

CALIFORNIA COASTAL COMMISSION

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Th6b

CD 0006-20 (National Park Service)

December 18, 2021

CORRESPONDENCE

(received as of December 18, 2021)

PART 1

PAGES 1 - 155

This item is a form letter sent to the PointReyesManagementPlan@coastal.ca.gov inbox from 9,514 separate contacts:

Further Inquiry Needed Before Signing Away Point Reyes National Seashore

Dear Executive Director John Ainsworth,

On behalf of In Defense of Animals, an animal protection organization with over 250,000 supporters, I oppose the National Park Service's final General Management Plan Amendment (GMPA) for the Point Reyes National Seashore.

Before moving forward with Alternative B, which will ruin the Seashore with continued and expanded cattle grazing and the growth of other private, for-profit businesses at taxpayer expense, I urge you to pursue further inquiry, including long overdue water quality tests and a Supplemental Environmental Impact Statement (SEIS) on drought and wildfires.

Tourism is the primary source of income at the Seashore. Cattle are the Seashore's primary source of greenhouse gases which contribute to climate change. Private ranching at the Seashore has resulted in overgrazing, water pollution, invasive weeds, and the reduction of native species, including those protected under the Endangered Species Act.

Water quality degradation occurs from ranching practices like spreading liquid manure on fields, which increase human health risks, kill native fish, and pollute waterways. I implore you to conduct a Federal Consistency Review to address the lack of water quality testing, known environmental degradation, and impacts on migratory birds and endangered species at the Seashore.

A SEIS on the GMPA concerning the Woodward Fire would determine new impacts on free-roaming elk. The impacts of ranchers growing crops and raising sheep, goats, pigs, turkeys or chickens, which increase conflicts with wild animals, must also be assessed.

I also urge you to investigate the mass die-off of Tule elk who are fenced into a "preserve" — which is in violation of the Organic Act 1916 — without any perennial stream to serve fresh water. Please act urgently to ensure the NPS upholds its duty before any more of these rare native animals die.

Alternative B must not be finalized until all these steps above are taken, and the public's concern for the future of this natural treasure and the wild animals who call it home is acknowledged.

Thank you for your consideration of this pressing matter, I look forward to your response.

This item is a form letter sent to the PointReyesManagementPlan@coastal.ca.gov inbox from 7,956 separate contacts:

Manage Point Reyes for Wildlife — Choose Alternative F

Dear John Weber,

I strongly object to the National Park Service's adoption of Alternative B for the General Management Plan amendment for Point Reyes National Seashore. I oppose the killing of native wildlife and the designation of commercial agriculture as the park's main use. Alternative B elevates private profits and entitlements while conflicting with the Park Service's mandate to preserve the natural environment for public benefit. I'm asking you to do everything in your power to stop this plan.

The native tule elk are an iconic part of the natural landscape at Point Reyes and are the only tule elk herds within the national park system. There's no ecological justification or valid management reason for harassing, fencing or shooting elk in the park. Commercial lease holders on our public lands shouldn't be dictating policies that persecute the park's wildlife.

Alternative B doesn't manage commercial ranching leases to accommodate elk or other native wildlife, nor does it adequately manage cattle grazing to protect coastal ecosystems, wildlife habitat, water quality, soil and native vegetation. Instead it sets a horrible precedent by expanding private agricultural uses on our parklands, allowing row crops and introducing sheep, goats, pigs and chickens, which will inevitably create more conflicts with other wildlife in the park.

I urge the Park Service to reject Alternative B and instead approve Alternative F, which would phase out cattle ranching, expand recreation opportunities, and allow the elk to roam free throughout the national park. Alternative F is the only option that prioritizes the outstanding natural values of Point Reyes National Seashore for the public benefit.

This item is a form letter sent to the PointReyesManagementPlan@coastal.ca.gov inbox from 177 separate contacts:

Please stop NPS from killing tule elk

Executive Director John Ainsworth,

I am writing to express my disapproval of plans to kill the native, free-roaming tule elk of Point Reyes National Seashore as outlined in Plan B of the environmental impact statement for the General Management Plan Amendment.

Up until a few decades ago, tule elk were thought to be extinct as a result of unfettered commercial hunting and displacement by cattle. Many California residents and groups—including the National Park Service and U.S. Fish & Wildlife Service—spent decades working to re-establish a free-ranging herd on the National Seashore.

Tule elk symbolize the conservation of native species and ecosystem processes, one of the primary missions of the National Park Service. The National Park Service should support actions to improve the ecological health and integrity of the landscape—which includes free-roaming tule elk herds—without killing elk.

Can you help stop this strategy by urging further inquiry, such as water quality tests and a supplemental environmental impact report on drought and wildfires, before the National Park Service signs this disastrous plan?

Thank you for your time.

From: DAWN-DYANNA Dhyanna <dhyannai@comcast.net>
Sent: Friday, December 18, 2020 10:10 AM
To: Coastal Point Reyes Management Plan <PointReyesManagementPlan@coastal.ca.gov>
Cc: Weber, John@Coastal <john.weber@coastal.ca.gov>; Carey_feierabend@nps.gov;
Craig_kenkel@nps.gov
Subject: Save the Tule Elk on Point Reyes National Seashore

Gentlemen,

Please - enough is enough with the cattle ranching. (That was supposed to end, per agreement, 30 years ago.)

We ask that you please **protect the Tule Elk herd**. Absolutely DO NOT allow any of them to be killed. They are already struggling.

Excessive cattle ranching is compromising the integrity of the fragile ecosystem at Point Reyes. It needs to be stopped now! And rolled back.

We are counting on you to do the right thing. We, and future generations, will be so grateful for your responsible and compassionate stewardship.

Please, hear us now.

Thank you,
Dawn-Dyanna Dhyanna
Petaluma CA
707-292-0970

From: Sidney Dent <mouselib@prodigy.net>

Sent: Friday, December 18, 2020 10:06 AM

To: Coastal Point Reyes Management Plan <PointReyesManagementPlan@coastal.ca.gov>

Cc: Weber, John@Coastal <john.weber@coastal.ca.gov>; careyfeierabend@nps.gov;
craigkenkel@nps.gov

Subject: Protecting Point Reyes from becoming a Harris Ranch. ChoseTule Elk over cattle.

Dear Sirs,

The Tule Elk in Point Reyes are being unfairly targeted
for killing because that is what the ranchers want.

The Point Reyes National Seashore was set up to protect this beautiful area
from development. The Tule elk were re-introduced and have thrived.

They are not a threat.

The Park District argues for killing more of them even though the park allowed
over 200 to die from lack of water sources in 2015.

The staff of the park have done nothing to investigate birth control measures
for the 3 herds. Killing is easier.

There are 600 elk and 6000 polluting cattle.

Cattle are the problem.

The Park District introduced a number of management plans to the public

The most damaging to the area is the plan giving ranchers longer leases and allowing
more animal agriculture. This is the plan being sold to the public.

Unfortunately elected officials in Marin, those who claim to be environmentalists
pander to the demands of the ranchers. They already agreed to on-ranch slaughtering.
You on the coastal commission are in a position to prevent more commercialization and
protect

one of the few areas of natural coastline.

Left unopposed the Park district will create a Harris ranch on this public land.

Thank you,

Sidney Dent

66 Main Street, San Quentin, Ca 94964

phone 415 460 1234

From: Joan Sander <jysander777@gmail.com>

Sent: Friday, December 18, 2020 9:52 AM

To: Coastal Point Reyes Management Plan <PointReyesManagementPlan@coastal.ca.gov>

Subject: Citizen Comments regarding Point Reyes from Dr. Joan Sander

COMMENTS TO COASTAL COMMISSION RE: POINT REYES on 12 18 2020

My name is Dr. Joan Sander- my training was in Dentistry and Public Health at UCLA. I am also a long-time California hiker and nature lover. Although I live in Arcadia, CA, my favorite spots are Point Lobos and Point Reyes. THANK YOU for the opportunity to give feedback to the Coastal Commission on the issue of Point Reyes. The Coastal Management Act clearly states the following:

Article 3 — recreation, placing a priority on coastal dependent... recreation over development

Article 4 — protection of the marine environment, including water quality issues, wetlands protections

Article 5 — protections for environmentally sensitive habitat

My comments to you focus on these three articles that require the commissioner to place a priority on 1) recreation over development and 2) protection for this very special environmentally sensitive habitat area and 3) protection of marine habitat over dairy development which is now unnecessary and irrelevant to present needs.

After a summer of fire in 2020 due to global warming, we are now more sensitive to all the changes that will happen in our California future- you are all aware that most of the global warming has happened in our marine environment. Besides the heating of the oceans that you have no direct control over, the dairy waste washing down into this special area from the dairy industry adds another heavy burden to the special area of Point Reyes. Marine protection of such a special coastal area as Point Reyes- requires the Coastal Commission **UNDER Article 4**-to be vigilant about the additional pollution from the dairy industry that washes into the ocean and adds to the environmental burden for marine life.

In addition, a quick visit to any grocery store will tell us that American consumers have turned away from dairy milk to plant-based milks-soy, oat, almond and other nut milks now take up the shelf space that dairy milk used to dominate. As I understand, the historical park agreement with the dairy industry in 1962 under President Kennedy, explicitly provided for the retention of the ranches in a designated pastoral zone, with ranchers signing 25-30 year reservations of use and occupancy leases. The dairy industry must NOT be protected over marine habitat any longer! Development must not be prioritized over recreation **UNDER Article 3**.

Although the Park Service has been negligent about its required duties to wildlife in the area, the Coastal Commission can **UNDER Article 5**- still do their part to address protections for environmentally sensitive habitat, home to special species. This habitat also is home to a very special species of tule elk. Our **California tule elk population** was once thought to be extinct. Common sense should tell us that this elk population must be protected-not treated as an annoyance and competitive species for domestic dairy cows. Most visitors are thrilled to view the tule elk, brought back from extinction! The previous and out-going Trump administration always placed business interest over environmental needs. Please be reminded that extinction is forever and few areas can now support elk as in the past.

The Coastal Commission has to weigh many opposing interests as they seek to perform their duties. Please remember ALL the citizens in California who are seeking a seat at the table, not just the dairy industry and the local population. There is only one Point Reyes and its treasures belong to all citizens in the state of California!

From: Becky Seid <becky.seid@outlook.com>
Sent: Friday, December 18, 2020 8:53 AM
To: Coastal Point Reyes Management Plan <PointReyesManagementPlan@coastal.ca.gov>
Cc: Weber, John@Coastal <john.weber@coastal.ca.gov>; carey_feierabend@nps.gov;
Craig.Kenkel@nps.gov
Subject: Point Reyes Management Plan

Dear Commission members,

I am writing as a Marin County citizen who finds great enjoyment and pride in our National Seashore.

However, I am shocked and saddened at the NPS's proposed plan to extend ranching and shoot native tule elk. Our national parks should be used to protect native species, not contribute to their destruction. Point Reyes is a hotspot for biodiversity, and that is being destroyed due to these ranching operations. Threatened and endangered species, such as the coho salmon, are just one example. There are streams in the park that should be able to be used by salmon that are shown trampled by cattle.

Additionally, with over 5,000 cattle in the park, many grazing right along the coastline, I'm horrified of the amount of manure that is seeping into the streams, lagoons, and ocean. How does the NPS think this is okay? Protecting our natural resources and native species should be their top priority, not catering to the ranchers who were given 25 years to phase out their operations but are somehow still there and have grown into large commercial operations.

30% of Point Reyes is used for commercial ranching. Many of these ranches are right along the coast, prohibiting access to the coastline while the manure from these thousands of cows seeps into our waterways. Ranching has destroyed the native plants, which the NPS acknowledges on their website. Considering that only 2% of coastal prairie is left, shouldn't the focus be on restoration and preservation?

The final proposed plan calls for adding miles and miles of elk fence, which will further hinder access to the coastline, as well as allowing the killing of tule elk who wander onto rangeland. It is completely irresponsible to shoot a native species in a national park to help out commercial livestock operations. This is absolutely devastating and tarnishes the beauty of Point Reyes National Seashore.

Please do not agree with this proposed plan. It goes against what national parks were established to do, which according to them, is to "preserve unimpaired the natural and cultural resources and values of the National Park System for the enjoyment, education, and inspiration of this and future generations."

Thank you for considering my heartfelt opinion, and thank you for the work you do. I write out of love for Point Reyes National Seashore and our magnificent California coast.

Sincerely,

Rebecca Seid
Novato, California

From: Scott Wolland <scottwolland1@gmail.com>

Sent: Friday, December 18, 2020 8:20 AM

To: Coastal Point Reyes Management Plan <PointReyesManagementPlan@coastal.ca.gov>

Cc: Weber, John@Coastal <john.weber@coastal.ca.gov>; Carey_feierabend@nps.gov;
Craig_Kenkel@nps.gov

Subject: Agenda Item CD-0006-20 (NPS, Point Reyes GMPA); Consistency Determination for the Point Reyes National Seashore General Management Plan Amendment

December 17, 2020

Re: Agenda Item CD-0006-20 (NPS, Point Reyes GMPA); Consistency Determination for the Point Reyes National Seashore General Management Plan Amendment (GMPA) and Environmental Impact Statement

Dear Coastal Commissioners:

I am writing about the Point Reyes National Seashore's Consistency Determination. I encourage the commission to reject it.

I lived in the Tomales Bay Watershed for 15 years and continue to spend time in Inverness and the Park regularly. Besides hiking the trails, and pastoral zone, I also spend time open water swimming in Tomales Bay and the ocean around Point Reyes National Seashore (PRNS). The new plan would prevent me from further accessing the coastal lands due to increased fencing. There are already hundreds of miles of barbed wire fences. The public needs more access to the beaches and coastal areas, not less. The land and water, plants and animals should receive more protections, not less.

Even though the Park is under federal jurisdiction, the coastal waters under the CCC are impacted by activities in the Park.

The PRNS General Plan amendment is inconsistent with the California Coastal Act because the Act declares that access to the park should be provided for "all the people" (Section 30210). The General Management Plan provides access and opportunity to the ranching families that the public does not receive. For example, the ranches have established endless miles of barbed wire and electrical fencing in and around points of interest and even popular hiking areas. Therefore, the ranches have access to land (28,100 acres), access to exploit natural resources on the land and access to profits acquired from the resources that the public does not.

The Point Reyes National Seashore General Plan amendment is inconsistent with the California Coastal Act because the Act declares that it should protect private property owners (Section 30210). However, there are no private property owners at Point Reyes Seashore. There is no private property; it is all public land. **As the ranchers are not private property owners, there should be no duty by the General Management Plan to protect their interests.**

The PRNS General Plan amendment is inconsistent with the California Coastal Act because the Act declares that access to the park should "not interfere with the public's right to access the sea" (Section 30211). The land owned by private individuals on the seashore stands beside the ocean and the beach, obstructing public access. When I visit the park, **I am unable to access the ocean from all directions**, as I am blocked by ranches/farms. The private operations block me from swimming/engaging with the ocean. Allowing extra development/diversification

of ranching land further discourages members of the public from accessing the ocean through the ranching land.

The CC Act states that special protection shall be given to areas and species of special biological significance (Section 30230). Claims that ranching is the best method of protecting native species and regulating invasive species are false. The amendment gives no evidence for how ranching is supposed to protect native plant species nor prevent invasive species. Rather, as conceded by the amendment, the cattle trample native plants, disrupting the larger marine ecosystem and violating this section. Critical Habitat streams for federally endangered Central Coast Coho salmon and steelhead populations within the Seashore and Golden Gate National Recreation Area continue to be **overloaded with sediments, stream bank destabilization with ineffective mitigation measures, and poor water quality for these rare anadromous fish.** The data also shows that the NPS is not ensuring water quality is maintained. The cows are helping cause the waters to be polluted. There has not been adequate monitoring of the waters/creeks in the park that feed into Tomales Bay waters and the impact the cows are having.

Lagoons, such as those found at Abbotts Lagoon, Kehoe Beach, and occasionally at Drakes Beach, and similar bodies of water can be hazardous areas for swimming whether they are in parklands or other urban or rural areas. Rainfall runoff and stream flow from surrounding agricultural areas flows into the lagoons potentially carrying harmful bacteria with it. **Point Reyes beaches have ranked among the poorest in water quality in the nation,** and I do not see the NPS Plan mitigating the continued problem of excessive cattle waste and manure disposal. So-called “carbon farming” asks me to believe that dumping truckloads of cow manure onto pastures and former native grasslands will lead to carbon sequestration, when what is actually happening is manure not absorbing into the ground but running off with heavy winter rains into adjacent creeks, and into the ocean.

I ask that the California Coastal Commission object/reject this consistency determination, and instead support better access and protection for these extremely rare and special Pacific Coast public parklands and waters.

Sincerely,

Scott Wolland

Oakland, CA

scottwolland1@gmail.com

From: Young Scott <youngscott@sonic.net>
Sent: Friday, December 18, 2020 8:17 AM
To: Coastal Point Reyes Management Plan <PointReyesManagementPlan@coastal.ca.gov>
Subject: Blocking access to California Coast @ PRNS to profit polluting Cattle Ranching

If anyone is concerned,

Hundreds of miles of strands of ugly & intimidating cattle ranch barbed-wire are blocking your/our coastal access on publicly owned Point Reyes National Seashore. There is very little reasonable access to the beautiful California beaches at PRNS even though PRNS is public land paid-in-full with millions of taxpayer \$\$\$\$\$\$. I'm really feeling very cheated & deceived with what is going on at PRNS.

Article 2 — "development shall not interfere with the public's right to access the sea and coastal beaches". Your/my access is blocked by hundreds of miles of barbed-wire fencing strands & tons of muddy stinking, polluting manure.

Article 3 — "recreation, placing a priority on coastal dependent... recreation over development." Cattle Ranching destroys peaceful recreation, natural nature & beach cleanliness.

Article 4 — "protection of the marine environment, including water quality issues, wetlands protections". Pee-creeks & poo-ponds flow down hill, we all know where they go & flow.

Article 5 — "protections for environmentally sensitive habitat". Cattle ranching tramples sensitive habitat, destroys so much visitors come to see.

Article 6 — "protection of coastal views". Cattle ranching eliminates &/or destroys coastal views at PRNS.

Scott Young

308 Sherri Ct.

Petaluma, Ca

From: Noga Watt <wattnoga@gmail.com>

Sent: Friday, December 18, 2020 3:20 AM

To: Coastal Point Reyes Management Plan <PointReyesManagementPlan@coastal.ca.gov>

Cc: Weber, John@Coastal <john.weber@coastal.ca.gov>; Carey_feierabend@nps.gov;
Craig_Kenkel@nps.gov

Subject: ****URGENT****SAVE THE RARE TULE ELK FROM EXTINCTION AT POINT REYES NATIONAL SEASHORE PARK

Dear John & Point Reyes Management

I trust that you are keeping well.

I am writing to you from South Africa as a concerned citizen of this world.

The plight of the Tule Elk has reached all over the world and needs to be addressed in the best possible manner in order to save these majestic wild animals from extinction. This is one of the worlds wonders that I personally would like to be able to see one of these days, and these animals needs to be preserved at all cost for future generation to come in their natural environment.

As Americans citizens you should also treasure this place and see it as a national pride and have this area preserved.

The below points came to my attention and are worrisome to me:

1. The coastal access at Point Reyes National Seashore is being blocked by hundreds of miles of cattle fencing, barbed-wire, and herds of cattle. There is so little access to the beaches, even though this is public land.
2. The water pollution at PRNS is severe, and the smell of cow manure would definitely put visitors off. Cows Manure is getting into the creeks, and I know that sometimes the park service closes beaches because of manure pollution.
3. The historic character of the farming at PRNS is marred by new industrial dairy barns, which are modern, not historic, and block vistas of the natural coast.
4. I would like to be able to see wildlife such as native tule elk, elephant seals, whales, salmon runs, and lush coastal prairies with wildflowers when I/ visitors come there. I would not want to see cattle, manure piles, ugly barns, bare ground, and erosion. All this erosion and manure pollution is likely harming coastal marine life. This is not sustainable or furthering the mission of the Coastal Commission.

Please consider these points highlighted and work to reach optimal care for this natural treasure for years to come.

Best Wishes

Noga Watt

Cell: 071 215 3858

From: Mark Luiso <maluiso@pacbell.net>

Sent: Thursday, December 17, 2020 11:10 PM

To: Coastal Point Reyes Management Plan <PointReyesManagementPlan@coastal.ca.gov>

Cc: Craig_Kenkel@nps.gov; Gavin Newsom <gavin@gavinnewsom.com>; Carey_feierabend@nps.gov; Weber, John@Coastal <john.weber@coastal.ca.gov>

Subject: Save Point Reyes/Tule Elk

Years ago, we payed millions of tax dollars to the cattle ranchers and dairy farmers to vacate Point Reyes, to this day they are still here. They are destroying the landscape and polluting the countryside and ocean. Coastal access is blocked, as is much of the park itself. You're pushing the Tule Elk to extinction by taking away their habitat. All you see is industrialized ugliness. Piles of manure and cows living in mud and filth. Not to mention the smell. You are in violation of many of the Coastal Management Act's articles, such as 2,3,4,5 and 6. It is time they left and you do your job and quit subsidizing a dying industry.

Mark Luiso

95118

From: Susan Bradford <sbradford@sonic.net>

Sent: Thursday, December 17, 2020 10:02 PM

To: Coastal Point Reyes Management Plan <PointReyesManagementPlan@coastal.ca.gov>; Weber, John@Coastal <john.weber@coastal.ca.gov>; Carey_feierabend@nps.gov; Craig_Kenkel@nps.gov

Subject: For the California Coastal Commission

To whom it MUST concern,

It is the duty of the National Park Service to follow their mission.(period) It is as well, imperative that they recognize and follow the Public's Will when overwhelmingly they have said to remove the ranchers and protect the Tule Elk and other wildlife and environment.

My question: Why would the Pt Reyes National Park Service disavow their scared mission to protect the wildlife and the environment?

Anyone with eyes to see can see that there is something not right happening here, something very fishy, some kind of deal is being made between the National Park Service and some local ranchers and a few politicians. Someone is pulling some Big Money strings that are resulting in the destruction of the Pt Reyes National Seashore for a handful of commercial beef and dairy ranchers.

I am outraged that the NPS is suggesting to cull/murder the Tule Elk. They must be protected and the ranchers and cattle removed.

Ranching and increased farming will serve to damage the wildlife and indigenous native plants even more than it already has. The water pollution is severe, and the stench of the cow manure is overwhelming. I see it getting into the creeks, and sometimes the park service even has to close beaches because of manure pollution ie: Ecoli

All this erosion and manure pollution is harming coastal marine life. This is not sustainable or furthering the mission of the Coastal Commission. I come to see wildlife, native tule elk, elephant seals, whales, salmon runs, and lush coastal prairies with wildflowers. What I see are too many cattle, manure piles, ugly barns, bare ground, and erosion. And now even more business, buildings and dairy and cattle related agriculture etc is being proposed!

Article 4 — protection of the marine environment, including water quality issues, wetlands protections

Article 5 — protections for environmentally sensitive habitat

I say an emphatic NO to your current proposed plan! The current proposed plans must be stopped now!!

Thank you, Susan Bradford

San Rafael Ca 94901

From: Nancy <nsderuchie@prodigy.net>
Sent: Thursday, December 17, 2020 9:59 PM
To: Coastal Point Reyes Management Plan <PointReyesManagementPlan@coastal.ca.gov>
Cc: Weber, John@Coastal <john.weber@coastal.ca.gov>
Subject: Stop culling the elk

Please consider people who enjoy the outdoors and wish to have the elk left alone. Cattle everywhere - they do not belong. Stop the cull of elk.

Regards

Nancy DeRuchie

1. My coastal access is being blocked by hundreds of miles of cattle fencing, barbed-wire, and herds of cattle. There is so little access to the beaches, even though this is public land.
2. The water pollution is severe, and sometimes all the cow manure stinks. I see it getting into the creeks, and sometimes the park service closes beaches because of manure pollution.
3. The historic character of the farming at the seashore is marred by new industrial dairy barns, which are modern, not historic, and block vistas of the natural coast.
4. I came to see wildlife, native tule elk, elephant seals, whales, salmon runs, and lush coastal prairies with wildflowers. What I see are too many cattle, manure piles, ugly barns, bare ground, and erosion. All this erosion and manure pollution is likely harming coastal marine life. This is not sustainable or furthering the mission of the Coastal Commission.

From: Maggie Hohle <maggietext@gmail.com>

Sent: Thursday, December 17, 2020 9:43 PM

To: Coastal Point Reyes Management Plan <PointReyesManagementPlan@coastal.ca.gov>

Cc: Carey_feierabend@nps.gov; Craig_Kenkel@nps.gov; Weber, John@Coastal
<john.weber@coastal.ca.gov>

Subject: Tule Elk in Pt. Reyes National Seashore

Dear Coastal Commission, The Coastal Management Act clearly states that your mandate is to uphold the following:

Article 5: protections for environmentally sensitive habitat. Ranching pollutes the creeks and the beaches, and destroys native plants.

Article 2: development shall not interfere with the public's right to access the sea and coastal beaches. There are hundreds of miles of cattle fencing that interfere with my access to the coast, essentially privatizing the public coastline, while polluting it. How can you possibly protect these private industrial farming operations to the detriment of the public? Not in good conscience, surely.

Article 3 — recreation, placing a priority on coastal dependent... recreation over development. I cannot recreate and enjoy wildlife viewing when my views are blocked by cattle, eroded ground, piles of manure tarped and held down by tires, and the destruction of a lush natural habitat for native Tule elk, elephant seals, salmon runs and wildflowers and coastal prairies. This is like putting a garbage dump in Yosemite.

Cattle are animals, but they are not endemic to California like Tule elk are. They can live anywhere and so can their owners, who have been paid for their land. Please follow the law and evict the ranchers, returning the coast to the native species so we can all enjoy it again.

Thank you in advance for making the right choice.

Sincerely,

Maggie Hohle

Petaluma

From: Jenna Brager <jennajbrager@gmail.com>

Sent: Thursday, December 17, 2020 9:37 PM

To: Coastal Point Reyes Management Plan <PointReyesManagementPlan@coastal.ca.gov>

Cc: Weber, John@Coastal <john.weber@coastal.ca.gov>; Carey_feierabend@nps.gov;

Craig_Kenkel@nps.gov

Subject: Essential role of Tule Elk in Point Reyes

Dear Esteemed California Coastal Commissioners,

I'm writing to ask for your help to protect the Tule Elk in Point Reyes National Seashore. I have gone on several hikes where seeing the Tule Elk was not only the highlight of my day, but a highlight in my life. I have stopped in appreciation of these stunning Elk herds with impressive males with many points on their antlers. I've seen a large herd of females with their young mewing and squealing and talking to one another, moving toward the ocean as the sun sets. I've stopped in awe on the trail with many other park visitors appreciating a sacred moment such as this - a window into nature and a keystone animal who has sculpted the healthy landscape that is quintessential Point Reyes. The reintroduction of the Tule Elk was a groundbreaking and admirable project with good intentions. It has been a success. These Elk must be protected, because it is their inherent right, and because their genetic diversity is already at risk.

National Parks are for wildlife, beautiful views, healthy ecosystems, and for people to enjoy all these things. As a farmer, I have a deep appreciation for agriculture and ranching. I don't want to see it in my parks. National Parks are not the appropriate place for cows. Cows are rarely, if ever, managed in a way that they integrate with the wild ecosystem and promote biodiversity. We are losing biodiversity all over the world. California, Point Reyes in particular, is a biodiversity hotspot. In these times of immense environmental degradation, Point Reyes National Park should be an oasis, a place where endangered and rare keystone species are protected. They are critical to this ecosystem's well being.

I have seen the cattle ranches in Point Reyes. They are managed in a way that leaves mud and muck and manure as the vista. Beaches are sometimes closed because of the hazards of manure runoff. Plant diversity is trampled or completely disappeared. The ranches do not appear charming or historic. They appear industrial and ugly. It's clear that the ground and water are polluted with manure and excessive nitrogen. Livestock fencing blocks public access, my access to the coastline, as well as preventing wildlife passage.

My understanding of your very important role as Commissioners is that you are responsible for making decisions about the coast and land use, particularly on public lands and in parks, which uphold beach access, favor recreation like hiking and views over development, and protect sensitive habitats and species. Please do the right thing and make the decision to move the cows out of Point Reyes National Park, protect the Elk, and let the Elk do their essential job of maintaining a healthy diverse ecosystem that park visitors go to Point Reyes for.

Lives and a healthy planet are at stake. Thank you for your careful consideration of the essential place Elk have in the Point Reyes ecosystem.

Jenna Brager
Sebastopol, Sonoma County, CA
707-326-3313

From: cmilleresq@aol.com <cmilleresq@aol.com>
Sent: Thursday, December 17, 2020 9:26 PM
To: Coastal Point Reyes Management Plan <PointReyesManagementPlan@coastal.ca.gov>
Subject: Point Reyes Management Plan

Gentlepersons:

I am writing you in regards to the California Department of Fish and Wildlife's (CDFW) plan for the Point Reyes National Seashore involving the dairy farms and cattle ranches. I understand they are pushing for Alternative B. I would like to put forth that Alternative F, with no more ranching/farming, would be the more appropriate plan.

Due to the hundreds of miles of cattle fencing, barbed wire, and cattle herds, my coastal access to the beach is being blocked. Even though this is public land, there is little access to the beaches.

The National Park Service's preferred alternative of maintaining and diversifying commercial agriculture does not maximize the public's access to the coast.

Water pollution is severe due to all the cow manure. It is getting into the creeks, and the National Park Service has had to close the beaches sometimes due to fecal coliform manure pollution.

Taxpayers have already paid the ranchers/farmers hundreds of millions of dollars for their land years ago. My understanding they were to be off the property by 1987. The new modern industrial dairy barns mar any historical character of the farming at the Seashore. These modern barns block vistas of the natural coast.

People come to the Seashore to see wildlife, the native tule elk, whales, elephant seals, salmon runs, and lush coastal prairies with beautiful wild flowers. What they see are too many cattle, manure piles, ugly barns, bare ground, and erosion. Marine life is potentially being harmed by all this erosion and manure pollution.

In conclusion, I respectfully request the California Coastal Commission determine that Alternative B is unacceptable and conclude Alternative F is the best plan for Point Reyes National Seashore.

Christine Miller
Jurupa Valley, California

From: Perry Gray <perrygray@hotmail.com>
Sent: Thursday, December 17, 2020 7:58 PM
To: Coastal Point Reyes Management Plan <PointReyesManagementPlan@coastal.ca.gov>; Weber, John@Coastal <john.weber@coastal.ca.gov>; Carey_feierabend@nps.gov; Craig_Kenkel@npf.gov
Cc: Perry Gray <pgray@trusd.org>
Subject: Point Reyes Management Plan

Dear California Coastal Commission and all concerned,

I am writing to you to express my concern over the future of Point Reyes National Seashore, the Point Reyes Management Plan, and public access to the coastline.

Cattle fencing and commercial dairy operations are blocking access to publicly owned land and beaches. Publicly owned land is being held by private companies who are developing it for agricultural purposes and excluding the citizens who own it from access. This is a direct contradiction to article 2 of the Coastal Management Acts which states that development shall not interfere with the public's right to access the sea and coastal beaches.

The water pollution and erosion caused by cattle manure and dairy operations are severe. I can see manure and sediment entering creeks that lead to wetlands and the ocean. This pollution sometimes forces the closure of beaches by the National Parks Service. Pollution is very likely harming marine life. This is contrary to article 4 of the Management Acts which prioritizes the protection of the marine environment, water quality, and wetlands protection.

Modern industrial operations barns and modular housing for workers block vistas of the natural coast and do not fit with the historic character of farming within the park. These are not the scenic coastal views that Article 6 was written to protect. These types of construction are not historic, but modern. They bear no relevance to the history of agriculture in the area and are an eyesore upon our public land.

Article 3 of the Management Acts purports to prioritize recreation over development. Any visitor can see that fenced in agricultural operations and the development around them are the clear priority in many areas of Point Reyes National Seashore. Many parts of the park and its beaches are out of reach to the public and are firmly held in the hands of private individuals and the companies they work for. No public recreation can take place in these exclusive areas of the park.

Point Reyes is an amazing location where people from near and far can see unique ocean views and rare species like tule elk and elephant seals. These species were once thought to be extinct. Give these species a real chance to survive into the future. Now they have a tiny slice of habitat upon which to rebuild small populations. That habitat is threatened and limited by cattle and dairy operations within the park. There is no similar shortage of cattle habitat in our region. The coastal prairie ecosystem has largely disappeared from our state. This small piece of public land may be one of the few places where it can be effectively protected for the enjoyment of future generations. It can easily be described as the environmentally sensitive habitat that Article 5 aims to protect.

I thank you for taking the time to read this. I ask you to reject the current Point Reyes Management Plan. It is not sustainable. It does not further the mission of the California Coastal Commission. It is not in the best interests of the people of California.

Sincerely,
Perry J. Gray
8965 Valley Ford Rd.
Petaluma, Ca. 94952
perrygray@hotmail.com

From: robert tysor <rtysor2@att.net>
Sent: Thursday, December 17, 2020 7:58 PM
To: Coastal Point Reyes Management Plan <PointReyesManagementPlan@coastal.ca.gov>
Subject: Tule elk population

Members of the California Coastal Committee,

I moved to the Bay Area after military service to enjoy a forward thinking place of refuge amongst a difficult transition process.

This is not the best solution to handle a population of elk simply trying to survive in an environment we brought them to. To slaughter these elk in the interests of dairy sadly brings truth to every doubt American soldiers have about the government we support.

The elk could be a chance to show leniency, the truest form of power, and give the Coastal Commission a loyal and outspoken following, vice the current amount of voices ready to denounce your agency.

I ask you to think of the preservation of life, and what that means to you. As a former instrument of government mandated euthanasia I heavily weigh it on your hearts to choose life, and allow the bureaucracy cycle to be broken. This is your chance to give grace, and in doing so choose the environment from which we have reaped wealth for centuries, and pay it forward so our children can grow to know and love the same California that brought and kept us all here.

Sincere regards,

Robert Tysor
US Navy 2006-2015
Richmond, CA
520-465-5909

Sent from my iPhone

From: Lindsay Dimitri <lindsaydimitri@outlook.com>
Sent: Thursday, December 17, 2020 7:01 PM
To: Coastal Point Reyes Management Plan <PointReyesManagementPlan@coastal.ca.gov>
Subject: Point Reyes General management Plan

To whom it may concern:

As a field ecologist, I am incredibly disappointed and concerned to see the commission's plan that prioritizes agriculture and industry over healthy ecosystems that are sustainable over the long term. In one of the West Coast's only National Seashores, ecosystem function and healthy wildlife should be the priority as the NPS is supposed to preserve areas for the greater good, not for a few agricultural interests. The plan will negatively impact biodiversity and is putting the ecosystems contained within the seashore at further risk from the impacts of climate change. This unique ecosystem should be preserved and the biodiversity within prioritized above all else and protected at all costs.

Sincerely,
Lindsay A. Dimitri, M.S.
Ecology Lab
Great Basin Rangelands Research Station
Reno, NV

Sent from [Mail](#) for Windows 10

From: Lisa Stanziano <lisa.stanziano@gmail.com>

Sent: Thursday, December 17, 2020 6:40 PM

To: Coastal Point Reyes Management Plan <PointReyesManagementPlan@coastal.ca.gov>

Cc: Weber, John@Coastal <john.weber@coastal.ca.gov>; Carey_feierabend@nps.gov;
Craig_Kenkel@nps.gov

Subject: NPS's chosen plan B is NOT consistent with the CA Coastal Act

Dear Members of the California Coastal Commission,

The last time I took an out of town visitor to see the Tule elk at Point Reyes, I was appalled and embarrassed. To get to the Pierce Point elk reserve one drives through miles and miles of barren, overgrazed hills. And the stench was so bad we had to keep the windows closed and recirculate the air in the car. Eventually we saw the amazing elk. We also saw barbed wire fences, large modern dairy barns, signs that prohibited trail access, and unsettling enclosures with baby cows in a field. My friends couldn't believe this was a California public park ("California is usually so environmentally progressive."

