

**CALIFORNIA COASTAL COMMISSION**

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**Th3a**

**CD-0006-20 (National Park Service)**  
**April 22, 2021**

**CORRESPONDENCE**  
(received as of March 26, 2021)

Individual Members of the Public  
Part I

This item is a form letter sent to the [PointReyesManagementPlan@coastal.ca.gov](mailto:PointReyesManagementPlan@coastal.ca.gov) inbox from **12,360** separate contacts:

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## **Reject the Conditional Compliance to Point Reyes GLMPA**

Dear Executive Director John Ainsworth,

As someone who is concerned about wild animals and wildlands, and one of over 250,000 In Defense of Animals supporters, I urge you to vote against the staff-recommended conditional compliance to the Point Reyes General Land Management Plan Amendment (GLMPA), and object to the National Park Service's consistency determination, which is not consistent with the California Coastal Management Plan.

The CCC received over 20,000 comments opposing the park's plan to continue ranching leases within the national park. We applaud the Commission for postponing the public hearing, which will allow enough time to adequately review and analyze comments with scientific and technical data.

The staff report focused on water quality, yet the last tests were documented in 2013. In Defense of Animals recently performed professional scientific water quality tests from key collection points at Point Reyes National Seashore. Now the Commission has ample opportunity to review these new findings.

The report also did not address other spillover effects from the Point Reyes GLMPA, including air quality and climate impacts from grazing cows, water quantity, and the loss of coastal public access.

Please vote against the conditional compliance to protect our waterways and the Pacific Ocean from harmful spillover impacts. Thank you for your consideration of this important and timely matter.

This item is a form letter sent to the [PointReyesManagementPlan@coastal.ca.gov](mailto:PointReyesManagementPlan@coastal.ca.gov) inbox from **10,869** separate contacts:

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## **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](mailto:PointReyesManagementPlan@coastal.ca.gov) inbox from **9,514** separate contacts:

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## 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.

This item is a form letter sent to the [PointReyesManagementPlan@coastal.ca.gov](mailto:PointReyesManagementPlan@coastal.ca.gov) inbox from **7,956** separate contacts:

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## **Manage Point Reyes for Wildlife — Choose Alternative F**

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](mailto:PointReyesManagementPlan@coastal.ca.gov) inbox from **3,734** separate contacts:

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## NPS GMPA Consistency Determination

Commissioners,

I am writing to ask you to please find the NPS Consistency Determination for the General Management Plan Amendment/Final Environmental Impact Statement (GMPA/EIS) for Point Reyes National Seashore and the north district of Golden Gate National Recreation Area not consistent with the California Coastal Management Program.

This plan is not consistent to the maximum extent practicable with the California Coastal Management Plan for many reasons. It would allow significantly new development, uses and activities on national parkland which would irreversibly and negatively impact the nearby coastal zone resources and public enjoyment of the coastal zone. For example, the expanded and new agricultural uses and intensity would heighten the already troubling impacts to water quality in nearby streams, further threatening endangered salmonids in the area.

This plan would also treat native tule elk as problem animals to be killed or hazed, while authorizing additional and expanded agriculture uses which are certain to cause further conflicts between ranching operations and native wildlife. Native tule elk were brought back from the brink of extinction and Point Reyes National Seashore is the only national park where tule elk are found. The public, including myself, would be devastated at the thought of intentionally killing these majestic creatures. This in no way conforms with your mandate of protecting our recreational opportunities and public enjoyment of the coastal zone.

For all these reasons, I urge you to find the GMPA/EIS not consistent with the California Coastal Management Program. Thank you for your consideration.

This item is a form letter sent to the [PointReyesManagementPlan@coastal.ca.gov](mailto:PointReyesManagementPlan@coastal.ca.gov) inbox from **48** separate contacts:

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## **Please Vote Against Conditional Compliance**

Hi California Coastal Commission,

I am writing to ask you to vote AGAINST the staff-recommended conditional compliance to the Point Reyes General Land Management Plan Amendment (GLMPA), and instead object to the National Park Service consistency determination, as it is not consistent with the California Coastal Management Plan.

The vote on the conditional compliance is scheduled for January 14th. That is just a few weeks after the staff report came out. The CCC received over 20,000 comments opposing the park's plan to continue commercial cattle operations within the National Park. Many of those comments contain scientific and technical data that will take longer to analyze than just a few weeks. And, we know more information is still being collected and submitted.

The CCC staff had requested until March 2021 to analyze information before issuing the report, but was denied by the National Park Service. They asked that the vote happen in January—denying adequate time for a proper assessment of their plan. It is not a coincidence that the vote will happen just a week before the current administration leaves office. Public lands are under attack, and Point Reyes seems to be one of them.

In addition, the staff report lacked sufficient data on other spillover effects from the Point Reyes GLMPA. For example, nothing about water quantity was addressed in the entire Point Reyes National Seashore portion of the planning area. Nothing about climate impacts from cattle was addressed. What about migratory birds? What about eelgrass and orcas? What about endangered salmon?

This is an important decision that will impact the California Coast for the next several decades, it is imperative to have all the relevant information, and enough time to analyze that information! That's why it is important to vote against this compliance— there is simply not enough information, and not enough time to analyze it.

In California, we set the example of environmental integrity— so let's not rush our decision making process without proper analysis of all the information. Please vote against the conditional compliance on January 14.

Thank you for taking the time to read this.

This item is a form letter sent to the PointReyesManagementPlan@coastal.ca.gov inbox from **34** separate contacts:

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## **Objection to Coastal Commission Consistency Determination No.: CD-0006-20**

Dear Coastal Commissioners:

I am writing to object to the federal consistency determination for the National Park Service's (NPS) Point Reyes National Seashore General Management Plan Amendment (GMPA).

This process is being rushed. Based on the amount of public interest and the proximity of the Point Reyes National Seashore to the urban areas of the Bay Area, it is important adequate time is allowed to review and comment on the GMPA. The decisions being made will guide management for two decades. It is essential that the GMPA is guided by science, policy and the public interest.

1. The GMPA will guide park management for the next two decades. It is essential that the Coastal Commission has enough information and time to review the documents in regular order. The Commission's review timeline was rushed during the holiday season and in the middle of a global pandemic and spike in cases that resulted in new Stay-At-Home orders being issued in California.
2. In addition, the Commission staff has not had adequate time to review the complexities of the GMPA and negotiate with NPS to reach agreements to improve and modify the plan to protect coastal resources. This is out of character with past federal consistency determinations that afford both agencies the time to comprehensively review plans.
3. The initial review focuses on violations of Sections 30230 and 30231 of the Coastal Act to protect areas of special protection and biological significance. However, there are other spillover impacts that were not addressed in their initial review. For example: a) Harm to nesting migratory birds when fields are mowed and silage is harvested during nesting season. b) Emergency authorization to pump surface water from fresh water creeks for commercial dairy use during drought conditions without additional assessment and review.
4. The GMPA lacks information on when or how plans to reduce negative impacts (or harm to the environment) would be put into place. This is especially concerning for new types of ranching activities (diversification).
5. The GMPA lacks triggers and funding to implement best management practices and mitigations for current operations. Plans are just plans without the ability to implement them.
6. New conditions must include a timeline for public review. The present Coastal Commission process is out of character with past consistency decisions where additional input and scientific and expert opinions are incorporated to ensure conditions are comprehensive and reasonable. Additional time is necessary for the public to review the new conditions in order to build public confidence and transparency before they are finalized.

I respectfully request that the Commission ask NPS for additional time to review all of the documents and that any new conditions are available for public review and comment.



This item is a form letter sent to the PointReyesManagementPlan@coastal.ca.gov inbox from **21** separate contacts:

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## Point Reyes Elk National Park

California Coastal Commissioners

I object to the US National Park Service plan to kill any of the Tule Elk herd in the Point Reyes Seashore National Park and the presence of any commercial operations such Cattle and dairy ranches.

These are my reasons:

1. 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 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. 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: Linda Swartz <lsharmony04@gmail.com>

Sent: Thursday, March 25, 2021 3:30 PM

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

Cc: Craig\_Kenkel@nps.org; Diane Gentile <Diane@savepointreyesnationaleseashore.com>

Subject: Request Delay in Final GMP for PRNS

To The Staff at the California Coastal Commission,

I am a concerned citizen determined to keep Point Reyes National Seashore from permanent ecological damage that will be the certain result of the management plan which is in the process of being set by the National Park Service and the seashore managers. This "Plan B" would enshrine ranching in the park and make it even more difficult than it has already been to mitigate the continued damage to its soils, waters, wildlife and wilderness values, as well as keeping the public off of 30% of the lands which are rightfully ours.

As a member of Save Point Reyes National Seashore and as an advocate of public lands, I ask that there be a deferral of the finalized plan until there have been public hearings which are not dominated by the political interests so far represented in previous meetings. We have been petitioning and writing the NPS and the Superintendent since the inception of this plan spurred by the EIS that came about as a result of the lawsuit by environmental groups including Western Watersheds and Centers For Biological Diversity. Here are some of the pertinent facts surrounding our complaints that have yet to be fully addressed:

1. Over 90% of the public comments elicited by the EIS were favorable to saving the tule elk and keeping the wilderness features of the park, and were unfavorable to ranching. We told later that these comments would never be part of the actual decision making process.
2. We have presented myriads of scientific evidence proving the massive degradation of soils in the park from erosion and extensive manure pollution.
3. We have presented evidence of the loss of the original California coastal prairie habitat here in Point Reyes directly due to ranching activities, from the spread of invasive plant species and the trampling of native soils. Through intensive study and photographic evidence, we have documented the damages to the microbiota that holds these soils together and is necessary to support the biodiversity of plantlife and wildlife.
4. We have documented the decline of rare birds and a general decline in all birdlife and wildlife that once thrived here. We have shown that the management plan will cause even greater destruction because the addition of even more cows and even other commodity animals means competition from native foxes, bobcats, coyotes badgers, rabbits, and other animals. We have documented the damage to nesting sites and dens and other wildlife protections from the mowing of hay for silage, as well as fence entanglements causing maiming and death to wildlife.
5. The EIS itself and a number of other documents have shown unequivocally that the waters of Point Reyes are polluted. Yet the park service claims without hard evidence that the ranchers have "mitigated" this and should be allowed to continue to receive waivers even though water quality is not shown to have improved.

6. Plan B calls for regular "culling" of the tule elk herd after they were brought here to reestablish the herd and help it recover from its endangered status. We are aware of more than 900 plant species, 490 birds and 80 animals at the seashore, of which 50 are federally listed as threatened, rare or endangered. There are 10 cows to every elk living here.

7. The public is prohibited from using park lands allocated to ranches. Instead of the beautiful scenery guaranteed by park laws mandating "scenic values," we see ranching infrastructure and more fences being built even before this plan has been approved!

8. This is traditional Coast Miwok land, yet the tribes have not been consulted on this plan.

What we are asking is that the administrations in charge of the Seashore be required to FOLLOW THE LAWS set forth in the Organic Act of 1916, and in the PRNS and GGNRA statutes. These make it very clear that the purpose of the seashore and the rest of GGNRA lands is to protect the natural resources and leave no impairment of the land. We would like the park to show proof that they are doing everything possible to "conserve the scenery, natural and historical objects, and wildlife in the system, and to provide for the enjoyment of these by the public and leave them unimpaired for future generations." These large ranches with extensive unfriendly-to-wildlife fences are much closer to being CAFO's than "historical" artifacts, and they have definitely expanded the need for roads and new infrastructure, all of which is being funded by the public through our taxes. It is time we have a say in how all these taxes are being used.

The Park Service has never studied the environmental impact of ranching here, and now that many groups are calling attention to this deficit of knowledge and information, it is time that they seriously look at the immense damage that is occurring here. They need to make a commitment to either preserving this park for the public benefit, or managing it for industrial agriculture. We are asking for scientific evidence and an open discussion with the public.

Sincerely,

Linda Swartz Cazadero, CA

From: Susan Fischer <sue\_rd\_badger@yahoo.com>

Sent: Thursday, March 25, 2021 3:24 PM

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

Subject: Re: Agenda Item CD-0006-20 (NPS, Point Reyes GMPA)

Dear Commission Members,

I write to you again concerning the General Management Plan for Pt. Reyes National Seashore. Alternative B is destructive of water quality and habitats and is not consistent with the California Coastal Act. Please do not accept the NPS submission of consistency.

The ranches and dairies at PRNS have proven to be poor stewards of the land. It is no secret that the manure from these ranches and dairies runs into the creeks and streams within the Seashore and eventually makes it way to the ocean. The ranches and dairies are aware of their lack of compliance in managing water quality, yet they take no action to mitigate the problem. Although, one wonders how they could possibly mitigate this problem given the vast amounts of manure generated annually. The Park Service does not appear to be concerned with the water quality, as they allow the contamination to continue. It is my understanding that the ranches and dairies are asked to do their own water testing. This doesn't appear to be working. What is their motivation to report that they are contaminating the water? Recent water testing by an independent source revealed high levels of fecal coliform in wetlands and creeks draining the ranches and dairies at PRNS. This water makes it way to beaches within our National Seashore that is habitat for wildlife and used by the public.

Ranching and dairy operations at PRNS are harmful to the watershed and coastal environment and are not consistent with the standards set forth for our National Seashore. The ranching and dairy operations should not be allowed to continue within PRNS. They were paid to leave and it is time for them to do so. Please do not accept the NPS submission of consistency.

Sincerely,

Susan Fischer  
2735 Cherry Lane  
Walnut Creek, CA 94597

March 24, 2021

To: California Coastal Commission

RE: Agenda Item CD-0006-20 (NPS, Point Reyes GMPA); 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 Coastal Commission staff report filed October 16, 2020 recommended a conditional consistency concurrence for the National Park Service General Plan Amendment for Point Reyes National Seashore to postpone extending ranch leases in order to address surface water quality violations of fecal coliform and other pollutants emanating from ranches to Pacific coastal drainages. This seems like a good recommendation that is an easy lift for the National Park Service since their staff have already developed and partially implemented the plan described in National Park Service report by Ketcham (November, 2001 *PRNS Water Quality Monitoring Report May 1999 – May 2001*):

**Table 3. Sample Event Matrix**

	<b>Fall</b>	<b>First Flush</b>	<b>Winter</b>	<b>Storm samples</b>	<b>Spring</b>	<b>Summer</b>
<b>When</b>	October	Weather dependant Nov-Jan	Weather Dependant December-March	December – March	April	July
<b>Where</b>	All sites	All Sites	All Sites	Dairy district, degraded subwatersheds	All Sites	All Sites
<b>Sample Objective</b>	Fall base flow Temperature and DO	Initial pollutant load from upland areas – nutrients, pathogens, & sediment	Winter discharge, nutrients, sediment, and pathogens	Site specific sampling for pathogens, sediment, nutrients and ammonia.	Spring baseflow-nutrients and pathogens	Summer flow, identify low flow conditions. Temperature and DO
<b>Collection type</b>	Single Day	Single day	Single Day	Single Day	Single Day	Single Day
<b>Planning</b>	Advance notice to Lab	Unplanned – 24 hour notice to lab	Unplanned – 24 hour notice to lab	Unplanned - 24 hour notice to Lab	Advance notice to Lab	Advance notice to Lab
<b>Staffing</b>	4 people	4 people	4 people	2-4 people	4 people	4 people

This monitoring plan improves on the monitoring that was conducted (but discontinued in 2013) in that it includes sampling locations throughout the Pacific drainages from Kehoe, to Drakes Estero and Drakes Bay. It also provides representative temporal coverage of water quality, although it has the drawback of only obtaining six samples per year. This is an issue because most fecal bacteria standards are based on analysis of five samples collected during a thirty-day period. This is reasonable for public waste water treatment plants which are required to monitor their discharges frequently to verify the efficacy of their treatment processes. At

Point Reyes National Seashore there are no treatment facilities for cattle waste entering surface water. Therefore, either the park/ranchers need to sample surface water more frequently or single samples collected during storm events should be compared to the current standards for five/30-day sampling in order to assess threats to human health and native wildlife and take appropriate action.

In addition to the recommendations of Coastal Commission staff, the conditional approval should also include:

- An analysis of the causes of water quality impairment from each ranch,
- A description of additional actions that will be taken to ensure compliance with water quality standards,
- Documentation of implementation of actions,
- Follow up water quality monitoring to determine the effectiveness of the additional actions, and
- Description of the enforcement actions the NPS will take if the ranchers continue to fail to comply with water quality standards and protect the health of visitors to the seashore.

All reports should be made available for public review and comment on the NPS web site.

Thank you for your consideration of these suggestions to bring Point Reyes National Seashore into conformance with our California Coastal Act.

Sincerely,

Elizabeth Dodge  
Environmental Scientist  
Berkeley, CA 94708

**From:** Catherine Portman <cportman@gmail.com>

**Sent:** Wednesday, March 24, 2021 6:22 PM

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

**Cc:** Craig\_Kenkel@nps.gov; Brannon <Brannon\_Ketcham@nps.gov>

**Subject:** Deny Consistency Determination for Point Reyes National Park Service Plan

I urge you to deny the National Park Service's request for consistency determination for their proposed plan to continue discharging tons of cow manure (and increase livestock) into the streams and onto the land that runs into the ocean at Point Reyes National Seashore..

Water testing by the NPS in 2013 (their most recent effort to determine water quality) showed exceedances of coliform bacteria. A Water Quality Board letter from O'Hara said BMP would **not** resolve the water contamination and the proposal for additional livestock would exacerbate the problem.

Decades of NPS management of PRNS as a concentrated animal feedlot, has rendered PRNS a cattle sewer. The waters are so polluted steelhead and salmonids cannot use the streams. The manure drains into the ocean and renders the Eelgrass beds uninhabitable.

Please stand with your commitment to preserve California's seashores and deny consistency determination for the NPS management plan for PRNS. All the science data supports this decision.

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Catherine Portman  
14841 County Road 91 B  
Woodland, CA 95695  
530-666-0882

**From:** JULIE PHILLIPS <[tuleelk@comcast.net](mailto:tuleelk@comcast.net)>  
**Sent:** Thursday, March 25, 2021 9:48 AM  
**To:** Weber, John@Coastal <[john.weber@coastal.ca.gov](mailto:john.weber@coastal.ca.gov)>  
**Subject:** GMP Alternative B for PRNS

March 23, 2021

To the California Coastal Commissioners and staff:

Dear Commissioner:

**The General Management Plan (GMP) for Point Reyes National Seashore (PRNS), Alternative B**, will continue past and current practices which are destructive to the environment including the water quality within the park. In addition, the past and current practices within PRNS continue to degrade the native habitat and landscape and have a negative impact on the native wildlife including loss of habitat.

The **GMP, Alternative B, is not consistent with the California Coastal Act**. In light of these inconsistencies and the ongoing degradation of the water, air and lands at PRNS, please do "not accept" the NPS submission of consistency.

The water quality is not acceptable based on the past and current domestic livestock operations within PRNS. These long-term poor practices will continue to degrade and destroy habitats which threaten more native species.

PRNS is one of the most degraded landscapes in California and within our National Park System. The past and current livestock grazing practices and other activities related to those operations have severely impacted the watershed, the coastline area and the native species within and adjacent to the park.

Please Commissioners - vote against the National Park Service's submission of consistency. I also request that the Superintendent add my letter/comments to the GMPA administrative record because this letter is relevant to the GMPA process.

Respectfully submitted,  
Julie Phillips  
Tule Elk Biologist & Environmental Scientist/Educator  
Email: [tuleelk@comcast.net](mailto:tuleelk@comcast.net)



James Coda  
2009 Falcon Ridge Drive  
Petaluma, CA 94954

March 24, 2021

VIA EMAIL

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

Re: Agenda Item CD-0006-20 (NPS, Point Reyes GMPA); 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 Commission Members:

By letter dated December 31, 2020, I provided comments on the staff's  
October 16, 2020, report concerning the National Park Service's (NPS's)  
CD. My comments all involved amendments to the language of the  
three staff-recommended conditions and I added a fourth condition.

I now have a couple of additional comments on that report.

The staff report states at pages 5-6 as follows:

Within the GGNRA portion of the planning area, which  
drains into Tomales Bay, designation of Tomales Bay as an  
impaired body for pathogens has resulted in a significant  
effort to assess water quality in the upstream watersheds . . .  
After years of work to address water quality in Tomales Bay,  
recent water quality monitoring data indicate that water  
quality standards for pollutants related to ranching  
activities are generally being met. In addition, the GMPA  
includes enhanced water quality protection measures related  
to ranching. Therefore, for the GGNRA portion of the GMPA  
planning area, staff believes there is evidence that the

GMPA would be consistent with Coastal Act policies regarding protection of marine resources and water quality.

(Emphasis added.)

It's not just Tomales Bay that is impaired. Lagunitas Creek, which is partially on NPS lands, and Olema Creek, which is entirely on NPS lands, flow to Tomales Bay and they are also impaired. Furthermore, Tomales Bay and the two creeks are not just impaired for pathogens. They are impaired for nutrients and sediments as well. There are many sources for this need to correct the staff report. For example, the SFRWQCB, which is the regulating agency for the waters of Tomales Bay and the two creeks, stated as follows in its September 20, 2019, letter commenting on the Draft EIS for the GMP Amendment that is the subject of the CD:

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.

[https://www.nps.gov/pore/getinvolved/upload/planning\\_gmp\\_amendment\\_deis\\_public\\_comments\\_5027-7624\\_200302.pdf](https://www.nps.gov/pore/getinvolved/upload/planning_gmp_amendment_deis_public_comments_5027-7624_200302.pdf) Comment #7018 at page 644 of public comments.

The rest of the staff report language quoted above is also in conflict with the SFRWQCB's language quoted above. There is no basis for stating that water quality standards are generally being met in Lagunitas and Olema Creeks when the water board still lists them as impaired for all three categories of water pollution, namely pathogens, nutrients and sediments.

Condition 3 contains a factual error that is very easy to correct. The third sentence in condition 3 assumes Olema Creek is in GGNRA. That is mostly incorrect. While it begins in GGNRA, it quickly crosses under Highway 1 at Mill Gulch and thus becomes part of PRNS. It remains part of PRNS except for a short turn back to GGNRA in the Five Brooks

Ranch area and then it quickly crosses back to PRNS land where it remains for the rest of its travel. The creek can be seen on Google Earth on Web or Google Maps. The matter can be easily corrected by adding the words “PRNS and” in the middle of the third sentence before “GGNRA” as shown below:

Annual reports shall also include results of continuing water quality monitoring of the **PRNS and** GGNRA portions of the Tomales Bay watershed (i.e., Olema and Lagunitas Creeks).

Sincerely,

s/James Coda

**From:** Dennis Fischer <dennis.j.fischer@gmail.com>

**Sent:** Tuesday, March 23, 2021 3:19 PM

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

**Subject:** Comments on the CD for PRNS GMP

I have written to you previously and would like to reiterate my opposition to the General Management Plan for Pt. Reyes National Seashore, Alternative B as it is destructive in my view. The ranching and especially the dairy businesses operating in the Pointe Reyes National Seashore have repeatedly demonstrated a complete lack of compliance in managing water quality. The Park Service has repeatedly demonstrated that they are unable to monitor and manage water quality degradation from the ranching and dairy operations or institute BMPs that can address and improve water quality. Therefore, in light of these repetitive and ongoing violations, it's clear that ranching and dairy operations in Point Reyes National Seashore are harmful to the watershed and coastal environment. These operations within a national seashore should not be allowed to go forward let alone expand. Climate-conscious consumers looking to the future are right now shifting the food production landscape to become more plant-based. Dairy milk and other animal product are over-produced and their consumption is going down. Vote for the future and not the past! The CCC should vote against the NPS submission of consistency.

Thank you.

Sincerely,

Dennis Fischer

**From:** Lonna Richmond <lonnajean@gmail.com>

**Sent:** Tuesday, March 23, 2021 8:52 AM

**To:** Weber, John@Coastal <john.weber@coastal.ca.gov>; Simon, Larry@Coastal <Larry.Simon@coastal.ca.gov>

**Subject:** PRNS Water Quality

Dear Commissioner,

I have written to you before and I want to reiterate what I know you'll be hearing from many, the General Management Plan for Pt. Reyes National Seashore, Alternative B, is destructive. The water quality was not, and is not now, ACCEPTABLE. It will destroy habitats and we will lose more species and in the light of the climate crisis, it is just the wrong approach. The CCC should vote against the NPS submission of consistency.

In all honesty, I don't see how any one of you on this Commission could support these businesses operating in our National Seashore. They have shown a complete lack of compliance when it comes to caring for these special lands. That they have zero respect for what many of us hold sacred, is reason enough to send them packing - which means taking their cows and their equipment to their other ranch holdings outside our Park. My goodness, they've been paid to leave and yet they continue with the support of agencies like yours.

Please stand up for what you must know to be true. The businesses don't deserve to be there, they aren't fulfilling their end of the bargain and they are taking down a beautiful ecosystem and many endangered species with them. All that's left will be cows and bare soil and what can never be created again will be gone, for a few families and their "local" meat. Such a waste.

Sincerely,  
Lonna Richmond

## Theresa Harlan

March 22, 2021

California Coastal Commissioners and Staff:

Re: Consistency Determination No. CD-0006-20, U.S. NPS/PRNS

My mom, Elizabeth Campigli Harlan (1925-1998) and grandmother Bertha Felix Campigli (1882-1949) can't speak up for themselves nor can the many Coast Miwok ancestors who are buried at PRNS or whose remains were removed from their homelands. As my mother's daughter and Native American stakeholder, I can advocate for my family. I can fight to protect my family's ancestral legacy as Coast Miwok people –who despite the greatest attempts to annihilate and erase them, continued to know themselves as Indians, Tomales Bay Indians (known as Coast Miwok).

I am in opposition to the NPS/PRNS plan to expand and diversify ranching at PRNS/GGRNA due to the harmful impact of ranching on historic, archeological and sacred sites of the Coast Miwok people, the damaging effect on native plant and animal life, the unacceptable levels of E.Coli and Enterococcus fecal bacteria at Abbotts Lagoon, Kehoe Lagoon and other waters, and the glaring imbalance of influence and celebration of ranching while Coast Miwok history and presence remain in the shadows.

I submitted comments for the last California Coastal Commission (CCC) Staff Report re Consistency Determination No. CD-0006-20 on the NPS/PRNS General Management Plan Amendment. I appreciate the work of the California Coastal Commission staff. Below are recommendations for the next staff report. I respectfully urge CCC to:

- 1) Utilize the principle elements (e.g., Respecting Tribal Concerns, Meaningful Engagement, Coastal Access, Climate Change and Habitat and Public Health) of the CCC Environmental Justice Policy to “empower the public’s full participation in the land-use decision-making process that protects California’s coast and ocean commons for the benefit of all people.”
- 2) Begin staff reports with the acknowledgement of the first peoples of California, in this case, the Coast Miwok people. Coast Miwok history is from time immemorial and on an archeological timeline can be traced back to 10,000 years. It predates the 19th century European immigrant settler ranch history and the Congressional establishment of PRNS and GGNRA.
- 3) Consult with a greater number of California Indian people for comment regarding this consistency determination. Neighboring California Indian peoples such as Pomo, Wappo and Ohlone peoples historically traded with Coast Miwok people and still travel to the coast to collect traditional foods such as sea weed. There is a wide California Indian interest in issues such as a healthy biodiversity of plant and animal life at PRNS and shared ancestral lineage with Coast Miwok people.
- 4) Consider cultural resources management experts such as Lynn Compas who studied Coast Miwok sites and warned that Park and ranch roads, grazing cattle, construction of park and ranch facilities, and vandalism are damaging to archeological sites.
- 5) Examine the institutional racism and bias that continue to influence NPS management decisions and cultural resources management. In the paper, “Categorical Denial: Evaluating Post-1492 Indigenous Erasure in the Paper Trail of American Archeology” authors Lee M. Panich and Tsim Schneider call for

Page 2, Harlan, March 22, 2021

change “Taken together, the identification of sites used by Indigenous people after the arrival of Europeans is part of a broader effort to reverse terminal narratives and what has become an increasingly segregated past.” Panich and Schneider even further note “overlooked evidence of recent occupation” [such as my grandmother’s home] as, “One particularly egregious example . . . recorded by Bryant in 1934. He describes ‘broken mortars’ and a ‘good specimen of spear head’ in the artifact description and casually mentions that an ‘Indian woman, [Bertha] Campigli, has lived on this site for many years’”.

6) Check with the California State Office of Historic Preservation regarding the status of the Point Reyes Peninsula Indigenous Archeological District as referenced in the December 2020 CCC Staff Report, page 78. Considered what is notable history and archeological significant and what is not. The NPS/PRNS website celebrates the listing of the Point Reyes Peninsula and Olema Valley Dairy Ranches Historic Districts ([https://www.nps.gov/pore/learn/news/newsreleases\\_20181113\\_ranches\\_national\\_register\\_of\\_historic\\_places.htm](https://www.nps.gov/pore/learn/news/newsreleases_20181113_ranches_national_register_of_historic_places.htm)) and Drakes Bay Historic and Archeological District in the National Register of Historic Places ([https://www.nps.gov/pore/learn/news/newsreleases\\_20161012\\_drakes\\_nhl\\_dedication.htm](https://www.nps.gov/pore/learn/news/newsreleases_20161012_drakes_nhl_dedication.htm)). You will not find the same celebratory press releases for the Point Reyes Peninsula Indigenous Archeological District. It is odd that NPS/PRNS secured National Register of Historic Places listings for ranches before Coast Miwok archeological sites—sites at risk due to ranching.

Theresa Harlan

Theresa Harlan (Kewa Pueblo/Jemez Pueblo) is the adopted daughter of Elizabeth Campigli Harlan (Coast Miwok) who was the great-granddaughter of Euphrasia Felix, granddaughter of Paulina and Joseph Felix, and daughter of Bertha Felix and Arnold Campigli. Elizabeth and her seven half-siblings (Victor Sousa, Lawrence Sousa, Eugene Gusman, Frank Gusman, Delphina Pozzi, Elaine Pozzi and Gilda Pozzi) were raised in the home built by their grandfather Joseph Felix at Laird’s Landing on the western shores of Tomales Bay.

**From:** Jonah Myron <jonahmyron@yahoo.com>

**Sent:** Friday, March 19, 2021 12:56 PM

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

**Subject:** protect the elk

I am disgusted to learn that my tax dollars are being used to PREVENT wild animals from being allowed to drink water, thus forcing them to a long and painful death by dehydration! Shame on you! Get it together! Private farmers have NO RIGHT to infringe upon the wild animal populations, nor do they have the right to pollute the coast.

Thank you kindly,

Valerie Polacek



**From:** Ken Bouley <[kbouley@fico.com](mailto:kbouley@fico.com)>

**Sent:** Monday, March 22, 2021 10:57 AM

**To:** Weber, John@Coastal <[john.weber@coastal.ca.gov](mailto:john.weber@coastal.ca.gov)>; Teufel, Cassidy@Coastal <[Cassidy.Teufel@coastal.ca.gov](mailto:Cassidy.Teufel@coastal.ca.gov)>; Tagab, Clarita@Coastal <[Clarita.Tagab@coastal.ca.gov](mailto:Clarita.Tagab@coastal.ca.gov)>; Simon, Larry@Coastal <[Larry.Simon@coastal.ca.gov](mailto:Larry.Simon@coastal.ca.gov)>; Luster, Tom@Coastal <[Tom.Luster@coastal.ca.gov](mailto:Tom.Luster@coastal.ca.gov)>; Krygsman, Vail@Coastal <[vail.krygsman@coastal.ca.gov](mailto:vail.krygsman@coastal.ca.gov)>; Huckelbridge, Kate@Coastal <[Kate.Huckelbridge@coastal.ca.gov](mailto:Kate.Huckelbridge@coastal.ca.gov)>; Barrera, Alexis@Coastal <[Alexis.Barrera@coastal.ca.gov](mailto:Alexis.Barrera@coastal.ca.gov)>

**Cc:** NorthCentralCoast@Coastal <[NorthCentralCoast@coastal.ca.gov](mailto:NorthCentralCoast@coastal.ca.gov)>

**Subject:** Some background regarding the Point Reyes National Seashore General Management Plan Amendment and EIS

Dear California Coastal Commission Members of the Energy, Ocean Resources, and Federal Consistency Program,

I'm writing to share some information and perspective about the upcoming consistency decision on the Point Reyes ranching plan. I live right along the Park and care about it deeply. The information I share is in the form of an article I recently published in the Wildlife News, the link and the text are below.

I realize the charge of the Commission is formal and strictly guided by law. I believe the Preferred Alternative B will eventually be found illegal under the Organic Act and the PRNS founding legislation, which I realize are not the purview of the CCC. Anyway, I do not offer a technical or legal argument, as such, against a finding of consistency; I just offer some background and context which might be useful, or at least interesting.

I am very willing to discuss any aspect of the issue covered below with any CCC member, formally or otherwise, in any venue.

Thanks in advance.

Sincerely,

Ken Bouley

34 Drakes Summit Road  
Inverness CA 94937

[kbouley@fico.com](mailto:kbouley@fico.com)  
(415) 259-1332

Link: <https://www.thewildlifeneeds.com/2021/03/18/point-reyes-national-something-or-other/>

**Text:**

**Point Reyes National Something-or-Other**

"What's in a name? That which we call a rose, by any other name would smell as sweet."

What should we call the diverse, wild, inspiring but scarred peninsula sliding very slowly past us, jurisdictionally in West Marin County, California, but geologically across the San Andreas Fault, on the Pacific Plate, going steadily its own way, namely Northwest? Should we call it Point Reyes National *Park* or Point Reyes National *Seashore*?

Technically, the latter is correct. And it really shouldn't matter. But it seems to matter a lot to some people, and understanding why tells a story.

First, in case you don't know, Point Reyes National Seashore (PRNS) is an area of about 71,000 acres whose beauty, richness, and diversity are difficult to overstate. The only National Seashore on the West Coast, surrounded by the Greater Farallones National Marine Sanctuary, it contains a genuinely unique roster of habitats: ancient conifer and mixed forests, coastal prairie, wind-swept chaparral, verdant canyons, riparian corridors, sandy and rocky beaches, fresh and saltwater estuaries, marshes, mudflats, intertidal zones, dunes, and lagoons. Flora includes 750 species, including ~20% of all California natives. Unsurprisingly, these habitats support veritable arks of wildlife: mountain lions, coyotes, bobcats, badgers, mountain beaver, two species of weasel, river and sea otters, fox, deer, elk and others. The Park is along the Pacific Flyway and almost half of all North American Bird species, nearly 500 in all, are recorded there. There are seven species of bat. On the coastline and offshore are seals, including elephant seals, sea lions, eight types of dolphin and two kinds of porpoise, 18 species of whale, seven species of shark including the greatest concentration of great whites anywhere. The preceding list of lists is incomplete. There are over 50 species registered as threatened, rare, or endangered at the state or federal level. [\[1\]](#)

I visit the park often and rarely does one leave without witnessing something wonderful and wild. Ever see a badger stare down two coyotes over a recently caught gopher? Or a Belted Kingfisher splash down in a lagoon to avoid a pursuing Peregrine Falcon? Or a Great Horned Owl scatter a covey of California Quail like confetti into the beach lupine? Or a family of river otters swim out of one creek, frolic up-beach in the surf, and then waddle up the dunes again and into the next creek, as if on a schedule? Or an American Bittern drowning a just-speared vole and shaking it to make sure? Or a bobcat and a coyote sitting a few feet from each other with no apparent tension? I have.

And all this is without an entrance fee, just an hour or so from San Francisco and Oakland, even accessible via public transportation, making such experiences reachable to many who don't or can't travel to places like Yosemite or Yellowstone.

Second, for your information, the Seashore is currently and seemingly continually enmeshed in controversy. The briefest of timelines is given to provide context to what follows:

Ranching has existed on the peninsula since the mid-1800s. Previously, the land was occupied by the Coast Miwok people for thousands of years. The Park was formed on paper in 1962. Over the subsequent few years, the government purchased land from the ranchers to assemble the Park, extending them Reservations of Use and Occupancy (ROU) — effectively the right to stay on and work the land for a specified duration. In 1978, the Park's charter was amended to allow the National Park Service (NPS) to extend leases for continued ranch use, regardless of the status of the original

ROUs.<sup>[2]</sup> Depending on whom you listen to, ranching was meant to be part of the Park in perpetuity, or the ROUs were transitional, sweetening the purchase agreements but known to be temporary. Again, depending on whom you listen to, the ranches in Point Reyes are either laudable stewards of the land, or lamentable sources of greenhouse gases, water contamination, invasive species, erosion, and habitat loss (or, of course, somewhere in between, but views are polarized.)

Also in 1978, a small herd of tule elk, a California endemic species once very near extinction, was brought to Point Reyes to establish a preserve inside the Park on Tomales Point, behind an eight-foot fence stretching from the Pacific to Tomales Bay. Two free-ranging herds have since been established outside of the fenced reserve, in the southern part of the Park. PRNS is the only National Park with tule elk. Currently there are approximately 600-700 elk in total in PRNS and about 5,500 cows. During the drought of 2013-2015, several hundred elk died behind the fence in the preserve, whereas the free ranging herds grew over this time. <sup>[3] [4]</sup>

The NPS was sued in February of 2016, and in the settlement was compelled to produce an Environmental Impact Statement (EIS) and update its management plan for ranching inside the Seashore. The draft plan and EIS were released in August 2019, public comment collected, and a final EIS published in September 2020. The EIS includes six management options, including *Alternative B* which extends 20-year leases to the ranches and expands and diversifies their permitted commercial activities, and *Alternative F* which phases out all ranches and dairies over five years. Alternative B is identified as the “preferred” alternative by NPS and is favored by the ranching community, whereas Alternative F is supported by various citizen and environmental groups. The final decision is imminent and might beget more lawsuits.

The reader is now more or less caught up on what’s going on and what’s at stake. Now here is the latest twist:

On February 9, 2021, the Seashore distributed an email entitled “Corrections to Media Coverage on the General Management Plan Amendment,” in which they explained “the National Park Service would like to make sure you have the most factual information available.” The email enumerated eight corrections, all aimed at Peter Byrne’s article, *Apocalypse Cow: The Future of Life at Point Reyes National Park* published in the Pacific Sun on December 9, 2020. <sup>[5]</sup>

Byrne’s article is very much worth reading and is highly critical of the NPS’ preferred plan, which will expand and entrench commercial livestock operations in the Seashore, despite the documented environmental damage done by the ranches and dairies (think methane, E. coli, soil erosion, invasive species, habitat degradation, etc.) The plan is wildly unpopular with the public, because, among other things, it provides for the immediate killing of dozens of native tule elk and schedules their ongoing culling, on behalf of the ranchers in the park, who see the elk as competition for pasture.

Byrne and the Park independently confirm that the Park communicated a version of its putative corrections to Pacific Sun before publication, and that its editors replied indicating the story was factually correct and offered to meet with the Park and provide a detailed response. The Park did not reply to the offer, nor did its public allegation of errors acknowledge that the offer had been made. <sup>[6] [7]</sup>

As for the nature of the corrections, I brought significant bias as a reader, but they seemed to me *obtuse*, as when the Park refutes Byrne’s claim that the ranchers agreed to leave after 25 years by citing the 1978 legislation allowing continued leases, which is not contradictory; or *obscurantist*, as when the

Park claims Byrne's oft-cited figure for how much the Park paid the ranchers when purchasing their land (\$382 million, adjusted) is wrong, without supplying the correct figure; or *defensive*, such as where the Park points out that the elk in 2013-15 die-off did not succumb from thirst, but rather from drought-induced malnutrition, and adding the biologically implausible statement, "if there was no water available to the elk at this time, all of the elk would have perished." (I'm not a biologist, but this is wrong: lack of water will take the most vulnerable to dehydration first, not 500+ animals simultaneously, and it is known that there are sub-herds north of the fence, with territorial behavior, such that water might have been available to only a subset of the animals based on distribution.)

If it seems unusual to you for a government agency to first decline to meet with a journalist and subsequently blast an email pleading its case, you're right. Laura Cunningham, California Director of the Western Watersheds Project (WWP), said, "I have never seen a federal agency spend so much time and effort critiquing a single reporter and specific article in such detail and then publicly." [\[8\]](#)

So what's going on here? To return to Shakespeare, "Methinks the lady doth protest too much."

Let's take one more of the eight corrections from the Park's email, ostensibly the most innocent and factual:

*The name of the park is "Point Reyes National Seashore," not "Point Reyes National Park."*

Harping on that last word would be merely pedantic, except for the fact that the Point Reyes ranchers have long implied that Seashores fall under different laws and policy than Parks, presumably in an attempt to inoculate themselves against charges regarding their legal and ecological status. For example, a July 22, 2020, op-ed in the *Marin Independent Journal* from Point Reyes rancher Kevin Lunny claims, "PRNS is not a national park. Where parks are created for quieter, contemplative uses, national seashores are for public activities, recreation and historic cultural uses." [\[9\]](#) Additionally, a 2014 scoping letter from the Point Reyes Seashore Ranchers Association (PRSRA) to the Park says, "... PRNS is a "National Seashore," not a "National Park." PRSRA asks that all [Environmental Assessment] documents, publications and communications be corrected...this error, if not corrected, could cause the public and consultants to apply the wrong standards to this environmental review." [\[10\]](#)

Whereas you can be sure that the Ranchers Association was not worried about the operative standard being too low, there simply *is no such distinction*; "Seashores" and "Parks" are both "National Park Units" and are subject to the same laws, for example the Organic Act of 1916, which requires the National Park Service to "manage park resources and values in such manner and by such means as will leave them unimpaired for the enjoyment of future generations." [\[11\]](#) In addition, the PRNS Enabling act, specific to this Park/Seashore/Park Unit requires the land to be administered "supportive of the maximum protection, restoration, and preservation of the natural environment within the area..." [\[12\]](#)

So a bystander may wonder why the Park is taking pains to underline the basis for such a self-interested obfuscation, rather than correct the actually-substantive inaccuracy in the first place — which, as far as the author is aware, they have not done, publicly or otherwise. Why are they being faithful to a six-year-old request from the Ranchers' Association to correct "Park," which is common usage, confusing no one, and technically equivalent? In other words, why is the Park telling Byrne he is wrong instead of the ranchers?

And a cynic may supply the answer: because the distinction is rhetorically useful to certain interests and the NPS works for the ranchers. If that sounds *overly* cynical, towards paranoid, read on.

The controversy did not start with *Apocalypse Cow*, of course.

The West Marin community is still agitated by the “Oyster War,” culminating in 2013, when the Drakes Bay Oyster Company, run by Mr. Lunny, shut down after the Park Service declined to offer a lease at the expiration of a 40-year ROU, the balance of which Lunny had purchased from the former operator, Johnson Oyster Company. The Park Service stated that issuing a lease for the business to continue would have been illegal in designated potential wilderness. Site clean-up cost \$4.5 million, paid for by the National Park Service and the National Park Foundation. <sup>[13]</sup>

There is also the mentioned recent lawsuit and resulting EIS, which cost nearly \$1.5 million to generate, and the General Management Plan, including the preferred Alternative B, which as mentioned is decidedly opposed by the public. As part of the scoping process for the Plan, the Park Service was legally obliged under NEPA to accept public comments. More than 7,600 comments were received. They are available online from the NPS. <sup>[14]</sup> The author was personally involved in an analysis of the comments done by the Renewal Resource Institute. The analysis shows that over 91% (6,969) of the 7,627 respondents opposed Alternative B on various grounds. Of all public comments which endorsed any specific plan explicitly (1,859), over 94% (1,751) endorsed the plan that removes ranching altogether (Alternative F). <sup>[15]</sup> Further indication of the public’s will regarding the way forward in the Park is found in the public comments submitted to the California Coastal Commission, which has yet to render a “determination of compliance” on the plan. (The Coastal Commission cannot block the plan, but a finding of non-compliance would be awkward for the Park and would encourage opposition.) The staff report indicates that the overwhelmingly majority of comments were opposed to the plan, especially regarding the culling of tule elk. <sup>[16]</sup>

Lastly, many advocate groups such as forelk ([link](#)), Save Point Reyes National Seashore ([link](#)), In Defense of Animals ([link](#)), et al, have joined the lawsuit’s plaintiffs (Resource Renewal Institute (RRI), Western Watersheds Project (WWP), and the Center for Biological Diversity (CBD)), and are trying to raise awareness of the contents of the plan. This effort is making headway despite the massive news shadows cast by covid-19, the election, capital riots, and the like, and despite the impressively disciplined “there’s-nothing-to-see-here” stance from status quo politicians and organizations sympathetic to the ranch families. It’s not surprising, for example, that if well-respected and normally green U.S. Representative Jared Huffman routinely portrays PRNS as a popular model of balance and sustainability (“a unique mosaic which most people love pretty much the way it is” <sup>[17]</sup>) despite the lopsided and unequivocal counterevidence, that those trying to block the unfortunate plan have a long row to hoe. CBD, for example, strongly opposes Representative Huffman on this issue, but works with him on too many other public-lands protection and conservation matters to withhold their endorsement from him. Besides, he faces no serious challenge for his seat, as of now.

So, *Apocalypse Cow* can be read as an exposé, trying against long odds to keep the dice uncast, and the Park’s “corrections” email can be read as a counter-tactic, seeking to mute those voices and discredit those concerns.

President Trump, recall meanwhile, invited Kevin Lunny to the White House in October, 2019, for an executive order signing ceremony giving access to private corporation profit from public land, where in reference to the “Oyster War,” they commiserated on the lamentable past abuses of big government of

struggling, small businessmen like himself. During the photo-op, President Trump told Mr. Lunny, “We’ll have somebody right here in the White House looking at it, Kevin, so this doesn’t happen to other people.” <sup>[18]</sup>

The rest of Mr. Lunny’s referenced op-ed to the Marin Independent Journal last July is also worth reading, where he unabashedly pines for the days when he and his family could hunt and fish as they please in what is now a National Park, add “any species of farm animal we wanted,” and “use the sand dunes,” etc. Mr. Lunny makes explicit his desire to return to the Shafter-era model of land use, namely 1860-1960, but omits any reference to the antecedent genocide of the former Native American inhabitants of the area, the rampant clear-cutting of the coastal conifer forests and decimation of the coastal prairies, vestiges of which can be seen in the elk preserve and other unranching areas of PRNS, to make way for livestock, or the extirpation of elk and grizzly and general domination of wilderness by our glorified frontier endeavors.

Another document worth reading on the topic is the aforementioned 2014 letter written by the Point Reyes Seashore Ranchers Association, delivered to then-Superintendent Cecily Muldoon and copied California Senators Feinstein and Boxer, Representative Huffman, State Assembly Member Marc Levine, and then-Marin County Supervisor Steve Kinsey. The letter is indeed worth reading, but then again one might save the time if one has already read the Park’s “preferred” Alternative B, for which the letter served as an apparent blueprint. It’s a brazen letter to Santa Claus, specifying what should be used as the environmental baseline (current day operations), what Park Unit elsewhere should be used as a model (Cuyahoga Valley National Park in Ohio), how long lease renewals should be (20 years) what should become of the lease succession policy (less restrictive), what activities should be expanded or newly allowed (poultry, sheep and goats, including guard animals, row crops, retail shops and farm stands, tours, B&Bs, onsite butchering, food-processing, including from produce brought in from elsewhere, cheese-making, et al.) It also characterizes the native tule elk as an invasive nuisance and implies that “overpopulated elk” may transfer Johnne’s disease to cattle, when it is well known that the domestic livestock are from where the elk contracted the disease originally. (The disease in the elk, by the way, makes their relocation implausible and strengthens the case for culling them over any more humane or ecologically sound way forward. <sup>[19]</sup>)

Into this ever-fresh pile steps new PRNS Superintendent Craig Kenkel, who most recently was head of — wait for it — Cuyahoga Valley National Park in Ohio — another on the short list of National Park Units which incorporates for-profit, private use of public lands and which utilized federal sharpshooters to cull deer populations, which is the likely fate awaiting scores of tule elk in PRNS. Superintendent Kenkel gave a careful interview to the Point Reyes Light last December <sup>[20]</sup> in which he said, “everyone has a right to be heard” and later added, “farming is in my DNA.” He was named last November by scandal-ridden extraction and agriculture lobbyist-cum-Trump Interior Secretary David Bernhardt and appears to be handpicked in the background by the ranchers (so much for everyone being heard.) Superintendent Kenkel started in January, so the February 9<sup>th</sup> “corrections” email came out on his watch. One wonders whether the “corrections” email went out without his knowledge, at his direction, or against his wishes, as well as which possibility reflects least poorly on him.

If you’re keeping score at home, the Ranchers’ Association, in 2014, before the court-ordered Environment Impact Statement, petitioned the Park regarding what moniker to permit, what length of leases to offer, what commercial activities to allow, and who to put in charge, and the Park has obeyed on each point and in high fidelity, entirely heedless of overwhelming objections from the owners of the land (the public).

Those of us who want our National Park to be a healthy haven rather than a heavily impaired livestock operation take heart in the promise offered by the incoming Biden administration, which has pledged to make climate change a top priority, which nominated a Native American woman as Secretary of the Interior, and which will bring science back into environmental policy, spelling an end to alternative facts and the persistent upper hand for the entrenched and powerful. PRNS should be swept up and turned around as part of 30 x 30, the new administration's plan to protect 30% of U.S. land and coastal seas by 2030.<sup>[21]</sup>

Furthermore, we continue to press our case. Western Watersheds Project, one of the 2016 lawsuit plaintiffs, along with In Defense of Animals, recently conducted independent tests of water quality downstream from some of the ranches in PRNS, at popular public-accessed streams and beaches, including Kehoe Lagoon, which drains into the Pacific. The Park has not done water quality tests since 2013, for reasons withheld, even though there were significant bacteria and other issues found at that time. The new results, published March 3, 2021, show 5X the safe human limit of coliform bacteria, 40X the safe limit for *E. coli*, and 300X the safe limit of enterococci. As of this writing, PRNS has acknowledged receipt of the study results but has not indicated any planned response, such as placing a sign to warn the public.<sup>[22]</sup>

What should be done at a minimum, in the authors opinion, is a deferral of the deadline for a finalized plan, allowing public hearings at which previously ignored voices, such as those of the Coast Miwok, can be heard; at which the owners of the land (the public) can express their will to decision-makers without any chance of genuine or feigned misunderstanding; at which previously unquestioned assumptions, such as that the ranches in PRNS appropriately preserve history, can be tested; and at which already refuted claims, such as that the ranches in PRNS are good stewards of the land and ecologically important, can be retired as a matter of public record.

The hearings should not be dominated by parties that have shown themselves to be partisan, such as the National Park Service itself or the Marin County Board of Supervisors, or which have vested financial interests, such as the Point Reyes Seashore Ranchers Association and the Marin Agricultural Land Trust (MALT). Such criteria also disqualify Senator Feinstein and Representative Huffman, in whose district the park lies, both of whom, without any hint of irony or chagrin, boast that their positions on Point Reyes survived the publication of the EIS without significant modification, and both of whom accept significant campaign contributions from agricultural sources.

There is little time left. The General Management Plan must be finalized by July 14, 2021. It is not expected that the Park Service renders its final decision before hearing from the California Coastal Commission. The Coastal Commission has postponed its determination of compliance from its original target date of January 20, 2021 (yes, inauguration day) to April 22, 2021, (yes, earth day).



## Additional References:

[https://bohemian.com/park-service-pushes-back-on-apocalypse-cow/?fbclid=IwAR2cYX3U2E5BdGPFuAfuJGF2\\_wvQ8ZO1d4r1s-RqHB6dQ9zlpYChN7-FeCU](https://bohemian.com/park-service-pushes-back-on-apocalypse-cow/?fbclid=IwAR2cYX3U2E5BdGPFuAfuJGF2_wvQ8ZO1d4r1s-RqHB6dQ9zlpYChN7-FeCU)

<https://www.counterpunch.org/2021/02/22/apocalypse-cow-point-reyes-national-seashore-launches-a-propaganda-war-targeting-independent-journalism/>

[https://www.biologicaldiversity.org/news/press\\_releases/2015/tule-elk-04-16-2015.html](https://www.biologicaldiversity.org/news/press_releases/2015/tule-elk-04-16-2015.html)

<https://www.thewildlifeneews.com/2019/10/31/trumps-fix-is-in-on-point-reyes/>

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<sup>[1]</sup> <https://www.nps.gov/pore/learn/index.htm>

<sup>[2]</sup> Managing a land in motion: an administrative history of Point Reyes National Seashore; Paul Sadin. October 2007.

<sup>[3]</sup> [https://www.nps.gov/pore/learn/nature/tule\\_elk.htm](https://www.nps.gov/pore/learn/nature/tule_elk.htm)

<sup>[4]</sup> <https://www.nbcbayarea.com/news/local/250-native-elk-die-inside-fenced-area-at-point-reyes-national-seashore/70252/>

<sup>[5]</sup> <https://pacificsun.com/apocalypse-cow-the-future-of-life-at-point-reyes-national-park/>

<sup>[6]</sup> [https://bohemian.com/park-service-pushes-back-on-apocalypse-cow/?fbclid=IwAR2cYX3U2E5BdGPFuAfuJGF2\\_wvQ8ZO1d4r1s-RqHB6dQ9zlpYChN7-FeCU](https://bohemian.com/park-service-pushes-back-on-apocalypse-cow/?fbclid=IwAR2cYX3U2E5BdGPFuAfuJGF2_wvQ8ZO1d4r1s-RqHB6dQ9zlpYChN7-FeCU)

<sup>[7]</sup> <https://www.counterpunch.org/2021/02/22/apocalypse-cow-point-reyes-national-seashore-launches-a-propaganda-war-targeting-independent-journalism/>

<sup>[8]</sup> Personal communication.

