

**CALIFORNIA COASTAL COMMISSION**

455 MARKET STREET, SUITE 300  
SAN FRANCISCO, CA 94105-2219  
FAX (415) 904-5200  
TDD (415) 904-5400



**Th6b**

**CD 0006-20 (National Park Service)  
December 18, 2021**

**EX PARTE**

Received 11/20/2020

### Ex Parte Communication Disclosure

**Filed by:** Commissioner Katie Rice

**Re:** USNPS General Management Plan Amendment EIR

**Day/time:** November 13, 2020 2 p.m.

**Type of communication/Location:** Zoom meeting

**Initiator of communication:** Jenny Calloway, Staff to Congressman Huffman

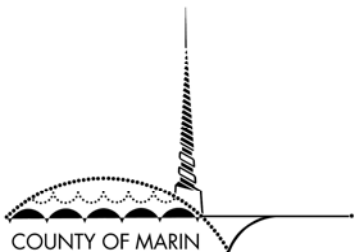
**Identity of all persons present during communication:** Katie Rice, Congressman Jared Huffman, Jenny Calloway

#### Comprehensive Description of communication content:

Congressman Huffman touching base with me in my capacity as Marin County Supervisor and as Coastal Commissioner with regards to if/how each respective agency will be processing the USNPS General Management Plan Final EIS. I explained that the Board of Supervisors has submitted multiple comment letters on the draft EIS, with the last in fall of 2019 specific to the Draft EIS (see attached.) I explained that there is no intention at this time on part of Board of Supervisors to provide further comment on the Final EIS. With regards to the Coastal Commission review for Federal Consistency, I communicated that it was my understanding that it would be coming before the Commission in January during a special all day hearing. We discussed at a high level the primary issues being raised by the public around the plan. I shared that the commission has been receiving public comment at recent commission hearings regarding Elk range and management, water quality, ranching impacts, and ranching in the seashore in context of Marin agricultural industry/economy generally. The congressman also inquired about commission meeting process/protocol.

**Date:** Nov 20, 2020

**Signature:** 



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September 17, 2019

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Marin County Civic Center  
3501 Civic Center Drive  
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GMP Amendment  
c/o Superintendent Cecily Muldoon  
Point Reyes National Seashore  
1 Bear Valley Road  
Point Reyes Station, CA 94956

**Subject: Review Comments on the Point Reyes National Seashore General Management Plan Amendment and Draft Environmental Impact Statement**

Superintendent Muldoon,

**Introduction**

The release of the Draft Environmental Impact Statement (Draft EIS) for the Point Reyes National Seashore (PRNS) and North District of the Golden Gate National Recreation Area (GGNRA) General Management Plan Amendment (GMP Amendment) is a significant milestone for the evolving and successful partnership to secure an open and connected landscape throughout west Marin. Sharing again our sentiments from our scoping comments letter (attached), submitted in November 2018:

“The Marin County Board of Supervisors considers it a privilege to continue the legacy of our predecessor, Peter Behr. Through his leadership and collaboration with many instrumental partners, PRNS and GGNRA came into existence. Paralleling the steps and actions taken to make this possible are Marin County’s precedent setting land use policy actions to preserve Marin’s complementing private agricultural lands and strategically support their viability through diversification in agricultural production in our Countywide Plan. We have put these policies in place for the same purpose and goal that there is ranching on PRNS and GGNRA – that is, to support and embrace sustainable, viable, and environmentally friendly farming that protects West Marin’s land and water endowment and the history of its agricultural community.”

The County of Marin is also in complete agreement with the Joint Explanatory Statement regarding House Joint Resolution 31 (the Consolidated Appropriations Act, 2019) that stated “multi-generational ranching and dairying is important both ecologically and economically” and is “consistent with Congress’s intent for the management of Point Reyes National Seashore.”