I'm not a scientist but I can see (and smell) that the National Park Service is not managing this beautiful coastal park in a healthy way. The coastal views are NOT consistent with Coastal Act, Article 6. Access to beaches and trails is blocked, which is not consistent with Article 2. Even more disturbing is the information documented in the NPS's own EIS report that e-coli bacteria levels have tested beyond legal limits, and haven't even been measured in 7 years. The manure runoff into the creeks and streams, and into the Pacific Ocean is not consistent with Article 4 of the Coastal Act, which addresses water quality issues. This is a public health hazard as well as dangerous to the local marine ecosystems.

The NPS report card for supporting the Coastal Act is grim. I implore you to help hold the NPS accountable. By law, the National Park Service is mandated to manage all national parks in a manner that provides maximum protection, restoration, and preservation of the natural environment for generations to come. The NPS can take this opportunity to do the right thing and so can the Coastal Commission: by standing up for the Coastal Act.

While Management Plan F (phasing out ranching) is the only plan that fulfills the mandate for a healthy park and coast, the NPS preferred Plan B is surely the worst plan. Plan B would not only continue the current damaging ranch practices but introduce other livestock, row crops, and businesses like B&Bs, all of which would be even more detrimental to the fragile ecosystems in the park, especially in regard to water issues, not to mention the killing of "nuisance elk."

Please help save our Point Reyes National Seashore by holding the NPS accountable and maintain that Plan B is not consistent with the Coastal Management Act.

Sincerely,
Lisa Stanziano
San Francisco, CA

From: tallyhomar@aol.com <tallyhomar@aol.com>
Sent: Thursday, December 17, 2020 6:30 PM
To: Coastal Point Reyes Management Plan <PointReyesManagementPlan@coastal.ca.gov>
Subject: Point Reyes Management Plan review

December 17, 2020

California Coastal Commission

Re: Point Reyes National Seashore proposed management plan

Dear Commission members:

I'm writing as a citizen who has been hiking, beach walking and horseback riding at Point Reyes for five decades. It is one of my favorite places in the world, and I'm grateful the land is protected as a unit in the National Park Service.

However, disappointment and disillusionment have set in because of the Seashore's proposed management plan, which would expand cattle and dairy ranching activities and "cull" (kill) native tule elk, even in the face of thousands of comments against the plan and even though the plan clearly violates the park's mission and mandate.

I'm hopeful that the Coastal Commission will use their opportunity to review the Seashore's plan to make decisions for the long-term health and recovery of the coastal lands and encourage the Seashore to realign itself with its mission in future management decisions.

As I understand it, the Coastal Zone Management Act (Chapter 3) contains requirements that apply to the situation at Point Reyes.

Article 2: Development should not interfere with the public's right to access beaches. Yet that is exactly what is happening at Point Reyes. Miles of unsightly barbed wire fences block public access to beaches. The buildings of the ranches are not quaint, historic, picturesque structures but industrial farming, modern eyesores.

Article 3: Recreational use should have priority over commercial development. The ranches are commercial enterprises located on public land that happens to have the highest level of environmental protection in the United States, the National Park Service. They were due to be phased out decades ago, but through political maneuvering have managed to hang on and now have been given the chance to expand their operations with other animals and crops. The Coastal Commission has a chance to right this wrong simply by acting in the public interest, not for special interests.

Article 4: Wetlands protection and water quality standards must be priorities for a healthy coastal environment. At Point Reyes, unfortunately, the cattle ranch area (30% of the park's lands) is a major polluter of hillsides, streams and the ocean with too many cows grazing, loosening soil that runs off, and of course too much manure. For this to happen in a national park is unconscionable. The Coastal Commission, if it follows its own guidelines, can be the prick of conscience that can help get the Park Service back on track in caring for the land.

Article 5: Protection of environmentally sensitive habitat is critical. In the coastal area of Point Reyes, many native species are affected adversely by polluted water and trampled hillsides, e.g, coho salmon, red-legged frog, snowy plover, as well as native and rare grasses and flowers. If the Seashore was doing its job, this would be a top priority.

The Coastal Commission can use its weight and reputation to move Point Reyes National Seashore in the direction it needs to be going -- to restore the native coastal prairies that should be flourishing there and to improve water quality so that all creatures in the area can thrive.

As a similar government agency in the environmental field, I realize it is not easy for the Coastal Commission to criticize the National Park Service. In this case, by rejecting their proposed preferred Alternative B and asking them to reconsider Alternative F (to phase out ranching), you will be doing the Park Service, the public, and the coastal lands an immense service. You will be standing up for the environment, against special interests, as you have done so well in the past.

Thank you for considering my heartfelt opinion, and thank you for the work you do. I only write out of love for Point Reyes National Seashore and our magnificent California coast.

Sincerely,

Marilyn Miller
701 Tally Ho Court
Clayton, California 94517
tallyhomar@aol.com
925-672-7750

From: ohamber09@everyactioncustom.com <ohamber09@everyactioncustom.com> on behalf of Amber Tysor <ohamber09@everyactioncustom.com>
Sent: Thursday, December 17, 2020 6:03 PM
To: Weber, John@Coastal <john.weber@coastal.ca.gov>
Subject: "Protected" Land

Dear John Weber,

I am appalled and absolutely devastated to hear of the plan intended to be carried out by the National Park Service in Point Reyes. I treasure our seashore and native wildlife, and growing up in Marin I loved hearing of the conservation success story of the tule elk. I frequent this area to whale watch, but watching the land decay and become nothing but cow feces breaks my heart. Piles of tires and desolate monotone landscape filled with cattle is what is occupying the area that native fauna and flora once thrived. The cows have eaten and trampled the land into an absolute wasteland. The cow feces and urine has contaminated the water sources that our coho salmon, tule elk, and even grey whales depend on for survival. Why aren't these things being taken into account when moving forward with this plan? These ranchers all have operations outside of Point Reyes, and they were already paid to leave, so why are we choosing a plan that not only favors them, but is also the most destructive to our National Park? Public favor clearly opposes this decision and it is very obvious that the land and wildlife are suffering. This is supposed to be protected land. Please protect it.

Sincerely,
Amber Tysor
Richmond, CA 94801
ohamber09@hotmail.com

From: Nazan Aktas <nazanroseaktas@gmail.com>

Sent: Thursday, December 17, 2020 5:35 PM

To: Coastal Point Reyes Management Plan <PointReyesManagementPlan@coastal.ca.gov>

Subject: Please Reject NPS Plan

Hello,

I'm a 14 year resident of the Bay Area and I am urging you to please reject NPS's plan. This plan is completely tone deaf to the times that we are living in. The dairy and animal agriculture industry are on a decline and more and more people are making changes to their lives in order to address the biggest threat to us all, climate change. This country has pushed around the Indigenous land, animals, plants and people since it's inception and now a large portion of the public is saying enough is enough. Point Reyes is a perfect example of how profit has been prioritized over preserving the ecosystem. The Tule Elk were reintroduced to the area in an effort to try and change the destructive path we've been on but the NPS management seem to not care about them or the land at all. It's absolutely astonishing that so much of Point Reyes' land is being used for ranching when it's supposed to be a National Public Park and a place that preserves wildlife! I understand that the park would not have existed without the help of ranchers. But that was decades ago and I think it is possible to shift gears and let nature thrive again. Let's be on the right side of history before that land becomes completely barren and we lose the Elk for good.

Thank you for your time,

Nazan

From: Daniel C. Eckhard <teledan@comcast.net>
Sent: Thursday, December 17, 2020 5:28 PM
To: Coastal Point Reyes Management Plan <PointReyesManagementPlan@coastal.ca.gov>
Cc: Weber, John@Coastal <john.weber@coastal.ca.gov>; Carey_feierabend@nps.gov;
Craig_Kenkel@nps.gov
Subject: Point Reyes Long Range Planning

To the California Coastal Commission and others involved in the management of Point Reyes National Seashore:

I am a Berkeley native and frequent visitor of Point Reyes, and am concerned about the plan to allow continuation of farming on Point Reyes at the expense of public access, the health of the Tule Elk, and the health of the park itself. I know that the farm operations should have ceased after their leases expired many years ago, similar to the Drakes Bay Oyster Farm which was closed down and removed a few years ago. Though I truly enjoyed the oysters that the Drakes Estero farm produced, and the impact of the oyster farm on the Estero was relatively small, I understand that it's removal was part of the goal of the Parks Service and Coastal Commission to protect the park and the recreation it offered.

The current farming operations on Point Reyes have a HUGE impact on the park, degrade and pollute the land, pollute the nearby ocean and Tamales Bay, destroy native plants and habitat for native animals, and have terrible effects on the Tule Elk for many reasons. I believe you are already very aware of these problems and know that allowing these farms to stay violates numerous stated priorities for the Coastal Zone Management Act. The articles that concern me, and should concern you, are the following, and they should be in the front of your mind when considering what to do with the farms on Point Reyes:

Article 2: development shall not interfere with the public's right to access the sea and coastal beaches
Article 3: recreation, placing a priority on coastal dependent....recreation over development
Article 4: protection of the marine environment, including water quality issues, wetland protections
Article 5: protection for environmentally sensitive habitat
Article 6: protection of coastal views

Allowing the farming operations to continue VIOLATES EVERY SINGLE ARTICLE above! Please don't ignore these important priorities when you go forward with the Point Reyes plan. Keep in mind that Point Reyes is a wonderful resource that people visit for a taste of what wild California once was, and to see healthy native plants and animals, particularly Tule Elk. We can clearly see that the Tule Elk are suffering from being fenced in by the farms, unable to get to the water and food they need to survive and flourish. No one visits to see pulverized land, cows and their dung, and modern dairy operations.

Please do the right thing and allow Point Reyes to become the spectacular park it should be.

Thank you for your time and protecting what little wild California remains.

Respectfully,

Daniel C. Eckhard

From: Sheryl Owyang <sherylrowyang@yahoo.com>
Sent: Thursday, December 17, 2020 5:18 PM
To: Coastal Point Reyes Management Plan <PointReyesManagementPlan@coastal.ca.gov>; Weber, John@Coastal <john.weber@coastal.ca.gov>; Ryan_olah@few.gov
Cc: Weber, John@Coastal <john.weber@coastal.ca.gov>; Carey_feierabend@nps.gov; Craig_Kenkel@nps.gov; Ryan_olah@few.gov
Subject: Point Reyes Cattle Ranch Leases

Dear California Coastal Commissioners,

I'm a Bay Area Native and continue to live and work locally. I love the outdoors, wildlife, and wild spaces. Point Reyes National Seashore is one of the precious few of these special places in California. As commissioners you have the opportunity to not only help preserve but to also help restore Point Reyes to it's natural landscape for all Americans to enjoy.

Sadly, the public's access to this beautiful coast is blocked by hundreds of miles of cattle fencing, barbed-wire and large herds of 1,000 pound cattle that are allowed to occupy 30% of the National Seashore even though it is supposed to be the most protected public land. On the cow side of the fence, the land is barren and covered in foul smelling manure. The historic character of cattle farming at the seashore is marred by industrial dairy barns, rows of plastic calf pens, and huge mounds of manure covered with tarps and old tires that block vistas of the natural coast. The cattle ranchers regularly bulldoze tons of cow manure into large holding ponds called lagoons. They sow muddy pastures with nonnative grasses grown as silage to feed calves in the spring. Tanker trucks pump liquified manure with nitrogen and E.coli out of holding ponds and spray it as fertilizer allowing invasive thistles to colonize the fields. Rare native plants such as coastal marsh milkvetch and checkerbloom can not compete. When it rains, the manure gets into the creeks and the NPS sometimes has to close the public beaches due to high levels of bacteria from manure pollution. Bay Area locals like me and tourists from around the world come to Point Reyes National Seashore to see native wildlife including the endangered native tule elk, elephant seals along the beaches, snowy plovers, whales off shore, and salmon runs. Unfortunately, what we see are too many cattle, manure piles, ugly barns, bare ground, and erosion.

According to USDA statistical methods, the 5,600 cows in Point Reyes excrete over 100 million pounds of manure into pastures, ponds, and streams. And a 2013 study by US Department of Interior scientists found that California's highest reported E. coli levels occurred in wetlands and creeks draining Point Reyes cattle ranches near Kehoe Beach, Drake's Bay, Abbotts Lagoon, and Tomales Bay. The NPS own studies show that this decomposing waste releases harmful chemicals into the park's streams, ponds, wetlands, and estuaries, Tomales Bay, and the Pacific Ocean. The California Regional Water Quality Control Board regularly grants Point Reyes ranchers waivers from complying with water safety regulations that limit discharges of fecal matter and pesticides. Even the limited EIS acknowledges that removing the pollution produced by the ranches would save federally protected or threatened species from extinction, including Coho and Chinook salmon, steelhead, red legged frogs, California freshwater shrimp, Myrtle's silverspot butterflies and snowy plovers. Local species of insects, birds and plants would thrive in the absence of commercial ranching as would flocks of birds that shelter at the seashore.

The original plan when Point Reyes National Seashore was established in 1962 included an agreement with the ranchers to leave within 25 years. At that time, the ranchers were paid \$57 million (equivalent to \$382 million today) of taxpayer money, but due to ongoing lobbying by special interest groups, the ranchers have been allowed to stay and the NPS wants to extend these leases for 20 more years at subsidized rates 50% below market value. Many of the Point Reyes ranching clans own property outside the park in West Marin where

they can continue operations. The Point Reyes ranches employ 64 full time employees and generate \$16 million in revenue annually, whereas tourism contributed \$134 million to the local economy in 2018.

This commission is tasked with protecting and enhancing California's coast and ocean for present and future generations. Please act now to stop the NPS from extending the cattle ranch leases in Point Reyes until comprehensive environmental impact studies are conducted.

Thank you for your time and consideration.

Dr. Sheryl Owyang
San Francisco, CA

From: Tyler Petersen <tpeter25@calpoly.edu>

Sent: Thursday, December 17, 2020 4:09 PM

To: Coastal Point Reyes Management Plan <PointReyesManagementPlan@coastal.ca.gov>

Subject: Rejecting PRNS management plan

Dear California Coastal Commission,

My name is Tyler Petersen. I am a current student at California Polytechnic State University in San Luis Obispo. My degree is Hydrology and Watershed management and I write you today as a concerned future Hydrologist for the status of my home National Park, Point Reyes National Seashore. I am disturbed by the plan the park is recommending to increase farming operations in the seashore. The destruction of dairy and cattle operations are nothing unknown and having these operations continue inside a national park is not in compliance with the California Coastal Act and harms to our national seashore will be irreversible. We are at a point in time where biodiversity and healthy abiotic environments is crucial to sustaining our natural environments. I am completely against the PRNS plan to continue farming operations especially while using my tax dollars to make a profit. Please I urge you to reconsider this plan and to give myself hope and dreams of restoring this precious environment to its natural conditions. Thank you.

-Tyler Petersen

December 17, 2020

Mr. Larry Simon
Federal Consistency Program
California Coastal Commission
45 Fremont Street, Suite 2000
San Francisco, CA 94105

Subject: Coastal Consistency Determination for the Point Reyes National Seashore and North District Golden Gate National Recreation Area General Management Plan Amendment and Environmental Impact Statement

Dear Mr. Simon:

As a resident of Marshall, California, and owner of the Straus Dairy Farm in Marshall, and founder/CEO of Straus Family Creamery, I support the National Park Service's (NPS) request for a Coastal Consistency Determination (CCD) for the Point Reyes National Seashore (PRNS) and Northern District of the Golden Gate National Recreation Area (GGNRA) General Management Plan Amendment Environmental Impact Statement (GMPA EIS). The GMPA EIS is consistent with the California Coastal Plan of the last ten years and supports local agriculture and a sustainable organic farming and food system. Organic farming and food production protects the environment and people – especially soil and water quality – and can improve the community's health because we are producing food that is grown without pesticides, synthetic fertilizers, and GMOs.

The primary policy applicable to the GMP Amendment is the Land Resources policy, which addresses lands suitable for agricultural use. The Commission emphasizes that: "The Coastal Act includes provisions to protect and enhance coastal resources and land uses, including agriculture. Strong protection of agricultural lands and the agricultural economy in the coastal zone is mandated by the Coastal Act. These protections include requiring that prime agricultural lands be maintained in agricultural production, restricting the conversion of agricultural lands to other land uses, conserving agricultural soils, and promoting long-term agricultural productivity." Coastal Commission, <https://www.coastal.ca.gov/agriculture/>. More specifically, the Marin County Local Coastal Plan ("LCP") strongly supports continued agricultural production on the Point Reyes ranchlands "and the important role which agriculture in the parks plays in Marin's agricultural economy." Consistency Determination ("Consist. Det.") at 5.

Straus Family Creamery has been in business for more than 26 years and now purchases certified organic milk from 12 dairies (six in Marin County), including two in PRNS. The six Marin County organic dairies represent tens of millions of dollars in annual sales and contribute heavily to the local rural economy.

Farming and ranching on the Seashore contributes to the stability of the entire Marin County farm system. According to Marin County, the Seashore ranches and dairies account for nearly 20% of all gross agricultural production in the County. These ranches and dairies play a critical role in maintaining the viability of the Marin County agricultural infrastructure and economy. Beef and cattle ranching on the Seashore represent 15% of total cattle ranching sales, and dairy production represents 40% of dairy production sales in Marin County. GMP Amend. at 102-103.

We have participated actively throughout the many years to support the National Environmental Policy Act (NEPA) process used by NPS staff to develop the GMPA EIS, providing comments and offering our organization as a resource for NPS staff and affected agricultural producers ranching on the GMPA EIS.

Throughout this engagement, we appreciate NPS staff's receptiveness to options and technical information that contribute to individual farm and ranch viability and environmental stewardship and integrity. We also have benefited from NPS staff explanations of the origins and intent for PRNS and GGNRA, NPS administrative and management process, and outreach throughout the NEPA process.

The resulting Preferred Alternative (Alternative B in the GMPA EIS) epitomizes that receptiveness and community engagement and the balance of cultural and natural resource management that NPS is mandated to integrate on PRNS and GGNRA. Furthermore, the Preferred Alternative has significant parallels and even mirrors the California Coastal Act (CCA). Specifically, CCA intent is to protect California's coast from development impacts so that coastal environments and ecosystems, recreational opportunities, and agricultural lands are enhanced.

The GMPA EIS Preferred Alternative similarly provides 20-year leases and establishes strict ranch operating agreements using tested practice standards and measures (GMPA EIS Appendix F) to support sustainable and regenerative agriculture. This creates stability for the current and next-generation farms and allows them to invest in the future and sustainable organic farming practices. Our overall goal is to create a net carbon-neutral organic dairy farming model that supports environmental stewardship, economic stability for farmers and encourages best management practices. We look to continue expanding this model in the next few years to the farms in PRNS that supply certified organic milk to Straus Family Creamery. The GMPA EIS also establishes the management plan and measures that allow the NPS to have the tools to manage the herd size and the impacts to the ranchers and farmers. Lastly, the GMPA EIS provides direction and a framework for educating the public on the historic ranches and sustainable farming practices in the Seashore.

Because of this shared policy purpose and goal between CCA and GMPA EIS and the overall rigor and thoroughness of the GMPA EIS, I support the NPS' request for a Coastal Consistency Determination for the requested action. We thank you for this opportunity to provide my comments and for your consideration.

Sincerely,

Albert Straus
Marshall, California



San Francisco Bay Chapter
PO Box 2663
Berkeley, CA 94702

December 17, 2020

VIA EMAIL

California Coastal Commission
455 Market Street, Suite 300,
San Francisco, CA 94105

Re: Agenda Item CD-0006-20 (NPS, Point Reyes GMPA); Consistency Determination for the Point Reyes National Seashore General Management Plan Amendment (GMPA) and Environmental Impact Statement

Dear Commission Members:

The Sierra Club is very concerned about the water quality problems that exist in Point Reyes National Seashore (PRNS or PORE) and Golden Gate National Recreation Area (GGNRA or GOGA) with respect to Agenda Item CD-0006-20. These problems existed when the National Park Service (NPS) acquired the lands for these two national park units and there has never been any improvement. Conditions today are completely unacceptable. The Sierra Club requests that the Commission object to the Park Service's CD.

The two relevant sections of the California Coastal Management Program (CCMP) are:

Section 30230 Marine resources; maintenance

Marine resources shall be maintained, enhanced, and where feasible, restored. Special protection shall be given to areas and species of special biological or economic significance. Uses of the marine environment shall be carried out in a manner that will sustain the biological productivity of coastal waters and that will maintain healthy populations of all species of marine organisms adequate for long-term commercial, recreational, scientific, and educational purposes.

(Emphasis added.)

Section 30231 Biological productivity; water quality

The biological productivity and the quality of coastal waters, streams, wetlands, estuaries, and lakes appropriate to maintain optimum populations of marine organisms and for the protection of human health shall be maintained and, where feasible, restored through, among other means, minimizing adverse effects of waste water discharges and entrainment, controlling runoff, preventing depletion of ground water supplies and

substantial interference with surface waterflow, encouraging waste water reclamation, maintaining natural vegetation buffer areas that protect riparian habitats, and minimizing alteration of natural streams.

(Emphasis added.)

In its CD, the Park Service basically tells the Commission to be patient, things are going to get better for water quality under its new preferred alternative because (1) the Park Service is going to institute a zoning system for ranching that will better protect land and water resources on each ranch in the two parks and (2) it's going to establish "a suite of resource protection . . . measures [i.e., BMPs] that would . . . further reduce pollutant discharges from the ranched lands."

The status quo ranching program is bad enough for the water quality and 20 more years of that would further impact water quality in a negative way, especially with diversification.

The Park Service's Claim that It's New Zoning System Will Better Protect Land and Water Resources. Currently, all of the land of each ranch can only be used for grazing. Under the zoning system, 65% of the land will still be set aside for grazing only and will be called the "range," but the rest of the land will be open to more uses. Thirty four percent of the land will be called "pasture" and 1% will be called the "ranch core." Those latter two locations are where diversification will take place. Diversification involves raising additional species of domestic animals (sheep, goats and 500 chickens per ranch, all of which will cause conflicts with coyotes and other predators), row crops on up to 2.5 acres, processing and sale on site of farm products, including meat (i.e., slaughtering animals on site), farm tours and farm stays (i.e., B&Bs). This is not an improvement over the status quo, but the reverse. Now, all the land is limited to grazing. The preferred alternative will provide for further commercialization and greater impacts to resources on 35% of each ranch. This will have serious new consequences on the land and water resources of the two parks.

BMPs. The Park Service says it is going to establish "a suite of resource protection . . . measures [BMPs] that would . . . further reduce pollutant discharges from the ranched lands" and refers the reader to Appendices A and F of the Appendix. Appendix A is a map showing over 100 construction projects to be built on the ranch lands. They take the form of new buildings, fences, infrastructure improvements, dozens more new livestock water supplies (often new ponds built where seeps or springs exist, thereby interfering with the flow of watercourses), manure management, road decommissioning and upgrading, pond restorations, stream crossings and waterway stabilizations. Appendix F is a list of construction projects to be done and a reference to the Department of Agriculture's Natural Resource Conservation Service (NRCS) standards for that type of construction project. How all these construction projects using NRCS BMPs will "further reduce pollutant discharges from the ranched lands" is hard to comprehend. BMPs are not new between the Park Service and the ranchers and they won't work any better now than before.

The Park Service states that the Preferred Alternative "improves conditions affecting sensitive coastal resources and water quality" and is "maximally consistent with Sections 30230-30231 of the California Coastal Act." That is simply not true, as shown below.

The 2019 GMPA Draft Environmental Impact Statement

NPS's DEIS was commented on by over 7,600 people. Among those that commented was the San Francisco Regional Water Quality Control Board (SFRWQCB) whose comments follow this excerpt from the DEIS. The DEIS provides in pertinent part as follows:¹

The San Francisco RWQCB listed Tomales Bay, and major Tomales Bay tributaries, including Lagunitas Creek and Olema Creek, as impaired for **nutrients, pathogens, and sedimentation/siltation** under section 303(d) of the Clean Water Act (SWRCB 2010).² Sources of **nutrients** and **potentially pathogenic bacteria** include animal waste, human waste from failing septic or treatment systems . . . Sources for elevated concentrations of **total suspended solids** include . . . historical and current agricultural practices.

Drakes Bay and Drakes Estero³ Watersheds. NPS programs and other sampling efforts have observed **high concentrations of total suspended solids** and **nutrients** in Drakes Bay and Drakes Estero watersheds (NPS 2004a; Pawley and Lay 2013). Surrounding land uses such as ranches and pastures for dairies and other livestock operations contribute nutrients and **sediment** to Drakes Bay and Drakes Estero (NPS 2004a). Occasionally **high potentially pathogenic bacteria** counts have been observed in some drainages (Pawley and Lay 2013). **Potentially pathogenic bacteria** pollutant sources in these watersheds include stormwater runoff from pasture and grazing land, sewage systems, wildlife, and boat discharges in the tidal and marine environment (outside the planning area) (CDPH 2011).

¹ The FEIS is similar.

² Lagunitas Creek, Olema Creek and Pine Gulch Creek exist in whole or in part in the ranching areas of the two parks and contain endangered coho salmon. <https://irma.nps.gov/DataStore/DownloadFile/153623> Those streams and many, many others in the ranching areas of the two parks also contain threatened steelhead. See <http://npshistory.com/publications/pore/nrr-2019-1895.pdf>, Appendix D, for a discussion of 18 streams in PORE and 21 streams in GOGA with steelhead. Some have dams on the ranch lands which can interfere with spawning. *Ibid.* For example: "There are small dams on several of the tributaries that drain into Olema Creek, many of which likely restrict steelhead movement." *Ibid.*, at 292. Olema Creek begins and ends on park land. Presumably, some if not all of these tributaries, and their dams, are on park land as well. Removing these Park Service-owned dams would greatly benefit steelhead and, presumably, coho salmon.

³ Steelhead, a threatened species, use Drakes Estero. They have been observed in a least two creeks draining into the estero, namely Home Ranch Creek and East Schooner Creek. <http://npshistory.com/publications/pore/nrr-2019-1895.pdf> at 294. Steelhead once used Schooner Creek, but, unfortunately, they apparently no longer do. *Ibid.* Continued ranching may eliminate them from Home Ranch Creek and East Schooner Creek as well.

Kehoe Drainage, Abbotts Lagoon,⁴ Coastal Drainages. In 1999–2000, USGS conducted a water quality assessment of the Abbotts Lagoon watershed. The study determined that tributaries draining dairy operations or dairy grazing land had **the highest nutrient levels or loading rates** especially following storm events (USGS 2005). Data collection in Kehoe Creek has shown elevated levels of contaminants including **nutrients** and **sediment** (NPS 2004a; Pawley and Lay 2013). Stormwater runoff from nearby dairy operations and pasture land into Kehoe Creek is contributing to these high levels. High **potentially pathogenic bacteria** counts have also been observed in Kehoe Creek and Abbotts Lagoon, and many samples exceeded the **potentially pathogenic bacteria** standard (Coopridge 2004; Pawley and Lay 2013). Many of these exceedances occurred near dairy operations.

DEIS at 66-71. (Emphasis and bolding added.)

The Regional Water Board’s Comments on the Preferred Alternative.

The San Francisco Regional Water Quality Control Board (SFRWQCB) commented on the Draft EIS and would not appear to agree with NPS’s statement that the Preferred Alternative “improves conditions affecting sensitive coastal resources and water quality.”

The Water Board listed Tomales Bay, and major Tomales Bay tributaries, including Lagunitas Creek and Olema Creek, as impaired for **nutrients, pathogens, and sedimentation/siltation** under section 303(d) of the Clean Water Act (SWRCB 2010). The proposed diversification and increased public use facilities (trails, picnic areas, and housing with associated restrooms and septic systems) could potentially increase discharges of **sediment, pathogens, nutrients, and pesticides**. Further, these activities may alter watershed hydrology (surface water and groundwater flows) and degrade wetland, riparian and stream integrity and function. Increases in the discharge of **pollutants** above existing baseline levels and loss of habitat critical to beneficial use function would violate State Antidegradation Policy (State Water Resources Control Board Resolution No. 68-16).

(Emphasis and bolding added.)

The Board’s DEIS comment letter goes on to state:

The Draft EIS, however, does not adequately identify all potential adverse water quality impacts for the proposed land-use changes, including diversification in the Range (goats, sheep, chickens) and Ranch Core Subzones (pigs, sheep, goats, chicken), row crops in the Ranch Core Subzone, and increased public use facilities. Further, the draft EIS does not adequately incorporate mitigations for these impacts

⁴ Abbotts Lagoon is fed, in whole or in part, by Abbotts Creek. Abbotts Creek is an anadromous creek used by steelhead. <http://npshistory.com/publications/pore/nrr-2019-1895.pdf> at 295. Located in the Central California Coast, this distinct population segment is listed as threatened under the Endangered Species Act.

We are concerned that many of the proposed Ranch Core Subzone diversification activities will lead to new exceedances which cannot easily be remediated due to technical or financial feasibility.

https://www.nps.gov/pore/getinvolved/upload/planning_gmp_amendment_deis_public_comments_5027-7624_200302.pdf Comment number 7018. (Emphasis added.)

The Park Service's Own Assessment of Water Quality at PORE and GOGA.

By far the most thorough assessment of the waters of PORE and GOGA is the 259-page "Coastal Watershed Assessment for Golden Gate National Recreation Area and Point Reyes National Seashore" published in 2013. It was produced by the Park Service's Natural Resource Stewardship and Science Office in Fort Collins, Colorado. <http://npshistory.com/publications/goga/nrr-2013-641.pdf> Among its findings:

Currently there are six operating dairies in PORE-managed lands. **Extremely high fecal coliform concentrations** have been documented in streams adjacent to existing dairy operations (Ketcham 2001 and see Water Quality chapter). Manure spreading areas are correlated with the increased presence of invasive and noxious weed species. Dairies and ranching are associated with other impacts to wetland and riparian process.

Ibid, at 41. (Emphasis and bolding added.)

Internal sources of **pollutants** from recreational practices and land uses that were grandfathered in, with the creation of PORE and GOGA,⁵ continue to be problems. PORE and northern GOGA contain numerous ranches, dairies and pasture lands, which contribute to **water quality degradation**, due to **excessive nutrient enrichment from feces and runoff**. . . **Nitrogen-loading** in shallow estuarine embayments can lead to shifts in the dominant primary producers (e.g., macroalgae may replace eelgrass), which can lead to declines in **dissolved oxygen**, altered benthic community structure, altered fish and decapods communities and higher trophic responses (Bricker et al. 1999).

Ibid, at 62. (Emphasis and bolding added.)

The main management issues facing PORE and northern GOGA are related to **balancing the historical and cultural traditions of ranching and dairy establishments with the very high water quality needed for endangered species**

⁵ No sources of pollutants were "grandfathered in" by the legislation for the two parks. Ranching is discretionary. Ranching may only be allowed in these two parks "[w]here appropriate in the discretion of the Secretary." 16 U.S.C. § 459c-5 and 16 U.S.C. § 460bb-2. NPS could stop ranching today. In fact, it is one of the alternatives in the GMPA/EIS. That ranching is supposed to go on forever is a falsehood.

such as coho salmon, steelhead trout, California freshwater shrimp and California red-legged frogs.⁶

Id., at 115. (Emphasis added.)

The Coastal Watershed Assessment then addresses the parameters for assessing water quality, namely **conductivity**, **turbidity**, **dissolved oxygen**, **nitrogen (and related constituents)**, **phosphorus** (and related constituents) and **pathogens** (and related constituents).

Water Quality Parameters

Conductivity/Specific Conductance. (pp. 136-139).

Conductivity, the ability of a solution to pass an electric current, is an indicator of dissolved solids . . . Ideally, streams should have **conductivity** between 150–500 µS/cm to support diverse aquatic life (Behar 1997).

PORE:⁷ In PORE and northern GOGA . . . Values higher than 1,700, indicating **severe pollution**, occurred at dairy locations, including North Kehoe Creek (PAC2A), at the J Ranch [Kehoe] and K Ranch property line (PAC2B) [Evans], the L Ranch Impact Yard (PAC1B) [Mendoza], the A [Nunes] and B Ranches (DBY3, DBY2) [Mendoza] and the McClure's [I Ranch] dairy swale (ABB3).

Id., at 136-137. (Emphasis added.)

Turbidity/Total Suspended Solids (TSS) (pp. 139-141)

In PORE and northern GOGA, 64 **turbidity** measurements were made from 1999 2005 (Figure 63). The median is 3.82 NTU with an IQR from 0.77–24.03 NTU. The mean value was 68.82. Almost one-fourth of the measurements exceeded the WRD screening criteria of 50 NTU and over half the samples exceeded EPA guidance of 1.2 NTU for pristine conditions, indicating that **high turbidity** may be a problem in some locations. It should be emphasized that much of the sampling occurred during or immediately following storm events to capture the worst conditions. There are a paucity of measurements compared to other parameters, but some sites had **extremely high turbidity** measurements, including sites along the mainstem and tributaries of Olema.

⁶ There is no requirement to balance ranching and endangered species. Ranching is discretionary. Furthermore, the Park Service is legally required to protect natural resources above all other uses. 54 U.S.C. § 100101, 16 U.S.C. § 459c-6 and 16 U.S.C. § 460bb. The Ninth Circuit has held that “resource protection [is] the overarching concern” in the management of national park system units. Bicycle Trails Council of Marin v. Babbitt, 82 F.3d 1445, 1453 (9th Cir. 1996).

⁷ When the assessment refers to “PORE” it intends to include the 10,000 acres of ranching in GOGA that PORE manages for GOGA under a cooperative agreement.

OLM 11 at Bear Valley Bridge exhibited the highest measurements (887 NTU), followed by South Kehoe (PAC1), Five Brooks (OLM14) and Lower Olema Creek (OLM10B). B Ranch (DBY2) and Creamery Creek (DES1) were also fairly high.

Id., at 139-140. (Emphasis and bolding added.)

Dissolved Oxygen (pp. 141-142).

The RWQCB objectives for **DO** in inland (fresh) waters are 7.0 mg/L (ppm) or above for cold water habitat and 5.0 mg/L (ppm) or above for warm water habitat (CRWQCB 2007a) . . .

PORE: An analysis of Legacy STORET data (397 observations from 62 stations) prior to 1999 indicated that less than 1% of the observations had **DO** levels below 4.0 mg/L (ppm) from 1959 through 1991 . . .

From 1999 to 2005, 968 measurements had a median value of 9.3 mg/L (ppm) and an IQR from 7.4–10.6 mg/L (ppm). Over 75% of the samples are in a comfortable range for aquatic life (>7.0 mg/L) (ppm) and 90% were >5 mg/L (ppm), the less stringent warm-water criterion. Figure 64 illustrates that a fairly significant number of samples fall below the optimum range. **Extremely low DO** conditions occur in the Kehoe/Abbotts watershed at PAC1 sites, Drake's Estero/Bay at A, B and C ranches (DBY1, 2 and 3), and in the tributaries draining to Drakes Estero. In the upper portion of the Olema watershed, primarily at ranch and horse stable sites, there were a significant number of exceedances. The map in Figure 65 illustrates the percent of samples that exceed standards for the cold and warm water **DO** objective for specific sites. Generally the percent of samples exceeding [not meeting] standards is lower than 50%, except for PAC1 and OLM18 [not meeting standards 51-83% of the time]; however, five cold water sites and two warm water sites had low DO levels for over a quarter [26-50%] of the measured samples.

