyes bird count of 399 species, 112 breeding, is one of the highest in the nation. In the estuaries more than 110 species of migrant shore and water birds have been seen en route to northern breeding grounds or southern wintering areas. The California murre's breeding colonies cover surf-pounded rocks in penguin-like crowds. Fisherman know the salmon and striped bass of Tomales and Drakes Bays. Shellfish include three species of clams and the prized abalone, possibly the richest beds on the coast. And despite its abutting of the mainland along 15 miles of the San Andreas fault zone, Point Reyes is distinctive in many of its wildflowers and other plants. Some are unique.

In attempting to change the designation of Point Reyes to 'Wilderness', there seems to be two main points of contention. Firstly, whether or not Point Reyes qualifies for Wilderness, and secondly whether the National Park Service would be able to service the area adequately and efficiently without motorized vehicles. This boils down to a problem of access. Access for the public and the Service personnel. We will start with the second problem first.

## ACCESS .... The Johnney House Dispute

There can be no denial of public access to Point Reyes. But if the public philosophy to public lands lies just to the left of 'whoopee' then some sane answer must be found. Wilderness is not meant to mean Prohibition. The nitty gritty of this problem as far as the public is concerned, is one of attitude. The public today has privileges that neither their fathers nor their grandfathers had. They have the privilege of time. Time to go places, to the cabin, the lake, the seashore. And they feel privileged to own things, cars, boats, dune buggies and trail bikes. They want these things, they have earned them, and they feel they have the right to use these things, without a lot of 'elitist do-gooders' saying 'nay'.

The change of designation for Point Reyes is not a move by the 'tennis shoes corps' to keep out the 'real people'. But real people must share one thing, responsibility. Not only for their own skins, they must aid in the responsibility that we all feel for Point Reyes. Point Reyes and the National Park Service should not have to try to meet the lurid claims made by advertisements promising fun, and boating, and tennis and golf, and acres to 'be yourself'. Under names like Ecological Reserves and Coastal Condominiums promoters are telling the public that the coast is solely to dune buggy and motor cycle on. We, the rest of the public, cannot support this kind of activity on public lands.

Does the word access have to negate the word solitude. No. At Point Reyes, at this very moment, both exist. A major paved road leads into the Park. Within twenty minutes an automobile can penetrate to the ocean, either at Limantour Spit or Point Reyes.

Unpaved roads, once used by the ranchers, (now by Park Service personnel) criss cross over the ridges and dip to the ocean. They are closed to public vehicular traffic, and they, along with the miles of trails, afford an excellent opportunity to take leisurely walks, either to the lakes or the meadows. Take a walk on a brisk spring morning, feel the sun, see the clouds and the rabbits, the deer. Pick a spot and sit for a while looking down at the ocean, moving, moving, do this, and we need talk of solitude no longer. It is there.

The National Parks Service states their need in terms of access quite clearly in their Environmental Statement, Revised Draft. To quote

"Access roads to all four existing backcountry camps are unpaved, and are closed to public vehicular access. Heavy duty trucks service the vault toilets, which require pumping and flushing every six months. Park Rangers use jeeps to patrol the camp areas every night for protection and control. Heavy equipment is brought into Glen and Coast camp areas for well drilling purposes. Power mowers are used in all four camps to cut grasses and control thistle buildup for fire control and visitor comfort. An average of twelve bags of garbage and litter are hauled out from each camp every week. Vehicles are used to quickly evacuate those inexperienced urban backpackers who become exhausted or suffer injuries.".....

Is all this really necessary? Are these arguments for access really valid? Other areas manage Wilderness Area programs like the above, without all that much access. It's done by horseback in other areas, why not here? As for emergency cares, the Wilderness Act allows for vehicular traffic.

Once again there must be use made of the backcountry and Wilderness area, but this cannot mean unlimited access. Heavy visitation during the dry season can denude areas of vegetation and cause erosion when heavy winter rains set in. In other Wilderness Areas limitations on numbers entering are being imposed or considered, a step that would seem logical in this case.

One last point about access, with or without Wilderness designation, trail use will remain virtually the same. This comes from the National Parks Service environmental statement. We cannot let the pristine beauty of Point Reyes become mired down in a 'johnney house' dispute. We need visitor facilities but more importantly we need Point Reyes. The choice seems obvious.