In keeping with these actions and policies, and with the following specific comments on the Draft EIS considered, the County of Marin is in support of the preferred alternative identified in the Draft EIS – Alternative B. This alternative, by providing long-term leases to all currently active farm families on the maximum

extent of ranch land, embraces the connection of cultural and ecological resources that exists on Marin's working agricultural landscape. Specifically, Marin County recognizes the purposeful approach and significant detail to natural resource preservation and protection proposed in Appendix D and the draft PRNS and North District GGNRA Agricultural Lease/Permit and Ranch Operating Agreement template.

With that support stated, the County of Marin offers the following specific comments for completing the GMP Amendment and EIS.

### **Specific Comments to Draft EIS Adequacy in Analysis and Mitigation**

While supporting Alternative B, we do have comments for additional analyses and inclusion in the Final GMP Amendment and EIS. We are requesting again the consideration of our scoping comments as submitted in their entirety on November 26, 2018 by attaching that letter to this submission. Addressing these points in the Final GMP Amendment and EIS will insure adequacy in mitigation measures, achievement of the GMP Amendment goals, and implementation of the PRNS/GGNRA enabling legislation intent. Regarding a select number of these we provide the following specific comments and rationale:

1. Strategies for the Preservation of Area Resources and inclusion of management and/or preservation strategy for ranch viability (Table 2, pages 27-30): The working landscape and agricultural viability is missing as a cultural resource in this table and throughout the Draft EIS. Marin County has long recognized the contribution of Marin's operating farms and ranches and the importance of a critical mass of these for the viability of Marin's food system.<sup>1</sup> Stemming from this local policy recognition, the Marin Economic Forum has recognized agriculture as a targeted industry<sup>2</sup> and is including agriculture in its ongoing business retention and expansion campaign<sup>3</sup>. The EIS must include an agricultural viability strategy in its analysis to achieve its cultural preservation goals and strategies.
2. Planning beyond the 20-year lease terms: In our scoping comments dated November 26, 2018 we recommended that the GMP Amendment should include a "...plan for continuation after the proposed 20-year leases through lease extensions or renewals." The GMP Amendment will be inadequate to achieve its stated strategies and the intent of the enabling legislation without this plan because it will create uncertainty for the preservation of PRNS/GGNRA's recognized working landscape as a cultural resource. By including an option for extending or continuing the leases beyond the 20-year terms, with a longer time period than the proposed 6-months prior to lease termination, NPS will avoid the need to again initiate and implement a lengthy and conflict-ridden planning process.
3. Viability of diversification – Marin County holds that "diversification has strengthened Marin's local family farms, local economy, and local food system (Scoping comments dated November 28, 2018)." Unfortunately, the Draft EIS presented options for diversification with constraints that render them inviable. For example, 2.5 unirrigated acres for row cropping is too small and misses opportunities for crop production using irrigation that will allow for year-round

<sup>1</sup> Marin Countywide Plan and Agriculture and Food Chapter -

[https://www.marincounty.org/-/media/files/departments/cd/he/cwp\\_cd2.pdf](https://www.marincounty.org/-/media/files/departments/cd/he/cwp_cd2.pdf)

<sup>2</sup> Marin Economic Targeted Industry Studies, Marin Economic Forum, 2004.

<sup>3</sup> Marin County Business Retention and Expansion Project, Marin Economic Forum

diversification. Similarly, the limiting of multi-species grazing to only the pasture subzones misses important and integrated natural resource management and agricultural diversification objectives in the range and resource protection subzones. Revising the EIS diversification options with analysis of their viability will advance achievement of the GMP Amendment goals and strategies.