<sup>[9]</sup> <https://www.marinij.com/author/kevin-lunny/>

<sup>[10]</sup> <https://www.rri.org/Lawsuit/Ranchers%20Association%20CRMP%20Scoping%20Comments.pdf>

<sup>[11]</sup> The 1916 Organic Act –

<https://www.nps.gov/foun/learn/management/upload/1916%20ACT%20TO%20ESTABLISH%20A%20NATIONAL%20PARK%20SE RVICE-5.pdf>

<sup>[12]</sup> 1976 Amendment: <https://www.govtrack.us/congress/bills/94/hr8002/text>

<sup>[13]</sup> <https://www.pressdemocrat.com/article/news/oyster-racks-pulled-in-cleanup-of-drakes-estero/>

<sup>[14]</sup> [https://www.nps.gov/pore/getinvolved/planning\\_gmp\\_amendment\\_deis\\_public\\_comments.htm](https://www.nps.gov/pore/getinvolved/planning_gmp_amendment_deis_public_comments.htm)

<sup>[15]</sup> <https://restoreptreyesseashore.org/comments-to-draft-plan/>

<sup>[16]</sup> <https://documents.coastal.ca.gov/reports/2021/1/Th6b/Th6b-1-2021-report.pdf>

<sup>[17]</sup> Facebook, September 12, 2019

<sup>[18]</sup> <https://www.ptreyeslight.com/article/lunny-visits-white-house>

<sup>[19]</sup> <https://www.pointreyesrewild.org/tule-elk>

<sup>[20]</sup> <https://www.ptreyeslight.com/article/meet-new-superintendent-point-reyes-seashore>

<sup>[21]</sup> <https://www.nationalgeographic.com/environment/article/biden-commits-to-30-by-2030-conservation-executive-orders>

<sup>[22]</sup> <https://pacificsun.com/breaking-news-fecal-bacteria-poisons-point-reyes-beaches/>

This email and any files transmitted with it are confidential, proprietary and intended solely for the individual or entity to whom they are addressed. If you have received this email in error please delete it immediately.



**From:** Robert Johnston

**Sent:** Friday, March 19, 2021 12:32 PM

**To:** John Weber ([john.weber@coastal.ca.gov](mailto:john.weber@coastal.ca.gov)) <[john.weber@coastal.ca.gov](mailto:john.weber@coastal.ca.gov)>; Larry Simon ([Larry.Simon@coastal.ca.gov](mailto:Larry.Simon@coastal.ca.gov)) <[Larry.Simon@coastal.ca.gov](mailto:Larry.Simon@coastal.ca.gov)>

**Cc:** [Craig\\_Kenkel@nps.gov](mailto:Craig_Kenkel@nps.gov); Ketcham, Brannon <[Brannon\\_Ketcham@nps.gov](mailto:Brannon_Ketcham@nps.gov)>

**Subject:** Comments on the Upcoming CD for PRNS GMP

John,

**Re. Consistency Determination, Pt. Reyes Nat'l Seashore Gen. Mgmt. Plan Amendment, April 2021 Meeting**

Please consider these comments before finalizing your Staff Report, if possible.

History of Water Pollution in the Park

The proposed Federal Agency Action is for the NPS to adopt Alternative B, which will continue dairy and beef ranches for at least 20 years. The serious levels of water pollution from these ranches have been documented for several decades now. The regional water board stated two years ago that exceedances still occur, meaning that past BMPs were not sufficient to bring the ranches into compliance with the standards for coliform bacteria. The board's letter by O'Hara also said that additional BMPs were likely to be impractical, technically or financially. The letter then said that the proposed plan will likely violate the State WQ non-degradation policy by increasing pollution due to small livestock being increased. In the EIS, the Park claims that stronger BMPs will solve this problem, but this is very doubtful as I will explain below. So, the water quality impacts of this Action are clearly inconsistent with the State Coastal Plan policies, unless the Action is accompanied by additional commitments to regulate grazing and pollutant discharges.

The water board's Dairy Waiver program did not apply to most of the dairies in the Seashore until June 10, 2020 when the Order was broadened to include all dairies in the board's 9-county region. The experience over more than a decade when the Order applied only to dairies in the Tomales Bay watershed showed that the BMPs there were not adequate, as the water samples taken during early winter storms continued to exceed the standards. This was true for some of the streams on the Eastshore and both streams in the Olema Valley (Lagunitas Cr. and Olema Cr.). Re. the latter, a report by Voeller for the NPS showed improvements in WQ after very basic BMPs were installed, but exceedances were still found for 62% of samples in Lagunitas and Olema creeks. The Tomales Bay experience clearly shows that conventional BMPs will not work well enough to meet water quality standards.

The recent water quality sampling done in the Park by a professional engineer (late January, 2021) for two environmental groups showed large exceedances of several coliform standards in creeks draining the dairy ranches in the Northern part of the Park (attached). This shows that the BMPs installed on the dairy ranches were inadequate. Some of those BMPs were expensive (building a new loafing barn farther from creeks) and the Park and USDA subsidized this effort. The water samples were also taken below several beef cattle ranches in the Drakes Estero drainage and these also violated coliform standards. So, the Park has not regulated the ranches adequately in the past and the BMPs that have been completed have not solved the problem. And it seems that the dairies cannot afford further BMPs.

Lastly, it is clear that the Park has not adequately regulated their ranch lessees in the past. Although the Dairy Waiver did not legally apply to the dairies in the Park, common sense and their controlling laws have always required the NPS to make their lessees not pollute our State waters, especially when children play in many of the streams. I took photos of two kids playing in lower Kehoe Cr. three weeks ago and told them to not get the water in their mouths. That creek has set statewide records for coliform concentrations 100X or 1000X the standard, year after year! The Park has not even had a range scientist on staff consistently, due to budget problems. The range condition report done by UC Berkeley a few years

ago showed violations of the minimum Fall vegetation requirements in many pastures, some for two years in a row, a sign of severe overgrazing. This history shows that the Park and the ranchers do not observe even the most basic concern for field conditions and water quality and that the Park does not control its budget in order to hire a range scientist.

Please Place Conditions on Your CD Approval, All to Be Adopted in the NPS ROD

1. Water Quality. Your previous Staff Report recommended to the Commission that it require the NPS to adopt a water quality monitoring program. That was recommended by a recent grazing study done by UC Berkeley for the Park and by NPS studies decades ago. Please make the Park commit to doing the coliform and other samples during or within several hours after the first Fall rainstorm, as this is necessary to catch the pulse of pollution coming off of the dairy cow and beef cattle concentration areas. Please add to that a requirement that the NPS commit in their ROD to implement that program. That is, fund the staff work and lab costs and put language in the leases that requires the NPS to terminate the lease for any ranch for which the runoff violates any water quality standards for three years in a row.

2. Grazing Oversight. Please also require the Park to regulate the grazing practices of their ranchers. This is elementary, but has not been done in the past. The Park must review the range condition each Fall for each field and change the cattle stocking rates for each field and ranch for the next calendar year. This is typical practice in ranching. The NPS leases must enable the Park to perform these actions. And the leases must state that any rancher violating the Residual Dry Matter standard for two years in a row will have their lease terminated. Ranchers have good control over cattle densities, so rapid enforcement here is fair.

3. Transparency. Please require the Park to post on their web site all relevant documents, so the public can determine if they are following their adopted policies. This would include all leases, all rancher reports on lease compliance, all

annual water quality reports from each ranch to the water board, all correspondence between ranchers and Park staff, all BMP workplans and contracts, and any other relevant paperwork.

This Park has a poor track record on monitoring water quality, supervising the ranches, and giving weight to public sentiment. These detailed conditions are all necessary for the Park to come into conformance with our beautiful California Coastal Act.

Thanks for considering this request.

Bob

<< File: Pt Reyes Surface Water Monitoring Conducted 27-28 Jan 2021, complete report dated 3 Mar 2021 (ultra low resolution images).pdf >>

Robert A. Johnston

415 663-8305 landline

530 559-0032 cell/text

P.O. Box 579, Point Reyes

Station, CA 94956

#7018

Name: O'Hara, Janet

Correspondence: September 20, 2019 Brannon Ketcham Point Reyes National Seashore 1 Bear Valley Road Point Reyes Station, CA 94956 Email: brannon\_ketcham@nps.gov

Subject: Comments on Environmental Impact Statement for a General Management Plan Amendment, Point Reyes National Seashore and North District of Golden Gate National Recreation Area, Marin County

Dear Mr. Ketcham: San Francisco Regional Water Quality Control Board (Water Board) staff appreciates the opportunity to comment on the Draft Environmental Impact Statement (draft EIS) for a General Management Plan (GMP) Amendment, Point Reyes National Seashore (PRNS) and North District of Golden Gate National Recreation Area (planning area). The EIS for the GMP Amendment will establish guidance for all lands currently under agricultural lease or permit within the planning area, relating to preservation of natural and cultural resources and management of infrastructure and visitor use. Based on the information provided in the draft EIS, we offer the comments below. These comments are to advise NPS of our concerns, so they may be incorporated into the planning and regulatory compliance process at an early date. We have focused our comments on the preferred alternative identified in the draft EIS, Alternative B.

We strongly support continued grazing and dairy operations on PRNS lands as identified in Alternative B and the development of longer leases up to 20 years. These longer leases should provide ranches and dairies with the ability to build needed improvements and infrastructure. We will continue to work closely with NPS and ranches/dairies through our permitting and 319(H) grants program to upgrade facilities and eliminate existing water quality impacts. In our work on PRNS lands, we have found that rangeland and dairy infrastructure and operation improvements can lead to significant water quality and habitat improvements.

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. The most significant of these impacts may occur in the Ranch Core Subzone.

Through our confined animal facility (CAF), grazing, and grants programs, we have worked closely with NPS to improve rangeland and dairy operations and management. All the actions identified as "high priority" in the NPS rangeland assessment have been implemented. As demonstrated through ongoing water quality monitoring (draft EIS pages 68-69), these efforts have resulted in significant water quality improvements. However, additional improvements are needed because water quality standards exceedances still occur. With NPS, we will evaluate recent data to determine what additional actions are needed to resolve existing water quality standard exceedances. 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.

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).

The draft EIS identifies Alternative B as the preferred alternative. In this alternative, the ranchland zone is divided into Subzones: Resource Protection Zone, Range Subzone, Pasture Subzone, and Ranch Core

Subzone. Our comments below focus on Alternative B and activities in the latter two Subzones because this is where most impacts would be expected to occur.

#### Alternative B comments

##### Resource Protection, Range and Pasture Subzones - Vegetation, Erosion and Water

We support the delineation of Subzones as described in Appendix H. The increase of 1200 acres in the Resource Protection Subzone will provide for significant water quality and habitat improvement.

The Pasture Subzone is identified "as lands where no sensitive resources are known to occur". In this area diversification will allow pasture use by sheep, goats and chicken. If properly managed, this diversification should have only minor and limited impacts. However, the draft EIS discussion does not clarify how these livestock and chickens will be managed. What mechanism or BMP prevents the sheep and goats, placed into the Pasture Subzone, from foraging in adjacent areas that are zoned differently and where sensitive resources do exist? Further, will the existing water infrastructure be adequate to effectively rotate the sheep and goats between fields to prevent overgrazing? It is unclear if the measure preventing sheep and goats from moving between Subzones is steep slopes (> 20%) and if so, if this effective. The draft EIS should fully identify the potential impacts to sensitive resources, water quality, and soil in the Resource Protection, Range and Pasture Subzones resulting from diversification in the Pasture Subzone, and how these Subzones will be managed to prevent impacts from goats, sheep and chicken.

##### Alternative B - Diversification - Water Resources

In our comments on the Notice of Intent (Nov. 30, 2018) we noted that the list of Impact Topics should be expanded to include watershed scale processes such as geomorphic and hydrologic processes. Geomorphic processes should include sediment generation and transport processes, as well as stream and floodplain geomorphic functions. Hydrology should include impacts to stormwater runoff characteristics (e.g., runoff volume and timing, percolation, Horton overland flow due to soil compaction); stream flow (e.g., volume, peak flow magnitude and timing, seasonal persistence) and groundwater recharge and discharge. These impacts may be significant in the Ranch Core Subzone (see below) but were not identified and evaluated.

##### Diversification in Ranch Core Subzone

The Ranch Core Subzone comprises a small lease/permit area (< 1% of total). However, the Ranch Core Subzone's potential to increase pollutant loading to streams, groundwater, wetlands, and degrade water quality and sensitive habitat greatly exceeds its relative size and may be very significant. These areas are the most likely of the newly proposed Subzones in the GMP to cause significant water quality and stream habitat degradation under the proposed diversification practices for the following reasons:

1. Location of Ranch Core Subzones: due to historic practice of siting dairy complexes and ranch facilities adjacent to creeks and on flat areas, several core areas are in low-lying areas at the base of a sub-watershed in alluvial fans or historic (now drained) wetlands. These areas are subject to frequent flooding, high volumes of converging stormwater flow from upslope hillsides, and creek planform instability (alluvial fan). Other ranch core areas, situated closer to the ridgetops, may discharge pollutants directly to headwater swales and small tributaries or be susceptible to more extreme weather than low-lying areas.

2. Impact of existing degradation in Ranch Core Subzone: Due to existing degradation of habitat and vegetation, these areas have little pollutant buffering and pollutant assimilative capacity. The proposed diversification activities will generate a higher pollutant loading and direct discharge to adjacent waterbodies in these areas due to a lack of existing vegetative buffers (filter strips, soil vegetative cover, and complex riparian zones. For instance, in many areas an increase in diversified livestock use will generate additional erosion due to presence of bare earth and there will be less pollutant filtration due to the lack of a complex riparian zone.

3. Diversification activities in Ranch Core Subzone: the actual proposed diversification activities have the potential to generate significant pollutant discharges due to the nature of the activities (see below - diversification activity impacts).

4. Technical or financial infeasibility of implementing appropriate BMPs, management or mitigation measures to eliminate or reduce impacts: In some Ranch Core locations, the suggested mitigation measures, such as "comply with requirements in the General CAF permit" may not be adequate. For example, the requirement to eliminate stormwater run-on into areas containing waste products, may be technically or financially infeasible. In the locations where the measures cannot successfully be implemented, there will be significantly greater impacts than identified in the EIS. Further, the actual impacts of installing the necessary measures, for many of the diversification activities have not been fully considered. Examples include: • Rerouting stormwater or altering the drainage patterns in row crop fields which may alter groundwater recharge and affect stream hydrology (low and high flow) • Disposing of manure and urine-soaked bedding in horse boarding facilities, or high nitrogen chicken manure through composting. See also Attachment A of CAF Order No. R2-2016-0031 (General CAF WDR).

#### Impacts from Specific Diversification Activities in Ranch Core Subzone

1. Waste generation: The proposed diversification activities related to increased livestock diversity (pigs, sheep, goats, chickens, horses), horse boarding, and small-scale processing of dairy products may generate wastes that include manure, process wastewater, animal wash water, and any water, precipitation, or rainfall runoff that contacts animal confinement areas and/or raw materials, products, or byproducts such as manure, compost piles, feed, bedding materials, silage, eggs, or milk. Waste from such facilities can contain pathogens, oxygen-depleting organic matter, sediment, nitrogen compounds, compounds toxic to fish and other aquatic organisms, and other suspended and dissolved solids that can impact both groundwater and surface water if not properly managed. Daily operations can cause degradation of water quality as a result of waste discharges and activities that result in soil erosion and destruction of riparian habitat.

Adverse aquatic habitat impacts associated with improper waste management and application may include: nutrient enrichment resulting in algal blooms, organic waste loading resulting in lowered oxygen levels, siltation of gravel areas that can eliminate fish habitat, high levels of ammonia that are toxic to fish and aquatic invertebrates, and elevated levels of nitrates and other salts in groundwater. Additionally, animals whose movement is not controlled through fencing or other methods may further degrade riparian zone, wetland, or other sensitive habitat and lead to further loss of the function of those habitats, including pollutant filtration, shade and stream temperature control, and streambank and soil stability. The draft EIS does not clearly indicate if the diversified livestock will be corralled/fenced or free range, nor does it identify potential impacts of free range livestock, such as loss

of riparian zone and wetlands. If livestock are confined(1), the requirements of the General CAF WDR must be met. Even so, the EIS still should fully identify and evaluate potential impacts associated with CAF operations. As discussed above, the technical/financial feasibility of many of the proposed management and mitigation measures requires evaluation. Where such measures are not feasible, there will be impacts the draft EIS does not currently identify, and the impacts of those identified will be more significant.

2. Row crops: Row crops have the potential to increase soil erosion and discharge of sediment to streams; increase nutrient runoff from manure or compost application; increase the need for invasive plant control, as conditions for invasive plant germination and dissemination are improved (see integrated pest management discussion below); increase soil compaction; alter stormwater flow paths and increase runoff leading to a decrease in groundwater recharge and altered stream hydrology (low and high flow). Some mitigative measures proposed in the draft EIS may provide only limited erosion control depending on the site characteristics. For example, mulching and seeding have variable success at erosion control depending on factors such as slope, wind, soil moisture and temperature. The draft EIS does not fully discuss harvest methods, whose impacts can be significant depending on machinery used. Additional clarity is needed in the description of allowable row crop activities and identifying their impacts.

3. Integrated Pest Management (IPM) for invasive weed control: As stated in the draft EIS, "Vegetation management practices for invasive plants in crop areas would be subject to mitigation measures to minimize or prevent adverse impacts associated with these practices....using herbicides and biocides on cultivated or rangeland areas for purposes of weed management would continue to comply with NPS IPM regulations and procedures. Compliance with these regulations and procedures and applicable handling and disposal laws and the use of appropriate herbicide application methods (e.g., restrictions on spraying during windy or wet days) would minimize or prevent adverse impacts on surface water and groundwater quality." (pg. 115). This discussion does not fully identify the impacts of herbicides on groundwater and aquatic habitats that support salmonids and other species known to be sensitive to herbicides.

4. Public use and enjoyment: the proposed increase in farm tours and overnight use facilities would increase sewage production and water use. The draft EIS does not fully identify or evaluate potential impacts associated with increased sewage generation and appropriate management measures.

5. Water use: the draft EIS does not adequately identify all the increased water demands associated with the proposed diversification, row crop, and public use and enjoyment. The draft EIS identifies the volume of daily drinking water consumption by goats, chicken, and horses, and this increased use is relatively minor. However, numerous water demands are not considered including: pig and sheep daily drinking consumption; wash water needed for horse boarding facilities including horse and stall washing; wash water for management of CAF facilities; water use for public use and enjoyment including overnight facilities (cooking, showers, restrooms, etc.); flower/vegetable gardens associated with landscaping for overnight facilities; crop produce and equipment wash water; cheese making or other commercial process manufacturing water.

This increased water demand could be met through use of existing permitted stored reservoir/pond water, redevelopment of existing wells and springs, or new wells and new surface water diversions. In our work with NPS on existing rangelands, we have supported the redevelopment of existing wells to



provide alternate water supply for cattle fenced out of creeks. In such cases, the overall water use is unchanged, and riparian zone and water quality benefits accrue from fencing cows out of creeks. However, we do not support allowing activities that significantly increase water demand, because it may further reduce stream flow, wetlands and groundwater recharge. Research in the Olema Creek watershed by the University of California-Berkeley has found reduced Coho growth and mortality in Olema tributaries due to low flow conditions. Further, increased demand on ponds/reservoirs could result in lowering of reservoir water levels, reduce their capacity to meet demands during droughts, and decrease pond wetland and amphibian habitat. The draft EIS states that no new wells will be developed. However, the EIS does not identify potential impacts resulting from the development of new water supply reservoirs/ponds or diversions that may be allowed through a state water rights process.

#### Closing

In conclusion, we strongly support the issuance of longer leases and diversification into the Pasture Range Subzone. Additional clarity is necessary regarding control of livestock movement between Subzones. However, due to the sensitive location of the Ranch Core Subzone, high level of existing degradation, significant pollutant generation by diversification activities, and potential for technical/financial infeasibility of installing mitigation/manage measures, we find the EIS does not fully identify the impacts of Ranch Core Subzone diversification.

Sincerely Janet O'Hara Senior Environmental Scientist Planning and TMDL Division

Copy: State Clearinghouse, [State.Clearinghouse@opr.ca.gov](mailto:State.Clearinghouse@opr.ca.gov)

(1) California Code of Regulations, Title 27 section 20164, defines a CAF as "... any place where cattle, calves, sheep, swine, horses, mules, goats, fowl, or other domestic animals are corralled, penned, tethered, or otherwise enclosed or held and where feeding is by means other than grazing."

**From:** Cynthia Brown <cynthia.brown@mygait.com>

**Sent:** Friday, March 5, 2021 12:47 PM

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

**Subject:** Thule ELK

SAVE THIS WILDLIFE. they are part of our history and need to perserved. The ranchers are rich enough to allow these animals to have food and water they were here first.l

undefined.

**From:** hkfauss@gmail.com <hkfauss@gmail.com>

**Sent:** Monday, March 1, 2021 10:03 AM

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

**Subject:** Point Reyes Seashore

Industrial dairy ranches with over 5,000 cows are causing harm to the ocean surrounding the Pt. Reyes National Park. We value the lives of the Elephant Seals, fish and other animals who live in the waters affected by manure runoff from the ranches. Cordell Banks adjacent to the Park is a rich source of life to many, including birds coming all the way from the Hawaiian Islands. The dense, rich plant and animal life seen in the Park where there are no cows is in stark contrast with land stripped of vegetation and wildlife which should be in a national park and preceded the dairies. Cows are not part of the natural environment we expect in a national park!

We all know of the harm to the environment from greenhouse gases, yet dairies, which contribute in a major way to the destruction of the environment, continue to be subsidized by the National Park Service. Pt Reyes land and ocean are suffering continued destruction from dairy ranching. Please take actions which will restore health to this precious resource.

Sincerely,

Helen Fauss

120 Scenic Rd

Fairfax, CA

94930

**From:** Beatrice Waterhouse <waterbeatrice@gmail.com>

**Sent:** Wednesday, February 03, 2021 1:05 PM

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

**Subject:** Protecting Point Reyes wildlife

To whom it may concern:

I write in support of saving the Tule Elk of Point Reyes National Seashore from slaughter at the hands of ranchers and rangers. I have read the Point Reyes National Seashore General Land Management Plan and noted that it grants 20-year leases to ranching operations and gives the park a license to kill the wild Tule Elk that could interfere with the ranch businesses. It is ridiculous to kill native wildlife on its own territory.

I strongly urge you to amend the Plan immediately to provide protection to the Tule Elk and all other native wildlife of Point Reyes.

Sincerely

Beatrice Waterhouse

**From:** Thomas Bachand <[tom@thomasbachand.com](mailto:tom@thomasbachand.com)>

**Sent:** Friday, January 15, 2021 4:07 PM

**To:** Energy@Coastal <[EORFC@coastal.ca.gov](mailto:EORFC@coastal.ca.gov)>

**Subject:** Public Comment on January 2021 Agenda Item Thursday 6b - CD-0006-20 (National Park Service, Marin County)

RE CD-0006-20.National Park Service General Management Plan for Point Reyes National Seashore

Dear CCC,

I have been hiking the Point Reyes National Seashore for fifty years –on nearly a weekly basis in the last few decades. It is deeply unsettling that the National Park Service General Management Plan for Point Reyes National Seashore seeks to further the interest of ranchers, when public sentiment is overwhelming against the idea.

Coastal Commission staff recognize this fundamental disconnect between the public sentiment and Park promotion of private business on park land, but seems unwilling to take any action. In their Staff Report on the GMP, staff give every benefit of the doubt to the NPS, and yet yield nothing to the public or nature, whether it be restoring coastal access, preserving and promoting marine resources, promoting native plant species, or protecting the wild elk. Instead, the report proposes that NPS add more details to their plan and leave it at that.

Surrounded as it is by Marin County's vast cattle grazing lands, protecting ranching at PRNS unwarranted. Rationalizing that these ranches are historic is specious, at best. The ranches are only 150 years old, represent a colonial settlement mentality, hinder public access, and are destroying native flora, fauna, and ecosystems that are becoming increasingly rare along California's coast. The truth is, we don't what the total benefits would be if nature were allowed to fully reclaim Point Reyes. Point Reyes is a rare and national treasure. It should be allowed the chance to flourish in all its glory. Perhaps we'll learn a thing or two. The ranches have had over 50 years to vacate. It's time.

If the California Coastal Commission can't step up and join overwhelming public support to protect park lands, than it needs to reevaluate what's it is doing.

Thomas Bachand  
Oakland, California

From: KENDRICK MILLER <kwmiller@pacbell.net>  
Sent: Friday, January 29, 2021 8:03 PM  
To: Coastal Point Reyes Management Plan <PointReyesManagementPlan@coastal.ca.gov>  
Cc: gavin@gavinnewsom.com; Craig\_Kenkel@nps.gov; jared.huffmann@mail.house.gov;  
diannefeinstein@senate.gov  
Subject: Re: NPS GMPA Consistency Determination

Commissioners,

It is the cows that should be exterminated, not the elk.  
Sincerely,

KENDRICK MILLER

cc: Governor Gavin Newsom

cc: Superintendent Craig Kenkel

cc: Representative Jared Huffmann

cc: Senator Dianne Feinstein

From: cbjs@everyactioncustom.com <cbjs@everyactioncustom.com>  
Sent: Friday, January 29, 2021 6:27 PM  
To: Coastal Point Reyes Management Plan <PointReyesManagementPlan@coastal.ca.gov>  
Subject: Reject the Conditional Compliance to Point Reyes GLMPA

Dear Executive Director John Ainsworth,

Animals are not things!!! They are sentient beings who have as much right to live as we do!! We must stop murdering innocent animals!!! As someone who is concerned about wild animals and wildlands, and one of over 250,000 In Defense of Animals supporters, I urge you to vote against the staff-recommended conditional compliance to the Point Reyes General Land Management Plan Amendment (GLMPA), and object to the National Park Service's consistency determination, which is not consistent with the California Coastal Management Plan.

The CCC received over 20,000 comments opposing the park's plan to continue ranching leases within the national park. We applaud the Commission for postponing the public hearing, which will allow enough time to adequately review and analyze comments with scientific and technical data.

The staff report focused on water quality, yet the last tests were documented in 2013. In Defense of Animals recently performed professional scientific water quality tests from key collection points at Point Reyes National Seashore. Now the Commission has ample opportunity to review these new findings.

The report also did not address other spillover effects from the Point Reyes GLMPA, including air quality and climate impacts from grazing cows, water quantity, and the loss of coastal public access.

Please vote against the conditional compliance to protect our waterways and the Pacific Ocean from harmful spillover impacts. Thank you for your consideration of this important and timely matter.

Sincerely,  
Cathy Burgers

Sincerely,  
Mrs Cathy Burgers  
[cbjs@rogers.com](mailto:cbjs@rogers.com)

From: Marcie Long <Obi@jps.net>  
Sent: Friday, January 29, 2021 3:24 PM  
To: Coastal Point Reyes Management Plan <PointReyesManagementPlan@coastal.ca.gov>  
Cc: gavin@gavinnewsom.com; Craig\_Kenkel@nps.gov; jared.huffmann@mail.house.gov;  
diannefeinstein@senate.gov  
Subject: Re: Pt Reyes rule elk

Re: General Management Plan Amendment/Final Environmental Impact Statement (GMPA/EIS) for Point Reyes National Seashore and the north district of Golden Gate National Recreation Area not consistent with the California Coastal Management Program.

This plan is not consistent with park and recreation area usage. Johnson's oyster farm was evicted from GGNRA, but you want to expand area for dairy!?! At the expense of the tule elk! People who use these lands want a natural experience not a working dairy experience. (Which you can hardly avoid in the far west area.)

I've hiked and picnicked at GGNRA since 1970. What you are proposing is preposterous. Do the right thing for the elk, the salmon, and our heritage.

The expanded and new agricultural uses and intensity would heighten the already troubling impacts to water quality in nearby streams, further threatening endangered salmonids in the area.

This plan would treat native tule elk as problem animals to be killed or hazed, while authorizing additional and expanded agriculture uses which are certain to cause further conflicts between ranching operations and native wildlife. Native tule elk were brought back from the brink of extinction and Point Reyes National Seashore is the only national park where tule elk are found. The public, including myself, would be devastated at the thought of intentionally killing these majestic creatures. This in no way conforms with your mandate of protecting our recreational opportunities and public enjoyment of the coastal zone.

For all these reasons, I urge you to find the GMPA/EIS not consistent with the California Coastal Management Program. Thank you for your consideration.

Sincerely,

Marcie Long

cc: Governor Gavin Newsom

cc: Superintendent Craig Kenkel

cc: Representative Jared Huffmann

cc: Senator Dianne Feinstein



**From:** Robyn Reichert <robyn.reichert@palmbeachschools.org>

**Sent:** Wednesday, January 27, 2021 11:23 AM

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

**Subject:** STOP!

PLEASE stop the forced killing of elk in your park, this is extremely cruel! They deserve to live!

R Reichert

--

*Miss Reichert M.Ed*

*VE/Inclusion Teacher (K-5)*

*Hope Centennial Elementary*

*Room 311*

*It does not matter how slowly you go, as long as you do not stop!- Confucius*

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**From:** Albert Straus <[albert@strausmilk.com](mailto:albert@strausmilk.com)>

**Sent:** Thursday, January 21, 2021 12:21 PM

**To:** Turnbull-Sanders, Effie@Coastal <[effie.turnbull-sanders@coastal.ca.gov](mailto:effie.turnbull-sanders@coastal.ca.gov)>; Aminzadeh, Sara@Coastal <[sara.aminzadeh@coastal.ca.gov](mailto:sara.aminzadeh@coastal.ca.gov)>; Hart, Caryl@Coastal <[caryl.hart@coastal.ca.gov](mailto:caryl.hart@coastal.ca.gov)>; Wilson, Mike@Coastal <[mike.wilson@coastal.ca.gov](mailto:mike.wilson@coastal.ca.gov)>; Rice, Katie@Coastal <[katie.rice@coastal.ca.gov](mailto:katie.rice@coastal.ca.gov)>; Escalante, Linda@Coastal <[linda.escalante@coastal.ca.gov](mailto:linda.escalante@coastal.ca.gov)>; Howell, Erik@Coastal <[erik.howell@coastal.ca.gov](mailto:erik.howell@coastal.ca.gov)>; Uranga, Roberto@Coastal <[roberto.uranga@coastal.ca.gov](mailto:roberto.uranga@coastal.ca.gov)>; Groom, Carole@Coastal <[carole.groom@coastal.ca.gov](mailto:carole.groom@coastal.ca.gov)>

**Cc:** [Melanie Gunn@nps.gov](mailto:Melanie_Gunn@nps.gov); Ainsworth, John@Coastal <[John.Ainsworth@coastal.ca.gov](mailto:John.Ainsworth@coastal.ca.gov)>; Beekman, Christine M <[christine\\_beekman@nps.gov](mailto:christine_beekman@nps.gov)>; Ketcham, Brannon <[Brannon\\_Ketcham@nps.gov](mailto:Brannon_Ketcham@nps.gov)>

**Subject:** PRNS General Management Plan compliance with Coastal Act

Hello Commissioners,

I appreciate the CC Staff's recommendation to approve the GMP for PRNS. The only point of difference is that the California Regional Water Quality Control Board regulates water quality from all the ranches in Point Reyes National Seashore and there is no need to develop more water quality plans by PRNS.

- I support the National Park's service 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 Act, which supports and enhances local agriculture and a sustainable organic farming and food system.
- There is no need for a water quality assessment plan in the Park because it already exists through California law and is licensed and regulated by the California Regional Water Quality Control Board San Francisco Bay Region.
- Below is a link to the Dairy Order in the SF Bay waterboard region:  
[https://www.waterboards.ca.gov/sanfranciscobay/water\\_issues/programs/agriculture/CAF/CAF%20General%20WDRs%20Order%20R2-2016-0031%20\(Complete%20with%20attachments\).pdf](https://www.waterboards.ca.gov/sanfranciscobay/water_issues/programs/agriculture/CAF/CAF%20General%20WDRs%20Order%20R2-2016-0031%20(Complete%20with%20attachments).pdf)

The monitoring and reporting program, which addresses monitoring of surface water is linked here, below. The specific requirements laid out for surface sampling are found on page 6 & 7:

- [https://www.waterboards.ca.gov/sanfranciscobay/water\\_issues/programs/agriculture/CAF/WDR%20Attachment%20A%20MRP.pdf](https://www.waterboards.ca.gov/sanfranciscobay/water_issues/programs/agriculture/CAF/WDR%20Attachment%20A%20MRP.pdf)

Many thanks,  
Albert



**Albert Straus**

Founder & CEO

1105 Industrial Ave., Ste. 200

Petaluma, CA 94952

707.776.2887 x 2102

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**From:** Mark Nienberg <mark.nienberg@gmail.com>

**Sent:** Tuesday, January 19, 2021 1:28 PM

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

**Subject:** Pt Reyes Management Plan

I urge you to deny the Consistency Determination for the NPS General Management Plan Amendment for Point Reyes National Seashore. The Park Service failed to consider public opinion and comments to the plan, and approving it would miss a historic opportunity to enhance our coastal zone.

Many of the leases for cattle operations are currently held by grandchildren of the original owners, who were compensated for their properties fifty years ago. There is no reason to continue this inappropriate land use inside our national park. Imagine if the park were managed for wildlife, water quality, and recreation, rather than beef and dairy. The potential is enormous.

Nobody visits Point Reyes National Seashore to see cattle. They come for the elephant seals, the Tule elk, the raptors, the common murre, and so on. There are plenty of opportunities to see cattle ranching in the rest of Marin County, just across Tomales Bay from Point Reyes.

If you reject the Management Plan Amendment, perhaps the new federal administration will design a more rational plan that puts the interests of our environment, citizens, and visitors above those of private profit.

Sincerely,

Mark Nienberg

297 Berkeley Park Blvd

Kensington, CA 94707

**From:** Elijah Summers <eli.gips@gmail.com>

**Sent:** Thursday, January 14, 2021 6:37 PM

**To:** Linda\_Walker@nps.gov

**Cc:** Coastal Point Reyes Management Plan <PointReyesManagementPlan@coastal.ca.gov>;

Carey\_feierabend@nps.gov; Craig\_Kenkel@nps.gov

**Subject:** Please Preserve Point Reyes for me, my Father, and my father's grandchildren

Dear Linda and National Park Service,

I am writing to tell you how important I think it is that Point Reyes be preserved as it is, for the benefit of Marin County residents, the local wildlife and the environment at large. I am also writing to ask that you not sign any plan that prioritizes ranching over access to public land and native wildlife, especially before the California Coastal Commission has time to weigh in.

I was born in Marin in 1994 and visited Point Reyes frequently as a child with my parents. When they divorced, I moved with my mother to the East Bay, but when I visited my dad in Marin we would often drive out to the Point to appreciate the quiet beauty of the cliffs over the ocean, walk in the mist, and watch the Tule Elk during their mating season. As an adult, I still find that visiting the point gives me a sense of peace that few places can. On the drive there, we always see the dairy farms, and their rolling hills have a beauty of their own, but the transition into the Elk territory holds a special kind of serenity. I know that many other Marin residents feel the same way, that the point offers a refuge for them. A close friend of mine from high school once told me that visiting the point was something he found grounding in his struggle with underage addiction. I am glad to say that he is now sober, and I believe that the preservation of places like Point Reyes offers a tremendous source of comfort for our neighbors who struggle to find their place in the world.

The Tule Elk's mating season is always a very special time. As a child, seeing those large animals in the wild, butting each other as they have for millions of years, instilled in me a sense of awe at the power and majesty of evolution. Having such a concrete way to see their mating process helped me to understand the incredible gift of life that we have all received. In high school I was lucky enough to visit Yellowstone National Park one summer and see awe-inspiring Moose there in the wild. However, to be honest with you, seeing the Tule Elk as a child has had a greater impact on me, understanding the strong rhythms of the seasons here year after year, knowing how their lives and mine are intertwined.

I am sure that you know all about how the Tule Elk are a flagship species, that their presence has captured the hearts and minds of thousands of Californians like myself. It's not just the Elk who are important though, they have co-evolved with our native grasses and shrubs to create the unique environment of the Point. Point Reyes is an exceptional gem of Marin, so far preserved by incredible work of conservationists and by the natural geography of Marin. Its isolation allows it to be a haven

from the lightning speed of development in California. I believe that this pocket of California as it once was is an incredible asset to us all, both for environmental and educational reasons.

Point Reyes is the furthest south of our coastal Elk environments and as temperatures continue to rise globally, it and places like it will become increasingly scarce the further south we look. Keeping the Point as it is will help to trap carbon in the earth and slow global warming in a way that dairy farms never can, because of the faster turnover of agricultural grazing. Keeping Point Reyes as it is makes a statement that our native grass and scrublands are important, our Tule Elk are important, and we as Californians are important. It would be a tragedy to lose Point Reyes as it is now. I sincerely hope that when I have children, I too can bring them to Point Reyes to witness the miracle of the Elk's life cycle. My stepsister, my father's stepdaughter, has two small children now and I know my dad is looking forward to bringing his grandchildren to the Point when they are bigger. From the bottom of my heart, I beg you to allow us these hopes for the future and preserve Point Reyes as it is now, a priceless treasure of Marin. I have attached a picture of an Elk that my dad took, I know that you know what they look like but I am hoping to show you that each of this photo and the hundreds more that my father has taken represent a special day for my family.

Please do not sign the current General Management Plan Amendment for Point Reyes National Seashore, or any plan that destroys habitat and native species in favor of ranching or farming. Protect people's access to public land and the ecosystem of Point Reyes. Please do not sign this Record of Decision.

Hoping for health for you and your families in this difficult time,

Elijah





**From:** Tim Vago <[tim.vago@yahoo.com](mailto:tim.vago@yahoo.com)>

**Sent:** Tuesday, January 5, 2021 7:01 PM

**To:** Energy@Coastal <[EORFC@coastal.ca.gov](mailto:EORFC@coastal.ca.gov)>

**Subject:** Public Comment on January 2021 Agenda Item Thursday 6b - CD-0006-20 (National Park Service, Marin County)

Dear California Coastal Commission:

We are submitting our objection to the National Park Service's plan to cull Tule Elk in the Point Reyes National Seashore. What if bison in Yellowstone National Park were culled so that dairy and beef cattle would have sufficient grazing lands in that National Park? It would be an outrage, and this situation is similarly outrageous for our indigenous Tule Elk.

Furthermore, we want to point out that the Commission should not be forced to make a decision by January 20 when the Commission requested an extension to March 2021. It is no coincidence that the January 20 deadline corresponds with the departing Trump Administration which prioritizes the interests of its donor constituency above those of the State of California. The National Park Service under the new Biden Administration may have a different plan for the Point Reyes National Seashore more in line with the overall interests of the State of California rather than a small group that will reap the economic benefit of the current NPS recommendation. At a minimum, the California Coastal Commission should postpone taking action on this matter until the March 2021 meeting at the earliest. California does not have an obligation to make a rushed decision for the outgoing Trump Administration and should take the proper time for consideration of the best course of action for State of California in this matter.

Thanks and regards,

Timothy Vago

Jill Alexander

1255 Trumpeter Place

San Jose, CA 95131

**From:** janetlocke@gmail.com <janetlocke@gmail.com>

**Sent:** Wednesday, January 13, 2021 6:49 PM

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

**Cc:** Weber, John@Coastal <john.weber@coastal.ca.gov>; Craig\_Kenkel@nps.gov

**Subject:** RE: Reject the GLMA

Dear California Coastal Commission,

Please vote against the Point Reyes General Land Management Plan Amendment (GLMPA). Just as we want our California coasts preserved for the recreational use of future generations, we want the Elk at Pt. Reyes to be preserved for future generations. In fact, I enjoy seeing them now. The park belongs to the people, and so do the elk. Please do not cull them!

At the very least, take the time before making a final decision to further evaluate the likely effects of allowing ranching interests to rob the elk of their resources and ruining Pt. Reyes National Seashore.

Very sincerely yours,

Janet Locke

10 W Brooke Drive  
Novato CA 94947



**From:** "[mailer-daemon@yahoo.com](mailto:mailer-daemon@yahoo.com)" <[mailer-daemon@yahoo.com](mailto:mailer-daemon@yahoo.com)>

**To:** "[tdjorg@pacbell.net](mailto:tdjorg@pacbell.net)" <[tdjorg@pacbell.net](mailto:tdjorg@pacbell.net)>

**Sent:** Wednesday, January 13, 2021, 04:02:24 PM PST

**Subject:** Failure Notice

Sorry, we were unable to deliver your message to the following address.

<[pointreyesmanagement-plan@coastal.ca.gov](mailto:pointreyesmanagement-plan@coastal.ca.gov)>:

550: 5.4.1 Recipient address rejected: Access denied. AS(201806281) [BL0GCC02FT013.eop-gcc02.prod.protection.outlook.com]

--- Below this line is a copy of the message.

I am writing in opposition to the the Point Reyes National Seashore General Land Management Plan - Alternative "B" which favors commercial beef and dairy operations within the National Seashore. I am strongly opposed to the continuation of ranching in a National Park ***as are over 90% of comments that have already been submitted.*** To sacrifice Tule Elk who belong in this area for the benefit of the livestock industry is to go against the purpose of protecting our wild animals and the purpose of National Parks. Capping the population of Elk at 120 by shooting these animals is unconscionable.

Thank you for considering the opinion of those of us who live in this area, and want to see Pt. Reyes returned to the wild.

Diana Jorgensen

From: Lynn Anderson <l8y0n6n@yahoo.com>

Sent: Tuesday, January 12, 2021 8:37 AM

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

Subject: Protect the Point Reyes elk

It is outrageous that you are destroying the Park, which should be for the people who pay for it - the public.

It is outrageous that you are going out of your way to kill innocent animals, for no reason except cruelty, to pander to those profiteering off of cruelty to other animals.

How many layers of wrong-doing are you willing to commit ?

You owe it to the public, (and to morality) to take down the fence and allow elk a place to exist, and to end the immoral leases.

Sincerely,  
Lynn Anderson

Sent from my iPad

**From:** OceanoDunesReview@Coastal <[OceanoDunesReview@coastal.ca.gov](mailto:OceanoDunesReview@coastal.ca.gov)>  
**Sent:** Sunday, January 10, 2021 4:03 PM  
**To:** NorthCentralCoast@Coastal <[NorthCentralCoast@coastal.ca.gov](mailto:NorthCentralCoast@coastal.ca.gov)>  
**Subject:** Fw: Point Reyes, Elk, and Plan B - Urgent action needed!

---

**From:** Ainsworth, John@Coastal <[John.Ainsworth@coastal.ca.gov](mailto:John.Ainsworth@coastal.ca.gov)>  
**Sent:** Tuesday, September 29, 2020 3:52 PM  
**To:** Kahn, Kevin@Coastal <[Kevin.Kahn@coastal.ca.gov](mailto:Kevin.Kahn@coastal.ca.gov)>  
**Subject:** FW: Point Reyes, Elk, and Plan B - Urgent action needed!

-----Original Message-----

From: Daniel C. Eckhard <[teledan@comcast.net](mailto:teledan@comcast.net)>  
Sent: Monday, September 28, 2020 9:49 PM  
To: Ainsworth, John@Coastal <[John.Ainsworth@coastal.ca.gov](mailto:John.Ainsworth@coastal.ca.gov)>  
Cc: [gavin@gavinnewsom.com](mailto:gavin@gavinnewsom.com); [PORE\\_Info@nps.gov](mailto:PORE_Info@nps.gov); [careyfeierabend@nps.gov](mailto:careyfeierabend@nps.gov);  
[Woody\\_Smeck@nps.gov](mailto:Woody_Smeck@nps.gov); [Dave\\_Press@nps.gov](mailto:Dave_Press@nps.gov)  
Subject: Point Reyes, Elk, and Plan B - Urgent action needed!

To those that have the opportunity and power to do the right thing,

I am writing regarding the proposed renewal of farming and ranching leases on Point Reyes National Seashore. Point Reyes and its Tule Elk are rare treasures and deserve the concern and protection of the National Park Service. Please reconsider the extension and expansion of the current farming and ranching leases, and start phasing out these operations that misuse the park and endanger the existence of the rare Tule Elk. At the very least, allow no further expansion of current operations, and dismantle the 8 foot high fence that restricts the free movement of the elk and prevents their access to perennial streams that provide them water and forage.

Please reexamine Plan B of the Environmental Impact Statement for Point Reyes, and find an alternative to this misguided decision. We and the elk are counting on you!

Daniel C. Eckhard, DMD, Berkeley Resident and Point Reyes enthusiast

---

**From:** Laura Phillips <[spikey@pixar.com](mailto:spikey@pixar.com)>  
**Sent:** Monday, September 28, 2020 10:31 PM  
**To:** Ainsworth, John@Coastal <[John.Ainsworth@coastal.ca.gov](mailto:John.Ainsworth@coastal.ca.gov)>  
**Cc:** [gavin@gavinnewsom.com](mailto:gavin@gavinnewsom.com); [PORE\\_Info@nps.gov](mailto:PORE_Info@nps.gov); [careyfeierabend@nps.gov](mailto:careyfeierabend@nps.gov);  
[Woody\\_Smeck@nps.gov](mailto:Woody_Smeck@nps.gov); [Dave\\_Press@nps.gov](mailto:Dave_Press@nps.gov)  
**Subject:** Point Reyes Tule Elk slaughter -

You have the power and the responsibility to take the right and humane action, and be on the right side of history. I am writing regarding the proposed renewal of farming and ranching leases on Point Reyes National Seashore under the Point Reyes General Land Management Plan.

As I'm sure you know, to keep the elk off grass reserved for cattle, the NPS confines the Elk behind a fence at Pierce Point, where **half the herd died during the drought. The NPS plan proposes killing any free-roaming elk that wander onto leased land** — a scheme that drew thousands of public comments. **With over 7,600 comments, 91% of the concerned respondents wanted native Tule Elk protected and cattle**

ranching removed from Point Reyes.

Point Reyes and it's Tule Elk are rare treasures and deserve the concern and protection of the National Park Service. Please reconsider the extension and expansion of the current farming and ranching leases, and start phasing out these operations that misuse the park and endanger the existence of the rare Tule Elk. At the very least, allow no further expansion of current operations, and dismantle the 8 foot high fence that restricts the free movement of the elk and prevents their access to perennial streams that provide them water and forage.

Please reexamine and STOP Point Reyes General Land Management plan, and find an alternative to this misguided decision. Your constituents have spoken. The magnificent Tule Elk deserve so much better than this, and it is in your power to do the right thing!

Laura Phillips,

Art Director Pixar Animation Studios  
San Anselmo resident  
3rd generation Californian  
Tule Elk and Point Reyes appreciator and protector

**From:** J G <[judithrachelleg@gmail.com](mailto:judithrachelleg@gmail.com)>

**Sent:** Monday, September 28, 2020 11:35 PM

**To:** Ainsworth, John@Coastal <[John.Ainsworth@coastal.ca.gov](mailto:John.Ainsworth@coastal.ca.gov)>

**Subject:** Save the Pt. Reyes elk!

This is insanity that the NPS is killing protected elk and working for private ranchers, not protecting the land, water and wildlife in the national park. The ranchers were paid to leave decades ago and corrupt politicians like Jared Huffman get paid off by ranchers to extend leases and break laws. The cows and ranchers destroy native plants, pollute land and water all for helping a few private businesses make a profit instead of caring for the land and wildlife for the public use.

Over 1/3 of the park is already ruined by the ranchers and blocked off from use by the public and wildlife. This is so wrong! There are more cows in the park than tule elk in the world. There are only 250 elk and NPS wants to shoot half of them and bring in more polluting cows and other domestic farm animals to a public park! This is pristine protected land and yet the water pollution is so bad it is some of the worst water in the country! I can't safely swim in Tamales Bay.

Please stop them from ruining the park completely. Save the land, the water, the wildlife from destructive private industry which has no place in our public lands.--

Contra Costa resident and tax-paying citizen, AKA your boss

♥ Judith Gottesman, MSW ♥

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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:** louis gauci <[lgauc8@gmail.com](mailto:lgauc8@gmail.com)>  
**Sent:** Saturday, January 9, 2010 10:36 AM  
**To:** Weber, John@Coastal <[john.weber@coastal.ca.gov](mailto:john.weber@coastal.ca.gov)>  
**Subject:** Please Save Point Reyes Tule Elk and its Environment

Dear Mr. John Weber,

As someone who is concerned about wild animals and wildlands, and one of over 250,000 In Defense of Animals supporters, I urge you to oppose the staff-recommended conditional compliance to the Point Reyes General Land Management Plan Amendment (GLMPA) and object to the National Park Service's consistency determination, which is not consistent with the California Coastal Management Plan.

The CCC received over 20,000 comments opposing the park's plan to continue ranching leases within the national park. We applaud the Commission for postponing the public hearing, which will allow enough time to adequately review and analyze comments with scientific and technical data.

The staff report focused on water quality, yet the last tests were documented in 2013. In Defense of Animals recently performed professional scientific water quality tests from key collection points at Point Reyes National Seashore. Now the Commission has ample opportunity to review these new findings.

The report also did not address other spillover effects from the Point Reyes GLMPA, including air quality and climate impacts from grazing cows, water quantity, and the loss of coastal public access.

Unfortunately, the current administration is now rushing through a plan to start killing the elk and prioritize ranching over wild animals at the Seashore for two more decades.

Please protect our waterways and the Pacific Ocean from harmful spillover impacts.

Thank you for your consideration of this important and timely matter.

Sincerely,

Louis

**From:** Samantha Sage <s.sagearts@gmail.com>

**Sent:** Sunday, January 10, 2021 4:55 PM

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

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

**Subject:** Last of the Tule Elk @ Point Reyes National Seashore..

Dear public servant,

The Tule Elk is an endemic species to California. Hundred of years ago, approximately 500,000 Tule Elk roamed these lands under the original stewardship of the Coast Miwok. These numbers drastically dwindled after the first settlers arrived in 1776 and by the time the Gold Rush came around, the elk had been hunted and displaced by cattle, nearly wiped out to the point of extinction. One of the last remaining pairs were brought to Point Reyes in 1978 as a conservation effort that proved to be successful. The species was able to bounce back from near extinction. Point Reyes National Seashore is the only national park where you can see the Tule Elk. It is also the only National Park that has large private ranching operations that have already been paid millions of dollars to leave.

Today, the Tule Elk again are at the center of an epic conservation battle at Point Reyes. The National Park Service released it's new pending management plan that would continue prioritizing private ranching industries at the expense of the health of native wildlife, ecology and access to public lands. Despite 90% of the public voting to phase out private ranching and dairy operations from the park. This is basically an attack on our public lands rooted in deep history of colonization, politics and greed...The California Coastal Commission will be voting whether or not to approve or reject this plan.

Gratefully a colleague shared this information on social media. As a Bay Area local, I am concerned about the health of our fragile ecosystem.

With great care,

Samantha Sage

To help protect our sacred public lands and wildlife, please follow @forelk\_

To learn more, you can also follow @restore\_our\_seashore #wildlife #conservation #tuleelk #pointreyes #nationalpark #outdoors #nationalseashore #natgeo #nationalgeographic #wildlifephotography #shooters #sonyalpha #ecologicalrestoration #nature #earthpix #stewardship #california #endangeredspecies

**From:** Barbara Affonso <affonso@earthlink.net>  
**Sent:** Sunday, January 10, 2021 4:25 PM  
**To:** Coastal Point Reyes Management Plan <PointReyesManagementPlan@coastal.ca.gov>  
**Cc:** Weber, John@Coastal <john.weber@coastal.ca.gov>; Craig\_Kenkel@nps.gov  
**Subject:** General Land Management Plan for Point Reyes National Seashore

January 10, 2021

Dear California Coastal Commission,

I am writing to ask you to vote AGAINST the staff-recommended conditional compliance to the Point Reyes General Land Management Plan Amendment (GLMPA) and to object to the National Park Service consistency determination. The vote is scheduled for January 14th, which is just a few weeks after the staff report first came out. The thousands of comments sent to the CCC by those opposing the park's plan to continue commercial cattle operation within the National Park, contain scientific and technical data that needs much longer to analyze than just a few weeks. More information is still being gathered and will be submitted.

The National Park Service denied the CCC staff's request to have until March 2021 to analyze all the information before issuing the report. By asking that the vote happen in January, they are denying adequate time for a proper assessment of the plan in order to determine if it is compliant with the California Coastal Management Act.

This is a decision that will impact the California Coast for the next several decades. All the relevant information should be given enough time for a thorough analysis. Please help to ensure that our park is kept alive and that we, as Californians, continue to maintain our environmental integrity. Please vote against the conditional compliance on January 14.

Thank you for your sincerest consideration,

Barbara Affonso

40 year resident of Mill Valley, Marin County

Lifetime resident of California



**From:** Paul Rea <paulrea@sbcglobal.net>

**Sent:** Sunday, January 10, 2021 3:25 PM

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

**Subject:** ✓ The Best Future for Point Reyes

Members of the Coastal Commission ~

I do realize that the future of Point Reyes National Park is a complex question, and that the historic ranching operations do appeal to some visitors.

But when all things are considered—the pollution, the displacement of important wildlife, the implicit affirmation of grazing, and the commercial intrusion in a marvelous park—the scale has to tip toward phasing out the ranches. After all, doing this was called for in the original plan for the park.

Sincerely ~

Paul W Rea

--

Paul W Rea PhD  
730 Blossom Way Apt #28  
Hayward, CA 94541  
[510] 674-9288

**From:** lbr8.anmlz@yahoo.com <lbr8.anmlz@yahoo.com>

**Sent:** Saturday, January 9, 2021 12:12 PM

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

**Subject:** Point Reyes Elk

Reject the **NPS'** recommended management plan which expands this National Seashore's cruel beef and dairy operations at the expense of its wildlife. It's time to be the change & protect our wild.

-Carolita

From: Stan Schilz <binker3@icloud.com>

Sent: Saturday, January 9, 2021 7:06 AM

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

Subject: Pt Reyes

Good morning,

I feel VERY STRONGLY that cattle should be relocated OUT/OFF the Pt Reyes area and the elk population be allowed to increase to reasonable size.

