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8 Attorneys for Intervenor-Defendants  
9 JULIE EVANS ROSSOTTI, et al.

10 UNITED STATES DISTRICT COURT  
11 NORTHERN DISTRICT OF CALIFORNIA  
12 (OAKLAND DIVISION)

13 RESOURCE RENEWAL INSTITUTE,  
14 CENTER FOR BIOLOGICAL DIVERSITY,  
and WESTERN WATERSHEDS PROJECT

15 Plaintiffs,

16 v.

17 NATIONAL PARK SERVICE, a federal  
18 agency, and CICELY MULDOON, in her  
official capacity as Superintendent of Point  
19 Reyes National Seashore,

20 Defendants;

21 JULIE EVANS ROSSOTTI, DAN and  
DOLORES EVANS, DAVID EVANS,  
22 ROBERT McCLURE, TIM, TOM, and MIKE  
KEHOE, ERNIE, ERNEST, and NICHOLA  
23 SPALETTA, BETTY NUNES, and WILLIAM  
and NICOLETTE NIMAN,

24 Intervenor-Defendants.  
25

Case No.: 4:16-cv-00688-SBA

**DECLARATION OF BRIGITTE MORAN  
ON BEHALF OF AGRICULTURAL  
INSTITUTE OF MARIN COUNTY IN  
SUPPORT OF INTERVENOR  
DEFENDANTS' OPPOSITION TO  
MOTION FOR PRELIMINARY  
INJUNCTIVE RELIEF**

**ORAL ARGUMENT REQUESTED**

Action Filed: February 10, 2016

Date: November 9, 2016

Time: 1:00 p.m.

Dept.: 210, 2nd Floor,  
1301 Clay Street, Oakland

Judge: Hon. Sandra B. Armstrong

1 I, BRIGITTE MORAN, declare as follows:

2 1. I make this declaration on behalf of myself and the Board of Directors of the  
3 Agricultural Institute of Marin County (“AIM”), in support of the Intervenor-Defendants’  
4 Opposition to the Plaintiffs’ Motion Preliminary Injunctive Relief in the above-captioned lawsuit.

5 2. I am the Chief Executive Officer of AIM. AIM currently manages seven certified  
6 farmers’ markets in the Bay Area that supply products from more than 400 family farms, specialty  
7 food purveyors, and local artisans. AIM’s mission is to educate the public about the nutritional and  
8 economic benefits of buying locally grown food directly from farmers, and to connect and support  
9 communities and agriculture.

10 3. Farmers’ Markets are a valued part of Marin County and the greater Bay Area.  
11 There are 14 Farmers Markets in Marin County, 202 in the San Francisco Bay Area, 850 in  
12 California, and approx. 8,284 in the US according to the USDA. AIM estimates that more than  
13 30,000 people attend AIM’s seven Farmers Markets a week. The Local Food movement is strong  
14 and growing.

15 4. In 2014, 81.5 percent of Marin County voters affirmed their support for AIM and the  
16 maintenance and expansion of local farmers’ markets by voting to create and designate an expanded  
17 and permanent farmers’ market pavilion and market site at the Marin County Civic Center to  
18 support the local food movement.

19 5. The Ranchers at Point Reyes National Seashore are long-time, regular vendors  
20 and/or product suppliers whose supplies of local, sustainable, and organic dairy and beef products at  
21 AIM farmers’ markets are crucial to the markets and the local farm-to-table food supply chain.

22 6. AIM monitors the production practices of all of its vendors through our Farm Audit  
23 program. The Ranchers, like all other vendors or suppliers, meet stringent requirements and  
24 certifications that ensure that sustainable and environmentally sound agricultural practices are used  
25 on local and ranch lands and at dairy and beef production facilities.

26 7. AIM staff and board members conduct and participate in regular visits, tours, and  
27 events at the Seashore Ranches. We strongly disagree with Plaintiffs’ characterization of the  
28

1 Seashore ranches as “sprawling” “industrial” complexes that “sull[y]” the Seashore. Plaintiffs’  
2 Motion (ECF No. 86), at 10-11. Before the Court passes judgment on the Ranchers or any of the  
3 Plaintiffs’ allegations against them, we would urge the Court to visit the Ranches as well as any of  
4 our markets and see for itself whether Plaintiffs’ characterizations are accurate.

5 8. AIM and customers at AIM farmers’ markets value and depend on the Ranchers for  
6 many locally produced, sustainable, and organic products. Among the vendors and products that  
7 the Ranchers directly contribute to are Straus Dairy, Clover Dairy, Marin Sun Farms, and Pt Reyes  
8 Farmstead. The Rancher’s products are found in all of our food artisans prepared products at the  
9 Farmers Market, as well as in many of the Bay Area restaurants, school cafeterias and institutions.

10 9. AIM’s mission is to connect local, sustainable farmers directly to consumers. The  
11 Ranchers play a vital and important role in that goal, as well as the creation and maintenance of the  
12 local farm-to-table food culture that has become such an important part of Marin County and the  
13 larger Bay Area. AIM believes that the Ranchers are stewards and innovators of modern  
14 sustainable local agriculture and food production. Penalizing or harming them because of planning  
15 disputes between Plaintiffs and the National Park Service is unfair to the Ranchers and harms the  
16 interests of AIM and the thousands of families who come every week to purchase local, sustainable  
17 and organic dairy and beef products for their families. Impeding or harming the Ranchers’ ability to  
18 continue to maintain and manage their historic family ranches during this lawsuit or planning  
19 process would negatively impact the valuable supply of farm-to-table beef and dairy products that  
20 consumers have come to depend on in the Bay Area.

21  
22  
23 I declare under penalty of perjury under the laws of the United States of America that the  
24 foregoing is true and correct. Executed this date of August 31, 2016.

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27 \_\_\_\_\_  
28 BRIGITTE MORAN