Id., at 141-142. (Emphasis and bolding added.)

Nitrogen: Total Nitrogen, Ammonia, Nitrate, Nitrite (pp. 142-150)

Nitrogen is essential to biotic production and, in aquatic systems, exists in various forms – **nitrogen gas, nitrate (NO3-), nitrite (NO2-), reactive ammonia (NH4+), urea** and **dissolved organic compounds**. The primary anthropogenic sources of **nitrogen** are sewage, fertilizers and barnyard wastes.⁸ Too much **nitrogen** leads to excessive algal blooms, **low dissolved oxygen** and ultimately fish kills. Sewage and barnyard wastes have **nitrogen** primarily as **ammonia**; fertilizer runoff has **nitrogen** primarily as **nitrate**.

⁸ "Barnyard wastes" is a euphemism for animal waste/manure.
<https://extension.wsu.edu/animalag/content/got-barnyard-runoff/>

Even moderate environmental disturbances such as farming and logging release **nitrate** into solution (Goldman and Horne 1983).

In PORE, **nitrite** was measured 148 times from 1999 to 2005; however, over 75% of the samples were below the detection limits of 0.01 mg/L. The samples above the detection limit were between 0.01–1.10 mg/L. The highest values were in the Pacific Coast watersheds in Kehoe Creek sites, PAC 1, PAC2, PAC2B and in the Drakes Estero watershed at sites near A and B Ranches, DBY2 and DBY3 below dairies. OLM 11 was somewhat elevated. Due to the paucity of results with values above the detection limit, we did not graph or map nitrite exceedance; the exceedance noted tends to mirror the exceedance noted for **nitrate**.

In PORE, **nitrate** (as NO₃-) was measured 463 times from 1999 to 2005 with a median value of 0.52 mg/L, with an IQR from 0.2–1.4 mg/L. A majority of the samples fell well below 10 mg/L (Figure 68); however, several samples exceed this level (Table 26). Over 50% of the samples exceeded 1 mg/L (Figure 68), which is evidence of **nutrient enrichment** [fn. omitted]. The highest percentage of exceedances occurred in the Kehoe/Abbotts watershed, consistent with a previous analysis (Ketcham 2001). Samples at the L Ranch impact yard (PAC 1B) had two extremely high concentrations (400 and 600 mg/L N), indicating high levels of waste loading (Figures 68 and 69). These results are uncommonly high for PORE and are a result of the timing of the sampling event during high storm runoff conditions and the location of the monitoring station, which receives runoff from a densely populated field of grazing cattle. Between 1999 and 2005, over 34% of the samples were below the detection limits of 0.2 mg/L for **nitrate** (as NO₃-).

In PORE, **Ammonia** has been monitored as **reactive ammonia (NH₄⁺)** fairly consistently (N=390) and as **un-ionized ammonia (NH₃)** sporadically (N=29) from 1999 to 2005. The scatter plots depict **reactive ammonia** concentrations (Figure 70) from 1999 to 2005. Over 80% of the samples tested for **reactive ammonia** were below the detection limits. For **reactive ammonia**, the median value was 0.2 mg-N/L with an IQR from 0.2–0.3 mg-N/L. Nearly 10% of the samples were above 0.6 mg-N/L. High measurements were found in Kehoe/Abbotts Lagoon, A and B Ranches. There are no agreed upon standards for **reactive ammonium**.

Almost 70% of the samples tested for **reactive ammonia (NH₄⁺)** from 1999 to 2005 were below the detection limits. Extremely high measurements were found in McClure (I Ranch) pond draining to S. Kehoe (PAC1A) and the McClure Dairy Swale (ABB3). Measurements above the toxic threshold and the Basin Plan objective of 0.16mg/L (**un-ionized ammonia**) were found in North and South Kehoe, the L Ranch impact yard and A and B Ranches in Drakes Bay. There were too few measurements to show exceedances. The Basin Plan states that receiving waters should not exceed an annual median

of 0.025 mg-N/L or a maximum of 0.16 mg-N/L of **un-ionized ammonia** to protect the migratory corridor in the Central Bay, and 0.4 mg-N/L for the Lower San Francisco Bay (CRWQCB 2007a). The objective was used to evaluate possible lethal conditions.

Id., at 142-148. (Emphasis and bolding added.)

Phosphorus: Phosphate, Total Phosphorus, Orthophosphate (pp. 150-153)

Like **nitrogen**, **phosphorus (P)** is critical to biotic production; however, excessive levels lead to algal blooms and low dissolved oxygen. Sources of **phosphorus** include soil sediments, fertilizer runoff, animal wastes and detergents

PORE: . . . From 1999 to 2005, **orthophosphorus** was measured 164 times with six results below the detection limit, a median value of 0.22 mg/L and an IQR of 0.13–0.47 mg/L. Our review of the data indicated a few extremely high values, particularly in the Kehoe/Abbotts watershed at PAC1 and PAC2 and the A and B Ranch areas in the Drakes Bay watershed (DBY2 and DBY3).

Id., at 150-151. (Emphasis and bolding added.)

Pathogens: Fecal Coliform Total Coliform and E. coli bacteria (pp. 153-156).

Fecal contamination can result from ineffective management of human wastes, such as leaking septic systems or untreated wastewater. **Fecal contamination** also comes from poor management of animal wastes, as well as manure from dairies and ranches. Low levels of **fecal contamination** also come from wildlife. US EPA numeric objectives for indicator bacteria are listed in Table 27. These objectives are set to be protective of public health and not intended to reflect ecosystem health, although high levels of waste can introduce **nitrogen** into the water causing eutrophication, which affects overall ecosystem health. In PORE, **fecal coliform** has been monitored and found useful in pollutant source tracking, since **nutrients** are so rapidly diluted in streams (Ketcham 2001). Because the samples are not evenly spaced during a 30-day period, we used the single sample objective to evaluate **total coliform** (10,000 MPN/100 mL) and **fecal coliform** (400 MPN/100 mL).

Total coliform was measured 962 times from 1999 to 2005 and depicted a median value of 1,700, with an IQR from 500–9,000 MPN/100 mL, indicating that more than 75% of the samples fell below the maximum water contact recreation criteria for **total coliforms** (10,000 MPN/100 mL). The scatter plot and map (Figure 75 and 76) indicates that there are a large number of exceedances in the Kehoe/Abbotts and Drakes Estero watersheds. Many sites in these watersheds exceeded the standard more that 50% of the time.

Fecal coliform was measured 923 times from 1999 to 2005 and had a median value of 800 MPN/100 mL and an IQR of 200–3,000 MPN/100 mL, indicating that over 50% of the samples exceeded the contact recreation criteria for fecal coliform (400 MPN/100 mL). The scatter plot and map (Figures 77 and 78) show the large number of exceedances in the Kehoe/Abbotts and Drakes Estero watersheds; exceedances occurred in all watersheds, particularly near dairies.

Id., at 153-155. (Emphasis and bolding added.)

For every one of the six pollution parameters discussed in the Coastal Watershed Assessment there was a specific list of the ranches in the various watersheds that were significant violators of that parameter. Based on the 2013 Coastal Watershed Assessment, it cannot be said that the condition of the two parks is consistent to the maximum extent practicable with the CCMP.

Appendix L.

In the FEIS's Appendix is document L which is entitled "Improved water quality in coastal watersheds at Point Reyes National Seashore associated with rangeland best management practices [BMPs], 2000 – 2013."

It is dated July 7, 2020, over nine months after the close of public comments on the DEIS and two months before the release of the FEIS. The authors are three employees of the Park Service at Point Reyes. The first-listed author, Dylan Voeller, is in charge of the ranching/grazing program at PORE and GOGA.

They state that best management practices (BMPs) can control pollution of streams and that between 2000 and 2013, the Park Service monitored water quality in the form of (1) fecal bacteria and (2) turbidity in Drakes Bay/Estero, Kehoe Drainage and Abbotts Lagoon and that during that time BMPs such as fencing, ranch infrastructure management, infrastructure for manure management, off-stream drinking water systems for cattle, and pond restoration were constructed or implemented on dairy and beef ranch operations to improve water quality. This report seems intended to counter what the Park Service's contractor wrote in the DEIS, what the Region Water Board (and others) said in their comments on the DEIS and what the authors of the Coastal Watershed Assessment said regarding water quality in Drakes Bay/Estero, Kehoe Drainage and Abbotts Lagoon.

The authors do not address conductivity, dissolved oxygen, nitrogen or phosphates. They dropped turbidity as an issue by concluding that "[t]urbidity was only monitored consistently from 2010-2013, was generally below selected ecological thresholds at most stations, and did not show a trend over time." In other words, the BMPs did not show any improvements regarding turbidity.

With respect to fecal bacteria, the authors state that *E. coli* is the best constituent for addressing it and they claim *E. coli* is declining over time. As the CD puts it: "the data indicate decreasing trends in fecal indicator bacteria over time." Page 28. Their conclusion is based on 14 monitoring stations. The standard they use for *E. coli* is 320 CFU/100ml. Their table 1 on page 9 shows that the median number for *E. coli* is much higher than 320 for 13 of the 14 testing stations. For example, the median for ABB3 is 48,000 CFU/100ml!

That's 150 times the limit. The highest reading for that same station is 1,600,000 CFU/100ml! The median for PAC1B is 13,600 CFU/100ml! The highest reading for that same station is 1,280,000 CFU/100ml! PAC1S, PAC2 and PAC2A also have had high readings of 1,280,000 CFU/100ml. The one station that is below 320 CFU/100ml, ABB4, is at the far west end of Abbotts Lagoon where any E. coli that reached there would be very diluted. Even it has had high readings of 12,800 CFU/100ml. Finally, the authors never state that the BMPs have lowered E. coli to a median number of 320 CFU/100ml or below.

In conclusion, nothing in the CD shows that the preferred alternative will be consistent to the maximum extent practicable. As discussed above, the zoning system, together with its diversification, will not improve water quality and is more likely to harm it as stated in the SFRWQCB letter. Neither will building a hundred or more construction projects using NRCS's BMPs. They may to some extent lessen the additional damage caused by the construction projects, but that is far from the preferred alternative being "consistent to the maximum extent practicable" with the following from the CCMP: "The biological productivity and the quality of coastal waters, streams, wetlands, estuaries, and lakes appropriate to maintain optimum populations of marine organisms and for the protection of human health shall be maintained and, where feasible, restored . . ." Trying to mitigate future damage is a far cry from maintaining, and where feasible, restoring the biological productivity and quality of these coastal waters, streams, wetlands, estuaries and lakes. The Sierra Club requests that the Commission object to the Park Service's CD.

Sincerely,



s/Olga A. Bolotina
Chair, San Francisco Bay Chapter

cc: Frank Egger; Co-Chair, Water Committee

From: Kathy Kimball <kathy.kimball@gmail.com>
Sent: Thursday, December 17, 2020 4:07 PM
To: Coastal Point Reyes Management Plan <PointReyesManagementPlan@coastal.ca.gov>
Subject: Please save our seashore! Reject the NPS plan!

Hi,

My name is Kathy Kimball. I am a lifelong Bay Area resident and have been visiting PRNS since the 1950s. It used to be lush and beautiful and now it is dry and dead due to ranching operations. I am sickened by the fact that ranchers have been allowed to continuously profit off of our public land, after being paid millions of dollars in the 1960s to leave. Our national park service should be protecting wildlife and the natural environment, not private interests. Their plan will kill native tule elk and put other endangered animals at risk. We have been turned away from the beaches before because they were so polluted with cow feces that it was dangerous and toxic! What about our marine life? What about the wildlife that have no where else to go? Cows, which don't belong there, can leave, but we need to protect our wildlife and environment. This decision will set a precedent, so, please do the right thing and let we the people know that California values conservation over private, right-wing lobbying ranching operations on OUR public land!

Thank you. Please do the right thing for our state, country and planet!

Best,

Kathy Kimball

Sent from my iPhone

From: Karmen <karmen.heaslip@gmail.com>

Sent: Thursday, December 17, 2020 3:57 PM

To: Coastal Point Reyes Management Plan <PointReyesManagementPlan@coastal.ca.gov>

Subject: Please reject NPS Amendment B to save our seashore!

Hello,

My name is Karmen Heaslip. I live 30 minutes away from PRNS, and spend quite a bit of my free time there. As a wildlife and nature lover, I am asking you to please reject Amendment B, which is inconsistent with the California Coastal Act and will put endemic Tule Elk and other wildlife at risk of extinction. I was shocked that, after reading the environmental impact report, PRNS would favor a plan that continues and expands ranching in our national park, and places importance on personal ranching profits over conservation, which is the whole point of a national park! Ranching pollutes our water and degrades our coastal prairie and soil. They have to shut down OUR public beaches because of pollution from cow feces. Yuck! The plan calls for culling of native Tule Elk to make more room for invasive species, such as cows, chickens and pigs! This is unacceptable! People go there to see the Tule Elk, not the cows! These ranchers should have been out decades ago, as they were paid millions to leave. Thanks to special lobbying interests and in recent years, Donald Trump, this has been allowed to go on, but it will not be swept under the rug. This whole situation is a disgrace and their plan should be rejected. People will not give up the fight for conservation and wildlife. Please, be on the right side of history.

Warm regards,

Karmen Heaslip
PO Box 81
Bolinas, CA 94924

From: Meg A. <mberlina@gmail.com>
Sent: Thursday, December 17, 2020 3:33 PM
To: Coastal Point Reyes Management Plan <PointReyesManagementPlan@coastal.ca.gov>
Cc: Weber, John@Coastal <john.weber@coastal.ca.gov>; Carey_feierabend@nps.gov;
Ryan_olah@few.gov; Craig_Kenkel@nps.gov
Subject: Protect Point Reyes and the Tule Elk

Hello CCC,

I write to you as a lifelong resident of Northern California.

Since I was a child, Point Reyes has been a place of refuge, escape and wonder to me and my family. In particular my father and I used to take long hikes marveling at the natural beauty and rugged coastline and I even remember the first time he showed me the Tule Elk.

I write to you as a mother myself. Please protect Point Reyes so that my kids and their kids can enjoy this special place, a place people come from all over the world to visit, catching glimpses of native species roaming the hills, wetlands teeming with birds and plants.

We don't need new cattle farming in Point Reyes, the current operations are stinky, polluting, eye sores. We don't want Tule Elk to be culled in preference for cows.

The Coastal Commission should be pushing for less fencing and barbed-wire and more access to beaches, less pollution from manure, less erosion and more protections for environmentally sensitive habitat, less development and more protection for coastal views and low-impact recreation.

Thanks for listening,
Megan Alderson

From: Peter Warner <phytopagan@sonic.net>

Sent: Thursday, December 17, 2020 3:19 PM

To: Weber, John@Coastal <john.weber@coastal.ca.gov>; Carey feierabend@nps.gov <Carey_feierabend@nps.gov>; Craig Kenkel@nps.gov <Craig_Kenkel@nps.gov>; Ryan olah@fws.gov <Ryan_olah@fws.gov>

Subject: Point Reyes National Seashore General Management Plan Amendment
California Coast Commissioners:

I write to oppose the "NPS preferred alternative" provided within the "General Management Plan Amendment: Final Environmental Impact Statement" developed by the National Park Service for Point Reyes National Seashore (PRNS). The lone acceptable alternative among the proposed alternatives is that of "no ranching."

The National Park Service has already reneged on its prior goals to develop an ecologically functional and sustainable management plan for PRNS, as well as to cease commercial ranching leases, and in doing so has violated prior agreements with local indigenous tribes, as well as the trust of park visitors. On this matter, area ranchers have collaborated in lying about "vacating the premises" and in gouging the public in order to retain their "rights" to make profits on the public dole.

As a federal taxpayer, I am unconditionally opposed to my tax dollars spent on subsidizing private industries, including ranching and dairy operations.

As a citizen, I call your attention to the hypocrisy and corruption demonstrated by California Congressman Jared Huffman and Senator Dianne Feinstein. These politicians have received considerable campaign financing from ranching and agricultural interests, and their voting records demonstrate that they are compromised professionally, legally, and ethically in failing to abstain from decisions that abet the causes of their donors. Despite their claims and those of NPS and ranching advocates, nothing in the preferred alternative will abet the mission of the National Park Service, nor will this desperate alternative do anything to salvage the ecologically devastating ranching industry.

As an ecologist, I am appalled that the National Park Service would concede wildlife habitat and its stated goals to manage public lands for environmental integrity and sustainability to private interests and destruction of public lands for profit. Livestock are primary contributors to atmospheric emissions, including methane, carbon dioxide, and sulfur dioxide, that contribute to ongoing human-influenced climate alterations. Livestock grazing at the intensities I've personally observed at Point Reyes National Seashore reduces plant diversity, and contributes high-nitrogen wastes and sediments to soils, streams, surface waters, and ground water.

The National Park Service has failed to provide sufficient range to tule elk at PRNS, and now resorts to an anti-ecological and inhumane, economically irresponsible proposal to exacerbate the very conditions that have led to high rates of elk mortality, and will legalize slaughter of these animals. Moreover, NPS dismisses climate change as a consideration in the development of its EIS alternatives -- a shockingly obtuse and ignorant position for an agency responsible for the management of millions of acres of public lands (to say nothing of wildlife habitat and entire ecosystems). The retention of an industry-beholden consultant (a company held criminally liable for defrauding the federal government in 2010 and 2015) to prepare the EIS says plenty about the disregard of the federal government and NPS for responsibility to the laws and citizens of this country.

The California Coastal Commission has a responsibility here to uphold the spirit and substance of the California Coastal Act in order to preserve the ecological integrity and aesthetic values of the California coast. I'll note the results with focused interest.

Sincerely,

Peter Warner Sebastopol, CA

From: Carol Drake <carolsgraphicarts@aol.com>

Sent: Thursday, December 17, 2020 3:14 PM

To: Weber, John@Coastal <john.weber@coastal.ca.gov>; Carey_feierabend@nps.gov; Coastal Point Reyes Management Plan <PointReyesManagementPlan@coastal.ca.gov>

Subject: Pointe Reyes Tule Elk

Dear Point Reyes Management Plan Commissioners,

The coastal access to Pointe Reyes is being blocked by hundreds of miles of cattle fencing, barbed-wire, and herds of cattle. There is so little access to the beaches, even though this is public land.

The water pollution is getting more severe, because of the cow manure.

Carbon farming” is dumping manure in different forms onto pastures and hoping most of it will sink into the soil. But a lot washes into streams with rain.

All this erosion and manure pollution is likely harming coastal marine life. This is not sustainable or furthering the mission of the Coastal Commission.

The bottom line is that the cattle herds are significantly impairing the natural resources in one of the most scenic parks, and a key part of the Miwok homeland, that is accessible to a large diversity of Bay Area visitors.

The Environmental Impact Statement (EIS) affirms that NPS intends to implement a plan that would expand ranching, allow commercial agricultural diversification, including row crops and more livestock, and extend grazing leases to 20 years. Tule elk could be shot if they entered the cattle pastures. The NPS is moving ahead with this plan despite the fact that more than [90% of the 7,627 public comments](#) received after the draft Environmental Impact Statement was released favored wildlife, recreation, and nature at the Seashore.

Thank you.

Carol Drake
Fremont, CA

From: Randy Johnson <rjohnson@getawayadventures.com>
Sent: Thursday, December 17, 2020 2:54 PM
To: Coastal Point Reyes Management Plan <PointReyesManagementPlan@coastal.ca.gov>
Cc: Weber, John@Coastal <john.weber@coastal.ca.gov>; Carey_feierabend@nps.gov;
Craig_Kenkel@nps.gov
Subject: Protect the Tule elk in Point Reyes National Seashore

To the California Coastal Commission,

You have before you what is probably one of the biggest environmental issues in a long time, involving a priceless slice of the California coast.

I am calling on you to protect the Tule elk population and stop the appalling idea of shooting wild Elk to protect the ranching industry that should not even be there in the first place.

On a recent visit to the Point Reyes National Seashore I came across large herds of cattle, miles of barbed wire, degraded streams, often with beach closures, putting Pt Reyes in the top 10 % of Crappiest places, in the US, limits on access and cow ranches that have clearly overstayed their welcome.

These issues fly into the core of what the mission of California Coastal Commission is all about; allow the natural beauty to survive and allow access to all not just the few profiteers.

I feel betrayed by the NPS for not upholding their duty to preserve, protect and make thrive a unique and important area of wild land held in the public trust.

Sincerely,

Randy Johnson

Randy Johnson

CEO

[Getaway Adventures](#) / [Wine Country Bikes](#) / [Sonoma On A Bike](#)

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December 16, 2020
 231 Roosevelt Way #1
 San Francisco, CA 94114

Dear California Coastal Commission,

I have lived in California since 1974. I have watched Californians fight for protecting our natural resources and vast beauty. Unfortunately, population growth and climate change have been trumping these efforts, making the protection of our parks even more urgent. The commission has an opportunity to help address protections of one of the state's natural wonders- Point Reyes National Seashore.

It seems that the National Park Service has been unable to protect these lands by itself. Political monies from the cattle industry have put influence on our politician and government agencies to protect the said "historical cattle ranches" within the park over the *natural resources* that are important for California to protect. The creation of Point Reyes National Seashore had the intention of restoring the last vast coastal plain. Californians have been waiting...

It is in your duty to protect coastal access, viewsheds, environmental resources, and much more. The Coastal Commission, as an entity, have done wonderful things for the people of California. Thank you. Point Reyes is possibly the largest project you have within your statutes to protect today. Now is the time to help complete our coastline protections, rather than allow for continued pollution and increases to the historical ranches.

I am a veterinarian and am not against cattle ranching. However, these ranches were paid large amounts of money to relocate. There were also given good leases to allow time for this move. Here we are many decades later, and this has not happened as was planned during the formation of PRNS. California is waiting for this dream. Their historic nature has been altered by corporate money and influence. They continue to pollute our natural resources. Our access to hiking the peninsula is hindered by barbed-wire fences. The coastal plain is cut up -preventing the natural usage for humans, animal and plants.

When you drive to Point Reyes lighthouse, many visitors are surprised to see the destruction created by the crowded cattle ranches. There is pollution, odors and large pools of manure. This empties into the rivers, streams and ocean affecting the wildlife and people. I was curious when I saw the large white plastic containers along the road but was **horrified** when I learned these are used to create veal by **containing** calves from movement. This is happening in the midst of this national resource. This is happing within sight of the sea.

I understand that the ranches want to expand by including chickens and pig farming. This will only lead to more pollution and destruction of the natural environment. It is time to severely limit these historic ranches or remove them completely as initially planned.

The next step is to force the NPS to do a proper environmental report, so that the entire PRNS can be re-evaluated for cattle ranching. This will give time for the next presidential administration to re-evaluate the future of all-natural resources within PRNS. Let's make California the leader again in environmental protections.

The Elk herds are also in danger. They once were plentiful in the area number in the thousands as first documented from Drakes diaries. Imagine a time, when they replenish the coastal plain once more, for all visitors to be in awe of the magic and wonder of nature. PRNS can become a world site for national and world restoration which would bring in tons of tourist dollars- outweighing the tax income from the ranches. I understand that they have a slim profit margin already and the NPS must spend money annually to maintain the ranches. The ranches also have a very low rent. Let's help these ranchers relocate.

Finally, the cattle industry is creating climate change with the increased methane production and destruction of the natural flora. Point Reyes can be a model for reconstruction

I know this is a difficult discussion, but each of you need to take a deep breath and do the right thing for California, all Californians, the environment and the World. Your decision will be the beginning of the healing that our society needs at this time of natural disaster and climate change. The California Coast Commission can lead California to the next phase of restoration. The National Park Service can then do the right thing by helping the ranches move permanently.

Thank you!

Ken Gorczyca, DVM

From: ann sandell <scs.co@att.net>
Sent: Thursday, December 17, 2020 1:20 PM
To: Coastal Point Reyes Management Plan <PointReyesManagementPlan@coastal.ca.gov>
Cc: Weber, John@Coastal <john.weber@coastal.ca.gov>; Carey_feierabend@nps.gov;
Craig_Kenkel@nps.gov; Ryan_olah@few.gov
Subject: Point Reyes National Seashore

Our family (and people we host in years when it is possible) visits The Point Reyes National Seashore year round to see wildlife such as the tule elk, elephant seals, whales, and coastal prairies with wildflowers. What we see are too many cattle, piles of manure, ugly barns, bare ground, and erosion, which can harm coastal marine life.

Even though this is public land our coastal access is being blocked by hundreds of miles of cattle fencing, barbed-wire, and herds of cattle, leaving little access to the beaches.

The historic character of the old farms adds little to the experience of visiting Point Reyes and the seashore is marred by new, modern industrial dairy barns that block vistas of the natural coast.

While we are lucky to have some rain these past days., the appalling treatment of the tule elk should not be allowed to continue. They should not be fenced in and should Never be kept from water sources to maintain their health and lives.

Tule elk in Point Reyes are more important than meat and dairy cows in that area. Period.

Thank you for your time in reading my letter.

Ann Bowers
San Rafael, CA

From: Jason Watkins <jwatkins@pixar.com>
Sent: Thursday, December 17, 2020 12:48 PM
To: Coastal Point Reyes Management Plan <PointReyesManagementPlan@coastal.ca.gov>
Cc: Weber, John@Coastal <john.weber@coastal.ca.gov>; Carey_feierabend@nps.gov;
Craig_Kenkel@nps.gov; Ryan_olah@few.gov
Subject: STOP Plan B!!!

Hello Coastal Commission,

I am disheartened and confused as to how the proposal to expand ranching in Point Reyes has gotten this far. I am writing to voice my absolute disapproval of this plan that puts business over nature.

Over ten years ago, my wife and I spent our honeymoon in and around Point Reyes. Hiking the trails and visiting the hidden beaches was supposed to be a beautiful experience, but it was overshadowed by the rancid cow manure runoff that was flooding into and contaminating the ocean. The realization that this happens every time it rains was disturbing. Furthermore, this destruction is hidden because it isn't witnessed by so many that visit the area to recreate in the warmer months.

So how is it possible that expanding ranching is being considered by people who are aware of this destruction? How is it possible that YOU are considering allowing more manure to pile up and contaminate our waters? If you have seen what I have, I'm guessing and hoping you wouldn't come close to considering this plan. This plan is embarrassing.

There are so many reasons why this is a horrible idea. I am highlighting only ONE of them. But what about beach access? What about protecting these sensitive habitats and the wetlands? What about the Tule Elk?! It makes no sense to expand the most environmentally destructive industry and harm this entire region.

Thank you for taking the time to consider my view. Please let me know if you have any questions and I am happy to discuss.

Jason Watkins
San Anselmo, CA

From: Hsiao Liu <hhliu12@yahoo.com>
Sent: Thursday, December 17, 2020 11:37 AM
To: Coastal Point Reyes Management Plan <PointReyesManagementPlan@coastal.ca.gov>
Cc: Weber, John@Coastal <john.weber@coastal.ca.gov>; Carey_feierabend@nps.gov;
Craig_Kenkel@nps.gov; Ryan_olah@few.gov
Subject: Request to please save the Tule Elk species and the future of Point Reyes!

Dear Point Reyes Mgmt Plan Team,

I am writing to plea that you would please fight against signing "Plan B" into law in January. I in opposition with expanding cattle farming in Point Reyes area because this action is slowly killing the Tule Elk population. These are precious creature that we should do all we can to help their survival on this land.

Please take this into consideration! We all need the beauty of nature and creatures during these times.

Thanks for your time and consideration.

Sincerely,
Hsiao Liu

From: JERRY POZO <jerrypoza@comcast.net>
Sent: Thursday, December 17, 2020 11:07 AM
To: Coastal Point Reyes Management Plan <PointReyesManagementPlan@coastal.ca.gov>
Cc: Weber, John@Coastal <john.weber@coastal.ca.gov>; Carey_feierabend@nps.gov;
Craig_Kenkel@nps.gov
Subject: Point Reyes GMPA

To Whom It May Concern,

When my wife and I moved to Sonoma County 3 years ago from the California Foothills, we expected to see wildlife, native tule elk, marine life, streams with potential indigenous fish, and flora & fauna of the coastal region.

Unfortunately, what we encountered on our first trip to Point Reyes National Seashore was lush coastal flora that turned into brown, cattle-laden hills, non-historic farms, erosion, plastic pens used to hold young animals, large & covered piles of manure, the stench of manure, vistas restricted by cattle fencing, barbed-wire and massive herds of cattle. We came within feet of cattle grazing, pooping and laying by the side of the road.

We were shocked that this was a National Seashore that should have protected native wildlife and groundcovers. While keeping out dairy cows and unsightly farms, barns, sheds and piles of manure. We also did not have the public right to access some of the coastal beaches.

I cannot tell you enough about how angry/upset this made us feel about the National Parks Department allowing this to happen, and today it keep happening.

I strongly suggest you reevaluate your position on this issue, regain National Land and put it to the highest use for people and families to visit and enjoy. Not just drive thru, sometimes stopping due to herds of cattle, with windows rolled up to mask the stinch of manure.

Shame on you for allowing this to happen! You are setting a low bar for National Parks, and demeaning the land you vow to protect.

Do the right thing now, and dismiss ranching from our National Seashore.

Place a priority on coastal recreation over development.

You owe it to protect this wonderful environmentally sensitive habitat and protect coastal views for generations to come.

Thank you.

Jerry + Diane Pozo
Sonoma County Residents

From: pat Cuiello <pcuvie@gmail.com>
Sent: Thursday, December 17, 2020 10:59 AM
To: Coastal Point Reyes Management Plan <PointReyesManagementPlan@coastal.ca.gov>
Cc: Weber, John@Coastal <john.weber@coastal.ca.gov>; Carey_feierabend@nps.gov;
Craig_Kenkel@nps.gov; Ryan_olah@few.gov
Subject: Point Reyes National Seashore's Consistency Determination

Dear Commissioners

When I travel to Point Reyes to enjoy the coast I find my coastal access blocked by hundreds of miles of cattle fencing, barbed-wire, and herds of cattle. There is very little access to the beaches, even though this is public land.

The cow manure not only stinks it is causing severe water pollution as it gets into the creeks. Sometimes the park service closes beaches because of manure pollution. I go to Point Reyes to enjoy the beauty of our coast and to see wildlife, native tule elk, elephant seals, whales, salmon runs, and lush coastal prairies with wildflowers. What I see are too many cattle, manure piles, ugly barns, bare degraded ground, and erosion. All this erosion and manure pollution is causing harm to the coastal marine life. This is not sustainable so it's not furthering the mission of the Coastal Commission: "to protect and enhance California's coast and ocean for present and future generations." The cattle farms not only do not enhance California's coast they degrade it, making protecting our coast impossible.

Please OBJECT to the Point Reyes National Seashore's Consistency Determination the National Park Service sent in, that claims their managing of ranches and elk is consistent with the California Coastal Zone Conservation Act.

Pat Cuiello
205 De Anza Blvd # 125
San Mateo, CA 94402

From: Amber Tysor <ac.cox@hotmail.com>

Sent: Wednesday, December 16, 2020 11:44 PM

To: Coastal Point Reyes Management Plan <PointReyesManagementPlan@coastal.ca.gov>

Subject: Protect Our “Protected” Land

California Coastal Commission,

I am appalled and absolutely devastated to hear of the plan intended to be carried out by the National Park Service in Point Reyes. I treasure our seashore and native wildlife, and growing up in Marin I loved hearing of the conservation success story of the tule elk. I frequent this area to whale watch, but watching the land decay and become nothing but cow feces breaks my heart. Piles of tires and desolate monotone landscape filled with cattle is what is occupying the area that native fauna and flora once thrived. The cows have eaten and trampled the land into an absolute wasteland. The cow feces and urine has contaminated the water sources that our coho salmon, tule elk, and even grey whales depend on for survival. Why aren't these things being taken into account when moving forward with this plan? These ranchers all have operations outside of Point Reyes, and they were already paid to leave, so why are we choosing a plan that not only favors them, but is also the most destructive to our National Park? Public favor clearly opposes this decision and it is very obvious that the land and wildlife are suffering. This is supposed to be protected land. Please protect it.

Amber Tysor
Richmond, CA
520-465-4431

From: Arnold Erickson <Erickson18@comcast.net>

Sent: Wednesday, December 16, 2020 10:29 PM

To: Coastal Point Reyes Management Plan <PointReyesManagementPlan@coastal.ca.gov>

Subject: Point Reyes Comment

I write to urge that the Commission reject plans to expand private ranching in the Point Reyes National Seashore. The issue is in part about whether the National Park Service should cull elk, but it extends to the important considerations of public access and environmental protection. These factors are fully within the Commission's purview under the Coastal Zone Management Act.

When I visit Point Reyes, I am struck by how much of the coastal public lands are behind barbed wire. I drive by and look at how ranching has limited access to the area - leaving barren land and manure. The ranchlands should be restored as natural coastal prairies that would provide the chance to experience this land as it was before it was settled. (See Management Act, Ch. 3, art. 2.)

One of the arguments I hear is about the importance of the historical ranches, yet the ranches today bear no resemblance to this history. The old Pierce Point Ranch that the NPS maintains preserves the historical context. The private ranches obscure that legacy and actually keep the public from accessing the more important story of the land itself.

The Commission is also concerned with protecting water quality and environmentally sensitive habitat. (Management Act, Ch. 3, arts. 4, 5.)

Water pollution is a severe problem due to fecal contamination with levels reaching far beyond what is safe for both marine and land-based wildlife. The disruption to the environment increases the risk to endangered species, such as the Snowy Plover. Erosion from cattle is evident.

The cattle today outnumber the Tule Elk, which is a species only found in California. Elk have died during droughts. Their habitat, along with that of other wildlife, is not adequately protected under the NPS plans.

We go to Point Reyes to enjoy the coastal views. (Management Act, Ch. 3, art. 6.). The private ranches operating on public land are detrimental to this experience. The difference between the ranches and the Tule Elk preserve are striking, yet it is all public land that should be protected. Point Reyes has an important opportunity to teach future generations about coastal wildlife and ecology. I urge the Commission to take this responsibility seriously and protect public land on the California coast.

Arnold Erickson
85 Taylor Dr.
Fairfax, CA. 94930

Erickson18@comcast.net

From: Michael Chatham <mchatham28@gmail.com>

Sent: Wednesday, December 16, 2020 8:29 PM

To: Coastal Point Reyes Management Plan <PointReyesManagementPlan@coastal.ca.gov>

Subject: Point Reyes Wildlife and Ranches

To Whom It May Concern,

Regarding all the management plans for Point Reyes National Seashore, whether they be short-term or long-term, mere proposals or concrete action plans; I sincerely hope that the National Park Service will prioritize the well-being on the indigenous wildlife, over the interests of local ranchers.

It should go without saying: the NPS's primary role/commitment should be to protect green spaces, not facilitate private industry.

Your ultimate alliegence should be with Mother Nature, and any deviation from this is antithetical to the entire purpose of your department.

Thank you for your time.