Thanks,

Stan Schilz

San Rafael, CA

**From:** Valerie Constant-Winters <grammy11us@msn.com>

**Sent:** Friday, January 8, 2021 3:47 PM

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

**Subject:** ELK

I hope you enjoy causing the horrible, painful death of the elk. Too bad the role is not reversed, you would die of thirst. So, you watch them die, go drag out the emaciated bodies and dispose. No remorse and go on with their daily sadistic lives.

Sent from [Mail](#) for Windows 10

**From:** Ruth Bauman Britton <[rbbritton@comcast.net](mailto:rbbritton@comcast.net)>

**Sent:** Friday, January 8, 2021 10:20 AM

**To:** Coastal Point Reyes Management Plan <[PointReyesManagementPlan@coastal.ca.gov](mailto:PointReyesManagementPlan@coastal.ca.gov)>

**Subject:** Management Plan faulty

I agree with the points discussed by the Marin Audobon Society that the Management Plan needs to be clarified and the preferred alternative changed to enable more environmental safeguards for the Seashore. Wildlife needs more protection, as do streams and wetlands.

Environmentally Sensitive Areas need to be identified and protections need to be specified.

Ranch uses are too broad.

Including small farm animals is probably not a good idea since more diversification will impact wildlife.

Water resources are limited and becoming more so as drought continues. Beef and dairy ranching uses a tremendous amount of water; the current proposals don't really have enough specifics about water diversion and its effects on wildlife.

Elk are being increasingly marginalized to protect ranches. There seems to be no clear movement corridor for elk and other wildlife, which will endanger their survival.

The lease language for monitoring and enforcement in the Seashore is too vague; non-compliance should have penalties attached. There are not enough staff provided to implement the Management Plan. The two staff for which funding has been approved need to work to ensure natural resource protection, and as a result more staff is needed.

For these and other reasons the Management Plan needs to be rejected as offered and better, more specific, wildlife-friendly proposals need to be written

Thank you,

Ruth Britton

50 Via Belardo #16

Greenbrae 949904

[rbbritton@comcast.net](mailto:rbbritton@comcast.net)

415 461 3916

**From:** Philip Hoffman <hoffmanp@sonic.net>

**Sent:** Thursday, January 7, 2021 7:07 PM

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

**Subject:** RANCHES ALONG HIWAY 1

Please protect our natural heritage over the commercial ranching on the Point Reyes Peninsula. Remove the ranches from the Peninsula and locate them along HIWAY 1. , where the cattle herds will provide fire suppression and are not competing with elk and the other native species.

Thank you,

Phil Hoffman

Sent from [Mail](#) for Windows 10

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

**Sent:** Thursday, January 7, 2021 6:23 PM

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

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

Dear CCC:

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:** Young Scott <youngscott@sonic.net>

**Sent:** Thursday, January 7, 2021 4:34 PM

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

**Subject:** Coastal Access

To whom it may concern:

Coastal access to Point Reyes National Park can sure be improved. The best way to improve coastal access is to remove the hundreds of miles of cattle ranch barb wire fencing strands that block coastal access. Currently, walking to the coast at many areas in PRNS is lots of manure muck that can eventually flow down to the sea, the manure attracts biting Horn Flies & Stable Flies, the cow manure also attracts Face Flies & Filth Flies all of which can spread diseases to people.

The buildings at PRNS should be used by park rangers, staff, welcome centers, educational centers, camp sites, schools and scientists trying to improve our beautiful California coast Not polluting for-profit cattle ranches. This land was paid-in-full for years ago by you the taxpayers and should reflect the effort to improve the California coast not deteriorate the California Coast with polluting cattle ranches.

from,

scott young

petaluma ca.



**From:** Diana Muhanoff <dianamuhanoff@yahoo.com>  
**Sent:** Thursday, January 7, 2021 2:56 PM  
**To:** Coastal Point Reyes Management Plan <PointReyesManagementPlan@coastal.ca.gov>  
**Cc:** Weber, John@Coastal <john.weber@coastal.ca.gov>  
**Subject:** Pt. Reyes GLMPA

California Coastal Commission,

Please vote against the staff recommended conditional compliance to the Pt. Reyes GLMPA scheduled for January 14th it does not comply with the California Coastal Management Plan.

More time needs to be allotted to this very important decision. Addressing spill over effects water quality and climate impacts from cattle. Cattle ranching and farming will expand at the expense of the native wildlife and our access to public land.

For all of these reasons please vote against the conditional compliance recommendation.

Regards,

Mr. Alex Muhanoff

Mrs. Diana Muhanoff

[Sent from Yahoo Mail on Android](#)

**From:** Sabrina Commisso <sabrinasantcomm@gmail.com>

**Sent:** Thursday, January 7, 2021 2:55 PM

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

**Subject:** Opposition to Point Reyes Tule Elk killing

Hello,

As a visitor to the Point Reyes National Seashore, I oppose the killing of the Tule Elk as part of the General Management Plan Amendment.

Please do not agree to this amendment. You have the power to oppose this plan which kills an endemic, keystone species in California at the benefit of a few private ranchers. It is a national park belonging to everyone in the country, visited by people all around the world. The visitors come to Point Reyes partly to experience the elk, not to visit or smell a dairy or cattle farm. The elk are iconic to Point Reyes because California has worked for years to expand its range and population. The elk represents the area, as seen in the Point Reyes National Seashore Association symbol. Don't undo this work and vote in favor of this amendment.

The expansion of the leases to 20 years to an industry whose products fewer and fewer people drink also isn't logical. To encourage the further pollution of this seashore by giving the ranchers a thumbs up for such a lengthy period is not working towards the protection of this national park. Because we all know, once you have approval, it's very difficult to take it away.

This Park should be managed to protect the rare and threatened flora and fauna including the elk, not for cattle.

Thank you,

Sabrina Commisso

From: james field <jtflld@msn.com>  
Sent: Thursday, January 7, 2021 1:03 PM  
To: Coastal Point Reyes Management Plan <PointReyesManagementPlan@coastal.ca.gov>  
Cc: gavin@gavinnewsom.com; Craig\_Kenkel@nps.gov; jared.huffmann@mail.house.gov;  
diannefeinstein@senate.gov  
Subject: Re: January Meeting Agenda Item 6b

Commissioners,

Free-roaming tule elk at Point Reyes National Seashore are magnificent animals that deserve protection from being removed—or worse, killed—from the National Seashore.

I strongly urge California officials to vigorously oppose the Point Reyes-North District Golden Gate NRA General Management Plan and Environmental Impact Statement at next Thursday's hearing of the California Coastal Commission. The current plan will eliminate the free-ranging tule elk in Point Reyes National Seashore, despite vehement opposition from California residents and wildlife advocates.

Up until a few decades ago, tule elk, endemic to California, were thought to be extinct because 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.

Today, the tule elk are living proof of the success of conservation.

It is unreasonable to support the Point Reyes-North District Golden Gate NRA General Management Plan and Environmental Impact Statement—a plan that will eliminate the free-ranging tule elk that were so recently brought back from the brink of extinction, and that the Park Service and many others fought so hard to re-introduce.

I am writing to ask you to please find the NPS Consistency Determination for the General Management Plan Amendment/Final Environmental Impact Statement (GMPA/EIS) for Point Reyes National Seashore and the north district of Golden Gate National Recreation Area not consistent with the California Coastal Management Program.

This plan is not consistent to the maximum extent practicable with the California Coastal Management Plan for many reasons. It would allow significantly new development, uses and activities on national parkland which would irreversibly and negatively impact the nearby coastal zone resources and public enjoyment of the coastal zone. For example, the expanded and new agricultural uses and intensity would heighten the already troubling impacts to water quality in nearby streams, further threatening endangered salmonids in the area.

This plan would also treat native tule elk as problem animals to be killed or hazed, while authorizing additional and expanded agriculture uses which are certain to cause further conflicts between ranching operations and native wildlife. Native tule elk were brought back from the brink of extinction and Point Reyes National Seashore is the only national park where tule elk are found. The public, including myself, would be devastated at the thought of intentionally killing these majestic creatures. This in no way conforms with your mandate of protecting our recreational opportunities and public enjoyment of the coastal zone.

For all these reasons, I urge you to find the GMPA/EIS not consistent with the California Coastal Management Program. Thank you for your consideration.

Sincerely,  
james field

**From:** Eileen Flynn <eileenflynn2011@gmail.com>

**Sent:** Thursday, January 7, 2021 11:18 AM

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

**Cc:** craig\_kenkel@nps.gov; Weber, John@Coastal <john.weber@coastal.ca.gov>

**Subject:** VOTE NO on Conditional Compliance to Point Reyes GLMPA

Dear Commissioners,

I have read the EIR and the recommendations made with respect to the cattle ranching at Point Reyes National Seashore and am appalled. As someone with multiple environmental degrees, the damage cattle ranching has to the environment is not trivial. The fact that most of the options were to keep cattle ranching in some form or another is outrageous! There was only one option that actually preserves the park and park grounds.

One of the arguments I've heard is that they are historic ranches that have been operating the same way for decades. This is NOT true. When the ranches were first established, they had very few heads of cattle - this means a much smaller impact on the environment. Now, today - these ranches have 500-1500 head of cattle which creates a much larger environmental risk. This argument is completely inconceivable - 20 heads of cattle is dramatically different to a 1000! The amount of manure runoff to the streams is exponentially different.

Additionally and perhaps even more importantly, the *staff report lacked sufficient data* on other spillover effects from the Point Reyes GLMPA. For example, nothing about water quantity was addressed in the entire Point Reyes National Seashore portion of the planning area. Climate impacts from cattle was not addressed. What about effects on migratory birds, eelgrass, orcas, and endangered salmon? As a scientist, I have no doubt that properly conducted environmental impact studies will confirm unacceptable deleterious effects of commercial cattle operations. When making a decision that will impact the California Coast for the next several decades, it is imperative to have all the relevant information, and enough time to analyze that information.

It is the JOB of NPS to PROTECT the environment NOT protect big agriculture! Since they refuse to do their job, I am pleading with you - please protect our parks for future generations.

**Please vote against the conditional compliance on January 14th.**

**Thank you for your time.**

**Sincerely,**

**Eileen Flynn**

**Scientist, Berkely resident and frequent hiker at Point Reyes**

**From:** Beth Cataldo <b.cataldo@gmail.com>

**Sent:** Wednesday, January 6, 2021 8:39 PM

**To:** nrdems@mail.house.gov; Coastal Point Reyes Management Plan <PointReyesManagementPlan@coastal.ca.gov>; Craig\_kenkel@nps.gov; Simon, Larry@Coastal <Larry.Simon@coastal.ca.gov>

**Subject:** Feedback concerning Pt. Reyes plan/problems with water quality

To the Point Reyes Management Plan team,

I am writing to ask you, the California Coastal Commission, to reject the decision that has been made concerning Point Reyes National Seashore for the protection of the biodiversity and overall environmental health of our coastline.

My experience as a volunteer in two capacities at Point Reyes National Seashore has provided me with insight into the detrimental short- and long-term effects that the ranches have on our public lands, native plants and animals and oceans. I will describe what I have seen during more than 500 visits to Point Reyes over the past 20 years.

**Winter Wildlife Experience:** I have been a Winter Wildlife volunteer for 10 seasons, spending time from January until April each year talking to visitors about elephant seals, whales and other wildlife that visit the park. During this time, I have seen raw sewage from the cattle flow directly into the ocean at Drakes Beach.

One time in particular stands out, in 2019 after a heavy rain. While I was talking to visitors at the north end of the beach, we wondered where the strong smell of cow manure was coming from. When we looked down at the stream, which was running into the ocean, and saw the brown sewage, we found where the smell was coming from. This continued all day as we watched the ocean turn brown.

There aren't any signs alerting the public of this sewage. Children and adults walk through and play in this stream. I have also seen wildlife, including elephant seals, river otters and migrating birds, using this waterway.

I took videos of the flowing water and its proximity to people and wildlife. In it, the ocean is turning brown, which was difficult to capture. I have posted the video on my YouTube channel. You can see that footage here:

[https://youtu.be/byA9v3B\\_MFI](https://youtu.be/byA9v3B_MFI)

When I alerted the park staff via email about the pollution and stench, they wrote me back, stating that:

"Facilities looked at the pipe for the Drakes VC sewage system and did not detect any leaks. Range staff checked from the parking lot upstream to the pond for signs/scents of manure - didn't detect anything unusual. I also talked to the ranch operator and it sounds like they were spreading manure on the flat areas of the D Ranch field along Drakes Beach Road during that time, so that may have been the source of the smell."

This tells me that the ranch's everyday operations cause pollution in our oceans. There is nothing that the Park employees can do to mitigate this. The employees could only shrug since the Park Service allows dairy ranches to spread liquid cattle manure on grasslands throughout the park.

**Beach Watch Experience:** For more than 15 years, I have walked the Great Beach (North Beach to Abbotts Lagoon) each month for the Beach Watch program, counting the live and dead animals on the beach and in the water. This data that we gather add to a database of information NOAA uses to assess ocean and beach health.

During this time, I have seen Abbotts Lagoon turn brown, clearly from the runoff from the cattle who live up the road. This area also lacks signage about the possible pollution for those who are fishing and playing near the water.

Many birds - both migratory and residential - and mammals find their food in Abbotts Lagoon. I can't help but wonder what eating fish from this area with these levels of pollutants do to them.

Before I wrote this feedback, I wanted to make sure that I wasn't exaggerating my experiences. I researched to see if anyone had tested the water there and I found a report. The link is below.

The data referenced in the report, which were collected throughout the country, show that "The livestock-polluted waters of Point Reyes National Seashore rank in the top 10 percent of U.S. locations most contaminated by feces indicated by E. coli bacteria."

The report also discloses that "Point Reyes National Seashore has been one of the 10 most feces-contaminated locations monitored in California since 2012 and that the state's highest reported E. coli level was on a Point Reyes cattle ranch."

The report goes on to state that "The Park Service's assessment determined that dairies pollute the Drakes Estero, Limantour, Kehoe and Abbotts 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."

This report and references to the data can be found online:  
<https://therevelator.org/wasted-water-crappiest-places/>

Given these findings, I find it hard to understand why the National Park Service recommends continuing and extending ranching in this beautiful area that future generations of humans and animals would like to enjoy. Let's be clear: the e. coli from the cattle is affecting the waters on the coast of California. I witnessed this firsthand.

The National Park Service is supposed to manage these public lands for "the greatest good for the greatest number." With the many challenges this country faces in light of the changes in climate, protection of natural resources and biodiverse regions along the coast of California should be our priority.

Politicians of diverging opinions come together on the importance of our parks.

George W. Bush stated: "Our National Parks belong to each of us, and they are natural places to learn, exercise, volunteer, spend time with family and friends, and enjoy the magnificent beauty of our great land."

President Roosevelt said: "There is nothing so American as our national parks.... The fundamental idea behind the parks...is that the country belongs to the people, that it is in process of making for the enrichment of the lives of all of us."

I am in full support of honoring the original spirit of our national parks. The best solution is to:

- Phase out ranches
- Remove commercial livestock
- Prioritizes wildlife over cattle
- Restore wildlife habitat to native plants

I support Alternative F of the General Management Plan Amendment Draft Environmental Impact Statement. I do this in the spirit of Theodore Roosevelt, who said:

"The 'greatest good for the greatest number' applies to the number within the womb of time, compared to which those now alive form but an insignificant fraction. Our duty to the whole, including the unborn generations, bids us restrain an unprincipled present-day minority from wasting the heritage of these unborn generations. The movement for the conservation of wildlife and the larger movement for the conservation of all our natural resources are essentially democratic in spirit, purpose, and method."

Thank you for your consideration,

Beth Cataldo

692 8<sup>th</sup> Avenue

San Francisco, CA 94118

**From:** elisecypher@umail.ucsb.edu <elisecypher@umail.ucsb.edu>

**Sent:** Wednesday, January 6, 2021 6:41 PM

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

**Subject:** I do not support the NPS plan

I do not support the NPS plan. The biodiversity at Point Reyes is critically important and should be preserved and restored. Please object to the Park Service's CD.

Thank you,

Elise Cypher



January 7, 2021

Dear Commissioners,

I read the recently published California Coastal Commission staff recommendations regarding the Point Reyes General Land Management Plan Amendment and I *strongly disagree*. Please vote AGAINST the staff-recommended conditional compliance to the GLMPA, and instead object to the National Park Service consistency determination, as it is NOT consistent with the California Coastal Management Plan.

Please do not rush to hastily vote on January 14. It is important for the people of California to not succumb to the political pressure from the NPS and Big AG. It is no coincidence that the vote will happen just a week before the current administration leaves office. The CCC staff had requested until March 2021 to analyze the information before issuing the report.

The staff report lacked sufficient data on the spillover effects from the Point Reyes GLMPA. Water quality was not addressed nor climate impacts from cattle. Effects on the wildlife is also essential. As a scientist and veterinarian, I have no doubt that properly conducted environmental impact studies will confirm unacceptable deleterious effects of commercial cattle operations. It is imperative to have all the relevant information, when making a decision that will impact the California Coast for the next several decades.

Please vote against the conditional compliance on January 14<sup>th</sup>.

Sincerely,

Ken Gorczyca

Veterinarian

San Francisco

Peter Warner  
5381 Thomas Road  
Sebastopol, CA 95472

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

[Sent & delivered by email to the Commission, January 2021]

RE: **Agenda Item CD-0006-20:** Coastal Consistency Determination for the Point Reyes National Seashore (PORE) & North District, Golden Gate National Recreation Area (GOGA), General Management Plan Amendment and Environmental Impact Statement

Dear Commission Members:

I write to request that you deny consent for the consistency determination for this General Plan Amendment (GMPA) and Environmental Impact Statement (EIS). The GMPA and EIS are incomplete, inadequate, and ecologically errant as exercises in planning and management for public lands.

The California Coastal Commission (CCC) staff's provisional concurrence with the consistency determination is also subject to scrutiny. In its concessions to the federal government and to the U. S. Department of the Interior (DOI) and the National Park Service (NPS), the CCC has defaulted to lines on maps by which to assess ongoing and potential impacts to California's coastal environments – the coastal zone is, in fact and in policy, an ecological region, not defined by a measure of distance, constrained to human constructs, or otherwise contrived through any means of institutional convenience. Explicitly, under both the National Environmental Policy Act and the California Environmental Quality act, all actual and potential impacts of public projects must be assessed and mitigated, including direct, indirect, cumulative, and off-site impacts or conditions that may lead to expression of impacts on the environment. Such assessments and analysis thereof must incorporate the full scope of environmental impacts; any default on requiring analysis of off-site impacts or deference to an inadequate management plan and EIS is ecologically unjustifiable, and may be legally indefensible. CCC must demand that NPS assess and mitigate all real (past and current) and potential future impacts, direct or otherwise, on the entirety of the California coastal zone.

The ecologically pertinent impacts that are not adequately discussed or assessed in the GMPA/EIS include the following:

- Direct, indirect, and cumulative impacts on coastal water quality as a result of on-site and off-site water pollution sourced in ranching and dairy operations:

“California Coastal Commission Authority: The legal opinion for the Coastal Act concludes that the Coastal Commission has adequate legal authority under the Coastal Act to enforce water quality requirements related to nonpoint source pollution (see Appendix B of the Program Plan). A central focus of the Coastal Act is the protection, and where feasible, restoration of coastal water quality. (California Coastal Nonpoint Program NOAA/EPA Decisions on Conditions of Approval (p. 5, July 2000).”

- Direct, indirect, and cumulative impacts on coastal ecosystems (e.g, upland springs and marshes, riparian scrub, eelgrass beds, kelp beds, mud flats, strand and beach) functions, processes, and composition as a result of on- and off-site ranching- and dairy-sourced water pollution;
- Disruptions in coastal ecosystem functions and species compositions through the introduction and establishment of non-native plant species resulting from ranching and dairy operations;
- Pathogenic disease transmissions by domestic livestock to wildlife species;
- Contributions of methane, carbon dioxide, and other “greenhouse gases” above ambient levels, thereby contributing to long-term climate alterations;
- Disruptions to wildlife and native plant habitat and discontinuities between native ecosystems fostered by ranching and dairy operations, including fencing, roads, outbuildings, and depletion of local water sources;
- Deliberate destruction of wildlife species to abet private industry with consequent ecological losses (elk foraging is an essential ecological function) and likely social consequences (elk constitute a primary visitor attraction to PORE);
- Alterations in species’ interactions and trophic dynamics through ranching and dairy operations (e.g., feed and forage that promotes corvid (crow, raven) predation on snowy plover eggs and hatchlings);
- Ongoing depletion of plant cover resulting in excessive sediment-loading and organic pollution of coastal streams and other aquatic environments;
- Destruction of soil quality and texture and micro-organic composition, and alterations to soil nutrient dynamics through grazing and other ranching practices.

The foregoing is by no means a complete list of pertinent ecological concerns and impacts, and none are adequately assessed by NPS in the GMPA/EIS. Moreover, the extensive text devoted to “mitigations” in those documents dismisses any substantial discussion about the prevailing mitigation option for environmental impacts: complete avoidance of actions resulting in those impacts (Alternative F). The complexity and extent of the NPS-proposed mitigation measures provide ample testament to the real failures of all prior attempts by NPS to “mitigate” or otherwise resolve the deleterious impacts of ranching and dairy operations in the coastal zone or beyond, thus NPS is once again whitewashing history to justify retention of an ecologically unsustainable and socially unacceptable “tradition.” In my experience, mitigation programs are incompletely monitored and often not fulfilled, and regulatory mandates and performance standards almost never enforced, financially or ecologically. In my experience at Point Reyes, as a visitor and habitat rehabilitation volunteer, I’ve seen the environment in this national park continue to deteriorate – on ranch land and on adjacent publicly accessible land – with minimal support by NPS towards reversing the exacerbating circumstances. Yet, the public ends up footing the bills for management negligence as well as some ensuing conservation efforts that attempt

rehabilitation of the lands and waters rent asunder by private, for-profit industry. It's now up to the CCC to do its part to hold private industry (and its proxy NPS) accountable and financially responsible for actual environmental damages.

While not necessarily within its purview of jurisdiction on coastal environments, I also call attention to one of the fundamental elements underpinning this ecologically misinformed and politically motivated attempt by DOI and NPS to approve and implement this GMPA and EIS: resort to an antiquated, biased, myopic, and racist revision of history to justify retention of private ranching and dairy operations within the Point Reyes National Seashore and parts of Golden Gate National Recreation Area. An accurate history would assemble with equity the entirety of all historical evidence, and cast that history within the context of recent, current, and future cultural, ecological, and social circumstances. Yet NPS continues to resort to historically deceptive and non-factual posturing for the sake of current political expediency, promoting the retention of private industries on public land in full defiance of sound science and professional ethics, willfully abetted by ethically compromised members of Congress and other vested interests, and with deliberate dismissal of informed public opinion.

I trust that CCC will **reject this application for a consistency determination by NPS.**

Thank you for your consideration of these remarks in your decision.

Sincerely,



Peter J. Warner

Sebastopol, CA

- BS, MA in Plant Ecology (Sonoma State University)
- Botanical and ecological consultant & educator
- Former research coordinator for NPS – Golden Gate National Recreation Area
- Former restoration coordinator for the Golden Gate Parks Conservancy
- Retired environmental scientist (ecologist), California State Parks
- National Park Service volunteer (Pt. Reyes National Seashore, GGNRA, Yosemite National Park)

From: Craig Orbelian <craigorbelian@gmail.com>  
Sent: Wednesday, January 6, 2021 1:36 PM  
To: Coastal Point Reyes Management Plan <PointReyesManagementPlan@coastal.ca.gov>  
Cc: gavin@gavinnewsom.com; Craig\_Kenkel@nps.gov; jared.huffmann@mail.house.gov;  
diannefeinstein@senate.gov  
Subject: Re: January Meeting Agenda Item 6b

Dear Commissioners,

Please find the General Management Plan Amendment/Final Environmental Impact Statement for Point Reyes National Seashore and the north district of Golden Gate National Recreation Area not consistent with the California Coastal Management Program.

Thanks for your consideration,  
Craig

cc: Governor Gavin Newsom

cc: Superintendent Craig Kenkel

cc: Representative Jared Huffmann

cc: Senator Dianne Feinstein

**MEMORANDUM**

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Date: January 4, 2021

From: Mary Anne Flett, Wildlife Biologist,  
Point Reyes Station, CA

To: Mr. John Weber, Analyst  
California Coastal Commission  
North Central Coast District  
455 Market Street Suite 300  
San Francisco, CA 94105

Subject: Issues related to deficiencies in the 2020 General Management Plan Amendment for Point Reyes National Seashore and Golden Gate National Recreation Area

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Dear Mr. Weber,

I'm writing today to highlight some concerns related to current ranching practices and their effects on wetlands and wildlife in Point Reyes National Seashore. These issues have not yet been adequately addressed or analyzed in the 2020 General Management Plan Amendment (GMPA), and so I respectfully request the California Coastal Commission to postpone signing off on the Federal Consistency Determination until the GMPA includes the following:

**1) Analysis of impacts of current ranching practices on wetlands and riparian areas**

During several recent recreational visits into the Point Reyes National Seashore to bird watch at various locations along Pierce Point Road, I observed three pumping stations located in naturally-occurring wetlands (not human-made stock ponds). Two of these stations are permanent, in-ground installations and one is a mobile station. The two permanent stations have existed for some time, but they have been enlarged and upgraded recently. Two of the pump stations are in the Kehoe Beach watershed and the third is located in a wetland in the Abbott's Lagoon watershed. The pumps have been running every time I've passed by, and they are diverting water that should feed and enhance creeks, wetlands, and habitats downstream and then flow naturally into the ocean along Point Reyes National Seashore.

In my professional experience, dewatering a wetland or stream always requires permits (and mitigation measures) from the U.S. Army Corp of Engineers and the California Department of Fish and Wildlife (CDFW). I am very concerned about the impacts to the watershed due to dewatering of these wetlands as well as the effects on wildlife who depend on wetlands and surface water to survive.

How much natural flow from the watershed above the creeks that flow into Abbott's Lagoon and Kehoe Beach would be expected if no water were pumped out of the watersheds above these locations? Do the ranchers have permits to legally withdraw water and if so, are there specified amounts that are allowed to be withdrawn? Are the amounts of captured water monitored - and who is responsible for monitoring and tracking the quantity of water pumped out of the wetlands? Has anyone studied impacts on resulting from dewatering the wetlands? Is anyone tracking the remaining water levels in and below the pumping locations to determine the effects on wetlands-dependent species such as California Red-legged Frogs (USFWS Endangered, CDFW Threatened)), Pacific/California Giant Salamanders (*Dicamptodon ensatus*) (CDFW Species of Special Concern), or Common Yellowthroats (*Geothlypis trichas sinuosa*) (CDFW Bird Species of Special Concern, priority 3)? How much water would be expected to enter Abbott's Lagoon and the creek at Kehoe Beach and flow into the ocean if pumping were not occurring upstream?

Using GPS-tagged photographs that I took in the field, I mapped the locations of the three pumping operations I observed onto a Google Earth map (below). The locations are numbered from 1-3, north to south. Please also see selected and annotated photographs of each of the three pumping locations, which are shown below the Google Earth map.

Google Earth map showing locations of three pumping stations along Pierce Point Road, Point Reyes National Seashore:



The following two photographs correspond with location #1 (note damage to wetlands and riparian



vegetation):



The following two photographs correspond with location #2:





The natural wetland is bisected by the raised ranch road through the wetland in location 2. It was formerly ponded above the road with ample surface water which supported dabbling ducks, geese, and other waterbirds.

And these two photographs correspond with location #3 (again, note damage to wetland vegetation):



**2) Analysis of impacts of current ranching practices on wildlife, particularly to birds that are protected by state and federal laws**<sup>1,2</sup>

Dewatering wetlands in the Kehoe and Abbott's Lagoon watersheds brings to mind another issue that is not considered or analyzed in the GMPA EIR. Under Alternative B, ranchers would be allowed to grow more hay for silage. Silage production involves planting hay that is harvested, fermented, and stored to feed to livestock during the dry season (and drought years). When the silage crop is growing, animals move in and birds nest in the planted fields. When the crop is harvested during nesting season, animals are impacted and bird nests, eggs, and young are destroyed.

In May 2014 I directly observed the destruction of a nesting population of Grasshopper Sparrows (*Ammodramus savannarum*) along the trail to Abbott's Lagoon during hay mowing. Grasshopper Sparrows are a declining species, listed as a California Species of Special Concern (Shuford and Gardali 2008). Other ground-nesting bird species, such as California Quail (*Callipepla californica*), Western Meadowlarks (*Sternella neglecta*) and Savannah Sparrows (*Passerculus sandwichensis*) were certainly also impacted at the time.

The mown field is adjacent to a pond that supports California Red-legged Frogs (*Rana draytonii*) (listed as Threatened in California) that move between the pond and their upland refugia (in gopher burrows) in the field. American Badgers (*Taxidea taxus*) (listed as a Species of Special Concern in California) inhabit burrows in and adjacent to the field that was mown. Burrows inhabited by these and other ground-dwelling species are collapsed by the weight of heavy equipment driving over them. The day that I watched mowing by the Abbott's Lagoon trail, a large flock of Corvids arrived and followed the mowing equipment. American Crows (*Corvus brachyrhynchos*) and Common Ravens (*C. corax*) were attracted by the disturbance to scavenge on frogs, snakes, rodents, insects, and other wildlife species that were exposed or killed during mowing. Corvids are known to depredate bird nests; attracting them to the area secondarily increased the risk to other species including Western Snowy Plovers (*Charadrius alexandrinus nivosus*) (Federally-listed as Threatened, California listed as a Species of Special Concern) which nest nearby in the Abbott's dunes and at Kehoe Beach. The day that I watched the mowing, I wrote to the park supervisor about what I'd observed. but they have done nothing to address it. Mowing and other ranching activities that adversely affect birds during nesting season is a violation of California State and Federal laws that protect migratory birds. Alternative B provides expanded opportunities for ranchers to increase acreage devoted to growing hay for silage production. Before that is allowed, scientifically valid studies and analysis of the effects of silage production should be performed to determine impacts on migratory and nesting birds and other species. The Park must uphold and enforce laws that protect native, nesting birds and require the ranchers to abide by those laws.





***Mowing at Abbott's Lagoon, May 2014. Note Corvids circling overhead.***

Common Ravens are thriving in the park. While they are a natural part of a balanced native ecosystem, their inflated numbers and range within the park are directly attributable to human and ranching activity. Ravens are opportunists that consume birds, bird eggs, small mammals, reptiles and amphibians, plant seeds including seeds in manure, and they are directly subsidized by ranching via hay and grain fed to livestock. Concentrations of 75-100 Ravens were noted in Aug 2019 at I-Ranch pastures (M.A. Flett, pers. obs.). According to the Draft GMPA, the park requires ranchers to limit Raven access to supplemental feed and shelter by installing covered feed bins, cleaning up waste grain around troughs, removing and placing troughs in enclosed structures, and storing harvested crops in enclosed structures - but these measures either haven't been implemented or they aren't working.

Common Ravens encroaching from ranches into Snowy Plover habitat is at odds with efforts to protect and increase numbers of this legally protected species. Among several recommendations in the Snowy Plover Management Plan (Hornaday et al. 2007) is: "Manage breeding and wintering habitat of the Pacific coast population of the western snowy plover to ameliorate or eliminate threats and maximize survival and productivity." Since 1986, The park has invested thousands of dollars of public funds (approximately \$65,000/year over the last 3-4 years) towards this effort, and yet the Raven population is still uncontrolled.

Tricolored Blackbirds (*Agelaius tricolor*), a nearly endemic species in California, are state-listed as Threatened and are rapidly declining. Small numbers of these birds formerly bred in western Marin County annually during the late nesting season (July–September) (Stallcup 2004). There has been no documented breeding in Marin County since then (CDFW 2018). Wintering flocks formerly numbering more than 10,000 birds assembled by mid-October near dairies on the Point Reyes Peninsula in the 1980s, but these numbers have been reduced to 3,000 or less in recent years (eBird Dataset 2016). Flocks of Tricolored Blackbirds still gather during the fall and winter on the dairy ranches at the outer peninsula of Point Reyes. However, nesting habitat for this species (emergent wetlands, blackberry patches and other dense vegetation thickets) has dwindled in the Park since 2004. Management that reduces cattle impacts on Tricolored Blackbirds' preferred habitat could be vastly improved. For example, restoring and protecting riparian vegetation to provide cover for roosting and nesting, enhancing habitat that supports diverse insect and plant populations for foraging, along with other protective measures that limit impacts of humans and cattle might allow historic Tricolored Blackbird nesting populations to re-establish in the Park.

I have been a professional wildlife biologist for over 40 years and through my work I have witnessed and studied the effects of livestock grazing on wildlife and habitat, particularly on birds. I conducted in-depth research on Willow Flycatchers, a species of bird that is completely dependent on wetlands and riparian habitat in Sierra Nevada mountain meadows for summer habitat and for nesting and raising young. These meadows have been heavily impacted by cattle grazing (trampling vegetation, impacting water quality in ponded water and waterways via manure, and increasing rates of nest parasitism by Brown-headed Cowbirds that are directly associated with livestock. These impacts are driving Sierran Willow Flycatchers towards extinction. I've published several articles about riparian birds and authored a petition on behalf of the California Department of Fish and Wildlife that led to listing of Willow Flycatchers as Endangered in California. At present, I continue to work in coastal wetlands conducting wildlife habitat assessments, searching for rare animal species, and identifying rare plants in order to evaluate the boundaries and extent of wetlands that are subject to federal jurisdiction and, when necessary, to determine measures that would avoid or mitigate the loss of those wetlands. I've authored and published scientific and technical reports about these wetlands-related projects and hold state and federal permits which are required to conduct studies on endangered marsh birds in California wetlands. I am deeply familiar with Point Reyes National Seashore and the Golden Gate Recreation Area, as I have worked in both parks and I live next to Point Reyes National Seashore, which I visit almost every day.

The park has not adequately addressed or analyzed impacts to wetlands and wildlife that result from current ranching practices in the GMPA Draft EIR. Before the final EIR is certified - and the Park's preferred Alternative B is approved - there should be serious analyses of impacts of ranching on wetlands and wildlife in the Park. I sincerely hope that the California Coastal Commission will require the Park to conduct peer-reviewed, science-based analysis of wetlands and wildlife issues that were inadequately addressed (or not addressed at all) in the General Management Plan Amendment before approving a plan that allows expanded ranching activities in the Park.

Sincerely,



Mary Anne Flett

Wildlife Biologist  
USFWS T&E permit #TE233373  
CDFG SCP & MOU #SC7407

<sup>1</sup> California State Codes that protect birds:

[https://leginfo.legislature.ca.gov/faces/codes\\_displaySection.xhtml?lawCode=FGC&sectionNum=3503](https://leginfo.legislature.ca.gov/faces/codes_displaySection.xhtml?lawCode=FGC&sectionNum=3503).

[https://leginfo.legislature.ca.gov/faces/codes\\_displaySection.xhtml?lawCode=FGC&sectionNum=3503.5](https://leginfo.legislature.ca.gov/faces/codes_displaySection.xhtml?lawCode=FGC&sectionNum=3503.5).

[https://leginfo.legislature.ca.gov/faces/codes\\_displaySection.xhtml?lawCode=FGC&sectionNum=3513](https://leginfo.legislature.ca.gov/faces/codes_displaySection.xhtml?lawCode=FGC&sectionNum=3513).

<sup>2</sup> Federal Migratory Bird Treaty Act:

<https://www.fws.gov/le/USStatutes/MBTA.pdf>

#### REFERENCES

California Department of Fish and Wildlife. 2018. A Status Review of the Tricolored Blackbird (*Agelaius tricolor*) in California. Accessed online on September 22, 2019  
<https://nrm.dfg.ca.gov/FileHandler.ashx?DocumentID=154287&inline>

Hornaday, K., I. Pisani, and B. Warne. 2007. Recovery Plan for the Pacific Coast Population of the Western Snowy Plover (*Charadrius alexandrinus nivosus*). Department of the Interior, U.S. Fish and Wildlife Service, Sacramento, California, USA.

[http://ecos.fws.gov/docs/recovery\\_plan/070924\\_2.pdf](http://ecos.fws.gov/docs/recovery_plan/070924_2.pdf)

Stallcup, R. 2004. Late nesting Tricolored Blackbirds in western Marin County, California. Central Valley Bird Club Bulletin 7:51-52.

Shuford, W.D., and Gardali T., editors. 2008. California Bird Species of Special Concern: A ranked assessment of species, subspecies, and distinct populations of birds of immediate conservation concern in California. Studies of Western Birds 1. Western Field Ornithologists, Camarillo, California, and California Department of Fish and Game, Sacramento.

cc:

Craig Kenkel, Supervisor, Point Reyes National Seashore

Ryan Olah, Coast Bay Division Chief, U.S. Fish and Wildlife Service

**From:** erin mcdonald <emcdonald212@sbcglobal.net>

**Sent:** Wednesday, January 6, 2021 1:33 PM

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

**Subject:** Tule Elk - re No on plan B

Dear committee. I am pro Tule elk herd. I am against Plan B. I am a California citizen and a frequent visitor to Point Reyes. I do not go to this beautiful area to see five thousand cows. I go looking forward to seeing the majestic Tule elk. I am in support of taking down their restrictive fencing and freeing the elk. There are few places they can be seen in California. They are a disappearing species due to lack of habitat, hunting and poaching. They are valuable to me and they are a species that deserve more space and more access to water. I urge you to support more elk in Point Reyes and less cows or other domestic farm animals. Thank you.

Erin McDonald

**From:** Carl Tilchen <carltilchenmusic391@gmail.com>

**Sent:** Wednesday, January 6, 2021 11:08 AM

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

**Subject:** I Object to Ranching on Point Reyes

I want to continue visiting & enjoying Point Reyes. I object to Ranching on Point Reyes: because natural habitats have not been protected from the impact of ranching activities, water quality issues from high levels of E. coli from excessive cattle waste & manure deposits in creeks that flow into the Pacific Ocean. This is not OK in a National Park! Do not reduce the land available to the Tule Elk (Endangered species) nor kill them!

Please protect our Point Reyes.

Carl Tilchen



**From:** Diana Oppenheim <dianamaycuts@gmail.com>

**Sent:** Wednesday, January 6, 2021 10:08 AM

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

**Subject:** the January 14th vote.

Dear CCC,

My name is Diana, and I founded forELK.org. Before founding this campaign, I did wildlife restoration in the coastal dunes for three years in Point Reyes. I've done work in sea turtle rescue, habitat defense, and coastal cleanups. I care about all ecosystems and all health on the planet, and Point Reyes is also personal for me. I know it and love it.

**I am writing to urge you to vote AGAINST the conditional compliance for the Point Reyes GLMP.**

I know you're in a bind-- you only have so much jurisdiction. And there are a lot of politics around this issue.

However, your decision is being rushed. NPS has declined your own request to take adequate time to review their plan. It is apparent that there isn't even enough information within their plan for you to make a sound assessment.

Your mission and your job is to protect the California coast. Please refuse to rush this decision based.

I know you are getting much more information on spillover effects-- things that actually need attention: The snowy plover population for example. When I worked in the dunes in Point Reyes for three years, one of the species we were protecting was the snowy plover. Sadly, each year they struggled. Their largest predator are the ravens. No matter the baskets, the methods of trying to protect their nests... the ravens would eat the babies. The raven population is exaggerated in this area due to the cattle industry.

This is one tangible example that the CCC needs to consider more closely when making a decision on the GLMP.

There are others: The eelgrass ecosystem is another. Migratory birds. Orcas.

Again, you have not had adequate time to review and consider all of this information. There are a lot of eyes on this topic. Take your time. Vote against the conditional compliance.

Thank you,

Diana

**From:** Garril Page <obility@comcast.net>  
**Sent:** Wednesday, January 6, 2021 8:40 AM  
**To:** Coastal Point Reyes Management Plan <PointReyesManagementPlan@coastal.ca.gov>  
**Cc:** nrdems@mail.house.gov; Craig\_kenkel@nps.gov  
**Subject:** Comment re CD-0006-20

Dear Commissioners:

re: CD-0006- 20 U.S. National Park Service General Management Plan Amendment

By the California Coastal Commission's mission statement:

"The Commission is committed to protecting and enhancing California's coast and ocean for present and future generations. It does so through careful planning and regulation of environmentally-sustainable development, rigorous use of science, strong public participation, education, and effective intergovernmental coordination."

In considering the Pt. Reyes National Seashore (PRNS) GMPA, I urge you Commissioners to look beyond the Staff Report's narrowly-focused, recommended conditional approval, CD-006-02. Conditional concurrence by the CCC would be an abdication based on lack of scientific data, a dismissal of public response, and a failure to call the laxity of the California Regional Water Quality Control Board to account. Instead, the Commission should embrace its obligations to protect coastal waters, ensure equal access, and provide robust public participation *through CCC's action in intergovernmental coordination.*

Unlike NPS, the CCC is not hobbled by Department of Interior Secretaries' exercise of arbitrary, discretionary decisions that diverge from most-favored public alternatives. NPS comment periods received over 8900 public comments with approximately 90% in opposition to NPS-preferred Alternative B giving 24 ranches 20-year leases and making our National Seashore a potential petri dish of zoonotic pathogens. Aside from failure to correct current hazards, NPS' selected alternative continues certain detrimental practices and creates further risks through its programmatic elements. This is in direct opposition to the Coastal Act section 30006:

"The Legislature further finds and declares that the public has a right to fully participate in decisions affecting coastal planning, conservation and development; that achievement of sound coastal conservation and development is dependent upon public understanding and support; and that the continuing planning and implementation of programs for coastal conservation and development should include the widest opportunity for public participation."

Known Hazards:

NPS own FAQ acknowledges Pt. Reyes' label as one of the 'the crappiest places in California'. This is based on data collected up to October 2017 following which NPS asserts that full analyses of water quality data from 1999-2013 indicate high levels of pollution are reduced. Where is the data on dangers to public health from pathogens carried into recreational areas frequented by visitors which surely would qualify as a "spillover effect" per CD-0006-02?

CCC Staff correctly cites Coastal Act sections 30230 and 30231 as relevant concerns, but subsequent circumventions in the Staff Report may prevent needed scrutiny of the NPS proposals. For example, that water quality standards for pollutants relating to ranching activities are "generally being met" is an unfortunate and misleading dismissal of concerns that are justly within the CCC purview.

There are over forty-five zoonotic bovine pathogens classified as bacterial, parasitic, viral, fungal, or prion, and include among the more familiar names: *e.Coli*, brucellosis, *Mycobacterium bovis* (a.k.a., *M. tuberculosis*), *Coxiella* strains, Lysteriosis, Campylobacteriosis, *B anthracis*, *Staphylococcus aureus*, *MRSA*, *Streptococcus* strains, Leptospirosis, Salmonellosis, and norovirus. Johnes Disease is known to exist in Pt. Reyes herds and the same organism (*Mycobacterium avium* s. *paratuberculosis*) has been detected in humans with Crohn's Disease. The transmissible spongiform encephalopathic (TSE) diseases such as Bovine spongiform encephalopathy (BSE) known as Mad Cow disease, Creutzfeldt-Jakob disease (CJD) in humans, and Chronic Wasting Disease in deer and elk, are prion diseases. Research documents transmission of zoonotic diseases by air as well as ingestion and physical contact.

NPS mentions monitoring water polluted by nitrogen and fecal bacteria in coastal watersheds affected by ranching including Olema Creek, Kehoe Creek, Abbotts Lagoon, Home Ranch Creek and Tomales Bay. Yet there are no longterm, in-depth analyses, only various summary reports and a number of annual and biennial snapshots of conditions from the SF Bay Area Network Inventory. Water sampling is from surface sources; underground contamination carried to the sea in subsurface plumes remains undocumented.

Pollution from grazed lands periodically sprayed with manure is augmented by runoff from core and pasture zones where the most intensive ranch uses occur. Leaks, uncorrected maintenance, failures in drainage conduits, pumping plants, manure ponds, water supply at corrals and feeding areas, ranch wastes, bovine afterbirths and carcasses, *all* seep undetected and uncorrected into subsurface waters, moving downward to public recreation areas. Ranchers may try to cull sick cattle, but fecal waste and contaminated soils can carry and shed infectious bacteria for 12-18 months.

CD-0006-20 calls for testing, monitoring and reports, but general protocols and and lack of enforcement rigor do not inspire confidence that pollution and contamination will be corrected. Testing without mandates and defined goals, results in weak performance. When testing is flawed, unreliable data is generated, and bad decisions are made.

Reports that the RWQCB endangers water safety by routinely grant waivers to Pt Reyes ranches, thus enabling non-compliance with pesticide and fecal matter discharge limits are concerning. These charges must be investigated, and the RWQCB is not the agency to undertake such a task. Is the CCC?

The Tomales Point tule elk may be outside this GMPA, but consequences of NPS action there can contaminate coastal waters and should not be ignored. During 2012-2015, up to 50% of the penned Tomales Point tule elk herd died. News reports indicated NPS was unaware of the dieoff as it unfolded. Carcasses were left to rot on the peninsula until the loss was observed and public outcry followed. NPS denies thirst killed the elk, but provided no information on what did. Elk migrate throughout the PRNS and water-borne pollution certainly escapes into coastal waters. Unless every animal in each herd is tested, opportunistic zoonotic diseases cannot be conclusively ruled out: the potential for undetected zoonotic pathogens entering surface and subsurface waters is undeniable. To assert elk management will not affect coastal zone resources errs in fact and also in assessing both public opinion and that "strong public participation" of the CCC's mission statement.

NPS mentions limited forage at Drakes Beach, fence damage and ranch trespass by elk. With approaching drought, elk herds maybe stressed, weakened and more vulnerable to disease, especially herds penned on lands that cannot support burgeoning elk population. Public support for tule elk is undeniable. Yet NPS' GMP Alternative B endorses diversification for ranches, NPS repair of fencing for ranches, and increased intensity of use by the existing ranches instead of increased protections and enhancement for the environment of marine and wildlife. With sea rise from climate change anticipated to be very substantial at the Pt. Reyes National Seashore, the CCC should be proactive and foresighted in opposing NPS politicalization of these public lands. Fencing out the public in favor of continued bovine pollution seems a lamentable choice for federal lands adjacent to a protected California coast line.

The CCC will be considering the programmatic elements of the GMPA at later dates, and would be well-advised to provide early guidance for NPS actions. The selected Amendment B raises serious concerns over the intent of the NPS to use management activities to benefit private interests above public access and enjoyment of PRNS.

Some examples: proposed lease and zoning changes increase ranching and pollution, creating risks to PRNS visitors. Diversification of livestock adds to potential for zoonotic disease transmission; pigs and ruminants such as sheep and goats, are susceptible to many of the bovine pathogens cited earlier. Chicken manure can raise nitrite and nitrate water toxicity, requiring wells be cement-sleeved and hundreds of feet below the surface. Arsenic additives in feed and rodenticides create toxic residues. Row crops, irrigated or dry-farmed, that are grown in soils contaminated by generations of ranch wastes may be unsafe for public consumption.

In summary, when ninety percent of public comments are negative, the direction of public sentiment is clear. I urge the Commission to protect, *not ignore*, water quality, biodiversity, and the environmental welfare of the coastal zone, marine life, and Pt Reyes National Seashore's treasured, unique public lands affected by NPS proposals.

Thank you.

Garril Page

70 Fawn Drive

San Anselmo, CA 94960

Theresa Harlan, [tharlantiger@comcast.net](mailto:tharlantiger@comcast.net)

California Coastal Commissioners

January 6, 2021

I appreciate your staff noting my November 25, 2020 letter in the staff report. I am disappointed with the recommendation of a conditional concurrence. The California Coastal Commission's Environmental Justice Policy did not inform this recommendation. The Point Reyes National Seashore's response to my stakeholder comments is simply restating their duty to share stories, preserve local history and celebrate local heritage. We have nearly 60 years of the National Park's celebration of rancher settler domination over indigenous Coast Miwok people. Land is the issue and the glaring lack of equitable dedication of land to Coast Miwok history and the natural habitat of Point Reyes National Seashore.

My request is for the California Coastal Commission to take the leadership it started with the establishment of its Environmental Justice Policy and recognize the racist bias that exists at Point Reyes National Seashore. *Allow the time (read delay a final decision) to recognize the constraints of an imbedded bias that allows a staff report to consider the Park's General Plan Amendment to be consistent with the Environmental Justice Policy.* The establishment of Point Reyes National Seashore Park was to provide access to all communities, including marginalized communities, to enjoy nature. The intent and history and the divergent turn of the Park is well told, with documentation, in Mark Bartolini's paper "The Taking of Point Reyes: A Case Study of White Privilege in a Time of Disaster", also submitted to the California Coast Commission.

Coast Miwok people survived the occupation of Spain and its pernicious mission system. They survived Mexican and American occupations. The numbers of California indigenous populations dropped from estimated millions down to tens of thousands by the 19th century.

How can California justify the continued tax payer support for a small number of ranchers whose ancestors stole indigenous land? I and my family must drive through cattle ranches to get to our family homeland. Park lands need to be returned to the historical and natural landscape of my mother's ancestors and their indigenous stewardship.

I ask to delay the consistency determination and allow your Environmental Justice Policy to do its work. The National Park Service needs to answer my questions.

- Why is a 100-year-plus dairy ranching history more valuable than a Coast Miwok history of over 10 thousand years?
- When will there be an equitable representation and stewardship of Coast Miwok history, culture, and sacred sites by the NPS?
- What will it take for the NPS to stop fencing off nearly 30,000 acres of public land for private use for a few well-connected dairy ranchers?
- When will the NPS diversify their staff and seek visitors reflective of the diversity of the local San Francisco Bay Area and American population?

Theresa Harlan

**From:** zkmansour@gmail.com <zkmansour@gmail.com>  
**Sent:** Tuesday, January 5, 2021 8:05 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 National Seashore

To the California Coastal Commission:

I am writing to ask you to vote AGAINST the staff-recommended conditional compliance to the Point Reyes General Land Management Plan Amendment (GLMPA), and instead object to the National Park Service consistency determination, as it is not consistent with the California Coastal Management Plan.

This is a national park after all . It ought to protected land but we're allowing ranchers to spread liquified manure on the ground. When it rains, that runs off into the water and turns into algae blooms that chokes off life in the sea – in the Greater Farallones National Marine Sanctuary. Doing that anywhere is inexcusable, but to allow it to occur where it affects migrating whales is not inappropriate . It is also not furthering the mission of the Coastal Commission and violates Article 4 (“protection of the marinée environment, including water quality issues, wetlands protections”).

Please help prevent this plan from going into effect and protect our national seashore. We have an opportunity to make a huge difference!

Kind regards,  
Ziad Mansour

**From:** Tim Vago <tim.vago@yahoo.com>

**Sent:** Tuesday, January 5, 2021 7:02 PM

**To:** Energy@Coastal <EORFC@coastal.ca.gov>

**Subject:** Public Comment on January 2021 Agenda Item Thursday 6b - CD-0006-20 (National Park Service, Marin County)

Dear California Coastal Commission:

We are submitting our objection to the National Park Service's plan to cull Tule Elk in the Point Reyes National Seashore. What if bison in Yellowstone National Park were culled so that dairy and beef cattle would have sufficient grazing lands in that National Park? It would be an outrage, and this situation is similarly outrageous for our indigenous Tule Elk.

Furthermore, we want to point out that the Commission should not be forced to make a decision by January 20 when the Commission requested an extension to March 2021. It is no coincidence that the January 20 deadline corresponds with the departing Trump Administration which prioritizes the interests of its donor constituency above those of the State of California. The National Park Service under the new Biden Administration may have a different plan for the Point Reyes National Seashore more in line with the overall interests of the State of California rather than a small group that will reap the economic benefit of the current NPS recommendation. At a minimum, the California Coastal Commission should postpone taking action on this matter until the March 2021 meeting at the earliest. California does not have an obligation to make a rushed decision for the outgoing Trump Administration and should take the proper time for consideration of the best course of action for State of California in this matter.

Thanks and regards,

Timothy Vago

Jill Alexander

1255 Trumpeter Place

San Jose, CA 95131



**From:** Martha Jarocki <marthajarocki@gmail.com>

**Sent:** Tuesday, January 5, 2021 4:24 PM

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

**Subject:** Comments on Point Reyes Management Plan

Dear CA Coastal Commission:

I urge the CCC to deny a consistency determination to the Final Management Plan, the EIS and related documents related to management of the Point Reyes National Seashore.

The plan does not adequately identify or establish a plan to protect stream-side environmentally sensitive areas in which grazing activities may impact salmonids.

The plan does not analyze the adverse impacts of ranching diversification on sensitive species: likely increased populations of ravens will impact Snowy Plover and other ground nesting birds

and the failure to restrict harvesting and mowing during nesting season will also impact avian species.

Water impacts of ranching diversification are also unspecified.

The impact of limiting Tule Elk and confining them to certain areas seems to be designed to protect a few specific ranches. Tule Elk and other wildlife should be provided with a corridor for movement.

The management plan is inadequate to protect wildlife and habitat in this most important seashore.

Instead the plan seems bent on protecting ranching for a few families.

I urge you to insist that the Point Reyes Management Plan adequately address the ongoing impacts of ranching in the seashore and manage this important resource for the public.

Thank you.

Martha Jarocki

129 Greenbrae Boardwalk

Greenbrae, CA 94904

**From:** Sheryl Owyang <sherylrowyang@yahoo.com>  
**Sent:** Tuesday, January 5, 2021 4:06 PM  
**To:** Coastal Point Reyes Management Plan <PointReyesManagementPlan@coastal.ca.gov>  
**Cc:** Sheryl Owyang <sherylrowyang@yahoo.com>  
**Subject:** VOTE NO on Conditional Compliance to Point Reyes GLMPA

Dear Commissioners,

I read the recently published California coastal commission staff recommendations regarding the Point Reyes General Land Management Plan Amendment and *I strongly disagree*. And I am writing to ask you to vote AGAINST the staff-recommended conditional compliance to the GLMPA, and instead object to the National Park Service consistency determination, as it is NOT consistent with the California Coastal Management Plan.