#### QUALIFICATION .....Wind, Fog and Sun.

What is Wilderness? There are as many definitions as there are seagulls. To some it's pathless, others it's uninhabited, and yet others think of it in terms of waste. There are arguments that say if you can see civilization, it cannot be wilderness, if the area has been timbered, or ranched, how can it be called wild. All these arguments have validity for those who present them. And under some of these conditions Point Reyes National Seashore would



not qualify for wilderness. Much of the timber was cut and is only now in the process of growing back. The area has been used to feed and water ranch stock. But if the timber is left alone, in twenty years there will be no one who could tell that it was ever lumbered. And the few cattle which remain on lands adjacent to the area designated as wilderness will not detract from its integrity.

On the other side, the argument of rejuvenation is championed... that if the area is left undisturbed, it would soon qualify under wilderness. This, too, is a valid argument for those who present it. But there is another premise, another interpretation of wilderness that has not been suggested, and it will be now. We asked, earlier, where do we, mankind, fit in? Perhaps here, under the heading of Timelessness, for Point Reyes can, indeed, be timeless. Here one can be freed from the tyranny of Greenwich Mean Time. There can be moments when life does not seem to be an endless procession of paydays, basketball games and red lights. And who can say 'nay'. Who has not felt the need for such a place. And who has not been there, at least once. There, at the oceans edge, lost in the surfs boom, or on a high hill as the wind sweeps the cobwebs of discontent from the inner ear, there, for a single moment the boss, and the mortgage, the whines of the family and the dogmatism of ourselves, is lost. There, you are. There are so few places of escape these days. And fewer, yet, where man can escape from himself.

The mystery of Point Reyes is subtle, and we are lifted out of ourselves to enjoy it. Let us not lose this fragile gift in a tug-of-war.

The National Park Service has published its Environmental Statement, Revised Draft. It is 48 pages of hard work and must have consumed many man hours. It has contained in it paragraphs of reason and common sense, and paragraphs of 'newspeak' and 'legalese'. It has been regarded with awe, by some, and called a 'boondoggel of considerable consequence' by others. Be that as it may. The fact is the National Park Service supports a Wilderness designation for 10,000 acres of the 64,000 acre park. It does not support Wilderness for the 10 mile Point Reyes Beach, the Limantour spit nor the Drakes Estero. Aside from the 10,000 proposed wilderness acres and four natural areas, just about everything is earmarked "Class III" - Natural Environment Area. Despite its sound, this Park Service category permits exploitive activity such as timber cutting and mining as well as road construction. The exploitive-permitting classification appears to have been applied far too sweepingly. It would be desirable to limit Class III to the remaining grazing lands and divide the rest between the more protective "Class IV - Outstanding Natural Area" and "Class V-Primitive."

Although National Parks are classed as natural areas, National Seashores, (Point Reyes) and Lakeshores are broadly classed as recreation areas. The service has also instructed its planners to automatically adopt Class III for most recreation area lands. But are the natural qualities of Point Reyes or Cape Cod less worth protecting than those of Acadia or Hot Springs National Park? Park Service policy should be revamped to give higher priority to protecting natural values wherever they are found.

Also in the N.P.S. Environmental Statement, Revised Draft, the mineral rights and the specter of drilling are brought forward, without a full explanation. The mineral rights are given, "provided that no well or drilling operation of any kind shall be conducted upon the surface of such lands." The quote is from State Law. The fishing rights mentioned in the N.P.S. Statement are compatible with Wilderness and should not interfere.

So does Point Reyes qualify as wilderness, or does it not? The answer lies with the interpretation of the reader. Just one more point. The ten mile Point Reyes Beach is a magnificent creation. Accessible at only two points, North and South Beach, where man has made a very small dent with his parking lots and washrooms, the rest of Point Reyes Beach is tossed and free. If one cannot visit Point Reyes, if the press of business is such that offices and lunches take up all our time, couldn't we all benefit if, during the day between the reading and initialing of papers, we could look out the office window and know that somewhere out there, behind the skyscrapers and the government buildings, somewhere there is Point Reyes Beach. And it is free to the wind. Wouldn't we then be timeless for onesplit second? Couldn't we all benefit?