Sincerely,
Michael Chatham

From: N M <nancycmcdonald@gmail.com>
Sent: Wednesday, December 16, 2020 7:12:22 PM
To: Coastal Point Reyes Management Plan <PointReyesManagementPlan@coastal.ca.gov>
Cc: Weber, John@Coastal <john.weber@coastal.ca.gov>; [Carey feierabend@nps.gov](mailto:Carey_feierabend@nps.gov) <[Carey feierabend@nps.gov](mailto:Carey_feierabend@nps.gov)>; [Craig Kenkel@nps.gov](mailto:Craig_Kenkel@nps.gov) <[Craig Kenkel@nps.gov](mailto:Craig_Kenkel@nps.gov)>; [Ryan olah@few.gov](mailto:Ryan_olah@few.gov) <[Ryan olah@few.gov](mailto:Ryan_olah@few.gov)>
Subject: Point Reyes National Seashore Management Plan

Good morning,

I moved to California from New England seven years ago when I retired and have enjoyed the vast public lands within the boundaries of my adopted state, hiking daily, camping, tide pooling, wildlife and wildflower identification, kayaking, biking and visiting historic sites. Every time I drive from Santa Rosa to hiking trails and beaches within the Point Reyes National Seashore my excitement turns to sadness and despair at the devastation of the native flora and fauna due to cattle ranching and dairy farming. The same is true when driving to the other side of Tomales Bay with the added eyesore and heartbreak of chicken warehouses and veal calf igloos. I was horrified while kayaking on the Russian River in Jenner to see cattle wading into the river and defecating directly into it. My impression of California before moving here was that it is a state that more actively protects the environment than others. But the agriculture lobby is more influential than I expected.

The prioritization of cattle and dairy cows over the native tule elk herd, fenced away from water sources, dying of thirst and culled to benefit ranching is wrong. The park should be moving in the opposite direction, restoring native species, returning the land to its natural state.

As I understand the history of the National Park Service agreement when they bought the ranch land for \$57M in the 1970s, the land was to be restored to native flora and fauna before the year 2000. I encourage you to deny the permit to expand agricultural uses of land within the national seashore and abide by the mission statement of the NPS to preserve unimpaired the natural and cultural resources and values of the National Park System for the enjoyment, education, and inspiration of this and future generations.

Thank you.

Nancy McDonald
 Santa Rosa

From: Holly Ashton <hollyashton@live.com>
Sent: Wednesday, December 16, 2020 6:21 PM
To: Coastal Point Reyes Management Plan <PointReyesManagementPlan@coastal.ca.gov>
Cc: Weber, John@Coastal <john.weber@coastal.ca.gov>; [Carey feierabend@nps.gov](mailto:Carey_feierabend@nps.gov) <[Carey feierabend@nps.gov](mailto:Carey_feierabend@nps.gov)>; [Craig Kenkel@nps.gov](mailto:Craig_Kenkel@nps.gov) <[Craig Kenkel@nps.gov](mailto:Craig_Kenkel@nps.gov)>; [Ryan olah@few.gov](mailto:Ryan_olah@few.gov) <[Ryan olah@few.gov](mailto:Ryan_olah@few.gov)>
Subject: Point Reyes

To Whom It May Concern,

I went out to Point Reyes last Monday to enjoy the wildlife. What I saw was lots of cows which I see wherever I go during my daily life in Sonoma County. I definitely did not feel like I was in a National Park. The same sights(cows, barbed wire fences, bare ground and manure), sounds(cows and farm equipment) and smells(manure) that I encounter when I am at home. I was hoping to see the Tule Elk which I had heard so much about but to find them I had to drive past all the cows and ugly landscape of unattractive farms, manure piles and bare dirt. When I finally spotted a herd, they were behind a barbed wire fence and there was nowhere to park and observe them. I was very disappointed. All of the ground erosion and manure pollution must be harming the wildlife at Point Reyes both plants and animals including the coastal marine life. This is not furthering the mission of the Coastal Commission.

Thank You,
Holly Ashton

From: Michelle Sahlin <michellesahlin@yahoo.com>
Sent: Wednesday, December 16, 2020 6:14 PM
To: Coastal Point Reyes Management Plan <PointReyesManagementPlan@coastal.ca.gov>
Cc: Weber, John@Coastal <john.weber@coastal.ca.gov>; [Carey feierabend@nps.gov](mailto:Carey_feierabend@nps.gov) <[Carey feierabend@nps.gov](mailto:Carey_feierabend@nps.gov)>; [Craig Kenkel@nps.gov](mailto:Craig_Kenkel@nps.gov) <[Craig Kenkel@nps.gov](mailto:Craig_Kenkel@nps.gov)>; [Ryan olah@few.gov](mailto:Ryan_olah@few.gov) <[Ryan olah@few.gov](mailto:Ryan_olah@few.gov)>
Subject: Point Reyes Tule Elk

To the California Coastal Commission,

Please reconsider signing your Plan B into law regarding the Tule Elk at Point Reyes National Park.

Extended farming/ranching land will impede the grazing land of the Tule Elk and ultimately cause more environmental destruction of the park's grasslands and wetlands as well as threatening the water quality from livestock runoff.

Shouldn't the well-being of the native Tule Elk that we fought to save have precedence over expanding un-needed farmland? Visitors come to this National Park to see wildlife and nature, not farms and cattle.

Please re-consider putting our already dire environment at the forefront of your plans. Thank you for your time.

- Michelle Docter

From: Emily Gallagher <echarlesgal@gmail.com>

Sent: Wednesday, December 16, 2020 5:48 PM

To: Coastal Point Reyes Management Plan <PointReyesManagementPlan@coastal.ca.gov>

Subject: John.Weber@coastal.ca.gov, Carey_feierabend@nps.gov, Craig_Kenkel@nps.gov and Ryan_olah@few.gov

Hello,

Please see attached comment regarding the Point Reyes Management Plan.

Thank you. Emily Gallagher

TO: California Coastal Commissioner

Re: NPS proposed management plan for Point Reyes National Seashore

As a visitor to Point Reyes National Seashore, I am deeply concerned about the National Park Service's proposed plan for managing point Reyes National Seashore. The cattle ranching currently happening at the Seashore is interfering with my ability to enjoy this coastal area in the following ways:

1. It interferes with my access to the Seashore. There are a very limited number of places to access the seashore because much of the area is fenced off for cattle. Additionally, runoff from the cattle ranches poison the water, causing the few public spaces available to be closed periodically. This is unacceptable, and no effort on the part of ranchers will fix this. The NPS's management plan would make the situation even worse by allowing even more ranching and the addition of other animal agriculture.

2. It interferes with my ability to engage in coastal dependent recreation. Because so much of the land is fenced off for cattle ranching, it makes it more difficult for me to see the rare species that exist only, or nearly only, at the Seashore, such as rare frogs and the amazing Tule Elk. One of the main draws of visiting Point Reyes is the diversity of both plants and animals, and the dairy operations are destroying this fragile ecosystem. The NPS's management plan would see this destruction accelerated by expanding agricultural activity and actively killing the Tule Elk.

3. It fails to protect coastal views. I come to the seashore to see herds of Tule Elk dotting old-growth grasslands with ocean in the distance. Instead, I see plastic veal crates, miles of fencing, manure, old tires and tarps, and massive dairy structures. This obstructed coastal view is nothing like the view visitors had in the 18 and 1900s when these were small, hand-milking dairies. If I wanted to see functioning agricultural operations all I have to do is drive down I5. I come to Point Reyes for nature.

The National Park Service is failing to appropriately manage the Seashore and their latest management plan proposes to make the situation even worse. They ignored their own science and thousands of public comments including my own. I recognize that it is difficult to stand up and make the hard decision to phase out the dairies which have been in operation for decades. But this is what is necessary for the Seashore. The Coastal Commissioners must be the ones to stand up and take the brave step of properly enforcing the clear laws that protect this area. Please do not approve the NPS's management plan (alternative B) and instead insist they do additional testing and anything else you can to move them towards alternative F. If you consider yourself a protector and steward of the land, please do what you know is right for the generations of Californians to come.

Thank you

Emily Gallagher

From: **PnB Bonfilio-Lyon** <rednpeanut@gmail.com>

Date: Wed, Dec 16, 2020 at 5:08 PM

Subject: Save the Tule Elk at Point Reyes!

To: <PointReyesManagementPlan@coastal.ca.gov>

Cc: <john.weber@coastal.c.gov>, <Carey_feierabend@nps.gov>, <Craig_Kenkel@nps.gov>, <Ryan_olah@few.gov>, PnB Bonfilio-Lyon <rednpeanut@gmail.com>

I was raised in Marin, and the coast and surrounding hills have been a source of joy for me for all these years.

I am appalled to see what is happening to the Tule Elk. All for the sake of a small portion of the farming community in Marin?

I have been a long time supporter of MALT, but this year, my donations end. Until this cruelty is reversed, I will no longer be a supporter.

Fencing out these defenseless, native animals, cutting them off from much needed food and water, is horrendous. This caused many of them to die this year due to starvation and dehydration.

Please stop this practice and save these native herds.

Thanks for listening,

Patty Bonfilio

From: Dana Frankoff <dfrankoff@pixar.com>
Sent: Wednesday, December 16, 2020 4:49 PM
To: Coastal Point Reyes Management Plan <PointReyesManagementPlan@coastal.ca.gov>
Cc: Weber, John@Coastal <john.weber@coastal.ca.gov>; [Carey feierabend@nps.gov](mailto:Carey_feierabend@nps.gov) <[Carey feierabend@nps.gov](mailto:Carey_feierabend@nps.gov)>; [Craig Kenkel@nps.gov](mailto:Craig_Kenkel@nps.gov) <[Craig Kenkel@nps.gov](mailto:Craig_Kenkel@nps.gov)>; [Ryan olah@few.gov](mailto:Ryan_olah@few.gov) <[Ryan olah@few.gov](mailto:Ryan_olah@few.gov)>
Subject: Please Save the Elk in Point Reyes

To Whom it May Concern,

It would be TRULY devastating to loose the Elk in Point Reyes. Please put your effort towards making sure this doesn't happen.

Point Reyes is one of the last places and the only place I've ever seen elk roaming freely. They offer so much to that area for people of all ages to see how humans can beautifully exist with wildlife.

So much of what surrounds that area is filled with cows manure stink not to mention it's doing horrible things to our environment but you already know that.

I make short documentaries about protecting our oceans and this is SUCH a harm to marine life.

Thanks for helping our environment thrive instead of taking away the little wildlife we have left.
Dana

From: Alli S <alli.sadegiani@gmail.com>
Sent: Wednesday, December 16, 2020 4:36 PM
To: Coastal Point Reyes Management Plan <PointReyesManagementPlan@coastal.ca.gov>
Cc: Weber, John@Coastal <john.weber@coastal.ca.gov>; [Carey feierabend@nps.gov](mailto:Carey_feierabend@nps.gov) <[Carey feierabend@nps.gov](mailto:Carey_feierabend@nps.gov)>; [Craig Kenkel@nps.gov](mailto:Craig_Kenkel@nps.gov) <[Craig Kenkel@nps.gov](mailto:Craig_Kenkel@nps.gov)>; [Ryan olah@few.gov](mailto:Ryan_olah@few.gov) <[Ryan olah@few.gov](mailto:Ryan_olah@few.gov)>
Subject: Tule Elk and Point Reyes Nation Park

To whom it may concern,

This is regarding the devastating planned cattle operation on Point Reyes that is putting this unique habitat at great risk.

I came to see wildlife, native tule elk, elephant seals, whales, salmon runs, and lush coastal prairies with wildflowers. What I see are too many cattle, manure piles, ugly barns, bare ground, and erosion. All this erosion and manure pollution is likely harming coastal marine life. This is not sustainable or furthering the mission of the Coastal Commission.

Please consider cancelling this project. We are losing the natural world around us more and more everyday.

Thank you
A.

From: Jocelyn Knight <jocelynknight.photo@gmail.com>
Sent: Wednesday, December 16, 2020 3:34 PM
To: Coastal Point Reyes Management Plan <PointReyesManagementPlan@coastal.ca.gov>
Subject: Pt. Reyes National Seashore

For the California Coastal Commission's January 2021 Meeting
 Re: Comments on the Consistency Determination for the National Park Service Point Reyes National Seashore 2020 General Management Plan Amendments.

Jocelyn Knight, Corte Madera, CA December 7, 2020
 Martin Griffin Jr. M.D. MPH, Belvedere, CA December 7, 2020

According to the proposed General Management Plan Amendment, the preferred Alternative B will most certainly exacerbate the current problems with pollution, wildlife habitat loss, biodiversity of species loss, and loss of recreational opportunities for the public and the health and survival of the natural landscape.

INCONSISTENCIES with The California Coastal Act:

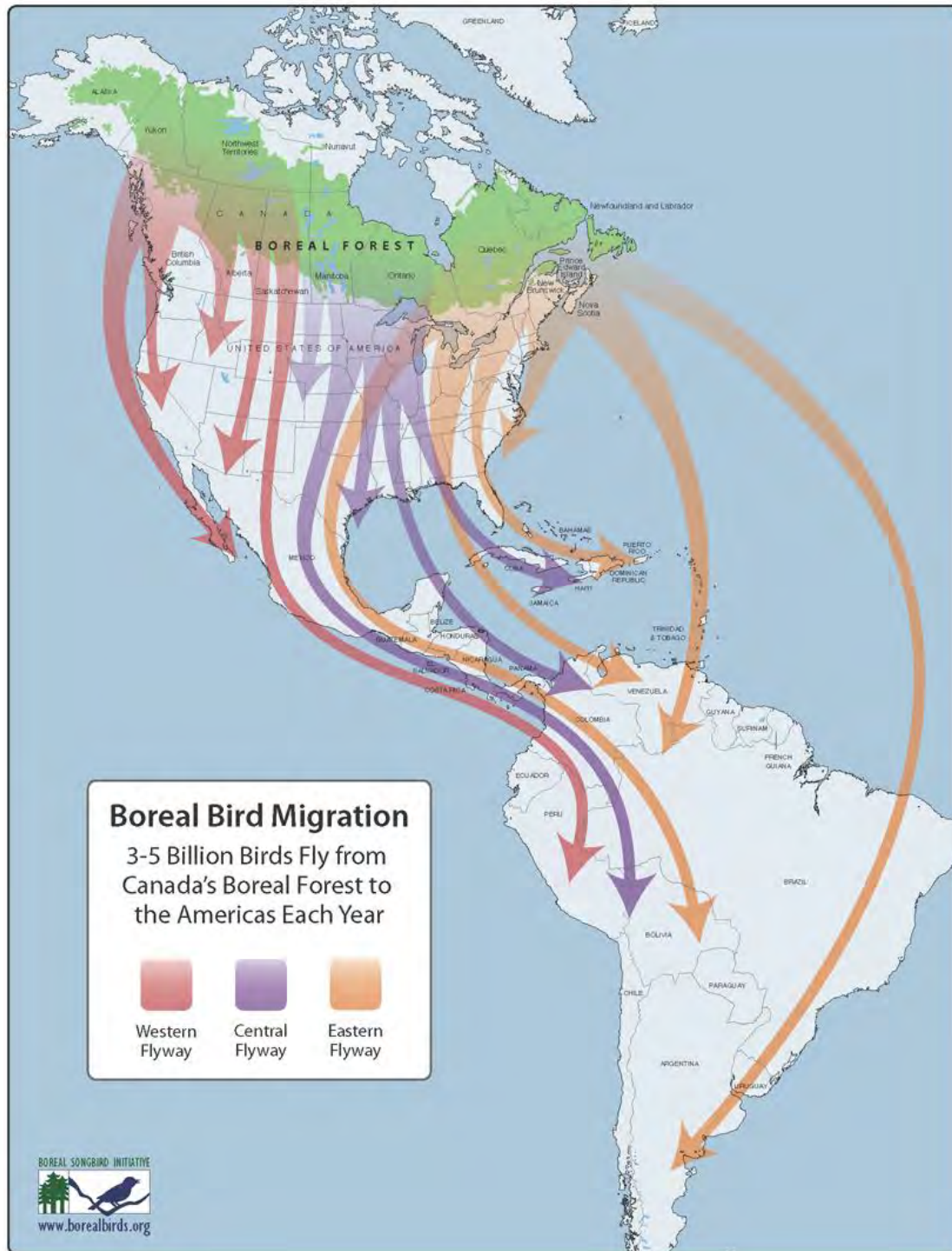
1. The giant new roadway improvements on Sir Francis Drake Boulevard increases road-kill of native animals and is inconsistent with protection of wildlife. It seems it was built to accommodate the large industrial trucks for hay, milk, and livestock.
2. Cattle operations divert and pump water from natural springs and leave none for wildlife, inconsistent with the preservation of native species in a National Park.
3. Denudation of the landscape by grazing cattle eliminates cover and forage for migrating birds and other animals. This includes Red-legged Frog Critical Habitat, Tule Elk, Pt. Reyes Mountain Beaver and Pt. Reyes Jumping Mouse.
4. Scenic views are scarred with barren, compacted lands devoid of natural vegetation and filled with industrial machinery and barns, and mountains of manure because of cattle grazing and silage operations.
5. Silage operations kill nesting songbirds and encourage raven populations that further harm populations of the Endangered Snowy Plover and other migratory birds. Native plants are eliminated from the area with bulldozers.
6. Hundreds of miles of barbed wire fences continuously surround the cattle pastures from Pierce Point all the way to the Lighthouse, and block migration paths for endemic tule elk, and is inconsistent with protection of wildlife .
7. With Dairy Conditional Waivers, extreme amounts of cattle manure continue to pollute the landscape with both liquid fecal matter spread by trucks over silage areas and huge manure piles on the land. Every cattle operation on the Peninsula ultimately drains into either the Abbott's Lagoon, Drakes Estero or other tributaries and finally the Pacific Ocean. This impairs the marine life as well as prevents native grasses and plants from surviving.
8. Extreme amounts of nitrogen from the fecal matter in the water affects marine life, and marine plants, especially eel grass, needed by migrating black brant geese to survive their migration from Alaska to Baja.
9. Native grasses and forbs have been practically eliminated by the non-native European grasses brought to the area by the cattle operations. Without native plants, birds and other wildlife have no food or cover from predators.

10. Rusted out cars and trucks, hundreds of used tires in giant piles, condemned buildings long boarded up and other garbage left behind from the ranchers further pollutes the landscape and eliminates wildlife protections and recreational enjoyment.
11. Carbon sequestration in native bunch grasses has been virtually eliminated by the non-native grasses brought with the cattle feed.
12. Access is prevented by barbed wire fencing along every inch of Sir Francis Drake Blvd. discourages hikers, birders, photographers and nature lovers from being on the landscape, inconsistent with recreation in a National Park.
13. Noise pollution from the dairy operations and pumps and generators is inconsistent with a National Park.
14. Domestic cats on the ranches kill wild birds.
15. Domestic dogs cause noise and chase and kill wildlife and should not be allowed in a National Park.
16. Light pollution from all the Ranches and residential housing associated with the ranches affects migrating birds at night. This is inconsistent with preserving natural habitat.
17. Ranching has replaced the natural Coastal Prairie habitat necessary for wildlife and migratory birds. Inconsistent with The Coastal Act policies (Division 20 of the Public Resources Code) require **“terrestrial and marine habitat protection..”**
18. All the ranching in the Pt. Reyes National Seashore effectively blocks the migration of birds and tule elk, pollutes the shores where Elephant Seals and Harbor seals come to rest and birth their young, ravens and other non-native invasive birds attack the endangered snowy plover and other songbirds, all inconsistent with the preservation of wildlife.

Alternative B is only good for the ranchers who should have left the area several decades ago, as per the original agreement when the Pt. Reyes National Seashore was created. If this path is taken, our National Park will be lost forever under the control of roughly 5 ranching families who continue to take the Park as their own, leaving nothing for the public but fences and manure. Alternative F is the only way that we can restore our natural resources and give nature an opportunity to thrive in our National Seashore for future generations to come. We find that ranching within the Pt. Reyes National Park **INCONSISTENT** with the intent of a National Park, and the Coastal Act.

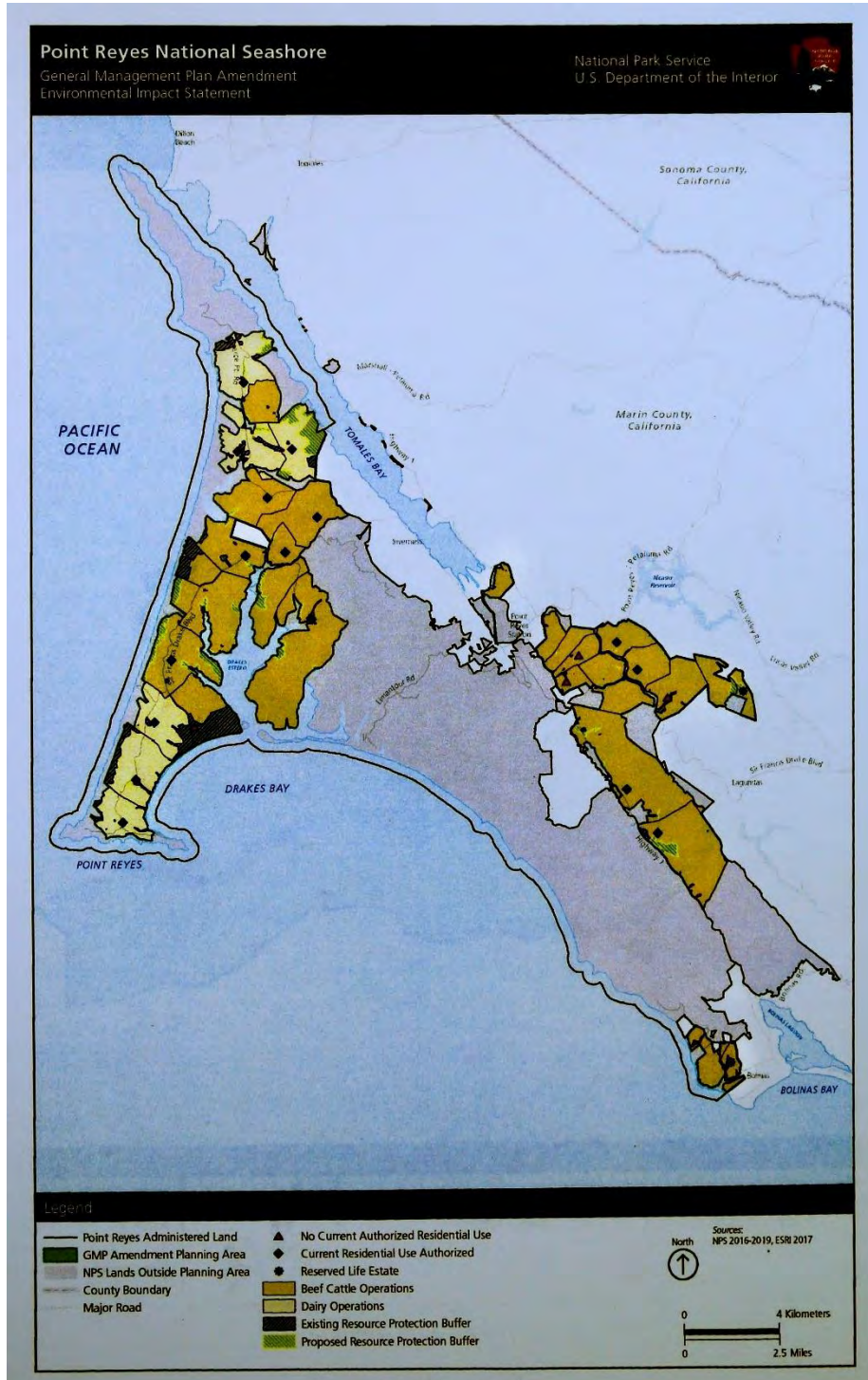
Our Qualifications:

Dr. Griffin has a Bachelor of Arts Degree in Zoology and Botany, an M.D. from Stanford School of Medicine, and a Masters Degree in Public Health from UC Berkeley. He is the author of Saving the Marin -Sonoma Coast, that includes battles to save Pt. Reyes, Bolinas Lagoon, Tomales Bay and the Russian River. Dr. Griffin is a Founder of Audubon Canyon Ranch and has dedicated his life toward environmental protection. Jocelyn Knight is a Naturalist, an Audubon Canyon Ranch Docent, a graduate of the Environmental Forum of Marin, and a lifelong photojournalist who has had the privilege of working with Dr. Griffin for several years.



Pt. Reyes is the crossroads of major habitats and flyways from Alaska to Baja. There used to be 425 species of birds that depended on Pt. Reyes. These flyways are blocked by ranch buildings, fences and operations 24 hours a day. Speeds on the new enlarged service road, Sir Francis Drake, will increase wildlife roadkills, elk migrations from Pierce Point to Chimney Rock are blocked by these huge ranch operations. Access to Drake's Estero, Abbott's Lagoon and other

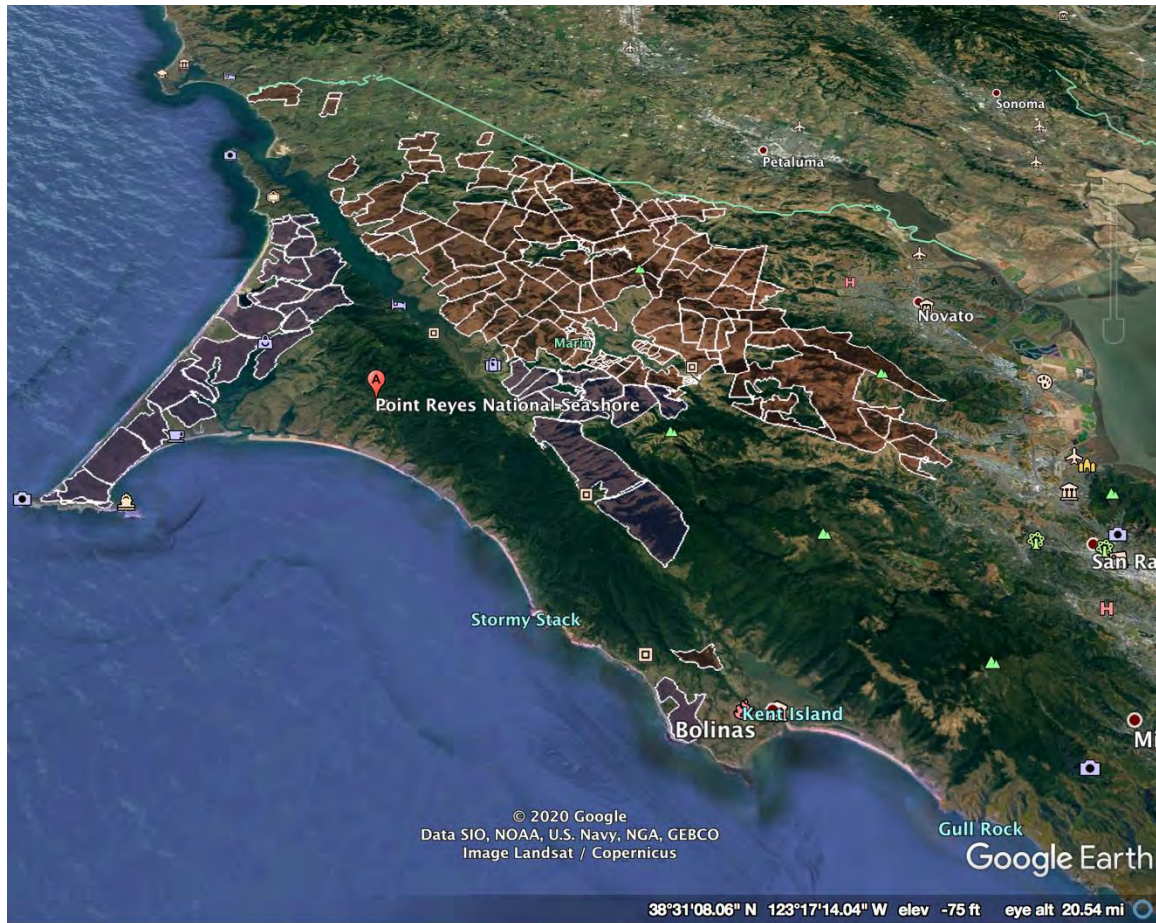
waterways for wildlife in the Coastal corridor must be restored. All the current ranch operations must all be removed to restore Pt. Reyes as the GEM of the Pacific Flyway.



. The heart of the migration pathway is bereft of any benefits for wildlife. The Coastal Prairie has been hammered for over 150 years of overgrazing. The manure runs into the ocean or Drake's Bay. There are 16 ranches with 6000 head of cattle with barb-wire fencing on one of the most dramatic coastal landscapes of the world.

The east shore of Tomales Bay has been captured by numerous private ranches to which there is no public access. On 26,000 acres of public land on the west side of Tomales Bay, Pt. Reyes has been heavily overgrazed for 150 years and is in desperate need of the complete removal of cattle to restore the Coastal Prairie.

It is obvious from this map that all migratory flyways and pasture and water access for wildlife are blocked or captured by these ranchers.



From: Nickolaus Sackett <nick@socialcompassion.org>
Sent: Wednesday, December 16, 2020 3:16 PM
To: Coastal Point Reyes Management Plan <PointReyesManagementPlan@coastal.ca.gov>
Subject: REJECT the NPS Recommended Management Plan

To whom it may concern:

On behalf of Social Compassion in Legislation, we oppose the National Park Service's final General Management Plan Amendment (GMPA) for the Point Reyes National Seashore.

Before moving forward with Alternative B, which will ruin the Seashore with continued and expanded cattle grazing and the growth of other private, for-profit businesses at taxpayer expense, I urge you to pursue further inquiry, including long overdue water quality tests and a Supplemental Environmental Impact Statement (SEIS) on drought and wildfires.

Tourism is the primary source of income at the Seashore. Cattle are the Seashore's primary source of greenhouse gases which contribute to climate change. Private ranching at the Seashore has resulted in overgrazing, water pollution, invasive weeds, and the reduction of native species, including those protected under the Endangered Species Act.

Water quality degradation occurs from ranching practices like spreading liquid manure on fields, which increase human health risks, kill native fish, and pollute waterways. I implore you to conduct a Federal Consistency Review to address the lack of water quality testing, known environmental degradation, and impacts on migratory birds and endangered species at the Seashore.

A SEIS on the GMPA concerning the Woodward Fire would determine new impacts on free-roaming elk. The impacts of ranchers growing crops and raising sheep, goats, pigs, turkeys or chickens, which increase conflicts with wild animals, must also be assessed.

We also urge you to investigate the mass die-off of Tule elk who are fenced into a "preserve" — which is in violation of the Organic Act 1916 — without any perennial stream to serve fresh water. Please act urgently to ensure the NPS upholds its duty before any more of these rare native animals die.

Alternative B must not be finalized until all these steps above are taken, and the public's concern for the future of this natural treasure and the wild animals who call it home is acknowledged.

Regards,

Nickolaus Sackett | Director of Legislative Affairs

Social Compassion in Legislation | www.socialcompassioninlegislation.org

C 415-238-3179 | nick@socialcompassion.org

From: Lisa Stanziano <lisa.stanziano@gmail.com>
Sent: Wednesday, December 16, 2020 10:25 AM
To: Coastal Point Reyes Management Plan <PointReyesManagementPlan@coastal.ca.gov>
Subject: NPS's chosen plan B is NOT consistent with the CA Coastal Act

Dear Members of the California Coastal Commission,

The last time I took an out of town visitor to see the Tule elk at Point Reyes, I was appalled and embarrassed. To get to the Pierce Point elk reserve one drives through miles and miles of barren, overgrazed hills. And the stench was so bad we had to keep the windows closed and recirculate the air in the car. Eventually we saw the amazing elk. We also saw barbed wire fences, large modern dairy barns, signs that prohibited trail access, and unsettling enclosures with baby cows in a field. My friends couldn't believe this was a California public park ("California is usually so environmentally progressive."

I'm not a scientist but I can see (and smell) that the National Park Service is not managing this beautiful coastal park in a healthy way. The coastal views are NOT consistent with Coastal Act, Article 6. Access to beaches and trails is blocked, which is not consistent with Article 2. Even more disturbing is the information documented in the NPS's own EIS report that e-coli bacteria levels have tested beyond legal limits, and haven't even been measured in 7 years. The manure runoff into the creeks and streams, and into the Pacific Ocean is not consistent with Article 4 of the Coastal Act, which addresses water quality issues. This is a public health hazard as well as dangerous to the local marine ecosystems.

The NPS report card for supporting the Coastal Act is grim. I implore you to help hold the NPS accountable. By law, the National Park Service is mandated to manage all national parks in a manner that provides maximum protection, restoration, and preservation of the natural environment for generations to come. The NPS can take this opportunity to do the right thing and so can the Coastal Commission: by standing up for the Coastal Act.

While Management Plan F (phasing out ranching) is the only plan that fulfills the mandate for a healthy park and coast, the NPS preferred Plan B is surely the worst plan. Plan B would not only continue the current damaging ranch practices but introduce other livestock, row crops, and businesses like B&Bs, all of which would be even more detrimental to the fragile ecosystems in the park, especially in regard to water issues, not to mention the killing of "nuisance elk."

Please help save our Point Reyes National Seashore by holding the NPS accountable.

Sincerely,
 Lisa Stanziano
 San Francisco, CA

- Allow around 28,000 acres in PRNS and Golden Gate National Recreation Area (GGNRA) to be severely diminished pasture zones instead of restored and protected varied dynamic habitat types.
- Increase the acres devoted to agriculture in the park by 7,600 acres.
- Increase the variety of non-native domesticated animals while putting pressure on the native species that have no other sanctuary to go to.
- Allow multiple acres of row crops that will undoubtedly lead to conflicts with yet more native species and natural resources.
- Allow the killing of another rare and native species, the Tule elk, so as to promote more non-native domesticated cattle, goats, pigs, sheep, chickens, etc.
- Further impact native species like endangered Snowy Plovers, endangered Coho Salmon, endangered California Red-legged Frogs, threatened Burrowing Owls, and Western Pond Turtles to name a few. There are far more species impacted by this plan.
- Further diminish endangered California Coastal Prairie habitat - the most species rich grassland type in North America. There is less than 2% of this habitat type left on Earth.
- Further impact soil fertility, dune ecosystems, riparian corridors, and other habitat types.
- Further increase waste runoff and soil erosion issues.
- Further impact and diminish water quality including natural springs, streams, seeps, ponds, wetlands, marshes, Tomales Bay, and the Pacific Ocean.
- Further impact and diminish marine life and the wildlife that rely on healthy marine ecosystems - from the tiniest aquatic microorganisms and invertebrates to larger warm blooded mammals and bird species both migratory and resident.
- Allow the expansion of completely unnatural and unsightly fencing that further hinders and endangers not just native wildlife but park visitors (believe me I know). This plan will increase the amount of barbed wire and electrical fencing which will in turn limit public access, diminish scenic views, and threaten the health & well being of countless native fauna.
- Further diminish scenic stretches of ideal native habitats that promote natural resources and native biodiversity. This region is supposed to be a biodiversity hotspot, not an overgrazed wasteland of liquified manure and introduced flora or an endless expanse of row crops.
- Further exacerbate greenhouse gas emissions at a time of Climate Crisis.
- Further exacerbate a major pollution problem from cattle and even increase public health risks and concerns associated with diseases from cattle like Johne's disease. This disease was also passed on to native Tule elk from cattle.
- Further strain park resources including labor as well as the budget. Ranch operations require ongoing park maintenance, personnel, and monetary resources. One might think that the leaseholders are required to provide upkeep to properties they lease, but this is just theory and far from practice as park employees are the ones you often see doing maintenance work that they shouldn't be or need to do.
- Further prop up an industry that is declining and needs government subsidies to compete.

- Further add to the existing 5,125,000 non-native cattle already operating throughout California and the more than 94 million cattle operating throughout the United States.
- Further contribute to the overwhelming amount of land already set aside for agriculture interests elsewhere in Marin County specifically. There are vast expanses of agriculture operations currently operating all along the coast, but there is only one National Seashore.
- Further diminish opportunities for scientific research and study of California's natural heritage and resources.
- Allow retail, animal butchering and processing as well as small factories and private tours and accommodations.