There is a lot of local public concern. The CCC received over *20,000 comments from the public*. Many commenters including myself live in the Bay Area. I live in San Francisco, just 26 miles away from the national park. Most of the feedback *opposed the park's plan to continue commercial cattle operations*. Many of the comments contained relevant scientific and technical data that will take longer to analyze than just a few weeks. And, more information is still being collected and submitted. Yet the staff report that just came out a few weeks ago ignores those concerns, and the commission is planning to hastily vote on this matter on January 14th. **Why the rush?**

The CCC staff had requested until March 2021 to analyze information before issuing the report, but was denied by the National Park Service. Why the rush to sign longterm 20 year leases that most of the public opposes? NPS asked that the vote happen in January— denying adequate time for a proper assessment of their plan. And it is no coincidence that the vote will happen just a week before the current administration leaves office. **Please do not succumb to political pressure from the NPS and Big AG.**

Additionally and perhaps even more importantly, the *staff report lacked sufficient data* on other spillover effects from the Point Reyes GLMPA. For example, nothing about water quantity was addressed in the entire Point Reyes National Seashore portion of the planning area. Climate impacts from cattle was not addressed. What about effects on migratory birds, eelgrass, orcas, and endangered salmon? As a scientist and veterinarian, I have no doubt that properly conducted environmental impact studies will confirm unacceptable deleterious effects of commercial cattle operations. When making a decision that will impact the California Coast for the next several decades, it is imperative to have all the relevant information, and enough time to analyze that information.

**Please vote against the conditional compliance on January 14th.**

Sincerely,

Sheryl Owyang

Veterinarian

San Francisco

**From:** Lonna Richmond <lonnajeau@gmail.com>

**Sent:** Tuesday, January 5, 2021 3:58 PM

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

**Cc:** Craig\_Kenkel@nps.gov; Weber, John@Coastal <john.weber@coastal.ca.gov>

**Subject:** NPS compliance with CCA

Dear Commissioners,

I came across this in researching for the upcoming hearing you will have regarding PRNS.

### 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 water flow, encouraging waste water reclamation, maintaining natural vegetation buffer areas that protect riparian habitats, and minimizing alteration of natural streams

I respectfully submit to you that you must reject the NPS because they appear to have done nothing in regards to the above requirements as it pertains to water quality. First off, they haven't done testing since 2013 and they didn't even mention water quality in their EIS. I have been reading about eelgrass and seagrass from a report the Nature Conservancy ([http://www.pacificfishhabitat.org/wp-content/uploads/2017/09/EelGrass\\_Report\\_Final\\_ForPrint\\_web.pdf](http://www.pacificfishhabitat.org/wp-content/uploads/2017/09/EelGrass_Report_Final_ForPrint_web.pdf))

In California, eelgrass impact and mitigation guidance is primarily structured within the California Eelgrass Mitigation Policy (CEMP) (Region 2014). Several California state agencies use the CEMP framework to establish standards and guidelines for eelgrass management. NOAA Fisheries adopted the CEMP and implementing guidelines, including the goal of “no net loss” of eelgrass habitats in California (Gilkerson and Merkel 2014). The CEMP guidelines and standards also include creating or restoring 20 percent more eelgrass habitat than was previously eliminated as part of mitigation efforts. Prior to the adoption of the CEMP, the Southern CEMP (1991) helped ensure eelgrass impacts were mitigated in most circumstances in Southern and Central California (Region 2014). Despite various levels of protection within the waters of U.S. West Coast states, eelgrass systems and the ecosystem services they provide are threatened by numerous human activities, such as land runoff and **eutrophication**, dredging, boat grounding and anchoring, introduction of non-native species, construction of overwater structures, and aquaculture (Duarte 2002; Thom et al. 2011; Cullen-Unsworth and Unsworth 2013). Eelgrass grows in a narrow depth range, thus global climate change and associated sea level rise is predicted to negatively influence eelgrass habitats (Orth et al. 2006).” (p. 2)

May I point out that eelgrass and seagrass are of utmost importance to fish habitat. Sedimentation from runoff and eutrophication are the two worst threats to eelgrass on our coast. The dairy and ranching businesses and all the feces and urine associated with it, plus NPS bringing in more non-native species, will only add insult to injury when it comes to water quality. This has been true all along, yet for some reason, waivers have been issued and NPS continues to foul up our PRNS.

Please let's put an end to this once and for all. Let the land restore itself by stopping these businesses now. Forget local beef and dairy. There is enough of it in West Marin and the PRNS only contributes a small amount. The elk can help restore the beautiful coastal prairie that has been trampled and covered over by cow-pies. Please don't let this abomination continue. Our park is our land, and it is up to you to speak out against anything that gets in the way of doing the right thing.

Sincerely,  
Lonna Richmond

**From:** Veronica G <thevern@gmail.com>

**Sent:** Tuesday, January 5, 2021 3:57 PM

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

**Cc:** Weber, John@Coastal <john.weber@coastal.ca.gov>; Craig\_Kenkel@nps.gov

**Subject:** REJECT expanded ranching in Point Reyes

Hello,

My name is Veronica Geczi and I am a Bay Area local who enjoys visiting and hiking our parks. I am very disturbed by the current standings of the Tule Elk in Point Reyes. I am well aware of the effects on the Tule Elk caused by the gargantuan fencing on behalf of private cattle ranchers in the area, preventing Tule Elk from reaching vital water resources. The water available within the fence is scarce and non-existent; the natural water sources they would usually be able to get are inaccessible due to the fencing. "Natural" die-off is impossible when you have a species locked in an area you know does not have enough sources of water and food; call it what it is - purposeful eradication and extinction of a native species and destruction of native habitats.

This is public land and the priority should be in keeping it as healthy, clean, and bio diverse as possible. That is the cornerstone of the NPS. The fact that there is any private leasing for animal agriculture on this land is deplorable and clearly shows corruption in the governing agencies and political figures. The current standing where Tule Elk are suffering from thirst and perishing is completely unacceptable.

The effects of the animal agriculture in Point Reyes have led to toxic, anaerobic conditions in water bodies in the area, and is contributing to air pollution at an aggressive rate. It is quickly killing the diverse, unique, and important native grasses and plant life. This is fact. It is simply not sustainable and a complete misuse of our public lands. We should be phasing out cattle from the area, not bending over backwards to accommodate cruel practices at the expense of native wildlife and plant life.

PLEASE, I urge your team to be on the right side of history and stop perpetuating this cruelty and corruption. Please reject the conditional compliance of expanded ranching in Point Reyes.

Regards,

Veronica Geczi

194 Arlington Ave

Kensington, CA 94707

510-926-8769

**From:** Jettie Word <Jettie@borneoproject.org>

**Sent:** Tuesday, January 5, 2021 11:45 AM

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

**Subject:** comment on management plan for Point Reyes National Seashore

Hello,

I am asking that the California Coastal Commission NOT fast-track the National Park Service's management plan for Point Reyes National Seashore, which is obviously beyond flawed. A "management plan" expands livestock grazing and includes culling the elk population in the park does not come close to meeting acceptable levels of conservation that should be upheld in our national parks, not to mention coastal protection in this national seashore — the country's first.

Best,

Jettie

--

***Jettie Word***

*Pronouns: She/her*

Director, The Borneo Project

Phone: 1.505.250.3843

Skype: jettie.word

[www.BorneoProject.org](http://www.BorneoProject.org)

**From:** Sidney Dent <mouselib@prodigy.net>

**Sent:** Tuesday, January 5, 2021 11:13 AM

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

**Subject:** 1-5-2021 Comment prior ro Coastal Commission meeting.

Please do not approve the plan for more ranching and killing the native Tule Elk at PointReyes National Seashore.

The historic ranches are no longer. Instead the NPS had allowed near factory farming buildings and rampant fecal pollution on this public land. Their policy to deny water to the trapped herds on Tomales Point is an example of heartlessness.

Why has the NPS has allowed the Tule Elk to die without water again? This is totally against its charter of conservation. The officials of the park should be replaced by staff who are interested in protecting the environment and do not work in the interests of the ranchers.

Thank you, Sidney Dent

66 Main Street, San Quentin, CA 94964

415 460 1234

**From:** MARY FITZPATRICK <jinmary@comcast.net>

**Sent:** Tuesday, January 5, 2021 5:16 AM

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

**Subject:** In Opposition to Alternative B

On January 14, 2021, the California Coastal Commission will evaluate the National Park Service (NPS) proposal for management of Point Reyes National Seashore ranch leases for consistency with the Commission's mission and values. I believe the NPS Management Plan for ranching within the National Seashore, "Alternative B," is inconsistent with the Commission's mission and values as stated in the California Coastal Commission 2021 Strategic Plan. The Management Plan prioritizes the ranching business over protection of the very natural systems that make Point Reyes unique and worthy of protection in the National Park System.

Point Reyes National Seashore management has a difficult balancing act: It must balance the needs of millions of urban and suburban Bay Area dwellers to escape to wild natural spaces and the need to keep those places wild. Science has revealed the fragility of the web of interdependent relationships in an ecosystem, and so human activity must be carefully regulated within protected areas and national parks. It is generally recognized that businesses within national parks should exist there only to allow visitors to stay and enjoy what the park offers. Understanding this, the National Park Service shut down the Drake's Bay Oyster Company in 2014, prioritizing the life of the estero ecosystem over that of business. Yet it has allowed privately run ranches to operate within the park since the park was formed, although these ranches do not directly benefit park visitors.

Alternative B will allow ranch operations at Point Reyes to increase: In addition to cattle, ranches will be able to dry-farm crops, keep goats, sheep, and chickens and may board horses and offer new guest accommodations. This will impact ecosystems in surrounding lands in various ways. More water will be drawn from streams that are home to coho, Chinook, and steelhead in an era when climate change has made drought more likely. More runoff from animal excrement, fertilizers, and other agricultural chemicals along with continuing silage production will find its way into streams. Wildlife may be attracted to the ranch sites, leading to unfavorable outcomes for them. Elk are already in competition with ranch cattle for grazing land, and Alternative B means that the NPS will try to relocate and cull an elk herd.

The California Coastal Commission is committed to decision making grounded in objective science, and so it should be very concerned that the NPS is moving forward with Alternative B without sufficient data: Streams and wetlands have not been evaluated as Environmentally Sensitive Habitat Areas, and the quantity of additional water to be drawn from streams and the consequent impact on fish in those streams under Alternative B is unknown. Also unknown is what crops would be grown and what equipment would be used with them, what wildlife inhabits the proposed crop lands, and what impacts tilling, planting, and harvesting would have on this wildlife. In the face of this uncertainty about the environmental impacts of Alternative B, the

Coastal Commission must follow the precautionary principle and require further data collection and analysis before a new plan is implemented.

If ranching is to continue within Point Reyes National Seashore, the NPS Management Plan must detail a robust schedule of monitoring and meaningful enforcement fully funded for the lifetime of the Plan. Most importantly, NPS monitors should be able to enter ranch land at any time to monitor water, herd numbers, farm animal-wildlife-human interactions, structures, and crops. NPS monitors would need to check for pollutants regularly at each ranch site; evaluate endangered fish and frogs in impacted streams; and make sure that tilling, planting, and harvesting do not impact nesting birds and other wildlife. The Management Plan would need to specify penalties for lease violations including excess water use or pollution; harming of predatory wildlife; and violation of rules governing herd numbers and crop management. The Plan should give the NPS the right to mandate changes in ranch operations and impose penalties for violations, including fines; bans on silage production; water shut-offs; and lease terminations. While some might think that effective monitoring and enforcement have too high a price, in the long view, thriving ecosystems protected indefinitely have value that is beyond monetary.

It has been argued that the ranches at Point Reyes must be preserved because they are “historic”. Indeed, the NPS is committed to honoring the human history of park lands and the cultural heritage of their inhabitants and educating the public about the past. However, the ranches at Point Reyes today do not maintain historical ranching methods, and although the original ranches were dairies, most of the ranches now produce beef cattle. The Point Reyes ranches today do not serve to educate the public about the ranching history; in fact, they are seldom, if ever, open to the public. These “historic” ranches are simply private businesses that allow descendants of the original ranching families to live on leased public land and make a living off of it.

Like the NPS, the California Coastal Commission seeks to protect cultural resources in coastal California, and today it is necessary to ask anew how those resources are being managed. Over the past year, there have been increasing calls for racial justice, bringing about a reckoning with institutional racism at all levels. Clearly, the Coast Miwok inhabited Point Reyes for a far longer span of history than the dairy ranchers, so it is appropriate that the Point Reyes National Seashore honor Miwok culture and tell the Miwok story in the Visitor’s Center and at Kule Loklo. Yet the NPS and the Commission would probably agree that it would not be appropriate to allow the descendants of Coast Miwok inhabitants to live in the park and run private businesses that do not serve the public, as the descendants of dairy ranchers are allowed to do. It is time to look at its allotment of resources to these two groups in a new light.

There is something even more alarming about Alternative B than its scant requirements for scientific data, insufficient planning and funding of monitoring and enforcement, and favoring of one group with historical ties over another: The Plan can make ranching at Point Reyes permanent—this in a time of climate change and evolving scientific understanding of the human



impacts on natural systems. Heretofore, a rancher at Point Reyes has been allowed to pass a ranch on only to a direct descendent. Under Alternative B, a ranch could be transferred to a neighbor or to anyone who wishes to operate it. This makes it unlikely that ranch lands would ever return to a natural state.

The future of Point Reyes is at stake. The California Coastal Commission should elicit citizen participation in this important decision about the NPS Management Plan. In particular, the Commission should hear from scientists who specialize in the ecosystems in question and from the Coast Miwok, who, like the ranchers, have a cultural and familial heritage rooted in Point Reyes.

From: mamasi@everyactioncustom.com <mamasi@everyactioncustom.com>  
Sent: Monday, January 4, 2021 1:20 PM  
To: Coastal Point Reyes Management Plan <PointReyesManagementPlan@coastal.ca.gov>  
Subject: 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.

Sincerely,  
Ms. Melody Masi  
33 Spruce St West Barnstable, MA 02668-1505 [mamasi@comcast.net](mailto:mamasi@comcast.net)

**From:** MARY FITZPATRICK <jinmary@comcast.net>

**Sent:** Tuesday, January 5, 2021 5:16 AM

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

**Subject:** In Opposition to Alternative B

On January 14, 2021, the California Coastal Commission will evaluate the National Park Service (NPS) proposal for management of Point Reyes National Seashore ranch leases for consistency with the Commission's mission and values. I believe the NPS Management Plan for ranching within the National Seashore, "Alternative B," is inconsistent with the Commission's mission and values as stated in the California Coastal Commission 2021 Strategic Plan. The Management Plan prioritizes the ranching business over protection of the very natural systems that make Point Reyes unique and worthy of protection in the National Park System.

Point Reyes National Seashore management has a difficult balancing act: It must balance the needs of millions of urban and suburban Bay Area dwellers to escape to wild natural spaces and the need to keep those places wild. Science has revealed the fragility of the web of interdependent relationships in an ecosystem, and so human activity must be carefully regulated within protected areas and national parks. It is generally recognized that businesses within national parks should exist there only to allow visitors to stay and enjoy what the park offers. Understanding this, the National Park Service shut down the Drake's Bay Oyster Company in 2014, prioritizing the life of the estero ecosystem over that of business. Yet it has allowed privately run ranches to operate within the park since the park was formed, although these ranches do not directly benefit park visitors.

Alternative B will allow ranch operations at Point Reyes to increase: In addition to cattle, ranches will be able to dry-farm crops, keep goats, sheep, and chickens and may board horses and offer new guest accommodations. This will impact ecosystems in surrounding lands in various ways. More water will be drawn from streams that are home to coho, Chinook, and steelhead in an era when climate change has made drought more likely. More runoff from animal excrement, fertilizers, and other agricultural chemicals along with continuing silage production will find its way into streams. Wildlife may be attracted to the ranch sites, leading to unfavorable outcomes for them. Elk are already in competition with ranch cattle for grazing land, and Alternative B means that the NPS will try to relocate and cull an elk herd.

The California Coastal Commission is committed to decision making grounded in objective science, and so it should be very concerned that the NPS is moving forward with Alternative B without sufficient data: Streams and wetlands have not been evaluated as Environmentally Sensitive Habitat Areas, and the quantity of additional water to be drawn from streams and the consequent impact on fish in those streams under Alternative B is unknown. Also unknown is what crops would be grown and what equipment would be used with them, what wildlife inhabits the proposed crop lands, and what impacts tilling, planting, and harvesting would have on this wildlife. In the face of this uncertainty about the environmental impacts of Alternative B, the

January 4, 2021

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

RE: Pt Reyes National Seashore Coastal Consistency Determination  
Commission Hearing January 14, 2021

**Agenda Item Th6b**

Dear Commissioners,

I request that the Commission not fast-track concurrence with the National Park Service (NPS) Consistency Determination for the Point Reyes National Seashore General Management Plan Amendment. As your staff pointed out there are significant spillover effects from the proposed Plan Amendment that deserve further evaluation. Water quality noncompliance has been a legacy issue on and adjacent to these lands and deserves far more evaluation before the Commission can make a consistency determination. The NPS fast-track schedule is politically driven, is neither in the public's interest nor in the interests of the Commission.

The National Park Service's Plan Amendment fails the public. NPS received 7,627 comments on their Plan/EIS, with 6,969 of those comments expressing opposition to continued ranching and dairying at the current levels (91%). Only 2.3% of the commenting public support the NPS Plan B. NPS has left unsettled numerous public concerns regarding coastal access, water supply, water quality, species protections, marine pollution, climate impacts and coastal infrastructure.

The Commission's staff determined there are significant spillover impacts from the proposed Plan, including water quality and marine resources. These impacts are chronic and have been allowed by NPS for decades. Water quality data falls woefully short of standard practices and is especially egregious on a National Seashore. The California Coastal Act gives the authority of the Commission to exercise consistency determination concerning water quality laws (state and federal) and I ask that you exercise that responsibility to the fullest extent. I ask this because the NPS has consistently failed to monitor water quality conditions and to my knowledge never taken enforcement actions to remedy the chronic non-compliance.

The NPS Consistency Determination does not provide adequate evaluation of the over-flow impacts on public access in the Coastal Zone. PRNS was purchased by the public with a clearly stated goal of public access, yet the "leaselands" have privatized over 21,000 acres of the Seashore. Public access to these Seashore lands was written into the leases, yet the public has been fenced out of practically all this land. The spill-over is more parking and access demands on the state's coastal resources as well as further intensification of public access on the rest of the PRNS.

The lease lands are treated as private property, though we the public paid full market value (\$370 million in today's dollars) to purchase these farms and ranches for the benefit of public use and enjoyment. The NPS Consistency Determination failed to address the intent (to end private commercial uses on our National Seashore) of the enabling law, and (to then) evaluate the public exclusions the proposed Plan Amendment would extend. There are spill-over impacts on the state's coastal resources.

The staff report cites the Joint Explanatory Statement in HR 116-9 of 2019, an attachment to the 2019 Appropriations Bill, stating support for 20 year lease extensions. The "statement" had no public input, no substantive review or connection to the law. This should carry no agency for the Commission.

NPS and Commission staff make numerous statements about the proposed GMPA protecting historic and cultural resources "of significance." Please note that the percentage of visitors to the Seashore that are drawn by these particular resources is minuscule, an estimated 5%. California has over 5 million cows on public lands, including up and down our coastline. The Seashore is not the place to over-protect an already "cultural resource."

The assertion that we have healthy and sustainable agriculture on Pt Reyes is not backed by science. The assertion that there are no spillover resource effects because of agriculture lacks merit. The science tells us, specific to Pt Reyes and especially to the selected Plan: ranching and dairying are contributors to climate degradation; water quality pollution; water supply degradation; marine mammal impacts; endangered and threatened species declines and habitat losses; potential species extirpation; nominal economic contributions to local and regional communities; cultural and historical resources of relatively low interest; and questionable economic sustainability. Each of these issues carry spill-over considerations for the Commission.

The NPS proposed Plan Amendment fails the public interest test for the reasons stated above. I ask the Commission to refrain from further failing the public. Provide staff and the public the opportunity for better planning and review of the potential impacts to our coastal resources. The staff recommendation for the March 2021 schedule is reasonable, prudent and in the public interest.

Sincerely,



Daniel D. Heagerty  
539 Northern Ave  
Mill Valley, CA 94941

[ddheagerty@gmail.com](mailto:ddheagerty@gmail.com)

Copies:

Pt Reyes National Seashore Superintendent Kenkel  
Governor Gavin Newsom  
Representative Jared Huffman  
U.S. House of Representatives Natural Resources Committee

Coastal Commission must follow the precautionary principle and require further data collection and analysis before a new plan is implemented.

If ranching is to continue within Point Reyes National Seashore, the NPS Management Plan must detail a robust schedule of monitoring and meaningful enforcement fully funded for the lifetime of the Plan. Most importantly, NPS monitors should be able to enter ranch land at any time to monitor water, herd numbers, farm animal-wildlife-human interactions, structures, and crops. NPS monitors would need to check for pollutants regularly at each ranch site; evaluate endangered fish and frogs in impacted streams; and make sure that tilling, planting, and harvesting do not impact nesting birds and other wildlife. The Management Plan would need to specify penalties for lease violations including excess water use or pollution; harming of predatory wildlife; and violation of rules governing herd numbers and crop management. The Plan should give the NPS the right to mandate changes in ranch operations and impose penalties for violations, including fines; bans on silage production; water shut-offs; and lease terminations. While some might think that effective monitoring and enforcement have too high a price, in the long view, thriving ecosystems protected indefinitely have value that is beyond monetary.

It has been argued that the ranches at Point Reyes must be preserved because they are “historic”. Indeed, the NPS is committed to honoring the human history of park lands and the cultural heritage of their inhabitants and educating the public about the past. However, the ranches at Point Reyes today do not maintain historical ranching methods, and although the original ranches were dairies, most of the ranches now produce beef cattle. The Point Reyes ranches today do not serve to educate the public about the ranching history; in fact, they are seldom, if ever, open to the public. These “historic” ranches are simply private businesses that allow descendants of the original ranching families to live on leased public land and make a living off of it.

Like the NPS, the California Coastal Commission seeks to protect cultural resources in coastal California, and today it is necessary to ask anew how those resources are being managed. Over the past year, there have been increasing calls for racial justice, bringing about a reckoning with institutional racism at all levels. Clearly, the Coast Miwok inhabited Point Reyes for a far longer span of history than the dairy ranchers, so it is appropriate that the Point Reyes National Seashore honor Miwok culture and tell the Miwok story in the Visitor’s Center and at Kule Loklo. Yet the NPS and the Commission would probably agree that it would not be appropriate to allow the descendants of Coast Miwok inhabitants to live in the park and run private businesses that do not serve the public, as the descendants of dairy ranchers are allowed to do. It is time to look at its allotment of resources to these two groups in a new light.

There is something even more alarming about Alternative B than its scant requirements for scientific data, insufficient planning and funding of monitoring and enforcement, and favoring of one group with historical ties over another: The Plan can make ranching at Point Reyes permanent—this in a time of climate change and evolving scientific understanding of the human

impacts on natural systems. Heretofore, a rancher at Point Reyes has been allowed to pass a ranch on only to a direct descendent. Under Alternative B, a ranch could be transferred to a neighbor or to anyone who wishes to operate it. This makes it unlikely that ranch lands would ever return to a natural state.

The future of Point Reyes is at stake. The California Coastal Commission should elicit citizen participation in this important decision about the NPS Management Plan. In particular, the Commission should hear from scientists who specialize in the ecosystems in question and from the Coast Miwok, who, like the ranchers, have a cultural and familial heritage rooted in Point Reyes.

**From:** Juan Jose Arteaga <j.j.arteaga58@gmail.com>  
**Sent:** Monday, January 4, 2021 6:32 PM  
**To:** Coastal Point Reyes Management Plan <PointReyesManagementPlan@coastal.ca.gov>  
**Cc:** nrdems@mail.house.gov; Craig\_kenkel@nps.gov  
**Subject:** Point Reyes

To whom it may concern,

I'm writing this letter in regards to the General Management Plan Amendment drafted by the NPS at Point Reyes Seashore because I find it outrageously wrong that a place with such a wide wildlife diversity (and one of the last in the California coastline) be destined to ranching. This action shows nothing but a shameful lack of commitment to the environment, the community and the future generations. Granting permission to a few private businesses to destroy one of the most beautiful places of the western coastline is beyond shameless and obviously not in sync with the demands of the 21st century in terms of protecting places with high biodiversity.

It will be a shame for California to allow the National Park Service put their Plan Amendment into effect since it goes against the urge for preserving our natural environment. It is a scientific fact that ranching contributes to the loss of topsoil, contamination of waterways, destruction of native flora and fauna, and that it exacerbates climate warming.

I am optimistic that the Commission will consider this responsibility very seriously and that the common sense will prevail when making a decision, for the wellbeing of not a few businesses but for that of millions of Californians who deserve to enjoy this part of the State for the years to come.

In the hope of a positive response to this matter, I remain.

Yours truly,

Juan Arteaga



**From:** [rscimino@gmail.com](mailto:rscimino@gmail.com) <[rscimino@gmail.com](mailto:rscimino@gmail.com)>

**Sent:** Monday, January 4, 2021 12:54 PM

**To:** Weber, John@Coastal <[john.weber@coastal.ca.gov](mailto:john.weber@coastal.ca.gov)>; [pointreyesmanagement-plan@coastal.ca.gov](mailto:pointreyesmanagement-plan@coastal.ca.gov)  
<[pointreyesmanagement-plan@coastal.ca.gov](mailto:pointreyesmanagement-plan@coastal.ca.gov)>

**Cc:** [rscimino@gmail.com](mailto:rscimino@gmail.com) <[rscimino@gmail.com](mailto:rscimino@gmail.com)>

**Subject:** Point Reyes Planning more time is needed to understand negative impacts

**Dear John Weber,**

**Happy New Year and wishing you good health too.**

**The National Park Service is doing their absolute best to fast-track the Point Reyes Management Plan. I find this a dump and bullying tactic.**

**The National Park Service wants to jam a final decision of their poor planning process down our throats with an Artificial Deadline for approval of January 14, 2021.**

**Their total disregard to the input from California citizens and requirements that the California Coastal Commission (CCC) needs to consider for effective management is an embarrassment to consensus building.**

**As a participating citizen, having viewed the National Park planning process, I am disgusted with their cavalier attitude toward established California law.**

**For 50 years our California Coastal Commission has been managing the coastal resources with total achievement within the spirit of the law as intended by Proposition 20.**

**I attended the park service's public meetings and have written letters and emails which appear to have been disregarded.**

**The concerned citizens and the CCC need time to understand increased row crop farming, along with an increased livestock numbers with impacts on wildlife in the CCC management zone as well as non-studied eel grass habitat, plus water, air and beach water pollution.**

**My REQUEST and HOPE is that CCC management and staff will deny approval on January 14<sup>th</sup> and allow time for study and report back to the public.**

**The CCC has had many ferocious foes with relentless attacks over the years. it is time to push back on the park service, roll up your sleeves and fight to save the integrity of the CCC principles.**

**With Appreciation,**

**Rich Cimino**

**Greenbrae Cal.**

Dear California Coastal Commission members,

January 4, 2021

I am writing to ask you to vote AGAINST the staff-recommended conditional compliance to the Point Reyes General Land Management Plan Amendment (GLMPA), and instead object to the National Park Service consistency determination, as it is not consistent with the California Coastal Management Plan. Saving the Point Reyes National Seashore Park from commercialization and pollution is imperative, I urge you to review State Water Resources Control Board studies regarding e-coli pollution of the beaches and streams of Pt. Reyes National Park.

It seems obvious that the Trump Administration would like to privatize and allow for more cattle grazing on our wild and public lands set aside to remain intact for the enjoyment of future generations. I am a local resident of West Marin having moved here years ago to be closer to the natural environment that I love. I take pride in the National Park System, but I am concerned about the damage currently being done by ranching and dairying that increasingly is putting at risk the native plants and animals that live in the National Seashore Park. The Park is the original home of the now threatened Tule elk, who were reintroduced by the National Park Service (NPS) but now seems to be expendable as annual culling is being considered. The NPS is supposed to supervise the ranches by granting leases in a manner that does not impair the natural resources of the seashore, preserves and protects the wildlife for future generations. Early last year, a local rancher visited the White House to lobby President Trump to intervene in order to gain sympathy for granting 20 year leases to the dairies and ranches and to allow for the possible expansion into other commercial projects.

Last summer the NPS opened a comment period to allow for the public to weigh in on how the Seashore/park should be managed in the future. Over 7600 citizens responded, over 90% of them supported the phasing out of the ranches with no culling of the Tule elk that has been proposed in the NPS preferred plan. Yet, the NPS proposes extending the privately owned ranch leases to a much longer than usual (5-10 years) terms of 20 years, even allowing for expansion of ranching activities including adding more farm animals, growing commercial crops and maybe even B & B's and farm stays for tourists

The Seashore Park was created in 1962, a multimillion dollar buyout of the ranches was funded by the taxpayers and leases were signed set to expire in 1987. But instead of moving their operations to private lands, the NPS has extended the leases allowing the ranching and dairying to continue with reduced grazing fees and much of the needed repairs to the ranches done by the NPS. Over the years, wildlife has been impacted by barbed wire fences, culling of predators, silage mowing (killing of endangered Snowy plover) fencing of Tule elk that resulted in over 200 of them dying of thirst in 2004. Thousands of elk once roamed the hills and prairies until they were hunted almost to extinction. Under the NPS favored management plan the elk could be periodically culled to keep them from damaging fences or eating the "grasses intended for the cattle."

The ranchers and their friends claim that cattle ranching and dairying is sustainable and even beneficial to the ranch/park lands. This could not be farther from the truth. Last summer I visited one of the dairy ranches on a back road. I saw how the ranchers deal with the huge amount of

manure generated by the cattle. The poop is stored in ponds which is later sprayed on the land thus inundating the creeks, marshes and other bodies of water that eventually empty into Tomales Bay and the Pacific Ocean. The State Water Resources Control Board reports that the waters of Point Reyes teem with e-coli and ranked as one of the most polluted even making some of the beaches unsafe for swimming. There is concern that maturing salmon that rely on Tomales Bay for maturation (before migrating to the Ocean) will be adversely affected by the pollution.

The idea that cattle grazing is a way to sequester carbon is a myth. The reality is that heavy cattle grazing (there are 6000 cattle grazing on the Pt. Reyes peninsula and the GGNR area) are doing the opposite. Scientific studies show that the native perennial bunch grasses and native shrubs like coyote bush with their extensive root systems are much better at storing carbon than annual grasses and the radish and mustard planted and harvested by the ranchers to feed the cattle. Annual grasses have shallow, sparse roots and give up their carbon as they decompose. What the ranchers tout as carbon farming seems to consist of collecting manure, liquefying it in ponds and then trucking and spraying this liquefied poop onto cow pastures and silage fields. Winter storms wash the manure into the watershed resulting in fecal coliform contamination. True carbon sequestration would be to allow the native grasses and shrubs to return but heavy cattle grazing prevents this from happening.

Methane emissions that come from the large number of cows along with rotting annual grasses and silage make the Point Reyes National Park a shameful contributor to greenhouse gasses. According to the United Nations, reducing methane omissions from cows could be one of the quickest way to slow climate change. California has 1.8 million dairy cows that produce methane gas. Methane traps 84 times as much heat as CO<sub>2</sub>.

In 1978, the original legislation was amended to require that the NPS manage ranch leases in a manner that does not impair the natural resources and wildlife at the seashore. Instead we find piles of manure, eroded stream banks, poor quality ranges and a lack of true carbon sequestration. The NPS has failed and instead is supporting the ranchers by allowing for further degradation and commodification of our park land and further persecution of the Tule elk. By law the NPS is mandated to manage all national parks in a manner which provides maximum protections, restoration and preservation of the natural environment for generations to come.

Marin and Sonoma counties and California in general have plenty of private meat and dairy sources, using national park lands for this purpose is untenable. I encourage the NPS to find a way for the ranches to be phased out as was originally intended. Our seashore park was originally created to provide refuge for wildlife, restore habitats for threatened and endangered species, provide educational opportunities and sustain cultural traditions of native peoples it was not meant to encourage commercial agriculture.

Dale Sorensen

PO Box 316

Inverness CA 94937

From: Signe Swenson <signeswenson@icloud.com>  
Sent: Monday, January 4, 2021 11:48 AM  
To: Coastal Point Reyes Management Plan <PointReyesManagementPlan@coastal.ca.gov>  
Cc: nrdems@mail.house.gov; Craig\_kenkel@nps.gov  
Subject: Cattle

To Point Reyes Management Members,

As a long time, and frequent visitor to Point Reyes National Seashore, I have become increasingly concerned about the damage which the ever increasing cattle are doing to our public lands. Not only are the intrusive elk fences an eyesore, the condition of the hillsides and ponds is deplorable. The water at the beaches is no longer clear, but running with cow excrement, and I am concerned about the health of the entire ecosystem which would necessarily include the offshore fisheries. The native elk are in peril, because they cannot get to water. I thought that the cattle usage was to be eased out over a several year period, but it would seem to me that there are more cattle every time I visit the seashore.

I am asking that you delay making any lasting decision until studies can be made on the effect of the cattle on our public lands and water. It doesn't quite seem like a "NATIONAL SEASHORE" anymore, but more like an extensive cattle ranch.

Please do the right thing to preserve our national, and treasured coastal lands.

Signe Swenson  
[signeswenson@icloud.com](mailto:signeswenson@icloud.com)

From: Louisa Jaskulski <louisamj@gmail.com>

Sent: Monday, January 4, 2021 10:24 AM

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

Subject: Re: January Meeting Agenda Item 6b

Commissioners,

PT. REYES TULE ELK. AN AMAZING ICONIC ANIMAL FOUND NOWHERE ELSE, ARE AT EXPERIENCING UNSUPPORTABLE DECIMATION IN ORDER TO PROVIDE TAX PAYER WELFARE TO MEAT AND DIARY COWS. Tule Elk are native wildlife that belong on PUBLIC lands. People come from all over the country to observe them and wonder at their elegance (myself included). They are part of OUR PUBLIC history and heritage. Cows are not. - cattle/dairy are there to provide private profit to a few owners - yet they are allowed to deprive the elk of essential water and foliage. This is cruel and outrageous.

PLEASE find the NPS Consistency Determination for the General Management Plan Amendment/Final Environmental Impact Statement (GMPA/EIS) for Point Reyes National Seashore and the north district of Golden Gate National Recreation Area NOT consistent with the California Coastal Management Program.

This plan is NOT consistent to the maximum extent practicable with the California Coastal Management Plan for many reasons. It would allow significantly new development, uses and activities on national parkland which would irreversibly and negatively impact the nearby coastal zone resources and public enjoyment of the coastal zone. For example, the expanded and new agricultural uses and intensity would heighten the already troubling impacts to water quality in nearby streams, further threatening endangered salmonids in the area.

This plan would also treat native tule elk as problem animals to be killed or hazed, while authorizing additional and expanded agriculture uses which are certain to cause further conflicts between ranching operations and native wildlife. Native tule elk were brought back from the brink of extinction and Point Reyes National Seashore is the only national park where tule elk are found. The public, including myself, would be devastated at the thought of intentionally killing these majestic creatures. This in no way conforms with your mandate of protecting our recreational opportunities and public enjoyment of the coastal zone.

For all these reasons, I urge you to find the GMPA/EIS NOT consistent with the California Coastal Management Program. Thank you for your consideration.

Sincerely,

Louisa Jaskulski

**From:** Joan Rochlin <jsrochlin@gmail.com>

**Sent:** Monday, January 4, 2021 8:01 AM

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

**Subject:** Consistency declaration

Hi,

I am a local citizen very much concerned about the destiny and preservation of Point Reyes National Seashore. I am very much opposed to the expansion of ranching or other commercial activities on this precious resource and am opposed to the NPS plan. Please do not sign off on the Consistency Declaration. I support you in standing firm in defense of the ecology of PRNS.

Thank you,

Joan Rochlin

Emeryville, CA

**From:** Gilles Dubois <akuna123@xplornet.ca>

**Sent:** Sunday, January 3, 2021 4:56 AM

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

**Subject:** Stop cruelty

You have reject the **NPS'** recommended management plan which expands this National Seashore's cruel beef and dairy operations at the expense of its wildlife:

Merci.

Gilles dubois

**From:** Bear McGuinness <bear.mcguinness@gmail.com>  
**Sent:** Saturday, January 2, 2021 10:14 PM  
**To:** Coastal Point Reyes Management Plan <PointReyesManagementPlan@coastal.ca.gov>  
**Cc:** Craig\_Kenkel@nps.gov; Weber, John@Coastal <john.weber@coastal.ca.gov>  
**Subject:** Point Reyes General Land Management Plan

January 2, 2021

Subject: Please vote AGAINST the staff-recommended conditional compliance to the Point Reyes General Land Management Plan Amendment (GLMPA). It is not consistent with the California Coastal Management Plan.

Dear California Coastal Commission,

Point Reyes has been my home for almost 30 years, and I live here because of the National and State Parks. Until the pandemic put an end to it, I volunteered in the park doing habitat restoration. I've spent years weeding out mistakes that the ranches and park service made through bad policy (planting ice plant to "stabilize" the dunes) or negligence (thistles and invasive grasses that are spread by hay and sharp little hooves). In my opinion, what the park service is planning on doing with regard to extending ranch leases and expanding operations is a huge mistake, maybe one that this park and community will never recover from.

I cannot fathom how any of this will work. Inverness has had to ration water, and the reservoirs are still low. The water in Point Reyes is so salty that we stopped drinking it. But somehow there will be enough water for ranchers to farm without negatively impacting the native wildlife? Where will that water come from? What effect will the farming and chicken/goat ranching have on water quality?

There are so many visitors to the park that the road to Pierce Point Ranch had to be closed this past weekend. Everybody wants to see those tule elk! But you would support a plan that would bring in even more visitors and let them stay in places that can now, at least, rest at night? As it is, there aren't enough rangers to protect the land and animals—or the visitors and locals.

The tule elk are a great draw, for good reason. They are magnificent creatures, and Point Reyes is the only park where people can see them. Cows are everywhere. They already far exceed the carrying capacity of the land, and so many of them look sick from Johne's Disease. The fields are full of weeds, and manure disposal continues to be a problem. But these ranchers are the people who will be entrusted with greater stewardship? Last week a cow escaped and ran onto the road where she was hit by a car. What will happen when goats escape into the park or when they transmit diseases to wild animals?

The park service justifies this expansion by telling us that they are honoring the history of this area. This honor, however, extends only to ranchers. This plan disregards the legacy of environmentalists who helped create this park, and it does not honor the land and water or the native inhabitants, human and otherwise. You are erasing a much older history; and by doing so, you are replacing it with a lie. Ranchers were not the first or only people here. Farms and weedy fields are not native ecosystems. You can put up exhibits to educate people, but a national park full of ranches and farms, B&Bs, fences, chickens and goats instead of bobcats and foxes, cows instead of elk is actively miseducating people.

I am not against ranchers and farmers. But I am opposed to subsidizing private profit on public land. The ranching families were paid for their land and given an overly generous period of time to leave. But they haven't left. They've hunkered down and continue to benefit financially. Such a deal. There is a powerful movement in our country to privatize public land, and the ranching industry profits from it. If the agencies that are supposed to protect our public lands, our wild lands, do not stand up to them, who will?

Please vote AGAINST the staff-recommended conditional compliance to the Point Reyes General Land Management Plan Amendment (GLMPA). It is not consistent with the California Coastal Management Plan.

Sincerely,  
CB McGuinness  
Point Reyes Station, California



**From:** Shayna Fertig <srfertig@gmail.com>

**Sent:** Saturday, January 2, 2021 4:44 PM

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

**Cc:** Weber, John@Coastal <john.weber@coastal.ca.gov>; craig\_kenkel@nps.gov

**Subject:** Please save the tule elk

Dear Coastal Commission and Point Reyes National Seashore Superintendent Craig Kenkel,

I live in San Francisco and like to visit Point Reyes to enjoy beautiful coastal views and see the tule elk. I urge you not to support the proposed plan to cull the tule elk. The expansion of cattle ranching on this land will only increase issues of water quality, soil erosion, and climate change. Please prioritize the tule elk habitat and our beautiful coastline over commercial cattle ranching interests.

Thank you,

Shayna Fertig

From: David Walker <staff@walkercreations.com>  
Sent: Saturday, January 2, 2021 10:24 PM  
To: Coastal Point Reyes Management Plan <PointReyesManagementPlan@coastal.ca.gov>  
Subject: Re: January Meeting Agenda Item 6b

Commissioners,

It is imperative that you implement a policy that remove all livestock from our national parks, national forests, BLM lands – and all public lands!

Every portion of Point Reyes National Seashore – except perhaps a small portion of the northern portion – is replete with the invasive and rapacious bovine species – who have stripped the land of most vegetation – except the in eatable cheatgrass.

In light of this, I am writing to ask you to please find the NPS Consistency Determination for the General Management Plan Amendment/Final Environmental Impact Statement (GMPA/EIS) for Point Reyes National Seashore and the north district of Golden Gate National Recreation Area not consistent with the California Coastal Management Program.

This plan is not consistent to the maximum extent practicable with the California Coastal Management Plan for many reasons. It would allow significantly new development, uses and activities on national parkland which would irreversibly and negatively impact the nearby coastal zone resources and public enjoyment of the coastal zone. For example, the expanded and new agricultural uses and intensity would heighten the already troubling impacts to water quality in nearby streams, further threatening endangered salmonids in the area.

This plan would also treat native tule elk as problem animals to be killed or hazed, while authorizing additional and expanded agriculture uses which are certain to cause further conflicts between ranching operations and native wildlife. Native tule elk were brought back from the brink of extinction and Point Reyes National Seashore is the only national park where tule elk are found. The public, including myself, would be devastated at the thought of intentionally killing these majestic creatures. This in no way conforms with your mandate of protecting our recreational opportunities and public enjoyment of the coastal zone.

For all these reasons, I strongly, adamantly, and fervently urge you to find the GMPA/EIS not consistent with the California Coastal Management Program.

In summation, cull all the livestock and leave the indigenous wildlife – Tule elk – alone.

Thank you for your consideration.

Sincerely,

David Walker

From: Richard Curtis <rlc314@peoplepc.com>

Sent: Saturday, January 2, 2021 12:09 PM

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

Subject: Protect Tule Elk - January Meeting Agenda Item 6b

Dear Commissioners,

As a farm forester I have spent years ensuring the wildlife that grace our farm including elk, deer and other native wildlife are provided habitat to ensure their survival. I am absolutely astounded that you are proposing killing tule elk on public lands that were purchased many years ago to create Point Reyes National Seashore - especially on lands that were specifically purchased with public funds to protect the seashore and the elk! What are you thinking? These are public lands and public resources such as the tule elk must have priority over private commercial use of our land. Our parks were established to protect national resources and Killing public wildlife to benefit private commercial interests must not be the goal or purpose of the Point Reyes National Seashore! Clearly our national parks were not established to give private commercial interests the top priority by ignoring the interests of the public. When lands were acquired to create the park, landowners were provided fair and just compensation and are now simply squatters on public land. At this point commercial livestock grazing and farming activities should not be allowed and certainly not expanded in Point Reyes National Seashore especially at the expense of public interests such as recreation, wildlife habitat and natural scenic values.

That is why I am writing to ask you to please find the National Park Service Consistency Determination for the General Management Plan Amendment/Final Environmental Impact Statement (GMPA/EIS) for Point Reyes National Seashore and the north district of Golden Gate National Recreation Area are not consistent with the California Coastal Management Program.

To even the most casual observer it is obvious that the GMPA/EIS is not consistent with the California Coastal Management Plan and it is ludicrous to conclude otherwise. The Plan would allow significantly new development, uses and activities on national parkland that would irreversibly and negatively impact the nearby coastal zone resources and public enjoyment of the coastal zone. Clearly, the expanded and new agricultural uses and intensity would heighten the already significant adverse impacts to water quality in nearby streams, further threatening endangered fish populations in the area.

This plan would abuse and treat native tule elk as problem animals to be killed or hazed, while authorizing expanded commercial and non-agricultural uses which are certain to cause further conflicts between ranching operations and native wildlife. Native tule elk were once almost exterminated by mismanagement and brought back from the brink of extinction only because of the demands of the public. Point Reyes National Seashore was established to preserve the elk and other wildlife and now is the only national park where tule elk are found. Our family and the public have made their voices loud and clear that we want the elk protected. We are outraged that you would consider intentionally killing these majestic animals to benefit a few farmers that want to abuse lands that rightfully belong to the public. You have a mandate to protect our public resources in the Point Reyes National Seashore and our opportunities to enjoy these special lands. If anything the Plan should be committed to curtailing commercial interests not increasing them.

Please accept my comments and find the GMPA/EIS is not consistent with the California Coastal Management Program. Thank you for your considering my comments.

**From:** Joan Rochlin <jsrochlin@gmail.com>

**Sent:** Monday, January 4, 2021 8:01 AM

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

**Subject:** Consistency declaration

Hi,

I am a local citizen very much concerned about the destiny and preservation of Point Reyes National Seashore. I am very much opposed to the expansion of ranching or other commercial activities on this precious resource and am opposed to the NPS plan. Please do not sign off on the Consistency Declaration. I support you in standing firm in defense of the ecology of PRNS.

Thank you,

Joan Rochlin

Emeryville, CA

**From:** Roger Mann <[rogermann@btconnect.com](mailto:rogermann@btconnect.com)>  
**Sent:** Sunday, January 3, 2021 8:20 AM  
**To:** Ainsworth, John@Coastal <[John.Ainsworth@coastal.ca.gov](mailto:John.Ainsworth@coastal.ca.gov)>  
**Subject:** Point Reyes

*Dear Sir*

*I oppose expanded ranching and shooting Tule elk at Point Reyes National Seashore, recommended in Alternative B of the Environmental Impact Statement. Can you stop this travesty? Please urge further inquiry, such as water quality tests and a supplemental environmental impact report on drought and wildfires, before National Park Service Regional Director Woody Smeck signs this disastrous plan.*

*Yours sincerely*

*Roger Mann  
Lincoln, UK*

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This message and any files transmitted with it are confidential and intended solely for the use of the individual or entity to which they are addressed. If you are not the named person, you may not use, copy, deliver or disclose any part of this message to any other person. If you receive this message in error, please contact the sender immediately by return email. Please note that the sender does not accept any responsibility for viruses and it is your responsibility to take the necessary precautions to prevent the receipt of such viruses.

January 2, 2021

California Coastal Commission

Re: The National Park Service's General Management Plan Amendment's Consistency Determination for the Point Reyes National Seashore

Dear Commissioners,

The California Coastal Commission (CCC) should reject the National Park Service's (NPS) General Management Plan Amendment (GMPA) for the Point Reyes National Seashore (PRNS) because it is not consistent with State laws protecting California's coast.

The NPS has denied the CCC's staff's request to extend the review of the NPS's Consistency Determination until March 21, 2021. The NPS insists that the review take place at the January 14, 2021 hearing. This denial of additional time has effectively blocked the Commissioners and their staff from conducting a fair and thorough evaluation and analysis of the impact the proposed GMPA will have on the Environmentally Sensitive Habitat Areas (ESHAs) within the PRNS.

#### Impact on Environmentally Sensitive Habitat Areas

The NPS's Consistency Determination asserts that the majority of impacts Beef Ranching and Dairy Animals would have on the environment fall outside of the CCC's authority. However, the NPS fails to consider the spillover impact effect ranching and dairy farming have on the PRNS within the coastal zone subject to CCC's jurisdiction.

Under Alternative B, the NPS's preferred Alternative, the NPS would apply a new General Management Plan to the 28,700-acre Ranchland Planning Zone. The NPS would issue lease/permits with up to 20-year leases to the existing 24 families to continue beef and dairy operations on approximately 26,100 acres. The NPS estimates authorizing approximately 2,400 animal units of beef cattle and 3,115 dairy animals plus an unspecified number of sheep, goats and chickens.

While the NPS's proposed GMPA states that "Nearly all streams potentially occupied by salmonids would be excluded from grazing", the NPS provides no analysis for the potential impact of sediment runoff from soil erosion, manure and loss of water that ranching and dairy operations would have on the ESHAs.

Dairy farming is currently concentrated in the Pastoral Zone adjacent to Abbott's Lagoon and Kehoe Creek. Once a year in the fall, thousands of gallons of manure slurry are spread over the Pastoral Zone to promote the production of silage for dairy animals. Runoff of manure slurry during winter rains goes directly into ESHAs, Abbott's Lagoon and Kehoe Creek.

Hundreds of beef cattle graze on the PRNS lands along the Drakes and Limantour Esteros. These cattle degrade hillsides causing sediment runoff and their manure fouls existing creeks impacting ESHAs. This degradation is obvious along the Estero, Sunset Beach and Drake's Head trails.

According to the NPS's Environmental Impact Statement, the estimated annual water consumption for beef and dairy ranching totals 32 million to 72 million gallons per year. Drought, magnified by climate change, would further reduce the amount of water for ESHAs. The NPS provides no analysis for the impact the combination of drought and ranching would have on ESHAs, the survival of salmonoids and protected species like the Tule Elk.

#### Loss of Coastal Access to the Public

Currently miles of barbed wire fencing and locked gates on ranch lands severely limit the public's access to the coast, bays and estuaries in the PRNS. According to the NPS, nearly 2.5 million people visit the PRNS each year and yet no meaningful provision is made in the NPS's GMPA or Consistency Determination that would provide for the additional necessary parking areas and trails that equestrians, cyclists and hikers would need for coastal access. The current limited access is essentially the same as it was in 1970. While ranching families enjoy broad access to the coast throughout the PRNS, the taxpaying public has limited options for enjoying the magnificent beauty of the PRNS's coastline. Demand for coastal access will only increase as evidenced by the January 1, 2021 closure of PRNS roads due to the large number of visitors seeking access to the Park.

The Consistency Determination should not be fast tracked by the CCC

The future of the PRNS is too important for the CCC to make decisions without the necessary evaluation and analysis of the impacts NPS's proposed GMPA would have on the ESHAs and coastal access for the public. The PRNS was established for the benefit and enjoyment of the taxpaying public. It was not established to secure the financial benefits of commercial ranching and dairy farming for 24 families. I have been visiting the PRNS since 1970 and I have witnessed the degradation of parklands and fouling of waterways due to excessive ranching and dairy farming. Please reject the staff's conditional concurrence with the GMPA at the January 14, 2021 consistency determination.

Sincerely yours,

Charles W. Savage  
2150 Mill Road  
Novato, CA 94947

Linda Rames  
240 Morning Sun Avenue  
Mill Valley, CA 94941

January 3, 2021

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

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

Dear Commissioners:

We have read the staff report of the California Coastal Commission regarding the above subject, and we wish to comment on some of their conclusions.

1. The establishment of the Point Reyes National Seashore by Congress in 1962 allowed the ranchers who sold their land to the Federal Government to continue ranching for 25 years or until they died or retired. It was not a mandate to continue ranching forever in a national park.
2. The Tule elk, an endangered species which lives only in California, is a source of continued conflict with the ranchers. However, the tule elk are native to the area and do not cause any of the decimation of the peninsula as evidenced by cattle grazing on this land. Culling of these elk as proposed by the NPS and supported by your staff's report is unconscionable as these animals were original occupants of this land and were reestablished by the NPS on the Point Reyes Peninsula. If any animals should go, it is the cattle which are not native and are destroying the once beautiful grasslands.
3. National parks are supposed to be available to the public. At Point Reyes National Seashore, much of the park is fenced for cattle. Your staff advocates a Scenic Landscape, which would be available to the public, consisting of approximately 600 acres. However, 28,100 acres would be included in the ranchland zone which means it would be fenced off and unavailable to the very people who, through their taxes, pay for public access to this land.
4. The staff report vaguely addresses water quality but comes to no real conclusion except to say that some of the areas may be meeting water quality goals and others are not. The NPS has stated that it intends to address these issues; however, NPS has given no specifics as to how or when any of this might happen. Therefore, your staff recommends that the NPS provide a water quality assessment to the Coastal Commission before new leases are finalized. However, your commission is about to



vote on the whole issue of ranching on the peninsula on January 14, 2021. Obviously, this most important issue is being glossed over at a crucial time. Perhaps that is why NPS refused to give your commission enough time to study the reports. We think some of the commissioners should make a visit to the Point Reyes National Seashore to see how cattle feces are dealt with on the ranches. Currently, the feces are collected, spread, and watered down for fertilizer; thereby allowing pollution to leach into the waters surrounding the peninsula.

As long time residents of Marin County and frequent visitors to the Point Reyes Peninsula, we are appalled by the poor management standards of the National Park Service in regard to the Point Reyes National Seashore. As you know, there has been an impassioned outcry from thousands of people to stop ranching on these public lands for all the above reasons. We hope that you will take the concerns of these citizens into account when you decide how the park should move forward.

Point Reyes National Seashore belongs to all the people of America, not just 24 ranching families who have long since outlived their original agreements.

Sincerely,

Linda & Robert Rames

**From:** Stefan Williams <stwbirder@gmail.com>

**Sent:** Sunday, January 3, 2021 12:42 PM

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

**Subject:** Point Reyes Management plan

Dear Commission Member,

Please realize that granting a Consistency Determination for Alternative B will result in degradation of the ecosystem of the Seashore.

The Management plan does not identify ESHAs, areas that the Coastal Zone Act mandates be protected. Without identifying those areas, how can they be protected?

In addition if granted, the future of enforcement is truly uncertain - based on public records of past violations.

There are also other serious concerns with Alternative B.