4. Ranch Operating Agreement and real-time decision making: In our scoping comments of November 26, 2018 (attached) we emphasized the importance of real-time decision making for agricultural and natural resource management objectives. We are concerned that the only opportunity to make management decision changes is during the 30-day review period proposed as part of the annual Ranch Operating Agreement renewal process. The GMP Amendment and Final EIS must include a process for NPS staff and leasing agricultural operators to make needed and timely adjustments on at least a weekly and monthly basis to agricultural operations and mitigation measure implementation. This will provide the necessary adaptive management that is accepted and part of existing ranch and farm lease operations outside the Planning Area.
5. Greenhouse Gas Emission Reductions and Carbon Offset potential: Through our updated Climate Action Plan<sup>4</sup> (CAP), we have set a path for partnering with west Marin agricultural operators in the reduction of greenhouse gas emissions and the realization of offsets through carbon sequestration. This effort, and that of Drawdown Marin to do comprehensive action planning for the built and unbuilt environment that realizes significant and real change to Marin's carbon footprint, were recommended to the NPS in our scoping comments. The adequacy of the GMP Amendment and EIS will be improved by reconciling its GHG emissions inventory with that in Marin CAP and integrating with the opportunities for carbon offsets laid out in the Marin CAP and Drawdown Marin planning efforts, including carbon farm plans.
6. Ranch Zone and Subzoning Framework: Marin County is in general support of the proposed Ranch Zone and Subzoning Framework proposed in the Draft EIS. However, in keeping with our scoping comments, the County of Marin also holds that the final GMP Amendment and EIS will be inadequate until clarity for how the subzones will be determined, in concert with the leasing rancher, and the flexibility necessary for addressing resource management objectives across subzones are included. Where subzones are delineated and how to manage within each subzone will benefit from the long-term intimate knowledge of the landscape that each rancher has. Similarly, some agricultural and natural resource objectives will cross subzone boundaries and, unless considered in the final GMP Amendment and EIS, NPS staff and leasing ranchers will not be able to address them effectively.
7. Elk management plan and impacts to agriculture: The County of Marin supports the science-based wildlife management approach proposed within the Draft EIS. The Draft EIS is, however, missing analyses and mitigation of impacts from competition between grazing livestock and elk. This includes compensation for losses of silage, improved pasture, supplemental feed and costs for fence and infrastructure repair resulting from elk consumption and damage. Additionally, the Draft EIS will present a more comprehensive management plan by including the analyses and option of elk relocation and

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<sup>4</sup> Marin Climate Action Plan Update 2015 - [https://www.marincounty.org/~media/files/departments/cd/planning/sustainability/climate-and-adaptation/execsummarymarincapupdate\\_final\\_20150731.pdf](https://www.marincounty.org/~media/files/departments/cd/planning/sustainability/climate-and-adaptation/execsummarymarincapupdate_final_20150731.pdf)

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separation through fencing. Lastly, providing clearer definitions of what constitutes a new herd and the process and methods for preventing their development is required in the Draft EIS. The EIS will not be adequate until it includes these approaches and mitigates these impacts.

8. **Quality and Quantity of Housing:** Providing enough quality housing is of critical importance for the County of Marin and its communities, including west Marin. Housing on-farm is central to this community need and the integrity of the community fabric in supporting farm employees and families, including reduced labor force road miles and increased school enrollment. The GMP Amendment and DEIS will become a strong partner for secure housing by integrating with the Marin Housing Task Force and federal housing programs. This should include clarity in the Ranch Lease Template and Ranch Core subzone of the process for adding new housing and improving existing homes.

### **Closure**

Main County commends NPS for releasing a well presented Draft EIS. Including the research and public participation from the start of the original Ranch Comprehensive Management Plan, this Draft EIS review period marks nearly five long years of effort to create a management plan and process to continue the mutual benefits of working ranches and dairies on the PRNS and GGNRA. The County of Marin is ready to work with NPS to resolve the remaining details, analyses and mitigation needed to arrive at a Final GMP Amendment and EIS that can accomplish the cultural and ecological mission and goals held on these NPS lands.

Respectfully,



Kathrin Sears, President  
Marin County Board of Supervisors

Cc: Senator Dianne Feinstein  
Senator Kamala Harris  
Congressman Jared Huffman

Attachment: Scoping Comment Letter dated November 26, 2018