This is just a portion of a long list of negative impacts, concerns, and problems associated with the proposed NPS plan, which at its core is a disaster for the future of Point Reyes National Seashore and this precious stretch of California Coastline. It is quite clear that the NPS GMP amendments conflict with specific sections of the California Coastal Act in a number of ways (here are some examples):

- Article 4, Marine Environment, Sec. 30230(a) "Marine resources shall be maintained, enhanced, and where feasible, restored. Special protection shall be given to areas and species of special biological or economic significance. Uses of the marine environment shall be carried out in a manner that will sustain the biological productivity of coastal waters and that will maintain healthy populations of all species of marine organisms adequate for long-term commercial, recreational, scientific, and educational purposes.
- Article 5, Land Resources, Sec. 30240(a) "Environmentally sensitive habitat areas shall be protected against any significant disruption of habitat values."
- Article 5, Land Resources, Sec. 30243 "The long-term productivity of soils...shall be protected..."
- Article 4, Marine Environment, Sec. 30230(d) "Use of marine environment shall be carried out in a manner that will sustain the biological productivity of coastal waters and that will maintain healthy populations of all species of marine organisms adequate for long-term commercial, recreational, scientific, and education purposes."
- Article 4, Marine Environment, Sec. 30231 "The biological productivity and the quality of coastal waters, streams, wetlands, estuaries, and lakes appropriate to maintain optimum populations of marine organisms and for the protection of human health shall be maintained and, where feasible, restored through, among other means, minimizing adverse effects of waste water discharges and entrainment, controlling runoff, preventing depletion of ground water supplies and substantial interference with surface waterflow, encouraging waste water reclamation, maintaining natural vegetation buffer areas that protect riparian habitats, and minimizing alteration of natural streams.
- Article 2, Public Access, Sec. 30210 "[...] maximum access, which shall be conspicuously posted, and recreational opportunities shall be provided for all the people consistent with

public safety needs and the need to protect public rights, rights of private property owners, and natural resource areas from overuse.”

***THERE IS NO PRIVATE PROPERTY HERE, THE PUBLIC OWNS THIS LAND, THERE ARE ONLY CURRENT LEASEHOLDERS**

Furthermore, the very first two key declarations of the California Coastal Act state:

- **(a) That the California coastal zone is a distinct and valuable natural resource of vital and enduring interest to all the people and exists as a delicately balanced ecosystem.**
- **(b) That the permanent protection of the state's natural and scenic resources is a paramount concern to present and future residents of the state and nation.**

Surprisingly, out of all six NPS plans proposed, they picked the worst possible one for the environment, the wildlife within it and the American public who owns it. An overwhelming amount of citizens agree with this sentiment. Of the **7,600** public comments submitted to the NPS on their GMP, a massive **91%** of the comments opposed ranching or killing native wildlife to accommodate it. Also worth mentioning, over **46,000** people have signed the change.org petition “Save the Tule Elk” which actually focuses the public’s attention on much more than this one species. This petition asks for certain conditions to be met:

- The park should refuse to grant 20-year permits and leases to cattle and dairy ranchers. Ranchers have overstayed their original permit limits already. Long-term leases will set a terrible precedent in favor of private, commercial industry and jeopardize the future of our parks and the health of the ecosystem.
- Absolutely no diversification of ranch operations. Any diversification (such as chicken coops, pigs, sheep, row crops, etc) will only serve to attract more predators like coyotes, foxes, bobcats that will be in conflict with ranch operations and have to be “managed” as well.
- The park should revoke permits for all cattle and dairy operations and restore the leased land to its original, pre-industry state. The park should prioritize wildlife NOT commercial interests!
- Under no circumstance shall the park kill any Tule Elk.
- The park should prioritize Tule Elk habitat.

Surprisingly, the NPS states on their own website “as wild land habitat is lost elsewhere in California, the relevance of the Point Reyes Peninsula increases as a protected area with notable rich biological diversity.” Yet shockingly, the NPS fails to heed the solutions to many of the environmental threats we face, including the research, the data, and the scientific consensus that we humans must move away from destructive agriculture and restore and rewild as much of the

Earth as possible to stave off the worst impacts from these human created disasters - most notably the Climate Crisis and Mass Biodiversity Loss.

There are actually over 50 threatened, rare, or endangered species located in PRNS, yet these species and the unique habitats in which they are found are not prioritized above a special interest group that is found not only everywhere else in the region and state but throughout the entire country. In fact, there are actually more cattle in our PRNS than there are native Tule elk left in the world to give you some perspective. As noted above, but worth mentioning again, according to the US Department of Agriculture, there are over five million cattle (**5,125,000** to be exact) scattered across California, and over ninety-four million cattle (**94,400,000** to be exact) spread out across the entire country. Meanwhile there are only about five thousand to fifty-seven hundred endemic Tule elk left today, that's down from a historical population estimate of five-hundred thousand not all that long ago.

It is worth noting that over the past few months I have personally documented the deaths of at least **18** native Tule elk inside PRNS behind the massive 8ft high fence that prevents these rare and endemic animals from leaving the Tomales Point Reserve in order to find more adequate water and forage at times of year when they need it most. My findings have been the subject of a number of news stories, articles, public protests and ongoing multimedia projects. Uncovering this story has been one of the worst experiences of my life as I have grown very fond of the wildlife in PRNS and these iconic Tule elk specifically. It is absolutely mind boggling to me that in the year 2020 biodiversity and environmental health have fallen so low on the priority list for a National Seashore located along the California Coast.

It is essential that one understand the importance of the entire PRNS; it is actually a part of the greater UNESCO Golden Gate Biosphere Reserve. Why on Earth would the NPS want to further compromise and devastate such a critically important strip of our already severely diminished California Coast?

The United Nations released a deeply distressing report compiled by nearly 150 authors from 50 nations. Together they worked for 3 years as part of the Intergovernmental Science-Policy Platform on Biodiversity and Ecosystem Services - a panel with 132 member nations, including the United States. Representatives of each member nation signed off on the reports findings and the authors of the report urged dramatic action, for "Nature is declining globally at rates unprecedented in human history - and the rate of species extinctions is accelerating, with grave impacts on people around the world." The report also tells us "that it is not too late to make a difference, but only if we start now [yesterday] at every level from local to global [...]"

Indeed the scientific data, the peer-reviewed reports, the scholarly research, the film and photography documentation, as well as the good old fashioned field work being done by a small

but dedicated minority around the world continues to enlighten many of us of the ever-increasing, far-reaching threats and consequences we all collectively face. The NPS must prioritize environmental health and biodiversity first and foremost, nevertheless when they do not, it becomes paramount that agencies like the California Coastal Commission, heed this call and lead the way.

My experience/qualifications and conclusion:

I work as a freelance photographer and cameraman specializing on wildlife, nature, and conservation focused projects. While I have worked on big budget blue chip natural history productions throughout North America and have been awarded for my work in international photography competitions, I have also spent time working as a naturalist and field tech on various ecological/biological projects in California. Many of these projects require extensive field monitoring and explore impacts to native species. Especially relevant to this issue, I have spent more of my time observing, photographing, filming, and learning about the wildlife and ecosystems in Point Reyes National Seashore than I have spent anywhere else.

I am completely in awe of the complex interconnected natural world and the incredibly profound lifeforms found within it. While I continue to try my best to be optimistic in regards to the direction things are going, I am hard pressed to see a positive future when in one of the most progressive and environmentally minded communities in the world, the NPS plans to forever negatively alter a National Seashore and our internationally recognized California natural heritage along with it. In a state with numerous pressures as well as nearly 40 million residents, it is absolutely essential that environmental health and biodiversity be promoted, honored, restored, not further diminished, disregarded, and ignored.

Thank you for your time and consideration,

Matthew Polvorosa Kline

Lagunitas, CA

www.polvorosakline.com

December 15, 2020

To: California Coastal Commission
Subject: Coastal Consistency Determination for the Proposed Point Reyes National Seashore General Management Plan Amendment CD-0006-20

Dear Commissioners,

In the coming weeks you will be meeting to review and discuss an issue very dear to my family and me, an issue that involves our beloved backyard - Point Reyes National Seashore. While I have paid attention to the Commission's determinations in the past and have submitted letters before, I have never written to you with such purpose and concern.

A Federal Consistency Determination has been submitted to you by the National Park Service (NPS) at the Point Reyes National Seashore (PRNS), for an Activity that falls under the CZMA sec. 307(c)(1) and related provisions, and 15 CFR 930.30 and related provisions, requiring an assessment of consistency with the California Coastal Management Program (CCMP). The Activity is the adoption of amendments to the PRNS General Management Plan (GMP) and the accompanying FEIS (through a Record of Decision).

In the strongest terms possible, I urge the Commissioners to reject the horrendous plan by the NPS, as simply put, this submission is an absolute disgrace to our natural heritage here in California. The only National Seashore on the West Coast as well as our precious California Coastline and the varied ecosystems and biodiversity within deserve far better than this short-sighted plan. I urge the Commissioners to reject the insufficient NPS submittal because it misrepresents the consistency of the GMP with the California Coastal Act in a multitude of ways (Chapter 3 Article 2 - Public Access, Article 3 - Recreation, Article 4 - Marine Environment, and Article 5 - Land Resources).

The GMP amendments overwhelmingly benefit and further prioritize a few private for-profit leaseholders running intense agriculture operations above the unique and sensitive land and waters bought and paid for by American taxpayers decades ago. The GMP amendments further prop up a tiny select group of leaseholders over the broader American public, the people who actually own this land. It is long past due that this unique and sensitive stretch of precious California Coastline fulfills its promise and lives up to its fullest potential as a National Park.

While the NPS plan will allow a number of deeply concerning changes and further weaken what little environmental integrity remains in the areas diminished by decades of heavy agricultural use, these are some of the key things to be most concerned about; this plan will:

From: Linda Rames <ljrames@gmail.com>

Sent: Tuesday, December 15, 2020 9:24 PM

To: Simon, Larry@Coastal <Larry.Simon@coastal.ca.gov>; Lonna Richmond <lonnajeane@gmail.com>;
Chance Cutrano <ccutrano@rri.org>

Subject: Point Reyes Peninsula

12/15/20

Dear Mr. Simon:

My letter to you earlier today stated that 700 letters had been sent to the NPS regarding their preferred management plan. Actually, the number of letters sent to the park service was more than 7,000, of which more than 90 % were in favor of abolishing ranching on the Point Reyes Peninsula. Surely a message has been sent to the NPS that their preferred method is not what is wanted by the citizens of the United States who ultimately pay for their decision.

Linda Rames

From: roger.harris@comcast.net <roger.harris@comcast.net>

Sent: Tuesday, December 15, 2020 9:09 PM

To: Simon, Larry@Coastal <Larry.Simon@coastal.ca.gov>

Subject: Coastal Consistency Determination for the PRNS and North District GGNRA GMP Amendment and Environmental Impact Statement

Dear Mr. Simon:

I urge the California Coastal Commission to deny the National Park Service's request for a Coastal Consistency Determination for the Point Reyes National Seashore and North District Golden Gate National Recreation Area General Management Plan Amendment and Environmental Impact Statement.

The preferred Alternative B of the General Management Plan Amendment/Environmental Impact Statement would perpetuate private ranching activities, which conflict with the natural resource management mission of the park. I am particularly concerned about the impacts to special-status species, that were not adequately addressed in the EIS.

Expanded ranching activities, as mandated by Alternative B, will inevitably create more edible waste products which will attract an expanding population of common ravens, which in turn prey on the federally-list endangered western snowy plover. Last year, ravens even took and killed baby pileated woodpeckers out of a nest cavity in the park. This was photo-documented.

While ravens have historically inhabited the park lands, the expansion of ranching operations to include row crops, diversified livestock, and tourist houses all are additional sources of unnatural food that ravens will learn to use. These will expand raven populations and hence their pressure on sensitive prey species.

Professionally, I am a Certified Wildlife Biologist with 35 years of experience working in and studying the local ecology in Marin County. Thank you for this opportunity to comment.

Sincerely,

Roger D. Harris
10 Echo Avenue
Corte Madera, CA 94925
510/710-9120 (cell)

From: Gina White <gina.r.white@gmail.com>

Sent: Tuesday, December 15, 2020 8:28 PM

To: Coastal Point Reyes Management Plan <PointReyesManagementPlan@coastal.ca.gov>

Subject: Point Reyes

Dear Coastal Commission,

Please help protect our coastline and Point Reyes. Having commercial agriculture in Point Reyes violates many articles of the Coastal Act.

For example, the manure run-off from the cattle farms violates Article 4, section 30230, which states that "marine resources shall be maintained, enhanced, and where feasible, restored. Special protection shall be given to areas and species of special biological or economic significance.

Article 6, section 30251 provides that the scenic and visual qualities of coastal areas shall be considered and protected as a resource of public importance. The piles of manure covered with tarps and tires are not scenic. The plastic containers for cattle are not scenic. The natural grasslands being completely trampled into mud are not scenic. The barbed wire is not scenic, and restricts both people and wildlife from having access to the coast.

I could go on with the ways in which the commercial agriculture violates various articles of The Coastal Act. The bottom line is, there should be no ranching or other commercial endeavors in Point Reyes National Park. This is among the most protected lands in the country. All violations of The Coastal Act can be corrected by the ranchers moving off of this land.

The California Coastal Commission has a tremendous opportunity to do the right thing at this moment to protect our Coast and the National Park of Point Reyes.

Please help!

Thank you,

Gina White

From: adrescher@everyactioncustom.com <adrescher@everyactioncustom.com> on behalf of Anushka Drescher <adrescher@everyactioncustom.com>
Sent: Tuesday, December 15, 2020 8:09 PM
To: Weber, John@Coastal <john.weber@coastal.ca.gov>
Subject: Ranches at Point Reyes are unacceptable. Live your mission!

Dear John Weber,

To whomsoever is reading this:

You work for the NPS, so I would assume you care about nature. I would assume you don't go to a national park to see a confined animal feedlot, cow manure everywhere, and land grazed to bare dirt on what should be a lush coastal prairie. Have you seen the dairy operations with your own eyes? If not, I beg you to do so, because otherwise none of what I say will mean much to you.

I have visited Point Reyes many times, and I have to avoid the cattle ranches, because it is so upsetting to me to see the land degradation caused by the cattle, the elk trapped behind a large fence, and barbed wire all over the ranch area. It is heart-breaking, actually. Point Reyes could be the Yellowstone of the West Coast. It should be! It was supposed to be! The ranchers were PAID TO LEAVE! WHY WHY WHY does NPS keep them there? It is totally against the original intent of the park.

If the NPS had any integrity, it would do what is right and adopt Alternative F of the plan, and NO OTHER ALTERNATIVE. Nothing but Alternative F is consistent with what Point Reyes was supposed to be.

I strongly object to the National Park Service's adoption of Alternative B for the General Management Plan amendment for Point Reyes National Seashore. I oppose the killing of native wildlife and the designation of commercial agriculture as the park's main use. Alternative B elevates private profits and entitlements while conflicting with the Park Service's mandate to preserve the natural environment for public benefit. I'm asking you to do everything in your power to stop this plan.

The native tule elk are an iconic part of the natural landscape at Point Reyes and are the only tule elk herds within the national park system. There's no ecological justification or valid management reason for harassing, fencing or shooting elk in the park. Commercial lease holders on our public lands shouldn't be dictating policies that persecute the park's wildlife.

Alternative B doesn't manage commercial ranching leases to accommodate elk or other native wildlife, nor does it adequately manage cattle grazing to protect coastal ecosystems, wildlife habitat, water quality, soil and native vegetation. Instead it sets a horrible precedent by expanding private agricultural uses on our parklands, allowing row crops and introducing sheep, goats, pigs and chickens, which will inevitably create more conflicts with other wildlife in the park.

I urge the Park Service to reject Alternative B and instead approve Alternative F, which would phase out cattle ranching, expand recreation opportunities, and allow the elk to roam free throughout the national park. Alternative F is the only option that prioritizes the outstanding natural values of Point Reyes National Seashore for the public benefit.

Sincerely,
Anushka Drescher
Berkeley, CA 94702
adrescher@sbcglobal.net

From: Jill Lublin <jill.lublin@gmail.com> on behalf of Jill Lublin <jill@jilllublin.com>
Sent: Tuesday, December 15, 2020 7:30 PM
To: Weber, John@Coastal <john.weber@coastal.ca.gov>
Subject: The tule elk must be saved

The plan to kill them is unacceptable! The point Reyes coast is made incredibly special because of them! The ranchers have already plenty of space! we need our wildlife to have equal opportunity! The beaches and wild life already have limited access it's important that our wildlife run free! The coast is made so very special by these magnificent creatures!

Buy Jill's newest book Profit of Kindness at www.profitofkindness.com. Jill Lublin is an international renowned speaker on the topics of publicity, kindness, referrals and networking. As author of the Best-Selling book "Get Noticed Get Referrals" (McGraw Hill) and co -author of the Best-Sellers Guerrilla Publicity (Adams Media) and Networking Magic (Morgan James),
Jill is a master strategist on how to capture the attention of the media and increase your visibility in the marketplace.

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Please connect with me on my social network profiles:

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Friend me on Facebook :
[Http://www.facebook.com/people/jill-Lublin/1143437802](http://www.facebook.com/people/jill-Lublin/1143437802)

Linda Rames
240 Morning Sun Avenue
Mill Valley, CA 94941

December 15, 2020

Mr. Larry Simon
Federal Consistency Program
California Coastal Commission
45 Fremont Street, Suite 2000
San Francisco, CA 94105

Subject: National Park Service management of the Point Reyes National Seashore

Dear Mr. Simon:

For a variety of reasons we do not believe the preferred alternative of the NPS for the management of the Point Reyes National Seashore should be accepted by the California Coastal Commission; however, the three most compelling reasons are:

1. The coastal waters surrounding the Point Reyes peninsula are being continually polluted by the ranchers watering down cattle feces which are then allowed to leach into the estero and Tomales Bay.
2. Cattle ranching has diminished the natural beauty of the grasslands to the point of the land being mostly a mixture of mud and feces with little evidence of native species of grasses.
3. The Tule Elk, an endangered California species, is in danger of being wiped out by culling to accommodate the ranchers.

This once beautiful peninsula was bought by the federal government in 1962 to be a national park. The ranchers were paid for their land and allowed to continue ranching for 25 years or as long as the original sellers wished. It is long past the time these ranches should be allowed to revert to nature.

In an effort to appease the public, the NPS allowed a time for public commentary on the future use of the land. There were more than 700 written responses.

2.

More than 90% of the respondents wanted the ranches removed. We think these letters speak to the wishes of the general public. The ranches need to be removed. The current leases are due to end in 2022. They should not be renewed for any length of time.

In addition to the above reasons to end this decimation of public land, the ranches provide very little profit. There are 24 ranches and the total amount paid to the federal government yearly is approximately \$500,000. That is an average of \$20,833 paid yearly to the government by individual ranchers. And, that amount includes the ranch land leased, the rent for the barns and the rent for the residence on the property. It is clear that the federal government is financing this group of ranchers at the behest of the National Park Service. The question is why is this being allowed to continue in a national park?

For the above reasons, we believe it is time that the NPS begin to work for all of us, not just this small group of privileged ranchers. We do not think this is what the government had in mind when the ranchland was purchased in 1962. We think the park service needs to choose the alternative of no ranching in this park so that all citizens can enjoy the experience of the Point Reyes National Seashore without fences or impediments on the land or pollution in the waters. We sincerely hope the California Coastal Commission agrees and will guide the NPS to choose the better alternative.

Sincerely,

Linda & Robert Rames

From: Dan Maher <rjdmaher@gmail.com>
Sent: Tuesday, December 15, 2020 7:29 PM
To: Coastal Point Reyes Management Plan <PointReyesManagementPlan@coastal.ca.gov>
Cc: Weber, John@Coastal <john.weber@coastal.ca.gov>; Carey feierabend@nps.gov<[Carey feierabend@nps.gov](mailto:Carey_feierabend@nps.gov)>; Craig Kenkel @nps.gov <Craig_Kenkel@nps.gov>; Ryan olah@few.gov <Ryan_olah@few.gov>
Subject: Pt Reyes & Tule Elk

Dear Committee Members:

I urge you to do your best to preserve coastal access for the public, prevent water pollution from nearby commercial operations, and maintain the natural historic character of the area, as is in keeping with the mission of the Coastal Commission.

Cheers,

Dr. Dan Maher
40 Prairie Falcon Dr
Novato 94949

"I would rather have questions I can't answer, than answers I can't question." - Max Tegmark

From: Carol Soto <carol111us@yahoo.com>

Sent: Tuesday, December 15, 2020 6:50 AM

To: Coastal Point Reyes Management Plan <PointReyesManagementPlan@coastal.ca.gov>

Subject: Comment on Proposed Plan

Hello,

The proposed plan for the management of the Tule elk herds in the Seashore which gives priority to grazing cattle and milk cows is in opposition to the NPS's duty to our national parks. Retaining and enhancing our natural heritage, which includes the Tule elk, is being forfeited in favor of commercial interests.

Please rethink this plan.

Thank you,

Carol Soto

From: Ellen Shannahan <ellen101@comcast.net>

Sent: Tuesday, December 15, 2020 6:08 PM

To: Weber, John@Coastal <john.weber@coastal.ca.gov>

Cc: carey_feierabend@nps.gov <carey_feierabend@nps.gov>; Craig_Kenkel@nps.gov <Craig_Kenkel@nps.gov>

Subject: Tule Elk- Pt. Reyes Must be Protected

Dear Sir,

I just read the Marin IJ very detailed story on the coastal commission's desire to cull the elk and give priority rights to the ranchers. I am sure you have the article and know why so many people are upset. How can you approve of erosion, manure pollution and harm to our coastal marine life?

Certainly it's not the cows fault- it's the ranchers who care about nothing but profit. These are federal lands and should be protected. The elk need to be able to live and have access to water, not allowed the cruelty of dying of thirst.

Please look to your conscience and think of our lands and future generations.

Thank you.

Ellen Shannahan

From: Lonna Richmond <lonnajeane@gmail.com>
Sent: Tuesday, December 15, 2020 3:43 PM
To: Simon, Larry@Coastal <Larry.Simon@coastal.ca.gov>
Subject: WHAT IS A NATIONAL PARK?

Dear Mr. Simon, this is a question I asked myself regarding Pt. Reyes National Seashore, and these are my thoughts:

According to the Park Service: **NPS's mission is to "conserve the scenery and the natural and historic objects and wildlife therein, and to provide for the enjoyment of the same in such manner and by such means as will leave them unimpaired for the enjoyment of future generations."**

What started out as a win-win for ranchers and dairies being able to live and work within the confines of a National Park has devolved and what was once iconic coastal prairie has been turned into a veritable dust-bowl. Now that the dairy and beef businesses are floundering, these "squatters" want to diversify and expand, rather than move out like they were paid to do 58 years ago. PRNS management has become as twisted as the miles of barbed wire fencing that zig-zags around our national parklands at Pt. Reyes. I don't know how many miles of fencing there are, but under the new management plan, they want to add an additional 24 miles, all to protect the land and water for the cows; thereby leaving the endemic, fenced in tule elk herd, i.e. wildlife, to die of thirst and/or malnutrition.

These indigenous elk have been brought back from near extinction - a huge success story for PRNS, yet now they are struggling to survive with a cruel taskmaster that keeps them fenced in. People from all over the world come to see these magnificent and majestic tule elk, found only in California, with a total population of around 5700 animals. In Pt. Reyes alone there are around 500 elk and roughly 6500 cows. The Park Service says they must "cull" the elk, which means kill the elk, because they are exceeding the carrying capacity. What about the carrying capacity of cows?

This is not an argument against ranching and dairy businesses, but it is an argument for them to move off our public lands and let the tule elk roam as they once did, before this land was stolen from the Coast Miwok. Who, by the way, stewarded and revered the lands they were blessed to live upon, not like the private businesses who have now degraded, eroded and polluted it.

Sincerely,
 Lonna Richmond
 Muir Beach, CA





From: Stan Schilz <binker3@icloud.com>
Sent: Tuesday, December 15, 2020 2:32 PM
To: Weber, John@Coastal <john.weber@coastal.ca.gov>
Subject: Upcoming Decision

Please favor the Tule Elk. Cattle do not belong on Pt Reyes.
Thanks,
Stan Schilz

From: Catherine Portman <cportman@gmail.com>
Sent: Tuesday, December 15, 2020 2:29 PM
To: Simon, Larry@Coastal <Larry.Simon@coastal.ca.gov>; Coastal Point Reyes Management Plan <PointReyesManagementPlan@coastal.ca.gov>
Cc: Weber, John@Coastal <john.weber@coastal.ca.gov>; Carey_feierabend@nps.gov; Ryan_olah@few.gov
Subject: Point Reyes management plan NOT consistent with CCC

December 15, 2020

Dear Commissioners,

Re: Point Reyes National Seashore management plan CD 006-20

I urge you to reject the National Parks Service's request for consistency determination for their Point Reyes National Seashore management plan. The PRNS management plan in no way aligns with the CCC's mission or natural resource preservation mandates.

There are volumes of scientific data describing the detrimental impact of cattle on native flora and fauna and pollution of waterways. The EIS includes the Water Quality Board's assessment of Tomales Bay tributaries as "impaired" under the Clean Water Act. The Water Quality Board also noted that cattle are associated with high fecal coliform, spread invasive weeds and degrade native vegetation. Sometimes the beaches are closed because of cow manure. The USDA notes that 130 million pounds of manure goes into PRNS ponds, wetlands, tributaries and the Pacific Ocean.

The December 9th, 2020 letter from the Western Watershed Project, Center for Biological Diversity, In Defense of Animals, ForElk.org and others, comprehensively describes, provides photo documentation and literature citations of the destruction of PRNS from cattle ranching. I incorporate that letter by reference.

The promotion of cattle ranching in NPS management plan will lead to further degradation of natural resources, native wildlife, reduction of public access and impair vistas and is completely **inconsistent** with the Commissions mission and natural resource preservation mandates.

Catherine Portman
14841 CR 91 B
Woodland, CA 95695
cportman@gmail.com
5306660882

California Coastal Commission
Larry Simon
455 Market St, Suite 300
San Francisco, CA 94105

December 15, 2020

Dear Commissioners,

Re: Point Reyes National Seashore management plan CD 006-20

I urge you to reject the National Parks Service's request for consistency determination for their Point Reyes National Seashore management plan. The PRNS management plan in no way aligns with the CCC's mission or natural resource preservation mandates.

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Catherine Portman
14841 CR 91 B
Woodland, CA 95695
cportman@gmail.com
5306660882

From: Cat Mom <ginaward2000@gmail.com>

Sent: Tuesday, December 15, 2020 1:16 PM

To: Coastal Point Reyes Management Plan

<PointReyesManagementPlan@coastal.ca.gov>; [Carey feierabend@nps.gov](mailto:Carey_feierabend@nps.gov) <[Carey feierabend@nps.gov](mailto:Carey_feierabend@nps.gov)>; [Craig Kenkel@nps.gov](mailto:Craig_Kenkel@nps.gov) <Craig_Kenkel@nps.gov>; Weber, John@Coastal <john.weber@coastal.ca.gov>

Subject: Thule Elk

It is irresponsible and unconscionable that you would even consider murdering the very beautiful and innocent elk for farms. You are destroying a national park. A national park is not a pile of cow manure which by the way, is causing way more destruction than the elk. The erosion and manure pollution is harming coasting marine life. People come from all over the world to see the Thule elk and you wish to kill them for profit off land that is supposed to be federally protected land. You should be ashamed of yourself.

The surrounding counties will not give up their fight against this and anyone who supports it.

Gina Ward

December 14th, 2020



Mr. Larry Simon
Federal Consistency Program
California Coastal Commission
45 Fremont Street, Suite 2000
San Francisco, CA 94105

Subject: Coastal Consistency Determination for the Point Reyes National Seashore and North District Golden Gate National Recreation Area General Management Plan Amendment and Environmental Impact Statement

Dear Mr. Simon:

The purpose of this letter is to express Marin Conservation League's support of the National Park Service's (NPS) request for a Coastal Consistency Determination (CDC) for the subject action.¹

Under the Preferred Alternative (Alternative B in the General Management Plan Amendment/Environmental Impact Statement [GMPA/EIS]), the NPS is offering up to 20-year leases to multi-generational dairy and cattle ranches that have occupied the land for more than 150 years. Granting 20-year leases will give ranch owners a certainty of tenure, enabling them to invest in ranch infrastructure to assure the future viability of their operations and make necessary improvements to better protect natural resource values, such as water quality and sensitive habitat areas. The GMPA/EIS, including Appendices (notably Appendix F) details the conditions under which ranching would continue.

In general terms, MCL supports the continuation of historic family ranching on Point Reyes National Seashore (PRNS, Seashore, or Park) and the Northern District of Golden Gate National Recreation Area (GGNRA) under the guidance of an environmentally-sound management approach spelled out in the GMPA/EIS. Anchored by Ranch Operating Agreements (ROAs) between NPS and ranch owners and a sub-zoning plan designed for each ranch to protect sensitive resources from ranch operations, the approach consists of a comprehensive suite of strategies (detailed in Appendix F) that would be incorporated into each ROA, thus ensuring that the desired conditions laid out

¹ To clarify the purpose of a Coastal Consistency Determination: Section 307 of the "[Coastal Zone Management Act of 1972](#)" (CZMA), requires that federal actions – including those on NPS parks not in the California Coastal Zone that might affect the state's interest in land, water or other natural resources within the coastal zone – be consistent with the enforceable policies of the state's federally approved coastal management program. A "consistency determination" is a brief statement describing how the proposed activity will be undertaken in a manner consistent to the maximum extent practicable with enforceable policies found in Chapter 3 of the California Coastal Act. The Coastal Commission's goal is to provide open communication and coordination with federal agencies and provide the opportunity for the public to participate in the process.

in Chapter 1 (Page 2) of the GMPA/EIS would be met. These strategies include standardized management activities, employing “practice standards” based on federal and state agency regulations and guidance, and implementing required mitigation measures and other conditions outlined in the EIS and detailed in Appendices.

Continued ranching under these terms described in the Preferred Alternative would be consistent with “the natural environment, recreational opportunities, and the scientific and historical merits” that prompted the park’s original and later-amplified legislative authorizations.

With implementation of the conditions outlined above and discussed in greater detail below, MCL believes that the Preferred Alternative also is consistent with the policies in the California Coastal Act of 1976 as amended. Because the GMPA/EIS covers both detailed actions and programmatic elements, the NPS is requesting a Consistency Determination only for detailed actions. Projects under programmatic elements proposed during the 20-year GMPA plan period, such as diversification and some visitor amenities, would require subsequent environmental review, and possible CCC consultation.

MCL’s letter incorporates by reference the summary description of the GMPA/EIS Preferred Alternative contained in NPS’ letter to the CCC, dated October 16, 2020. To

PRNS connections and MCL assumptions

Four assumptions based on the factual record undergird MCL’s position:

1. First, it is necessary to view PRNS in its historic and local context as well as in terms of its national significance. Its history reveals that many parts had to come together to preserve this unique coastal site of natural beauty, scientific and historic/cultural interest, rare plants and wildlife, and public recreation as national park.

From inception in 1916 of the National Park System – regularly proclaimed “America’s greatest idea” but in reality an amalgam of ideas that have evolved over time – national parks have been interconnected with the surrounding world, with deep economic and cultural connections to adjacent communities and ecological linkages to surrounding landscapes. They have never served as isolated nature reserves.²

No national park demonstrates these connections as consistently as Point Reyes National Seashore. Set on the Pacific Coast within the West Marin context, with its millennia-old indigenous heritage, its historic, generations-old agricultural and rural village culture, as well as its location within an hour’s reach of a large metropolitan population, the Seashore is the product of the local, regional, and

² Keiter, R.B., *To Conserve Unimpaired: The Evolution of the National Park Idea*, Island Press, 2013

national interests that came together in an eons-old geologic and ecological coastal setting to create the priceless and multi-faceted park that millions enjoy today!

2. As a second assumption, MCL is highly qualified to comment on PRNS as a public park of national and local significance. Few organizations are as intimately connected with the early history of PRNS as MCL. MCL, founded in 1934 as the Golden Gate Bridge was under construction, was among the first to identify the need to protect Marin's scenic coastal lands for the public and to act on it. At that time these lands were completely open to private exploitation. From a planned list of priorities for acquisition, MCL's first documented success was acquisition of a 54-acre property including Drakes Beach, the first "piece" of the National-Seashore-to-come. In the two decades that followed, MCL founders facilitated acquisition of other coastal sites that eventually became state parks and initiated or participated in many other public land acquisitions, including the Golden Gate National Recreation Area (GGNRA). MCL's key motivation behind these actions was to save special lands for public enjoyment. Ecosystems and sensitive habitats were not yet in the conservation vernacular.

Throughout the 1950s, MCL worked closely with other conservationists to seek protection for Point Reyes Peninsula from the destructive consequences that commercial and residential development could have. With authorization of most of the peninsula as a national park in 1962, some expressed interest in preserving the human as well as the natural landscape under the aegis of the NPS. Caroline Livermore, then president of Marin Conservation League, wrote, ". . . as true conservationists we want to preserve dairying in this area and will do what we can to promote the health of this industry which is so valuable to the economic and material well-being of our people and which adds to the pastoral scene adjacent to proposed recreation areas."³

In the late 1960s, MCL devoted hundreds of hours and financial resources to the 1969 "Save Our Seashore" campaign to obtain Land and Water Conservation funds for acquiring the ranches. Ranchers played a key role in this campaign by supporting the new park and willingly selling their lands to fulfill the congressional intent. In the 1970s, MCL also advised protecting the park as a natural area in the preliminary master plan for the Seashore, and advocated for the maximum area to be designated as Philip Burton Wilderness.

3. MCL's third assumption concerns the role that cattle and dairy ranching continue to play as an important component of the Seashore's (and GGNRA's) cultural and natural resource values. This role has been acknowledged over the past fifty years in legislative authorizations, amendments and clarifications, and management policies. The NPS' working relationship with the ranches in the park was fostered

³ Livingston, D.S., *Ranching on the Point Reyes Peninsula – 1834-1992*, National Park Service, 1993, rev. 1994

by early park administration, which recognized that cows and cattle were “co-managers” of the scenic pastoral grassland landscape that would devolve into brush without a regular grazing regime. There were later indications that the working relationships between ranchers and park management were generally positive, and that the park was committed to keeping the ranches viable as an integral part of the national seashore as well as the GGNRA Northern District. Their historic significance was reinforced by their later designation as Historic Districts and their recognition as cultural resources to be protected in concert with protecting and preserving the well-documented natural and indigenous resources throughout the Park.

4. As a fourth assumption, the history of Marin County agriculture, including production records, has demonstrated for decades that the ranches on Point Reyes are an integral part of a single cultural heritage and agricultural economy. Roughly one third of Marin County’s land area is made up of rural rangeland and family farms. Together, ranches, both on and off the Seashore, constitute a critical mass that enables the whole to remain viable. MCL has long recognized the value of these agricultural lands and developed a supportive relationship with dairymen and ranchers in West Marin. As a previous Executive Director of MCL stated: “If you sold off the agricultural land and just let it go for open space, it would change the character dramatically . . . it would not be the pastoral scene we know today.”

Consistency with provisions of the California Coastal Act

The primary goal for amending the General Management Plan for this unique coastal resource over the next 20 years is to achieve the “Desired Conditions” articulated in the GMPA/EIS (Chapter 1). These conditions are organized around. . .