I recognize that an all or nothing approach may be unacceptable.

If we are to get along let us compromise by allowing the number of ranches to slowly be reduced by attrition.

Sincerely,

Stefan Williams, a decades long Marin resident and a fan of Point Reyes National Seashore.

25Oak Way #597

Ross, CA 94957

**From:** Stephen Hymowitz <stevehymowitz@gmail.com>

**Sent:** Friday, January 1, 2021 8:41 PM

**To:** Coastal Point Reyes Management Plan <PointReyesManagementPlan@coastal.ca.gov>; Weber, John@Coastal <john.weber@coastal.ca.gov>; Craig\_Kenkel@nps.gov; action@forelk.org; governor@govmail.ca.gov

**Subject:** RE: I advise ending all animal-agriculture operations in Point Reyes National Seashore, i.e., get rid of the cattle, goats, sheep, etc.

Gentlemen and Gentlewomen of the California Coastal Commission, the Governor of the State of California and Other Interested Parties:

Please cease using the public lands within the Point Reyes National Seashore for animal-agriculture operations for all purposes, i.e., end grazing whether by cattle, goats, sheep, chickens or other animals, end the housing of any such animal(s) whether in barns, pastures or other within the Point Reyes National Seashore — and please do so as soon as currently in effect obligations reach their contractual termination date.

Please do not contract further for animal-agricultural operations in Point Reyes National Seashore, whether for pasture, temporary housing, or other.

My reasons in support of this request include but are not limited to:

- (1) The negative impact animal-agriculture operations have on native species (including the Tule elk),
- (2) Although multiple use on public lands can be appropriate in special cases, it is not in this case because of the location and primary use (natural lands and recreation), and because
- (3) The American Medical Association and other authoritative organizations have stated that plant-based nutrition is suitable for all stages of human nutrition including during pregnancy, lactation, for children, and for adults. This makes animal agriculture an option — not a necessity.

With the very best of wishes to all for a joyous and happy new year, I am,

Sincerely,

Stephen V. Hymowitz

Formerly a high school biology teacher (fully credentialed) for the Los Angeles Unified School District

[SteveHymowitz@gmail.com](mailto:SteveHymowitz@gmail.com)

**From:** Colleen Rose <colleenrose2017@gmail.com>

**Sent:** Friday, January 1, 2021 6:41 PM

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

**Cc:** Weber, John@Coastal <john.weber@coastal.ca.gov>; Craig\_Kenkel@nps.gov

**Subject:** Point Reyes National Seashore

I am opposed to the Park's plan to continue commercial cattle operations within the National Park.

When Point Reyes became a National Park in 1962, the federal government (on behalf of all US citizens) paid millions of dollars to the ranchers to purchase their land. They were given 25-year leases and were then to be phased out of the park. Their original leases have long expired, but the park continues to re-issue their permits and allow them to continue operation. Why, I don't know. What I do know is: The ranchers' time is up!

It is well documented that cattle ranching is the highest emitter of greenhouse gases. The manure runoff contaminates some of our most precious waterways, including where the coho salmon spawn and elephant seals raise their pups. Cattle production spreads noxious weeds and interferes with wildlife and biodiversity. New born calves are ripped from their mothers shortly after birth and put in cages, in filth, to be fattened for slaughter or to become dairy cows like their mothers, whose milk is sold to the highest bidder. Furthermore, ranchers want the park to cull the wild elk herd because Tule Elk "eat too much grass." Each head of cattle consumes 30 gallons of water per day on average. The native Tule Elk do not. And ranchers want to "cull" the elk herds. The elk! Please go here to see what cattle and ranchers do to our land:

<https://www.youtube.com/watch?v=z9OEQOy3v0E>

It's time for the ranchers to go. They've had plenty of time to retrain for new occupations. They might try solar energy. They've all had more than their share of use of our public lands. It's time the Park was returned to the people for our enjoyment and preservation for decades to come.

Tell the ranchers: Your time is up!

Period.

Sincerely,

Colleen J. Rose

From: Warren Watkins <owlwo@sonic.net>

Sent: Thursday, December 31, 2020 3:40 PM

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

Subject: Pt Reyes elk

Please represent us as native CA and save our elk! We live in Sonoma County and go there often.

Cows are common and do excess damage to the water and grasslands.

We ask that you look to the future of the Seashore.

Please

Warren & Janis Watkins

James Coda  
2009 Falcon Ridge Drive  
Petaluma, CA 94954

December 31, 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); 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 Commission Members:

I have the following comments on and requested amendments to the staff's three recommended conditions on pages 6-7 (and repeated on page 51) of the staff report. Those conditions are quoted below. My amending language is in bold.

In the first paragraph I have added the words "Kehoe Lagoon" and "Drakes Bay" in line 4 to make absolutely clear that the creeks that drain into them are included for monitoring. Also, at the end of each of the staff's three conditions I have added a sentence providing that the public shall be provided the opportunity to comment.

Finally, I have added a fourth paragraph to create a clear deadline for the ranches to come into compliance with applicable water quality standards and to convert the conditional concurrence into an objection if the standards are not met. I chose three years for NPS and the ranchers to modify ranching to meet standards because NPS acquired these lands approximately fifty years ago and water quality improvements have been minimal. If NPS and the ranchers can't meet water quality standards in three years, they will never meet them.

1. Proposed overall strategy and timeline for assessing and improving water quality in areas of the GMPA outside of the Tomales Bay watershed, with a particular focus on areas that drain to Abbott's Lagoon, **Kehoe Lagoon, Drakes Bay** and Drakes Estero and the creeks that drain to these features, but also including areas that drain directly to the Pacific Ocean. The strategy should be informed by existing water quality data and

should prioritize resolution of the most significant water quality-related issues first. The timeline should reflect short and long-term water quality goals and management strategies. Both the strategy and timeline should be updated on an annual basis to reflect information and analysis provided under items 2 and 3 below. **The public shall be provided 30 days to comment on NPS's proposed overall strategy and timeline.**

2. Proposed sampling methodology for collecting quantitative water quality data in areas of the GMPA outside of the Tomales Bay watershed, consistent with the strategy provided in item 1 above. Data collection should be sufficient to determine if water quality standards are being met throughout the area and to inform identification of water quality-related issues and prioritization of management strategies to address those issues, as described in Item 3 below.

The sampling methodology should incorporate guidelines and requirements from state and federal agencies (i.e., RWQCB, State Water Control Board, and/or U.S. Environmental Protection Agency) related to sampling coverage and frequency, sample testing procedures, and reporting of results. **The public shall be provided 30 days to comment on NPS's proposed sampling methodology.**

3. A provision for NPS reporting of monitoring results and water quality analysis to the Executive Director of the Commission on an annual basis. Annual reports should include monitoring results from all previous years, assessment of the results against relevant state and federal water quality standards, proposed measures to address identified issues including identification of priority areas for additional ranching or grazing related best practices, and plans for incorporating

such practices into ROAs or implementation through other measures, as appropriate, and evaluation of the efficacy of existing measures. Annual reports shall also include results of continuing water quality monitoring of the GGNRA portions of the Tomales Bay watershed (i.e., Olema and Lagunitas Creeks). Following initial monitoring reporting, subsequent NPS reports should also describe and evaluate measures implemented to address identified water quality issues. **The public shall be provided 30 days to comment on NPS's annual reports.**

**4. NPS shall have three years to bring all ranches into compliance with all relevant water quality parameters. If NPS fails to bring all ranches into compliance with all water quality parameters within three years, this conditional concurrence shall become an objection.**

Sincerely,

s/James Coda

**From:** Michael Chatham <[mchatham28@gmail.com](mailto:mchatham28@gmail.com)>  
**Sent:** Wednesday, December 30, 2020 5:38 PM  
**To:** Weber, John@Coastal <[john.weber@coastal.ca.gov](mailto:john.weber@coastal.ca.gov)>  
**Subject:** Point Reyes

Dear Mr. Weber,

With all due respect, I don't understand why a national park would allow private businesses (such as cattle ranching organizations/beef producers) to operate within its borders. If a shopping mall or Walmart wanted to break ground within a national park such as Yellowstone, would that sort of thing be seriously considered, even for a moment?

Furthermore, the interests of the beef/dairy industry seem to be contrary to the goals/purpose of a national park in the first place.

If someone wanted to take the time to explain this to me, I would be perfectly willing to listen.

Sincerely,

Michael Chatham



**From:** Paula <paulalecht@yahoo.com>  
**Sent:** Thursday, December 31, 2020 10:40 AM  
**To:** Coastal Point Reyes Management Plan <PointReyesManagementPlan@coastal.ca.gov>  
**Cc:** Weber, John@Coastal <john.weber@coastal.ca.gov>; craig\_kenkel@nps.gov  
**Subject:** Point Reyes General Land Management Plan Amendment

Dear California Coastal Commission,

I am writing to ask you to please vote against the conditional compliance to the Point Reyes General Land Management Plan Amendment on January 14. The National Park Service consistency determination isn't consistent with the California Coastal Management Plan. The CCC staff request to have until March to review the plan but were denied by the National Park Service who asked that the vote happen in January, denying adequate time for a proper assessment of the plan.

The NPS plan doesn't include anything about water quality in the Point Reyes National Seashore portion of the plan. Nothing about climate impacts from cattle ranching on migratory birds and endangered salmon was addressed. Why not allow time to review all the relevant information?

There is not enough information or time to analyze it. This is not an issue we should rush through. In California, we set the example of environmental integrity.

Sincerely,

Paula Lecht

**From:** lauren@foodispower.org <lauren@foodispower.org>

**Sent:** Thursday, December 31, 2020 10:21 AM

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

**Cc:** Weber, John@Coastal <john.weber@coastal.ca.gov>; Craig\_Kenkel@nps.gov

**Subject:** Please vote against the conditional compliance on January 14

Dear California Coastal Commissioners,

I am writing on behalf of Food Empowerment Project to ask you to vote AGAINST the staff-recommended conditional compliance to the Point Reyes General Land Management Plan Amendment (GLMPA), and instead object to the National Park Service consistency determination, as it is not consistent with the California Coastal Management Plan.

The CCC received over 20,000 comments opposing the park's plan to continue commercial cattle operations within the National Park. Many of those comments contain scientific and technical data that will take longer to analyze than just a few weeks. And, we know more information is still being collected and submitted.

The CCC staff had requested until March 2021 to analyze information before issuing the report, but was denied by the National Park Service. They asked that the vote happen in January— denying adequate time for a proper assessment of their plan. Public lands are under attack, and Point Reyes seems to be one of them.

In addition, the staff report ***lacked*** sufficient data on other spillover effects from the Point Reyes GLMPA. For example, nothing about water quantity was addressed in the entire Point Reyes National Seashore portion of the planning area. Nothing about climate impacts from cattle was addressed. What about migratory birds? What about eelgrass and orcas?

***That's why it is important for you to vote against this compliance.***

This is not an issue we should rush through. In California, we set the example of environmental integrity— so let's not rush our decision making process without proper analysis of all the information. Please vote against the conditional compliance on January 14.

**From:** TheLilyMartinez <lilymartinez123@gmail.com>

**Sent:** Thursday, December 31, 2020 12:55 AM

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

**Cc:** Weber, John@Coastal <john.weber@coastal.ca.gov>; Craig\_kenkel@nps.gov

**Subject:**

Hello,

My name is Lily and I am a Bay Area local and am astounded by the lack of effort to truly minimize environmental damage in the Point Reyes area.

I am well aware that accommodating ranchers and dairy farms on the public land has a long history and more relevantly- provides funding. However- this is an antiquated practice that has led to disastrous environmental conditions in the area.

You must already be aware of- the e.coli outbreaks, the invasion of non-native plants, anaerobic stream conditions causing unlivable conditions for endangered salmon, erosion, loss of native biota- all related to the presence of farming on these public lands.

In this modern day- we need solutions that work FOR the environment, not for our pockets. We have spent so many years degrading our environment for short term financial gains- but this has led to crisis. It is especially upsetting to see California public agencies stray from environmental security for short term financial gains and to accommodate private interests for political purposes. We should be leading the nation.

The proposals to expand security for farming on these public lands is completely inappropriate and against the key purpose of both the NPS and the CCC. I strongly advise you to choose a different path! More time needs to be allocated to understanding the detrimental impacts of these expansions- and we need to protect the environment more than anything.

This is an issue that many are passionate about. This is the time to choose if you'll be part of the right side of history- preserving our public resources and environmental sanctity- or if you will be part of its degradation and mismanagement.

Please do the right thing. Please vote against the current proposal and find a balance that leans towards our environment instead of politics and money.

Thank you

**From:** robert raven <robraven60@gmail.com>

**Sent:** Wednesday, December 30, 2020 10:41 PM

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

**Subject:** Elk plan

I hope that you will look at the facts on the ground. The existing cattle ranches are destroying the National Seashore's natural habitat. There is overgrazing and runoffs.

The cattle should be removed ASAP, and restore the ranch land to Nature and hiking.

The elk enclosure looks healthy, natural. Let the elk roam freely throughout Pt. Reyes.

**From:** mprice@the-acorn.com <mprice@the-acorn.com>

**Sent:** Wednesday, December 30, 2020 10:31 PM

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

**Cc:** nrdems@mail.house.gov; Craig\_kenkel@nps.gov

**Subject:** California Coastal Commission's Point Reyes decision

To Whom it may concern:

I recently read that the California Coastal Commission is in the process of determining **whether the National Park Service's plan for the Seashore is "consistent" with State laws** protecting the coast.

I agree with those who feel that the Commission needs more time and information to **confidently decide whether the NPS' plan is adequate and consistent with protecting the** California coast. Please do not approve conditional concurrence with the Point Reyes plan at the January 14 Commission meeting.

Thank you for considering my request.

Marilyn Price

Mill Valley

**From:** Bernie Album <[allbernie5@gmail.com](mailto:allbernie5@gmail.com)>  
**Sent:** Wednesday, December 30, 2020 2:47 PM  
**To:** Weber, John@Coastal <[john.weber@coastal.ca.gov](mailto:john.weber@coastal.ca.gov)>  
**Cc:** [craig.kenkel@nps.gov](mailto:craig.kenkel@nps.gov) <[craig.kenkel@nps.gov](mailto:craig.kenkel@nps.gov)>  
**Subject:** Point Reyes National Seashore Park

California Coastal Commission members,

Vote against the staff-recommended conditional compliance to the point Reyes General Land Management Plan Amendment

and instead OBJECT to the National Park Service consistency determination, as it is not consistent with the California Coastal Management Plan. The CCC received over 20,000 comments opposing the Parks plan to continue commercial cattle operations.

Many comments contain technical data that will take longer to analyze. More information is being collected that will be submitted later.

The CCC staff had requested until March 2021 to analyze information before issuing a report but was denied by the NPS. They ask that the vote happen in January 2021-denying adequate time for proper assessment of their plan. It is not a coincidence that the vote will happen just a week before the current Trump administration will leave office. Public lands are under attack, and Point Reyes is one of them.

In addition, the staff report lacked sufficient data on other spillover effects from the Point Reyes GLMPA. For example, nothing about water quality was addressed. Nothing about climate impacts from cattle was addressed. Nothing about migratory birds or the eelgrass and orcas and salmon.

I am not a scientist, but when making a decision that will impact the California Coast for the next several decades, it is imperative to have all the relevant information, and enough time to analyze that information.

That is why it is important to vote against this compliance-there is simply not enough information and not enough time to analyze it.

Let's do this right- keep our park alive and ensure Point Reyes National Seashore National Park will be preserved for all residences. Please vote against the conditional compliance on January 14.

Sincerely,

Bernie Album

**From:** Lonna Richmond <lonnajeau@gmail.com>

**Sent:** Wednesday, December 30, 2020 1:05 PM

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

**Cc:** Weber, John@Coastal <john.weber@coastal.ca.gov>; Craig\_Kenkel@nps.gov

**Subject:** Pt. Reyes General Land Management Plan Amendment and Conditional Compliance

Hello California Coastal Commission,

I am a long time resident of Marin County and consider Pt. Reyes and Muir Woods to be my local national parks.

Recently I have been following the NPS General Management Plan Amendment and know that your commission will be reviewing their consistency determination very soon. I request wholeheartedly that you reject the NPS as their plan has not now or in the past ever been consistent with the

California Coastal Act.

I originally became interested in this regarding the plight of the endemic tule elk, and since that time I have become more aware of the disastrous effects that the ranch/dairy operations have had on our iconic coastal national park at PRNS. The CCC received thousands of comments opposing these businesses from continuing on our public land - many are filled with scientific and technical data that needs to be checked and frankly, given much more

thought than the time allotted. I know that the CCC asked for more time, but I believe this is all being rushed so that the present administration in Washington can get all their dirty deeds done before the changing of the guards.

In addition, in the entire PRNS portion of planning in their GLMPA, they didn't even address water quality, climate impacts from cattle, and salmon or other endangered animals and plants (i.e. eelgrass)...and from what I understand, no water quality reports have been done since 2013. I know that sometimes

the water is so toxic that the NPS has closed beaches.

I also know that the CCC has been more vigilant in issuing directives to the NPS regarding water quality issues, yet the NPS has not followed through.

Certainly when the fox is in charge of the hen house, things go awry. This is so important for our future and for the future of many generations, who



will have to live with the CCC's determination. We cannot just rush through this process. So much depends on what you decide and what you accept as mitigation measures from NPS.

I used to work in Great Smoky Mountains NP in the Science Division at Uplands Research Lab (1983-89). Science was important then and taken very seriously. Please do your due diligence and give science a front row seat. This is crucial for our planet and wildlife and we cannot (you cannot) just rubber stamp this. Please vote against the conditional compliance until you have had as much time as it takes to analyze all the data, in order to

give the most comprehensive decision based on all the information you have. Thank you for your integrity and concern.

Sincerely,

Lonna Richmond

From: Carol Denney <cdenney@igc.org>  
Sent: Wednesday, December 30, 2020 12:47 PM  
To: Coastal Point Reyes Management Plan <PointReyesManagementPlan@coastal.ca.gov>;  
nrdeems@mail.house.gov; Craig\_kenkel@nps.gov  
Subject: Ranching Plan for Point Reyes

Dear California Coastal Commission,

The Trump Administration's is fast-tracking leases for drilling, logging, mining and grazing on Americans' public lands. Please resist the temptation to allow the damaging current plan to extend ranching at Point Reyes National Seashore to move forward with a narrow evaluation of water quality, but without the broader consideration of its impact on air quality and climate impacts linked to cattle, the number one source of greenhouse gasses at the Seashore, and the incomprehensible loss of public access to the coast as a result of special uses is at odds with the CCC's commitment to inclusion and social justice.

The NPS maintains that the majority of ranching impacts to the environment are outside the CCC's authority. While the Coastal Zone encompasses about one-quarter mile inland from the ocean, "spillover" impacts from federal lands to the Coastal Zone fall within the CCC's jurisdiction.

It is a sacred responsibility to address these impacts for the future of all Californians and the ecosystem struggling under the current impacts, which I believe the National Park Service has yet to fully illustrate. Please simply reject the current plan. Californians, and future Californians depend on you to recognize that a narrow evaluation does a severe disservice to the national interests which rely on your having broader judgment representing the public's best interests.

Thank you for your consideration,

Carol Denney From: samuel casebolt <underyourbreath@yahoo.com>  
Sent: Wednesday, December 30, 2020 12:36 PM  
To: Coastal Point Reyes Management Plan <PointReyesManagementPlan@coastal.ca.gov>  
Subject: Point Reyes Management Plan

Hello,

My name is Samuel. I am a Bay Area local and am astounded by the lack of effort to truly minimize environmental damage in the Point Reyes area.

I am well aware that accommodating ranchers and dairy farms on the public land has a long history and more relevantly- provides funding. However- this is an antiquated practice that has led to disastrous environmental conditions in the area.

You must already be aware of- the e.coli outbreaks, the invasion of non-native plants, anaerobic stream conditions causing unlivable conditions for endangered salmon, erosion, loss of native biota- all related to the presence of farming on these public lands.

In this modern day- we need solutions that work FOR the environment, not for our pockets. We have spent so many years degrading our environment for short term financial gains- but this has led to crisis. It is especially upsetting to see California public agencies stray from environmental security for short term financial gains and to accommodate private interests for political purposes. We should be leading the nation.

The proposals to expand security for farming on these public lands is completely inappropriate and against the key purpose of both the NPS and the CCC. I strongly advise you to choose a different path! More time needs to be allocated to understanding the detrimental impacts of these expansions- and we need to protect the environment more than anything.

This is an issue that many are passionate about. This is the time to choose if you'll be part of the right side of history- preserving our public resources and environmental sanctity- or if you will be part of its degradation and mismanagement.

Please do the right thing. Please vote against the current proposal and find a balance that leans towards our environment instead of politics and money.

Thank you

Samuel Michael Casebolt

**From:** Adriana Kolev <adrianakolev@gmail.com>

**Sent:** Wednesday, December 30, 2020 11:59 AM

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

**Cc:** Weber, John@Coastal <john.weber@coastal.ca.gov>; Craig\_kenkel@nps.gov

**Subject:** Point Reyes Management Plan

Hello,

My name is Adriana and I am an environmental scientist- with specialization in air quality, water quality, and ecology.

Apart from being a scientist, I am also a Bay Area local and am astounded by the lack of effort to truly minimize environmental damage in the Point Reyes area.

I am well aware that accommodating ranchers and dairy farms on the public land has a long history and more relevantly- provides funding. However- this is an antiquated practice that has led to disastrous environmental conditions in the area.

You must already be aware of- the e.coli outbreaks, the invasion of non-native plants, anaerobic stream conditions causing unlivable conditions for endangered salmon, erosion, loss of native biota- all related to the presence of farming on these public lands.

In this modern day- we need solutions that work FOR the environment, not for our pockets. We have spent so many years degrading our environment for short term financial gains- but this has led to crisis. It is especially upsetting to see California public agencies stray from environmental security for short term financial gains and to accommodate private interests for political purposes. We should be leading the nation.

The proposals to expand security for farming on these public lands is completely inappropriate and against the key purpose of both the NPS and the CCC. I strongly advise you to choose a different path! More time needs to be allocated to understanding the detrimental impacts of these expansions- and we need to protect the environment more than anything.

This is an issue that many are passionate about. This is the time to choose if you'll be part of the right side of history- preserving our public resources and environmental sanctity- or if you will be part of its degradation and mismanagement.

Please do the right thing. Please vote against the current proposal and find a balance that leans towards our environment instead of politics and money.

Thank you

Adriana

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

**Sent:** Wednesday, December 30, 2020 11:48 AM

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

**Subject:** Fwd: Ask a Ranger: What it's like to be a marine mammal ecologist at Point Reyes

An interview in SFGate (Travel/California Parks) with an NPS staff person named Sarah Codde, who "volunteered at the Marine Mammal Center in Sausalito and interned at Point Reyes National Seashore, where she worked her way up to a permanent job as a marine mammal ecologist."

<https://www.sfgate.com/california-parks/article/point-reyes-seashore-california-seal-selfies-whale-15834408.php>

Not sure what restoration process she's referring to in Drakes Estero...

Excerpts/

SFGATE: What's something special about Point Reyes that few people seem aware of?

CODDE: Something I don't think many people know about Point Reyes is that it is home to the largest concentration of harbor seals in California. Many people know there are harbor seals, and they often see small groups of harbor seals. But the largest colonies of harbor seals here are in inaccessible areas and areas we close to the public during breeding season. The huge population of harbor seals is one of many reasons why Point Reyes is so special and important.

SFGATE: What's the hardest part of your job?

CODDE: This is a national park, so we try to stay hands off. And unfortunately, the lives of elephant seals can be brutal, and we see a lot of pup mortality. Pups get abandoned and basically starve to death, and that's hard to watch, but we only interfere if the problem is human-caused. If it's natural, we have to leave them alone.

SFGATE: What sorts of challenges are the seals facing?

CODDE: We're seeing an impact from climate change on elephant seals — there's a loss of habitat because of rising sea level and erosion. And in Point Reyes, the colony of elephant seals is expanding and moving closer to areas accessible to the public. We are trying to provide a safe place for elephant seals, but people are right there. That's created an issue with people taking selfies with elephant seals, which is disruptive for the seals and dangerous for the humans. Part of our mission is to provide enjoyment to the public, but we want them to take care of Point Reyes, and to care about the seals.

SFGATE: What other creatures do you work with for your job?

CODDE: I assist with whale strandings. **I also conduct eelgrass surveys to monitor the restoration process, which involves snorkeling in Drakes Estero. We've experienced a major loss of eelgrass in California — largely due to coastal development, dredging and excessive runoff — and it's been designated a habitat of concern at both the state and federal levels.** Eelgrass provides nursery grounds for fish, food for birds and stability for sediments, and it also helps improve water quality, absorb wave action and reduce coastal flooding. It's a huge benefit to the estuary ecosystem.

**From:** Cathy Mattison <mattison94104@yahoo.com>

**Sent:** Wednesday, December 30, 2020 11:13 AM

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

**Cc:** nrdems@mail.house.gov; Craig\_kenkel@nps.gov

**Subject:** Urgent: Commissioners please do not to sign off on the Consistency Declaration for Pt. Reyes National Seashore.

My family lives in Albany, CA in Alameda County. We enjoy visiting Pt. Reyes National Seashore. I am contacting you about the National Park Service's decision to deny the California Coastal Commission staff's request to extend the review of the Consistency Determination until March 2021. In doing so the federal government has denied the Commissioners the time to fairly analyze and evaluate how 24 commercial ranching operations in a national park that belongs to 328 million Americans will impact coastal resources that belong to 40 million Californians.

The National Seashore is a keystone for California's interconnected coastal resources. This Federal administration's refusal to accept the Commission's proposed timeline is an attempt to usurp the state's ability to request additional information. It denies the Commission the time necessary to adequately analyze and evaluate how the maintenance of ranching operations and further agricultural development in these national parks will affect coastal resources for decades to come.

The Commission needs more time and information to confidently decide whether the NPS' plan is adequate and consistent with protecting the California coast. Please do **not** approve conditional concurrence with the Point Reyes plan at the January 14 Commission meeting.

Catherine Mattison

415 Cornell Ave. Unit 202

Albany, CA 94706

[mattison94104@yahoo.com](mailto:mattison94104@yahoo.com)

**From:** Emese Wood <emesew@gmail.com>

**Sent:** Wednesday, December 30, 2020 10:21 AM

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

**Cc:** Weber, John@Coastal <john.weber@coastal.ca.gov>; Craig\_Kenkel@nps.gov

**Subject:** GLMPA

To: California Coastal Commission,

I am writing to ask you to vote AGAINST the staff-recommended conditional compliance to the Point Reyes General Land Management Plan Amendment (GLMPA), and instead object to the National Park Service consistency determination, as it is not consistent with the California Coastal Management Plan.

The vote on the conditional compliance is scheduled for January 14th. That is just a few weeks after the staff report came out. The CCC received over 20,000 comments opposing the park's plan to continue commercial cattle operations within the National Park. Many of those comments contain scientific and technical data that will take longer to analyze than just a few weeks. And, we know more information is still being collected and submitted. The CCC staff had requested until March 2021 to analyze information before issuing the report, but was denied by the National Park Service. They asked that the vote happen in January— denying adequate time for a proper assessment of their plan. It is not a coincidence that the vote will happen just a week before the current administration leaves office. Public lands are under attack, and Point Reyes seems to be one of them.

In addition, the staff report ***lacked*** sufficient data on other spillover effects from the Point Reyes GLMPA. For example, nothing about water quantity was addressed in the entire Point Reyes National Seashore portion of the planning area. Nothing about climate impacts from cattle was addressed. What about migratory birds? What about eelgrass and orcas? What about endangered salmon?

***I am not a scientist, but when making a decision that will impact the California Coast for the next several decades, it is imperative to have all the relevant information, and enough time to analyze that information.***

That's why it is important to vote against this compliance— there is simply not enough information, and not enough time to analyze it.

**Let's do this right — let's keep our parks alive and ensure parks for all our residents.**

This is not an issue we should rush through. In California, we set the example of environmental integrity— so let's not rush our decision making process without proper analysis of all the information. Please vote against the conditional compliance on January 14.

Sincerely,

Emese Wood

San Rafael, CA

**From:** Patricia Huey <pat.huey@sbcglobal.net>

**Sent:** Wednesday, December 30, 2020 9:58 AM

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

**Cc:** Weber, John@Coastal <john.weber@coastal.ca.gov>; Craig\_Kenkel@nps.gov

**Subject:** Point Reyes National Seashore plan

Dear California Coastal Commission,

I have just learned that you support the staff-recommended conditional compliance to the Point Reyes General Land Management Plan Amendment (GLMPA). Please reconsider this terrible idea. Instead do what you can to preserve this park for its original purpose: a 100 percent wildlife sanctuary.

There are many problems with the plan to allow cattle to remain in the park. The California Coastal Commission received over 20,000 comments in favor of preserving the park and opposing the dreadful pro-cattle plan. Many of the comments are from respected scientists and environmentalists who are experts in this field. Your staff requested that the vote happen in January -- this not adequate time to fully study the report and make an intelligent decision. It is clearly to be done to be in alignment with the anti-environment policies of the Trump administration. More and more scientists agree that the leading cause of climate change -- and pandemics -- is animal agriculture. Anyone visiting Point Reyes National Seashore can easily see the detrimental damage the cattle, who are not even native to America -- are causing. We need to preserve the native wildlife because without them, the lands will surely degrade into one large desert.

I urge you to 1) vote against the pro-ranching stance the plan supports and 2) at least postpone the decision until the report has been adequately studied.

Thank you,

Patricia Huey



From: Leana Lovejoy <loveandjoy1111@gmail.com>  
Sent: Wednesday, December 30, 2020 9:39 AM  
To: Coastal Point Reyes Management Plan <PointReyesManagementPlan@coastal.ca.gov>  
Cc: Weber, John@Coastal <john.weber@coastal.ca.gov>; Craig\_Kenkel@nps.gov  
Subject: Pt Reyes and the native Tule elk

Please vote AGAINST the staff-recommended conditional compliance to the GLMPA and stay true to the Coastal Management Plan.

The vote is scheduled for January 14 - just a few weeks away and I find the idea of expanding cattle grazing on public lands to be HEINOUS and WRONG.  
There are so many reasons this is wrong:

Subsidizing the ecologically harmful overgrazing of our lands in favor of roaming wildlife is wrong. Cattle operations are hugely responsible for the climate change issue we are facing - it is a documented set of facts that the impact of animal agriculture - for dairy or for beef is wide reaching and destructive. This is time to be forward thinking and protect our natural resources.

As a citizen of Northern California I am in despair at the recklessness of the choice to expand grazing when we need a huge reduction in animal agriculture to re-balance our environment air and water quality especially. Our hills are denuded due to dairy operations and this is evident to the eye, no scientific studies even needed to assess this truth.

There are been inadequate time allowed to assess the plan, and this is an unpopular choice with the public, the people who in fact own the park.

Please make a good choice, and vote for the elk, not cattle.... our parklands are precious and belong to the wilderness.

Thank you

Leana Lovejoy

**From:** laura haworth <haworthlaura@yahoo.com>  
**Sent:** Wednesday, December 30, 2020 9:39 AM  
**To:** Coastal Point Reyes Management Plan <PointReyesManagementPlan@coastal.ca.gov>  
**Subject:** John.Weber@coastal.ca.gov Craig\_Kenkel@nps.gov

Hello,

I am writing to ask you to vote AGAINST the staff-recommended conditional compliance to the Point Reyes General Land Management Plan Amendment (GLMPA), and instead object to the National Park Service consistency determination, as it is not consistent with the California Coastal Management Plan.

I live in Oakland and Point Reyes and the Tule elk habitat there are special.

The vote on the conditional compliance is scheduled for January 14th. That is just a few weeks after the staff report came out. The CCC received over 20,000 comments opposing the park's plan to continue commercial cattle operations within the National Park. Many of those comments contain scientific and technical data that will take longer to analyze than just a few weeks. And, we know more information is still being collected and submitted.

The CCC staff had requested until March 2021 to analyze information before issuing the report, but was denied by the National Park Service. They asked that the vote happen in January— denying adequate time for a proper assessment of their plan. It is not a coincidence that the vote will happen just a week before the current administration leaves office. Public lands are under attack, and Point Reyes seems to be one of them.

In addition, the staff report ***lacked*** sufficient data on other spillover effects from the Point Reyes GLMPA. For example, nothing about water quantity was addressed in the entire Point Reyes National Seashore portion of the planning area. Nothing about climate impacts from cattle was addressed. What about migratory birds? What about eelgrass and orcas? What about endangered salmon?

***I am not a scientist, but when making a decision that will impact the California Coast for the next several decades, it is imperative to have all the relevant information, and enough time to analyze that information.***

***That's why it is important to vote against this compliance— there is simply not enough information, and not enough time to analyze it.***

***Let's do this right — let's keep our parks alive and ensure parks for all our residents.***

***This is not an issue we should rush through. In California, we set the example of environmental integrity— so let's not rush our decision making process without proper analysis of all the information. Please vote against the conditional compliance on January 14.***

Laura Haworth

**From:** Kay Wood <kayw318@gmail.com>

**Sent:** Wednesday, December 30, 2020 9:31 AM

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

**Cc:** Weber, John@Coastal <john.weber@coastal.ca.gov>; Craig\_Kenkel@nps.gov

**Subject:** Please do your job and protect our coast line.

Hi California Coastal Commission,

I am writing to ask you to vote AGAINST the staff-recommended conditional compliance to the Point Reyes General Land Management Plan Amendment (GLMPA), and instead object to the National Park Service consistency determination, as it is not consistent with the California Coastal Management Plan.

The vote on the conditional compliance is scheduled for January 14th. That is just a few weeks after the staff report came out. The CCC received over 20,000 comments opposing the park's plan to continue commercial cattle operations within the National Park. Many of those comments contain scientific and technical data that will take longer to analyze than just a few weeks. And, we know more information is still being collected and submitted. The CCC staff had requested until March 2021 to analyze information before issuing the report, but was denied by the National Park Service. They asked that the vote happen in January— denying adequate time for a proper assessment of their plan. It is not a coincidence that the vote will happen just a week before the current administration leaves office. Public lands are under attack, and Point Reyes seems to be one of them.

In addition, the staff report ***lacked*** sufficient data on other spillover effects from the Point Reyes GLMPA. For example, nothing about water quantity was addressed in the entire Point Reyes National Seashore portion of the planning area. Nothing about climate impacts from cattle was addressed. What about migratory birds? What about eelgrass and orcas? What about endangered salmon?

***I am not a scientist, but when making a decision that will impact the California Coast for the next several decades, it is imperative to have all the relevant information, and enough time to analyze that information.***

That's why it is important to vote against this compliance— there is simply not enough information, and not enough time to analyze it.

**Let's do this right — let's keep our parks alive and ensure parks for all our residents.**

This is not an issue we should rush through. In California, we set the example of environmental integrity— so let's not rush our decision making process without proper analysis of all the information. Please vote against the conditional compliance on January 14.

Sincerely,

Kay Wood

Santa Rosa

To Whom it May Concern,

Leaving the fate of Point Reyes water conditions to the park's "promises of improvement" is the equivalent of Child Protective Services walking into a room where a child is being beaten by his father with a rod then reacting to that scene by turning around and walking out the door while stating, "I'm sure things will improve." No, even that isn't harsh enough. A more accurate analogy would be to bear witness to child abuse for 50 years and still say, "I'm sure things will improve, in fact let's provide a few more children." CCC doing nothing more than stating a concern is in effect the equivalent of giving a passive blessing to the continued abuse of land and water in Point Reyes...and to abuse the land and water is to abuse the local flora and fauna.

I never intended to document what has been taking place in Point Reyes, I simply was moved to do so by the pure shock of what I was witnessing. Was I crazy? Did I simply not understand what my eyes were attempting to tell me? Quite the contrary; I would later hear the testimonies of former NPS and BLM employees proclaiming that the land management in Point Reyes was the worst they had seen ANYWHERE. It takes a rather severe situation for NPS and BLM staff to speak out against their employers! Later I would learn that Point Reyes ranks consistently at the top of the list of most polluted water zones in the nation. This isn't just a matter of things not being done as well as could be, this is a case of things being done as badly as can be gotten away with.

An examination of FOIA documents obtained by The Center for Biological Diversity provides a seemingly never ending supply of violations committed by ranchers coupled with a lack of compliance by the ranchers and lack of follow-up by the park staff (the stack of violations currently in front of me is four fingers high) . In addition to reading these documents I had a two hour conversation with the park's outreach coordinator, Melanie Gunn, during which she said, and I quote, "I can't tell you how many times we've had to meet with the ranchers about their violations of land use". A stout rancher defender and apologist, this was one of many slip-ups she made during the conversation in which she accidentally condemned the rancher / park staff relationship in an effort to defend other arguments.

In the same conversation I asked about the water waivers that are handed out every year allowing the ranchers to continue conducting their business while violating what would otherwise be water quality regulations. Melanie's response was that "water waivers" was an unfortunate term and that they should really be called "dairy permits" which take into consideration the inherent impacts of dairy. I asked for clarification, "You are saying that dairy permits are granted with the understanding that the very nature of the business violates water quality regulations so special exceptions are made for dairy operations?" The answer was yes.

That statement alone summarizes the real issue here; this is a game that entertains the idea that beef and dairy ranching can operate without harming the local ecosystem and natural resources. The reality is that beef and dairy operations are synonymous with damaging natural resources, so much so that they receive their own set of rules. There is no such thing as a marriage of wildlife and agriculture, there is only the political grey area that attempts to overlook the obvious with verbose misconceptions.

Without question there are rancher sympathizers on your staff who don't appreciate the above paragraph so let's go back to one focal point of this issue. Point Reyes National Seashore is meant to be operated with the highest level of protection for its natural resources. While boastful claims of being "models of sustainability" are spread in the media the reality is that the ranching in Point Reyes is a model for what not to do. In other words, even ranch supporters should be disturbed by what has been taking place in Point Reyes.

So after decades of mismanagement, after decades of ranchers proving over and over that they will take any shortcut they can and violate whatever they feel entitled to violate, the park service's reaction is to reward those ranches with 20 year leases and even more opportunities to expand their ranching activities? It's a bad joke to look at the actions of the park service in relation to the conduct of ranchers and conclude that the future holds improvements. No, a logical conclusion would be to expect even worse behavior operating with near impunity. Heck, they operate with impunity already. And the result was to be rewarded rather than punished.

You are called upon to provide leadership in a time where change is desperately needed rather than joining the ranks of those who refuse to take a stand against this ongoing and increasing threat to our coast.

Sincerely,

Skyler Thomas  
San Francisco

**Agenda Item Th6b: CD-0006-20 Consistency Determination by National Park Service for 2020 General Management Plan Amendment for Point Reyes National Seashore**  
**This is a comment to the staff report to this agenda item.**

Staff has recommended “conditional concurrence” to the consistency determination (CD) with the condition that the NPS provide the Executive Director a water quality assessment plan for review and approval before new leases with ranchers are finalized.

With the extent of inconsistencies noted by staff, continued inaction by NPS on prior inconsistencies and additional inconsistencies noted here, GMPA does not meet the requirement for “consistent to the maximum extent practicable” with the coastal act. Authorization of GMPA with “conditional concurrence” will exacerbate these unresolved inconsistencies. I strongly urge commissioners to **object** to the consistency determination.

The California coast pre-dates the existence of ranching communities in the park and the Point Reyes Act does not establish ranching as a purpose of the Seashore or mandate that ranching continue. Any ranch leases should include “such restrictive covenants as may be necessary to carry out the purposes” of the act. Any coastal development proposal presented to the commission should be evaluated in this context to preserve the coast as a priority over development activities, especially in a National Park.

The intent of the coastal act is to eliminate any activity that can endanger the natural resource, not to mitigate or leave unaddressed acknowledged destructive practices. Coastal Commission has an opportunity to take a decisive position to preserve and protect the California coast. It is my sincere hope that the commission will vote to object the consistency determination.

**Staff: The GMPA maintains or slightly increases public access opportunities**

This is an inaccurate conclusion. Fences in several locations inhibit access to the coast and public trails are blocked by gates. GMPA will construct an additional 35 miles of new fence to improve livestock management over the 20-year lease/permit term and NPS anticipates up to 5 fencing projects annually. Without a documented plan to where and how this additional fencing will be installed it is not possible to conclude that access will “slightly increase”. This is **inconsistent** with “maximum access” stipulated in Section 4 of Article X of the CA constitution carried out with Section 30210 and 30211 of the coastal act. Use of coastal areas for grazing as shown below is **inconsistent** with Section 30221 stating, *Oceanfront land suitable for recreational use shall be protected for recreational use*. Visitors to the park travel through the planning area to reach coastal destinations such as Drakes Beach, Tomales Point, and the Point Reyes lighthouse. While the roads used for traveling to these park destinations fall outside the coastal zone, visitors still enjoy the scenic quality of the planning area landscape while traveling along them but all they see are National Park roads lined with fences, trash and grazed barren land. This is **inconsistent** with Section 30251, *The scenic and visual qualities of coastal areas shall be considered and protected as a resource of public importance*.



Photo: Laura Cunningham



Photo: Jocelyn Knight



Photo: Jocelyn Knight

Cattle fences along Sir Frances Drake Boulevard towards Drake's Estero, in PRNS that restrict free public access to national park unit lands and estuaries

Cow grazing along the beach at Drake's Estero at a park visitor parking lot, Point Reyes National Seashore, July, 2020.

Livestock fences and infrastructure discourage coastal access and recreation to a large portion of the Point Reyes Peninsula. October 2020

Staff: Fencing and other habitat protection measures to protect special status species such as the western snowy plover would continue.

Fences do not protect Snowy Plovers from ravens that prey on nests on beaches. Destruction of snowy plover nesting habitats is **inconsistent** with Section 30240 that states that “*Environmentally sensitive habitat areas shall be protected against any significant disruption*”. USFWS (2002a) found that because of indirect impacts associated with increased raven numbers, renewal of permits for ranches in the planning area “may affect, is likely to adversely affect” the western snowy plover. NPS quotes that 75% of nests were preyed upon by common ravens and despite NPS efforts the raven population has not decreased and ranching barns are supporting the growth of the raven population. Consistency determination to sanction ranching diversification will further endanger the snowy plover.

Staff acknowledge that “*there would continue to be effects to habitats and species in the GMPA planning area resulting from continued ranching and cattle grazing, but such effects would not result in population-level effects to coastal species*”. Population studies have not been referenced to support this conclusion. What is the threshold for “population level effect” for the coastal act for a threatened species?



Photo: Skyler Thomas  
Ravens and Brewer's blackbirds feeding on grain in hay at a feeding area for dairy cows on Point Reyes National Seashore. Kehoe Dairy. August 2019

Staff does not believe that the GMPA as proposed is consistent with Coastal Act policies related to marine resources (Section 30230) and water quality (Section 30231),

Staff has made the “conditional concurrence” determination based on lack of water quality data since 2013 and prior available data concluding extremely high levels of fecal coliform (for years 2000-2013). With continued inaction by the NPS despite these findings, no documented plan mitigating the the problem of excessive cattle waste and manure disposal in creeks flowing into pacific ocean, the commission should find that the GMPA is not “consistent to the maximum practicable” and take a stronger position to **object** to the consistency determination. Staff have required a timeline, sampling methodology and monitoring plan from the NPS, but should also require that these water quality inspections meet specific metrics, are from an independent agency and that all reports be made public.

Staff: While air quality emissions would continue as a result of ranching activities, levels of such emissions would continue to be within air quality standards.

Acknowledging impact to air quality from ongoing ranching activities and allowing it to increase unmitigated seems to be a contrary strategy for an agency with a role to anticipate and avert damage. It has been shown that Nitrogen deposition exceeds critical load for one or more park ecosystems (NPS ARD 2018). Visibility in the park needs improvement to reach the Clean air Act goal of no human caused impairment (NPS). Ground level O<sub>3</sub> at 55.6 ppb (NPS 2018n) is of moderate concern for park visitors and staff especially those with heart/ lung conditions engaging in aerobic activities like hiking and biking. Under California law methane and Carbon dioxide are major GHG. CA bill SB No. 1383 require CARB, reduce methane emissions from livestock manure management and dairy operations and regulations and takes affect January 1, 2024. With PRNS ranches GHG emissions representing 21% of county agricultural emissions, what is the GMPA plan to meet regulated levels?

Radhika Srinivasan  
Walnut Creek, CA

December 29, 2020

Sent via email to: [PointReyesManagementPlan@coastal.ca.gov](mailto:PointReyesManagementPlan@coastal.ca.gov)

Dear California Coastal Commissioners and staff:

Please do NOT approve the National Park Service's (NPS) California Coastal Act "Consistency Determination" for the new Point Reyes National Seashore (PRNS) Plan at your January 14th meeting.

I am a former long-time California resident who collected signatures on the petitions that qualified the successful California Coastal Act initiative for the ballot and ultimate enactment. I have visited PRNS on several occasions, and I care deeply about its current and future protective management.

When PRNS was established, the clear intent was to phase out commercial livestock grazing. However, politically connected ranchers and their supporters have managed to frustrate this intent for many years. Now, thanks to the corrupt Trump administration, they are pressuring NPS to reverse course, more flagrantly ignore the original intent, and expand commercial livestock grazing while adding new farming activities. This is outrageous and a harsh betrayal to those who worked to get PRNS established.

As demonstrated by the vast majority of the thousands of public comments submitted, there is overwhelming opposition to the new NPS PRNS plan. People understand that this plan puts narrow private ranching and farming interests well above the broader national interest. PRNS may become a "national seashore" in name only when it is managed for ranching and farming and barely distinguishable from other private lands managed for those same purposes.

I understand that Coastal Commission staff properly recommended a major condition on any consistency decision: that the NPS provide a comprehensive plan



to address water quality problems before approving any ranching leases. Given the obvious threat to water quality in the coastal zone from nearby grazing operations, this condition is reasonable and necessary. However, the NPS cannot be trusted to fulfill this condition if the consistency determination has already been made and the final PRNS plan record of decision has been signed by Trump administration officials. It is no secret that the Trump administration and NPS are rushing to finalize and lock in this harmful PRNS plan before Inauguration Day on January 20. As such, they will likely say or do anything to meet this imminent deadline.

No one should gullibly rely on their short-term promises. Instead, the consistency determination should not be approved at the January 14 meeting, and the NPS staff should be directed to prepare and submit the comprehensive water quality plan prior to any subsequent consideration of Coastal Act consistency. After receipt of this NPS water quality plan, it should be available to the Commission and public for a reasonable review time. When this review process is complete, the Commission can decide whether the plan is adequate and enforceable to ensure that appropriate water quality standards in the coastal zone can and will be met over the long term. This review process would also give the incoming Biden administration officials the opportunity to review this plan to determine if they likewise believe that it is adequate.

The NPS PRNS planning process has spanned many years. There is no demonstrated need or urgency for the Coastal Commission to rush to judgment on this consistency determination. A few more weeks or even months are appropriate to provide enough time for the water quality and perhaps other PRNS coastal zone related issues to be sorted out.

While the Coastal Commission staff report properly dealt with water quality, I strongly believe that there are other issues where long-term implementation of the new NPS PRNS plan would likely result in adverse impacts in the coastal zone.

For example, prolonged drought from climate change poses a threat to the reliability of future surface and groundwater supplies. For PRNS, the proposed increases in ranching and farming operations would increase the diversion and use of water before it would otherwise reach the coastal zone. Greater water use during declining supply is a recipe for conflict. This reduction in PRNS water flow would affect both water quality and quantity in the coastal zone. It could allow salt water to encroach farther inland, change brackish marshes, hinder or eliminate instream flows, increase contaminant levels, and diminish sediment transport needed to maintain beach sand. This connection between water quality and quantity is important and must be adequately addressed to ensure that potentially affected coastal zone resources and values are protected.

The proposed increase in PRNR ranching and farming operations would also likely adversely affect both public recreational access and natural scenic quality in the coastal zone. Cattle can be dangerous and their presence would not only deter the public but also pose serious safety risks. And people don't want or need to visit a national seashore to see ranching and farming operations as those are ubiquitous throughout most of the West.

The Trump administration's corrupt NPS is trying to allow and expand 24 commercial ranching operations in a national seashore against the overall interests of about 40 million Californians and the 328 million Americans who actually "own" this seashore. This is a complete travesty. The California Coastal Commission should not do anything that would support, help, or expedite this travesty. Instead, the Commission should stand its ground and uphold its jurisdiction over the coastal zone on behalf of the public and consistent with the relevant laws and best scientific information.

Again, please do not approve the PRNS plan consistency determination and require NPS, at minimum, to prepare and submit their comprehensive PRNS water quality plan for Commission and public review prior to any further consideration of this matter.

I am counting on the Commission to not be bullied by the outgoing Trump administration NPS officials and to be receptive to working positively with the incoming Biden administration NPS officials to revise and improve the PRNS plan to ensure that water quality and other public resources and uses in the coastal zone are protected.

Thank you very much for your consideration.

Sincerely,

Richard Spotts

255 North 2790 East

Saint George Utah 84790

raspotts2@gmail.com

cc: Interested parties

**From:** Jerry Reiva <jerry.reiva@gmail.com>

**Sent:** Tuesday, December 29, 2020 10:39 PM

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

**Cc:** Craig\_Kenkel@nps.gov; Weber, John@Coastal <john.weber@coastal.ca.gov>

**Subject:** Please Vote Against Conditional Compliance

Hi California Coastal Commission,

I am writing to ask you to vote AGAINST the staff-recommended conditional compliance to the Point Reyes General Land Management Plan Amendment (GLMPA), and instead object to the National Park Service consistency determination, as it is not consistent with the California Coastal Management Plan.

The vote on the conditional compliance is scheduled for January 14th. That is just a few weeks after the staff report came out. The CCC received over 20,000 comments opposing the park's plan to continue commercial cattle operations within the National Park. Many of those comments contain scientific and technical data that will take longer to analyze than just a few weeks. And, we know more information is still being collected and submitted.

The CCC staff had requested until March 2021 to analyze information before issuing the report, but was denied by the National Park Service. They asked that the vote happen in January— denying adequate time for a proper assessment of their plan. It is not a coincidence that the vote will happen just a week before the current administration leaves office. Public lands are under attack, and Point Reyes seems to be one of them.

In addition, the staff report lacked sufficient data on other spillover effects from the Point Reyes GLMPA. For example, nothing about water quantity was addressed in the entire Point Reyes National Seashore portion of the planning area. Nothing about climate impacts from cattle was addressed. What about migratory birds? What about eelgrass and orcas? What about endangered salmon?

This is an important decision that will impact the California Coast for the next several decades, it is imperative to have all the relevant information, and enough time to analyze that information!

That's why it is important to vote against this compliance— there is simply not enough information, and not enough time to analyze it.

In California, we set the example of environmental integrity— so let's not rush our decision making process without proper analysis of all the information. Please vote against the conditional compliance on January 14. Thank you for taking the time to read this.

Sincerely,

Jerry Reiva

From: Belinda Burton <belinfcord@aol.com>

Sent: Tuesday, December 29, 2020 7:45 PM

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

Subject: Rule Elk

Please do not allow the Dairy and Beef Industry to expand their business efforts in Point Reyes. The elk are suffering because of selfish and greedy humans.

**From:** Cynthia Fernandez <cynfer61@yahoo.com>

**Sent:** Tuesday, December 29, 2020 7:24 PM

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

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

**Subject:** Tule Elk!

Hi California Coastal Commission,

I am writing to ask you to vote AGAINST the staff-recommended conditional compliance to the Point Reyes General Land Management Plan Amendment (GLMPA), and instead object to the National Park Service consistency determination, as it is not consistent with the California Coastal Management Plan.

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Let's do this right — let's keep our parks alive and ensure parks for all our residents.

This is not an issue we should rush through. In California, we set the example of environmental integrity— so let's not rush our decision making process without proper analysis of all the information. Please vote against the conditional compliance on January 14.

Sincerely,

Cynthia Fernandez

**From:** Beth Jones <beth.jones@inode.at>

**Sent:** Tuesday, December 29, 2020 4:22 PM

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

**Subject:** OUR TULE ELK are dying horrific deaths, for NO good reason. Implement Alternative F NOW!

To whom it may concern on the California Coastal Commission — and you had better start getting concerned:

<https://www.youtube.com/watch?v=ndXyAbe5rOg&feature=youtu.be>

It has meanwhile come to the nation's and the world's attention that your organization is sitting idly by, while the National Park Service once again happily plays dog-in-the-manger on behalf of a handful of profiteering cattle ranchers — actively and cruelly subjecting rare tule elk (OUR RARE TULE ELK!) to prolonged suffering and horrific deaths due to willfully inflicted thirst and starvation.

Just as the NPS did during the drought in 2013.

While YOU on the California Coastal Commission did — and continue to do — NOTHING.

These "rangers" from the National Park (Dis)Service are not only blocking the elk herd's natural routes to food and water sources in order to serve their selfish corporate masters (and not the American People as they are supposed to).

No, the ranchers' toadies are also refusing to feed and water these rare elk, and even forbidding and preventing private citizens (their actual bosses) from doing so instead. Moreover, the NPS is also IGNORING THE DEMANDS OF TENS OF THOUSANDS OF CALIFORNIANS, AMERICANS AND EXPATS LIKE ME TO CEASE AND DESIST THEIR DESPICABLE AND WILLFUL CRUELTY.

Maybe you don't care either that these innocent fellow creatures are suffering and dying as you read these words.

Maybe you are just as heartlessly mercenary as the cattle ranchers — who, I remind you, were paid for their land in 1962 when Point Reyes became a National Seashore. Which, I also remind you, belongs to the People — including the thousands of citizens who are TELLING YOU TO PROTECT OUR TULE ELK AND OUR PARK AND QUIT COVERING FOR THE SELFISH CATTLE RANCHERS and their toadies in the NPS!

You know full well that continuing to allow cattle to use our Seashore is not only deliberately despoiling a public treasure, it is at the cruel expense of iconic wildlife that lived there for centuries before these selfish profiteers did.