The writer of this proposal is not a scientist, a professional landsman, or even much of a do-gooder. He is an ordinary man with an ordinary job. I feel there have to be places with ready access, places you can drive up to, park in a paved lot without knocking the oilpan off the car, where there are paths wide enough to carry the lunches, the lawn chairs, the thermos bottles, the blankets, the crib, the diaper pail and the dog. Where, once at the destination, whether it be beach, waterfalls, overlook, or campsite, the fence will keep the kids from falling down the well and the washrooms are functionable. I know these places, and they are needed, and there are such places. But I know also that other places can exist. And not only for the benefit of the backpackers, the deep-knee benders and the 'malcontents'. We need places away from all of the fences and the instructions. Places where a man can go and see his family as a natural phenomenon, integrated with another natural phenomenon. A place where a man's children can ask 'where' rather than 'when'. We, the ordinary guys need such a place. Our children need it. A place to hike, to horseback, to hide in and to help.

Point Reyes National Seashore is such a place. I humbly ask your assistance in the Sierra Club's proposal to designate Point Reyes Seashore and the Drake Esteros as Wilderness Area. It is not such a big jump from the 10,000 acres that the National Parks Service wants to the 32,000 acres that the Sierra Club asks. Mathematically 22,000 acres. But it is much more than that. It could be the difference between the Beginning and the End.

Earlier I asked, where does man fit into Wilderness?

Perhaps with his "hat in his hand".

A-49

Thank you

Bill Bradd

Specific points in the National Park Service Dept. Environmental Impact Statement for Point Reyes wilderness proposal call for additional comment as follows:

I. The NPS Environmental Statement implies that wilderness designation cannot apply to the beaches because the State of California retained mineral and fishing rights when it ceded the tidelands to the Seashore. This is not a reason for eliminating wilderness consideration ---fishing is certainly compatible. As for mineral exploration, the state's deed specifies that there will be no surface mining or drilling. Further, the State Lands Division, Long Beach, California, informs us that there are no off shore or tideland mineral leases at Point Reyes National Seashore.

Is the NPS certain that the tidal lands from mean high tide to the Seashore boundary, 1/4 mile seaward from this line, must be excluded? We see no explanation in the draft EIS as to why, as state retention of mineral and fishing rights is not sufficient justification.

We ask that you discuss this point further.

II. The draft EIS, justifying its Wilderness Proposal, makes the point that "The portions of Inverness Ridge within the proposed wilderness appear as virgin forest and contain most of the remaining uncut forests on the ridge." This is a contradictory statement. Certainly, the Bishop Pine forests on Inverness Ridge appear to be virgin, as does the Douglas Fir. This is equally true for some parts of the Seashore not included in the NPS Wilderness proposal. Logging started on the peninsula over a century ago so it may be that there are no uncut forests on the ridge. The statement is also a justification for the conservationists wilderness proposal, except specific areas which we acknowledge as having been logged and ask for their inclusion when they have recovered.

III. The draft EIS claims that "most of the lakes are presently used for stock watering, with the subsequent trampling of all marsh vegetation around them". This statement is not factual nor is it relevant to either the NPS proposal or the Sierra Club proposal. Many of these lakes fall within the boundary of the Club's wilderness proposal but only a small number of those are in use for cattle and are thus being trampled. Other stock ponds have silted in or have become established as wildlife habitat with a natural appearing shoreline. Most of these qualify for wilderness designation according to the policies set forth by the June 24, 1972 memo from Assistant Secretary of the Interior Nathaniel Reed to the Directors of the National Park Service and the BSF&W.

IV. The draft EIS comments that resource management programs are soon to be implemented to reduce the size of the exotic deer herds. Have these plans been made available for examination or evaluated for their impact? (Our question is not meant to suggest opposition

to controlling the numbers of exotic deer). If the numbers of either the exotic deer or the native California black-tail are to be controlled, we urge the Park Service to manage this by a monitored, ecologically sound program, not by merely issuing depredation permits which will, in effect, allow private hunting parties to enjoy the privileges of taking the best of the herds.