- preservation of ecological functions;
- preservation of native species, including threatened and endangered species;
- management of invasive/non-native species;
- preservation of cultural resources (including historic ranches); and
- public use and enjoyment/visitor experience.

In essence, these have been at the core of the Seashore’s management policies over the past fifty-years. Without exception, these “desired conditions” are consistent with key policies in Articles 2 through 6 of the Coastal Act that have protected California’s Coast for almost the same period of time, namely:

- provision of public access and recreational opportunities;
- protection of coastal waters and unique and sensitive marine and land resources;
- maintenance of prime agricultural land and the agricultural economy; and
- protection of scenic and visual qualities.

The actual achievement of these desired conditions in the Seashore, which are aspirational in nature, depends on successful implementation of a detailed and

comprehensive set of management actions that make up the Preferred Alternative, described in the GMPA/EIS, detailed in Appendices, and summarized in Table 2: Strategies for the Preservation of Area Resources, pages 29-32. Appendix F presents an inventory of management activities, practice standards, and required mitigations. Mitigation measures specific to avoiding impacts to threatened and endangered species are detailed in Biological Assessments (Appendices N and O). Implementing these conditions would accomplish the purposes of the Preferred Alternative. The discussion below offers selected examples of the many NPS management strategies that demonstrate consistency of the Preferred Alternative with Coastal Act policies.

Articles 2 and 3 – Public Access and Recreation

“ . . . maximum access. . . shall be conspicuously posted, and recreational opportunities shall be provided for all the people consistent with public safety needs and the need to protect public rights, rights of private property owners, and natural resource areas from overuse.” (Section 30210)

“ . . . ocean front land suitable for recreational shall be protected for recreational use and development. (Section 30221) . . . upland areas necessary to support coastal recreational uses shall be reserved for such uses.” (Section 30223)

The Seashore welcomes more than 2.5 million visitors annually and provides wide ranging opportunities and facilities for educational and scientific activities, affordable day and overnight accommodations such as camping, volunteer programs, trails for hiking, equestrian, and cycling recreation, and wide-ranging opportunities for “sight-seeing.”

Public access currently is allowed in the existing Pastoral Zone (to be renamed as the Ranchland and Scenic Landscape Zones under the Preferred Alternative), consistent with the need to avoid disrupting ranch operations and infrastructure, protect ranchers’ privacy, and ensure safety. Many of these public amenities are made possible through partnership with the non-profit Point Reyes National Seashore Association’s robust program of educational and volunteer activities.

These would all remain under the Preferred Alternative. The Ranchland and Scenic Landscape zones would continue to maintain the current landscape and public access to coastal and upland sites for access and recreational and educational use. In addition, the GMPA/EIS describes numerous possible projects to enhance existing opportunities. Most are described and their impacts analyzed at a programmatic level. For example, proposals to enhance a network of connecting trails and old ranch roads, detailed in Appendix H, could be proposed over the 20-year plan horizon covered by the EIS, and would require site-specific environmental review. Similarly, proposed farm stays and farm tours to engage ranchers in the Seashore’s interpretive programs would require subsequent environmental review and possible coastal consistency. Appendix I discusses indicators and thresholds for visitor use and enjoyment, and considers visitor capacity and addresses issues such as traffic and parking and the need for shuttle systems. The

NPS does not anticipate expanding levels of visitor access under the Preferred Alternative. Even with some enhanced options, e.g., trail loops and connections, or new interpretive programs, visitor use would continue to be managed to avoid sensitive resources in the Park.

Article 4 – Marine Environment

“ . . . The biological productivity and the quality of coastal waters, streams, wetlands, estuaries, and lakes . . . shall be maintained and, where feasible, restored through . . . minimizing adverse effects of waste water discharges and entrainment, controlling runoff . . . encouraging waste water reclamation, maintaining . . . riparian habitats . . . ”
(Section 30231)

The planning area does not include marine waters. It does, however, include watersheds and streams that carry runoff from cattle and dairy operations and discharge into esteros and the ocean and Tomales Bay via Olema Creek, thus potentially impacting the quality of coastal waters and related biological productivity. Ranch activities that require water quality and erosion management include road and other infrastructure maintenance, stream stabilization and riparian protection, water supply for livestock, stream crossings, and, in the case of dairies, manure and nutrient management.

This complex issue is analyzed in depth in the GMPA/EIS and Appendix L. The NPS and ranchers over recent decades have already implemented many management activities to improve water resource conditions but acknowledge the need for improvements. The Preferred Alternative’s approach to protecting sensitive resources from water pollutants involves a comprehensive suite of actions, beginning with the zoning and ranch sub-zoning strategy outlined in Appendix J, in which ranch operational areas are separated by intensity of use and to avoid sensitive resources. The GMPA/EIS then describes the existing water control management actions and presents in Table 3, Page 40, an array of management actions to monitor and further improve water quality.

Actions to manage manure and nutrients and associated water quality apply only to the six dairy ranches. To avoid polluting nearby streams and wetlands, water and waste from confined animal facilities have been regulated for many years by the state’s San Francisco Bay Regional Water Quality Control Board. Under the Preferred Alternative, ranches would continue to operate under these regulations, with improvements outlined in Appendices F and L. With these actions, the desired conditions listed in Table 2 would be achieved.

Article 5 – Land Resources

“ . . . Environmentally sensitive habitat areas shall be protected against any significant disruption of habitat values . . . and development in areas adjacent to environmentally sensitive habitat areas and parks and recreation areas shall be sited . . . to prevent impacts. . . and shall be compatible with the continuance of those habitat and recreation areas. ” (Section 30240)

Many of the actions described above for protecting marine resources also apply to protecting environmentally sensitive habitat areas in the planning area against potential disruption from cattle and dairy operations: Zoning and sub-zoning of ranches to avoid impacting sensitive habitats; a comprehensive suite of management activities, practice standards, and mitigations identified in Appendix F; and mitigations defined in the Biological Assessments, Appendices N and O. As noted in the EIS, the grazing regimes associated with livestock vary in their impact on special status plant species. Grazing can be both beneficial for some species and damaging for others. To minimize these impacts, 1,200 acres are currently set aside as Resource Protection Buffers. The Preferred Alternative would add 800 acres to these protective buffers.

“. . . the maximum amount of prime agricultural land shall be maintained in agricultural production to assure the protection of the areas’ agricultural economy.” (Section 30241)

The adoption of a Ranchland Zone under the Preferred Alternative would not expand or otherwise change the area of ranching on either PRNS or GGNRA Northern District. Nor would it expand the stocking capacity for livestock. It would, however, offer the opportunity for limited diversification of ranching activities. The addition of chickens, goats, or sheep, or dryland cropping, for example, would allow ranchers to react to poor forage production years and fluctuation in the economic market (e.g., the price of cattle, hay, and grain).

The prospect of diversification has been misunderstood in public comments as though it would open the door to unlimited options. In fact, any diversification would be limited in scope – chicken or goat “animal units” would replace not add to comparable cattle animal units. Activities would be restricted to the ranch core or, where warranted, the pasture zones. Further, as stated in the EIS (ES Page iv), proposals for diversification would only be considered if they incorporate the US Department of Agriculture, Natural Resources Conservation Service Conservation Practice Standards and mitigation measures for a defined set of Management Activities identified in tables F-11 through F-13 of Appendix F of the EIS. NPS would continue to work closely with local agricultural organizations, state agencies, and natural resource conservation experts to share information and discuss issues related to ranching.

Article 6 Development

“. . . the scenic and visual qualities of coastal areas shall be considered and protected as a resource of public importance. . . to minimize the alteration of natural land forms, to be visually compatible with the character of surrounding areas. . .” (Section 30251)

The connection between national parks and cultural resources is well established in federal law. The act that created the NPS in 1916 mandated that “. . . natural and historic objects and the wildlife therein. . .” be protected for public enjoyment. Over the years the idea that cultural resources are a matter of national interest has been affirmed by

numerous congressional actions, including the National Historic Preservation Act and its amendments. Federal law and NPS policies now place equal weight on protecting natural, historic/cultural, and scenic values.

The historic/cultural and scenic resources that are being preserved on PRNS and GGNRA, along with their rich natural resources, are a combination of the historic pastoral landscape and the multi-generational farm families, who, four and five generations later, are the legacy of an historic period of dairies and farming that dates back to the mid-1800s.

Notable is the role played by the “historic pastoral landscape,” which includes not just historic farm structures, but also the dominant scenic rangeland vistas that meet the eye of the visitor. Without continuation of the grazing regimes managed by cattle, that grassland scene would change dramatically, as evidenced on former ranches that have been retired and cattle grazing has ceased. The Preferred Alternative is not the only alternative that would protect this scenic resource, but it presents the optimum combination of preserving the array of values that have been discussed above. It also would be maximally consistent with Coastal Act policy that calls for “minimizing the alteration of natural land forms.”

Drawing on these comments as examples, MCL believes that the Preferred Alternative examined in detail in the GMPA/EIS demonstrates not only a high affinity with the purposes of the California Coastal Act but also consistency with most of the specific policies set forth in Chapter 3.

In summary, Marin Conservation League believes that the NPS Preferred Alternative analyzed in the GMPA/EIS is consistent with the Coastal Act because . . .

- Both PRNS and GGNRA will continue to provide opportunities for visitors from around the world to enjoy the coastal resources that they encompass and at the same time preserve their richly diverse natural and cultural resources;
- Under the Preferred Alternative, both parks will continue to maintain, among their other purposes, productive ranching operations that are the legacy of a 150-year-old culture and occupy a significant role in the local agricultural economy. Offering up-to-20-year leases will ensure the ranches’ continued viability and enable investing in long-term environmental improvements;
- The GMPA/EIS and its Appendices present a comprehensive suite of practices, including zoning and sub-zoning, mitigation measures and other conditions applicable to each ranch. Under the regulatory and guidance oversight of NPS and multiple agencies, these conditions will assure that coastal marine and land resources continue to be protected from the potential impacts of ranching operations;
- The continuation of a grazing regime under the Preferred Alternative will assure that the pastoral landscape, dominated on PRNS by broad vistas of grassland, will not be irreversibly altered if the present grazing regime were to cease; and

- Agriculture in the two parks will not expand under the Preferred Alternative; closely delimited diversification will, however, offer ranchers a buffer against the economic vicissitudes of cattle and dairy-based agriculture.

In closing, public comments too often reveal a “black and white” view of the NPS options on Point Reyes and GGNRA – either ranches, *or* wild nature. Marin Conservation League believes that these can coexist under thoughtful and sensitive park management and continue to enrich the lives of millions of visitors. Thank you for your attention to this important issue.

Sincerely,



Robert Miller
President



Nona Dennis
Chair, Parks and Open Space Committee

Cc: Jared Huffman, US Congressman, California 2nd District
Laura Joss, General Superintendent Golden Gate National Recreation Area,
National Park Service
Carey Feierabend, Deputy Superintendent, Point Reyes National Seashore



Marin Audubon Society

P.O. Box 599 | MILL VALLEY, CA 94942-0599 | MARINAUDUBON.ORG

December 14, 2020

John Weber
California Coastal Commission
455 Mission
San Francisco, CA
John.Weber@coastal.ca.gov

RE: Comments on Point Reyes National Management Plan and Final Environmental Impact Statement (EIS)

Dear Commissioners:

Thank you for the opportunity to comment on the Point Reyes National Seashore Management Plan Consistency Determination. Marin Audubon has a number of issues about the Point Reyes Management Plan and DEIR that we request be considered by the Commission. While the documents are extensive and the justifications detailed, there are sufficient issues and questions that should preclude the Plan as from being found consistent with the Coastal Zone Program. As discussed below, our problems focus on the adverse impacts of the proposed essentially-permanent agriculture. While EIS appendices include standards and mitigation measures that would provide some protection for the Seashore's natural resources, the driving force of Alternative B is continuing agriculture. The habitat benefits for native wildlife and habitat resources are secondary to the needs of agriculture. As a result, we are concerned that these publically owned lands will not be managed in the interest of then public. Our concerns about the Succession Policy, the Lease and potential adverse impacts are addressed below. With the current level of analysis and resource protections, the Plan cannot be found to be consistent with the Coastal Zone Management Act.

Succession Issues

Marin Audubon is not opposed to agriculture at the Seashore. We support a gradual phasing-out of all or a significant number of ranches. This gradual reduction should be based on attrition, if no family members wish to continue agriculture, the lands should restore to natural habitat. We consider that this would be fair to the current ranchers because it would not require them to leave in a short time as other alternatives would. In the long term, it would benefit the Seashore ecosystems, the needs of wildlife that depend on them, and would benefit the public's interest in protecting these unique and diverse habitats.

The Succession Policy has been improved from the original draft. It now allows that if family members do not wish to continue in agriculture or Lessees have not consistently met performance standards, the NPS would consider applications from other leaseholders or Park ranch workers operating in the Ranchland Sub Zone. If there is still no interest, the NPS would "pursue a public process to identify an appropriate future use of the land." So while there is a chance one or more ranch properties could be restored to nature, that chance is probably slim. The proposed public process just postpones a difficult decision.

A policy providing that certain ranches be restored to viable natural habitat when there are no longer family members interested in continuing should be based on restoring those lands that would protect valuable natural resources and provide the most benefit for wildlife.

NPS justifies continuing ranching by classifying agricultural use as a cultural resource that is important preserve for the public. Thirty ranches are not needed to demonstrate historic ranching. A limited number of ranches could be preserved to demonstrate historic uses. The decision, on which ranches would be restored, should be based, as stated above, on protecting valuable natural resources and habitat for wildlife.

Lease Issues

Provisions of the proposed Lease Agreement are also a concern. Because the Lease sets out the legal responsibilities for Lessor and Lessees, what is expected of the ranchers and what actions the NPS can take, it is an essential component of the We are concerned about provisions to cure defaults and provisions for termination of leases.

Section 32.1 is clear: "...if Lessee fails to keep and perform any of the Provisions of this Lease, this Lease shall become void at the option of the Lessor." Lessor that Lessor shall state intention "to declare the Lease forfeited if such default continues." Note that the NPS is not required to take any action.

Section 32.2 If Lessee does not cure the Default or present a reasonable plan...then Lessor shall be entitled to the possession of the Premises, and *may* enter into the property and expel Lessee...."

Section 32.3 "It is further agreed that all rights of Lessee under this lease shall, *at Lessor's option, be revoked....*"

Section 32.6 "*At the option of Lessor, Lessor may, in lieu of revoking this Lease, revoke Lessee's authorization to conduct the activity giving rise to the Default or assess a penalty of \$100 .000 per day for any failure....*"

Section 33 "If Lessee shall fail or neglect to do or perform any act or thing provided in this Lease to be done or performed and such failure shall not be cured within the

applicable grace period provided for in Article 32 of this Lease, then *Lessor may, but shall not be required to do or perform or cause to be done or performed any other act or thing* (entering upon the Premises for such purpose, if Lessor shall so elect), and Lessor shall not be held liable....”

Two aspects are notable about the above quotes from the Lease: that taking any action at all is completely at the discretion of the Lessor. This vague wording should be corrected. There should be criteria that will assure specific actions to cure Default and protect natural resources will be taken. Secondly, the final action by the NPS set forth in Section 33 is unintelligible. It fails to identify any action Lessor will take. It reads as though there may be words omitted.

To ensure compliance with the ROAs, standards and mitigation measures, the above provisions of the Lease should be changed and clarified to require actions to penalize Leaseholders or terminate Leases when requirements are not carried out. The <Lease gives the NPS too much discretion.

A further concern is that the Lease only requires one visit by NPS staff to the ranches per year, along with the other specified visits to count AUs and to monitor residual dry matter. The NPS should be required to make more oversight visits. Also, the Lease It provides that Lessee “shall,” correct accidents of AU numbers, but if RDM standards are not being met, NPS imposing adjustments is discretionary. RDMN compliance should also be required.

Issues of Concern

We have identified certain activities that would result in adverse impacts that have not been addressed or are not addressed adequately. Approval of a Management Plan and EIS should be delayed until analyses adequate to understand the impacts are completed. Areas of inadequacy include:

1. Environmentally Sensitive Habitat Areas (ESHA).
Streams in the project area support Coho, Chinook and Steelhead, and other special status species that could be impacted by activities allowed by the Plan. Yet ESHAs are not identified, their habitat characteristics and species use is not discussed, and how their habitat will be protected or impacted are not addressed. It is acknowledged that stream water quality and sedimentation would occur, even though. It is also acknowledged that some streams would not be protected from grazing impacts: “Nearly all streams potentially occupied by salmonids would be excluded from grazing.” EDSHAs should be identified and described; how many miles of ESHA streams would be vulnerable to the impacts of grazing should be presented and how the adverse impacts would avoid or significantly reduced should be described.
2. Ecosystem impacts of water use.
Impacts on the ecosystem of diverting water for agricultural uses are a critical issue that is not addressed. The Plan states that the annual water consumption for beef

and dairy ranches totals 32 million gallons to 77 million gallons per year. This is a reduction from the quantity stated in the Draft Management Plan and EIS, which was 50 million gallons to 124 million gallons per year. No reason is given for the substantial reduction. In either case, this is a massive amount of water to be lost to the ecosystem, lost to streams, fish and other wildlife annually. And the amount diverted will increase with more farm animals and more home stay rentals. The quantity of water that would be expected to be diverted for the diversified activities should be calculated and presented. (We understand crops are not permitted to be irrigated.) Adverse impacts on ecosystem resources of removing this massive quantity of water should be addressed.

There are requirements for monitoring appropriated water use in the Lease (Section 2.4). The NPS holds water rights, and allocates rights to use water to Lessees, as we understand. There should be more information about these water rights. How much water do ranches generally have a right to take? How much additional water will be allocated for diversified activities? How will the quantity be determined for water to serve the diversified activities that have not yet occurred? Is there a limit to the quantity? Is there a provision that ensures the water needs of native wildlife, particularly endangered fish and frogs, are met? What about dry years, is water required to be left for natural resources? How will water use be considered when approving permits for grazing and diversified activities? The lease does not appear to take water needs of the natural systems into consideration. This should be a primary concern in a National Park.

3. Tule Elk

Under Alternative B, Tule elk would be limited in number and pushed to locations away from grazed areas. This effort appears to be to protect six ranches. The NPS should provide a movement corridor for elk and other wildlife to access the wilderness area. The NPS should prepare a Plan for properties to be protected in the future as a result of attrition. Ensuring access to usable habitat for elk should be a central component for determining ranches that would be restored to natural habitats.

4. Diversification

Native wildlife (fox, bobcat, coyote, ravens, crows and others) will be attracted to the small farm animals that are permitted under provisions for diversification. While the chickens, goats, sheep and hogs are required to be housed in shelters, shelter structures are not a foolproof protection against wildlife. Lethal controls are prohibited by mitigation measures and in the lease but it is unclear how this would be enforced. It is unlikely depredation would be observed, particularly with so few visits.

Lease/permit Section 12.1 acknowledges that there will be impacts of diversification states, "Except for ranching, diversification, residential and maintenance activities authorized in the ROA, Lessees shall not engage in any other activities that impact wildlife ..." and "...on a case by case basis, and at its sole

discretion, Lessor may evaluate incidents of depredation and choose a course of action." So even if depredation is observed or otherwise known, it is possible or likely that no action will be taken and any is discretionary. Mitigation measures also prohibit lethal methods for wildlife control. While most of the ranchers will comply it must be acknowledged that some may not. The Management Plan/EIS reports ranches that have exceeded the number of allowed AU. With limited on-site NPS observations and uncertain follow-through, whether or not depredation would even be known, or considered, much less stopped or penalized is not at all clear.

Diversification allows growing silage. Eggs and nestlings are destroyed by equipment harvesting silage. An earlier version of the Lease restricted harvesting until after nesting season. This has been removed from the current Lease so that now birds will continue to be killed. Unless harvesting is timed to avoid nesting season, bird eggs and young will be killed. Is this approved under the mantle of diversification?

5. Monitoring and enforcement inadequate.

The Ranch Operations Agreement requires only one annual meeting by NPS and ranchers and only one annual meeting by NRCS staff. It is unclear whether unscheduled visits apart from monitoring AU and RDM can even take place. Compliance with NRCS standards and mitigation measures primarily depend on ranchers voluntarily complying. Non-compliance has occurred as shown in NPS's reports in the EIS. Specifically how non-compliance with required limits on the number of cattle, is noted.

Appendix F lists Practice Standards and Mitigation Measures. The Practice Standards are those of NRCS. NRCS holds an easement on one of MAS's properties so we are familiar with NRCS management. While the Practice Standards do benefit natural resources, wildlife benefits are secondary to their main purpose. We think the standards for a National Park should be more proactive in protecting and enhancing natural resources.

Some comments on specific Practice Standards/Mitigation Activities are below:

- (Page F-54) Silage harvest is exempted from mowing restrictions during nesting season. Silage harvest during nesting season has been observed to result in the destruction of eggs and nestlings and should not be allowed in a National Park.
- (Page F-55) A 35-foot buffer between wetlands and mowed areas may not be sufficient to protect the stream water quality from sediments unless the buffer is very well vegetated and topography flat.
- The peak of the nesting season is later than mid April. Mowing should be avoided until nesting season is over.
- (Page F-59) Sheep and goat grazing should be prohibited on steep slopes due to the risk of erosion. Goats in particular will eat all or most of the vegetation. What constitutes a Steep Slope should be defined.
- (Page F-60) Observed and suspected interactions between livestock and wildlife must be reported and lethal control is prohibited. There should be a discussion

about the options that are available in such situations, particularly if they persist. What tools are available? Policies and practices should protect wildlife. We are concerned that if the Tule elk – ranch interaction is any indication, native wildlife will not come out on top. Will the NPS be willing to require diversified activities ended if problems persist?

To ensure effective compliance, the Plan must have clear standards and consistent monitoring and enforcement with penalties as needed for defaulting on requirements. Conditions of the lease should provide for and require the NPS to conduct regular monitoring visits to check on Lease conditions. Five new staff persons are estimated to be needed to implement the Management Plan. Funding for two staff has been approved. They should be dedicated to addressing natural resource protection.

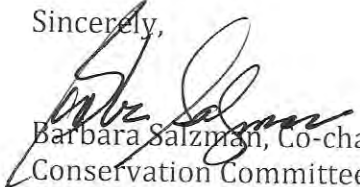
Finally, we did not see a mention of public review beyond this Management Plan review. Leases, ROA and ongoing compliance and negotiation in this National Park should be open for regular and scheduled public review.

Conclusion

In conclusion, it is clear that the primary intent of the Management Plan is to continue ranching. There are many questions and, while some conditions might improve some conditions, it is also clear that some impacts on wildlife and natural resources would not improve and could worsen. We look to the Coastal Commission to ensure that the diverse natural resources of this National Seashore are protected and enhanced. The Commission should require additional analysis and not find the Plan to be consistent with the Coastal Zone Management Act or Program.

Thank you for your attention to our concerns and issues.

Sincerely,


Barbara Salzman, Co-chair
Conservation Committee


Phil Peterson, Co-Chair
Conservation Committee

From: Don Forman <donf1@comcast.net>
Sent: Monday, December 14, 2020 6:27 PM
To: Coastal Point Reyes Management Plan <PointReyesManagementPlan@coastal.ca.gov>
Cc: Weber, John@Coastal <john.weber@coastal.ca.gov>; [Carey feierabend@nps.gov](mailto:Carey_feierabend@nps.gov)<[Carey feierabend@nps.gov](mailto:Carey_feierabend@nps.gov)>; [Craig Kenkel@nps.gov](mailto:Craig_Kenkel@nps.gov)<Craig_Kenkel@nps.gov>
Subject: Point Reyes National Park

I have been going out to PRNP for years. I would recommend that the park be returned to the people and remove the ranches.

If you go out to the park you will see cows walking in streams. While they are in the streams they are pooping and peeing. That ends up as you can guess into the ocean. The ocean and tamales bay is highly contaminated with cow waste.

The ground / soil around the ranches looks like the moon surface.

When most tourists go to PRNP they come to see wild life. Not cows.

Also, most of the dairy owners bought ranches out of the park when they sold their property. So if the ranches were closed down they would still have ranching, just not at the park.

With the elk fences up some of the elk get trapped and can't get water and die.

The dairy and farming is being phased out around the country.

Don Forman

From: Craig Downer <ccdowner@aol.com>
Sent: Monday, December 14, 2020 4:14 PM
To: Coastal Point Reyes Management Plan <PointReyesManagementPlan@coastal.ca.gov>
Cc: Weber, John@Coastal <john.weber@coastal.ca.gov>; Carey feierabend@nps.gov<[Carey feierabend@nps.gov](mailto:Carey_feierabend@nps.gov)>; Craig Kenkel @nps.gov <Craig_Kenkel@nps.gov>; Ryan olah@few.gov<Ryan_olah@few.gov>; Craig Downer <ccdowner@aol.com>
Subject: Comment on Tule Elk Plan for Point Reyes, National Seashore due Friday, Dec. 18, 2020

December 14, 2020

Point Reyes , Supervisor P.R. Management Plan Team
Point Reyes National Seashore

Dear Sir/Mame:

As a wildlife ecologist and naturalist, I love to spend time in Point Reyes Nat. Seashore where I observe many species including the majestic Tule Elk. But my enjoyment of the magical natural island of sanity is being terribly impeded along the coast by many miles of livestock fencing and I see many cattle and encounter much barbed wire. I love going to the beaches that are especially exciting and provide many opportunities to observe active wildlife. I have been doing this since I was a student at Cal Berkeley.

Cattle feces have become a big problem and is a source of disease transmission. It's not the cattle's fault, but us people's. We concentrate them in too great densities and upset Nature's balance. These intensively clustered dairy cattle are also increasing erosion and together with their feces this is affecting the vibrant intertidal ecosystem. The Tule Elk on the other hand could integrate very harmoniously if we allowed the natural selection and self-limitation of the herd to take place including via natural predators such as the Puma.

Finally the large dairy barns clash with the traditional landscape and mar my experience of this what-should-be-lovely place of respite and revitalization.

I and others I represent look forward to your thoughtful response.

Happy Holy Days and Bright New Year!

Craig C. Downer,
Andean Tapir Fund P.O. Box 456 Minden, NV 89423

From: Judith G <judithrachelleg@gmail.com>
Sent: Monday, December 14, 2020 2:48 PM
To: Weber, John@Coastal <john.weber@coastal.ca.gov>
Subject: Please save my park & the wildlife!

I am a swimmer in Tomales Bay. Many days I can't swim since it is closed due to pollution from the cattle run off. I see stinky cows, not elk and other wildlife when I visit the park. This is not right!

- My coastal access is being blocked by hundreds of miles of cattle fencing, barbed-wire, and herds of cattle. There is so little access to the beaches, even though this is public land.
- The water pollution is severe, and sometimes all the cow manure stinks. I see it getting into the creeks, and sometimes the park service closes beaches because of manure pollution.
- The historic character of the farming at the seashore is marred by new industrial dairy barns, which are modern, not historic, and block vistas of the natural coast.
- I came to see wildlife, native tule elk, elephant seals, whales, salmon runs, and lush coastal prairies with wildflowers. What I see are too many cattle, manure piles, ugly barns, bare ground, and erosion. All this erosion and manure pollution is likely harming coastal marine life. This is not sustainable or furthering the mission of the Coastal Commission.

--

♥ Judith Gottesman, MSW ♥
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 510.418.8813

Here's what clients say about me:
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Love is at the root of everything; love, or the lack of it. - Mr. Rogers

Until people extend their circles of compassion to include all living beings,
 they will not find peace. - Albert Schweitzer

From: Jaipreet Kaur <ompeace28@aol.com>

Sent: Monday, December 14, 2020 3:28 PM

To: Coastal Point Reyes Management Plan <PointReyesManagementPlan@coastal.ca.gov>

Cc: Ryan_olah@few.gov <Ryan_olah@few.gov>; Weber, John@Coastal <john.weber@coastal.ca.gov>; Carey_feierabend@nps.gov <Carey_feierabend@nps.gov>; Craig_Kenkel@nps.gov <Craig_Kenkel@nps.gov>

Subject: Regarding the elk

Hi

I'm a marin resident.

1. My coastal access is being blocked by hundreds of miles of cattle fencing, barbed-wire, and herds of cattle. There is so little access to the beaches, even though this is public land.
2. The water pollution is severe, and sometimes all the cow manure stinks. I see it getting into the creeks, and sometimes the park service closes beaches because of manure pollution.
3. The historic character of the farming at the seashore is marred by new industrial dairy barns, which are modern, not historic, and block vistas of the natural coast.
4. I came to see wildlife, native tule elk, elephant seals, whales, salmon runs, and lush coastal prairies with wildflowers. What I see are too many cattle, manure piles, ugly barns, bare ground, and erosion. All this erosion and manure pollution is likely harming coastal marine life. This is not sustainable or furthering the mission of the Coastal Commission.

Best

Sara Kaur

December 11, 2020

Larry Simon
Manager, Federal Consistency Unit
Energy, Ocean Resources and Federal Consistency Division
California Coastal Commission
455 Market Street, Suite 228
San Francisco, CA 94105-2219
(415) 904-5288
larry.simon@coastal.ca.gov

CC: John.Weber@coastal.ca.gov
PointReyesManagementPlan@coastal.ca.gov

Re: National Park Service Consistency Determination for General Management Plan Amendment/Final Environmental Impact Statement for Point Reyes National Seashore and north district of Golden Gate National Recreation Area

Dear Mr. Larry Simon:

These are comments of the Center for Biological Diversity and Turtle Island Restoration Network (TIRN) on the National Park Service (NPS) Consistency Determination (CD) for their Preferred Alternative from their General Management Plan Amendment/Final Environmental Impact Statement (GMPA/EIS) for the Point Reyes National Seashore (PRNS) and the north district of Golden Gate National Recreation Area (GGNRA).

The Center is a nonprofit conservation organization with more than 1.7 million members and supporters, dedicated to the protection of native species and their habitats through science, policy, and environmental law. The Center has expertise on protection of endangered species, cattle ranching impacts on the environment, management of federal public lands, and implementation of federal environmental protection laws. The Center has been working to protect native wildlife and other environmental resources of the Bay Area for more than two decades. Many Center members, supporters, and staff have a longstanding interest in preserving endangered species, tule elk and other native wildlife, and natural ecosystems of Point Reyes National Seashore and the GGNRA. Center staff in the Bay Area have been visiting PRNS for up to 50 years, and have been involved in tule elk reintroduction, salmon restoration, and endangered species protection efforts in PRNS and the GGNRA over the past two decades. Center staff and members have spent hundreds of hours in the PRNS and the GGNRA ranching areas observing wildlife and documenting the conditions of ranchlands.

TIRN is a nonprofit conservation organization with its principal place of business in Olema, California, located on Golden Gate National Parkland. TIRN has more than 200,000 supporters worldwide, with about 1,500 located in Marin County. TIRN has expertise on federal environmental protection laws and protection of endangered species, particularly with respect to endangered and threatened oceanic species and endangered and threatened salmonids in West Marin. TIRN has a 30-year history of protecting, conserving and restoring habitat in the entire Lagunitas Creek Watershed. TIRN has been working on issues related to sensitive species protection and environmental protection laws since its inception in 1987 (originally named the Sea Turtle Restoration Project).

The NPS has submitted to the Coastal Commission a misleading and incomplete Consistency Determination (CD) for their Preferred Alternative (B) from their General Management Plan Amendment/Final Environmental Impact Statement (GMPA/EIS) for the Point Reyes National Seashore and the north district of Golden Gate National Recreation Area.

The submitted CD reviews their Federal Agency Activity (NPS General Management Plan proposed amendment) and their Federal Agency Development (improvements to ranch buildings and other structures). The Coastal Commission must rigorously review the Federal Activity and Development in the CD against each of the Objectives in the California Coastal Act, particularly the enforceable policies located in Chapter 3 of the California Coastal Act (CCA). For the CD to be accepted, it must be consistent with all of the Objectives “to the maximum extent practicable.”

Although the NPS lands in this proposed GMP amendment are legally excluded from the California Coastal Zone, the impacts from the proposed activities and development under the Preferred Alternative will affect downstream and nearby coastal zone resources and public visitors to the Coastal Zone, so that a CD review is required. Under Section 307(c)(1) of the CZMA, 16 USC Section 1456(c)(1), federal activities that affect any land or water use or natural resource of the coastal zone are required to be consistent with the affected state's coastal management program to the "maximum extent practicable." Section 930.32 of the National Oceanic and Atmospheric Administration's regulations implementing the CZMA (15 CFR part 930) defines "consistent to the maximum extent practicable" as follows: (a)(1) The term “consistent to the maximum extent practicable” means fully consistent with the enforceable policies of management programs unless full consistency is prohibited by existing law applicable to the Federal agency.

Despite NPS assertions to the contrary, the Preferred Alternative (identified as Alternative B in the GMPA/EIS or plan) is not consistent to the maximum extent practicable with the California Coastal Management Program. Alternative B would allow significant new development, uses, and activities at PRNS and GGNRA, including expanded and new agricultural uses and intensity, and new commercial and retail activities and facilities. The GMP amendment substantially increases the number and intensity of activities at the 24 ranches in the park by adding small

livestock, crops, visitor B&B stays, retail sales of agricultural products, meat and cheese processing facilities, and camping. These activities will continue and worsen damage and impacts to soils, water quality, coastal grasslands, wildlife, sensitive plant species, scenic resources, and visitor aesthetics.

The GMP amendments propose to allow the intensification of land uses on 24 ranches on 18,500 acres in PRNS and on 10,000 acres in the GGNRA, currently under agricultural leases for beef cattle and dairy grazing. The NPS Preferred Alternative B will increase the acres dedicated to ranching in the parks by 7,600 acres, and allow: a new commercial land use, Small Retail, for stores and stands for agricultural products; a new industrial land use, Ag Processing, for small cheese factories, and slaughtering livestock; hostels, tent cabins, farm stay rooms, and various camping accommodations; housing and offices for volunteer organizations; other adaptive reuses of ranch buildings; horse boarding; up to 2.5 acres of row crops per ranch; and small livestock (40-70 sheep, goats, or pigs and up to 500 chickens per ranch).

The GMP amendment would treat native tule elk at PRNS, the only national park where they occur, as problem animals to be killed or hazed. It authorizes additional and expanded agricultural uses which are sure to cause further conflicts between ranching operations and native wildlife. The preferred alternative would enshrine long-term private cattle ranching as the primary use of a huge swath of PRNS and GGNRA, to the detriment of native wildlife and natural habitats. The preferred alternative would do very little to prevent harm to endangered species and other native wildlife, degradation of water quality, soil erosion, and spread of invasive species from cattle grazing and ranching activities. The mitigation measures proposed under alternative B are inadequate to offset the negative impacts from livestock grazing and ranching activities.

The NPS has available an alternative that is consistent to the maximum extent practicable with the Coastal Act. The GMP amendment dismissed the only alternative (F) that would conserve the natural history of the parks and manage PRNS and GGNRA in the public interest. Only alternative F is consistent to the maximum extent practicable with the Coastal Act and the enabling legislation for the parks, the Organic Act, Point Reyes Act, and GGNRA enabling legislation.

The proposed NPS Federal Activity in the CD is not “consistent to the maximum extent practicable” with several mandates of the California Coastal Act. We urge the Commission to object to this submittal.

Soils

Neither the CD nor the EIS discuss the extensive soil erosion and soil compaction problems that currently exist in the planning area due to cattle grazing. The EIS notes grazing impacts on stream incision, but does not discuss the full extent of stream incision problems in PORE and

GGNRA.