I agree wholeheartedly with Fleur Dawes, of *In Defense of Animals*, who stated:

*"The actions of the National Park Service speak loud and clear: private ranching business is favored over public opinion and the lives of native wild animals at Point Reyes National Seashore. .... Removing water from thirsty and dying, rare Tule elk is despicable. New plans to start shooting them are utterly disgusting. Bay Area residents overwhelmingly want these native wild animals protected over private interests."*

You and I both know that the ranchers do not own the Point Reyes's land they and their cattle are abusing, degrading and polluting. The ranchers sold their properties to the federal government for the equivalent of \$350 million in the 1960s when the National Seashore was established. Now they lease back the land (OUR land) at below-market rates, while the maintenance on their CAFOs (concentrated animal feeding operations) is funded by feloniously foisting the costs onto the taxpayers.

Taxpayers, like my family. And yours....

Photographers have documented and publicized more than 18 elk deaths in recent months.

<https://www.youtube.com/watch?v=xPa7apk6Ckw&feature=youtu.be>

These innocent elk died horrible, needless deaths due to the deliberate refusal of access to adequate water and forage during a drought that continued into December. **This year, the NPS not only refused to act but deliberately removed water from hundreds of majestic animals trapped in the unnatural and unjust elk reserve enclosure during the drought, forcing the animals to suffer for months.**

These needless deaths are only the most obvious of numerous, despicable, anti-wildlife and pro-industry policies that park rangers are enforcing at OUR Seashore, while their salaries are paid by our tax dollars.

Despite widespread public opposition, in September, the NPS released a so-called **management plan** (Alternative B) that would extend the extremely controversial beef and dairy leases for PRIVATE RANCHERS ON PUBLIC LANDS from five years to 20 years, in addition to expanding industrial operations inside this [national park](#), AND it would deplorably allow the shooting of native Tule elk.

And all against the will of the majority of nature-loving Californians, Americans and anyone anywhere with a lick of sense or morality or compassion.



O Hell No.

Millions of caring citizens vehemently oppose what is going on in our park. And what these caring citizens demand to know is:

- When is the California Coastal Commission going to finally help put a stop to the appalling pollution of coastal zones with cattle manure from CAFOs around the Point Reyes National Seashore?!
- When is the California Coastal Commission going to finally help put an end to the willful, greed-driven cruelty toward a threatened, native species?
- When is the California Coastal Commission going to finally put an end to the abuse of the public's property by undeserving ranchers and demand the enactment of the far more equitable and humane ALTERNATIVE F, instead of the NPS's obviously corrupt and thus unacceptable Alternative B?

Inquiring — and thus outraged — minds the world over want to know.

We await your reply at your earliest convenience.

We hope it will contain good news for our long-suffering native wildlife, both in and around our National Seashore.

Beth Jones  
Angry expat from Pacific Grove, CA 93950  
Rettenpacher Strasse 19A  
5020 Salzburg, Austria

From: biananinno@everyactioncustom.com <biananinno@everyactioncustom.com>  
Sent: Tuesday, December 29, 2020 9:47 AM  
To: Coastal Point Reyes Management Plan <PointReyesManagementPlan@coastal.ca.gov>  
Subject: Withdraw CalGEM Permits and Stop SoCalGas Activity at Ballona Wetlands

Dear Executive Director John Ainsworth,

As a person who cares about animals and one of over 250,000 supporters of In Defense of Animals, I'm appalled to hear about new gas activity at Ballona Wetlands Ecological Reserve without proper approvals from federal, state, and county agencies.

Recently, local residents noticed workers digging and drilling inside the Ballona Wetlands Ecological Reserve, just feet away from endangered Belding's Savannah sparrows.

SoCalGas claims to be abandoning these wells, but plans for this fake "restoration" project reveal that it is merely repositioning the gas wells right outside the ecological reserve to continue storing gas beneath the wetlands, in a process called "slant drilling."

The gas field will be the same size and equally dangerous to wild animals and the surrounding community. Continued gas operations at the wetlands counters new statewide orders to reduce climate impacts from fossil fuels.

The LA County Democratic Party has voted to stop injecting gas into the field below the Ballona Wetlands. Despite public opposition, SoCalGas received CalGEM permits to operate without a certified Environmental Impact Report or a full coastal development permit.

Please halt SoCalGas activity at Ballona Wetlands until adequate environmental review and permits are completed. Federal laws and the California Coastal Act must be followed. Tribal consultation is also required for this site.

Instead of bulldozing Ballona Wetlands, why not opt for Alternative 4 on the Environmental Impact Report, which is a more gentle approach that preserves the existing vibrant and diverse ecosystem?

Thank you for your consideration.

Sincerely,  
Ms. Biana Ninno  
32 Tanjoe Crescent Toronto, ON M2M 1P7  
[biananinno@rogers.com](mailto:biananinno@rogers.com)

**From:** sally sorensen <sjsorensen@msn.com>

**Sent:** Monday, December 28, 2020 7:25 AM

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

**Subject:** Point Reyes

California coastal Commission,

PLEASE reject the **NPS'** recommended management plan which expands this National Seashore's cruel beef and dairy operations at the expense of its wildlife, as well as polluting the area with fecal matter from grazing cattle.

Sally Sorensen

**From:** Marcia Mueller <marciamueller0000@gmail.com>

**Sent:** Sunday, December 27, 2020 6:42 PM

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

**Subject:** Stop cattle/dairy ranch expansion

Ranchers do not own the public land. Both land and wildlife are supposed to be held in trust by the government.

Many citizens are tired of government bureaucracies being the lackeys of the ranch industry. The NPS and the BLM need to stop killing wildlife to serve the ranchers.

What you're doing to the Tule elk should be a crime. I hope protesters will be the next invasive species to the area.

Marcia Mueller

Spokane, Washington

**From:** Joe Niehus <jpniehus@yahoo.com>

**Sent:** Sunday, December 27, 2020 10:06 AM

**To:** Coastal Point Reyes Management Plan <PointReyesManagementPlan@coastal.ca.gov>;  
nrdems@mail.house.gov; Craig\_kenkel@nps.gov; Joseph Niehus <jpniehus@yahoo.com>

**Subject:** RESTORE POINT REYES NATIONAL SEASHORE

To Costal Commission,

Hi, my name is Joseph Niehus and I am a lifetime resident of California and I am writing to ask you to protect the Point Reyes National Seashore.

Please preserve the wildness of this amazing area, I can't imagine we would kill Tule Elk in order to make more feed for cattle and profits for private corporations rather than preserve this PUBLIC treasure!

I think if it was brought back more like before cattle the public appreciation would be greatly improved.

Again, please don't allow further destruction of the land or the Elk Herd.

Sincerely,

Joseph Niehus

20154 Sweetbay Rd  
Riverside, CA 92508  
951-321-9597

Elizabeth Dodge  
710 Wildcat Canyon Road  
Berkeley, CA 94708

December 26, 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); 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 Commission Members:

The Coastal Commission staff have recommended a conditional consistency concurrence for the National Park Service General Plan Amendment for Point Reyes National Seashore to address surface water quality violations of fecal coliform and other pollutants emanating from ranches to Pacific coastal drainages. The specific staff recommendation is that the NPS provide the Executive Director with a water quality assessment plan for review and approval before new leases with ranchers are finalized. The water quality assessment plan would include the following elements:

1. Proposed overall strategy and timeline for assessing and improving water quality,
2. Proposed sampling methodology for collecting quantitative water quality data, and
3. A provision for NPS reporting of monitoring results and water quality analysis to the Executive Director of the Commission on an annual basis.

Merely developing and implementing a water quality sampling plan for the Coastal Commission does not in itself merit conditional concurrence because this approach has been used in the past and it appears the National Park Service did not honor a previous Coastal Commission request. Furthermore, it doesn't address what should happen if a rancher fails to meet water quality standards.

A 2001 PRNS Water Quality Report, (See Exhibit A) which found very high coliform levels in the Kehoe and Abbots Lagoon watersheds, contains the following statement:

The McClure dairy plans to construct a loafing barn . . . The California Coastal Commission has requested that water quality improvements are quantified. The Seashore staff will assist with monitoring to quantify pollutant levels currently leaving the impact areas, and will monitor the same locations once the loafing barn and waste management systems are completed.

The GMPA EIS states that a loafing barn was constructed at I Ranch (the McClure leased land) between 2004 to 2006. However, water quality standard exceedances appear to have continued

after 2006 and no reports to the Coastal Commission are in evidence in the extensive references cited in Appendix L (Voller, 2020) of the EIS. Furthermore, the National Park Service has apparently discontinued all water quality monitoring in 2013. Finally, none of the drainages in the two parks has been shown to meet the standards set by the SFRWQCB. Even Lagunitas and Olema Creeks, which have been the subject of a number of Best Management Practices (BMPs), are still “impaired for nutrients, pathogens, and sedimentation/siltation under section 303(d) of the Clean Water Act (SWRCB 2010).” GMPA FEIS at 75.<sup>1</sup> This indicates that in addition to the recommendations of Coastal Commission staff, the conditional approval should also include:

- An analysis of the causes of water quality impairment,
- A description of additional actions that will be taken to ensure compliance with water quality standards,
- Documentation of implementation of actions,
- Follow up water quality monitoring to determine the effectiveness of the additional actions, and
- A description of the enforcement actions the NPS will take, including termination of leases, if the ranchers continue to fail to comply with water quality standards. All reports should be made available for public review and comment on the NPS and CCC web sites.

Sincerely,

Elizabeth Dodge  
Environmental Scientist  
Berkeley, CA

<sup>1</sup><https://parkplanning.nps.gov/document.cfm?documentID=106632>

Exhibit A - Screen shot of Page 60 from PRNS Water Quality Monitoring Report May 1999 – May 2001 (Brannon J Ketcham, November 2001) (highlight added)

**Table 11. Kehoe and Abbotts Lagoon Watershed Site Information**

Site**	Sample Events	Water Temp C	pH	Specific Conductance @ 25 C	Toxic Ammonia Events	Mean Fecal Coliform ^ (MPN/100 ml)	Maximum Fecal Coliform (MPN/100 ml)	90 <sup>th</sup> Percentile Fecal Coliform #	Mean TSS (mg/l)	Max TSS (mg/l)	90 <sup>th</sup> Percentile TSS
PAC1 South Kehoe	12	11.5	7.6	453	0	158,079	>1,600,000	153,000	113	716	271
PAC2 North Kehoe	12	11.5	7.8	582	0	154,058	1,600,000	147,000	138	471	317
PAC2a North Kehoe within in dairy complex	3	11.3	7.9	1,126	0	710,000	1,600,000	1,380,000	171	292	266
ABB1 Abbotts Perennial	9	10.6	7.6	252	0	10,878	35,000	26,200	26	56	43
ABB2 McClures	2	11.9	7.3	342	0	20,000	24,000	23,200	19	20	20

\*\*See Map 7 for site locations

Non-Contact Human Health Standards

^ mean <2,000 MPN/100ml

#90<sup>th</sup> percentile <4,000 MPN/100ml

#### *Future Monitoring in the Kehoe and Abbotts Lagoon Watersheds*

It is clear that the North and South Kehoe Creek watersheds are significantly impacted by the dairy operations. Existing levels of monitoring should be continued in future years. As opposed to the Drakes Bay situation, low levels of ammonia are allowing for significant aquatic productivity. The lower portions of these streams are highly productive marsh systems, likely driven by nutrient loading from the operations. The Recreational Water Quality Monitoring Program will begin sampling the beach interface during summer 2001.

The McClure dairy plans to construct a loafing barn to house nearly all of the milking herd during the winter. The California Coastal Commission has requested that water quality improvements are quantified. The Seashore staff will assist with monitoring to quantify pollutant levels currently leaving the impact areas, and will monitor the same locations once the loafing barn and waste management systems are completed.



**From:** Sandra Zelasko <slzphoto@sbcglobal.net>

**Sent:** Saturday, December 26, 2020 7:06 PM

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

**Subject:** Restore Point Reyes National Seashore

Restore Point Reyes National Seashore! It is time to do the right thing for Californians, visitors and especially the wildlife of this abused park in our beloved National Park system.

The California Coastal Commission's (CCC) decision is narrowly focused on water quality. Additional spillover impacts not addressed, including air quality and climate impacts linked to cattle (the number one source of greenhouse gasses at the Seashore); water quantity—(there already are water shortages and demand for water will only increase once more livestock and commercial crops are introduced under Alternative B. In addition, the loss of public access to the coast as a result of special uses is at odds with the CCC's commitment to inclusion and social justice.

In denying the CCC staff's request to extend the review of the Consistency Determination until March 2021, the federal government has denied the Commissioners the time to fairly analyze and evaluate how 24 commercial ranching operations in a national park that belongs to 328 million Americans will impact coastal resources that belong to 40 million Californians.

LETS GET THIS RIGHT! NOW! RESTORE POINT REYES NATIONAL SEASHORE!

Thank you,

Sandy Zelasko

Valley Center, CA 92082

**From:** Heidi and Mark OBrien <markheidiob@verizon.net>

**Sent:** Saturday, December 26, 2020 3:46 PM

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

**Subject:** Tule elk

I'm urging you to reject **the** NPS' proposed management plan, as the plan expands the National Seashore's cruel beef and dairy operations at the expense of its wildlife. PLEASE do the right thing!

Thank you,

Heidi O'Brien

From: **Michael Warburton** <[warburto@sonic.net](mailto:warburto@sonic.net)>

Date: Sat, Dec 26, 2020 at 1:58 PM

Subject: FW: Coastal Commission Narrowly Addresses Impacts at Point Reyes - Next Steps

To: Laurie Koteen <[laurie.koteen@gmail.com](mailto:laurie.koteen@gmail.com)>

Laurie,

Thanks for taking a “business” concern during a holiday. Here is the e-mail that came through my in-box. I just thought the Coastal Commission staff should be aware that the California Public Trust Doctrine is relevant and applicable to the “consistency” determination coming up January 14. The longstanding law is that the public interest (jus publicum) cannot be transferred by implication (California Fish Co, 1906, California Supreme Court with MANY consistent cases). The California Legislature must express explicit intent to transfer the interest and this has never happened. The 1983 Mono Lake Decision updated this understanding and requires California Agencies to consider the public trust whenever they “plan for” or develop Public Trust Assets. We are at a “crossroads” concerning legal assumptions about “current status” of many legal titles. The assumptions being made about what sort of title the ranchers in Point Reyes National Park hold is VERY questionable. The Commissioners must be made aware of this uncertainty before they “vote.”

Best,

Michael Warburton

Executive Director

Public Trust Alliance

**From:** Maggie Rufo <magwhls@comcast.net>  
**Sent:** Saturday, December 26, 2020 1:41 PM  
**To:** Coastal Point Reyes Management Plan <PointReyesManagementPlan@coastal.ca.gov>  
**Cc:** nrdems@mail.house.gov; Craig\_kenkel@nps.gov  
**Subject:** Point Reyes National Seashore NPS Plan

Dear Commissioners,

The National Park Service Plan for OUR Point Reyes National Seashore. Is unacceptable. There must no expansion of ranching, no addition of allowable animals to farm and NO killing of Tule Elk. The needs of the NATIONAL seashore's wildlife must be the number one priority in all things. Those who ranch there now must not expand and if future generations do not want to farm then the land should go back into wilderness.

Please do not enable the Trump administration's ongoing plans to destroy lands that belong to the American people. Please at least withhold your decision until later next year after the new administration has had a look at this misguided plan.

The people in charge of our lands, under Trump, are not qualified to make these kinds of changes.

Thank you for hearing my comments.

Maggie Rufo

Novato, CA

Please protect coastal and marine resources and public access at California's Point Reyes National Seashore.

From: Gary Scales <garrettscales@comcast.net>

Sent: Saturday, December 26, 2020 12:19 PM

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

Cc: nrdems@mail.house.gov; Craig\_kenkel@nps.gov

Subject: Point Reyes National Seashore

How can a handful of commercial ranching operations be given preference over a national park that belongs to the people of the United States and impact the California coastline which should be open to all citizens? These families were paid fair market value for their ranches fifty years ago with generous provisions of life estates and below market lease rates now for generations. Why should they now be given more? They aren't contributing anything significant to our economy while denying the property owners, who are the people of the United States to right to enjoy the land. If the plan for long-term leases continues there will be boutique bed and breakfasts run by Airbnb all over the Park.

I am in my eighties and remember well the negotiations. I used to hike, fish, hunt and camp all over Point Reyes. I have seen now our beautiful park dispelled by cattle that pollute the water and cause killing runoff into Tomales Bay and the Pacific Ocean. Politicians have been manipulated with hidden agendas and unscrupulous attorneys.

Please do not give out any ranch leases or expanded the current usage until there is a comprehensive plan to address water quality issues.

Respectfully yours,

Garrett P. Scales

Ross, CA

**From:** Cathe Moody <cathemoody@gmail.com>

**Sent:** Saturday, December 26, 2020 2:04 AM

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

**Subject:** Have Heart

I am so sad to see you have removed all water from the tule elk. You are killing them slowly and cruelly. We do not need more cows or grazing land. WE NEED KINDNESS. PLEASE, HAVE HEART.

Always, in kindness.

Cathe Moody

[916.624.0322](tel:916.624.0322) | [CatheMoody@gmail.com](mailto:CatheMoody@gmail.com)

<https://www.facebook.com/LookWhatBeautyGodMade>

**From:** Rique <riqueramirez1984@gmail.com>

**Sent:** Friday, December 25, 2020 2:47 PM

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

**Subject:** Point Reyes Tule Elk

Hi,

I have been following the story of how the Tule elk have been essentially dying off due to lack of access to water and foraging. I am writing you to encourage you to REJECT the National Park Service's recommended management plan that expands the National Seashore's cruel beef and dairy operations at the expense of wildlife. The wild native Tule elk should be given preference over private animal agriculture, especially given how I've read about cows damaging the land and polluting soil, waterways and the Pacific Ocean.

Reach into your heart and find the compassion needed to make this happen. It's not hard.

-Rique Ramirez, San Diego, CA

From: Timothy Stanton <tkeelst@aol.com>

Sent: Friday, December 25, 2020 1:25 PM

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

Subject: Point Reyes Management Plan

Dear Commissioners:

I write to express my sincere and strong hope that you will delay consideration of the Management Plan for Natural Resources at Point Reyes National Seashore. From what I have read it seems clear that the Plan is incomplete, lacking specific detail and definitions, omitting important, possible areas of impact. The Plan's deficits are numerous, but to name a few: there is no evaluation of streams and wetlands in environmentally sensitive areas; there is no assessment of impacts of proposed diversification of agricultural activities including some that do not appear to be agricultural (e.g., short-term guest accommodations); the plan for handling ranches when families with existing leases no longer wish to operate them is vague and could potentially lead to activities that do not belong in the Seashore as enacted by Congress.

This Management Plan needs further research, review and public discussion. I therefore hope you will delay consideration. What is the need to rush this process?

Thank you very much for listening. I very much appreciate the long, important work of the Commission.

Sincerely,

Timothy Stanton  
Inverness, CA



**From:** Cat Mom <ginaward2000@gmail.com>

**Sent:** Friday, December 25, 2020 8:08 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:** Elk

You have asked for comments and suggestions yet you continually ignore the surroundings community for the elk. Why bother at all? I am sure you have deemed it appropriate for fascist behavior, since you insist on not hearing the voice of the people.

I don't know what kind of vermin you are that feels it is appropriate to watch elk die of thirst or that the cattle ranches are on public land destroying what is supposed to be a park. WHAT IS WRONG WITH YOU?

From: pilsungforme@gmail.com <pilsungforme@gmail.com>

Sent: Thursday, December 24, 2020 6:20 PM

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

Subject: Tule Elk

Stop expanding ranching and follow the will of the people and save the elk

Sent from my iPhone

**From:** Elena Mavros <pidinc@aol.com>

**Sent:** Thursday, December 24, 2020 1:27 PM

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

**Subject:** Reject NPS's management plan

Dear California Coastal Commission, I would like to take this opportunity to encourage you to reject the **NPS'** recommended management plan which expands this National Seashore's cruel beef and dairy operations at the expense of its wildlife.

Elena Mavros

Sent from my iPhone

**From:** Adriana Kolev <adrianakolev@gmail.com>

**Sent:** Tuesday, December 22, 2020 4:36 PM

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

**Subject:** Prioritize our public lands over private interests!

Hello,

My name is Adriana Kolev and I am a Bay Area local. I am very disturbed by the current standings of the Tule Elk in Point Reyes. I am well aware of the effects on the Tule Elk due to the gargantuan fencing on behalf of private cattle ranchers in the area- preventing Tule Elk from reaching vital water resources.

This is public land and the priority should be in keeping it as healthy, clean, and bio diverse as possible. The fact that there is any private leasing for animal agriculture on this land is deplorable and clearly shows corruption in the governing agencies and political figures, but the current standing where Tule Elk are suffering of thirst and perishing is completely cruel.

The effects of the animal agriculture in Point Reyes have led to toxic, anaerobic conditions in water bodies in the area, and is contributing to air pollution at an aggressive rate. It is simply not sustainable and a complete misuse of our public lands. We should be phasing out cattle from the area, not bending over backwards to accommodate cruel practices at the expense of native wildlife.

PLEASE, I urge your team to be on the right side of history and stop perpetrating this cruelty and corruption.

Thanks,

Adriana

**From:** Joan Kresich <joankresich@gmail.com>

**Sent:** Tuesday, December 22, 2020 11:51 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:** Option 7 for Pt Reyes

Hello,

This Is a time when our democracy is floundering. Please, listen to WE the PEOPLE!

**We want option 7!**

Our national seashore should not support industrial agriculture.

The dairy operations are in DIRECT CONFLICT with caring for the fauna and flora of the national seashore. Culling rare tule elk to favor cows underscores this!

The land and water degradation of the dairy operations are tragic and make a mockery of the "protected" status this park deserves.

The blatant erosion caused by the dairy operations so plainly visible to all means water pollution and the waterways carry their pollution to the Pacific.

In the times of increasing impacts caused by the climate emergency, it is even more critical that our few truly protected lands are indeed protected.

**I implore you to listen to the 90% of us who want the dairy operations to make good on their earlier promises to move off this public land.** They've had decades to do the right thing, along with an earlier pay out. It's time for them to go.

Sincerely,

Joan Kresich

*"All flourishing is mutual."* Robin Wall Kimmerer

**From:** Donna Mansour <[donnalynnem@yahoo.co.uk](mailto:donnalynnem@yahoo.co.uk)>

**Sent:** Monday, December 21, 2020 8:35 AM

**To:** Ainsworth, John@Coastal <[John.Ainsworth@coastal.ca.gov](mailto:John.Ainsworth@coastal.ca.gov)>

**Subject:** Please reject National Park Service plan to expand ranching in Point Reyes

Subject: Please reject National Park Service plan to expand ranching in Point Reyes

To: <[PointReyesManagementPlan@coastal.ca.gov](mailto:PointReyesManagementPlan@coastal.ca.gov)>

Cc: <[John.Weber@coastal.ca.gov](mailto:John.Weber@coastal.ca.gov)>, <[Carey\\_feierabend@nps.gov](mailto:Carey_feierabend@nps.gov)>, <[Craig\\_Kenkel@nps.gov](mailto:Craig_Kenkel@nps.gov)>

Dear California Coastal Commission officials,

I am asking you to step up and use your power to intervene on behalf of our beautiful coastal ecosystem in California. As you know, the National Park Service has proposed the expansion of ranching activities at Point Reyes National Seashore. The native Tule elk, already suffering dehydration due to no water source and lack of habitat due to the prevalence of ranching, will be squeezed to the brink of extinction under this new plan.

I come to the seashore every month to see wildlife, native tule elk, elephant seals, salmon runs, and lush coastal prairies with native flora. What I instead see are too many cattle, manure piles, miles of fencing, barren land, and soil erosion. All of this erosion and manure pollution is also likely harming coastal marine life and is unsustainable. It is not furthering the mission of the Coastal Commission and violates Article 4 ("protection of the marine environment, including water quality issues, wetlands protections").

Related, I often see the cow manure getting into the creeks, and sometimes the park service will close the beaches because of the severe manure pollution. The smell can be overwhelming at times. In addition to the closures and stench, 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. This is a violation of Article 2: "development shall not interfere with the public's right to access the sea and coastal beaches."

This is a national park. It ought to be the most protected land on the planet, but we're allowing ranchers to spread liquid manure on the ground and impact this very sensitive ecosystem. When it rains, that runs off into the water and turns into algae blooms that chokes off life in the sea – in the Greater Farallones National Marine Sanctuary. Doing that anywhere is inexcusable, but to allow it to occur where it affects migrating whales is a real disgrace on California. We have an incredible opportunity to protect the seashore and ensure it is protected for future generations. Please do the right thing and reject the National Park Service's plan to expand ranching in Point Reyes.

Kind regards,

Donna Mansour (lover of Point Reyes)

**From:** Nadine Mansour <nadinezm@gmail.com>

**Sent:** Monday, December 21, 2020 8:16 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:** Please reject National Park Service plan to expand ranching in Point Reyes

Dear California Coastal Commission officials,

I am asking you to step up and use your power to intervene on behalf of our beautiful coastal ecosystem in California. As you know, the National Park Service has proposed the expansion of ranching activities at Point Reyes National Seashore. The native Tule elk, already suffering dehydration due to no water source and lack of habitat due to the prevalence of ranching, will be squeezed to the brink of extinction under this new plan.

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Related, I often see the cow manure getting into the creeks, and sometimes the park service will close the beaches because of the severe manure pollution. The smell can be overwhelming at times. In addition to the closures and stench, 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. This is a violation of Article 2: "development shall not interfere with the public's right to access the sea and coastal beaches."

This is a national park. It ought to be the most protected land on the planet, but we're allowing ranchers to spread liquid manure on the ground and impact this very sensitive ecosystem. When it rains, that runs off into the water and turns into algae blooms that chokes off life in the sea – in the Greater Farallones National Marine Sanctuary. Doing that anywhere is inexcusable, but to allow it to occur where it affects migrating whales is a real disgrace on California. We have an incredible opportunity to protect the seashore and ensure it is protected for future generations. Please do the right thing and reject the National Park Service's plan to expand ranching in Point Reyes.

Kind regards,

Nadine Mansour (lover of Point Reyes)

**From:** Noah Gresham-Lancaster <sojournerseal@gmail.com>

**Sent:** Sunday, December 20, 2020 8:06 PM

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

**Subject:** (Private party) save the cows, save the elk.

One of the major issues facing the tule elk is water shortages.

It will be easy to realize a better ecosystem when the cow families are reunited and promised from humans land provided as a home for them.

In this way, water will cease to be tainted. As the natural water of tule elk will be more easy to access. Water problems have not occur by the life and happiness of cows, but by the death of them.

Too long have we seen the economic system as a means to perpetuate female cows as service animals. Cow babies as without need of their mothers or disposable, and cow bulls as unworthy of emotional life, leading to their slaughter.

The spirit of people shrouded by an economy which allows baby cows to be confined, and never to receive adequate care from mother. Separating the parents.

Cow bulls must be identified as sentient people and given an equal chance at life with their mating partner and children. If this is deemed impossible; its time to stop the (present) economy and unite cow families.

In this way it will be possible to enlighten the situation and protect the tule elk. Everyone wants this. Find the opportunity and help protect cows for the simple value of their natural beneficial lives. And you will have the better future which everyone is fighting for and believes in.

Thank you



**From:** Katy Fendrich-Turner <katyfendrich@hotmail.com>

**Sent:** Sunday, December 20, 2020 4:55 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:** California Coastal Commission

Dear California Coastal Commission, I am hearing more news reports that you're allowing ranchers and the National Park Service to receive preferential treatment over private citizens? I am concerned our coastal access at Point Reyes National Seashore is allowed to be blocked by hundreds of miles of cow fencing, barbed-wire, and herds of cows? This is public land as far as I know. The water pollution at PRNS is severe - what are you all doing about the manure pollution? I visit CA to see wildlife, native tule elk, elephant seals, and whales. What I saw when I visited last year were too many cows, manure piles, and erosion. You are permitting manure pollution to harm CA coastal marine life. This is not furthering the mission of the Coastal Commission, can you help me understand what you all are doing to remedy the issue of cow fencing and cows have priority placement over us visiting the CA coast?

I appreciate your time.

Thank you,

Katy

Katy Fendrich-Turner

Austin, TX

From: tomak66@everyactioncustom.com <tomak66@everyactioncustom.com>  
Sent: Sunday, December 20, 2020 12:15 PM  
To: Coastal Point Reyes Management Plan <PointReyesManagementPlan@coastal.ca.gov>  
Subject: 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.

Sincerely,  
Mr. Thomas Avery  
3013 Lynnwood Way Louisville, KY 40299-3101 [tomak66@aol.com](mailto:tomak66@aol.com)

From: Robert LaPorta <rrolaporta@sbcglobal.net>  
Sent: Saturday, December 19, 2020 9:34 PM  
To: Coastal Point Reyes Management Plan <PointReyesManagementPlan@coastal.ca.gov>  
Subject: Point Reyes Management Plan B

Point Reyes National Park is a national park--we all know this. What is beyond reason is that in this national park , dairy and ranching is still alive and well!

When this area was designated protected by the National Park Service, the preservation of the environment and the wildlife was not just a good move or a gesture--but a commitment to be a good steward of the land, The presence of cows represents a breach of commitment to the preservation of parkland. This land has been trampled and the natural pasture growth destroyed. Massive amounts of manure has poisoned creeks and the sediments seep in to the ocean polluting it. Our wild place is likened to a giant sewer--unwelcoming to even unwild creatures such as ourselves. (Article 5)

A disturbing issue that the dairy ranchers on PRNS land view Tule elk's presence there as a nuisance. not as the majestic animals that they are. They see the elk as intruders on the land. Then, the idea that the Tule are disposable is a tragic stance. Our Tule elk are immeasurably suited to this environment--they are creatures with great natural ability to preserve the land for future generations. (Article 4, 5)

People--we populate our space, fill it with our business, our vehicles, our buildings. But--then we need a place away from it all--a wild open space to rejuvenate, to breathe freely, In Marin (we arrived here 47 years ago), for our family, it's always been PRNS. Our favorite beaches, hiking trails, the drive alone to get to these spots. (Article 3)

I sincerely believe we are at a watershed moment to understand what is a stake, to see the necessity to remove and keep out the dairy industry, any industry, from our national parks. I hope you will consider the Measure B the Park Service opts for is not even close to the best interest of the public lands. Measure F will work for the good of all.

Thank you for this input opportunity.

Rose Marie LaPorta  
50 San Gabriel Drive  
Fairfax, CA 94930

Sent from my iPhone

From: Lorena Rodriguez <acimut2303@gmail.com>  
Sent: Saturday, December 19, 2020 8:48 PM  
To: Coastal Point Reyes Management Plan <PointReyesManagementPlan@coastal.ca.gov>  
Subject: Point Reyes Management Plan

To whom it may concern,

I'm writing this letter in regards to the General Management Plan Amendment drafted by the NPS at Point Reyes Seashore because I find it outrageously wrong that a place with such a wide wildlife diversity (and one of the last in the California coastline) be destined to ranching. This action shows nothing but a shameful lack of commitment to the environment, the community and the future generations. Granting permission to a few private businesses to destroy one of the most beautiful places of the western coastline is beyond shameless and obviously not in sync with the demands of the 21st century in terms of protecting places with high biodiversity.

I consider a shame for Point Reyes, for Marin County, for the State of California to allow the National Park Service put their Plan Tinto effect since it goes against the urge for preserving our natural environment. It is a scientific fact that ranching contributes to the loss of topsoil, contamination of waterways, destruction of native flora and fauna, and that it exacerbates climate warming.

I am optimistic that the Commission will consider this responsibility very seriously and that the common sense will prevail when making a decision, for the wellbeing of not a few businesses but for that of millions of Californians who deserve to enjoy this part of the State for the years to come.

In the hope of a positive response to this matter, I remain.

Yours truly,

Lorena Rodriguez

**From:** PATRICIA RAVEN <palomaraven@comcast.net>

**Sent:** Saturday, December 19, 2020 7:43 PM

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

**Subject:** Tule Elk

Dear Commission, I am writing to you to request that you consider a plan for Point Reyes that excludes the killing of the Tule Elk. It is time to phase out cattle ranching from our National Seashore. I know you must be very aware of the destruction and pollution created by the cattle industry. This is contrary to the intent of preserving wild places for all to enjoy for generations. Please step up, spare the lives of our beautiful Tule Elk and phase out ranching. Thank you, Patrica Raven

P.O. Box 180

Camp Meeker, Ca

95419

**From:** MARK DARLEY <markdarley@mac.com>

**Sent:** Saturday, December 19, 2020 7:07 PM

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

**Subject:** General Management Plan Amendment for Point Reyes National Seashore

I have been visiting the Point Reyes National Seashore for 40 years. I now live much of the time in Inverness on the edge of the park.

I grew up on a farm in the UK within the New Forest, a National Park in the UK. In order for farmers and deer to coexist, the deer have been culled for 1000 years in carefully regulated and professional manner, and the local population have benefitted from the venison. Without this management, and with no predators, they would have become a major pest degrading the land, damaging the forest, ruining the farmers and suffering from starvation and uncontrolled illness. Managed, the herd is healthy and the farms and woodland productive.

Ranches and managed wildlife coexist in other National Parks in America. I am pleased to see that there is a practical plan to allow the Historic Ranches on Point Reyes Seashore to continue to operate. Long term leases are necessary for them to manage the land in responsible ways which has not been possible with short term leases. These ranches and the families who work on them are an integral part of the community of West Marin producing needed local food security, and jobs. The prior unmanaged growth of the elk herd was neither good for the health of the elk, nor for the beef and dairy cattle. Without natural predators there is no natural limit on the growth of the herd, nor is there natural selection of the sick and weak to promote a healthier elk herd.

Members of the public who object to the management of the size of the elk herd have a romantic and impractical view, and fail to recognise the value of the ranching community and the food security they produce for Marin County. They are frequently city dwellers with no practical experience of the land who see the elk as oversized "Bambi". Farmers have been sustaining real financial harm from the uncontrolled grazing of the elk on the lands they have been leased. Relocation or culling of some elk as necessary will improve the situation and will in no way reduce my enjoyment of the park. Please continue to support the ranching community while promoting the management and health of the elk herd. The two can be compatible.

Sincerely,

Mark Darley

Mark Darley  
[markdarley@mac.com](mailto:markdarley@mac.com)

311 Seymour Lane  
Mill Valley  
CA 94941, USA  
Cell: 415-310 5252

and

1 Gatcombe House  
Littlehempston  
Totnes Devon TQ9 6LW  
UK  
Cell: +44 (0)7572 180117

**From:** Barbara Littleford <barbara.littleford@gmail.com>

**Sent:** Saturday, December 19, 2020 5:37 PM

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

**Subject:** Tule Elk and Pt. Reyes

California Coastal Commission:

I am feeling frustrated as the deadline to have a letter to you on this topic is less than one week before Christmas. So I hope you will read my letter and include it with the others you have surely received.

I am a member of the environmental group 1000 Grandmothers. We want to support efforts to maintain and improve the earth for our children and their children (and all children in the future). I am also a member of Indivisible, which actively supports candidates who have progressive goals, such as environmental preservation and controlling climate change.

It is your civic and moral duty to protect the beautiful land and precious wild creatures at Pt. Reyes. The Tule Elk, the elephant seals and other wildlife should be preserved. Many visitors come to see them. They do not want to see the magnificent Tule Elk dying because of fencing that prevents access to water and food! They do not want to come and see mile after mile of cattle, fencing and droppings. They do not want to be barred from beach access, which I believe is illegal in the State of California, because of miles and miles of fencing.

I was so sad and disappointed to hear about the situation with the Tule Elk in particular. Are you beholden to the cattle ranchers? Or to the rest of us? We certainly do not need more beef. People are eating less and less of it as time goes on, alternatives become available and the health benefits of other sources of protein are proven. We don't need more cattle. We DO need as many Elk as we can preserve for future generations.

I would kindly request a reply to my letter.

Sincerely,

Barbara Littleford, MEd

(510) 220-4162



**From:** Therese Horsting <raventh9@gmail.com>

**Sent:** Saturday, December 19, 2020 4:26 PM

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

**Subject:** Save the elk

I recently received a plea from a friend of mine in our Democratic Club regarding the elk issue. I'm probably too late for comments but still would like to urge everyone to protect the elk who now play such an important and beautiful role on the coast. Yes, they weren't originally native to the area but neither are people - and yes, the ranchers have their issues and rights but they have to stop polluting all the streams and making it difficult to access the coast. There is probably a happy medium but we need to stay on what's best for the environment and Pt. Reyes National Seashore.

I live in Cotati so technically I'm not a local but I cherish every bit of nature we have around Sonoma and Marin - we are so lucky to have this incredible treasure at Pt. Reyes so hope you can find a more equitable solution and keep the elk around.

Warm Regards,

Therese

**From:** Jeanine Strobel <jestrobel12@gmail.com>

**Sent:** Saturday, December 19, 2020 1:27 PM

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

**Cc:** Craig\_Kenkel@nps.gov; Carey\_feierabend@nps.gov; Weber, John@Coastal  
<john.weber@coastal.ca.gov>

**Subject:** Comments on the Point Reyes National Seashore

Dear California Coastal Commission,

Thank you for your work protecting our beautiful California Coast. I am a native San Franciscan; my family lived in the Richmond District near Ocean Beach. I have loved the coast since I was a child and always knew how lucky I was to grow up near the ocean. My father and I went up to Point Reyes on weekends; I have always believed this is one of the most beautiful places on earth.

As an adult, my love of nature continues to grow. I have hiked in Point Reyes with the Sierra Club, Point Reyes Field Seminars, the Audubon Society and birdwatching classes through the College of Marin. I consider Point Reyes to be a sacred place and the wildlife there precious.

There are 50 species of animals and 900 kinds of plants that are listed as rare, threatened or endangered at the Point Reyes National Seashore (PRNS). With less than 5% of coastal prairie habitat left in California, the PRNS gives us an opportunity and responsibility to protect this endangered ecosystem.

I know the Coastal Commission advocates for “protections for environmentally sensitive habitat” according to Article 5 of the Coastal Management Act.

I believe allowing private cattle ranches to operate their businesses on 30% of our national park land is in conflict with the aspirations of the California Coastal Commission. I am strongly opposed to the National Park Service, not only supporting these for-profit ranches in the park, but allowing the killing of the native Tule Elk if they “interfere” with the ranch’s interests.

The grazing cattle are causing tremendous damage to the endangered wildlife and sensitive habitat of our PRNS. Please, find the NPS plan to continue allowing ranching in the park to be incompatible with the California Coastal Act and the purpose of having protected national parks.

Again, thank you for your service to protect our environment,

Jeanine Strobel

427 Enfrente Road, #B

Novato, CA 94949

**From:** mlovett18@comcast.net <mlovett18@comcast.net>

**Sent:** Saturday, December 19, 2020 10:55 AM

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

**Subject:** Protection of Point Reyes National Seashore

Please REJECT plans to expand private ranching in the Point Reyes National Seashore due to significant issues related to public access of national land, environmental protection, and the protection of Tule Elk. These concerns are fully within the Commission's purview under the Coastal Zone Management Act.

Too much of the Point Reyes coastal public lands are currently behind barbed wire. Ranching has limited our use of the land which lies barren and covered with 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.)

The ranches in the Point Reyes National Seashore bear no resemblance to historical ranches – they obscure that legacy and the true story of our land. Today, the history of the ranches can only be experienced through the old Pierce Point Ranch that the NPS maintains.

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 significantly outnumber the Tule Elk, which is a species only found in California. Elk have died during droughts and have not been adequately protected under NPS plans. They should not be culled by the National Park Service. The difference between the ranches and the Tule Elk preserve are striking, yet it is all public land that should be protected.

We go to Point Reyes to experience nature and enjoy the coastal views. (Management Act, Ch. 3, art. 6.). Private ranches operating on public land are detrimental to this experience.

Point Reyes is critical to teaching my grandchildren and future generations about our coastal wildlife and ecology. Please active embrace this responsibility and protect our public land on the California coast.

Marion Lovett

85 Taylor Drive

Fairfax, CA 94930

415 259-9136

[Mlovett18@comcast.net](mailto:Mlovett18@comcast.net)

**From:** Ari Olroyd <agolroyd@gmail.com>

**Sent:** Saturday, December 19, 2020 9:28 AM

**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:** Point Reyes

Hello,

I'm a resident in the East Bay and I love going to Point Reyes. However, it is disgusting to me how the land is being used. There should be no ranching allowed so close to the ocean and public resources. Saving the Tule Elk that LIVE there should be a number 1 priority. Cattle and ranching have no place in Point Reyes!

Article 2 — development shall not interfere with the public's right to access the sea and coastal beaches

Private land obstructs the public's RIGHT to access the sea and beaches.

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

Ranchers are being protected over recreation.

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

Ranching is ruining the natural resources. Point Reyes smells like manure.

Article 5 — protections for environmentally sensitive habitat

Cattle DO NOT belong on Point Reyes, it is not their natural environment. They are ruining the ecosystem by living there.

Article 6 — protection of coastal views

Would love to see unobstructed coastal views instead of farming animals being mistreated and buildings that are falling down.

Ranching must stop at Point Reyes! Restore Point Reyes to its natural state!

Sincerely,

Ari Olroyd

From: rcnorman@everyactioncustom.com <rcnorman@everyactioncustom.com>  
Sent: Saturday, December 19, 2020 4:26 AM  
To: Coastal Point Reyes Management Plan <PointReyesManagementPlan@coastal.ca.gov>  
Subject: Withdraw CalGEM Permits and Stop SoCalGas Activity at Ballona Wetlands

Dear Executive Director John Ainsworth,

As a person who cares about animals and one of over 250,000 supporters of In Defense of Animals, I'm appalled to hear about new gas activity at Ballona Wetlands Ecological Reserve without proper approvals from federal, state, and county agencies.

Recently, local residents noticed workers digging and drilling inside the Ballona Wetlands Ecological Reserve, just feet away from endangered Belding's Savannah sparrows.

SoCalGas claims to be abandoning these wells, but plans for this fake "restoration" project reveal that it is merely repositioning the gas wells right outside the ecological reserve to continue storing gas beneath the wetlands, in a process called "slant drilling."

The gas field will be the same size and equally dangerous to wild animals and the surrounding community. Continued gas operations at the wetlands counters new statewide orders to reduce climate impacts from fossil fuels.

The LA County Democratic Party has voted to stop injecting gas into the field below the Ballona Wetlands. Despite public opposition, SoCalGas received CalGEM permits to operate without a certified Environmental Impact Report or a full coastal development permit.

Please halt SoCalGas activity at Ballona Wetlands until adequate environmental review and permits are completed. Federal laws and the California Coastal Act must be followed. Tribal consultation is also required for this site.

Instead of bulldozing Ballona Wetlands, why not opt for Alternative 4 on the Environmental Impact Report, which is a more gentle approach that preserves the existing vibrant and diverse ecosystem?

Thank you for your consideration.

Sincerely,  
Mr Robert Norman  
13501 Windy Meadow Ln Silver Spring, MD 20906-6736 [rcnorman@gmx.com](mailto:rcnorman@gmx.com)

VIA EMAIL

December 18, 2020

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

Re: Agenda Item CD-0006-20 (NPS, Point Reyes GMPA); 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

I am a lifelong resident of the Bay Area. I have considered moving to a state with a lower tax base and lower property values and always decide to remain in the Bay Area because of its natural beauty, dedication to environmental conservation and emphasis on social justice and equity. The intent of the National Park Service goes against everything that defines California for me. The NPS intends to further destroy the native beauty of our home, they intend to increase environmental destruction and they intend to grant fifteen wealthy ranching leaseholders' access to property and wealth unavailable to the rest of the public.

I understand the California Coastal Commission can only address areas of conflict between the California Coastal Commission Act and the Coastal Consistency Determination provided to the Commission by the National Park Service. I submit the following to address obvious conflicts, and I ask you please consider additional factors identified below.

- 1) **California Coastal Commission Act, Article 2, Section 30210 — Development shall not interfere with the public's right of access to the sea where acquired through use or legislative authorization, including, but not limited to, the use of dry sand and rocky coastal beaches to the first line of terrestrial vegetation.** Coastal access is hindered by "no trespassing" signs, barbed wire fences, cattle manure, land so abused it is rutted with permanent trails devoid of plant life that make traversing it dangerous and ranchers and ranch hands insisting we are on their "land". On numerous occasions, I have been yelled at by rude ranch hands insisting I had no right to be on "their" property. When did we allow private ownership on this land? The public's tax dollars bought the land, our tax dollars pay the additional \$500,000 of costs necessary to maintain the land that exceed the lease payments received from the ranchers (mostly for fence repair to contain the ranchers' livestock, road repairs due to the ranchers' heavy transportation equipment destroying the roads and federal personnel protecting their interests). This is not "their" land, and they violate the CCCA by insisting otherwise and treating the land as if it was theirs.
- 2) **California Coastal Commission Act, Article 3, Section 30221 — Oceanfront land suitable for recreational use shall be protected for recreational use.** If you can traverse through the barriers installed to hamper access to the beaches, you will often find they are closed due to pollution caused by the ranching operations.

- 3) **California Coastal Commission Act, Article 4, Section 30230 — 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.** PRNS is included on a list of the ten most polluted coasts in our country. Threatened species, such as the snowy plover, are declining in numbers due to the impact of ranching. How is this even possible? I know how - ranching. But how is it possible we allow this to happen in California, in the Bay Area, in one of the most beautiful and ecologically diverse areas of the world? Knowing it is happening solely to benefit fifteen leaseholders and their sixty employees is disturbing, to say the least.
- 4) **California Coastal Commission Act, Article 5, Section 30240 — Environmentally sensitive habitat areas shall be protected against any significant disruption of habitat values, and only uses dependent on those resources shall be allowed within those areas. Development in areas adjacent to environmentally sensitive habitat areas and parks and recreation areas shall be sited and designed to prevent impacts which would significantly degrade those areas and shall be compatible with the continuance of those habitat and recreation areas. protections for environmentally sensitive habitat.** There is less than 2% of coastal prairie left in our state. Ranchers plant non-native species to feed their livestock. Cattle destroy native species by pulling vegetation at the roots. Our national parks are the most protected lands in our country. If we cannot restore nature in this environment, what hope do we have for the future of our planet, let alone our coasts?
- 5) **California Coastal Commission Act, Article 6, Section 30251 — The scenic and visual qualities of coastal areas shall be considered and protected as a resource of public importance.** Explaining to visitors why their view includes massive metal buildings with several inches of watery and smelly cattle manure surrounding them is never an easy conversation.

Social justice is an area of importance to Californians, and evidently not a concern for the current iteration of the National Park Service. The NPS's plan will decrease opportunity for urban children to recreate in our local national park. As if the opportunities for our youth are not hampered enough by Covid-19, school budget decreases and increased costs of living, the NPS intends to increase fencing, increase diversification of domestic animals, add row crops and recreational facilities available for those that can afford them. The entire plan is to develop the means for the ranchers, who operate in a dying industry, to continue to make a living off of our land. This is not equitable. The NPS should not be concerned with protecting and increasing the wealth of fifteen leaseholders over the public interest. The ranchers' parents, for those leaseholders that are offspring or previous landowners (many are not), sold their land over fifty years ago for the equivalent of \$350 million dollars. The adult ranchers of today were children at the time. They were raised as the offspring of the wealthy. Those parents wanting their children to continue ranching purchased property outside of PRNS, and their children still operate ranches outside of the park. There is not a single adult living and working in PRNS that should have any expectation that their livelihood and lifestyle takes precedence over the public's interest.

What is occurring at Point Reyes National Seashore is an environmental disaster, deliberately created to benefit the elite. It was hastily pushed through by the Trump administration and is presented to the CCC and the public without proper studies to determine the environmental impacts. The NPS's plans are dire for the future of the park, and our planet. They should not be accepted without further research and regulations requiring the ranchers not only improve their treatment of the land but also face significant consequences for the prior, current, and future damage of their for-profit operations cause.

Please slow this train wreck down. In response to an inquiry of the NPS asking why the priority is ranching rather than conservation, I have heard NPS employees Melanie Gunn and Dave Press state it was based on the decision of Ken Salazar, a prior Interior Secretary. Mr. Salazar is no longer in office, Congressman Jared Huffman failed in his attempt to legislate Mr. Salazar's gift to the ranchers (HR 6687) and we have a new Interior Secretary starting her position in one month. Additionally, with hindsight and based on current environmental studies placing the blame for climate change largely on animal agriculture, it is unreasonable to think we should further damage our planet in the most protected lands in our country because of an outdated "promise" made by a politician as they were attempting to save another part of PRNS destroyed by the same people who are operating cattle operations in the park.

Another excuse provided by the NPS for their promotion of ranching over the NPS's own mandate is "history" - "the history of ranching must continue in PRNS because the ranchers have been there for generations". If generational ownership is the priority, why are we not returning the land to the Miwok, who lived on this land for hundreds of years and prioritized caring for nature? If history is the priority, why are the ranchers not using historical methods? The ranchers are operating factory farms, concentrated animal feeding operations (defined as more than 800 dairy cows, which is the case on the McClure ranch), modern facilities capable of milking and raising far more cattle than they could 150 years ago using "historical" ranching methods. If the ranchers were using historical methods, they would not be able to manage the 5,600 cows living in PRNS, and their livestock would not be polluting our coast, destroying our land, and destroying native species at the current levels.

This is from an article reporting on the 2006 United Nations climate study:

Cattle-rearing generates more global warming greenhouse gases, as measured in CO2 equivalent, than transportation, and smarter production methods, including improved animal diets to reduce enteric fermentation and consequent methane emissions, are urgently needed, [according to](#) a new United Nations report released today.

"Livestock are one of the most significant contributors to today's most serious environmental problems," senior UN Food and Agriculture Organization ([FAO](#)) official Henning Steinfeld said. "Urgent action is required to remedy the situation."

Cattle-rearing is also a major source of land and water degradation, according to the FAO report, [Livestock's Long Shadow—Environmental Issues and Options](#), of which Mr. Steinfeld is the senior author.

"The environmental costs per unit of livestock production must be cut by one half, just to avoid the level of damage worsening beyond its present level," it warns.

When you know better, you do better. We need to decrease the damage caused by animal agriculture, not make special allowances for its continuance, particularly on federal land that benefits so few while harming so many.

The ranchers are staying on the land purely for economic gain. Their lease costs are 50% below the going market rate. They are not there because of a love or connection to the land. They do not protect the land. They are there for profit. They claim they will improve their practices; they will decrease the damage done to our creeks that flow into the ocean, they will develop the means to deal with the thousands of pounds of manure generated daily by their livestock, they will do better. But history provides 20/20 hindsight. The ranchers' practices over the last 50 years of their leases should form our decisions, not their empty promises. Please, slow this train wreck down. Request further studies before approving this plan. Allow our new Interior Secretary to have a say in what we are giving away for the next twenty years. Do not allow the NPS to give away our future.

Thank you,

Dawn Rogers



**From:** Bill Patterson <moi.bpat@gmail.com>

**Sent:** Friday, December 18, 2020 11:55 PM

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

**Subject:** Pt Reyes Cattle & Tule Elk

To To Whom it May Concern

Re: Pt. Reyes Coastal Elk Herd

My friends and I recently traveled to Pt. Reyes National Seashore to hike on the Tomales Point Trail and visit Pierce Point Ranch. I was shocked by the significant increase in cattle production operations. It struck me what a huge contrast Between the cattle and the outdoor beauty that we have been accustomed to for many decades. The beach access is so limited even though these are public lands. This is extremely unfair to the taxpayers who support the national park.

A friend of mine who has a BS degree in Water Management noted that the runoff of the cattle manure into the Estero is far more polluting than the oyster farm ever was. We have lost the oyster farm due to "environmental" concerns which I feel is hypocritical with the increasing pollution from the cattle farms. There is a growing movement to save the tule elk and push for a much better balanced use of land for the public and especially the elk herds. We literally observed a lone elk caught in a bare fenced soon-to-be cattle pen. It was awful to witness. The cattle production out-buildings block the views.

We come here to hike, view wildlife, especially the tule elk which are a rare sight for our children and friends who we make day trips with. We are joining with others to protest this blight of the park and the potential extinction of the tule elk.

Respectfully,  
Bill Patterson

Board Member, Fairfax Chamber of Commerce  
Small Business Owner  
38 year resident, Marin County

**From:** Loren Tamkin <lorent1122@gmail.com>

**Sent:** Friday, December 18, 2020 11:35 PM

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

**Subject:** Tule Elk

To whom it may concern, my name is Loren Tamkin. I've been a resident here in Marin County for my whole life. I spent plenty a day in my years growing up, heading out to the coast with my family and friends. Always loved the mystique of Point Reyes w its fog laden, wild native lands, hugging the coast. So rich and vibrant, all the varying wildlife and brush, and of course the majestic Elk. We couldn't wait to see if when we would cruise out there, we may catch the sight of a group of Elk lounging together;)

Upon going out we would not be so appreciative of having to go through the cattle lands to get out to where the Elk are. The cattle just seem like they don't belong there with all that native wildlife and the coast in a National treasure and Nature Preserve. The land where the cattle reside is totally decimated and polluted with cow poop/methane. You can see the big difference in the way the land looks, when driving through the cattle area, and then where the Elk live. Some days we would head to the beach and we would see signs that we couldn't go in the water because of the pollution. This has always been incredibly disturbing! It was noted that the cattle ranchers were paid quite a bit of money to leave in the 80s and why they still are there is a quandary to me. This is our local Monument. Where Native habitat can thrive and not be disturbed by factory farming, which is what it seems it has become, as of late. Seeing all the little white crates with the baby cows is rather horrifying! I am very UPSET that the park has not followed through with making these ranchers leave, as they were paid a hefty amount to do so. Please by all means leave the wildlife alone and let us enjoy one stretch of monumental land untouched by greed.