- V. The Park Service is to be commended for their efforts to protect marine wildlife at Point Reyes by establishing two natural research areas, and by proposing wilderness for an eight mile stretch of coastline. The draft EIS mentions these areas and then goes on to describe the offshore rocks, the unique abalone nursery, the marine mammal shelters and the rugged surf of the Point Reyes Beach, implying that these, too, will be protected. Indeed, they should be protected and the draft EIS describes why, yet the National Park Service does not propose them for wilderness status. All of the areas mentioned should be designated wilderness for the very reasons which the NPS draft EIS so eloquently sets forth. The statements on page 11 are certainly justification for insuring that no motored pleasure craft will ever disturb the waterfowl or that no motorcycle or dune-buggy will ever violate the sanctuary of the isolated tip of Limantour Spit.

Specifically regarding Point Reyes Beach, the visitor facilities behind the dune line will not be an imposition on wilderness, as the EIS suggests, nor will the ranches (which have reserved possession only as close to the dunes as 100 yards above mean high tide). Wilderness designation here will simply aid the NPS by keeping careless cyclists and dune-buggy drivers away from the hazardous surf.

- VI. The draft Environmental Impact Statement implies that none of Drakes Estero can be classified as wilderness because of Johnson Oyster Farm. This is misleading. The company's buildings and the access road must be excluded but the estero need not be. The water area can be put under the Wilderness Act even while the oyster culture is continued --- it will be a prior existing, non-comforming use. The Reed memo previously cited seems to be speaking to such uses as this. The harvesting operation might be made more compatible if the Park Service were to require Johnson to use electric powered boats.

- VII. The Sierra Club does not agree that the existing camps must be excluded from wilderness. First of all, the Reed memo of June 24, 1972 to the Director specifies that wilderness campsites should be considered for inclusion. (Please see memo, page 2, "Visitor. Use Structures and Facilities"). At least the two more remote campgrounds should be studied with this in mind.

The impact on these camps is expected to be high, as it has been in the past. Indeed, this presents a challenge for skillfull management. We understand that Back Country Management Plans are now being prepared; this could be an opportunity for planning innovative resource protection at the camps.

With regard to the water supply: If the present supply should fail, why not require the camper to carry in his own water. Many other NPS areas do not supply water in camps (Guadalupe Mountains, for example) saving development funds and providing a truer wilderness experience for the backpacker.

The Point Reyes Wilderness draft EIS implies that the novice backpacker would be left to die if injured or wearied in the wilderness area. The Wilderness Act provides for emergencies and the Department of the Interior interprets this to mean that in special or emergency cases involving the health and safety of wilderness users, aircraft and motorized vehicles may be used. We suggest that funds be used for interpretation and education instead of road construction and maintenance and vehicles; this might alleviate the need for many rescues. And we point out that other areas service backpackers in remote spots without use of vehicles (Sequoia-Kings Canyon can handle up to 50,000 backcountry overnights per year on terrain much more hazardous than Point Reyes and where fire control is equally critical).

Clearly, the exclusion of camps is not justified.

VIII. We disagree that the possibility of emergency situations such as oil spills should preclude wilderness. Again, the Wilderness Act provides for emergency access to investigate, rescue or salvage plane crashes and other man-made environmental disasters. Contingency plans should be carefully developed to insure that emergency operations are begun quickly and carried out with as little damage as possible to the land. (The oil spill of 1972 resulted in not only oily beaches but bulldozer scars from roads hastily built and ill-advisedly constructed which have been causing erosion problems ever since.) Contingency plans should provide for the necessary emergency response while safeguarding the area's wilderness integrity and should obviate the apparent notion that environmental protection is not concurrent with wilderness protection.

IX. The first paragraph on page 21 of the draft EIS is confusing.

Because wilderness restrictions will reduce use of the proposed wilderness, similar life zones outside the wilderness will eventually be altered and, to some degree, deteriorated under the impact of more flexible use. Brush expansion will be restricted, trails will be maintained and patrolled with motor vehicles, and limited visitor facilities will be constructed. For this reason the rather homogenous continuum of landscape that presently exists will exhibit an increasingly distinct line of demarcation between wilderness and non-wilderness.

Is the Service stating here that a direct consequence of establishing a wilderness area will be controlled degradation of the adjacent area? Nonsense.