The EIS acknowledges that Alternative B would have long-term, adverse impacts on soils from livestock trailing, trampling, erosion, and compaction; and also from ranching activities such as diversification, vegetation management, forage production, and manure spreading. Cattle also contribute to the introduction of intensive weeds which can crowd out native plants. The diversification of ranching activities to include livestock like sheep, goats, pigs and chickens will likely cause unknown adverse impacts to soils which were not adequately addressed in the GMPA/EIS. Chronic overgrazing by cattle that is visible on many of the PRNS ranches was documented in a 2015 rangeland condition report by U.C. Berkeley for PRNS (Bartolome et al. 2015). The 2015 report showed that 33% of the grazing transects studied were below the minimum 1,200 RDM for the years 2012-2014.

The Resource Protection sub-zoning would only protect an additional 5% of soils with high erosion potential and 3% of soils with high compaction potential from grazing impacts. The EIS claims that "management activity standards" and mitigation measures are "expected" to reduce overall impacts on soils, but does not clarify whether they would reduce impacts to less than significant levels.

The preferred alternative notably advocates for culling of Tule Elk, who are named for the grasses they depend on and evolved in tandem with. The way the Tule Elk graze helps spread and protect the tule grass, which in turn helps the grass hold rainwater and stabilize the soil against erosion.

Only Alternative F would have noticeable, long-term benefits on soil resources: decrease in erosion rates and runoff, soil stabilization, and decreased soil compaction. Soil erosion, runoff, nutrient levels and compaction would return to natural conditions, and it would be more conducive to establishment of native vegetation communities.

Water Resources

The CD and EIS acknowledge the severe impacts to surface water quality from livestock grazing and dairy operations, and that the main sources of water quality degradation are potentially pathogenic bacteria and nutrient loading from nonpoint sources associated with ranches and dairies.

An NPS 2013 Coastal Watershed Assessment for Point Reyes National Seashore documented cattle ranching pollution of water resources in the park and identified bacterial and nutrient pollution from dairies and ranches as a principal threat to water quality. Of the 6 dairies at PRNS, the NPS found "severe pollution" at 5 of them. The Park Service's assessment determined that dairies pollute the Drakes Estero, Limantour, Kehoe and Abbots Lagoon areas with high

concentrations of fecal coliform. Other studies show that cattle ranches are one of the major contributors of fecal coliform and *E. coli* to Tomales Bay.

Water-quality monitoring data from 2012-2017 submitted by NPS to the Water Quality Portal (compiled by the U.S. Geological Survey, Environmental Protection Agency and National Water Quality Monitoring Council) show that some waters of PRNS rank in the top 10 percent of U.S. locations most contaminated by feces, indicated by *E. coli* bacteria. High fecal coliform readings reported by NPS came from wetlands and creeks draining ranches in the Kehoe Beach area of PRNS. Eight locations in the Olema Valley that receive runoff from cattle ranches within the GGNRA also stood out for high fecal bacteria levels. The Center for Biological Diversity mapped the highest *E. coli* test result for every available water testing location in the country submitted to the Water Quality Portal, from October 2012 to October 2017. PRNS stood out as one of the 10 most feces-contaminated locations monitored in California since 2012; and the state's highest reported *E. coli* level was on a Point Reyes cattle ranch (CBD 2017).

The EIS discusses impairment of the Tomales Bay watershed, Lagunitas Creek and Olema Creek for nutrients, pathogens, and sediment/silt, exceedances of TMDL for potentially pathogenic bacteria, and elevated nutrient, suspended solids, and turbidity levels; and acknowledges these pollutants are in part due to grazing (cow manure washes into local streams, contaminating surface waters with fecal coliform). The EIS discusses the high concentrations of total suspended solids and nutrients flowing into Drakes Bay and Drakes Estero from ranches. The EIS notes that in Abbotts Lagoon and the Kehoe drainage that tributaries draining dairy operations or dairy grazing land have the highest nutrient levels or loading rates, and significant problems with excessive nutrients, sediment, and potentially pathogenic bacteria. The DEIS discusses impacts on water quantity due to the huge volumes of water used for livestock, conservatively estimated at 50 to 124 million gallons per year. The GMPA/EIS does not adequately analyze and account for the increased water pollution associated with diversified ranching operations, particularly the potential to introduce species like pigs in ranching operations.

The EIS acknowledges that Alternative B would have significant adverse impacts on water resources due to continued pollutant loading (manure, bacteria, pathogens, nutrients, sediment/turbidity), changes in nutrient levels, disturbance to surface waters, releases of other agricultural and mechanical pollutants, increased soil erosion, and excessive use of water.

The EIS claims that the Resource Protection sub-zoning, exclusion fencing, management activity standards and mitigation measures would "minimize" ranching impacts on water quality or quantity.

Water quality impacts will place additional stress on endangered salmonids in the area, and while briefly addressed in the EIS, this issue is not adequately mitigated in the GMPA to ameliorate the negative effects it poses to endangered salmonids.

Only Alternative F would have long-term, beneficial impacts on water quality and quantity; it would reduce water use by an estimated 50-124 million gallons per year.

Vegetation

The EIS acknowledges extensive damage to wetlands from cattle grazing, but focuses on protection of some wetlands in grazed areas by using fencing to control the timing and duration of grazing to reduce impacts to water quality and ecological function. The EIS does not discuss grazing impacts on unfenced and unprotected wetlands, and documented instances of failure of ranchers and the NPS to monitor and repair fences near wetlands.

The EIS fails to discuss grazing impacts and extensive damage to riparian areas from cattle grazing, instead focusing on the dramatic recovery of some park riparian areas following fencing out of cattle. The EIS does not discuss documented instances of failure of ranchers and the NPS to monitor and repair fences near riparian areas.

The EIS discussion of grasslands notes that nonnative plants dominate California Annual Grassland and Agricultural Pastureland in the planning area, but does not fully evaluate the role of cattle grazing and ranching in promoting, maintaining and spreading these nonnative plants. The EIS discussion of invasions of non-native plant species notes that the NRCA found that the “total number of invasive plant species and the number of new introductions are high enough to warrant significant concern” in the planning area. The EIS discusses the role of livestock in spreading invasive weeds, as well as via seed mixes, supplemental feed, imported soils, and equipment used in ranch operations. The EIS notes that concentrated livestock use can also increase exposed soil, providing favorable germination sites for weeds.

The EIS notes that coastal native prairie is a rare and diminishing ecotype, and that grazing has noticeably reduced and altered the coastal prairie. Coastal native prairie is in fact the most endangered natural ecosystem at PRNS. There is no discussion in the EIS of how to restore native prairie.

The EIS acknowledges that Alternative B would have significant adverse impacts on native vegetation, including defoliation, trampling, nutrient redistribution, perpetuation of altered vegetation structure, changes in species composition and biomass production, introduction and spread of invasive species, adverse effects from nutrients on native grassland plant species, trampling of wetlands and riparian areas, reduction in native perennial forbs, and mechanical treatment of shrubs. The rezoning associated with Alternative B to allow for future increase in ranching activities will further exacerbate all these effects. Cattle grazing under alternative B could have some beneficial or neutral impacts to some vegetation types and species, though this would be highly dependent on carefully managed cattle grazing regimes in which timing, duration, and intensity of grazing were monitored and controlled. NPS currently does not carefully manage, monitor or control cattle grazing in the planning area.

Proposed mitigations for vegetation impacts under alternative B include a new zoning framework intended to keep higher intensity activities in areas without sensitive resources. An additional 1,200 acres of resource protection exclusion areas would be created. Management activities such as using sufficient fencing and/or water troughs to improve cattle distribution, "could be implemented" to minimize adverse impacts on vegetation "to the extent possible." Other mitigations include range management guidelines, minimum RDM levels, and maintenance of exclusionary fencing.

Only Alternative F would eliminate the ongoing adverse impacts of ranching on vegetation in the planning area. The EIS notes that riparian areas and wetlands would benefit from the removal of livestock grazing. There would be an initial increase in abundance of native perennial forbs. Ranching operations would no longer be a pathway for the introduction and spread of invasive species. There would be a cessation of other ranching activities such as harvest mowing for forage production. Cattle grazing or trampling would no longer affect listed and rare plant species.

Removal of cattle could have some negative impacts for some native vegetation types. The EIS cites studies showing that removal of cattle grazing did not increase native species abundance or richness in grasslands, but these studies did not consider or include the positive impact of elk, as would be the case at PRNS. NPS has available a test case for removal of cattle grazing and reintroduction of elk at Tomales Point, where native plant species diversity and richness has become greater after removal of cattle and reintroduction of elk than in adjacent areas with continued cattle grazing. Also, alternative F would use limited prescribed cattle grazing and mowing to maintain some grasslands and control weeds, which could mitigate some of the adverse impacts of changes in grazing regimes. The EIS states that while overall, alternative F "would likely have both beneficial and adverse impacts on vegetation in the planning area, the limited use of prescribed grazing could mitigate some adverse impacts of removing the livestock operations."

Wildlife

The EIS notes significant impacts on native wildlife in the planning area from livestock and ranching operations: mammals are subject to disturbance, competition for resources, habitat alteration, fences, and domestic cats; ground nesting birds are susceptible to impacts from cattle grazing and vegetation management such as plowing, harvesting and mowing; agricultural operations attract and unnaturally elevate populations of corvids, starlings and cowbirds, with significant predation and dislocation impacts on native birds; agricultural activities contribute to habitat degradation and reduced water quality and quantity for fishes; and agricultural activities could affect habitat suitability and water quality for reptiles and amphibians.

Other than killing and hazing tule elk, there is no discussion in the EIS of measures to avoid ranching conflicts with wildlife.

Alternative B would result in trampling and soil compaction by cattle that could impact habitat for the American badger and Point Reyes jumping mouse, but the EIS claims there would not be population-level impacts. Small mammals would continue to be injured or killed by silage harvest mowing. Vegetation control would reduce coast scrub habitat for the rare Point Reyes mountain beaver. Alternative B would result in impacts to native mammals from habitat modification, food web alterations, changes in nutrient cycling, and disturbance. Forage production would impact mammals through mowing on 1,000 acres. Manure spreading would continue on 2,500 acres.

Alternative B would result in impacts to birds from spread of invasive species and livestock trampling of ground nests.

Mowing, harvesting silage, or occasional tillage during the nesting season could also destroy bird nests and eggs, kill fledglings, or cause adult birds to abandon their nests. A 2015 Point Blue report (DiGaudio et al. 2015) documented significant mortality and declines in grassland bird abundance and nesting at PRNS due to silage mowing. 1,000 acres of the planning area would still be subject to harvest mowing under alternative B. Under alternative B, mitigation measures to reduce wildlife mortality during forage mowing include conducting harvest mowing outside bird nesting season, mowing from inside the middle of a field toward the outside to increase likelihood for wildlife escape, using flushing bars on the mower to flush incubating birds and mammals before the mower reaches them, and not mowing at night when there would be higher wildlife mortality. The EIS does not detail how these measures will be implemented, monitored, or enforced.

Alternative B would continue to promote an unnatural abundance of corvids, starlings, and cowbirds that compete with, prey upon, and parasitize nests of native birds, resulting in continued impacts to birds over the long term. Alternative B could have some positive impacts and maintain habitat for grassland birds that prefer short grass or bare ground.

Wildlife-friendly fencing would be required under alternative B to reduce mammal entanglements and bird strikes, and to allow wildlife movement. Ranchers would be required to remove and dispose of abandoned fences and barbed wire, something which has not been adequately enforced in the past.

Alternative B would result in the degradation of habitat for salmonids. Nearby creeks support the largest run of Central California Coast coho salmon in the state, and the continued agricultural operations, possible increase of agriculture in the future due to zoning changes, and diversification of ranching operations will all likely increase the already significant water quality impacts to nearby coastal streams, further imperiling these endangered species.

Alternative F, the elimination of livestock grazing, would have the most positive benefits for native mammals, birds and fish, due to cessation of cattle impacts, silage mowing, manure spreading, vegetation control, subsidizing of predators, and water quality benefits. It could have some negative ecological impacts for some native wildlife because the primary disturbance regime to which mammals and birds have adapted for more than 150 years would be removed.

Tule Elk

The GMP amendment will institute ongoing lethal removal (shooting) of tule elk so as to be “compatible with authorized ranching operations.” The CD falsely claims that the Preferred Alternative “would preserve and improve habitat for the park’s free ranging tule elk herds” when in fact Alternative B will authorize killing elk to meet an arbitrary population cap on the Drakes Beach elk herd and to prevent the establishment of any new elk herds in the park. The elk culling has no ecological basis or justifiable management purpose, other than to expand and prioritize commercial agricultural uses of park grasslands. The CD does not even mention the proposed killing of tule elk.

The EIS notes that the tule elk at Point Reyes are believed to be among the most inbred in California, but does not discuss any methods, solutions or efforts to counteract this or improve the genetic variability of the Point Reyes herds.

The EIS discusses Johne’s disease, but does not acknowledge that cattle, particularly in confined dairy conditions, are a known vector of this disease, nor does it discuss the primary route of transmission, which is from cattle to elk, rather than from elk to cattle. The NPS 1998 Tule Elk Management Plan discloses that in 1979 half of the dairy herds in PRNS tested positive for Johne’s. NPS has done nothing in the 40 years since then to deal with Johne’s disease in the dairy herds, yet it lethally tests elk. The spread of Johne’s to wildlife, including elk and potentially other wildlife, could be impairing the natural resources of PRNS.

Some of the methodology and assumptions in the EIS regarding tule elk are flawed. The DEIS evaluates impacts of the alternatives on elk based on their overall effect on elk population size and herd viability. The EIS concludes that any actions that would reduce the population of an individual elk herd in the planning area below a minimum threshold for a viable herd of 100 elk (purported to be based on CDFW 2017 and 2018) would have adverse effects on elk over the long term. Alternative B proposes arbitrary minimum and maximum population sizes for the Drakes Beach elk herd of 120 elk. The NPS falsely claims this is based on “guidance” from the California Department of Fish and Wildlife (2017, 2018) Elk Conservation and Management Plan. Yet this CDFW elk plan contains no such guidance on maximum or minimum population size. In fact, the state’s elk plan explicitly acknowledges that CDFW has no idea what constitutes minimum population viability (MPV) for elk herds and states “it is beyond the scope of this management plan to validate a specific PVA approach or independently estimate MVP size for

tule elk” (see discussion pages 27-31 of the elk plan). The CDFW elk plan does reference minimum population viability size estimates for elk by the U.S. Forest Service, which range from 1,500 elk on the Salmon National Forest to 3,000 elk on the Gallatin National Forest, way more than the 120 elk proposed in alternative B.

The EIS fails to explain the science or ecological rationale behind the arbitrary 120 Drakes Beach elk goal, and explain why a maximum population threshold is needed for the Drakes Beach elk herd. There is no ecological justification for limiting the size of this elk herd. The EIS acknowledges that under no scenario are elk expected to exceed the park’s carrying capacity in the near future.

Because Alternative B establishes a threshold of 120 adult elk in the Drakes Bay herd and the fact that the herd currently numbers 138 elk, the NPS would kill at least 18 elk this year. Alternative B would allow lethal removal of 10 to 15 adult elk from the Drakes Beach herd annually. Removals would target suspected diseased animals, older reproductive females, and prime bulls. There is no discussion in the EIS what the population demographic and genetic fitness implications would be from continuously removing older reproductive females and prime bulls from this herd.

Alternative B would artificially limit the geographic extent of the Drakes beach herd using hazing techniques. There is no discussion in the EIS what the impacts of this would be during years of extended drought and reduced forage availability for elk. The EIS acknowledges that hazing elk is not a very effective method to keep male bachelor groups off of ranchlands.

Alternative B would also allow hazing and lethal removal for the Limantour elk herd, to manage the herd’s geographic extent if individuals establish outside the core use areas or to address "localized impacts." The EIS does not explain what these localized impacts are, but they are presumably impacts to private ranching operations, not park resources.

Wildlife-friendly fencing would be required under alternative B, and more lowered elk crossings “could” be installed in the areas frequented by the Drakes Beach and Limantour herds, which could reduce the risk of injury to elk compared to existing fencing conditions, which are documented to injure and kill elk.

Alternative B would continue Johne’s disease monitoring and testing for elk, but not for cattle at PRNS, a primary vector of this disease. The EIS does not disclose whether lethal testing of elk for this disease will continue under alternative B, nor the numbers of elk that would be killed annually under the guise of testing for a disease which NPS has no intention of managing in the PRNS dairy cattle herds.

Only under alternative F would Point Reyes elk be free of persecution and killing. Both the population and geographic extent of elk would increase in Point Reyes. The fence at Tomales

Point would be removed and all elk in the park would be free roaming, able to find food and water even during drought conditions. Ranching activities would not disturb elk and cattle would not compete with elk for forage because ranching would be discontinued. Without population control, the free-range elk population could grow to as many as 2,000 individuals over a 20-year period. This would be a desirable condition in the only national park where these elk occur.

The Tule elk are particularly beloved to those of us residing and working in West Marin. These elk represent the lost history of wildlife brought back from the brink of extinction, similar to the American buffalo. By the 1870's, white colonists in California had hunted them down to less than 10 individual animals. Now, one of the largest populations of Tule Elk in the state lives in Point Reyes National Seashore, so the thought of intentionally killing these iconic animals is emotionally distressing to West Marinites.

Listed and Sensitive Species

Beach Layia

The EIS notes that cattle directly affect Beach layia through trampling, as well as indirectly via increased weeds associated with grazing disturbance. Livestock trampling was indicated as a threat when beach layia was listed under the ESA. The EIS acknowledges that since 2004, the beach layia population in PRNS has declined 84% - from an estimated 35,893 plants in 2004 to 5,689 plants in 2018 - and that beach layia occurrences subject to grazing have declined in abundance an unspecified amount since 2004. Beach layia populations in dunes at PRNS are subject to trampling by cattle loafing in the dunes.

Alternative B proposes avoidance and mitigation measures to protect beach layia which rely on exclusions and effective and maintained fencing. The EIS acknowledges current adverse impacts from grazing on approximately 20% of known beach layia occurrences, but presumes that zoning would reduce that because 12% of the layia population would be protected by new resource protection exclusion areas on the E and F ranches. This would eliminate the potential effects of cattle trampling on all but 8% of known beach layia occurrences in the Range subzone. The EIS acknowledges that although cattle would be excluded from areas supporting nearly 90% of all known beach layia occurrences in the park, they could occasionally breach pasture fences and trample beach layia in protected coastal dunes. This could occur as a result of broken fences, gates being left open, or the poor siting of pasture fences in sandy areas.

Sonoma Alopercus

There are only 20 occurrences of Sonoma alopercus remaining in the world. At one point, there were 10 Sonoma alopercus populations in PRNS, but 4 have been extirpated leaving 6 of the 7 existing populations of this species in the park. Trampling and grazing by cattle has been one of the factors for decline of the species. One population in the planning area was reduced by 90%

in 2001 after cattle were released onto the site. Grazing can result in trampling of individual plants, soil compaction, and influence the presence of competitive invasive species. Heavy grazing of this plant can also limit its ability to photosynthesize, which could result in death or diminished reproductive output.

Conversely, some grazing regimes may be beneficial and necessary to maintain Sonoma alopecurus in the face of competition from other plants. NPS monitoring of Sonoma alopecurus in the action area suggests that it thrives in wetlands that are grazed just enough to reduce competing vegetation. “Moderate-intensity” grazing would reduce competition from more abundant native plants or non-native species. Seasonal grazing appears to result in more Sonoma alopecurus inflorescence production than no grazing or year-round grazing.

Alternative B proposes mitigation measures for Sonoma alopecurus, including instituting seasonal grazing on the AT&T Ranch and seasonal exclusion of grazing around Population 5 near Abbotts Lagoon. The NPS claims it would use ROAs to direct the appropriate timing, intensity, and duration of grazing. Fence construction around populations would allow cattle to be excluded in the spring and summer to avoid impacts to plants during active growth, flowering, and seed-set. Adherence to RDM standards is supposed to ensure moderate grazing. NPS states it would monitor populations and coordinate with ranchers to adjust grazing if there are any documented adverse effects in pastures. The EIS acknowledges that the extent of cattle grazing that is advantageous for Sonoma alopecurus is unknown and so the potential for inappropriate cattle grazing would still exist.

Tidestrom’s Lupine

The EIS notes that cattle grazing has been associated with the extirpation of Tidestrom’s lupine elsewhere in Marin County. In the planning area 85% of occurrences of Tidestrom’s lupine are in areas “largely excluded” from cattle grazing. For 15% of the remaining occurrences, cattle currently directly affect the plants through trampling and indirectly affect them via increased weeds associated with grazing disturbance. Trampling by livestock was the cause of some plants at PRNS going from a reproductive to non-reproductive state.

Alternative B proposes mitigation measures for Tidestrom’s lupine, including a new 67-acre resource protection exclusion area on the F Ranch intended to protect all known Tidestrom’s lupine occurrences that are potentially impacted by grazing under existing conditions. The EIS acknowledges that a small number of Tidestrom’s lupine occurrences could be negatively impacted if cattle breach pasture fences and loaf in coastal dunes. Cattle trespassing in coastal dunes could occur if pasture fences are poorly sited, inadequately maintained, or if gates are left open.

Other Sensitive Plant Species

The EIS states that other rare and special-status plant species would continue to be adversely affected by cattle grazing or trampling, including coastal marsh milkvetch (*Astragalus pycnostachyus*), swamp harebell (*Campanula californica*), Point Reyes ceanothus (*Ceanothus gloriosus*), Marin checker lily (*Fritillaria lanceolata* var. *tristulis*), North Coast phacelia (*Phacelia insularis* var. *continentis*), and Point Reyes checkerbloom (*Sidalcea calycosa* ssp. *Rhizomata*).

Western Snowy Plover

The negative impacts of cattle grazing and ranching activities on snowy plovers at PRNS are well documented and discussed in the EIS. The biggest impact is from unnatural elevation of populations of common ravens near snowy plover beaches, which increases predation upon snowy plover eggs and chicks. Large raven populations are subsidized by ranch activities that provide food sources, such as livestock feeding and forage mowing that kills birds and small mammals, attracting ravens.

There are also direct impacts to plovers from cattle, including disturbance to birds or trampling of nests and crushing of eggs. The presence of cattle within nesting areas could also result in nest failure due to western snowy plovers being flushed from their nests for extended periods of time. The EIS acknowledges that livestock do escape pasture fences and trespass onto beaches and coastal dunes occupied by western snowy plovers, but “only rarely.” The Center has reported trespass cattle at PRNS within snowy plover nesting areas.

Under alternative B, the EIS claims that NPS would “continue to take actions to reduce feeding opportunities for ravens at ranches and dairies, such as covering feed troughs, cleaning up waste grain around troughs, removing and placing troughs in enclosed structures, and storing harvested crops in enclosed structures.” The EIS also states that “NPS has coordinated with ranchers to limit raven access to supplemental feed and shelter...and worked with ranchers to install covered feed bins.” However, large congregations of ravens can still be observed feeding at uncovered food sources at PRNS ranches and dairies. Every observation of forage mowing at PRNS has a large number of attendant ravens. The EIS admits that it is “uncertain whether alternative B would reduce indirect impacts of ravens.”

Alternative B proposes mitigation measures for western snowy plovers intended to reduce the attraction of ravens by ranches and dairies. These include inspection by ranchers of all pasture fences prior to moving cattle into a pasture, a highly unlikely scenario. ROAs would require annual fence maintenance, but how this would be enforced and whether maintaining on an annual basis would be adequate are not discussed. NPS has eliminated the existence of carcass dumps which attract ravens and the EIS claims NPS would find ways to ensure that afterbirths and dead livestock are disposed of quickly by ranchers, but does not detail how this

would be accomplished.

Under alternative B, where agricultural diversification is proposed to be allowed, NPS claims it would require methods to reduce feeding opportunities for common ravens at ranches and dairies, including requiring ranches to cover or remove feed troughs or place them in structures “where possible,” storing harvested crops in enclosed structures, and cleaning up waste grain around troughs. These are measure supposedly already in place for cattle which are not being complied with by ranchers and not monitored and enforced by NPS.

Listed Salmonids

The myriad of negative impacts from livestock grazing on salmonids and their habitat are well known and well documented, as discussed in the EIS and the NMFS 2004 Biological Opinion for PRNS and GGNRA. These include increased erosion, sedimentation, and suspended sediment; damage to riparian vegetation and streambanks; increased water temperatures; and adding nutrients, sediment, bacterial contaminants, and other pollutants into streams. These impacts could degrade habitat for listed salmonids in the planning area, including California coastal Chinook salmon, Central California coastal steelhead, and Central California coast coho salmon.

The EIS claims that these impacts are minimized due to adherence to RMD standards, grazing in riparian areas in grazed pastures that is managed for riparian health, fencing and topography which prevents livestock access to Olema Creek, Lagunitas Creek and numerous tributaries, and development of upland water sources which reduce livestock use of most intermittent streams.

Mitigation measures for salmonids under alternative B would include implementation of management activity standards in appendix D, and range management guidelines that minimize erosion and stormwater runoff. There would be new resource protection areas that would exclude cattle from approximately 2.4 miles of perennial streams in the Lagunitas and Olema Creek watersheds and 1.6 miles of streams in the Drakes Estero watershed. Fencing is expected to keep cattle out of salmonid-bearing streams, but habitat for salmon and steelhead could be directly affected if cattle breach pasture fences into excluded riparian areas.

Alternative B continues and will likely expand the well-documented already-occurring negative effects of ranching operations on endangered salmonid habitat.

Visitor Use, Experience, and Access

An estimated 2.3 million visitors come to Point Reyes National Seashore annually to watch the Tule Elk. The EIS acknowledges that the experience of park visitors who enjoy elk would be adversely affected by alternative B because the Drakes Beach herd would not be allowed to expand. The EIS claims that lethal control, i.e. shooting of elk in the most viewed free-roaming elk herd would somehow not affect visitor experience or enjoyment.

The EIS makes the unsubstantiated claim that viewing livestock and ranching operations brings visitors to the park. The DEIS provides no evidence or substantiation for this assertion, nor does it provide any context of what proportion of park visitors come to view native wildlife and intact ecosystems versus to see ranching operations. The EIS also notes that under alternative F visitors would no longer be able to “experience working ranches in the planning area” and claims that removing operating ranches “would eliminate a unique experience that the park currently provides.” Cattle ranching in the parks is in no way a unique experience. There are numerous working ranches surrounding PRNS and GGNRA, throughout Marin and Sonoma counties, many of which offer tours or farm stays. There is no loss to public use or enjoyment of the parks by removing these commercial activities, especially when they are ubiquitous in west Marin and Sonoma. The EIS acknowledges that under alternative F, NPS would continue to offer and possibly expand interpretive opportunities related to ranching history.

There is little meaningful discussion of ranching’s negative impacts on the public’s use or enjoyment of the park. The EIS cites electric fencing, interactions with cattle, and “manure management” as ranching operations which diminish the visitor experience; but fails to fully discuss the negative aesthetic impacts of the ranches and industrial scale dairy operations, including odors, lighting, noise, abandoned agricultural equipment, barbed wire, and trash. The EIS does not discuss the safety danger from ranching to park visitors, including potential trampling and injury from aggressive cattle and bulls, and road hazards and damage to roads from oversized farm equipment.

Alternative B would continue the practice of excluding the public from about one third of the parkland due to incompatibility with ranching operations, forcing visitors into designated areas. This is especially detrimental in the time of COVID, where the ability to social distance is paramount. The EIS also states that preserving ranches and ranch structures will benefit the public by providing “cultural resources,” but this completely ignores the culture of the original Miwok inhabitants, who were eliminated from the landscape by ranchers. Now, the Indigenous peoples of the Coastal Miwok tribe are confined to a small area while ranchers are given access to about one third of the National Park via leases and permits.

The EIS acknowledges that alternative F would be beneficial to visitor opportunities related to experiencing natural sights and sounds in the parks, and that the negative impacts of cattle and ranch operations on natural resources such as vegetation, wildlife, water resources, and air

would cease as the park is restored to a more natural environment. The EIS acknowledges that potential expansion of the elk population in Point Reyes under alternative F would result in long-term, beneficial impacts on visitor use and experience for visitors who enjoy observing elk in their natural and historical habitat, which is the vast majority of the American public and visitors to the park. The Drakes Beach and Limantour herd populations would increase, providing additional opportunities and new locations for visitors to view elk. In addition to the Drakes Beach and Limantour herds, the Tomales Point elk fence would be removed, and all elk would be free ranging throughout the park. The Tomales Point herd would likely expand into the planning area, which would benefit visitor experience by increasing viewing opportunities.

Inadequacy of Mitigation Measures

The proposed mitigation measures for all of the significant environmental impacts from livestock grazing and ranching activities discussed above consist of eight main approaches: 1) new subzoning of ranches to avoid cattle grazing in areas with sensitive resources and to concentrate more intensive activities and impacts in ranch core zones; 2) exclusion fencing to prevent cattle access to areas with sensitive resources; 3) some combination of ranchers and NPS managing rotation, timing, and duration of livestock to achieve grazing levels that are not detrimental or could be beneficial for certain habitat types and species; 4) adherence to RDM standards to prevent overgrazing; 5) a Ranch Operating Agreement specific to each grazing lease/permit that specifies what activities can occur; 6) a grab-bag of best management practices and standards from other agencies listed in Appendix D; 7) mitigations for impacts to ESA listed species contained in the Biological Assessments (Appendices K and L); and 8) some combination of rancher compliance and NPS monitoring and enforcement of lease conditions and promised avoidance and mitigation measures.

The EIS is relying on some combination of these mitigation measures to reduce significant environmental impacts from the livestock grazing and ranching activities that would take place under alternative B.

While the sub-zoning is a promising concept, it relies heavily upon ranchers understanding and NPS enforcing which activities are not permitted in which zones. Resource Protection subzones would, at least on paper, remove grazing from sensitive resources such as riparian areas, surface waters, and federally listed wildlife habitat. The zoning maps make clear that this is going to be a confusing situation at best. For example, the I Ranch zoning map provided in the EIS shows how difficult it will be to actually delineate, let alone protect resources or prohibit activities in Resource Protection sub-zones.

The responsibility for monitoring and maintaining exclusion fencing seems to lie with the ranchers, with some oversight from NPS. PRNS has had continuing problems with unmaintained fences allowing cattle to access supposedly protected areas. Likewise managing

rotation, timing, and duration of livestock grazing will be the responsibility of ranchers, with some oversight from NPS. Presumably these responsibilities will be spelled out in the individual Ranch Operating Agreements, which have not yet been produced and the public has no chance to view or comment on.

PRNS and the NPS have a long history of complete failure to adequately monitor ranching operations or enforce the conditions of PRNS grazing leases. Because of past history and lack of public confidence, we asked NPS in our scoping comments to disclose the ongoing monitoring and enforcement problems with grazing leases, specifically: continuing instances of grazing lease violations by ranchers; if and how the NPS ensures compliance with lease conditions; and whether the NPS has ever taken any enforcement action for grazing lease violations, which it apparently has not. The EIS utterly fails to disclose these issues or evaluate NPS ability to adequately monitor and enforce lease conditions and promised mitigations in the future.

NPS documents we obtained through a Freedom of Information Act (FOIA) request showed a pattern of grazing lease violations by some ranchers and a lack of any enforcement by NPS for lease violations. These violations included: harassing and hazing wildlife with vehicles and dogs; illegal dumping of debris on ranches, including tangled barbed wire strands that risk elk entanglement; trespass cattle regularly occurring for more than a decade; documented overstocking of cattle beyond numbers allowed in a lease; conducting hayage and silage tilling and mowing in unauthorized areas; dead cattle and calves dumped on a ranch in violation of the lease; and failure to pay permit fees on time. Some of these lease violations are posted on The Shame of Point Reyes web site: <http://www.shameofpointreyes.org/documents.html>. Grazing lease violations which our organization and other conservation groups and local residents have more recently reported to NPS were ignored and were not contained in the files turned over by NPS. The FOIA documents we received from the agency made it clear that NPS has no systematic or comprehensive program to monitor grazing leases or ensure compliance with lease conditions.

There should be very little public confidence in the willingness or ability of NPS to monitor and enforce any promised grazing lease conditions, given the history of rancher violations and NPS failure to enforce them. The ROAs contemplated in the GMPA will be much more complex leases, with numerous conditions and mitigation measures. Many of the promised mitigations in the EIS are simply not credible absent a detailed, specific monitoring program conducted by NPS, not ranchers. The GMPA would need to identify dedicated staff and secure funding for regular monitoring, unannounced inspections, and an enforcement policy. It would need to show that these programs would be in place, funded, and effective for the duration of the grazing leases. It would require regular reporting to the public on grazing lease compliance and corrective measures.

Reliance on the RDM standards for mitigation is also flawed, due to unscientific forage

calculations and rancher non-compliance with RDM standards. The NPS and the EIS overestimate available forage at PRNS, based on overly optimistic and not up to date soil productivity data, animal unit calculations based on inaccurate average cattle weight, and an assumption that 100% of the forage above the required minimum RDM is allocated to cattle. The forage calculations also do not account for new livestock which will be introduced under alternative B. The EIS is missing a detailed analysis of forage consumption for any new domestic animals. Furthermore, the U.C. Berkeley rangeland study which NPS commissioned (Bartolome et al. 2015) reveals that 33% of the studied rangelands at PRNS violated the NPS lease minimum RDM standards, the same standards that are included as mitigations in the preferred alternative.

Many of the mitigations for significant impacts are purportedly contained in Appendix D of the EIS. Appendix D seems designed to be confusing and to obscure what mitigations are mandatory and what mitigations are required for which impact. It covers a lot of mitigations and standards for infrastructure, planting, water supply, water management, and discrete projects, for example road upgrades and fencing. There are a couple places in Appendix D where specific measures are called out for specific activities of concern, such as for mowing a requirement for buffers and no mowing zones. The EIS claims NPS staff will monitor to ensure mowing does not exceed agreed-upon areas, but again there is no identification of dedicated staff, funding, or a monitoring program to ensure this will actually happen. Table D-11 is just a slapdash assortment of guidelines and best management practices from other agencies assembled in a confusing and incoherent manner. Appendix D does not further the public understanding of what measures are going to be implemented to protect natural resources. Many of the “mitigations” in Appendix D are simply non-binding Marin County RCD and NRCS best practices and standards with respect to things like soil, water and vegetation conditions. They include USDA farming standards (also non-enforceable guidelines) as mitigation measures for the conservation of soil, water, air, and related plant and animal resources. The EIS is supposed to address mitigations for activities in national parks, not a farm.

Many of the mitigation measures in Appendix D rely upon plans which have not been formulated yet, with unknown conditions, and no ability for the public to view or comment upon them, including Stormwater Pollution Prevention Plans, Weed Monitoring Plans, Nutrient Management Plans, Manure Management Plans, and Conservation Plans from NRCS or NPS for silage or row crops.

The proposed mitigations for ESA listed plants and wildlife are spelled out in Biological Assessments (Appendices K and L). It is clear that the purported beneficial effects from cattle grazing on native plants is highly dependent on the season, intensity and duration of grazing. This would require very highly managed grazing operations, which NPS and the ranchers have never proven capable of conducting at PRNS or GGNRA. Successful rotational, seasonal grazing of the type contemplated in the Biological Assessments would require frequent

monitoring by NPS, rancher acceptance and responsiveness, willingness and motivation for lease holders to comply with difficult and confusing constraints, and enforcement. Some of the mitigations for the listed plants rely on adherence to RDM standards, which has been problematic at PRNS.

