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7 CALIFORNIA CATTLEMEN’S ASSOCIATION

8 UNITED STATES DISTRICT COURT
9 NORTHERN DISTRICT OF CALIFORNIA

10 CALIFORNIA CATTLEMEN’S
11 ASSOCIATION

Case No. 3:24-cv-08703-JSC

DECLARATION OF KEVIN LUNNY

12 Plaintiff,

13 v.

14 UNITED STATES DEPARTMENT OF THE
15 INTERIOR, DEB HAALAND, in her capacity as
Secretary of the United States Department of the
16 Interior, UNITED STATES NATIONAL PARK
SERVICE, and CHUCK SAMS, in his capacity as
17 Director of the National Park Service,

18 Defendants.

DECLARATION OF KEVIN LUNNY

I, Kevin Lunny, declare as follows:

1. I am a rancher in the Point Reyes National Seashore, operating the "Historic G Ranch" in the central part of the Pastoral Zone. I am also a member of plaintiff California Cattlemen's Association. I have personal knowledge of the facts stated here and could and would competently testify to them as follows.

2. The Historic G Ranch has been in continuous ranching operation since 1869.

3. There is currently a herd (known as the "Drakes Beach herd") free ranging in the southern portion of the Pastoral Zone.

4. I have seen fences destroyed by the Drakes Beach herd and elk bullying cattle away from feed and water there.

5. Park Service staff sometimes attempt to "haze" the elk to get them to return to the non-ranching areas, but the elk return almost as soon as Park Service staff leave.

6. I am aware of reports from other ranchers in the southern portion of the Pastoral Zone of free ranging elk goring their cattle, jeopardizing their organic certifications, and driving them to the brink of going out of business.

7. I am gravely concerned that the removal of the Tomales Point elk fence is likely to quickly result in elk escaping into more northern portions of the Pastoral Zone, including the Historic G Ranch, and cause harms there similar to the significant harms the free-ranging herd has already caused in the southern portions of the Pastoral Zone.

I declare under penalty of perjury under the laws of the United States that the statements in this declaration are true and correct.

Dated: December 6, 2024


Kevin Lunny