From the bottom of my heart I beg that the ranchers find another place besides our precious habitat here at our local and National treasure, Point Reyes National Seashore, Pride of The Bay Area!

Again, I beg of you, please make these ranchers leave and let's protect our almost extinct wild life and keep it intact and able thrive!! And for us to enjoy, visitors too! 🌿

Thank you so much for reading my comments today and considering my thoughts and feelings 🙏🌿🐮🌿

Sincerely, Loren Tamkin

Resident of Fairfax, Ca.

From: V <yummytummy8@gmail.com>

Sent: Friday, December 18, 2020 11:29 PM

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

Subject: Tule Elk

Hello Point Reyes Management team,

I am a long term, tax paying resident of Marin County.

It is very disturbing to know of the Tule Elk being contained & "managed" without reasonable access to water.

A natural part of an ecosystem has an important and natural place.

Please recognize that dairy farming is not a natural part of the ecosystem out at Point Reyes. I think it would more appropriate to terminate the dairy farming practices which causes run off into our habitat as well a host of other problems.

Humans only real predator is nature, as evidenced by the current pandemic. So, there is always a balance being sought and fundamentally we are the stewards of caring for the earth.

The purpose in me writing this letter, is really to speak up for the protection of the Tule Elk.

I implore you to reverse any decisions on expanding dairy farming on public land and to protect the Tule Elk in their natural habitat.

Sincerely,

Vincenza Costa

From: Scott Granado <scott.granado@yahoo.com>

Sent: Friday, December 18, 2020 11:25 PM

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

Subject: Point Reyes Management Plan

To Whom it May Concern,

My name is Scott Granado. I recently visited the Point Reyes Seashore & the experience was heartbreaking to see. The Tule Elk have been inhabiting the area for over 40 years. I saw many Dairy's in the area, taking more & more of the Elk's home. In fear for the Animals in the area, specifically the Elk, I urge for your consideration of my concerns to protect our National Seashore. The Lives of the Elk, & their home is far more important than the love of money & big business.  
Thank you for your time.

- Scott Granado

Sent from my iPhone

From: Carl Jensen <carljensen@sbcglobal.net>

Sent: Friday, December 18, 2020 10:52 PM

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

Subject: Pt Reyes Elk

The north coast is the natural habitat of the elk. Cattle are the intruders and polluters of the watershed.

Your job is to protect our coast and not the ranchers.

Do not cull (kill) the elk.

Sandra Jensen

Cotati, CA

**From:** Kaye Fleming <kayefdesign@gmail.com>

**Sent:** Friday, December 18, 2020 9:51 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:** Point Reyes Tule Elk

Dear Coastal Commissioners,

I am a resident of West Marin, the Point Reyes National Seashore is an integral part of my life. I have friends who are local farmers and I support their efforts to be leaders in sustainable farming.

However, the current plan to cull the native Tule Elk is not the best practice for managing these lands.

Point Reyes National Seashore was set aside as a refuge for indigenous plants and wildlife and their ability to flourish and grow should be upheld above all else. The Tule Elk deserve full access to all natural water sources, and provided water for survival during droughts.

Expanding cattle and introducing new farm species should not be allowed if it means the Tule Elk herds will be continually reduced from the gains they naturally make, coming back from near extinction, still a fraction of what they once were.

Sustainable agriculture supports local businesses and tourism, but with their effort to treat farm animals humanely, there should be the wisdom and innovative thinking to protect and coexist with the wild animals that were here long before we came.

As stewards of the National Park lands please go back to the drawing board and find a better solution for the Native Tule Elk.

Sincerely,

Kaye Fleming

Bolinas, California

**From:** Nadine May <nmaysf@gmail.com>  
**Sent:** Friday, December 18, 2020 9:19 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:** Comments re: Proposed NPS plan for Pt. Reyes

To the members of the California Coastal Commission:

As a native of the Bay Area, I am writing to express my absolute opposition to the NPS plan to prioritize, and even expand, private ranching over the restoration and public use of Point Reyes National Seashore, the West Coast's only National Seashore. The Coastal Commission must OPPOSE this plan. I oppose it 100%, and so do 91% of the members of the public who took the time to write public comments regarding this proposed plan.

The Coastal Management Act includes the following articles stipulating

- \* development shall not interfere with the public's right to access the sea and the coastal beaches.
- \* protection of the marine environment, including water quality issues and protections of the wetlands.
- \* protections for environmentally sensitive habitat.

The proposed NPS plan, which would include expanded areas for ranching and "culling" of the native Tule elk, flies in the face of those articles and those protections which were promised for the area.

Approval of this plan would be a slap in the face of democracy. The NPS permitted public comment regarding the question of whether ranching in the park would continue and expand. NPS received 7600 PUBLIC COMMENTS, and 91% of those comments OPPOSED the plan to continue (and expand) ranching at the seashore, and OPOSED killing native Tule elk to allow more room for the cattle.

It is well known that cattle are the seashore's TOP source of greenhouse gas emissions. The environmental impacts of ranching include:

- great harm to Native wildlife, including threatened and endangered species;
- terrible water pollution, including in the creeks and at the ocean because of cow manure; and
- overgrazing.

These results are the exact antithesis of the vision for establishing Point Reyes National Seashore, which was to preserve an area of undeveloped Coast so that all people in the area and outside the area might be able to enjoy the magnificence of nature in a national park only an hour from San Francisco. To sacrifice a national park to special interests is absolutely consistent with the TRUMP administration's horrendous policies to exploit public lands, despite overwhelming public opposition. Is this still a democracy? What does it say to the Coastal Commission and the National Park Service that 91% of the public who bothered to take the time to comment on this plan OPPOSED it? Again, is this a democracy?

I don't go to Point Reyes to see cattle. I go to see Tule elk and other native Wildlife that have inhabited the area for thousands of years, including seals and whales. I assume this is why just about EVERYBODY else travels to our magnificent Point Reyes, to hike the trails, to enjoy the incredible Vistas with native wildflowers and to appreciate the amazing nature that is all around us.

How on Earth can it be justified to kill half the population of the Native elk in order to allow more room for cattle and other farm animals...how can this possibly be justified? We are not in the 1700s and 1800s when European settlers took over native lands all the way to the Pacific Ocean, destroying Wildlife that thrived there, destroying the natural habitat and decimating the indigenous population who lived on this continent before settlers came from Europe, partially by killing almost all the animals that the indigenous people survived on. This is now! Would we do such things now? No! So what justification is there for doing the equivalent of what the settlers did: destroying the natural environment and almost eradicating many of the native species who lived here from the beginning.

This was not the goal of the National Park Service when it established Point Reyes and should not be the goal now!

If you want to talk about the economic impact of the plan, let us remember that ranching has given the county \$16 million in revenue. Tourism at Point Reyes, on the other hand, generates \$128 million for the county and attracts two and a half MILLION visitors annually. Will all those visitors still want to come to see cows and barnyard animals or will they come to see the Tule elk ---- and be angry and disappointed that the National Park Service has killed half the Tule elk herd????

We must, I repeat, MUST save the Tule elk, other native wildlife, the environment and vistas of Point Reyes and defend PUBLIC access to PUBLIC land! That is the will of the people. That is democracy.

I cannot say this strongly enough: I implore the Coastal Commission to refuse to approve the new National Park Service plan which would:

- \* open up Point Reyes to more cattle and farm animals;



- \* kill half the native Tule elk;
- \* negatively impact all the native wildlife and native species of this area; and
- \* continue to ruin the natural environment of Pt. Reyes.

Thank you for your consideration of my comments.

Sincerely,

Nadine May  
554 Sixth Ave. #302  
San Francisco CA 94118

**From:** Kimberly Welsch <kwelsch@welschmadison.com>

**Sent:** Friday, December 18, 2020 9:06 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@fws.gov

**Subject:** REDUCE FARMING AND CATTLE IN PRNS

Hello,

I have been a citizen of Marin for 25 years and was eager in the early 2000s to see a decrease in ranching as ranching leases were expiring. I was excited to see a restoration by the natural, regenerative plants and animals to the PRNS. With the Park Services and several congresspeople (Huffman and Feinstein) advocating for continued ranching there, I am appalled. This area will never regenerate while ranching is allowed. I don't care how long the ranchers have been there. 100 or 150 years is nothing compared to how long this land has been here and the Indigenous people have cared for it for millennia (unlike us settlers who have destroyed it with ranching). "Founding families" are not the ranchers, they are the Miwoks. Let's get that straight! Using the argument that these ranchers have been there for generations is a hollow argument. The Miwoks were there for much longer and know how to take care of the land MUCH better.

I want all ranching phased out of PRNS because...

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.

Kim Welsch

**From:** Anushka Drescher <adrescher@sbcglobal.net>

**Sent:** Friday, December 18, 2020 9:01 PM

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

**Cc:** craig\_kenkel@nps.gov; Carey Feierabend <carey\_feierabend@nps.gov>; Weber, John@Coastal <john.weber@coastal.ca.gov>

**Subject:** Point Reyes National Seashore unacceptable management plan

Dear Coastal Commission,

I trust that you are committed to your job to protect the natural resources of the California coast. It follows quite logically from this that you will have no problem rejecting the catastrophic management plan that the National Park Service has approved for Point Reyes National Seashore. Anyone who has any integrity can clearly see that that plan

(a) violates the original intent of the seashore, which, in its creation, included the payment of farmers to LEAVE the land, the money intended to help them move their farming operations elsewhere, so that the land occupied by their cattle would have a chance to recover and re-naturalize, and

(b) absurdly intends to continue a practice which, by the NPS's own Environmental Impact Report, is incredibly polluting and devastation to native flora and fauna ( which, it seems, ought to have priority over domesticated livestock in a NATIONAL PARK!).

I started visiting Point Reyes 30 years ago, but it was a while before I realized that there was an area comprising about 30% of Point Reyes that is incredibly UGLY and STINKS. The horrible smell from the cow manure (and the streams polluted by manure and urine) is something that really bothered me every time I drove by or visited the area where most of the ranches are located. Once, when I went to visit the elephant seal overlook, I noticed small streams of water flowing from the cattle "pastures" (no, they are not natural coastal prairie grasslands where the cows roam) tumbling down the cliffs, dirty and smelly.

I believe it is quite clear from many analyses that the waters flowing from the ranches are laden with bacteria from the cow manure and loaded with nutrients that represent a toxin to the coastal waters. This is simply unacceptable for the coastline of a National Park! As a person who has lived in California for 30 years and paid taxes, it is my right to insist that pollution from cattle be prohibited in an area where nature is supposed to be protected! On top of that, it is unacceptable that I have to be denied beach access

(by the park service) in the park on a regular basis because of possible exposure to unclean water that happens as a result of private industries (ranchers) in the park! What has the park service come to?! (Well, I suppose we all understand that our current national administration might have something to do with this. So we as Californians who value our state **MUST TAKE A STAND!** We can't let the national government get away with dumping shit on us! - pardon my language).

I'd love to hike along the entire coastline at Point Reyes, but I have less rights than private businesses and the cows there! My coastal access is being blocked by hundreds of miles of ugly and dangerous barbed wire, and herds of cattle. There is so little access to the beaches, even though this is public land. It's one thing to limit coastal access to protect the resource, I respect that. But it is not acceptable to limit my access in favor of much heavier animals that wander pretty much everywhere I cannot go, trample the ground, step and poop and urinate into the watershed. You would **NEVER** allow **PEOPLE** to do this - so how does it make sense to allow cattle!?

And this whole business about needing to protect "historic ranches" is ridiculous. First of all, there is already one preserved historic ranch at Point Reyes. We don't need more! That old ranch building and its interpretive panels tells us all we need to know, for those of us who might want to know about ranching. ( I personally see it as animal enslavement that is horribly cruel - just look at how nervous the cows are around humans when you go to the working ranches. I digress. But it **IS** also very disturbing to go to Point Reyes and see rows of plastic "dog houses", each with a little calf imprisoned inside of it. Is it not obvious that calves should be with their mothers? Is our California coast supposed to be a place where we have to witness baby animals "in jail"? If you have not seen this, I urge you to watch these two documentaries "The Shame of Point Reyes" or "The Betrayal of Point Reyes". They are free to watch on YouTube. These films also hi-light other disturbing facts about the ecosystem effects of ranching at Point Reyes) I any case, the ranches at Point Reyes that are operating are totally modern. They have heavy machinery polluting the air, and compacting the soil, as well as trucks destroying the roads as they bring extra fodder and carry away milk and animals bound for an unhappy end. If you have not seen the ugly scenes along the ranches, of cows near the feedlots walking in their own muck (it stinks terribly there), or standing on the parched, dusty bare earth during the summer, you must go and see it with your own eyes. This is not the kind of coast I am happy with, and it sure is not the kind of thing I would be proud to show my friends from overseas. We must do better

than this at Point Reyes! All of those ranches and their buildings and manure piles and feedlots and ugly fences block the vistas of the natural coast.

When I go to Point Reyes, I, like 90%+ of my fellow visitors do NOT COME TO SEE MORE COWS. I can see those all over California (there are millions of them!). Like most other people, 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. All this erosion and manure pollution is surely harming coastal marine life. This is not sustainable or furthering the mission of the Coastal Commission.

Since your decision-making should be guided by the Coastal Management Act, I repeat here several articles that are relevant to your decision 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, wetlands protections

Article 5 — protections for environmentally sensitive habitat

Article 6 — protection of coastal views

Thank you for considering my comments. I pray that you will take a firm stance AGAINST the National Park Service's plan and redirect this corrupted national authority back to the plan it SHOULD be adopting, which is "Alternative F", the plan that would finally implement the intent of the National Seashore to be a place free of commercial activity and 100% dedicated to nature, its protection and its enjoyment by visitors.

Thank you, and may your wisdom and conscience guide you in your decision!

Sincerely,

Anushka Drescher, PhD

1431 Ward Street,

Berkeley, CA 94702

(510) 684-8407

**From:** Tom Brown <katchat@sonic.net>  
**Sent:** Friday, December 18, 2020 8:40 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:** Tule Elk in the National Seashore

To the California Coastal Commission

### Our Mission

The National Park Service is dedicated to conserving unimpaired the natural and cultural resources and values of the National Park System for the enjoyment, education, and inspiration of this and future generations.

McClure Ranch is the only truly historic ranch in Point Reyes National Seashore worthy of consideration as a “cultural resource”. All other modern ranching should be phased out according to the original plans and intent when the ranches were purchased to establish the Park.

Tule Elk are endemic to California, and a unique symbol of wild lands the NPS is dedicated to protect. The ranches should be removed; the natural environment should be restored; and the Tule Elk should be allowed to roam free within in the Park.

Thank you for your consideration,

Tom and Kris Brown

Petaluma, CA

**From:** Margo Wagner <margowagnerca@gmail.com>

**Sent:** Friday, December 18, 2020 7:34 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:** Public Comments - Point Reyes Coastal Commission

Hi, my name is Margo Wagner, I was born and raised in the Bay Area and I am an avid backpacker, surfer and animal lover. I want to share my experience backpacking at Point Reyes National Seashore over the last 3 years and why it has become such a special place for my friends and I.

I love Point Reyes because I can be immersed in beautiful and wild nature. When I backpack with friends, our experience is enhanced by the native species we encounter. Last time, it was a nest of osprey. The trip before, it was being woken up by howling coyotes and seeing an elephant seal. And a few years ago, it was the calls of the free roaming tule elk as we were heading out.

The destruction of the landscape created by the ranching operation and the lack of biodiversity in that area is a stain on this landscape. I want to see fox, deer, tule elk as they exist in their natural coastal prairie habitat. Instead, I see confined animals, ugly structures, fences, and alot of dirt, mud and manure. The tule elk in this area are confined behind a fence and threatened to be culled in the proposed plan. I want to see free roaming tule elk as they are a native species.

The standard in the Coastal Management Acts Article 4 is about protection of the marine environment, including water quality issues and wetland protections. I want to enjoy splashing in the ocean without worrying about how manure pollution has affected the water quality after a heavy rain. I want to see whales and seals and other marine creatures and I am concerned the water quality will impact their health negatively or cause them (and me) to stay away. This is a National Park and protected coastline - the ocean should not be contaminated and unsafe here!

Please honor the standards set forth in the Coastal Act and protect the marine environment and endangered coastal prairie habitat.

Respectfully,

Margo Wagner

510-847-1183

**From:** Ruby Lee <ruby.art.film@gmail.com>

**Sent:** Friday, December 18, 2020 5:55 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:** Tule Elk

Please, I implore you desist from culling the majestic Point Reyes Tule Elk. Man has been messing with the Natural balance of life in the wild for far too long, including the extermination of natural wildlife predators, which is how this imbalance has come into being. It has to stop! We need to allow nature to renew itself. The National Park Service has a mandate to serve and protect the biodiversity of the land in both plants and animals. Please remember for what purpose you, as an institution, were created. It was not to appease the greed of industrial farming and ranching. It is to preserve our Natural world for generations to come.

Yours,  
Ruby Lee

Paintings and Poems

<https://www.skycloudmountain.com>



**From:** Latisha Lucero <Latisha.Lucero@LIVE.COM>

**Sent:** Friday, December 18, 2020 5:39 PM

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

**Subject:** Point Reyes Management Plan

To Whom it May Concern,

I'm writing this email regarding the proposed management plan by The NPS. As an avid lover of National Parks and public lands I'm saddened and disappointed to know that the private cattle ranchers interest are getting priority over the wellbeing of both the public lands and wildlife.

Allowing the cattle ranchers on private lands makes it harder for not only those animals who should thrive on the land but those visitors who wish to access the coast and all it has to offer. A couple months ago I made a visit to Point Reyes and it felt very strange and out of place to see the cattle on a National Seashore and the barren land around it. It was unwelcoming and really, it was an eyesore; it just wasn't right. The cattle have caused visible degradation of the land and its sad to see that the environment continues to deteriorate all for the sake of money. I urge you to consider the inconsistencies of having the cattle ranchers on the land against the purpose of the California Coastal Act. Please do what's right and most importantly what is best for the wildlife, the environment and the coastal prairie.

Thank you for your consideration.

Regards,

Latisha Lucero

**From:** Paula Shadid <pshad@comcast.net>

**Sent:** Friday, December 18, 2020 5:36 PM

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

**Subject:** Point Reyes management plans

To Coastal Commission,

I am writing regarding the management plan considerations for the Point Reyes National Seashore. It is time to make the park what it is meant to be – a natural park for the local wildlife and the public, consistent with being some of the most protected land on earth. The wildlife should be free roaming and safe. As of now, the Tule elk are restricted (fenced) and the public is restricted regarding access to the park and the coast. This is not consistent with Article 2.

It is time to stop ranching in Point Reyes. We, the public, have already paid for the land. Ranching has remained much too long, greatly contributing to the degradation of the environment through erosion, water contamination, unnatural views and promoting problems with non-native plant species.

The Tule elk are a keystone species and play a critical ecological role. They are native to California. If they can't be safe and free in their natural environment, where can they be? Please move ranching out of Point Reyes National Seashore. Please adopt Alternative F, the only plan that makes sense for a Point Reyes *National* Seashore - the environment and the people.

Thank you,

Paula Shadid

**From:** Cyprien Pearson-Du Toit <cyprienjane@gmail.com>

**Sent:** Friday, December 18, 2020 5:32 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:** Please tell NPS no more ranching

Dear California Coastal Commissioners,

**I would like to take a moment to submit my written comments asking you to please reject the National Parks Service's plan to extend ranching leases/expand ranching operations in Point Reyes National Seashore.**

Let me begin by saying that I was raised in Petaluma and have lived here since I was 5 years old. I am from the "dairy belt," as many call it -- the dairy and cattle ranching community that underpins so much of Sonoma County's Supervisorial District 2 -- and I have a deep respect for that agricultural legacy. These farming families have given so much to this region over the last many generations and, thus, I would never want to demonize them.

However, I am also an ardent public land lover. I spend each and every weekend either at Point Reyes National Seashore or another state, regional or national park in Northern California. I value public land and I believe in its continued openness and access to all residents. As an extension of that land, I value the native wildlife and flora that live upon it.

I am writing to you today to urge you to condemn the National Parks Service's plan to expand ranching in Point Reyes National Seashore. I ask this for several reasons:

1. **The ranchers were paid millions of dollars for their land.** They no longer own it and, thus, have no firm, legal right to it regardless of their history on it. They are allowed to remain because the National Parks Service (NPS) allows it. It is time that comes to an end.
2. **Large swaths of the public national seashore is inaccessible because the ranchers want to fence and pen in their cattle.** As such, the public cannot access what could otherwise be additional trails, beach access or open land.
3. **I have often heard about unsafe water in Point Reyes and closed beaches to protect the public, all because of run off from the ranching operations.** It is unimaginable that NPS allows this kind of pollution to happen repeatedly in a national park.
4. **It is my understanding that for the ranchers to extend their operations, NPS would have to cull Tule Elk.** Again, it is unimaginable that NPS would sink to the level of killing off native wildlife in order to make room for cows -- or, more specifically, to make room for for-profit private

industry. It makes me wonder if NPS is merely making this unconscionable decision because the ranchers' leases provide lucrative profits...

5. **Modern ranching practices are exceedingly hard on the ground with profit made a higher priority than rotational grazing and responsible herd size.** This is certainly the case in Point Reyes as so much of the farmland is barren dirt while just over the fence, in the areas open to the public, the flora is healthy and flourishing. I would hope that NPS would value healthy land over dry, barren, dead land in their parks.

Finally, I would like to address NPS' rationalization. As both the protector of environmentally and culturally important domestic land, NPS has said that the ranches in Point Reyes remain because they are historical. I would just like to say, as someone again who was raised among miles and miles of dairy and ranching operations just 30 minutes from Point Reyes National Seashore, this is not a good enough reason. In both Marin and Sonoma Counties, agriculture is given much priority. It is not an "endangered" industry. It is not as if the ranchers of Point Reyes would not have any other place to move their operations if NPS so ordained. The agricultural history of this region is very well represented and celebrated in many other locations in very close proximity to Point Reyes.

But our elk, they do not have other alternatives. They actually are endangered. They actually were brought back from the verge of extinction. They have been fenced into their preserve and denied the opportunity to search for water. In a national park, they deserve to roam free as wildlife should. And we, residents, recreators and nature enthusiasts, should be able to visit our public lands and enjoy them without having to dodge for-profit ranching operations or fear illness-causing pollution at the beaches.

Despite all of this, NPS wants more cows. Please tell them no. Please ask them to end ranching in the national seashore once and for all, and to restore this beautiful, special wild place to what the earth intended.

Kind regards,

Cyprien Pearson-Du Toit

Petaluma, CA 94952

(707) 835-7633

**From:** Laura Phillips <spikey@pixar.com>

**Sent:** Friday, December 18, 2020 4:33 PM

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

**Cc:** Weber, John@Coastal <john.weber@coastal.ca.gov>; Carey\_feierabend@nps.gov;

Craig\_Kenkel@nps.gov; Ryan\_olah@few.gov

**Subject:** Consistency Determination for the Point Reyes National Seashore GMPA and Environmental Impact Statement

December 17, 2020

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 California Coastal Commission Members,

My name is Laura Phillips and I am urging you to object to the National Park Service's (NPS) "Alternative Plan B" submittal, as it's plan to increase the size and scope of the existing ranches is inconsistent with the California Coastal Act with respect to Chapter 3 of the following articles:

Article2: 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 6: protection of coastal views

As a third generation Californian and a resident of Marin County, I am extremely proud of our extraordinary state. We are blessed with unparalleled beauty, and we have the only Coastal National Park on the west coast. I have hiked, kayaked, biked and even backpacked Point Reyes National Park for the past 40+ years. Any time that we have out of State visitors- from Pennsylvania, Florida, Colorado, Washington, and even Germany- we inevitably treat our guests to the extraordinary hike from Piece Point Ranch to Tomales Point, to soak in the breathtaking views, enjoy the extraordinary display of flowers, and marvel at our rare, native, and endangered Tule Elk.

Although I've been enjoying all that Point Reyes has to offer for over 40 years, I did not know until recently that the ugly, barren, dusty, moonscape terrain with 340 miles of fencing, unsightly metal buildings, piles of old tires, white plastic domes caging baby calves, cow manure, and barbed wire that I see while driving Pierce Point Road out to the Pierce Point Ranch trailhead is actually part of Point Reyes National Seashore. The ranches are completely inconsistent with the beautiful untouched landscape of Point Reyes National Seashore. The ranches are unwelcoming and an eyesore, with fencing blocking the public access to the beaches. The ranches destroy the natural beauty that would exist if ranchers had vacated the National Park once their leases expired, as was their original agreement. The NPS "Alternative Plan B" would expand the scope and scale of these ranches, increase the fecal pollution in the steams and coastal waters from cows and human septic tanks, add 59 more miles of unsightly and

unwelcoming fencing, and decrease the already limited public access to the beaches. The most egregious disgrace of the NPS "Alternative Plan B", however, is allowing the native, endangered Tule Elk to be "culled" as a management strategy, to keep the Tule Elk from interfering or competing with the grazing cows. This is unconscionable and immoral, especially for Point Reyes National Seashore, who's own Oct 17, 2019 Press Release states:

**"Point Reyes National Seashore was authorized in 1962 and established in 1972 to preserve and protect wilderness, natural ecosystems, and cultural resources along the diminishing undeveloped coastline of the United States. Located just an hour's drive from a densely populated metropolitan area, the Seashore is a sanctuary for countless plant and animal species and a haven for human inspiration, education, and recreation."**

"Alternative Plan B" is the antithesis of the NPS mission statement above. The ranches are clearly destroying the natural ecosystems, as demonstrated in detail in the countless thorough and scientific comment letters that you are receiving. Rather than protecting the wilderness and wildlife, the NPS "Alternative Plan B" intends to intentionally kill rare and endangered native Tule Elk. It is hardly a sanctuary for plant and animal species. I do not find the barren wasteland of dirt, dust, mud and flies that the ranches have created at all inspiring, and their 340 miles of fencing keeps the public from enjoying and accessing those lands and the beaches for recreation.

I have tremendous gratitude and reverence for the wisdom of Clem Miller, who wrote and introduced the bill for the establishment of Point Reyes National Seashore in 1962, to protect this amazing coastal wilderness to be enjoyed and cherished for generations well beyond ours.

You are the stewards of our spectacular California Coastline and coastal waters. The future of Point Reyes National Seashore is in your hands. If "Alternative Plan B" is implemented, the public will continue to be deprived of coastal access, deprived of unmarred coastal views, the coastal waters will continue to be polluted with e-coli, which will continue to close the beaches. Native wildlife and plants will continue to be destroyed and disappear. I am begging you to do the right thing, protect this precious and unique National Park, protect its native wildlife and plant life, protect the quiet and the breathtaking views and please protect the magnificent Tule Elk. These are all public treasures, for all to enjoy and appreciate for many more generations. Once it's gone, it's gone.

Thank you for your consideration,

Laura Phillips

Art Director and Green team member , Disney/Pixar Animation Studios

126 Suffield Ave

San Anselmo, CA 94960

(415) 497-8535

**What the public comes to Point Reyes National Seashore to see**



**What the public does NOT come to Point Reyes National Seashore to see**



Hello members of the CCC,

My first and only trip to Point Reyes National Shoreline was unexpectedly upsetting. I went with the intention of seeing wildlife, beaches, coastal prairies, and wild flora and instead we had to drive through farms and veal crates. If I had known, I never would have gone and this is why I haven't been back since. The farming in the national park is harming this coastal treasure. As someone who volunteers with an ocean conservation organization, I am incredibly concerned about what the decades of manure runoff is doing to the marine life and how it is degrading the quality of the shoreline. I also thought there would be beach access, these are public lands after all but so much is blocked off by farms who have overstayed their welcome. I cannot even begin to explain how infuriating the plight of the Tule elk is. The fact that NPS is turning their back on a native species in favor of livestock is appalling.

I really hope that the CCC can do something soon to restore these lands to the people instead of allowing NPS to prioritize ranching over nature.

Thank you for the opportunity to submit a comment,

Lisa Robles  
Oakland, CA



From: Chris Jones <cagjones@yahoo.com>

Sent: Friday, December 18, 2020 4:08 PM

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

Subject: Agenda Item CD-0006-20 Pt. Reyes wildlife vs cattle

Nobody goes to a National Park to view dairy operations.

Tule elk were abundant when Sir Francis Drake sailed into what is now Drake's Bay in 1579. By 1870 they had been hunted to the point of extinction throughout California. Thus their re-introduction in 1978, after 100 years of absence, continued their some 10,000-year history in the area.

After the Park was established in 1962 the public acquired the ranch lands. The owners were offered a lease for a specified term, so that they could continue their operations. It was not the original intent that these leases would continue for ever; had that been so, why was taxpayer money used to purchase the ranch buildings and land outright?

Now the National Park Service is about to sign off on a plan to offer 20-year leases, and to permit B & Bs, retail stores and additional livestock. With the accelerating public move away from dairy products, it is questionable whether dairy operations here will be viable in 20 years.

By a 90% margin, members of the public responded to a Park Service survey that they preferred the ranches to be phased out in 5 years.

Chris Jones

436 Trail Ridge Place  
Santa Rosa, CA 95409

707 938 2669

**From:** Jennifer Valentine <faboo1028@yahoo.com>

**Sent:** Friday, December 18, 2020 4:05 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:** please save our native elk in Point Reyes.

1. 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 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. 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:** Sharon Salisbury <sharonjanesalisbury@gmail.com>

**Sent:** Friday, December 18, 2020 3:47 PM

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

**Subject:** Tule Elk

I have been going to Pt. Reyes for 40 years to see the natural beauty...the wild flowers in the spring, the birds, the bobcats, coyotes, the elk(especially during rutting season), the seals, the whales and the hundreds of other spectacular and increasingly rare wild sights. When we have visitors, Pt. Reyes is always on the must-see list. What no one is interested in are cows, piles of stinking manure, modern dairy barns, no coastal access to beaches due to barbed wire fences and polluted water. Also, these farms were supposed to be phased out by 1987 but keep getting special allowances. Why?

I want to know how a national park, with rare and endangered species on it, allows this. I want to know what the National Parks mission is. Is it to provide and protect our remaining natural beauty and give humans a chance to escape the stress of this loud, exhausting world or is it to protect the rights of a few people to pollute and disturb the very things the National Parks are supposed to protect? And to achieve this end, the NP is actually going to go out and kill these magnificent animals??????? The NP killing the native animals, polluting the land and water, whilst protecting cows. I would like an explanation as to why this is even being considered.

Sharon Salisbury

**From:** hydro@hydroinsure.com <hydro@hydroinsure.com>  
**Sent:** Friday, December 18, 2020 3:47 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:** tule elk

Hello,

Please help & protect the endangered Tule Elk who have suffered abuse at Point Reyes.

Fencing them in without adequate water is very cruel in drought weather.

Letting the cattle ranches have access to what should be unspoiled park land is not good for the wildlife that people want to see & preserve at Point Reyes.

I don't want to see ranch cows on a visit, I want to see the native tule elk, the beautiful nature , & other wildlife. It is my understanding that most park visitors feel this way also.

I love cows but don't want them pushing out the native elk or using them as an excuse to cull elk or destroying native plants.

The ranchers need to provide for their cows in a humane way & if they don't have enough land, they should not have the cows or find somewhere that does not interfere with the park.

Just because some of the ranches are old or have had grazing privileges for years does not mean that they belong on the land. They used to dump toxic waste in the San Francisco Bay. That does not mean that it was a good idea. It spoiled a natural place.

These articles of the Coastal Management Act seem antithetical to ranching.

Article 2 development shall not interfere with the public's right to access the sea and coastal beaches

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

Article 5 protections for environmentally sensitive habitat

Article 6 protection of coastal views

Thank you for your consideration

**From:** dgberger22@mindspring.com <dgberger22@mindspring.com>  
**Sent:** Friday, December 18, 2020 3:23 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:** Tule Elk/Environment/NPS/Point Reyes National Seashore

Dear California Coastal Commission Members,

My understanding is that within the articles of the Coastal Management Act, the Commission should be protecting environmentally sensitive habitats, protecting water quality and wetlands, and should be protecting the public's right to coastal views and coastal access. As a Marin resident, I cannot understand why the National Park Service is allowing the cattle ranchers to expand commercial operation at the Point Reyes National Seashore at the expense of all other flora and fauna. It only takes a quick drive through this area to see the devastation the cattle ranching operations have perpetrated on this land. What was once a thriving eco-system of diversity is a vast dirt bowl with very little foliage in sight. Additionally, fencing now crisscrosses through the hills and valleys taking away public access and further restricting the Tule Elk in the area.

Please use your influence and the weight of the California Coastal Commission to oppose the National Park Service's (NPS) "Plan B" (shooting of the Tule Elk and expanding commercial cattle/dairy operations) of the Environmental Impact Statement for the Point Reyes National Seashore. Wildlife should not be shot in order to expand commercial enterprises on the "protected" National Park land. We need to act now to protect the wildlife out in Point Reyes, to protect sensitive habitats and wetlands, to protect water quality, view sheds and public access to the Point Reyes Seashore.

Real leadership is required now because it seems the NPS has forgotten their stated purpose and mission to protect and preserve. Why kill the Elk who don't negatively impact the land but enhance biodiversity? While 23 ranching families seem to have enormous influence, I know there are thousands of local Marin residents who are not in favor of killing the Tule elk, and are not in favor of expanding dairy/cattle ranching at the expense of destroying the land. Surveys have shown the public is in favor of the Tule Elk and keeping them

and their habitat in-tact. Why is an environmentally destructive, commercial operation allowed to continue, allowed to be expanded and prioritized over wildlife on public land? I am at a complete loss how this is happening when it flies directly in the face of all the impact studies and surveys that have been done on the issue.

For the record, I support farmers and ranchers and have a deep appreciation for what they do and the sacrifices they make to feed our community. There should be no problem allowing them to operate on private lands. The objection comes when they begin encroaching on sensitive habitats that are publicly-protected and when wanton destruction of wildlife becomes necessary to continue and expand their commercial operations. This is not ok!

I am imploring you to please step in and require alternative management strategies for the cattle/dairy ranching operations, for repair of the eco-system and management of the Tule Elk at the Point Reyes National Seashore. Shooting wild elk should not be an option. Thank you so much for your time and attention to this time-sensitive matter.

Very truly yours,

Deena Grady Berger, J.D.

Mill Valley

(415) 686-8778

**From:** Tony Sehgal <tcs1121@gmail.com>  
**Sent:** Friday, December 18, 2020 3:14 PM  
**To:** Coastal Point Reyes Management Plan <PointReyesManagementPlan@coastal.ca.gov>  
**Cc:** Weber, John@Coastal <john.weber@coastal.ca.gov>; Carey\_feierabend@nps.gov;  
Craig\_Kenkel@nps.gov  
**Subject:** Agenda Item CD-0006-20 (NPS, Point Reyes GMPA)

December 18, 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. Current land and habitat management of Point Reyes National Seashore runs counter to the mission of the Coastal Commission and is highly unsustainable.

Point Reyes National Seashore is no place for cattle ranches and dairy operations for a long list of reasons. These animal agriculture operations were paid for their land in 1962 and given 25 years to dismantle their business at Point Reyes and move elsewhere. For political reasons, that never happened.

It's now time to commit to the promise of restoring Point Reyes National Seashore to it's intended purpose and stop the environmental assault on the land, water, and native species that inhabit the Seashore.

I'm a wildlife filmmaker and have spent much time at Point Reyes National Seashore over the past year and have seen firsthand how devastating the ranches and dairy operations are on the land and their impact on native flora and fauna.

I see the ranchers and dairy operations as an atomic bomb that's gone off in slow motion. The damage is not evident to some, but on closer inspection by biologists and environmental experts, it's clear that the damage is significant and long-lasting. The land can and will heal if the ranch and dairy operations leave. This needs to happen as soon as possible.

Here are some specific impacts I want to point out that you must take into consideration:

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 come to Point Reyes 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. It's estimated that 10 million gallons of cow feces and urine are generated every year at Point Reyes.

5. The approximately 5,600 cows at Point Reyes contribute significantly to methane production, a potent greenhouse gas that is contributing significantly to the climate crisis.

I don't think the California Coastal Commission can legitimately support cattle ranching and dairy operations at Point Reyes National Seashore without undermining its mission and core objectives of ensuring that our natural resources are preserved for future generations.

Kind Regards,

Tony Sehgal

Bay Area Resident



**From:** Bernie Album <allbernie5@gmail.com>

**Sent:** Friday, December 18, 2020 3:03 PM

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

**Cc:** johnweber@coastal.ca.gov

**Subject:** Point Reyes Elk National Park

California Coastal Commissioners

I object to the US National Park Service plan to kill any of the Tule Elk herd in the Point Reyes Seashore National Park and the presence of any commercial operations such Cattle and dairy ranches.

These are my reasons:

1. My coastal access is being blocked by many miles of barbed-wire cattle fencing and herds of cattle. There is very little access to the beaches,even though this is public land.

2.The cattle and dairy cows are causing severe water soil pollution.When it gets into the creeks and runson to the beech then into the ocean the Park Service has to close the

the public park beaches because of manure pollution.

3.The designated historic ranches don't look historic with new looking industrial barns and other structures that look modern. Some of these modern structures block

vistas of the natural coast.

4.Like most all other visitors from around the world I come to see wildlife,native elk,elephant seals,salmon runs,and lush coastal prairies with wildflowers. What I see are

too many cattle,manure piles,some with old tires on top,ugly bars,bare ground, and erosion. All this manure pollution is likely harming or killing coastal marine life.

THIS IS NOT SUSTAINABLE OR FURTHERING THE MISSION OF THE COASTAL COMMISSION

SPECIFICALLY:

Article 2 - development shall not interfere with the public's right to access the sea and coastal beaches

Article 3 - RECREATION (not commercial operations) placing a priority on coastal dependence... recreation over development

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

Article 5 - protections for environmentally sensitive habitat

Article 6 - protection of coastal views

Thank you, in advance for doing your part to save our native elk in Point Reyes.

Bernie Album

Public Citizen community volunteer,secondary public school secondary teacher, retired

**From:** Bayani Inclano <binclano@pixar.com>

**Sent:** Friday, December 18, 2020 2:32 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:** Tule Elks

To those needing a reason to keep it green,

It has been brought to my attention that the beautiful land and coast of Point Reyes will be turned into a machine that will add even more harmful carbon dioxide and methane into our atmosphere. Not only will add to the rapid reality of global warming, but it will also prevent the necessary tools from doing their job. I am referring to its natural foliage that helps store the harmful carbon dioxides. The corporate farms will replace these native plants with heavy hooves, artificial grass, and manure, which I might add, that methane is 80 times worse than carbon dioxide when emitted.

The plans to eliminate the Tule Elks is genocide. It is out of touch. It is selfish. It is for profit. It is moving us in the wrong direction. Should we call these corporate cattle farmers Nazis? Yes, I do mean to be dramatic. How are we to improve our world with these actions? We know that what we are currently doing to our mother earth is not healthy. We know that it is destructive. We know that it increases global temperatures year by year. How is that we still seem to believe that destroying more of our earth will provide a better future? The planet earth has existed billions of years without interruption. Its fate has only changed because we have decided to play the role of an ignorant architect. We have built a home that will soon be more destructive and unpredictable.

According to the Global Climate Risk Index, more and more countries like the Philippines, Japan, and Germany, will take on the destructive nature of global warming. Our actions here have already affected people globally. People are dying and/or are without homes.

Saving the Tule Elks and preventing the corporations from moving in is the only choice. It is a move towards a more humane world. We want a place that chooses to be empathetic and intelligent. We are not doing this for us. These actions are for the earth and the home that it will provide for future generations.

Save the Elks to sustain a better future.

Bayani Inclano Jr.

From: Shoana van Wijngaarden <Shoana101@aol.com>

Sent: Friday, December 18, 2020 2:27 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: Urgent: Point Reyes / Tule Elk

Good afternoon,

I am writing to regarding the plan to kill the tule elk at Point Reyes National seashore. urge you to listen to public opinion regarding the future of Point Reyes National Seashore.

A National Park is no place for private business like the cattle and dairy ranches. I've never seen anything like it elsewhere. This animal agriculture is destroying the land, our environment, and the experience of visiting our only national seashore on the west coast. The fences prevent access to the beaches and many other areas that should be fully available to the public. They are also preventing the captive herd of Elk from seeking the water and forage they require to survive. This is unacceptable.

Additionally, the pollution at Point Reyes is among the worst in the world, as a direct result of the continued bovine ranching on these lands. The water is polluted and carries disease (ecoli for one), it is destroying the soil and ultimately contributing to the destruction of our world oceans. We want to see wildlife and nature, not cattle and manure. The smell is horrendous, the sight is disgusting, and the greed that fuels these ranches is absolutely abominable.

Even during the wildfires and dwindling natural water sources for the elk, the Cattle continue to drink water.

The Coastal Management Act (CMA) is clearly not being implemented effectively, and this needs to change immediately. Articles 2 thru 6 state that the land development is not to interfere with public access to the beaches and ocean. The land is supposed to be for recreation ONLY. The wildlife is supposed to be protected. The water quality and marine environment is supposed to be monitored and protected. The park service is doing almost nothing to adhere to and enforce the CMA. To top it all off, they are now planning to SHOOT protected and endangered Elk in the interests of the ranchers. This corruption will not go unnoticed.

Please reject the plan to kill the Elk, begin to phase out ranching completely at PRNS, and do the right thing by the public, and the wildlife.

Thank you,

Shoana van Wijngaarden

203-216-3300

**From:** Neal Fishman <[njfishman@gmail.com](mailto:njfishman@gmail.com)>

**Sent:** Friday, December 18, 2020 2:22 PM

**To:** Energy@Coastal <[EORFC@coastal.ca.gov](mailto:EORFC@coastal.ca.gov)>

**Subject:** Public Comment on January 2021 Agenda Item Thursday 6b - CD-0006-20 (National Park Service, Marin County)

December 18, 2020

Steve Padilla, Chair and Members

California Coastal Commission

455 Market Street, Suite 300

San Francisco, CA 94105

RE: Consistency Determination for Point Reyes National Seashore Management Plan

Dear Chairman and Members of the Commission:

We wish to comment on your upcoming federal consistency hearing on the Point Reyes National Seashore Management Plan. Our comments are limited to the issues surrounding agriculture at Point Reyes. We are opposed to the chosen alternative B because it allows significant cattle and dairy ranching to continue in the park in a manner that is clearly detrimental to other public values expressed in the Coastal Act.

Having worked collectively for over 50 years at the Coastal Conservancy and having worked with Coastal Commission staff over the years we understand that the Coastal Act expresses multiple values. The continuance of coastal agriculture is one of those, but so are public access, water quality, scenic protection, and ecosystem integrity.

If we were arguing for Plan B we would suggest that it is consistent with the Coastal Act because the plan includes agriculture among other uses in the parks 70,000 acres. Together these contemplated activities contained in the plan include many of the activities favored in the Coastal Act. After all, agriculture is only allowed on less than 25% of the land.

But as in CEQA, it is the environmental setting that often determines what is a significant impact and what isn't. This is a national park. While national parks sometimes do have agricultural operations or livestock this is not their purpose. People want and expect national parks to have environmental integrity within their boundaries. This principle should also attach to the Coastal Act. Yes, the Coastal Act does favor continued agriculture in the Coastal Zone. But this should not be contemplated in areas that are environmentally sensitive and at levels that do damage to other values, especially when those places are owned by the public.

Continued agriculture affects the accessibility of Point Reyes by fencing off thousands of acres. It destroys water quality by deposition of manure throughout the area. The cattle and dairy operations affect the scenic quality of the land with piles of manure, modern buildings in some areas, and fencing. The loss of the opportunity to reestablish the elk herd is curtailed as is the quality of the habitat for other species.

Marin County farmers and ranchers are Northern California royalty. They deserve this admiration. Many have been and are leading environmentalists. They formed the Marin Agricultural Land Trust that has been supported by environmentalists for years. Preservation of agriculture is important in the Coastal Zone. But this is Point Reyes, a national park. The vast majority of people who have responded to you are against continued agriculture. This public concern should raise the Commission's level of concern for the values that are being harmed.

Plan B may touch on more of the values contained in the Coastal Act than other options. But these values conflict at Point Reyes. The ranchers argue that they cannot reduce operations and stay in business. It would not be practicable. But if agriculture stays at current levels, it is not practicable, indeed, not even possible to fully protect other values of greater importance to the public. This is evidenced by the overwhelming sentiment by the public that agriculture should cease.

Damage done by agriculture reduces the overall conditions of the park for all of its national park purposes but also very glaringly its coastal values. If agriculture is continued it will continue to be impracticable to have clean water, unobstructed scenery, healthy habitat for multiple species, and the publics' ability to explore areas owned by them but which that have been closed to them for decades. This is public property. The ranchers were paid for their land decades ago. Their concerns need to be heard and they need to be treated with respect. But the National Park was not founded as an agricultural preserve. Its agricultural operators have no right to farm at Point Reyes, only a hope. The harm to other values is too great with Plan B. For this reason it is not consistent with the Coastal Act.

Sincerely,

Neal Fishman and Maxene Spellman

390 Monte Vista Lane

Petaluma, CA 94952

510-590-2925

707-790-3740

**From:** DCfromtheV <dclary86@gmail.com>

**Sent:** Friday, December 18, 2020 2:16 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 / Tule Elk

Hello, I am writing to urge you to listen to public opinion regarding the future of Point Reyes National Seashore. We want the ranchers and their cattle removed completely, along with ALL the fences. A National Park is no place for private business, it is destroying the land, our environment, and the experience of visiting our only national seashore on the west coast. The fences prevent access to the beaches and many other areas that should be fully available to the public. They are also preventing the captive herd of Elk from seeking the water and forage they require to survive. This is unacceptable.

There is nothing historic about a modern dairy or beef operation, in fact they represent a history that we, the people, wish to erase. Additionally, the pollution at Point Reyes is among the worst in the world, as a direct result of the continued bovine ranching on these lands. The water is polluted and carries disease (ecoli for one), it is destroying the soil and ultimately contributing to the destruction of our world oceans. We want to see wildlife and nature, not cattle and manure. The smell is horrendous, the sight is disgusting, and the greed that fuels these ranches is absolutely abominable.

The Coastal Management Act (CMA) is clearly not being implemented effectively, and this needs to change immediately. Articles 2 thru 6 state that the land development is not to interfere with public access to the beaches and ocean. The land is supposed to be for recreation ONLY. The wildlife is supposed to be protected. The water quality and marine environment is supposed to be monitored and protected. The park service is doing almost nothing to adhere to and enforce the CMA. To top it all off, they are now planning to SHOOT protected and endangered Elk in the interests of the ranchers. This corruption will not go unnoticed, and it will not be allowed to continue.

Please reject the plan to kill the Elk, begin to phase out ranching completely at PRNS, and do the right thing by the public. Please do your job, and do what is right. Thank you for your time.

Derek Clary

**From:** pr darrow <prdarrow@gmail.com>

**Sent:** Friday, December 18, 2020 2:14 PM

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

**Cc:** Weber, John@Coastal <john.weber@coastal.ca.gov>; Carey\_feierabend@nps.gov;

Craig\_Kenkel@nps.gov; Ryan\_olah@few.gov

**Subject:** The Future of Point Reyes National Park is in jeopardy

Hi All,

I am writing to express my serious dismay over the decisions being made regarding land management at Point Reyes National Park. I know most issues are not black and white, and that I am also not privy to the behind the scenes details and all of the complexities of the Point Reyes National Park land.

However, given the crises we have found ourselves in currently with the pandemic and even more important, climate change, it is time we start making decisions that are best for the planet, our environment and the survival of species including our own.

There are a number of prudent reasons why cattle ranchers should not be granted more rights than the rest of us, the native habitat and animal species:

- 1) Money has corrupted the amount of power and rights that companies get far beyond our individual rights.
- 2) My and everyone's 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.
- 3) 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.
- 4) 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.

And most importantly:

5) 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 do the right thing and vote for the preservation of Point Reyes National Park, our waters, the natural habitat and native species of plants and animals. Say no to corporate money, corruption, cattle and the destruction of our land for a small few. We shouldn't be eating so much dairy and cows anyways, for Pete's sake.

Thank you,

Pam

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

**Sent:** Friday, December 18, 2020 1:33 PM

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

**Cc:** Weber, John@Coastal <john.weber@coastal.ca.gov>; Carey\_feierabend@nps.gov;

Craig\_Kenkel@nps.gov

**Subject:** Point Reyes National Seashore

Dear Coastal Commission,

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

1. My coastal access is being blocked by hundreds of miles of cattle fencing, barbed-wire, and herds of cattle. There is 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.

The ways in which this violates the Coastal Act are numerous. 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:** [cmodances@everyactioncustom.com](mailto:cmodances@everyactioncustom.com) <[cmodances@everyactioncustom.com](mailto:cmodances@everyactioncustom.com)> on behalf of C Mo  
<[cmodances@everyactioncustom.com](mailto:cmodances@everyactioncustom.com)>

**Sent:** Friday, December 18, 2020 1:14 PM

**To:** Weber, John@Coastal <[john.weber@coastal.ca.gov](mailto:john.weber@coastal.ca.gov)>

**Subject:** NATIVE WILDLIFE OVER DOMESTICATED FEED ANIMALS ALWAYS!

Dear John Weber,

PLEASE don't allow feed animals to wipe out the endangered, iconic tule elk in order that human beings can eat dead flesh. There are PLENTY of options for beef cattle and other grazing animals all over the Bay Area, while the tule elk have very few left.

Isn't the mandate of the National Park Service to PRESERVE THE NATURAL ENVIRONMENT FOR THE PUBLIC GOOD?

We have seen (and smelled) what happens to grazing land given over to the raising of farmed animals and it isn't in any way a benefit to the public health. We can argue all day about whether or not eating meat is good for us but RAISING meat does nothing to enhance the beauty or diversity of a National Park - on the contrary, it wipes out not only the wild mammals there, it also reduces the habitat and population of beneficial insects and other wild creatures.

Alternative B elevates private profits and entitlements - something that is far removed from the actual job and purview of the National Park SERVICE.

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 park lands, allowing row crops and introducing sheep, goats, pigs and chickens, which will inevitably create more conflicts with other wildlife in the park, and lead to POLLUTION of the very lands the Park Service is sworn to protect.

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,

C Mo

Concord, CA 94518

[cmodances@hotmail.com](mailto:cmodances@hotmail.com)

**From:** Lauren Sandell <sandell.lauren@gmail.com>

**Sent:** Friday, December 18, 2020 12:38 PM

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

**Cc:** Ryan\_olah@few.gov; Craig\_Kenkel@nps.gov; Carey\_feierabend@nps.gov; Weber, John@Coastal <john.weber@coastal.ca.gov>

**Subject:** For Your Children, and theirs: The Time is Now to Protect Public Lands

Dear Point Reyes Management Team and NPS,

I grew up in Marin and enjoyed visiting Point Reyes as a child with my family. I still love to visit with my parents, and to this day, the highlight is seeing the Tule Elk as we walk and drive to the various locations throughout the park.

It is discouraging to know that our public land is being allocated to private cattle ranchers and impeding on the wildlife in this area. The time is now to protect the environment and the animals that reside there. As a young person, I am ashamed at how the generations before us have given in to industry and commercial demands and failed to protect the lands and animals we are supposed to steward.

What can now be seen at the beautiful seashore and park are too many cattle, piles of manure, dilapidated buildings, bare ground, and erosion, which are harmful to coastal marine life.

This is public land yet 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. Not only is the land being developed, it is also destroying the lives of the wildlife that reside in the area. The Tule Elk should not be fenced in and should never be kept from water sources to maintain their health and lives.

You should agree that wildlife is more important than dairy cattle. If you keep up this way of land management, your children and grandchildren will have nothing to wonder and gaze at while visiting this national land. Please protect the ecosystem that has been taken care of for eternity until humans took over for their own gain.

Thank you for your time, and please make the decision best for the habit.

Sincerely,

**Lauren Sandell**

**San Rafael, CA**

From: Warren Watkins <owlwo@sonic.net>  
Sent: Friday, December 18, 2020 12:23 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: Tule Elk at home in Pt. Reyes

Dear park managers,

We are native Californians. When we think of and visit Pt. Reyes, we focus on finding the iconic elk herd near Tomales Pt.

Our visit is diminished by the presence, smell, and pollution of range cattle. We know that the now industrial cattle and barns are embedded in our experience, but are distressed that they dominate the use of the coastal seashore there.

Articles 2, 3, and 5 of the Coastal Management Act are of particular concern. Please use your influence and protect our concerns at Pt. Reyes.

Warren and Janis Watkins  
Healdsburg, CA. 95448

From: Cornelia Durrant <cornelia.durrant@att.net>  
Sent: Friday, December 18, 2020 12:13 PM  
To: Coastal Point Reyes Management Plan <PointReyesManagementPlan@coastal.ca.gov>  
Cc: Weber, John@Coastal <john.weber@coastal.ca.gov>; CraigKenkel@nps.gov;  
Careyfeierbend@nps.gov  
Subject: Comments on Point Reyes Management Plan

Dear Commissioners

I am a long term, full time resident of Point Reyes Station and I visit the Point Reyes National Seashore 3 or 4 times a week. I am writing to urge you to oppose the management plan for the National Seashore submitted by the NPS and currently under your review.

The commercial interests of the ranchers within the National Seashore should not be given precedence over the health of the diverse ecosystems within the park or the millions of people who visit the park every year. Far from allowing the ranchers to expand their commercial interests into other areas of farming for the next 20 years they should be phased out and the farmed areas restored. This is not a management plan. It is simply a way of kicking a difficult, necessary and long overdue decision to end ranching within the National Seashore down the road for someone else to deal with in the future. I urge the Commission not to do the same.