Greenhouse Gasses

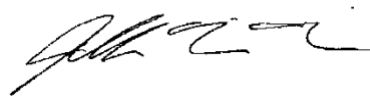
The cattle industry is one of the largest contributors to climate change on the planet, and in California, the dairy sector is the largest source of methane emissions in the state. In addition to the aforementioned effects of Alternative B, the preferred alternative will continue to increase this region's contribution to climate change, and the Coastal Commission must acknowledge that fact in their consistency review, as climate change is inextricably linked to coastal issues.

Conclusion

The Center and TIRN believe that in order to conform with the CCA, the priority for the GMPA/EIS should be to improve native wildlife preservation, ecosystem health and function, and ecological integrity. Management of Tule Elk should occur in a way that promotes the health, function and ecological role of the species on the landscape, and agricultural resources should be managed in ways that reduce the negative impacts to native wildlife and ecological processes.

We urge you to object to the NPS CD because it is not consistent with the CCA for the aforementioned reasons.

Sincerely,



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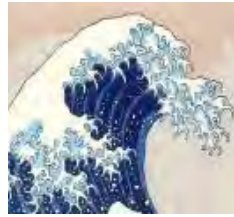
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December 11, 2020

Chair Steve Padilla and Executive Director John Ainsworth
California Coastal Commission
455 Market Street
Suite 300
San Francisco, CA 94105
Submitted via email

Re: Request for Commission to Object to Point Reyes GMP (Federal Consistency Determination)

Dear Chair Padilla and Executive Director Ainsworth,

Our organizations, Save Our Seashore and National Parks Conservation Association, are on record as telling the National Park Service, then Obama administration Secretary of the Interior Ken Salazar, and Seashore ranchers that we could support the continuation of multi-generational ranching in the Seashore only if the Park Service developed a plan that would demonstrate environmental improvements in ranching operations and protection of coastal resources.

The current plan is a step in that direction, but is structurally flawed, putting the cart before the horse by issuing firm authorizations for activities whose mitigations are only contingent, and in some cases non-existent. Without certainty that mitigations will be implemented and on-time, the current plan cannot be ensured of meeting its stated objectives and renders the environmental analyses unreliable.

The plan is complex and proposes leases lasting 20 years (4 times longer than the current leasing program), but when Commission staff asked the Park Service for “warranted and necessary” time until March 2021 to review the plan, the Park Service responded that the Commission had to make a decision before the Trump administration departs on January 20th.

Consequently, the current plan has become subject to end-of-administration political jockeying that diminishes its perceived integrity in the eyes of the public and deprives the Commission of the time to do its legislated task.

Although many of us want to complete this planning process, there is no reason for haste. The Settlement Agreement between the Park Service, Seashore ranchers, Marin County and environmental groups specifically allows the Park Service up until July 2021 to complete the plan, three months after the March 2021 time period the Commission requested.

Nowhere in the Agreement is there direction to rush a plan and complete it before the Trump administration ends on January 20.

Ultimately, a plan that resists fast-tracking due to Trump administration politics, and is instead carefully finalized with the stamp of the Commission and the Biden administration's Park Service, will ensure a more defensible plan, politically and legally.

Thus, the responsible action by the Commission would be to object to the current plan and allow staff to work with the NPS over the coming months to amend the plan to adequately balance actions that will be authorized with mitigations that must concurrently occur.

Next week, we will submit detailed comments on what we believe should be changed.

Again, we can support an outcome that allows for continuation of multi-generational ranching in the Seashore and ensures protection of park and coastal resources. If the plan adds mitigations while ensuring all mitigations will be implemented and on schedule, then we have every expectation to support that outcome.

Sincerely,



Gordon Bennett
President
Save Our Seashore



Neal Desai
Senior Program Director, Pacific Region
National Parks Conservation Association

Cc:
Commission Staff John Weber and Larry Simon

Date: December 11, 2020

To: John Weber, California Coastal Commission

Cc: PointReyesManagementPlan@coastal.ca.gov; Ryan_olah@few.gov; Carey_feierabend@nps.gov

Re: Point Reyes National Seashore General Management Plan Amendment

Dear Mr. Weber,

I worked at Channel Islands National Park (CHIS) from 1993 – 2007 as a wildlife biologist and geographic information systems (GIS) specialist, and then earned a PhD in ecology from UC Santa Barbara in 2008. I worked at CHIS prior to, during, and after the period when cattle were removed from Santa Rosa Island and it is this experience I wish to relate to you in regards to the relevance of this event to current decisions being made about ranching in Point Reyes National Seashore.

The beginning of my participation in the Santa Rosa Island recovery program was in 1995 when several people from our office and other agencies completed a report documenting the water quality impacts resulting from grazing on the island (Rosenlieb et al. 1995). Previously, the State of California Central Coast Water Quality Control Board had issued a Cleanup or Abatement Order to the National Park Service (NPS), specifically identifying free-grazing cattle as a major cause of the erosion and vegetation damage that was impacting water quality. The Rosenlieb et al. report (1995) aimed to provide NPS with management actions that could be taken to improve water quality by returning riparian areas to properly function conditions. To do this, the report concluded, would require the exclusion of cattle from water courses at least seasonally if not permanently.

In response to the Cleanup and Abatement Order and the Rosenlieb report, NPS developed a Resources Management Plan and accompanying EIS (NPS 1996). The preferred action included a combination of pasture closures, pasture rotation, and permanent herd reduction along with other mitigation measures that would lead to improved water quality. As most of you know, NPS was ultimately sued for allowing resource damage from cattle to continue on Santa Rosa and ultimately all non-native ungulates were removed from the island.

For several years during this period I and nearly all my co-workers were involved in the Santa Rosa issue on a weekly if not daily basis. While I was not one of the primary biologists involved and I won't presume to speak for them, I do know that the general feeling within our group was that the science clearly showed that cattle grazing was severely impacting not only water quality but was also significantly damaging many of the vegetation communities on the island. All of the legal and political decisions were out of our control, though, and we often observed the disconnect between the science that we provided and decisions being made at higher levels.

During this period I also participated in studies involving the island fox, a species that would soon become imminently at risk of extinction. The decline and recovery of the island fox is a well-known ecological success story and is described in a book for which I am a co-author (Coonan et al. 2010). This species is found on three of the five islands within the National Park including Santa Rosa. Initially park biologists and other cooperators did not understand the causes of the dramatic fox population declines,

and monitoring and radio collar studies were necessary to collect data on population trends and source mortality.

However, the ranchers on Santa Rosa at that time told NPS that they did not want the fox monitoring program to occur on that island, and thus we were prevented from conducting initial population studies there. It is important to understand that the ranchers of course did not own the island, but that NPS leaders, for reasons unclear to us, acquiesced to their request (which also made no sense as we would in no way be interfering with ranching operations.) The point is that at that time ranching interests held political sway over NPS that was powerful enough to prevent research into a population decline so dramatic that it could easily have led to the extinction of a mammal species found only on the Channel Islands.

Thus, I was extremely frustrated with the priorities of the ranching interests over what I had assumed were those of NPS. However, a few years earlier, I had the opportunity to meet several members of one of the ranching families on a social basis. In circumstances unrelated to my employment at NPS they invited me and my family, including my mother, out to the island to stay at the ranch complex and tour the island with them for a weekend. The family was generous and welcoming to us when we there, and my mother had a great time riding around in their pick-up trucks. Still, it was clear to me that that they had a view of island stewardship that was very different from my own; I observed first-hand that I disagreed with just about everything they did in relation to resource conservation on the island.

My guess, and I have no current communication with any NPS employee at Point Reyes at present, is that the situation at Point Reyes is similar to what I experienced at Channel Islands; many of the staff have developed relationships with some of the ranchers, many of them are conflicted between maintaining personal relationships and fighting for stronger conservation measures, and the science and those who value it do not have the power to counter the political and economic interests that benefit from continued ranching.

There is no doubt that cattle ranching as was practiced on Santa Rosa Island and is now practiced in much of Point Reyes is detrimental to maintaining the natural condition of coastal environments and efforts to slow climate change (Mertes et al. 2000, Rotz et al. 2019), assertions from the ranching community notwithstanding. For example, in a letter from the Point Reyes Seashore Ranchers Association to the park Superintendent in 2014 it was stated, "In essentially every place where NPS decided to end livestock grazing and evict the ranch families, the land stewardship ended." This is untrue. On Santa Rosa Island land management that enhanced land stewardship increased significantly once ranching had ended.

An additional statement in the same document, however, I wholly agree with: "With the loss of livestock grazing, a change in both plant and animal species assemblages occurred." The removal of cattle from Santa Rosa resulted in improved water quality, vegetation recovery, and soil retention (Wagner et al. 2004, Christian et al. 2008, Summers et al. 2018, Woolsey et al. 2018), and allowed studies and recovery management of island foxes to proceed.

The mission of the National Park Service is to "...preserve unimpaired the natural and cultural resources and values of the National Park System for the enjoyment, education, and inspiration of this and future generations." I cannot see from any perspective how the maintenance of cattle ranching in Point Reyes National Seashore supports any of those goals. Moreover, cattle are plentiful in Marin County; I live here

and can see cattle from every window of my home. Thus, the argument that removing the relatively small number of ranches that operate in Point Reyes will have substantial economic impacts seems disingenuous.

In my opinion if the Park Service is committed to managing the natural resources of Point Reyes National Seashore based on science, as they should be, they have no choice but to acknowledge the resource damage that cattle continue to inflict and to move in a management direction that phases out the most damaging ranching practices in coming years.

Thank you for your time.

Sincerely,



Dr. Catherine Schwemm
Tomales, CA 94971

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From: Kat Despain <kat.m.despain@gmail.com>

Sent: Friday, December 11, 2020 6:01 PM

To: Coastal Point Reyes Management Plan <PointReyesManagementPlan@coastal.ca.gov>

Subject: PRNS Comment for CCC

To whom it may concern:

Taking the California Coastal Act to be the main policy component of the State Coastal Management Program, the Seashore Plan amendments clearly are not consistent with several policies found in Chapter 3 of the California Coastal Act, I urge the Commissioners to object to this submittal, for the reasons given below:

1. The Point Reyes National Seashore General Plan amendment is inconsistent with the California Coastal Act because the Act declares that access to the park should be provided for “all the people” (Section 30210). The General Management Plan provides access and opportunity to the ranching families that the public does not receive. For example, the ranches have established endless miles of barbed wire and electrical fencing in and around points of interest and even popular hiking areas. Therefore, the ranches have access to land (28,100 acres), access to exploit natural resources on the land and access to profits acquired from the resources that the public does not.
2. The Point Reyes National Seashore General Plan amendment is inconsistent with the California Coastal Act because the Act declares that access to the park should “protect public safety” (Section 30210). There is profound evidence that animal agriculture/ cattle ranching industries contribute wildly to climate change. This environmental degradation is a threat to public safety, as climate change has led to wildfires, rising temperatures and other disasters in the state of California, harming and killing citizens of the state.
3. The Point Reyes National Seashore General Plan amendment is inconsistent with the California Coastal Act because the Act declares that access to the park should “protect public safety” (Section 30210). The General Management Plan states ranchers are expected “to maintain ranch complex infrastructure, including all water, sewer, and electrical systems, as well as most ranch service roads in a safe condition” (GMPA page 20). However, the ranchers are not public infrastructure services interested in maintaining such services needed for safety; they are private individuals calculating for profits. I do not trust a private party to ensure my safety and the safety of my family and friends. I want an external reviewer/ public agency to maintain facilities and ensure adequate safety for the public.
4. The Point Reyes National Seashore General Plan amendment is inconsistent with the California Coastal Act because the Act declares that it should protect private property owners (Section 30210). However, there are no private property owners at Point Reyes Seashore. There is no private property; it is all public land. As the ranchers are not private property owners (they are leasing public land), there should be no duty by the General Management Plan to protect their interests.
5. The Point Reyes National Seashore General Plan amendment is inconsistent with the California Coastal Act because the Act promises to protect public rights (Section 30210). In the United States, public rights belong to citizens but are vested in and vindicated by political entities. It is a contradiction to allow private individuals to have such power in a

public space, because private individuals do not have the capacity to ensure public rights. I.e. The GMPA protecting the interests of ranchers breaks the promise outlined in this section.

6. The Point Reyes National Seashore General Plan amendment is inconsistent with the California Coastal Act because the Act promises to protect natural resource areas from overuse (Section 30210). By definition, agriculture takes natural resources and transforms them into products. Natural resources are continuously degraded, transformed, or completely replaced by unnatural non native introduced resources from other areas by using unnatural, non-traditional processes that further degrade the natural heritage of the land in question. Allowing agriculture interests to continue and expand directly violates this section, as natural resources are consumed and altered not protected.
7. The Point Reyes National Seashore General Plan amendment is inconsistent with the California Coastal Act because the Act declares that access to the park should “not interfere with the public’s right to access the sea” (Section 30211). The land owned by private individuals on the seashore stands beside the ocean and the beach, obstructing public access. When public visitors visit the park, we are unable to access the ocean from all directions, as we are blocked by ranches/farms. The private operations block us from engaging with the ocean (it doesn’t feel legal to walk through private land, it is unpleasant). Allowing extra development/diversification of ranching land further discourages members of the public from accessing the ocean through the ranching land.
8. The Point Reyes National Seashore General Plan amendment is inconsistent with the California Coastal Act because the Act promises that public roadway to shoreline will be provided (Section 30212). Allowing the ranchers to control the roads through and surrounding their properties not only discourages the public from utilizing the roads but also does not ensure that the roads will be properly and safely maintained in order to allow access.
9. The Point Reyes National Seashore General Plan amendment is inconsistent with the California Coastal Act because the Act promises that public facilities must be distributed throughout an area to prevent overcrowding and overuse of any single area (Section 30212.5). By corralling off land from the public and granting it to private entities, there is less land available for the placement of public facilities, should they be required i.e. public restrooms. While the state of California is actively enforcing social distancing measures as a result of the COVID-19 pandemic, overcrowding and overuse of such facilities is a public health issue, making this section particularly important.
10. The Point Reyes National Seashore General Plan amendment is inconsistent with the California Coastal Act because the Act states that it must provide “lower cost facilities” (Section 30213). As the ranchers are allowed to manage their own facilities, the prices cannot be regulated by a public agency, allowing reasonable, lower cost facilities to exist. The GMPA states that “Fees for any new overnight accommodations established within the planning area through the Preferred Alternative would be subject to review criteria” but if you’re leaving the price-setting to private individuals they have more incentive to maximize profits than publicly-owned facilities do, leading to higher costs (26, Coastal Consistency Determination).
11. The Point Reyes National Seashore General Plan amendment is inconsistent with the California Coastal Act because the Act states that it will protect areas where water-oriented recreation activities can occur (Section 30220). Waste from cattle ranchers flows

into the sea, polluting the area. Pollution of this sort is not safe for humans to swim in, preventing recreational activities and violating the promise of this section.

12. The Point Reyes National Seashore General Plan amendment is inconsistent with the California Coastal Act because the Act states that it will protect oceanfront land suitable for recreational use (Section 30221). Waste from cattle ranchers pollutes oceanfront areas. Pollution on beaches makes them unpleasant to visit, violating the promise of this section.
13. The Point Reyes National Seashore General Plan amendment is inconsistent with the California Coastal Act because the Act states that public opportunities for coastal recreation shall have priority over private residential, general industrial, or general commercial development, but not over agriculture or coastal-dependent industry (Section 30222). The diversification of the ranching industry could be argued as general commercial development rather than agriculture industry development. For example, farm stays/ ranch tours are NOT agriculture-related industries, they are tourism activities. Including these industries for areas of expansion indicates that the ranching individuals are more interested in general commercial development and maximizing profits than they are interested in protecting the seashore and following the CCA.
14. The Point Reyes National Seashore General Plan amendment is inconsistent with the California Coastal Act because the Act states that public opportunities for coastal recreation shall not have priority over the agriculture industry, but the agriculture industry has evolved (Section 30222). As an individual, I reject that the animal agriculture industry is a necessary component of the general agriculture industry, as it is completely possible to live on an entirely plant-based diet; it has been my lifestyle for eight years. As such, cattle ranching and other animal-based agriculture industries are non-essential and should be categorized as general commercial development, not as essential agriculture development. Thus, prioritizing animal agriculture interests in the seashore over recreational facilities--when recreational facilities are inherent to the definition of a national park and animal agriculture is not necessary for any reason at all--violates Section 30222 by relying on an outdated understanding of food production that does not consider animal agriculture's environmental damage, economic inutility and nutritional frivolity.
15. The Point Reyes National Seashore General Plan amendment is inconsistent with the California Coastal Act because the Act states that oceanfront land should be protected and given priority for aquaculture, and the amendment actively prioritizes ranching over aquaculture (Section 30222.5). The cattle ranching industries are actively harming aquaculture industries by polluting the seashore, contributing to the extinction crisis of aquaculture species, and making the area uninhabitable for farmed versions of said species.
16. The Point Reyes National Seashore General Plan amendment is inconsistent with the California Coastal Act because the Act states that upland areas should be reserved for recreational activities and infrastructure (Section 30223). The GMPA concedes that "there are some restrictions within the ranch core area to protect property." These restrictions violate section 30223.
17. The Point Reyes National Seashore General Plan amendment is inconsistent with the California Coastal Act because the Act states that recreational boating should be encouraged (Section 30224). Nothing in the new plan encourages boating; in fact, the

amendment discourages boating. Water areas are not protected by the NPS; ranching activities pollute them.

18. The Point Reyes National Seashore General Plan amendment is inconsistent with the California Coastal Act because the Act states that marine resources shall be maintained, enhanced, and where feasible, restored (Section 30230). While the amendment may claim to update “current management, monitoring and oversight, and improves conditions affecting sensitive coastal resources” the amendment does not consider the long-term environmental impacts of ranching, and it offers no methods of mitigating damages caused by these activities.
19. The Point Reyes National Seashore General Plan amendment is inconsistent with the California Coastal Act because the Act states that special protection shall be given to areas and species of special biological significance (Section 30230). Claims that ranching is the best method of protecting native species and regulating invasive species are false. The amendment gives no evidence for how ranching is supposed to protect native plant species nor prevent invasive species. Rather, as conceded by the amendment, the cattle trample native plants, disrupting the larger marine ecosystem and violating this section.
20. The Point Reyes National Seashore General Plan amendment is inconsistent with the California Coastal Act because the Act states that it is particularly important to minimize “adverse effects of waste water discharges and entrainment, controlling runoff, preventing depletion of groundwater” (Section 30231). However, the amendment suggests little about how to regulate waste water from cattle ranching besides stating that “these activities are conducted outside the rainy season or during dry periods,” to the discretion of the ranchers. There is not enough external oversight to ensure that waste water will be disposed, the runoff will be properly controlled and that the marine resources will not be harmfully polluted to maintain optimum populations of marine organisms.
21. The Point Reyes National Seashore General Plan amendment is inconsistent with the California Coastal Act because the Act states that environmentally sensitive habitat areas shall be protected against any significant disruption of habitat values (Section 30240). Supposedly, “no activities proposed under the Preferred Alternative would occur in sensitive habitats of the state’s coastal zone.” However, the term “environmentally sensitive” is contested. What is “environmentally sensitive” in a world where all environmental factors are connected and alteration of one part affects the whole system? Though the ranching activities are sectioned off in sections of the park, the environmental impacts of said activities have ramifications throughout the rest of the seashore and the larger coastal region.
22. The Point Reyes National Seashore General Plan amendment is inconsistent with the California Coastal Act because the Act states prime agricultural land shall be maintained in agricultural production in order to assure the protection of the areas’ agricultural economy but the areas’ agricultural economy does not need to be protected (Section 30241). For one, 21st century science has better informed us of the negative impacts ranching and heavy agriculture use is having on the natural land and marine environments. Not only that, but the agriculture economy is worth less than the tourism economy of the area. Ranches at the seashore contribute a fraction to the county’s more than \$620 million budget—about \$16 million in 2019. Tourism at Point Reyes Seashore alone brought more than \$100 million to the county. Surveys show that the primary

reason visitors come to the seashore is to see wildlife. The defined agriculture economy is dated; it was once relevant, but now there are more jobs, more money and more economic benefits for tourism in the area than the agricultural economy. Additionally, agriculture is already a dominant component elsewhere in the same county as Point Reyes National Seashore. There is no shortage of agriculture operations located throughout California, but there is a shortage of national seashores; there is only one seashore on the west coast: Point Reyes National Seashore.

23. The Point Reyes National Seashore General Plan amendment is inconsistent with the California Coastal Act because the Act states the long-term productivity of soils and timberlands shall be protected (Section 30243). Ranching has created long term ecological harm to the microbiome and soils of Point Reyes. The most species rich grassland type in North America - the California Coastal Prairie, has essentially been eradicated where agriculture exists in the park. Riparian areas have been completely eroded in some areas where non-native cattle have compounded soils, trampled new growth, destroyed native habitat, and polluted freshwater streams and harmed wetland resources, which leads to further destruction within the ecosystem.
24. The Point Reyes National Seashore General Plan amendment is inconsistent with the California Coastal Act because the Act states that essential public services and basic industries vital to the economic health of the region, state, or nation, public recreation, commercial recreation, and visitor serving land uses shall not be precluded by other development (Section 30254). Agriculture, particularly animal agriculture, is not vital to the economic health of the region (or the state or the nation). However, the park is one of the few national parks accessible to the urban population of the Bay Area and the rest of the West Coast. The continuation and development of ranching impedes on the visitor serving land and public recreation areas, violating this section.
25. The Point Reyes National Seashore General Plan amendment is inconsistent with the California Coastal Act because the Act states coastal-dependent developments shall have priority over other developments on or near the shoreline (Section 30255). Cattle farming and the proposed diversifications are not coastal-dependent developments. A cattle farm, or a chicken farm, can exist in the middle of the country; other coastal dependent industries should be developed on the seashore, as established by this section.

The proposed GMP amendments and the DEIS done on them both clearly show that this federal activity is not consistent with the California Coastal Act. I urge the staff to recommend to the Commissioners that they object to this submittal.

Thank you for your consideration of this request.

Kat Despain
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Commissioners, California Coastal Commission
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Jeannine.Manna@coastal.ca.gov
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Re: National Park Service Request for Consistency Determination for Pt. Reyes National Seashore
EIS/General Management Plan Amendment, Agenda Item CD-0006-20

December 10, 2020

Dear Commissioners and Staff:

We write to you today to express our grave concerns regarding the National Park Service's (NPS) recent Environmental Impact Statement (EIS) and its General Management Plan proposed amendment (GMPA) for the Pt. Reyes National Seashore (PRNS), and the Park's request for a finding of consistency with the California Coastal Management Program (CCMP).

After a three year study period, the Park Service has taken the exact same stance regarding the private, for-profit ranches that occupy about one third of the PRNS as it had prior to the legal challenge that resulted in a required environmental review. Despite the appearance of a lack of scientific or political objectivity, NPS is again recommending increasing the ranch leases from five to 20 year renewable terms, expanded uses to include the raising of pigs, goats, chickens and other livestock, the growing of row crops, and the establishment of overnight guest facilities. NPS also recommends a succession process that no longer keeps these putative "historical" ranches in the original ranching families' hands, or even their workers', but allows for eventual operation by heretofore completely unaffiliated persons, thus establishing a permanent presence of ranches that were meant to be phased out after a 25 year period (or a life tenancy of existing ranch occupants, whichever was longer). The removal of these environmentally detrimental, for-profit, publically-subsidized concentrated animal feeding operations is long overdue.

Under the Coastal Zone Management Act, sections 304(1) and 307(c)(1), and 15 CFR § 930.30, exclude from the coastal zone all lands whose uses are subject solely to the discretion of the federal government. Notwithstanding this exclusion, if activities on excluded lands affect land or water uses or natural resources of the coastal zone, they must be reviewed for consistency with the CCMP. Furthermore, the CCMP states in Section 30007.5 that the Legislature recognizes that conflicts may occur between one or more policies of the division (for instance, natural resource protection and preservation of coastal public access). The Legislature directed that in carrying out the provisions of the

CCA, “such conflicts be resolved in a manner which on balance is the *most protective of significant coastal resources*” (emphasis added), and that the preferred alternative must be “consistent to the maximum extent practicable” with the CCMP’s provisions. The location and geological nature of the Pt. Reyes peninsula, as well as it being the only National Seashore on the West Coast, makes it a “significant coastal resource.” NPS’s Option B is the second most environmentally damaging of the six alternatives studied and is clearly inconsistent with the CCMP.

We find that Option B is not consistent with the CCMP for the following reasons:

Currently, the dairy and cattle ranches that occupy about one third of the PRNS are given conditional waivers from the San Francisco Regional Water Quality Control Board (RWCB) to pollute the land and waters of Pt. Reyes with over 10,000,000 gallons of cow manure each year, which when spread over open land, drain into the creeks, bays and Pacific Ocean during storm events, as well as percolate into the water table. The impacts of this runoff have made the waters of Pt. Reyes among the most polluted in all of California, with impairment from excess nutrients, pathogens, and sediment, including *E. coli* and fecal coliform pathogens. The main sources of water quality degradation in the planning area are bacteria and nutrient loading from nonpoint sources associated with ranches, dairies, septic systems, and stormwater runoff (Wallitner 2013; Pawley and Lay 2013; Carson 2013). The Board’s Waivers of Waste Discharge Requirements only address the Tomales Bay Watershed, not the Drakes Bay and Pacific Ocean waters, where most of the ranches’ runoff drains to. The EIS has not sufficiently monitored these impacts to be able to determine that they are not a threat to endangered and threatened species.

Although the RWCB issues the waivers, it does not enforce them. That is left up to NPS, in the form of individual Waste Management Plans (WMP) for each ranch. The WMPs are designed to be self-created by the ranchers, self-monitored and self-enforced. Yet despite repeated requests by members of the public, no one has been able to get ahold of any of the plans, and to date, NPS has not enforced the production of any, and since none have been provided, it is apparent that there is no real mitigation of this source of pollution. The GMPA does not account for this and does not mitigate the proposed increased uses.

The EIS states “*The NPS has also conducted analysis of long-term water quality data in the coastal drainages ... (see appendix L of the GMPA/EIS). In these areas, the data indicate decreasing trends in fecal indicator bacteria concentrations over time, coinciding with adjustments in ranch operations (e.g. transition to organic dairy operations, reduced herd size, etc.) and implementation of Management Activities to protect water resources.*” The EIS does not provide current quantified data to support their conclusion that fecal indicator bacteria are indeed decreasing today. The lack of sufficient monitoring locations and any recent data coupled with the lack of enforcement of non-existent WMPs means increased ranch uses will increase pollution levels, in violation of the CCMP.

Other ways the proposed uses violate the CCMP by affecting coastal resources both within and outside of the PRNS:

* The operation of the ranches is destructive to the native fauna, and the proposed increased operations, allowed to continue over an extended period of time, will increase the damage. Native birds have been supplanted by large numbers of corvids (ravens and crows), which have increased in number due to animal feed sources. Ravens prey on the nesting Snowy Plover, a federally listed species. Ground nesting species are routinely destroyed by silage mowing, as well as fawns and small mammals.

Shorebird populations have declined in Tomales Bay by over 60% in the past 30 years of monitoring, according to a recent Audubon Canyon Ranch white paper, caused in part by non-point source water pollution such as manure runoff. Ground-nesting species, such as the California horned lark, savannah sparrow, grasshopper sparrow, song sparrow, western meadowlark, California quail, and northern harrier, are susceptible to impacts from cattle grazing and vegetation management such as plowing and harvesting.

* Agricultural activities that affect songbird populations will also affect the foraging of American peregrine falcons, which nest at Point Reyes, and merlins. Several other special-status raptors rely on grassland habitats, including the burrowing owl, white-tailed kite, and ferruginous hawk, and would be negatively affected by increased livestock grazing and vegetation management.

* The operations of the ranches are destructive to the native flora. Native deep rooted grasses have been displaced by shallow rooted annual grasses grown for silage, which is accompanied by the introduction and spreading of numerous invasive plant species. The widespread destruction of native grasses, wildflowers and shrubs negatively impact plant diversity as well as rainfall absorption, replenishment of the water table, and the healthy biodiversity of the soil. The proposed increased uses will consume greater quantities of the limited water sources on the peninsula for non-recreation purposes, when local communities are at this time beginning to restrict usage to conserve supplies. With the predicted and occurring increase in major draughts throughout California, this is a misguided choice of options. Option F, however, would improve the situation by removing the ranches and reducing water consumption.

* Migratory birds and waterfowl are negatively impacted by occupation of the west shore of the Park, part of the historic Pacific Americas Flyway, disrupting navigation, feeding, resting and natural movement by the denuding of the ground over vast areas. Migratory birds have imprinted on PRNS for eons as a geographically critical stopping point on their annual journeys from the Arctic to South America and back. The cattle and dairy operations have destroyed the natural biome over thousands of acres along the coast, eliminating food and shelter resources for exhausted birds that must replenish their stored energy to complete their trek. This is contrary to the NPS' mandate to protect the park's resources and negatively impacts migratory birds' survival, which is already severely impacted by human activity. (North America has lost over 3 billion birds in the past half century, or about a quarter of all birds.) PRNS should not add to the burden; in fact it should be a model of healing and restoration for others to emulate. This can be achieved by NPS choosing Option F, removal of the ranches.

* Miles of fences impede the natural movement of wildlife throughout the Park. The NPS assumes approximately 20% of the 340 miles of existing fencing would be replaced, 24 miles of fence would be installed for the Resource Protection subzone, and an additional 35 miles of new fence would be constructed to improve livestock management over the 20-year lease/permit term. The NPS has not used wildlife-friendly fencing in the past and is not committing to using it now. This will negatively impact the native wildlife's existing travel corridors and the Tule elk's ability to find forage and water sources. There are many documented instances of old ranch fencing being abandoned throughout the park, causing animal injury and even death of Tule elk that get caught in it.

* Opt. B would expand private uses in a national park, including retail farm stands and farm stores, row crops (up to 2.5 acres per farm), additional livestock including pigs, goats and chickens, and ranch-related services such as mobile slaughter houses. Additional farm animals will attract predators and

create a conflict between ranchers and native animals, including trapping and killing native predators to protect the livestock. These uses would diminish the public's access to a larger area of the park than now exists. Furthermore, we know of at least three personal accounts of members of the public being driven off public lands by hostile ranchers, despite the public's right to access. This is an increase in social inequity for Bay Area residents and park users in general. It is a violation of the NPS's mandate to protect the natural resources and provide access to the public.

* Opt. B would allow overnight accommodations on the ranches. This commercially exploits park access, restricting access and enjoyment to some parts of the park to those who can afford to pay for it. This is also an increase in social inequity.

* The ranches are the greatest source of carbon pollution in the park, notably adding to the causes of global climate disruption. Increased area for cattle operations will increase release of greenhouse gases and continue it over an extended period of time, when we can least afford it. No ranches are sequestering carbon in any form today, and there is no viable plan to do so. The suggested use of methane digesters built over manure ponds is prohibitively expensive and won't be paid for either by the ranchers, who could not financially justify it, or the NPS, which has been underfunded throughout the past decades. (The NPS can barely keep up with the fence maintenance it is responsible for now.)

* The ranches are not in any way "historical." They are large, industrial confined animal feeding operations (CAFO), with vast loafing barns, manure collection ponds, modern milking processes, the spreading of millions of gallons of manure by truck and much greater numbers of cattle than were historically ranches. The impacts are incomparably larger than any historic uses. Therefore any rationalization by NPS for preserving "cultural" or "historical" values are mere fig leaves for ongoing commercial enterprises.

* Section 30251, Scenic and visual qualities, states "*The scenic and visual qualities of coastal areas shall be considered and protected as a resource of public importance.*" Any cursory look at the ranches and the degraded conditions of the land caused by excess number of cattle will reveal a desolate moonscape of bare ground, a few paltry weeds, rutted cow paths and an environment that is the antithesis of Section 30251's goals. This is not what the public wants to see in its national parks.

It is important to note that under the Trump Administration, the policy across all federal agencies has been one of private, often corporate, exploitation of public resources for private gain at the expense of the public's interests. We see that here in the NPS' insistence on supporting Option B, the second-most destructive and just about the least popular option of the EIS, regardless of having documented its destructive impacts. This is contrary to the law, policy and the environmental record, and by insisting on holding the consistency hearing before the inauguration of the new Biden Administration, it is clear that the NPS has taken a contorted position to try to justify the continuation of ranching in the Seashore against the public's interests and its clear wishes. This is in violation of the California Coastal Act and CCMP, which reads in sec. 30001 (c), "That to promote the public safety, health, and welfare, and to protect public and private property, wildlife, marine fisheries, and other ocean resources, and the natural environment, it is necessary to protect the ecological balance of the coastal zone and prevent its deterioration and destruction." Private exploitation of a national park by widely destructive ranching practices clearly violates this provision.

The NPS is attempting, through non-quantification of critical environmental impacts and the listing of meaningless mitigations that are not even feasible, let alone promised, to avoid full scrutiny and accountability. Untrue claims of sustainability, a lack of enforcement of viable mitigation programs like ranch waste management plans, a lack of protection of Seashore waterways, native plant, bird and animal life, coupled with the ignoring of existing ranch abuses, show that this plan cannot meet the requirements of the CCMA.

In conclusion, since the mission of the Commission is to protect the natural resources of the coastal zone, and for the above stated reasons (and many others that have not been listed here), it would be most appropriate to totally reject the NPS's consistency finding. We look forward to the Commission ruling to protect our precious coast.

Thank you for your attention to this matter.

Sincerely,

Dr. Marty Griffin

Matt Maguire

Dr. Martin Griffin is the author of *Saving the Marin-Sonoma Coast*, a history of the battle to protect West Marin and Sonoma Counties from overdevelopment, and he has been instrumental in guiding the Marin County Board of Supervisors in rezoning West County lands to a minimum of 60 acres, thus further protecting them from commercial speculation and over development.

Matt Maguire is a former two-term Petaluma City Councilman and a long-time advocate for public access to open space. He is President of the Board for Friends of Lafferty Park.

From: Jack Kenney <kenneyj88@yahoo.com>
Sent: Thursday, December 10, 2020 7:01:21 PM
To: Carl, Dan@Coastal <Dan.Carl@coastal.ca.gov>
Subject: point reyes national seashore land management

Project Name and Application Number:

Nature of Communication (In Person, Telephone, Other): other

Date and Time Requested: 12/10/2020

Full Name: jack kenney

Email: kenneyj88@yahoo.com

On Behalf Of: Jack Kenney

Comments:

I am writing to the CCC to state that the cattle ranches should be removed from point reyes seashore and the leases should not be renewed because

- 1) it causes there to be dangerous levels of fecal coliform in abbots lagoon, point reyes great beach and kehoe beach
- 2) the gross barron dirt/manuer land is ugly to people who visit the seashore including myself
- 3) the cattle ranches were paid for their land and supposed to have left the park by 1987

Public comments submitted to the Coastal Commission are public records that may be disclosed to members of the public or posted on the Coastal Commission's website. Do not include information, including personal contact information, in comments submitted to the Coastal Commission that you do not wish to be made public. Any written materials, including email, that are sent to commissioners regarding matters pending before the Commission must also be sent to Commission staff at the same time

Management Plan

Joseph McDonald <BIGMAN216@msn.com>

Thu 12/10/2020 11:52 AM

To:

- Coastal Point Reyes Management Plan <PointReyesManagementPlan@coastal.ca.gov>

Dear Madam/Sir :

I am writing to express my opinion that the Management Plan would not be consistent with the Coastal Zone Management Program; because of the impact on wildlife due to habit impacts and loss, and water quality and quantity impacts from cattle and other farm animals.

Thank you,
Tom McDonald
San Rafael Ca