X. Wilderness designation will not automatically be accompanied by "lack of control" of an area, as the EIS implies on page 21. Nor will it encourage illegal camping, wood fires and acts of vandalism. Proper management might actually enhance visitor contact and result in better protection due to the familiarity the ranger on foot or horseback will have with the area.

XI. The Sierra Club would like an opportunity to review the Environmental Impact Statement for the proposed Bass Lake campground. The "relatively unused area" which will be opened by this camp is uncomfortably close to the cove at Double Point where sea lions have traditionally taken refuge. Previous pages of the wilderness proposal EIS have been devoted to the measures taken to insure isolation for those animals whose habitat is being taken over by human intrusion, yet here we find it stated that there are plans to introduce large numbers of people adjacent to a prime haulout area. We question the advisability of a camp here for that reason and because of the danger of polluting Bass Lake.

XII. Sanitary facilities (pit toilets) are permitted in wilderness areas if necessary for the health and safety of wilderness travelers or for the protection of the wilderness area. Pit toilets in other NPS areas are serviced by horse or helicopter; could not this be done at Point Reyes? Why, then, will it be necessary to continue the destructive unsightly and expensive grading of Bear Valley Trail to a width of 8-10 feet? And why should the last mile of the Bear Valley Trail not be included in wilderness?

The statement that no trails radiate from the Bear Valley Trail into the wilderness area is either incorrect or extremely confusing.

XIII. The EIS questions the feasibility of wilderness trail maintenance and quality. The cost of maintaining trails need not necessarily double, nor the quality diminish. We hope the Service will allow some of the groups which give many hours helping to maintain good quality hiking and riding trails on Mt. Tamalpais to participate in trail maintenance at the Seashore.

XIV. We do not feel that the EIS arguments against a wilderness larger than the proposed NPS wilderness justify ruling it out.

- A. Only the power line among the developments mentioned on page 33 is included in the Sierra Club proposal. And, again there seems to be some contradiction over the seismological equipment in use by the USGS. A statement from both agencies listing equipment in use and research planned, should be prepared for our information.
- B. Wilderness Reserve status could be designated for areas which are in the process of being restored to wilderness, such as logged areas or overgrazed areas.
- C. Upgrading of the "Muddy Hollow Road" for private vehicular traffic will be vigorously opposed. Perhaps its use for transit, as a corridor through wilderness, might afford the Park Service an excellent opportunity for visitor contact and education and afford the visitor what the EIS calls on page 21 "a wilderness experience



by mechanical or motorized means."

- D. Neither the RCA nor the AT&T lands were included in the Sierra Club wilderness proposal, nor any of the eight operating dairies; nor was the closing of a major road suggested. Removal of the building at Lower Pierce Ranch, power lines and fences would make Tomales Point suitable for wilderness designation. The protection of the Wilderness Act should be given to this magnificent part of the Seashore.
- E. Restoration of native grasses in the area of the Sierra Club wilderness proposal would no more be necessary than in the area proposed by the NPS which was also subjected to many years of grazing.
- F. The integrity of the wilderness experience is reduced no more on Tomales Point because of the sight of development across the Bay than it is on Mt. Whittensburg which has the same view and is close to the noise of the highways.

XV. We are glad to find that the draft Environmental Impact Statement points out that if there were no wilderness areas, "intensive use .... could eliminate one of the few great opportunities for wilderness experience in the Bay Area and would result in a disruption of the natural values...management philosophies could possibly change considerably as pressures of an expanding Bay Area population are applied to the undeveloped lands of the Seashore." It is for this very reason that the Sierra Club proposes a large wilderness area at Point Reyes. We recognize that Point Reyes is not a large area and that there is a great demand for consumptive recreational uses. But we remember the discerning statement by Doug Nadeau in the Draft Master Plan for Point Reyes that getting people out of their cars, onto the land on foot would greatly expand the capacity of the land and agree that the best and highest use of this peninsula would be for wilderness recreation. We agree with the authors of the EIS that wilderness designation for Point Reyes will complement the recreational resources of the Golden Gate Recreation Area; part of the "buffer zone" for wilderness at Point Reyes can be in the GGNRA, preparing the visitor for a meaningful encounter with the wild rugged coast and the dense woodlands of the spectacular Seashore.