The Park's own EIS shows how detrimental the ranching is to the ecosystem that they are charged to protect and anyone visit the Park can see the evidence with their own eyes. Polluted streams, huge commercial barns, cruel calf pens, fences blocking off access to public lands and thousands of acres of overgrazed land with scarcely a bird, wild animal or wild flower to be seen. The ranchers do not care for this land, they use it. There is a profound difference.

It is inconceivable to me that rare, magnificent and indigenous Tule Elk within the park will be shot to protect the commercial interests of a few ranchers. Once the shooting begins you can be assured it will be become a scandal which extends well beyond this area and a disgrace to the National Park system.

The NPS's record of caring for the Tule elk is appalling. The Tomales Point herd is kept behind an 8ft fence and even during the droughts of recent years given no feed or water. The suffering of these creatures during the drought years is terrible. There is no justification for the Park's policy of not supporting them. If they are wild and must fend for themselves then take down the fence and let them roam. If they are fenced in, and therefore only semi-wild, they should be cared for.

The Coastal Commission is the last, best hope for the health and beauty of our National Seashore and I urge you to reject the management plan before you. What is being proposed is in clear violation of Articles 2,3,4,5 and 6 of the Coastal Management Act. The fire this summer has taken so much. Please do your utmost for the rest.

Thank you for giving me the opportunity to comment.

Sincerely,  
Cornelia Durrant  
9 Los Reyes Drive  
Point Reyes Station

**From:** Suzanne G <ionart@hotmail.com>

**Sent:** Friday, December 18, 2020 11:50 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:** Re: Coastal Consistency Determination for the PRNS and North District GGNRA General Management Plan Amendment and EIS

Dear Coastal Commission Members,

I'm writing to share my concerns about the management of the Point Reyes National Seashore (PRNS). When I visit this beautiful park, I'm deeply disturbed that my coastal access is being blocked by hundreds of miles of barbed wire cattle fencing with little access to beaches on my public land – our public land. In Article 2 of the Coastal Management Act's (CMA) articles it states that: development shall not interfere with the public's right to access the sea and coastal beaches and Article 6 emphasizes: protection of coastal views.

The water pollution is appalling! The cow manure stinks and to see it flowing into the creeks is something that should not be happening on a national seashore that is supposed to be protected from this kind of degradation. CMA's Article 4 professes: protection of the marine environment, including water quality issues, wetlands protections. And Article 5 – protections for environmentally sensitive habitat. I've learned that the National Park Service (NPS) sometimes closes the beaches because of the fecal coliform manure pollution. Isn't it the NPS's mission to protect wilderness and wildlife? Why isn't this happening when the rancher's leases were bought out many years ago? Why are the ranchers still there? This is a travesty that should end NOW and OUR park should be restored to its natural state, free from ranching of any kind. We should have a protected, wild seashore that we can be proud of sharing with all visitors.

Furthermore, the historic character of farming at the PRNS is spoiled by new industrial dairy barns which are modern – not historic – with plastic calf hutches. These structures mar and block the views of the natural coast and the ground is denuded of vegetation which you can see in the attached photo that shows the difference between cow destruction as compared with the vegetation on the fenced Tule elk preserve. Another question – why are these indigenous wild animals being fenced in in a national park?! This is a real head scratcher!

When I go to a national park it's because I want to see wildlife, Tule elk, elephant seals, whales, salmon runs and lush coastal prairies with native grasses and wildflowers. What I see instead are an abundance of cows, manure piles covered with tarps and tires, ugly barns, barren ground and erosion. I would imagine that there are studies that attest to the poor quality of the water and that this might be harmful to marine life. Otherwise, why would the NPS close the beaches? Is this to protect humans? If so, then surely this isn't good for other life forms.

I hope the agencies that are supposed to be protecting our once pristine and beautiful PRNS will get back to the very important business of doing what they are supposed to be doing for the good of all.

Sincerely,

Suzanne Gooch

Sausalito



**From:** Ellen McCann <EllenM@rgrdlaw.com>  
**Sent:** Friday, December 18, 2020 11:32 AM  
**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>; 'Craig\_Kenkel@nps.gov' <Craig\_Kenkel@nps.gov>  
**Subject:** Point Reyes National Park

It is unfortunate that you fail to acknowle the voice of the people calling for wildlife, tule elk, elephant seals, whales, salmon runs and lush coastal prairies with wildflowers at Point Reyes, not cattle, manure piles, ugly barns, bare desiccated ground and erosion. All the erosion and manure pollution is harming the coastal marine life and goes against the mission of the Coastal Commission.

Please listen to the voice calling for environmental justice for the people that use the park and for the wildlife that lives there.

In kindness,

Ellen McCann

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**From:** kristin womack <kristinwomack@yahoo.com>

**Sent:** Friday, December 18, 2020 11:24 AM

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

**Subject:** Please help defend and restore Point Reyes National Seashore!

To Whom It May Concern:

I am writing to you out of deep concern for the future and well-being of Point Reyes National Seashore. I have lived in Marin County for nearly 65 years and have enjoyed the beauty and uniqueness of Point Reyes National Seashore for most of my life. When I learned that the National Park Service was considering a plan to shoot a number of Tule elk each year in order to benefit local cattle ranchers I had never realized that there was commercial dairy and beef ranching within 30% of the park! I have now discovered a great deal more about the history of the formation of the park and am shocked and horrified to learn about the destruction of native coastal prairie habitat, the loss of native plant and animal species, the extreme pollution of local streams and beaches caused by runoff from manure and now the possible culling of reintroduced Tule elk. The original ranchers were well compensated for their properties in the early 60's and given 25 years to end their ranching activities. Then in the 70's they convinced the Senate to amend the original agreement to include recurring short-term leases and this arrangement has continued now for nearly 50 years! I do not take lightly the elimination of ranchers' livelihoods but apparently their profit margins are razor-thin and the NPS is considering allowing them to now raise chickens and pigs and other livestock to make their operations more successful financially. Some of the ranchers own additional property elsewhere. 10 Tule Elk were introduced to Pt. Reyes in 1978 and the state's population of Tule elk is now at something over 5,700, down from a historic population of possibly 500,000. There are nearly as many cows now in Point Reyes as elk! There have been times when beaches and streams within the park have been closed to swimming due to fecal coliform bacteria water pollution from manure, and some beaches are inaccessible because of barbed wire fencing. The NPS apparently has little money for water quality tests but the rangers have time to repair fencing! There have been no water quality tests performed in the last 7 years but historically the level of pollution has been extremely high. I do not believe this is consistent with the California Coastal Act and California Coastal Zone requirements. Please do all you can to ensure that Point Reyes National Seashore is protected and restored!

Sincerely,

Kristin Womack

396 San Francisco Boulevard

San Anselmo, CA 94960

This dramatic photo, taken in Point Reyes National Seashore, shows land affected by cattle on the left side of the



fence and  
pristine  
land on  
the right.



**From:** Emese Wood <emesew@gmail.com>

**Sent:** Friday, December 18, 2020 11:06 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:** Tule Elk at Point Reyes

Dear Mr. Weber,

I am very concerned about the status of the Tule elk at Point Reyes. These magnificent animals have brought a sense of awe and pleasure to so many park visitors, including my own children and four granddaughters. I was horrified when a few years ago the Park Service did nothing to help the elk during the drought and a huge number of them perished. I understand that now there are even proposals to allow the farmers to shoot the elk. I think that it is atrocious to allow this type of slaughter in a National Park which should be for the benefit of all visitors and wildlife. The farms in the Point Reyes national seashore are not practicing sustainable farming. In fact, dairy farming is considered a major source of greenhouse gasses and global warming. The farms are an eyesore that diminishes visitors' access to the beaches and recreational facilities. They are a source of pollution that is draining into the ocean and is probably affecting marine life as well. I urge the Coastal Commission to take a hard look at the purpose of the National Seashore and the needs of visitors and taxpayers, and work to eliminate farms that should have been phased out years ago. We need to work to upgrade this unique natural landscape-- visitors and wildlife should have priority over commercial enterprises. At the very least the farms should be fewer in number and upgraded to be the highest models of sustainability. Shooting of elk should not be allowed and the fence at Pierce Point should be removed. The elk should also be supplied with water in times of drought if that is necessary (BEFORE they start dying.)

I would very much appreciate your attention to this matter.

Sincerely,

Emese Wood

San Rafael

**From:** James Hines <[jhcasitas@gmail.com](mailto:jhcasitas@gmail.com)>  
**Sent:** Friday, December 18, 2020 10:42 AM  
**To:** Huckelbridge, Kate@Coastal <[Kate.Huckelbridge@coastal.ca.gov](mailto:Kate.Huckelbridge@coastal.ca.gov)>  
**Subject:** Pt Reyes General Management Plan

Hello Ms Huckelbridge:

I am interested in the upcoming CCC hearing on the National Park Service General Management Plan for Pt Reyes National Seashore.

Will Tule Elk be hunted?

How does one comment to the commission about the plan?

Thank you,

Jim Hines

Ventura, CA

**From:** jack kenney <[kenneyj88@yahoo.com](mailto:kenneyj88@yahoo.com)>

**Date:** Friday, December 18, 2020 at 8:49 AM

**To:** Carl, Dan@Coastal <[Dan.Carl@coastal.ca.gov](mailto:Dan.Carl@coastal.ca.gov)>

**Subject:** point reyes

Hi Dan carl, i as a marin county resident am bothered by the cows being in point reyes. they make it look ugly due to the barron dirt and sludge piles, they remove the natural beauty of the park and cause beaches to be full of fecal coliform, please do not approve of alternative b that the park is proposing and go with alternative F and do not renew the leases.

December 18, 2020

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

Re: Agenda Item CD-0006-20 Pt. Reyes - Wildlife vs. Cattle

Dear Commissioners

As a Commissioner on the Sonoma County Fish and Wildlife Commission and a longtime wildlife rehabilitator (now retired), affiliated with Sonoma County Wildlife Rescue, it is my opinion that the National Park Service is moving in the wrong direction by choosing Alt. B as the way to go forward. There are so many reasons why this is a bad choice.

If for no other reason, this is a moral issue. These ranchers were paid well for their ranches and given very long leases to come up with a Plan B. It was never the intent for them to stay on. How many people get paid for their land, and get to keep it and stay on and on, and on? These ranchers have way outstayed their welcome and it is time for them to move on. It is our park, not theirs.

People do not go to National Parks to see cattle. They go for the natural beauty, the wildlife, and to commune with nature. There is no way that cattle fit into this picture, they denude the land, pollute the water, and their manure smells terrible. Animal agriculture is one of the major contributors to global warming. There is policy and law not to have ranches in national parks. These ranches must be phased out - that is the law. The maximum protection of the environment cannot be achieved with ranches on the land.

The dairy industry is on its knees. These ranchers are well aware of that. A week doesn't go by when we see more dairies are folding. This is why these ranchers want to diversify, which is terrible for the park. The last thing we need is sheep and goats, farm stays, and a slaughter house in a national park. As one who has spent a lot of time advocating for wildlife, co-existence, and trying to educate the public about their value, I know from experience that sheep, goats and chickens will attract more predators to these ranches - mountain lions, coyotes, raccoons, bobcats, etc. And what will these ranchers do if they have problems with these predators - they will call Wildlife Services, or trappers to come in and kill the offending wildlife. Is this what we want at Pt. Reyes? Our beautiful and diverse native wildlife killed so that goats, sheep, chickens and cows can be there. I don't think so.

There was a public comment period, and over 90% of the people who responded opted for Alternative F, the phasing out of these ranches. It is our park, but the NPS seems to not pay much attention to public comment, and have all kinds of ways of viewing the results and ignoring them. Does anybody honestly think that at one of the most beautiful parks in the world, it is appropriate to have dairy cows and beef cows? Goats, sheep, chickens and farm stays??

Perhaps the most disturbing thing to me personally is how the NPS's proposed decision will affect the Tule Elk. I imagine many of you have had the opportunity to see the Tule Elk, a native species, and the only elk that reside in a national park. They are magnificent, and if you haven't seen them, I encourage you to do so. Alt. B, would allow the shooting of Tule Elk to benefit the cattle. Does this make any sense in a national park? We kill native wildlife so cattle can graze? Every single one of those cows is destined to be killed anyway when they are no longer useful or, in the case of beef cattle, when it's their time to become hamburgers - that is the story of the dairy and beef industry.

At present, the Tule Elk are restrained by fencing. This also makes no sense in a national park. A few years ago, during the drought, about half of this herd died because they had no water. There was a huge public outcry. It was the responsibility of the park employees to look after these elk, but apparently they weren't interested in them. A similar situation developed this fall when concerned citizens discovered dead elk and most of their water sources dried up. There was also a bad fire at Pt. Reyes. One group even tried to get water into the elk, only to be discouraged by park employees, who should have been doing it themselves. The park employees went out of their way not to help the elk. It seems the NPS employees are more interested in the cattle. This is not right.

It is my understanding that many of the park employees grew up in the Pt. Reyes area, as did the ranchers and their families. There are lifelong friendships there, but that is no reason to keep such a large area of Pt. Reyes National Seashore off limits to the public so that these ranches can continue. Dairy farming and national parks have different priorities. I don't want my tax money spent on NPS employees working on cattle ranches, repairing fences, etc.

If the NPS goes through with their plan, I believe it will go against several articles of the Coastal Management Act, i.e., Article 2, Article 3, Article 4, Article 5, and Article 6.

There are many letters you have received on this issue that are so much more comprehensive than mine, many written by experts in their various fields. I would especially refer you to Laura Cunningham's excellent letter, which I have added my signature to. Laura Cunningham is the California Director of the Western Watersheds Project and she is so very knowledgeable on this topic.

In the end, I very much hope you will not go along with the National Park Service's intent on this issue. Nothing about it is ok, and it is very disappointing that they would take the side of ranching over nature.

Thanks for all you do to keep the California Coast not only a national treasure, but a worldwide destination.

Sincerely yours,

Sharon Ponsford

**From:** Michael Rupena <[mrupy69@yahoo.com](mailto:mrupy69@yahoo.com)>

**Date:** December 18, 2020 at 8:09:47 AM PST

**To:** [PointReyesManagePlan@coastal.ca.gov](mailto:PointReyesManagePlan@coastal.ca.gov)

**Subject:** Point Reyes Management Plan B

Dear commission members,

I am writing you this letter with great concern for our national seashore. I am going to go through a series of points of concern. From the beginning when I drive into Point Reyes national seashore I would expect to see beautiful coastal prairie and wilderness in it's natural state along with an abundance of thriving native plants tule elk, coyotes, bobcats, foxes and other wildlife that thrives in a coastal prairie in it's natural state. Instead I say gray dirt covered in cow poop and it smells bad too. Sometimes you even get to see the cow pooping. Other times we get to see folks in tanker trucks spraying the manure. This is very sad and not what I or other folks in my opinion come out to Point Reyes to see. This would relate to Article 6 of the Coastal Zone Management Act.

2-The access to the beaches along the coastline is completely blocked with miles of barbed wire fences. Why on public land, our national seashore is our access so limited to the actual beach. I have to drive far out to the few limited spots we do have access to. This relates to article 2.

3- The waterways and streams in Point Reyes national seashore are some of the most polluted in the United States. Why are they so polluted we all know cow manure. So when I go to the beach and it is closed do to health hazards (pollution) it is incredibly frustrating to know I can not access our public beach because of someone running a private for profit business is polluting the water. This relates to article 2 and article 4.

4- Tying into this same point the coho salmon, steelhead trout and red legged frogs are being threatened (poisoned by these contaminated waterways) so now we're talking about wildlife species that are being killed in an unnatural habitat. This is not my vision of a National seashore. There are nesting birds killed in the silage mows as well as fawns. Snowy plovers are being threatened and to kill tule elk?

When I go to the Point Reyes national seashore it is to see the pristine coastal prairie, it's wilderness and wildlife not COWS.

I want to thank each and every one of you for listening to and considering my concerns on this situation. You have done such a great job and I hope you will stand up for the environment in this difficult situation. We need your help.

Thank you,  
Mike Rupena

Sent from my iPhone

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

RE: CD-0006-20 (National Park Service, Marin County)

Dear Coastal Commissioners;

We are constituent watershed experts concerned about the environmental damage caused by overgrazing, riparian vegetation removal, erosion, and pollution from many ranch practices today at the Point Reyes National Seashore. We are very familiar with the status of the Tule elk in Point Reyes National Seashore (PRNS) having studied them extensively, served as NPS Docents for 3 years and in the last several years and spent many days observing them and the ranches. We have also been focused on water quality issues and fisheries, and are also aware of the extirpation of salmonids throughout the seashore because of destructive grazing and ranch practices.

**There are around 6000 Tule elk in existence in California and in the world. That is how many cattle there are in the Point Reyes National Seashore.**

**We implore you to do the right thing and restore the polluted water and damaged landscapes at the Point Reyes National Seashore for future generations. Future generations deserve to know the beauty and wildlife that was once there and that visionary leaders put forth when they brought the Tule Elk back to their native range with the expectation that once the ranchers were paid, they would eventually leave those operations.**

Even though required in their leases, ranchers have not employed best management practices recommended under the Resource Conservation District ranching protocols to restore their stream zones, fence out livestock from riparian areas, prevent excrement from winding up in streams, and retain top soil by restoring their lands. Those opportunities have been routinely suggested to them with little to no avail.

The ranches are known to be polluting the ocean, the lagoons and the creeks. Therefore, they are in violation of the Federal Clean Water Act. Further, the practice of silage mowing during the bird nesting season that grinds up fawns and birds is both animal cruelty and a violation of the Federal Migratory Bird Act. A grazing waiver also violates the ranches own lease agreements to employ best management practices.

As past Tule Elk docents, we are devastated at the prospect of culling this genetically vulnerable species and thereby endangering an already endangered species. At least, consider the BLM's relocation of Roosevelt Elk several decades ago (1970's) into Oregon and would recommend that these important keystone species be considered for their importance in a healthy ecosystem.



**From:** Susan Fischer <sue\_rd\_badger@yahoo.com>

**Sent:** Friday, December 18, 2020 3:15 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:** The Consistency Determination for the National Park Service Point Reyes National Seashore 2020 General Management Plan Amendments

Dear Mr. Weber,

Below are our comments concerning the Consistency Determination for the National Park Service Point Reyes National Seashore 2020 GMPA. We have also provided these comments to the California Coastal Commission Team that will be reviewing this issue.

Thank you for your consideration of our comments and for your service to the state of California.

Sincerely,

Susan and Dennis Fischer  
Walnut Creek, CA

December 7, 2020

To: California Coastal Commission

RE: The Consistency Determination for the National Park Service Point Reyes National Seashore 2020 General Management Plan Amendments

The National Park Service (NPS) at the Pt. Reyes National Seashore (PRNS) has submitted for your review a Federal Consistency Determination for the adoption of amendments to the Seashore's General Management Plan (GMP) and the accompanying Final EIS, which will be discussed during your meetings in January.

We strongly urge the Commissioners to reject the NPS submittal because it misrepresents consistency of the GMP with the California Coastal Act with respect to Section 30251 Scenic and visual qualities:

*The scenic and visual qualities of coastal areas shall be considered and protected as a resource of public importance. Permitted development shall be sited and designed to protect views to and along the ocean and scenic coastal areas, to minimize the alteration of natural land forms, to be visually compatible with the character of surrounding areas, and, where feasible, to restore and enhance visual quality in visually degraded areas. New development in highly scenic areas such as those designated in the California Coastline Preservation and Recreation Plan prepared by the Department of Parks and Recreation and by local government shall be subordinate to the character of its setting.*

After living abroad for 15 years, we were excited to return to the Bay area and all that it has to offer. One of our favorite activities is to spend a day at Point Reyes National Seashore to enjoy the beautiful natural habitat and wildlife. We have made numerous visits to the park over the past two years, and find portions of the visit to be disappointing and disturbing. We visit a national park to be immersed in nature, but often find ourselves driving through what appears to be a barren wasteland. This is the case for most of the drive along Pierce Point Road on the way to the Tomales Point Elk Reserve. The view consists of Confined Animal Feeding Operations, trodden and barren dirt and/or weeds, areas filled with manure, miles of barbed wire fencing, and farm related buildings in various states of repair. This is not the view we expect to see in a National Park. In fact, we find the experience to be depressing and an example of extremely poor stewardship of the land. Although we haven't visited the entire park, we wonder if it is even possible to enjoy any of the coastal areas without being confronted with the stark views caused by the dairy and beef operations located within the park.

By law, the NPS is mandated to manage all national parks in a manner which provides maximum protection, restoration and preservation of the natural environment for generations to come. This is certainly not taking place on the land that one must view on the drive to Tomales Bay. Please see photos below:



Stark Views Along Pierce Point Road - Sep, 2020



Stark Views Along Pierce Point Road - And Strong Manure  
Odor - Sep, 2020



Stark Views Along Pierce Point Road - Sep, 2020



Stark Views Along Pierce Point Road - Sep, 2020



Stark Views Along Pierce Point Road - Nov, 2020

In January of this year, we had the good fortune to attend a PRNS field trip led by Laura Cunningham, California Director of Western Watersheds Project. We learned that the barren and degraded landscapes that we view within PRNS are due to the grazing of cows. The barren and/or weed covered land that we view within the park should be covered in native coastal prairie, valley grassland, and coastal scrub. Ms. Cunningham also discussed the rare and biodiverse coastal prairie ecosystem. This native habitat contributes to the wellbeing of native animals and protects the soil from erosion. We also learned that the cattle areas are not only absent of native grasses, but the vast amounts of manure produced by the cows pollutes the streams, beaches and ocean. We should be protecting natural habitat within a National Park for the enjoyment of visitors and also preserve the natural environment. Below are photos taken during the field trip:





Non-Native Weeds In The Areas Containing Cows



An Unsightly Confined Animal Feeding Area



View Across to Large Cattle Operation Showing Non-Native Plants



A Small Area Of Undisturbed Native Plants





Native Grasses and Shrubs

Point Reyes National Seashore is the only national Seashore on the West Coast of the United States. It is a natural treasure that should be maintained as a haven for wildlife and wild habitat. The public should be able to visit this National Park to be immersed in nature without having to be confronted by scenes of destruction caused by agricultural operations.



What We Expect To See in PRNS



What We Expect To See in PRNS

We strongly urge the Commissioners to reject the NPS submittal because it misrepresents consistency of the GMP with the California Coastal Act with respect to Section 30251 Scenic and visual qualities.

Thank you for your consideration.

Susan & Dennis Fischer  
2735 Cherry Lane  
Walnut Creek, CA 94597

Where there were estimates pre-Gold Rush in California, their native range, of over 500,000. they were reduced to less than 20 in 1875. Now, to go from 20 to 6000 in 140 years is hardly a "success" story throughout their historic range and now are found only on 21 private and public preserves and where some hunting is still permitted under California Department of Fish and Wildlife. That is .7 percent or .007 Tule elk remaining from their original estimated population in 1848.

Tule elk numbers in PRNS have gone from over 700 in 2013 to around 500 this year, a loss of around 200. There are approximately 150 free ranging in the Limantour area and 350 at Tomales Point. This most recent drought, number two in the past decade, and other factors such as water and food deprivation are influencing species survival. Many elk are showing signs of malnutrition in deformed antlers and failure to produce offspring. Biologist and advocate citizens have found many carcasses where there was no water available to them and they are trapped behind a fence, unable to adapt which would a natural response state. This approach has resulted in animal cruelty and is cynical in its management to our publicly held resources.

**That the National Parks belonging to all of us would engage in this behavior and attitude is a betrayal of the public trust.**

Many of the ranches are ecological disasters and wastelands... their riparian areas and fields are devoid of vegetation, eroding and overgrazed hillsides with excessive amounts of cattle and little rotation and devoid of any biodiversity. Calf huts are multiplying to raise veal calves. This is a cruel treatment of any animal let alone in a National Park.

Johnne's disease, being used as a Tule elk removal justification by ranchers, is more likely to be transmitted from cattle to the elk, since that is what occurred in 1978 at Tomales Point. We submit that the NPS has better resources to deal with this than what is being proposed - especially since the free-ranging herds in the Limantour area are doing well and did not suffer the losses of the confined Tomales herds. We recommend that NPS no longer condone this mismanagement of ranch lands nor culling of an already stressed population. It is the ranchers that should be held to a higher standard than is currently exhibited, with distinct protocols followed regarding known best management of these public lands.

Tule elk should be put on the endangered species list. Any suggestion that they should be culled or removed from native lands of Point Reyes National Seashore would be irresponsible on the part of the park service would be a losing proposition with the public.

We agree with Center for Biological Diversity, Resource Renewal Institute and Turtle Island Restoration Network, For Elk, Restore Point Reyes....



To favor poorly managed livestock ranches, over a native species conflicts with the responsibility of the NPS to the public, founding doctrines and to the land's history. In fact, in the EIS comments the public demonstrated by over 90% support for the return of Tule elk to the lands owned by ranches. If the National Park Service does not represent the Tule elk or the public who is mostly footing the bill for the ranches, who do they represent?

Cultural resources from a chosen point in time and where industrial scale farms and ranches are considered cultural resources defies and defiles the definition of why the intent of Cultural Resource category was established under NEPA. Instead it is another unshrouded attempt to erase the Cultural Baseline of the Native American tribes that lived on the Point Reyes Peninsula. As a supporter of Indigenous First Rights, the tribe is not even considered in this dialogue which for the Park Service that should belong to all people, is reprehensible and racist. The determination of Cultural Resource Baseline favoring white families whose original lands were obtained illegally and through genocide does not reflect well this time in history when opportunities for reparations and apology are greatest.

We are requesting that you listen to the majority of over 7,000 comments on the Ranch Management Plan and read Center for Biological Diversity's (CBD) statement. The NPS will have a public problem with this.

Please vote to preserve the National Seashore and reject the ranching that has caused so much suffering.

[http://www.biologicaldiversity.org/news/press\\_releases/2014/tule-elk-09-18-2014.html](http://www.biologicaldiversity.org/news/press_releases/2014/tule-elk-09-18-2014.html)



Laura Chariton, M.A. Riparian/Environmental Policy and Restoration  
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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:

- 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](https://www.change.org/p/save-the-tule-elk) 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](http://www.polvorosakline.com)

December 16, 2020

Steve Padilla, Chair and Members  
California Coastal Commission  
455 Market Street, Suite 300  
San Francisco, CA 94105

RE: Consistency Determination for Point Reyes National Seashore Management Plan

Dear Chairman and Members of the Commission:

We wish to comment on your upcoming federal consistency hearing on the Point Reyes National Seashore Management Plan. Our comments are limited to the issues surrounding agriculture at Point Reyes. We are opposed to the chosen alternative B because it allows significant cattle and dairy ranching to continue in the park in a manner that is clearly detrimental to other public values expressed in the Coastal Act.

Having worked collectively for over 50 years at the Coastal Conservancy and having worked with Coastal Commission staff over the years we understand that the Coastal Act expresses multiple values. The continuance of coastal agriculture is one of those, but so are public access, water quality, scenic protection, and ecosystem integrity.

If we were arguing for Plan B we would suggest that it is consistent with the Coastal Act because the plan includes agriculture among other uses in the parks 70,000 acres. Together these contemplated activities contained in the plan include many of the activities favored in the Coastal Act. After all, agriculture is only allowed on less than 25% of the land.

But as in CEQA, it is the environmental setting that often determines what is a significant impact and what isn't. This is a national park. While national parks sometimes do have agricultural operations or livestock this is not their purpose. People want and expect national parks to have environmental integrity within their boundaries. This principle should also attach to the Coastal Act. Yes, the Coastal Act does favor continued agriculture in the Coastal Zone. But this should not be contemplated in areas that are environmentally sensitive and at levels that do damage to other values, especially when those places are owned by the public.

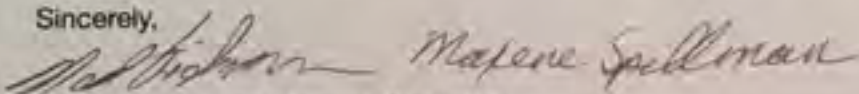
Continued agriculture affects the accessibility of Point Reyes by fencing off thousands of acres. It destroys water quality by deposition of manure throughout the area. The cattle and dairy operations affect the scenic quality of the land with piles of manure, modern buildings in some areas, and fencing. The loss of the opportunity to reestablish the elk herd is curtailed as is the quality of the habitat for other species.

Marin County farmers and ranchers are Northern California royalty. They deserve this admiration. Many have been and are leading environmentalists. They formed the Marin Agricultural Land Trust that has been supported by environmentalists for years. Preservation of agriculture is important in the Coastal Zone. But this is Point Reyes, a national park. The vast majority of people who have responded to you are against continued agriculture. This public concern should raise the Commission's level of concern for the values that are being harmed.

Plan B may touch on more of the values contained in the Coastal Act than other options. But these values conflict at Point Reyes. The ranchers argue that they cannot reduce operations and stay in business. It would not be practicable. But if agriculture stays at current levels, it is not practicable, indeed, not even possible to fully protect other values of greater importance to the public. This is evidenced by the overwhelming sentiment by the public that agriculture should cease.

Damage done by agriculture reduces the overall conditions of the park for all of its national park purposes but also very glaringly its coastal values. If agriculture is continued it will continue to be impracticable to have clean water, unobstructed scenery, healthy habitat for multiple species, and the public's ability to explore areas owned by them but which have been closed to them for decades. This is public property. The ranchers were paid for their land decades ago. Their concerns need to be heard and they need to be treated with respect. But the National Park was not founded as an agricultural preserve. Its agricultural operators have no right to farm at Point Reyes, only a hope. The harm to other values is too great with Plan B. For this reason it is not consistent with the Coastal Act.

Sincerely,

Handwritten signatures of Neal Fishman and Maxene Spellman. Neal Fishman's signature is on the left, and Maxene Spellman's signature is on the right.

Neal Fishman and Maxene Spellman  
390 Monte Vista Lane  
Petaluma, CA 94952  
510-590-2925  
707-790-3740

**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](mailto: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](mailto: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 Commitee,

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](mailto:tallyhomar@aol.com)  
925-672-7750

**From:** [ohamber09@everyactioncustom.com](mailto:ohamber09@everyactioncustom.com) <[ohamber09@everyactioncustom.com](mailto:ohamber09@everyactioncustom.com)> on behalf of Amber Tysor <[ohamber09@everyactioncustom.com](mailto:ohamber09@everyactioncustom.com)>  
**Sent:** Thursday, December 17, 2020 6:03 PM  
**To:** Weber, John@Coastal <[john.weber@coastal.ca.gov](mailto: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](mailto: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

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](mailto:phytopagan@sonic.net)>

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

**To:** Weber, John@Coastal <[john.weber@coastal.ca.gov](mailto: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@fws.gov](mailto:Ryan_olah@fws.gov) <[Ryan olah@fws.gov](mailto: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](mailto:ac.cox@hotmail.com)>

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

**To:** Coastal Point Reyes Management Plan <[PointReyesManagementPlan@coastal.ca.gov](mailto: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](mailto:Erickson18@comcast.net)>

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

**To:** Coastal Point Reyes Management Plan <[PointReyesManagementPlan@coastal.ca.gov](mailto: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](mailto:Erickson18@comcast.net)



**From:** Michael Chatham <[mchatham28@gmail.com](mailto:mchatham28@gmail.com)>

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

**To:** Coastal Point Reyes Management Plan <[PointReyesManagementPlan@coastal.ca.gov](mailto: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](mailto:nancycmcdonald@gmail.com)>

**Sent:** Wednesday, December 16, 2020 7:12:22 PM

**To:** Coastal Point Reyes Management Plan <[PointReyesManagementPlan@coastal.ca.gov](mailto:PointReyesManagementPlan@coastal.ca.gov)>

**Cc:** Weber, John@Coastal <[john.weber@coastal.ca.gov](mailto: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](mailto:hollyashton@live.com)>

**Sent:** Wednesday, December 16, 2020 6:21 PM

**To:** Coastal Point Reyes Management Plan <[PointReyesManagementPlan@coastal.ca.gov](mailto:PointReyesManagementPlan@coastal.ca.gov)>

**Cc:** Weber, John@Coastal <[john.weber@coastal.ca.gov](mailto: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](mailto:michellesahlin@yahoo.com)>  
**Sent:** Wednesday, December 16, 2020 6:14 PM  
**To:** Coastal Point Reyes Management Plan <[PointReyesManagementPlan@coastal.ca.gov](mailto:PointReyesManagementPlan@coastal.ca.gov)>  
**Cc:** Weber, John@Coastal <[john.weber@coastal.ca.gov](mailto: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](mailto: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](mailto:PointReyesManagementPlan@coastal.ca.gov)>

Cc: <[john.weber@coastal.c.gov](mailto:john.weber@coastal.c.gov)>, <[Carey\\_feierabend@nps.gov](mailto:Carey_feierabend@nps.gov)>, <[Craig\\_Kenkel@nps.gov](mailto:Craig_Kenkel@nps.gov)>, <[Ryan\\_olah@few.gov](mailto:Ryan_olah@few.gov)>, PnB Bonfilio-Lyon <[rednpeanut@gmail.com](mailto: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](mailto:dfrankoff@pixar.com)>  
**Sent:** Wednesday, December 16, 2020 4:49 PM  
**To:** Coastal Point Reyes Management Plan <[PointReyesManagementPlan@coastal.ca.gov](mailto:PointReyesManagementPlan@coastal.ca.gov)>  
**Cc:** Weber, John@Coastal <[john.weber@coastal.ca.gov](mailto: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](mailto:alli.sadegiani@gmail.com)>

**Sent:** Wednesday, December 16, 2020 4:36 PM

**To:** Coastal Point Reyes Management Plan <[PointReyesManagementPlan@coastal.ca.gov](mailto:PointReyesManagementPlan@coastal.ca.gov)>

**Cc:** Weber, John@Coastal <[john.weber@coastal.ca.gov](mailto: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:

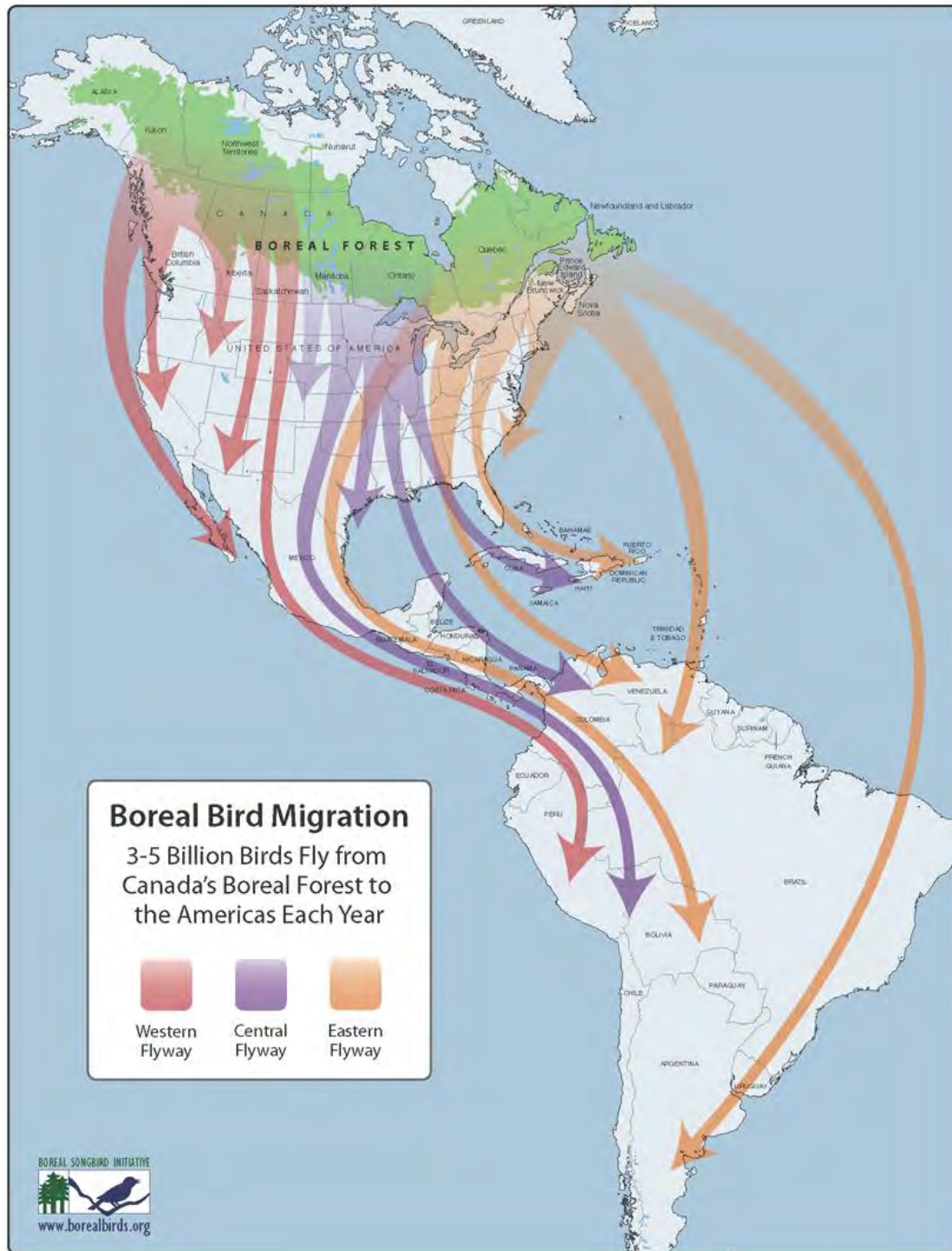
1. The giant new roadway improvements on Sir Francis Drake Boulevard increases road-kill of native animals and is inconsistent with protection of wildlife. It seems it was built to accommodate the large industrial trucks for hay, milk, and livestock.
2. Cattle operations divert and pump water from natural 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.

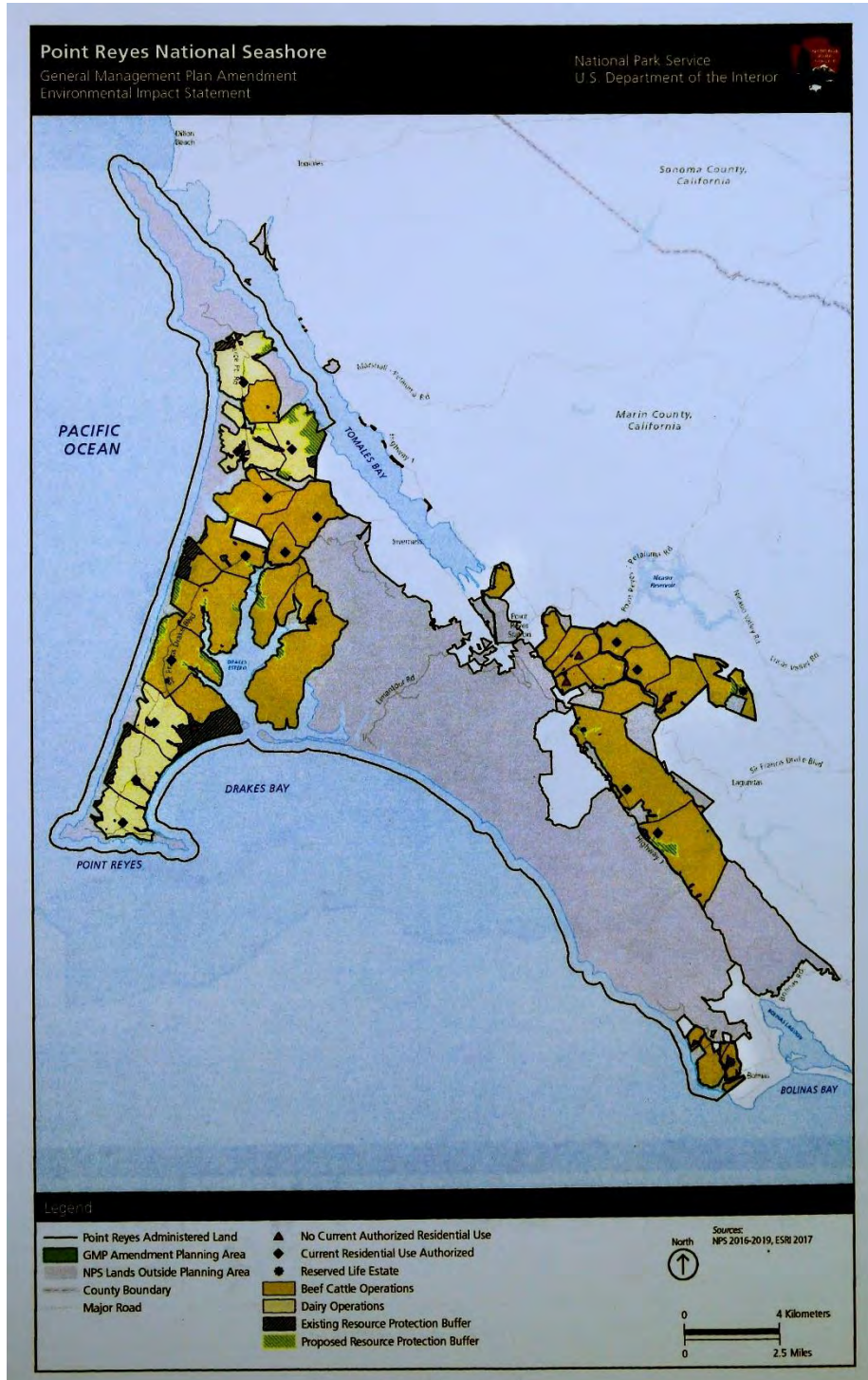
#### Our Qualifications:

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.

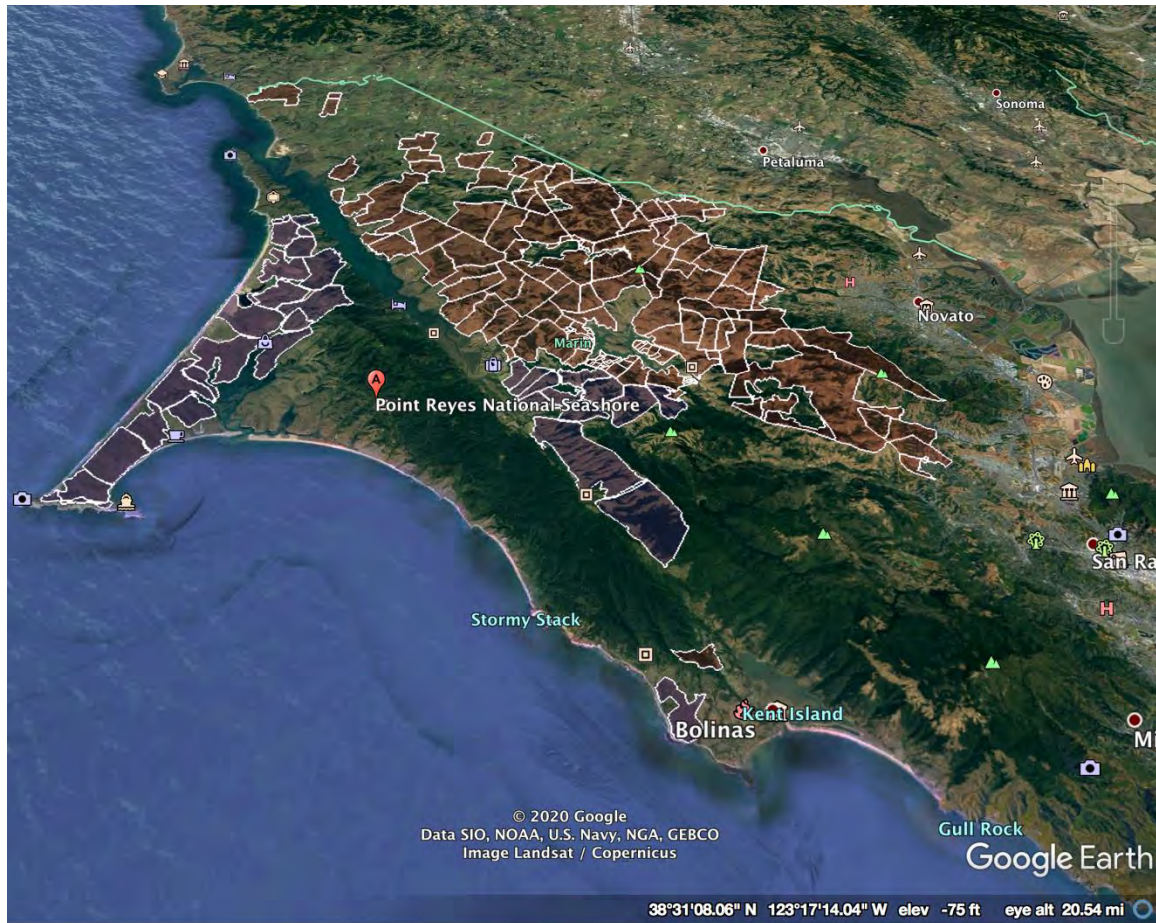


. The heart of the migration pathway is bereft of any benefits for wildlife. The Coastal Prairie has been hammered for over 150 years of overgrazing. The manure runs into the ocean or Drake's Bay. There are 16 ranches with 6000 head of cattle with barb-wire fencing on one of the most dramatic coastal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

C 415-238-3179 | [nick@socialcompassion.org](mailto: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](https://www.change.org/p/save-the-tule-elk) 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](http://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](mailto:ljrames@gmail.com)>

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

**To:** Simon, Larry@Coastal <[Larry.Simon@coastal.ca.gov](mailto:Larry.Simon@coastal.ca.gov)>; Lonna Richmond <[lonnajeane@gmail.com](mailto:lonnajeane@gmail.com)>;  
Chance Cutrano <[ccutrano@rri.org](mailto: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](mailto:roger.harris@comcast.net) <[roger.harris@comcast.net](mailto:roger.harris@comcast.net)>

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

**To:** Simon, Larry@Coastal <[Larry.Simon@coastal.ca.gov](mailto: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](mailto:adrescher@everyactioncustom.com) <[adrescher@everyactioncustom.com](mailto:adrescher@everyactioncustom.com)> on behalf of Anushka Drescher <[adrescher@everyactioncustom.com](mailto:adrescher@everyactioncustom.com)>  
**Sent:** Tuesday, December 15, 2020 8:09 PM  
**To:** Weber, John@Coastal <[john.weber@coastal.ca.gov](mailto: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@sbglobal.net](mailto:adrescher@sbglobal.net)

**From:** Jill Lublin <[jill.lublin@gmail.com](mailto:jill.lublin@gmail.com)> on behalf of Jill Lublin <[jill@jilllublin.com](mailto:jill@jilllublin.com)>  
**Sent:** Tuesday, December 15, 2020 7:30 PM  
**To:** Weber, John@Coastal <[john.weber@coastal.ca.gov](mailto: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](http://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.

[Www.publicitycrashcourse.com/freegift](http://www.publicitycrashcourse.com/freegift)

Please connect with me on my social network profiles:

Contact me on LinkedIn  
[Http://www.linkedin.com/in/jilllublin](http://www.linkedin.com/in/jilllublin)

Follow me on twitter:  
[Http://twitter.com./jilllublin](http://twitter.com./jilllublin)

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](mailto:rjdmaher@gmail.com)>

**Sent:** Tuesday, December 15, 2020 7:29 PM

**To:** Coastal Point Reyes Management Plan <[PointReyesManagementPlan@coastal.ca.gov](mailto:PointReyesManagementPlan@coastal.ca.gov)>

**Cc:** Weber, John@Coastal

<[john.weber@coastal.ca.gov](mailto: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:** 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](mailto:ellen101@comcast.net)>

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

**To:** Weber, John@Coastal <[john.weber@coastal.ca.gov](mailto:john.weber@coastal.ca.gov)>

**Cc:** [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)>

**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 <[lonnajeau@gmail.com](mailto:lonnajeau@gmail.com)>  
**Sent:** Tuesday, December 15, 2020 3:43 PM  
**To:** Simon, Larry@Coastal <[Larry.Simon@coastal.ca.gov](mailto: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](mailto:binker3@icloud.com)>  
**Sent:** Tuesday, December 15, 2020 2:32 PM  
**To:** Weber, John@Coastal <[john.weber@coastal.ca.gov](mailto: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 9<sup>th</sup>, 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](mailto: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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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](mailto:cportman@gmail.com)  
5306660882

**From:** Cat Mom <[ginaward2000@gmail.com](mailto:ginaward2000@gmail.com)>

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

**To:** Coastal Point Reyes Management Plan

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

**From:** Don Forman <[donf1@comcast.net](mailto:donf1@comcast.net)>

**Sent:** Monday, December 14, 2020 6:27 PM

**To:** Coastal Point Reyes Management Plan <[PointReyesManagementPlan@coastal.ca.gov](mailto:PointReyesManagementPlan@coastal.ca.gov)>

**Cc:** Weber, John@Coastal

<[john.weber@coastal.ca.gov](mailto: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)>

**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](mailto:ccdowner@aol.com)>

**Sent:** Monday, December 14, 2020 4:14 PM

**To:** Coastal Point Reyes Management Plan <[PointReyesManagementPlan@coastal.ca.gov](mailto:PointReyesManagementPlan@coastal.ca.gov)>

**Cc:** Weber, John@Coastal

<[john.weber@coastal.ca.gov](mailto: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)>; Craig Downer <[ccdowner@aol.com](mailto: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](mailto:judithrachelleg@gmail.com)>  
**Sent:** Monday, December 14, 2020 2:48 PM  
**To:** Weber, John@Coastal <[john.weber@coastal.ca.gov](mailto: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.

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♥ Judith Gottesman, MSW ♥  
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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](mailto:ompeace28@aol.com)>

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

**To:** Coastal Point Reyes Management Plan <[PointReyesManagementPlan@coastal.ca.gov](mailto:PointReyesManagementPlan@coastal.ca.gov)>

**Cc:** [Ryan\\_olah@few.gov](mailto:Ryan_olah@few.gov) <[Ryan\\_olah@few.gov](mailto:Ryan_olah@few.gov)>; Weber, John@Coastal <[john.weber@coastal.ca.gov](mailto: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)>

**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

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. Catherin Schwemm  
Tomales, CA 94971

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**From:** Kat Despain <[kat.m.despain@gmail.com](mailto:kat.m.despain@gmail.com)>

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

**To:** Coastal Point Reyes Management Plan <[PointReyesManagementPlan@coastal.ca.gov](mailto: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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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](mailto:kenneyj88@yahoo.com)>  
**Sent:** Thursday, December 10, 2020 7:01:21 PM  
**To:** Carl, Dan@Coastal <[Dan.Carl@coastal.ca.gov](mailto: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](mailto: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

**From:** Laura Cunningham <lcunningham@westernwatersheds.org>

**Sent:** Wednesday, December 9, 2020 8:03 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 <Carey\_feierabend@nps.gov>; Ryan\_olah@few.gov <Ryan\_olah@few.gov>

**Subject:** Comment on the Coastal Consistency Determination reviewed by the California Coastal Commission for the Proposed Point Reyes National Seashore General Management Plan Amendment CD-0006-20

Please accept these comments by Western Watersheds Project and other groups and individuals who have spent time in Point Reyes National Seashore and Golden Gate National Recreation Area observing impacts of cattle grazing to coastal resources and public access.

Superintendent Feirabend, please add this comment to the administrative record for the General Plan amendment/Environmental Impact Statement review process public comments.

Thank you.

--

Laura Cunningham  
California Director  
Western Watersheds Project  
Cima CA 92323  
Mailing address:  
PO Box 70  
Beatty NV 89003  
(775) 513-1280

**From:** christine hoex <[choex@sbcglobal.net](mailto:choex@sbcglobal.net)>

**Sent:** Wednesday, December 9, 2020 9:29 PM

**To:** Coastal Point Reyes Management Plan <[PointReyesManagementPlan@coastal.ca.gov](mailto:PointReyesManagementPlan@coastal.ca.gov)>

**Subject:** Protect the Tule Elk.

Dear Members of the California Coastal Commission and staff,

I am writing to advocate for the protection of Point Reyes National Seashore as a wilderness preserve first and foremost. I also advocate for the protection and preservation of the native species of Point Reyes National Seashore and its ecosystems integrity. I believe that adequate study has not been done on the impact of animal agriculture within the park boundaries. The impact of cattle waste specifically degrades the ecosystems of both the land and the ocean. This is not compatible with the goals of protecting the Tule Elk and their habitat, which represent the conservation of a multitude of native species and ecosystem processes in the Pt Reyes peninsula, a unique biological area.

Currently with the human population at 7.8 billion, we are crowding out all other species. Henry Miller had the foresight to preserve this last isolated group of Tule Elk (*Cervus canadensis nannodes*) on his ranch in 1874. Tule elk which are endemic to California and Point Reyes, remain only at Point Reyes National Seashore. They were the dominant grazers on these lands until their local extirpation by humans in the 1850's. The protection of the Tule Elk at Point Reyes National Seashore is not only about the protection of one species, but the whole of its habitat. The preservation of such precious wilderness is according to the Parks website "one of the primary missions of the National Park Service." I am asking for the Protection of the Tule Elk, and the elimination of cattle and other agricultural animals from where they infringe upon the Elk habitat within the park.

To expand the discussion of wilderness conservation I refer to a interview with eminent biologist E.O. Wilson. In his book, Half Earth, He urges the world to set aside 50 % of of the earth and oceans for wild species to avoid a mass extinction event.

The Half-Earth concept was conceived by E.O. Wilson, the eminent biologist, two-time Pulitzer Prize winner, and noted myrmecologist (that's someone who studies ants). As Wilson wrote in

the January/February 2016 edition of *Sierra*:

"Only by committing half of the planet's surface to nature can we hope to save the immensity of life-forms that compose it. Unless humanity learns a great deal more about global biodiversity and moves quickly to protect it, we will soon lose most of the species composing life on Earth.

<https://www.sierraclub.org/sierra/conversation-eo-wilson>

I believe this broader discussion is pertinent in my request to protect the Tule Elk and their habitat. What better place to protect the wilderness than National Park, a conservation of our national resources.

Thank you for your consideration.

Respectfully,

Christine Hoex

330 Horn ave

Santa Rosa Ca.